

NOTICE OF MEETING

CABINET

Tuesday, 12th November, 2019, 6.30 pm - Civic Centre, High Road, Wood Green, N22 8LE

Members: Councillors Joseph Ejiofor (Chair), Zena Brabazon (Vice-Chair), Charles Adje, Kaushika Amin, Mark Blake, Gideon Bull, Seema Chandwani, Kirsten Hearn, Emine Ibrahim and Sarah James

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 27 below. New items of exempt business will be dealt with at Item 35 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 28 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 - 42)

To confirm and sign the minutes of the meeting held on 8th October 2019 as a correct record.

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

8. DEPUTATIONS/PETITIONS/QUESTIONS

To consider any requests received in accordance with Standing Orders.

9. THE NEED FOR ADDITIONAL HOUSING REVENUE ACCOUNT SPEND ON NEW BUILD PROPERTIES AND TEMPORARY ACCOMMODATION ACQUISITIONS (PAGES 43 - 50)

[Report of the Director of Finance. To be introduced by the Cabinet Member for Finance and Strategic Regeneration.]

Cabinet approval sought for additional housing revenue capital expenditure for the remainder of 2019-20. This will be to increase the level of budget within the capital programme for the construction of new build properties, the acquisition of homes on new build schemes and the acquisition of existing properties to house homeless households. This report will also address the revenue implications. This report will be for onward approval by Full council in November.

10. AMENDMENTS TO THE COMMUNITY BENEFIT SOCIETY (PAGES 51 - 60)

[Report of the Director of Housing, Regeneration and Planning. To be introduced by the Cabinet Member for Housing and Estate Renewal.]

Amendments to the Community Benefit Society's governance and its funding and lease arrangements with the Council.

11. SEND TRANSPORT INVEST TO SAVE BUSINESS CASE (PAGES 61 - 86)

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

The SEND Transport Invest to Save business case identifies a number of service delivery improvement measures that are expected to secure improved value for money for the citizens of Haringey, whilst maintaining the high level of service currently offered to our children and young people with special educational needs and disability, and their families. Subject to presently ongoing procurement processes, the business case is also expected to propose the appointment of an external partner to support the transformation process.

12. ADMISSION TO SCHOOLS – PROPOSED ADMISSION ARRANGEMENTS FOR 2021/22 (PAGES 87 - 158)

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

This report seeks Cabinet approval to commence a six-week period of statutory consultation to determine the Council's School Admission Arrangements for the academic year 2021/22.

13. OPTIONS FOR THE FUTURE OF STAMFORD HILL PRIMARY SCHOOL (PAGES 159 - 222)

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

This report details the outcome of a six-week formal consultation on the proposal to amalgamate Stamford Hill Primary School with Tiverton Primary School.

14. CHILDCARE SUFFICIENCY STRATEGY (PAGES 223 - 376)

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

This paper presents Haringey's third Childcare Sufficiency Assessment (CSA), a statutory duty, providing an overview of the 2019 exercise and highlighting key findings. This report seeks approval from Cabinet for the proposed Childcare Action Plan, 2019-2023, which addresses the key findings from the CSA and identifies areas for action.

15. CHARGING FOR MANAGED ACCOUNTS 2018/19 MTFS PROPOSAL: CONSULTATION FINDINGS AND FEEDBACK REPORT. (PAGES 377 - 416)

[Report of the Director of Adults and Health. To be introduced by the Cabinet Member for Adults and Health.]

The report provides the feedback, outcome and recommendation following the statutory public consultation on the proposed introduction of Charging for Managed Accounts in relation to an annual management fee for Department for Work and Pensions (DWP) Appointee Accounts and an annual fee for Self Funders as part of 2018/19 MTFS proposals.

16. COMMUNITY INFRASTRUCTURE LEVY (CIL) PARTIAL REVIEW: DRAFT CHARGING SCHEDULE (DCS) CONSULTATION (PAGES 417 - 512)

[Report of the Director of Regeneration, Planning and Development. To be introduced by the Cabinet Member for Climate Change and Sustainability.]

The report seeks Cabinet's approval to publish the Draft Charging Schedule and associated evidence base documents for public consultation; and seeks that the Director for Housing, Regeneration and Planning is given delegated authority to finalise and approve the proposed Submission documents, and submit the Draft Charging Schedule for examination.

17. UPDATE OF THE HARINGEY LOCAL DEVELOPMENT SCHEME (LDS) 2016 - 2019 (PAGES 513 - 528)

[Report of the Director of Regeneration, Planning and Development. To be introduced by the Cabinet Member for Climate Change and Sustainability.]

The Local Development Scheme (LDS) sets out the work programme for future planning policy documents that make up the Local Plan, and provides early opportunities for public and stakeholder engagement in the emerging local planning framework.

18. LONDON BOROUGH OF HARINGEY AIR QUALITY ACTION PLAN 2018-22 PUBLIC AND ENFORCEMENT OF ANTI-IDLING REGULATIONS (PAGES 529 - 650)

[Report of the Director of Environment and Neighbourhoods. To be introduced by the Cabinet Member for Climate Change and Sustainability.]

Final Draft following public & statutory consultation on the Haringey Air Quality Action Plan 2018-22. Agreement to become a designated authority to issue fixed penalty notices for stationary idling engine offences.

19. AFFORDABLE ENERGY STRATEGY AND AGREEMENT TO PROCEED WITH PUBLIC CONSULTATION (PAGES 651 - 700)

[Report of the Director of Housing, Regeneration and Planning. To be introduced by the Cabinet Member for Climate Change and Sustainability.]

This five-year Affordable Energy Strategy replaces the previous Affordable Warmth Strategy 2009-2019. This is in recognition that fuel poverty or 'energy vulnerability' goes beyond cold homes and related health effects.

20. COUNCIL ENERGY CONTRACT AWARD (PAGES 701 - 710)

[Report of the Director of Housing, Regeneration and Planning. To be introduced by the Cabinet Member for Climate Change and Sustainability.]

Awarding of the electricity and gas supplier contracts for the Council and its partner organisations. A total spend of approximately £6.2m per year.

21. IMPROVEMENTS TO HIGH-SPEED BROADBAND INFRASTRUCTURE AND CONNECTIVITY IN THE BOROUGH (PAGES 711 - 724)

[Report of the Director of Housing, Regeneration and Planning. To be introduced by the Cabinet Member for Local Investment and Economic Growth.]

The report will be seeking Cabinet approval for Officers to invite Expression of Interest from broadband suppliers to install full fibre high-speed broadband infrastructure and connections to council-owned housing stock, commercial

properties, libraries and other community buildings and facilities - in exchange for the council entering into a Non-Exclusive Wayleave Agreement ("Wayleave/Broadband Agreement") with the selected broadband supplier(s). The report will also update Cabinet on the delivery plans for £800,000 SIP funding received to upgrade/install full fibre/gigabit infrastructure.

22. AGREEMENT TO AWARD OF CONTRACT FOR FERRY LANE PUBLIC REALM SCHEME (PAGES 725 - 734)

[Report of the Director of Housing, Regeneration and Planning. To be introduced by the Cabinet Member for Finance and Strategic Regeneration.]

The Public Realm Scheme will deliver Sustainable Urban Drainage (SUDs), introduction of segregated cycle lanes, improved surfacing, street lighting and minimise maintenance costs in the long term.

23. NOVATION OF CONTRACT FOR PROVISION OF SAP MANAGED SERVICE (PAGES 735 - 738)

[Report of the Director for Customers, Transformation and Resources. To be introduced by the Cabinet Member for Corporate and Civic Services.]

Novation of contract for provision for the provision of the SAP Managed Service.

24. REGULATION OF INVESTIGATORY POWERS ACT (RIPA) 2000: USE WITHIN THE COUNCIL 2018/19 AND REVIEW OF TO THE COUNCIL'S INVESTIGATORY POWERS POLICIES UNDER RIPA 2000 AND INVESTIGATORY POWERS ACT 2016 (PAGES 739 - 770)

[Report of the Assistant Director of Corporate Governance. To be introduced by the Leader of the Council.]

Regulation of Investigatory Powers Act (RIPA) 2000: Use within the Council 2018/19 and review of to the Council's investigatory powers policies under RIPA 2000 and Investigatory Powers Act 2016.

25. SUPPLY OF GOODS AND SERVICES FOR CAMERAS REFRESH, UPGRADE AND NETWORK EXTENSION – CONTRACT AWARD (PAGES 771 - 776)

[Report of the Director of Environment and Neighbourhoods. To be introduced by the Cabinet Member for Communities and Equalities.]

This report seeks approval from Cabinet for the award of contract under Contract Standing Order (CSO) 9.07.1 (d) for the design, supply and installation at site, testing and completion of the works and the remedying of defects in the works in accordance with the Contract of CCTV cameras.

26. NORTH HILL RETAINING WALL WORKS (PAGES 777 - 784)

[Report of the Director of Environment and Neighbourhoods. To be introduced by the Cabinet Member for Neighbourhoods.]

The report will seek agreement to award of Contract for North Hill Retaining Wall scheme following a competitive procurement process. The scheme forms part of the Council's Sustainable Transport Works Plan (STWP) for 2019/20.

27. NEW ITEMS OF URGENT BUSINESS

To consider any items admitted at Item 3 above.

28. EXCLUSION OF THE PRESS AND PUBLIC

Note from the Acting Democratic Services and Scrutiny Manager

Items 29 to 35 allow for consideration of exempt information in relation to items 11, 20, 22, 25, and 26.

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:

Information relating to the financial or business affairs of any particular person (including the authority holding that information).

Information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.

29. SEND TRANSPORT INVEST TO SAVE BUSINESS CASE (PAGES 785 - 786)

As per item 11.

30. COUNCIL ENERGY CONTRACT AWARD (PAGES 787 - 792)

As per item 20.

31. AGREEMENT TO AWARD OF CONTRACT FOR FERRY LANE PUBLIC REALM SCHEME (PAGES 793 - 794)

As per item 22.

32. SUPPLY OF GOODS AND SERVICES FOR CAMERAS REFRESH, UPGRADE AND NETWORK EXTENSION – CONTRACT AWARD (PAGES 795 - 814)

As per item 25.

33. NORTH HILL RETAINING WALL WORKS (PAGES 815 - 816)

As per item 26.

34. EXEMPT CABINET MINUTES (PAGES 817 - 820)

To approve the exempt Cabinet Minutes for the 8th October 2019 meeting.

35. NEW ITEMS OF EXEMPT URGENT BUSINESS

To consider any items admitted at Item 3 above.

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Monday, 04 November 2019

MINUTES OF MEETING CABINET HELD ON TUESDAY, 8TH OCTOBER, 2019, 6.30PM

PRESENT:

Councillors: Joseph Ejiofor (Chair), Zena Brabazon (Vice-Chair), Charles Adje, Kaushika Amin, Mark Blake, Gideon Bull, Seema Chandwani, Kirsten Hearn, Emine Ibrahim and Sarah James

ALSO ATTENDING: Connor, Rice and Tucker

25. FILMING AT MEETINGS

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

26. APOLOGIES

There were no apologies for absence.

27. URGENT BUSINESS

There were no items of urgent business submitted.

28. DECLARATIONS OF INTEREST

Councillor Chandwani declared a prejudicial interest in items 16 and 29 as she was an employee of the Selby Centre.

Councillor Mark Blake declared a personal interest in items 22 and 35 which were the reports on the Pupil Referral Unit contract extension.

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

There were no representations received.

30. MINUTES

The minutes of the 10th of September 2019 were agreed as an accurate record of the meeting.

31. DEPUTATIONS/PETITIONS/QUESTIONS

There were no deputations, petitions or questions put forward.

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

The Leader outlined that - Cabinet would consider the Scrutiny Reviews on Day Care Opportunities and Care Home Commissioning and further consider the response to the Scrutiny recommendations.

At the start of items 9 and 10 the Scrutiny Reviews will be introduced by Cllr Pippa Connor - Chair of the Adults and Health Scrutiny Panel.

The Cabinet response to the Scrutiny recommendations would be provided by Cllr Sarah James - Cabinet Member for Adults and Health.

33. SCRUTINY PANEL REVIEW ON CARE HOME COMMISSIONING

Councillor Connor introduced the scrutiny review, thanking all participants and setting out that the review had been undertaken not to look at any individual care setting but to gain a deeper understanding of the process and how, as a local authority, the Council best placed to instigate change and improvements. Participants in the review had appreciated that they were being listened to by the Council and there was an opportunity to discuss their ideas, hopes and aspirations for the service.

The aim of the review was to improve systems to directly enhance both the staffing offer and retention and the client experiencing the care alongside their Carer.

In identifying these key themes within each of the areas, it was hoped that the recommendations could assist not only in the development of a skilled and valued workforce within a recognised body encompassing pay, conditions and training, but also that the Providers would be supported both within their funding to remain a stable provision both within Haringey and surrounding boroughs.

Cllr Connor, felt that there had been a ground swell of opinion to establish a professional body to represent carers, ensuring better pay & rights, developing professional status and allowing professional qualifications with a regular pay review. This recommendation was above the curve but the Panel felt that this was an evitable progression arising from the recognition of the key role of carers.

Cllr Connor outlined that there were individual recommendations for clients and carers, which have been identified to support their choice and independence whilst ensuring they gain access to the best care. Cllr Connor spoke about establishing an information portal which was both accessible to both client and professionals. She outlined that providing accessible information was imperative at what could be a stressful time for clients and carers. Cllr Connor highlighted that this was essentially about knowing what to ask for which could be difficult when entitlements to services may not be known or understood. A hard copy of the care pathway guide was referred to as an excellent example of setting out what to ask for and when.

Cllr Connor concluded by stating the important role for Scrutiny in continuing to listen to residents in the social care settings.

In response to the recommendations, the Cabinet Member for Adults thanked the Adults and Health Scrutiny Panel for considering the commissioning of care homes for Haringey residents. This was an important issue and any opportunity to learn from best practice elsewhere and to enhance practice in Haringey was much welcomed.

The Cabinet Member drew attention to the response to recommendations which makes clear that there is a lot of work going on in the Adults social care area and with fellow boroughs in the NCL region regarding examining the way in which commissioning is working. There was a recognition of the importance of care homes sector. The Council were further exploring local area co-ordinators, new reach and connect service and social prescribing and how all these things will work together in the next few years. In this context. the report was also welcomed for the ideas and recommendations that it offered.

The Cabinet Member added that the first recommendation on the professional body for care workers, was a great idea but would likely need to be a national body to have an impact .The idea of having professional employment routes for carers was strongly supported.

RESOLVED

To agree the response to the recommendations of the Review of Care Home Commissioning, carried out by Adults and Health Scrutiny Panel and endorsed by Overview and Scrutiny Committee.

Reasons for decision

There is a duty on Cabinet to respond to a report from the Overview and Scrutiny Committee – and in any event, the commissioning of care homes are both important issues for local residents, contributing to improved health and wellbeing.

Alternative options considered

There is a duty on Cabinet to respond to a report from the Overview and Scrutiny Committee and therefore no alternative option was considered.

34. SCRUTINY PANEL REVIEW ON DAY CARE OPPORTUNITIES

Councillor Connor introduced this item on the Adults and Health Scrutiny Panel's in-depth piece of work regarding day care opportunities and community provision in Haringey. Following the review, a number of recommendations were made to Overview and Scrutiny Committee. This report provided a response to the Overview and Scrutiny Committee recommendations

Councillor Connor detailed the background to the scrutiny panel review and highlighted the following information:

- The review was undertaken at an important time during the Council's refresh of the day care offer, with the Adult Social Care Redesign Group reviewing the day care opportunities in Haringey. The review was therefore able to be proactive and address a number of key stakeholders, such as service users, care users and relatives.
- Thanked those who contributed towards the findings of the review, including the staff who ran the day care opportunities, the volunteer groups who provided regular support events, and the relatives and carers for participating in the review.
- Praised the expansion of the services for those with learning disabilities and autism. The Councillor also praised the background staff who worked in out of borough services and highlighted ensuring the right people and organisations ran these services who had the skills and experience to enhance the lives of Haringey's service users.
- The east of the Borough must also be provided with excellent day care services, such as those seen in the west of the Borough.
- Transport became a significant topic during the review with it being frequently discussed by services users.
- Communication and knowledge were identified as key areas of concern by services users, their carers and relatives with it not being widely known what loved ones were entitled to. The use of a guide was promoted by the Councillor to encourage wider distribution of the requisite knowledge for those with loved ones entitled to such services.
- Thanked the Haringey's Over 50s Group for creating a number of useful leaflets. Those had been circulated to councillors.
- Welcomed the implementation of the accepted recommendations.

The Cabinet Member for Adults and Health provided a response to implementing the Overview and Scrutiny Committee recommendations.

The Cabinet Member welcomed the report and noted that most of the recommendations were accepted. The issues raised from the Scrutiny Panel Review would form part of the work of the Adult Social Care Redesign Group, in particular, the Day Care Opportunities Group. It was anticipated that two centres would open in April 2020 which would provide specialist care to those with autism and learning disabilities. The Council was also increasing the amount of supported living accommodation for specialist groups. The importance of co-design and collaboration was stressed as being integral to the success of these services, with Mulberry Centre used as an example of co-design used successfully.

Regarding access to information, the Cabinet Member noted the comments of the Scrutiny Review Panel and praised the Haringey Over 50s leaflets. The Bridge Renewal Trust's website was also recommended as a valuable source of information.

RESOLVED

To agree the response to the recommendations of the Review of Day opportunities and community provision, carried out by Adults and Health Scrutiny Panel and endorsed by Overview and Scrutiny Committee at appendix 1.

Reasons for decision

There is a duty on Cabinet to respond to a report from the Overview and Scrutiny Committee – and in any event, the provision of day opportunities and access to a strong community offer are both important issues for local residents, contributing to improved health and wellbeing.

Alternative options considered

There is a duty on Cabinet to respond to a report from the Overview and Scrutiny Committee and therefore no alternative option was considered.

35. DEVELOPMENT OF INSOURCING POLICIES

The Leader of the Council introduced this report which set out the rationale, purpose, and scope of an Insourcing Policy for the Council. The new Insourcing Policy marked a significant shift away from the Council's previous approach, and identified a new policy where insourcing was the default preference.

The Leader highlighted that the Council's commitment to insourcing was grounded in a belief that all public spending should firstly deliver a public benefit, and that every council's plan for the delivery of services on behalf of their residents should seek to maximise every pound spent on the delivery of the service itself. Consequently, this Insourcing Policy signalled a significant change of direction for Haringey Council. The Council should no longer be perceived as a Commissioning Council, but a municipality committed to finding ways to directly deliver services to residents.

The Leader emphasised that the administration was moving to reverse at a local level the almost forty year national trend towards outsourcing, which had resulted from not just the 'opening up' of public services to the market, but also a legislative regime that had made in-house provision of local services more difficult. This policy had caused a range of harms: it had unfairly meant that local councils lost control over some local services whilst retaining ultimate responsibility for their quality and delivery; it had eroded worker protections and the power and mutual support of organised labour; and the artificially low costing of outsourced projects had meant that the public sector and society more widely have been left footing the bill.

The Leader noted that introducing a preference for insourcing supported the administration's goals to improve local services for local people, maximise the community benefit it achieved with its budget, increase quality job opportunities and good working conditions for residents, and secured democratic accountability of public services. In Haringey, there was a strong starting point: the Council had retained in-house many services which had been outsourced elsewhere and had already made good progress in bringing more services in-house. The introduction of this policy signalled the Council's commitment to build on this work.

The Leader welcomed the policy as committing the Council to a strategic review of all externally commissioned services as their contracts come up for renewal. This would assess the efficient management and workings of all externally commissioned services and anticipate opportunities to bring services back in-house, in a way that focussed on what was most important to the administration, and sustainably increases the capacity of the Council.

In response to questions from Cllr Connor, the following information was provided:

- Every contract had a different aspect and the Council would examine every individual case and look at the savings and improved services that residents could expect to be achieved when considering the insourcing of services.
- The Leader reflected that following nearly 10 years of austerity, these circumstances had led local authorities to seek support from the private sector. This had inevitably led to a high number of resources and expertise leaving local authorities. There was now a need to do this differently for residents and to achieve benefits for the Council
- The overall preference was for direct delivery of services by the Council or through a local voluntary organisation with the appropriate skills to deliver the required service. The Council would avoid procuring organisations which were located a distance away from the borough and had no insight of the borough.

RESOLVED

1. To note progress made to date in relation to insourcing services that could otherwise be delivered by commercial providers;
2. To approve the Insourcing Policy, as set out in Appendix 1;
3. To approve the development of an implementation plan and the commencement of work to build the capacity of the organisation to insource services;
4. To note links with the Council's Community Wealth Building approach and the forthcoming Economic Development Strategy.

Reasons for decision

The trend among local authorities towards insourcing is driven by several factors, including:

- Financial pressures, noting that insourcing and direct delivery may be more cost efficient and provide better value for money
- Risk management, noting the collapse of Carillion and the need to insulate critical services from commercial failure
- Public expectations, noting that insourced services have achieved higher degrees of user satisfaction than the previously outsourced services

In addition, the following potential benefits of bringing services in-house have contributed to the case for insourced services:

- Better quality services, compared to under-performing outsourced services;

- Value for money and flexibility whereby councils, by virtue of having direct control of services, are better able to respond to changing needs;
- More strategic, holistic delivery of local public services as part of integrated delivery models, made possible by insourcing of services;
- Contribution to local economy, whereby insourcing can result in stronger local supply chains and enhanced local employment;
- Sustainability, whereby direct control can enable service delivery to reflect environmental considerations and sustainability commitments

It is important to note that these benefits can only be realised, and the Council's objectives met, when insourcing is done well. The challenge for Haringey, and all local authorities, is not just to make the right individual decisions about insourcing specific services, but also to set the parameters for determining what is practically feasible in terms of insourcing, taking into account capability, capacity, and financial implications relating to the transition to insourced services.

The proposal to approve the Insourcing Policy is being made in order to signal a clear step-change in the Council's service delivery policy. Having a clear policy will ensure that decisions about whether to insource services are taken in ways which maximise the chances of success.

It also makes a commitment to a structured programme of work to support sustained progress on this agenda, building on work to date. As part of this work, an implementation plan for insourcing will be agreed by Cabinet by March 2020 which will set out further detail on how the Council will adopt a strategic approach to bringing services back in-house, make individual decisions about insourcing services using an updated commissioning framework, and develop the resource and infrastructure needed to support this programme of work.

The policy recognises that the desire to insource services underpins the political priorities of this administration and remains the Council's preferred model of service delivery. However, the Council must make decisions on a sustainable and legal basis. Where the council looks at proposals of how to deliver any service going forward, the quality of that delivered service and the social and financial value for money must be considered. Furthermore, proposals must be subject to assessment as part of our commissioning processes.

Decision options will include direct delivery by the Council, working with other public sector organisations, extension of current contracts, commissioning of alternative third-party providers shared services, working with community and voluntary sector organisations, or a hybrid model whereby various aspects of a service are delivered by different providers that may be in-house or external. Decisions may also be taken to insource services at a later date, subject to development of sufficient organisational capability and/or capacity.

Alternative options considered

Do nothing

The Council could not adopt an Insourcing Policy. This would mean that either a) no decisions to insource would be made, or b) such decisions would be made in an ad hoc manner with insufficient consideration for the criteria for successful transition to in-house delivery noted at para 4.6. This option would either a) not deliver the administration's manifesto commitment, or b) would result in an unsustainable degree of legal and financial risk to the Council. On this basis the option to not adopt an Insourcing Policy has been rejected.

36. PROCUREMENT STRATEGY

The Cabinet Member for Local Investment and Economic Growth introduced this report which set out an up-to-date Procurement Strategy for the Council.

The Cabinet Member highlighted the following:

- Paragraph 1.4 of the report was not in order of importance.
- There was specific weighting within the procurement strategy for the promotion of social values and also community wealth building.
- The Council was looking to increase its contract expenditure with local businesses from circa 25% to 30% per annum.
- London Living Wage was a key feature of the Procurement Strategy.
- Encouraging that suppliers be based in the Borough, wherever possible.

In response to questions from Councillor Conner, the following information was provided:

- Officers confirmed there was an insourcing sub group and a number of governance boards that reviewed proposals and so there was no potential for conflict of interest between procurement interacting with insourcing decisions. A decision to insource would be made prior to a decision to go out to market.
- Officers informed there were requirements within Council contracts to comply with the Freedom of Information Act and any other statutory obligations. The Council would encourage suppliers to be as transparent as possible, insofar as commercial confidentiality allowed.
- Regarding quality weightings to be introduced, Officers noted this would be done on a case by case basis and was dependent on what the Council was looking for.

RESOLVED

1. To approve the 2020 – 2025 Procurement Strategy, as set out in Appendix 1;
2. To note the progress made to date in relation to Strategic Procurement and its achievements in supporting Community Wealth Building, small businesses and promoting social value;
3. To note the links with the Council's Commissioning framework, Insourcing Policy and Community Wealth Building approach;

4. To note compliance with the Social Value Act, Public Contract Regulations and National Procurement Strategy.

Reasons for decision

The Council's current outdated Procurement Strategy was established in 2010. Since then, the Public Contract Regulations have changed, we have seen the introduction of the Social Value Act, both of which have significantly altered the way in which we are able to procure works, goods and services. The emergence of the Borough Plan and the changes to the Council's priorities have meant we need to adopt a new Procurement Strategy that reflects these changes.

A revised Procurement Strategy is a deliverable of the Borough Plan (outcome 13) and supports many of the priorities within the Borough Plan.

In 2018 a new National Procurement Strategy was released; the Strategy presented to Cabinet (Appendix 1) is aligned to the National Procurement Strategy, which the Council is required to submit returns to central government.

The Strategy provides a Delivery Framework and key considerations in how we structure our procurement activity. Applying this structure and consistency across our commissioning and procurement activity will assist deliver the Council's priorities?

This strategy sets out the ambition for the Council's use of Procurement to positively impact on our economy and communities in recognising the commercial, social, economic and environmental benefits to be gained from taking a sophisticated intelligent approach to our Procurement activity.

Adopting the Strategy will enable significant social, economic and environmental benefits to be delivered to our local businesses, residents, community groups.

Alternative options considered

Do nothing

This is not a realistic option as the 2010 Procurement Strategy is not aligned to the current Regulations, Borough Plan, Council Priorities or National Procurement Strategy.

37. COMMUNITY WEALTH BUILDING

The Cabinet Member for Local Investment and Economic Growth introduced this report which set out Haringey's Community Wealth Building approach (CWB), which included:

- What CWB means in Haringey and why it is relevant; and
- Key actions to implement CWB over the next year.

The Cabinet Member noted that community wealth building was fundamentally about equality and fairness. It was about using the Council's direct powers and working with partner organisations to promote resilience and wealth – both financial and social – in our families and communities. Haringey had a high proportion of residents living below the poverty line (34%). This was evidence that the Borough's economy was not working - especially for our poorest families and communities. Community Wealth Building offered an alternative approach which directly sought to address the fairness in the Borough's economic system and wider society.

To engage with external health organisations ref to 6.3.1 - Preston model held up and learn a lot from this. Closer to home work with neighbours - Islington and Camden. Ref 103 and 104 manage expectation and key foundations in place to build the strategy and raise aspirations.

The Cabinet Member highlighted that the Community Wealth Building Approach:

- Firstly, put a greater emphasis on the levers the Council had within its own control. Procurement spend was the obvious starting place for this work. The Council was already leading the way in getting small and Medium Sized Enterprises into its procurements. The Council would continue to build on this and emphasise Social Value within its procurements. This was about maximising the public good from every pound the Council spent.
- Secondly, it reinforced and brought into sharper focus the question of who was benefiting from changes. For example, when looking at jobs in the borough, CWB focussed on the quality of those jobs and who was getting them above and beyond the number of new jobs created.
- Thirdly, it emphasised the need for partnership working with other anchor organisations who were invested in Haringey and its residents. Working together we can have a more significant impact. As Lead Member for Local Investment and Economic Growth, the Cabinet Member would drive forward this work with partners and look forward to having early conversations on how we can work together.

The Cabinet Member closed by emphasising that Community Wealth Building was an approach. Preston, the area in the UK which had fully embraced this approach, had seen tangible benefits over the previous 10 years. Many of the Council's neighbouring boroughs were actively developing their CWB approaches, which offered the Council a clear opportunity to work in partnership to improve the economic and social wealth of residents. Instilling community wealth building in what we do – haven reopened next year encouraging users to work on this.

In response to questions the following was noted:

- Paragraph 6.11 set out the time scale for measuring success of the KPI's and the implementation plan would be compiled following a decision at this meeting.
- The Council's current spend on procuring contracts with a Haringey business code was around 25% and £107m. The Council was aiming to increase this to 30 % over the next 5 years to around £130 – £140 million spend.
- The strategy would cater for small start-ups and will provide the enablers to do this. The strategy openly encouraged small start-ups through to medium sized businesses to access local preference funding. These businesses are also given preference in the procurement strategy.

The Cabinet Member looked forward to working with Overview and Scrutiny on measuring the success of this strategy and engaging with them on the review of milestones.

RESOLVED

To approve Haringey's approach to and definition of Community Wealth Building, i.e.

- Using all the Council's available levers, to make sure that every public pound delivers maximum public good and wherever possible builds the prosperity of local people and businesses as it travels through the local economy;
- Employing these levers to support and enrich Haringey's residents and communities, economically, through employment, and socially, with an emphasis on those who are struggling;
- Residents having more of a stake in public services and the Haringey economy;
- Working with partners, i.e. other public bodies, businesses and voluntary organisations, to embed a Community Wealth Building approach across the borough.

To agree key areas of implementation over the next year:

- focusing on five key priority areas – Procurement, Economic Development Strategy, Insourcing, Workforce Strategy and Asset Management;
- developing an approach to anchor organisations; and
- embedding the CWB approach throughout the Council.

Reasons for decision

Community Wealth Building has been identified within the Borough Plan as a strategic priority for the Council because a different approach to economic development is

needed to help achieve better outcomes for those who are most disadvantaged, and to create a better and more equal borough.

This decision will mark the launch of this work. A clear definition is needed of what is meant by Community Wealth Building in Haringey so that work can be prioritised and progress can be assessed, and to use as an expression of the Council's values that can serve as a call to action for local organisations, institutions and businesses that share the Council's values.

Alternative options considered

Do nothing

This is not considered to be a viable option given the commitment already made to Community Wealth Building in the Borough Plan, and the need to further define and then implement this approach.

38. SMALL BUSINESS LOAN FUNDS IN HARINGEY - ADOPTING A COMMUNITY WEALTH BUILDING APPROACH

The Cabinet Member for Local Investment and Economic Growth introduced this report which sought approval for the proposed Opportunity Investment Fund expansion to cover the Wood Green regeneration area and industrial estates in the east of the Borough.

The Cabinet Member highlighted page 127 of the report and noted that the Council was aware not all Small Businesses Loan Fund beneficiaries might succeed but this had been factored into the budget. However, that should not be used as an inhibitor to the Council seeking to assist small businesses through the small loan funds.

The Cabinet Member emphasised the need to support small businesses to grow and discussed the businesses along hermitage Road, such as Albion Knit, which had received a loan from the Council. It was noted that the Council would only support businesses it deemed to have a workable business plan that demonstrated how it would grow.

In response to questions from Councillor Connor, the following information was provided:

- Officers informed that the body which administered over the Small Loan Funds was primarily the Council's Regeneration and Economic Department, however, finance and legal also provided input given this was a corporate decision-making process. External advisors were also used to assess the business plans.
- Regarding the size of the team involved directly, Officers confirmed there were two support officers, each responsible for either the Opportunity Investment Fund and the new Productive Valley Fund. The support officers engaged frequently with the businesses in receipt of loans to ensure they were functioning as they informed the Council they would be and also to ensure the health of the business.

Officers would confirm to Councillor Connor in writing how many of the number of apprenticeships referenced at '*Objective 17b*' on page 125 had started.

RESOLVED

1. To agree that the Opportunity Investment Fund is expanded to cover the Wood Green regeneration area and industrial estates in the east of the borough in addition to the existing coverage of the Tottenham regeneration area for the reasons outlined in sections 4-5, so that the balance of Opportunity Investment Fund (£1.26M to date) and future repayments will also be eligible to cover businesses in this expanded area going forward.
2. To note the achievements of the Opportunity Investment Fund to date and the soon to launch Upper Lee Valley Productive Valley Fund, as well as the management arrangements of both funds.

Reasons for decision

A recent business survey in Wood Green found that almost three-quarters of them had plans for expansion, although not all of these will need public sector support to realise those plans. By expanding, OIF would support businesses to remain and expand in Wood Green and Tottenham and reduce the number of those needing to relocate outside of the borough.

Wood Green is also the borough's metropolitan town centre and a prime employment area with well-advanced Council and partner plans to enhance and improve the commercial space offer through a jobs-led programme of change which will bring forward a pipeline of commercial space over several years. Despite this, the demand for housing land, and values achievable through housing development, put existing commercial space, especially near major transport interchanges, under pressure and at risk of being converted to housing.

The town centre also neighbours areas of high socio-economic deprivation. Allowing OIF to expand to Wood Green would generate employment opportunities paid at London Living Wage (LLW) or above for local residents within close proximity of their homes.

By widening the scope of OIF to Wood Green and industrial estates outside Tottenham, the benefits of OIF will be accessible to many more businesses and cover the borough's two growth areas and major employment areas (the other being Tottenham).

The new PVF loan fund, covering the industrial estates in the Upper Lee Valley, enables OIF to expand to Wood Green, given that further applications from industrial estates in Tottenham can now be covered by PVF. 11 out of the 20 OIF loans awarded to date have been provided to businesses located in Tottenham industrial estates.

Reporting to Cabinet on the OIF loan fund and forthcoming PVF loan fund is timely in order to reaffirm and align their objectives to the Borough Plan, the Economic Development Strategy and to embed Community Wealth Building principles. Appendix 1 outlines achievements to date against various objectives.

The Council is committed to growing and sustaining the borough's business base and supporting local people to access employment opportunities created by the local economy – increasing jobs and commercial space. The loan funds enable businesses to access finance, where otherwise they may have been unable from conventional lenders, or to bring forward their expansion plans quicker. The loan agreements enable the Council to set targets for the business to deliver jobs (with LLW as a minimum), apprenticeships/traineeships, offer discounts and services to local residents and community groups, develop local supply chains with existing small businesses and create attractive, appealing destinations and services for people to enjoy and retain money in the local area. Businesses also sign up to deliver activities through the Tottenham Charter with local schools and colleges such as work experience, school visits and talks.

The recyclable nature of the funds mean that loan repayments are returned to the Council to loan out again to the next generation of applicants. It is a strong example of the Council ensuring that public pounds deliver the maximum public good.

The fund also helps to protect and enhance employment land in our town centres and industrial estates, modernising and intensifying our commercial areas and making our town centres more attractive and desirable to live, work and visit.

Alternative options considered

The following options were considered:

No change

OIF continues to be eligible only for businesses currently based or moving into Tottenham. This is not considered a desirable status quo.

Expand OIF over the whole borough

This is not considered the optimal solution as, despite its positive impact, the fund is relatively small in scale and will have a more intense impact focused on the larger areas of commercial activity in the borough (the major centres of Wood Green and Tottenham) and the larger industrial estates in the east of the borough. This would also put a strain on resources, expanding to cover such a large area. The current pot of OIF funding available to applicants stands at £1.26M as of now (which represents approximately 10-12 loans based on the average loan size awarded to date) and the anticipated return rate of 70% will mean the fund will see diminishing returns over subsequent years resulting in a maximum of 8-10 loans awarded over the next few years. The impact of this would therefore be diluted if spread over the borough as a whole.

Expand to cover Wood Green and Tottenham only

This option would allow the fund to focus on the borough's major commercial centres. However, this would exclude several industrial areas under pressure from residential and mixed-use development in the east of the borough.

Expand to cover Wood Green, Tottenham and industrial estates in the east of the borough

This is considered the preferred option for the OIF fund, covering, for the reasons outlined above, the major commercial centres and key industrial areas at risk of seeing a diminished commercial/employment offer. This steady expansion would also not put a strain on resources. Launching the PVF loan fund will provide the opportunity to expand the OIF area for the next three years as a minimum. Industrial estate-based businesses have so far received around half of the OIF loan funding to date, allowing the Council to widen the area of coverage of OIF at least for this fixed period.

It is proposed that this expansion is reviewed after 12 months (October 2020) to assess whether the area has been widened too far (diluting the place-making and commercial-space protection aspects of the fund) or not enough (needing to be expanded into other areas seeing an equally pronounced pressure on conversion/loss of employment space). The take-up of PVF and OIF will be considered in this review.

39. EXTENSION OF DISTRICT HEATING CONTRACT BROADWATER FARM

The Cabinet Member for Housing and Estate Renewal introduced this report which sought approval for additional funding for variations to the Broadwater Farm District Heating contract which was approved by Cabinet on 14 August 2018.

The Cabinet Member noted that since the health and safety issues at Broadwater Farm became known, the Council had taken action to manage the risks and ensure the safety of residents. This included the replacement of all gas cookers, estate wide door knocking and engagement, the fitting of gas interrupter valves and the decant of two blocks. This report related to the ongoing works to install a new modern District Heating system on the estate. Since the inception of the project, officers had identified a number of enhancements to the programme to improve outcomes for residents and the quality of the upgraded heating system. These are detailed at paragraph 6.7. This report sought to extend the existing contract to allow for these additional works to be completed.

In response to questions from Cllr Connor, the following information was provided:

- The decant of Northolt block had started but completion would not be according to the same level of urgency as Tangmere. This was due to there being no piped gas in this block
- Disruption to residents was acknowledged by the Cabinet Member. This was further acknowledged to be a really challenging time for residents in Broadwater Farm with different works taking place at the same time. The Council were regularly exchanging information with residents and making sure information was available on the works and their impact. Ultimately, the Council had to ensure all the tenants were living in safe homes. There was a need to be

realistic with residents about the scale and timing of the works. In particular the enhancing works being completed on the heating systems was to ensure that additional works were not needed in 10 years' time.

- In relation to the decant at Tangmere Block, the latest information indicated that there were 12 leaseholders remaining. Homes for Haringey had agreed terms for moving 6 of the leaseholders. It was expected to agree terms with the remaining 6 leaseholders.
- The decant of Northolt Block had a longer timescale. This had started with 53 of 83 tenants moved or moving. There were 14 leaseholders, and Homes for Haringey had agreed terms with 1 leaseholder. It was noted that Homes for Haringey staff would be referring to the experience of Tangmere leaseholder decant and were confident of making acceptable housing offers to the remaining 13 leaseholders.
- Officers outlined that the new heating supply also provided an opportune time to replace some needed bathrooms and kitchens in Broadwater Farm. It was noted that 260 out of 830 tenants would have brand new kitchens or bathrooms or both by February 2020. The other works concerning the district heating system were due to complete in November. A further piece of work being included with the heating works, were changes to the cold water supply so that there was a single cold-water supply to people's dwellings. These works would have been needed to replace stored water supply in tanks in roofs. Also fire stopping works had been identified when completing survey works for kitchens and bathrooms and these works had been brought forward.

RESOLVED

1. To approve the variation of the District Heating contract with Engie LTD (formerly Keepmoat LTD) of an additional £5,531,172. More details of the variations required are set out in section 6.7 of this report.
2. To approve the additional consultancy fees of £180k as set out in paragraph 10.1 in this report.
3. To agree not to seek to recharge leaseholders their proportion of the cost of these works

Reasons for decision

The nine medium rise blocks on Broadwater Farm (Croydon, Debden, Hawkinge, Hornchurch, Lymington, Manston, Martlesham, Rochford and Stapleford) have failed structural tests for Large Panel System buildings.

To mitigate the risks, Cabinet gave authority to enter into the contract with the contractor on 14 August 2018. The work set out in the original contract was established following structural surveys which identified that it was not safe to have individual gas supplies within each flat on Broadwater Farm.

The project was divided into two substantive elements. Firstly, the Council was required to remove all gas supplies from flats and replace them with a new heating

system by the end of October 2018. This deadline was set by the statutory gas body, Cadent (who have statutory responsibility for the provision of gas supplies) and required the switch over of 725 flats from gas to district heating over a six week period (this deadline was met last year).

The second element of the scheme was to complete the site wide distribution of the new energy network and upgrade the energy centre, from which the new network would be powered. The current forecast date of completion for this element is November 2019.

Due to the time constraints, officers focussed on developing a detailed strategic design for the heating system in the absence of some survey data, such as survey data within flats and survey data of the other mechanical and electrical systems across the estate

Since the project has commenced, a number of technical opportunities and constraints have arisen which have allowed Homes for Haringey to amend its approach. These have led to the variations in 6.7. The variations mean that Homes for Haringey will be delivering additional works for residents and reducing future disruption.

Alternative options considered

The option of undertaking this work under a separate contract was considered but was discounted on the basis that it would: -

- Prevent the technical completion of the existing agreed district heating contract. For example:
 - Fire stopping in flats is essential where compartmentation issues are identified
 - Renewal of floors where they have collapsed is essential to upgrade kitchens and bathrooms
 - Renewal of kitchens and bathrooms essential as re-piping of water pipes required removal of units. Due to condition some units are impossible to retrofit.
- Cost the council considerably more to deliver if separated out into different contracts. For example:
 - Returning to flats to complete kitchen and bathroom upgrades would require additional visits from contractors which would be an additional cost to the Council.
 - Similarly, returning to flats to upgrade water supplies to the bathrooms and separate WCs would require additional visits from contractors which would be an additional cost to the Council.
- Cause considerably more disruption to residents if delivered through a separate contract. For example:
 - Doing as much work inside people's flats at the same time reduces the number of visits required to people's flats and the amount of disruption each resident experiences. By upgrading all water supplies, kitchens, bathrooms and WCs where necessary, we reducing the number of times we are disrupting the residents.

- Returning to flats to complete kitchen and bathroom upgrades would leave residents without essential services for an unacceptable period of time

40. APPOINTMENT OF MASTERPLANNERS FOR THE SELBY AND BULL LANE PROJECT

[Councillor Chandwani – left the Chamber]

The Leader of the Council introduced this report which sought approval to appoint the recommended contractor, Contractor B, to undertake a Masterplanning exercise and design development across RIBA Stage 0-3+.

The Leader started by noting the Council and the Selby Trust had developed a high-level vision to create an integrated, inclusive, healthy, sustainable, diverse and connected urban village on the sites of the Selby Centre and Bull Lane Playing Fields. The proposed mixed use development on the Selby Centre and Bull Lane sites had the potential to deliver up to 200 new homes, including council housing (approx 50%); re-provision of the Selby Centre in a new dedicated community hub; new retail, and sports and recreation facilities in the adjacent Bull Lane Playing Fields.

The Leader noted the Selby Urban Village project was an ambitious development arising from a shared aspiration between Haringey Council and the Selby Trust to deliver a community focused, mixed-use scheme on the Selby Centre and Bull Lane Playing Field sites and would support the Council's Priorities set out in the Borough Plan.

The Leader highlighted that this scheme was an example of the Council's commitment to building new homes and in particular council homes and improving living standards for, and in partnership with, the local community, to ensure they could participate and benefit from the investment in their neighbourhood. For the Selby Centre this is a great opportunity to improve the existing provision for the community. By being part of the co-design and delivery of a centre and building, in which the Trust and its users really thrive and continue to be a valued asset to the community. The inclusion of Bull Lane (Playing field) as part of the re-development, could deliver significant improvements to the area, including state-of-the-art community sporting provisions – enabling local people to participate and enjoy recreational and sports activities within their neighbourhood.

In response to questions from Councillor Connor, the following information was provided:

- Regarding the £1.4mil budget for the Selby Urban Village Project, the Leader informed there was a joint project board with the Council working with Selby which would have an input into how that money was spent. However, the Council would make any final decision, following input by the Board.
- The Leader accepted traffic was an issue and noted there was to be a buses service review for the entirety of North London. The Council would be seeking to address areas where there could be an improvement to public transport, however, Selby was not, at present, an area marked for any prospective bus

routes. Following the review, the Council would be looking at which areas could be better served by public transport. It was hoped the development would minimise the use of cars and the Leader noted there would be no through route across the site.

- Officers noted that, if the project was to be delivered by the Council Housing Programme, then it would be delivered by the Council and not Homes for Haringey (although it was expected Homes for Haringey would manage the homes, in that situation).
- Regarding the type of businesses that would form part of the Selby Urban Village, Officers informed this would be contingent on a number of factors, such as the needs of the local community, what was viable, and the space required by the businesses.

Following consideration of exempt information,

RESOLVED

1. To approve the award of the contract to undertake Masterplanning and Design Development work to the successful tenderer (Contractor B) in accordance with the provisions of the Council's Standing Order (CSO) 9.07.1(d) for a total sum of £741,666.20;
2. To create a capital scheme called the Selby Urban Village Project with a budget of £1.4m; and
3. To vire £1.4m from the Strategic Regeneration & Community Assets scheme to the Selby Urban Village project.

Reasons for decision

The Selby Urban Village project arises from a shared aspiration between Haringey Council and the Selby Trust to deliver a community focused, mixed-use development on the Selby Centre and Bull Lane Playing Field sites. The proposed development will comprise the re-provision of the Selby Centre's community hub in a new building, and new housing, including Council homes, along with sports and recreation facilities. Both sites are in the ownership of Haringey Council, although the adjacent Bull Lane Playing Fields is located within the administrative area of the London Borough of Enfield.

Following a competitive tender process, a preferred bidder has been identified to undertake Masterplanning and design development work across RIBA Stage 0-3, including the preparation and submission of two planning applications to LB of Haringey (Selby site) and LB of Enfield (Bull Lane playing fields).

There will be a clear gateway contract break clause at the end of each RIBA Stage to review the central viability of this mixed-use scheme, as a whole. This will take into consideration financial, planning and community priorities as the scheme progresses and making a recommendation on next steps.

Alternative options considered

The authority procured the contract through LOT 4 of the GLA's ADUP and TFL framework. The authority considered the use of alternative procurement options but upon consideration, and due to time constraints, it was decided to proceed with the ADUP Framework.

41. DELEGATED AUTHORITY FOR PROCUREMENT OF PROFESSIONAL ADVISORS FOR DEN PROGRAMME

[Cllr Chandwani re-entered the chamber]

The Cabinet Member outlined that the DEN programme was the single largest contribution the Council could make to reducing carbon emissions in Haringey. This procurement of a team of technical, financial, and legal experts would enable the Council to deliver this ambition and would meet the Borough Plan commitment on exploring setting up an energy services company to deliver affordable, low carbon energy over the coming years and this paper makes recommendations for appointments and explains the procurement processes followed.

The Cabinet Member highlighted the scope of work considered here was therefore focussed on Wood Green, Tottenham Hale, Broadwater Farm and the Council's other housing and regeneration projects many of which would involve decentralised energy networks. If the GLA's budget expired in 2020, the Council had the option to either vary the new contracts to include the North Tottenham work or to novate the existing North Tottenham contracts from the GLA to the Council.

The Cabinet Member informed this report would allow the Council to agree an initial scope of work and then to instruct follow-on work through the same contract in due course. The scope (and therefore cost) of future work was likely to be determined by work over the next 12-18 months. Once the scope was clarified, a price for the work can be agreed with the consultants before being presented to the Council as part of the decision to proceed and release additional budget.

The Cabinet emphasised this approach would deliver value as it allows:

- Better rates through aggregating work into a larger contract;
- More interest from the market in a larger piece of work; and
- Continuity in advice including lessons learned on one project being applied to another Work to be instructed more quickly with less risk of opportunities being missed due to delay and less internal resource spent re-procuring.

In response to a question from Cllr Connor on why five of the six bidders who engaged with the procurement process declined to bid, it was agreed to provide a written response.

Following consideration of exempt information,

RESOLVED

To approve the implementation of Contract Standing Order 9.07.1c. and award two contracts for:

- a) DEN technical advisory services to Bidder A ,set out in the exempt report for a period of 3 years from 1/11/19 to 31/10/22, with provision for extension for 12-months. The contract allows for work to be instructed incrementally with additional fees determined by the precise scope of work. The contract value over the life of the contract (contract period + extension) is estimated to be up to £1m. The first phase of work which will be instructed has a value of c£270k.

And

- b) DEN legal advisory services to Bidder 1, set out in the exempt report, for a period of 3 years from 1/11/19 to 31/10/22, with provision for extension for 12-months. The contract allows for work to be instructed incrementally with additional fees determined by the precise scope of work. The contract value over the life of the contract (contract period + extension) is estimated to be up to £1m. The first phase of work which will be instructed has a value of c£120k.

Reasons for decision

These appointments contribute directly to delivery of Borough Plan objectives to reduce Haringey's carbon emissions, to lead on delivery of an energy network within the borough, to explore setting up a local energy company and to develop a plan for Haringey to be Zero Carbon by 2050. They also allow the Council to meet commitments in the Local Development Framework and undertakings within s106 agreements to engage with developers in Wood Green and Tottenham Hale on set-up of DENs.

In each case, the awards are based on an assessment of Most Economically Advantageous Tender (MEAT) as required for contracts of this size. Strategic Procurement confirms the processes set out in the tender documents are suitable and have been followed correctly.

Budget has already been approved (as part of the capital programme) for the first phase of work to be instructed, including an allowance for the accompanying financial advice work packages which will be approved in parallel under Delegated Authority by the Director of Housing, Regeneration & Planning. Future phases of work will follow on only after further decisions to progress the project to the next stage, and will require either confirmation that budget is in place or the seeking of additional budget).

Alternative options considered

Do nothing

This would not deliver a step change in carbon reduction and would not enable the Council to deliver a regional energy savings company as set out in the Borough Plan.

Appoint an in-House Team

This was ruled out as there is a need for specialist knowledge with a limited pool of candidates. The work also requires a broad skillset and ideally a blend of junior and

senior input. This lends itself to a small team of a dozen or so individuals working part-time rather than a small team of in-house staff working more intensively. Outsourcing gives the Council some liability protection through professional indemnity. Also, the external funding streams (such as the GLA's DEEP Framework and HNDU funding) does not allow for in-house appointments.

Run multiple small procurements on an as and when basis

This would slow down the DEN programme and may not keep pace with linked external projects and funding streams which is likely to see opportunities slip away. And it would be time consuming in terms of officer time. It would not be able to link efficiencies between projects. Therefore it was ruled out.

Use other frameworks to deliver the teams

In terms of the choice of framework, while there are other options, the DEEP framework is preferred. It includes a comprehensive list of firms active in the specialist field of DENs and has the USP that its use allows the GLA to fund some or all of the work. It is a requirement of the GLA's DEEP funding (which runs to March 2020 and may be renewed for the period 2020-23) that services are procured via the DEEP framework. LBH has received c£340k of funding from the GLA to date and hopes to secure more. It is therefore difficult to look past DEEP as use of this route provides a clear financial benefit to LBH.

This framework (Schedule 6B) is a three-party agreement between the appointed Service Provider, GLA and Haringey, under which the service provider may be paid by either the GLA or Haringey. This allows the Council to take advantage of current GLA funding of £45k and future GLA funding should it become available.

42. EXTENSION OF THE AUTUMN GARDENS & ANASTASIA LODGE CONTRACTS

The Cabinet Member for Adults and Health introduced this report which sought an extension of the Autumn Gardens and Anastasia Lodge contracts. The existing contract allowed provision for a further 12-month extension, and this report would seek Cabinet approval to both extend the contract within existing terms and further extend the lifetime of the contract by 12 months. Extending the block for a further 2 years ensured that the Council achieved good value from culturally specific placements.

The Cabinet Member highlighted that continuing these block contracts would both secure capacity for nursing and residential care and most importantly enable specialist provision to be available locally to Haringey residents. Further, in the challenging financial environment, this proposal supported efficient market management and an ability to maintain costs in a planned way.

The Cabinet Member closed by noting that Anastasia lodge and Autumn Gardens were the only local homes which provided specialised care and support of Greek and Cypriot older people. In Haringey, there was a high demand for such housing support.

In response to questions from Councillor Connor, the following information was provided:

- Officers informed that, insofar as residents needing nursing care, it was envisaged that Osbourne Grove Nursing Home would assist in providing that care once it had been rebuilt.

RESOLVED

1. To approve, pursuant to Contract Standing Order 10.02.1(b), the variations to allow a further extension period of one year in order to execute a 2 year extension of the contract with Ourris Residential Homes Ltd for 18 residential beds at Anastasia Lodge and a 2 year extension of the contract with Ourris Properties Ltd for 21 nursing care beds at Autumn Gardens.
2. To approve the commencement of the extension period to start on 28th November 2019 and run to 27th November 2021.
3. To approve the value of the block contract with Ourris Residential Homes Ltd for the provision of care at Anastasia Lodge over the 2 year extension period at £1,400,272, bringing the total value of the contract to £2,695,430, over the four year period.
4. To approve the value of the block contract with Ourris Properties Ltd for the provision of nursing care at Autumn Gardens over the 2 year extension period at £2,244, 628, bringing the total value of the contract to £4,489,256 over the four year period.

Reasons for decision

The market for residential and nursing care is largely a sub-regional one and the Council commissions nursing and residential care for its residents across North Central London (Barnet, Camden, Enfield, Haringey and Islington). As with neighbouring authorities, Haringey commissions across this area in order to meet demand and to respond to specialist needs

In order to ensure both capacity and flexibility, the Council is keen to have a mixed economy of spot and block purchase arrangements in place. Many placements are commissioned on a spot purchase basis, but the proposal set out here – to continue and expand two existing block contracts – reflects the need to maintain capacity for a particular cohort of the population, notably Greek and Cypriot older people, and to ensure best value in commissioning this provision.

Anastasia Lodge and Autumn Gardens are homes which offer culturally specific provision, catering largely – but not exclusively – for residents of Greek or Cypriot heritage. They are the only residential and nursing homes in the sub-region offering such specialist provision and Haringey has considerable demand for such placements.

Due to the unique position in the market the Council awarded a block contract to Ourris Properties for a period of 2 +1 years in November 2017 to cover nursing care

beds and to Ourris Residential Homes Ltd for the same period for residential care beds. The contracts will expire on 27th November 2019.

Approval is sought to vary the contracts so that the extension period runs to 27th November 2021 and so that the annual value can be increased from £1,769,893 per annum to £1,822,450 per annum which represents a 3% increase overall for the two contracts.

The costs for residential care will increase from £690 per week to £746 per week. Extending the contracts for a 2 year period will hold these rates for the Council which is compares favourably with the rate for spot purchasing this type of care, which is £1400 per week for nursing care and £800 per week for residential care.

The Council has managed two block contracts with these providers for the last year and has maintained very high levels of occupancy, with the home rated 'Good' by the Care Quality Commission (the CQC) throughout this period with consistently good levels of quality.

As well as securing both nursing and residential care provision for the future, the arrangement also ensures that commissioning rates for existing residents can continue to deliver best value.

Alternative options considered

An option is for the Council to 'do nothing' and let the contracts lapse at the end of the period. This would result in the existing block contracts with the provider lapsing and the Council having to either pay an increased spot rate to the provider or find alternative accommodation for the residents, which are likely to be at significantly increased rates. Either option would create issues, be that a budget pressure for the former, and significant disruption to residents for the latter. Doing nothing and allowing the block contracts to lapse would also deprive the Council of being able to offer other Greek & Cypriot residents the choice of living in a culturally specialist care home; whereas a block would secure supply and allow the Council to do so.

An alternative option is for the Council to extend the contracts for 1 year only which is compatible with the provisions of each of the contracts regarding extension. Given the pressure on capacity and the requirements to safeguard provision for this cohort of residents going forward, the Council is keen to optimise the opportunities of the block arrangements for the additional period as set out in this report.

43. AWARD OF CONTRACT FOR THE PROVISION OF THE CUSTOMER PLATFORM

The Cabinet Member outlined that the Council currently used 'My Account' to manage its main online (resident) accounts, dealing with over 110,000 registered users transacting on several services including revenues, benefits, libraries, environmental reporting and payments. The contract for provision of the Agilisys Digital system was due to end in March 2020.

The Cabinet Member further advised that the new Customer Platform procured under Crown Commercial Service's (CCS) G-Cloud 11 Framework will provide Residents, Businesses, Landlords and other groups' access to a range of Council services. It will deepen and broaden the digital services available, managing and tracking customer enquiries, service requests and 'one and done' transactions. This included the services already provided through 'My Account' and additional service areas including Parking and Housing.

In closing, the Cabinet Member informed that the Platform would deliver significant financial and non-financial benefits to the Council and customer groups including:

- Supporting identified annual savings in the FOBO Programme of circa £300,000 and a saving in the current annual platform license fee cost of £53,750;
- Potential for further savings in Corporate & Customer Services and other Council services;
- Improving the digital offer for customers, making more Council services accessible online, providing customers better access to services and updates at their convenience;
- Providing a simple, intuitive and personalised system to use which becomes the desired channel for accessing Council services. Improving the overall experience of using digital services;
- Managing and tracking customer enquiries, service requests and end to end transactions, regardless of if the customer is transacting through a customer account; and
- Generating easy to understand management information to support service development.

In response to questions from Cllr Connor, the following information was provided:

- In relation to the total number of residents living in the borough, in comparison to the number of registered users transacting services with the Council through digital means, it was important to note that not every single resident would need to make payments to the Council and there will likely be one person in the household that would be responsible for making payments. In addition, it was important to ensure that residents that can access and to use IT make full use of the digital means available for their transactions with the Council, to free up customer service resources to support people that are less able to access services.
- The Cabinet member acknowledged the important issue raised on residents that the Council were wanting to attract to access online portals. The Cabinet Member would provide this information to Cllr Connor.
- Migration issues were likely but due to the benefits of the new system these were accepted and would mitigate this as much as possible. When residents access their account, they will go to onto the new system and re log on. This re-register also ensures customer data is updated.

Following consideration of exempt information,

RESOLVED

To approve, in accordance with Contract Standing Order (CSO) 9.07.1(d), the award of a contract for the supply and support of Customer Platform software to supplier A for a 2 year period at a maximum cost of £518,938 with options to extend for up to 2 further 1-year periods at an annual maximum cost of £179,250 per additional year for a total cost not exceeding £877,438.

Reasons for decision

The current contract for My Account was awarded in March 2015 for 3 years with an option for a further 2 years to March 2020. The optional additional years were agreed and therefore, a new contract is required.

The new contract will significantly enhance the digital service offer to customers making it easier to access and receive updates on Council services. The platform directly supports identified annual savings in FOBO of £300,000 with the potential for future savings and provides a saving in the current annual platform licence fee of £53,750.

Alternative options considered

Do nothing

This is not a viable option as the current contract for the existing customer platform expires on 27th March 2020. There are approximately 16,000 customer transactions through the platform with the Council per month, therefore customers would be disadvantaged, and in direct contrast to public expectations, if we were to withdraw this service.

Renew existing contract

The existing contract has already been extended to the maximum amount of time allowed within OJEU regulations, therefore this option is not viable.

44. AWARD OF CONTRACT FOR PROVISION OF SAP MANAGED SERVICE

The Cabinet Member for Corporate and Civic Services introduced this report which sought approval to award a contract, for a term of 2 years with an option to extend for 2 further 1-year periods, by way of a call-off from the Crown Commercial Service's GCloud 11 framework to replace the current SAP managed service supplier. The new contract would facilitate the continuation of critical SAP support and hosting for the Finance, Payroll, HR and Procurement systems.

The Cabinet Member noted the spend on SAP represented a significant revenue cost for the Council. However, the services from the proposed new supplier, which already provided licensing for SAP and provided hosting and support services that met the

Council's requirements, represented a saving of over £1.2m over a maximum four-year contract term.

The Director of Customers, Transformation and Resources, added that the Council's SAP system had different providers for the host system and the license to use the system. The new supplier would provide both the hosting of the system and the license to use it. The Council was confident the supplier would provide a quality service and the contract provided significant savings for the Council.

In response to questions from Cllr Adje, the following information was provided:

- Regarding the 2+1+1 year structure to the length of the contract, Officers noted the software the Council was running would be superseded in the next couple of years, at which point it would be looking to move to a new system. It generally took 2 years to specify and re-procure the system. The +1+1 would provide the Council with flexibility if it was not ready to launch that new system within 2 years. The Council had the option to go 2+2 but 2+1+1 gave the Council more flexibility.
- Officers were confident the savings proposed would be met and highlighted the supplier already worked with the Council. There would be no data migration involved, due to it being a service the Council already used.

RESOLVED

To approve, in accordance with Contract Standing Order 9.07.1d), the award to the supplier identified in the exempt report of a contract for SAP hosting and support services for an initial 2-year term valued at £533,816.00 with an option to extend for two further one-year periods valued together at £533,816.00 with a total contract value of £1,067,632 over the maximum term of 4 years.

Reasons for decision

The current SAP managed service contract with HCL Axon expires in March 2020 and so the Council needs to either extend the current contract or replace it with a new contract with an alternative supplier.

The incumbent supplier was only able to offer a minimal reduction of just £16k per year.

Haringey already have a satisfactory relationship with the proposed supplier.

The proposed supplier are able to provide an equivalent service to the current one at £330k per annum less than the incumbent supplier.

Alternative options considered

Request the incumbent supplier to review its pricing model to reduce the costs for the final 4 optional extension years to see if savings could be made

This did not achieve any significant savings and does not meet the savings target.

Request an alternative supplier(s) to provide a quotation so as to compare costs against the current service to see if this proves advantageous enough to move the service

This achieved significant saving which the incumbent was unable to match.

Look to expand the current insourced SAP support team to take on this specialist role

This would require expensive specialised SAP resources to be recruited that would not be fully used. Haringey already have the SAP in-house team to manage most of the administration of the system – this contract is only from specialist SAP support. So the Council already has the correct level of in-house arrangements for the application. This contract is for very specialist SAP support and hosting. It is not an economically viable option to maintain these sorts of skills as part of the Haringey Digital Services section.

Do nothing

This is not a realistic option. This would mean that we would not have a Finance, Payroll, HR, and procurement system.

45. AWARD OF CONTRACT FOR THE HOMES FOR HARINGEY MAJOR WORKS YEAR 2 PROGRAMME, 3 LOTS

The Cabinet Member for Housing and Estate Renewal introduced this report which set out an overview of the External Capital Investment Programme for Year 2 and sought approval for the award of contracts for the Housing Asset Investment Plan for Year 2, 2019/20.

The Cabinet Member highlighted that this award of contract enabled Homes for Haringey to progress the external capital investment programme for year 2 (2019/20). This would enable external works such as the renewal of roofs, windows, external brickwork repairs and improvements to communal areas. It was noted that improving communal areas was a common request from residents to councillors and the far reaching impact of updating these areas in terms of tackling crime were also

acknowledged. Additionally, by incorporating communal and environmental works within the programme, this will improve the lives of residents on our estates.

At this point in the meeting, Cllr Chandwani declared a personal interest, as a Homes for Haringey leaseholder.

In response to a question from Cllr Connor, officers advised that the selected contractors were FENSA recommended.

RESOLVED

To approve, pursuant to the Council's Contract Standing Order (CSO) 9.07.1(d), the award of the contracts in respect of the External Major Works Year 2 Programme A, B and C.

- Programme A for renewal of roofs, windows, external brickwork repairs and improvements to communal and external areas at a total cost of £5,231,064.82.
- Programme B for renewal of roofs, windows, external brickwork repairs and improvements to and external communal areas at a total cost of £5,774,875.42.
- Programme C for renewal of roofs, windows, external brickwork repairs and improvements to and external communal areas at a total cost of £5,594,154.97.

Details of the successful tenderers are outlined in Part B (exempt information) of the report.

Reasons for decision

In line with the Council's plans to invest in the Housing stock, Homes for Haringey intends to deliver the three packages outlined in the report through an external and communal works programme. The report recommends the appointment of two contractors to work with Homes for Haringey to deliver the capital investment programme for Year 2 (2019/20).

Homes for Haringey require approval for the award of contracts to deliver the year 2 external capital works programme. This is following a tender process in conjunction with Haringey Council Procurement, via the London Construction Programme (LCP) framework and processes.

The tender process was carried out in accordance with the framework requirements that incorporate price and quality. The successful bidders scored the highest points in relation to these criteria in each associated tender lot.

Alternative options considered

An alternative option would be for Homes for Haringey either to use third Party industry frameworks or an OJEU compliant tender process to deliver the capital programme. Homes for Haringey sought support and advice from Haringey Strategic Procurement and determined the LCP framework as being the optimum route to the market. This was due to the speed of access to quality-checked contractors and focus on companies that focus their resources in the local area.

A do-nothing option would mean the Council is not able to deliver external capital investment works to the housing stock. This is in accordance with the agreed Asset Management Strategy (see link in section 12.2) and the condition of the stock would be likely to deteriorate significantly.

46. PROPOSAL FOR THE AWARD OF CONTRACT FOR THE DELIVERY OF A PUPIL REFERRAL UNIT PROVISION: SEPTEMBER 2019 TO AUGUST 2020

The Cabinet Member for Children and Families introduced this report which sought authorisation for a direct one year contract award without prior publication of an advertisement to TBAP Trust (TBAP) for the delivery of Haringey's Pupil Referral Unit (PRU) for one academic year.

The Cabinet Member advised that this proposal sits within the context of an on-going strategic review of Alternative Provision, in its widest sense, and a real drive to transform the outcomes for children and young people who had been excluded or were at risk of exclusion from school.

The Cabinet Member highlighted this extensive and strategic review was due to report by the end of this calendar year. It would provide recommendations for alternative commissioning arrangements for children and young people who need to access alternative provision. These would be brought to Cabinet in due course. In the meantime ensuring a one year contract for this academic year would enable the Council to meet its statutory duties in relation to children and young people who were in need of alternative provision, whilst doing the necessary parallel planning for the new arrangements to be introduced from September 2020.

In response to questions from Councillor Tucker, Councillor Connor and Councillor Ibrahim, the following information was provided:

- The Cabinet Member noted it was the intention of the on-going strategic review of Alternative Provision that this return inhouse. The preference from the review was that Alternative Provision would be provided in an entirely different way by the Council itself.
- With regard to TBAP Trust and its financial situation, the Cabinet Member confirmed that Officers had been requested to ensure a Plan B be established, should this company be unable to fulfil the terms of the contract.
- The Cabinet Member noted the length of the contract was for one year, which would allow for the completion of the strategic review of Alternative Provision.
- Regarding due diligence, Officers confirmed they had been working with the Department for Education (DfE) and the Trust to ensure that the Alternative Provision was provided to the standard it expected. Discussions were ongoing across the Council with its Finance and Legal teams to ensure contingency measures were in place, should they be required.
- Regarding the central government's contribution towards The High Needs Block, the Cabinet Member informed this was expected to be around £4m. In discussing the deficit of Haringey's High Needs Block, it was noted this was not unique to the Council and many other local authorities operated this with a deficit. The Council was continuing to campaign for more money from central government.

- Regarding how the success of the contract would be measured, Officers noted it would be measured against the educational performance of those attending the PRU. The Council would also look at how productive the PRU was in promoting reintegration for children into mainstream settings.
- The Cabinet Member noted discussions had been held between herself and the Monitoring Officer regarding the safeguards in place, should TBAP Trust's financial position worsen and the impact that could have on Haringey's PRU. Continuing to ensure that adequate provision was arranged and having a contingency plan in place would continue to be a paramount concern for the Cabinet Member.

Officers would confirm in writing to Councillor Ibrahim the specific legal protections built into the contract that ensured TBAP Trust could not simply offload Haringey's PRU to another academy chain.

RESOLVED

To approve, pursuant to the provisions of CSO 9.01.2(g) and in accordance with CSO 9.07.1(d), the award of the contract for the provision of Haringey's Pupil Referral Unit (PRU) to TBAP for a period of one academic year covering the academic period 1st September 2019 to 31st August 2020 at a total cost of not exceeding £857,580.00.

Reasons for decision

The recommendation for Cabinet to agree the proposal to award a contract for one year only to TBAP is made on the basis that:

- A Strategic Review of Alternative Provision is underway which will lead to new arrangements affecting longer term commissioning of a PRU for Haringey and this approach will enable the continuation of educational services for some of the most vulnerable young people in the borough whilst it reaches its conclusion in autumn 2019. The wide-ranging review encompasses fresh consideration of the current delivery models for existing PRUs within the borough. It is anticipated that one outcome of the review will be a set of recommendations that will be put forward to Cabinet later in the year, including proposals for the longer term approach to and delivery model for PRU provision in Haringey.
- This would maintain the Council's ability to fulfil its statutory duties in relation to the arrangements for the provision of suitable education at school or otherwise for those children and young people permanently excluded from school or at high risk of permanent exclusion from school. The award of a contract for one academic year only will support the Council's ability to manage the transition from existing arrangements to any future arrangements in a way that reduces the risk of disruption for the children and young people being supported via the PRU.
- taking into account the above, and the complexity of the provisions of the Academy Arrangements 2010, making preparations for the re-provision of the PRU in the longer term requires more time. Initial testing of the market for a short term commission through a Prior Information Notice yielded little interest

and were anyway rejected on the grounds that they could lead to a disrupted education for vulnerable children and young people in the borough.

Alternative options considered

An alternative option would have been to undertake a competitive tendering exercise to secure a longer term provider of the PRU service working to the same model as currently from September 2019. However, this was not considered to be a viable option as the Alternative Provision Review will lead to change which will need to be reflected in the future model for a PRU.

47. SEEKING APPROVAL TO AWARD BLOCK CONTRACT FOR IN-BOROUGH NURSING PROVISION

The Cabinet Member noted this report sought to secure nursing home provision for local residents in-borough for the next three years at a sustainable rate. This block contract would ensure the Council had high quality local provision, offering local employment and opportunities for career progression ensuring older people can remain in their local communities as far as is possible and if they need residential care.

In response to questions from Cllr Connor, on the use of Block contracts to provide care, it was noted that there were incentives in place to providers to provide good care as these arrangements gave them a guaranteed income. Certainty in the market was important and providers knowing they have an arrangement to fund the periods where there is lower demand. Therefore, this was an important mechanism for providers. This was also a negotiated position and arrived at from considering the fair cost of care. The Council were working with colleagues across the NCL boroughs to ensure each were paying reasonable rates with a focus on quality and outcomes achieved. This was also a teaching care home, which was positive for Haringey.

Following consideration of exempt information,

RESOLVED

To approve, pursuant to Contract Standing Order 10.02.1b, the award of contract to Magicare Limited for 61 nursing beds from 1st November 2019 to 30th October 2022, with the option to extend for a further 2 years in 12-month intervals, at the rate of £950 per week. The total cost of the contract over 5 years would be £15,412,751.

Reasons for decision

The market for residential and nursing care is very tight at the moment and demand in the sub-region (Barnet, Camden, Enfield, Haringey and Islington) outstrips the supply of nursing beds. Priscilla Wakefield House is one of only two nursing homes in Haringey and the only one, which is currently rated at Good or above. The home is rated 'Good' by the Care Quality Commission (CQC), and was recently named as one of the prestigious and innovative new cohort of 'teaching care homes' by the Foundation of Nursing Studies: <https://www.fons.org/resources/documents/Teaching-Care-Homes/TCH-Yr-3-Teams-Announced.pdf> The selection of Priscilla Wakefield

House as a teaching care home, is a mark of the confidence placed by the Foundation of Nursing Studies in the quality of leadership and management at the Home.

Councils have a duty to shape their local marketplace and offer choice to local residents. Establishing a block contract with Magicare Limited is an important means of securing local beds for Haringey residents. The only other nursing home in Haringey is currently under a temporary embargo because of concerns notified by the CQC. There is no other home in the sub-region able to provide this number of beds to Haringey Council.

In order to ensure both capacity and flexibility, the Council is keen to have a mixed economy of spot and block purchase arrangements in place. Many placements are commissioned on a spot purchase basis, but the proposal set out here – to continue and expand a block contract – reflects the desire to maintain capacity in Haringey and to ensure best value in commissioning this provision. The Council has been working closely with the provider over a period to sustain improvements in the quality of care provided and will continue to monitor the contract closely to ensure high quality standards and the achievement of outcomes for residents.

As well as securing nursing care in Haringey provision for the future, the arrangement also ensures that commissioning rates for existing and future residents can continue to deliver best value and be maintained at an affordable rate.

The Home is a significant local employer and has participated fully in the development of the North Central London Proud to Care Portal which seeks to attract a more diverse range of people, including young people, to join the care sector and to ensure a stronger focus on skills development and career progression. This has involved working closely with the local further education sector to grow skills and knowledge and to present the care sector as an attractive career route. As a teaching care home, the only one in London, the potential for the Home to develop the skills of local residents as valued employees in the care sector and to offer a strong social value package is being included in the contract arrangements. In line with the Council's approach to Community Wealth Building, the Home offers a range of benefits to local residents keen to join the care sector as well as to potential residents and their carers and contributes to the local Haringey economy.

There are 77 Haringey residents currently living at Priscilla Wakefield House, delivered by Magicare Limited. They are all extremely vulnerable and frail and many are very elderly. It would not be possible to find alternative nursing care accommodation in the borough for these residents or in boroughs adjacent to Haringey, where existing residents would be able to live together and to receive the same quality of care.

Alternative options considered

One alternative option is for the Council to 'do nothing' which will see the continued reliance on spot purchases and the risk of a significant increase in expenditure over the proposed period of this contract. This would result in the Council having to pay either an increased spot rate to the provider or find alternative accommodation for the residents, which would currently be outside of Haringey, at rates which are not known,

but are likely to be significantly increased and in provision which has not yet been identified.

A second option would be to tender for an equivalent scale block contract for the provision of a local nursing home. There is no other nursing home in the sub-region, however, which can put forward a tender proposal at the scale required or close enough to the Haringey borders to be considered local. In addition, there are insufficient grounds for the Council to seek to move any resident from the provision delivered by Contractor A given their level of vulnerability and frailty.

48. NUISANCE VEHICLE (REMOVALS) CONTRACT

The Cabinet Member for Neighbourhoods introduced this report which sought approval, pursuant to Contract Standing Order (CSO) 9.07.1(d), for the award to Supplier A of a nuisance vehicle contract for a period of four years with optional extensions for a total contract value of £8.73m over a maximum contract term of 8 years including all extensions.

The Cabinet Member highlighted that Local Authorities had a statutory duty to remove Abandoned Vehicles from the public highway and any other land in the open air, such as car parks. To do this the Council needed to have a mechanism of removing vehicles and have a place to hold those vehicles to be claimed by their owners.

The Cabinet Member noted that in September 2015, Cabinet approved a 3-year contract with a 2-year extension to NSL. That contract would draw to an end in November 2019. The Council had explored if it could provide this service differently. However, the Council's assessment concluded that it was not financially viable for it to have a different delivery model, either in house or as a hybrid model with a contractor.

Whilst there was a desire to deliver services in-house, the Cabinet Member emphasised that the cost to do so for this particular product was not financially viable and therefore it was necessary to outsource this contract.

In response to questions from Councillor Rice, the following information was provided:

- The Cabinet Member would raise with IT that the Haringey App used to report dumped items did not have the option to report dumped vehicles and seek to rectify this.

RESOLVED

To approve, pursuant to CSO 9.07.1(d) the award to Supplier A of a nuisance vehicle contract for four (4) years with options to extend for an additional period of two (2) years plus two further periods of one (1) year, exercisable at the sole discretion of the Council, at a cost of £1.1m per annum or a total cost of £8.73m if all extension options are taken up. Details of Supplier A is outlined in Part B (exempt information) of the report.

Reasons for decision

The existing nuisance vehicle contract was awarded by Cabinet to NSL on 25th September 2014 for an initial period of three years with an option to extend for a further two years.

The existing contract was extended in November 2017 and will expire at the end of November 2019.

A new contract is required in order to support the wider transformation of the Parking service, which includes the roll out of further Controlled Parking Zones. The proposed contract includes a re-written specification and a requirement for the successful provider to deploy more removal vehicles and operate the vehicle pound for longer hours. The significant changes to the specification can be summarised as follows:

- An extra removal truck deployed throughout the day.
- Longer opening hours at the pound: 7am to 10pm Mon-Sat (but to midnight including on Sundays for event day operations) and Sundays 8am to 8pm.
- Additional vehicle storage capacity at the pound (150 vehicles) to cater for the increased expected volumes of removals.
- Quicker response times achieved through the new parking IT system.
- Provision for a 4th truck to be dedicated to events taking place at the Tottenham Hotspur Stadium.

Alternative options considered

Stop the Nuisance Vehicle Removal Service altogether

If the Council does not have a nuisance vehicle service in place upon expiry of the existing contract, the Council:

1. Could not meet its statutory duties in relation to abandoned vehicles and to keep traffic moving safely.
2. Could not remove the very high number of unregistered vehicles that are identified as part of its normal on-street parking enforcement. These vehicles often have high numbers of outstanding PCNs attributable to them.
3. Could not effectively deal with persistent evader vehicles and would lose the opportunity to recover the associated outstanding debt (more information is provided in section 6 of this report).
4. Could not meet its commitments under the Local Area Management Plan (LAMP), to provide a removals service on Tottenham Hotspur event days.

This was not deemed an acceptable option.

Operate an in-house removals service

This option was and will always be entirely contingent on the Council finding a suitable pound site. After an extensive search and with the co-operation of other services e.g. Homes for Haringey it was not possible to find a suitable site either in the borough or close to the borough boundary with Enfield. The only suitable site is already being used by the Council's incumbent provider NSL, as a shared pound with Islington and Waltham Forest.

Without a pound site, this was not deemed a realistic or feasible option.

Hybrid model

Under this option, which is an alternative to a fully outsourced service model, the contractor provides the pound, frontline staff and equipment. The Council provides supervisory staff to control and to run the operation. As part of the tender for this contract, the Council received one bid which included pricing for the hybrid option. Whilst the supplier's costs would remain the same overall under both models, under the hybrid model the Council would have to provide sufficient supervisory and management resources to run the operation. It would not be possible to generate additional revenue to cover the additional costs associated with the hybrid model (the Council cannot set targets or incentivise a supplier to carry out more removals in order to generate revenue). Whilst the Council's invitation to tender documents contained indicative numbers, these cannot be guaranteed and the actual number of removals will always remain variable from day to day.

This was not deemed a feasible option on grounds of cost.

49. INTRODUCTION OF RISK BASED VERIFICATION IN THE BENEFITS SERVICE

The Cabinet Member for Corporate and Civic Services introduced this report, which sought approval for Haringey's Risk Based Verification Policy as the means by which the Council processes claims for Housing Benefit and Council Tax Reduction.

The Cabinet Member noted the FOBO programme was initiated in September 2018 to modernise the Council's services, reduce the number of unnecessary contacts and simplify the experience for residents and businesses when using our services. Introducing Risk Based Verification (RBV) into the Benefits service would allow the Council to deliver on all the programme's objectives.

The Cabinet Member highlighted that RBV would mean that over 30% of our residents in receipt of Housing Benefit would need to provide less evidence to support their claim than they are currently required to do. This would result in the process to claim Benefits being significantly quicker and easier for them. For Council staff, it would mean sending significantly fewer requests for further information before a claim can be assessed. This would allow staff to spend more time making assessments and checking more high-risk cases rather than asking all our customers for more information.

The Cabinet Member noted the intelligence-based software used to apply RBV meant that only those claims, which were more likely to result in fraud, or error would be subject to the additional checks, which were currently applied to everyone. The result was a better service and experience for our customers and an improvement in our fraud and error detection rates. The RBV software was already being used successfully in 65 other local authorities and introducing it in Haringey would help bring our service in line with the service provided at other local authorities.

In response to questions from Cllr Bull and Cllr Connor, the following information was provided:

- It was too soon to forecast whether new applications and changes to circumstances would be processed in a quicker timescale, the service would be measuring impact on a monthly basis. Although, as risk approach was being taken forward for the verification of documents, those deemed less risk were expected to progress through the system at a faster pace. The impact would be neutral or improved depending on whether a claim was low or high risk. Corporate Committee also had considered this issue and scrutinised the details.
- It was noted that the EQIA cannot indicate the particular demographic and protected characteristic group which will be impacted as this decision as claims were on an individual basis. However, part of the service monitoring would be on a month by month basis and this will allow groups which are at high or low risk.
- It was noted that the DWP set the parameters for the software, an example of low risk will be someone on a pass-ported benefit. At the moment the Council would still ask for proof of benefit. However, going forward the Council would not need to ask for this, as DWP will give this a low risk score.

Further to considering the exempt information,

RESOLVED

To approve Haringey's Risk Based Verification Policy - Appendix A [exempt] as the means by which the Council will process claims for Housing Benefit and Council Tax Reduction having regard to the Equalities Screening Tool (set out in Appendix B)

Reasons for decision

To help reduce fraud and error in the processing of Benefit claims by targeting our resources to those claims which provide a higher risk of fraud and error. The software company has confirmed that those claims that carry the very highest risk rating in the high-risk group have a 40% chance of error.

A case study in Bolton found that since the introduction of RBV, error detection rates had increased by 13.4%.

Reduce processing times for customers whose claims are at low risk of fraud and error. The software company has confirmed that low risk category claims see improvements in processing times up to an average of 10 days per claim

A case study in Bolton found that since the introduction of RBV processing times for all claims reduced from 24.8 days to 17 days, and for low risk claims, it reduced to 5.4 days.

Alternative options considered

Do Nothing

Without targeting our resources to those claims, which pose a higher risk, we will not be making the most of our limited resources and are potentially delaying payments for customers with low risk claims. Our average processing times for 2018/19 was 18.14

days. We are also not in a position to identify and focus on those claims, which are highly likely to have an element of fraud or error.

50. SIGNIFICANT AND DELEGATED ACTIONS

RESOLVED

To note the significant and delegated actions taken in September.

51. URGENT BUSINESS

There were no items of urgent business.

52. EXCLUSION OF THE PRESS AND PUBLIC

RESOLVED

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

53. APPOINTMENT OF MASTERPLANNERS FOR THE SELBY AND BULL LANE PROJECT

As per item 40.

54. DELEGATED AUTHORITY FOR PROCUREMENT OF PROFESSIONAL ADVISORS FOR DEN PROGRAMME

As per item 41.

55. EXTENSION OF THE AUTUMN GARDENS & ANASTASIA LODGE CONTRACTS

As per item 42.

56. AWARD OF CONTRACT FOR THE PROVISION OF THE CUSTOMER PLATFORM

As per item 43.

57. AWARD OF CONTRACT FOR PROVISION OF SAP MANAGED SERVICE

As per item 44.

58. AWARD OF CONTRACT FOR THE HOMES FOR HARINGEY MAJOR WORKS YEAR 2 PROGRAMME, 3 LOTS

As per item 45 and the exempt minutes.

59. PROPOSAL FOR THE AWARD OF CONTRACT FOR THE DELIVERY OF A PUPIL REFERRAL UNIT PROVISION: SEPTEMBER 2019 TO AUGUST 2020

As per item 46.

60. SEEKING APPROVAL TO AWARD BLOCK CONTRACT FOR IN-BOROUGH NURSING PROVISION

As per item 47.

61. NUISANCE VEHICLE (REMOVALS) CONTRACT

As per item 48.

62. INTRODUCTION OF RISK BASED VERIFICATION IN THE BENEFITS SERVICE

As per item 49.

63. EXEMPT CABINET MINUTES

RESOLVED

To approve the exempt minutes for the meeting held on the 10th of September 2019.

64. NEW ITEMS OF EXEMPT URGENT BUSINESS

None

CHAIR: Councillor Joseph Ejiofor

Signed by Chair

Date

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Addendum to the Cabinet minutes 8th October 2019

4th November 2019

Decision item 44 Award of contract for provision of SAP managed service

Following consideration and approval of the SAP managed service at Cabinet on the 8th of October, it has been found that the cost of the Contract of £1,067,632 did not include the migration cost of £221,676.

To clarify, the finance comments of the report did include the £221,676.00 migration costs. This was set out in Section 8.1 and was also stated in Section 6 of the report considered by Cabinet. However, these costs were excluded from the overall contract cost in Section 3, the recommendations of the report. This means that when agreeing the recommendations, at the meeting on the 8th of October, the total contract cost of £1,067,632 was agreed instead of £1,289,308.

Therefore, Cabinet are asked to agree this clarification when agreeing the minutes of the 8th of October Cabinet meeting at the 12th of November meeting.

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Report for: Cabinet 12 November 2019

Title: Approval of additional Housing Revenue Account budget for new build properties and acquisitions of existing properties to house homeless households

Report authorised by: Dan Hawthorn, Director of Housing, Regeneration and Planning and Jon Warlow, Director of Finance

Lead Officers: Alan Benson, Interim Assistant Director for Housing
Kaycee Ikegwu, Head of Finance and Business Partnering

Ward(s) affected: All

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

1. Describe the issue under consideration

- 1.1. This report seeks approval to increase the capital programme by £70.4m in the Housing Revenue Account (HRA) in 2019/20, above and beyond the reprofiled budget approved in the Cabinet report of 10 September 2019.
- 1.2. The proposed increases totalling £12.8m for funding new homes building and new homes acquisitions are contained within the envelope of the 5-year HRA capital budget set out in the 10 September report and approved by Cabinet. There was insufficient funding identified in this financial year to cover the greater than expected scale of activities now being delivered in the Council housing delivery programme.
- 1.3. The report also proposes an addition to the HRA capital programme of £57.6m in respect of the acquisition of existing properties to be used as temporary accommodation for homeless households, a function previously included in the General Fund (GF) capital programme.
- 1.4. It is noted that this report does not, of itself, make any new spending commitments. All actual decisions to spend will be subject to the normal decision-making processes.

2. Cabinet Member Introduction

- 2.1. Increasing the Housing Revenue Account's (HRA) Capital Programme is an essential step in ensuring that the Council can deliver a key pledge from the current administration's manifesto and a central outcome of the Borough Plan: delivering 1000 new Council Homes. As well as this, the additional funding will allow the council to acquire properties to house homeless households – and re-

municipalise former Council homes lost under the right to buy over the past few years.

3. Recommendations

- 3.1. That Cabinet recommends Full Council approves additions to the 2019/20 HRA capital programme of £70.4m to finance: the construction of new build properties (£4.1m); the acquisition of new build properties for affordable housing (£8.7m) and the acquisition of existing properties to house homeless households (£57.6m).

4. Reasons for decision

- 4.1. On 10 September 2019, Cabinet approved a reprofiled HRA capital budget of £77.8m, for 2019/20. This included £62.8m for existing stock, £2.9m for the Council housing delivery programme and £12m for new homes acquisition. There is also a £41.4m in the General Fund capital budget to acquire existing properties to be used to house homeless households.
- 4.2. The construction of new build properties is now moving at a faster pace than anticipated in February 2019. The current budget provision of £2.9m for new build properties as outlined in the quarter 1 (period 3) budget monitoring report for 2019/20 to Cabinet dated 10 September 2019, has become insufficient to cover the cost of the accelerated works in this year.
- 4.3. Hence the need for an increase of £4.1m within the 2019/20 HRA budget for the construction of new build properties by the Council. This is following a re-assessment of the budget required given the faster speed and greater progress on these projects by the Council than projected in February 2019.
- 4.4. New opportunities have come forward to acquire properties under development by other organisations, that were not previously foreseen. Thus, the need for an increase of £8.7m within the 2019/20 HRA budget, for the acquisition of new homes.
- 4.5. In respect of the acquisition of existing properties to be used as temporary accommodation for homeless households, the Council recently received legal advice that acquisitions of such properties should be purchased within the HRA, rather than the General Fund. A decision is needed to regularise the current year's purchases and historic purchases. Further details are outlined in the report to Cabinet on 12 November 2019: 'Update on the Community Benefit Society'.
- 4.6. An additional capital provision of £57.6m within the 2019/20 HRA budget is required for the actioned, identified and potential purchase of existing properties, to be used to house homeless households. Further details are outlined in the report to Cabinet on 12 November 2019: 'Update on the Community Benefit Society'.
- 4.7. This report requests that Cabinet recommends Full Council approves a total sum of £70.4m of additional funding within the 2019/20 HRA budget to finance the activities detailed above and set out in more detail in section six.

5 Alternative options considered

- 5.1. Not allowing an increase in the programme of new build or acquisition of new build properties:** This option was rejected because there is a need to press ahead rapidly on the 1,000 council homes target and to deliver the interim target of 500 having planning permission and 350 having a start on site by May 2020.
- 5.2. Not allowing additional provision for the purchase of properties to be used to house homeless households:** This option was rejected because there is a need to ensure there is a supply of good quality, long term housing for homeless households.

6. Background information

- 6.1. In September 2019, Cabinet approved a reprofiled HRA capital budget of £77.8m, for 2019/20. This included £62.8m for existing stock, £2.9m for the Council housing delivery programme and £12.0m for new homes acquisition. There is also a £41.4m in the General Fund capital budget to acquire existing properties to be used to house homeless households.
- 6.2. The proposed increases totalling £12.8m for funding new homes building and new homes acquisitions are contained within the envelope of the 5-year HRA capital budget set out in the September 10 report and approved by Cabinet. There was insufficient funding identified in this financial year to cover the greater than expected scale of activities now being delivered in the Council housing delivery programme.
- 6.3. The construction of new build properties is now moving at a faster pace than anticipated in February 2019. The aim is to start 350 new build properties by May 2020, with 500 having planning permission. The current budget provision of £2.9m for new build properties was outlined in the quarter 1 (period 3) budget monitoring report for 2019/20 to Cabinet dated 10 September 2019. An additional amount of £4.1m is now required, making the total budget for 2019/20 £7.0m.
- 6.4. The acquisition of new homes being developed by other organisations for the purposes of Council housing has also progressed faster than expected because new opportunities have come forward to acquire properties that were not previously foreseen. The current provision of £12.0m for the acquisition of new homes was outlined in the quarter 1 (period 3) budget report for 2019/20 to Cabinet dated 10 September 2019. An additional amount of £8.7m is required for the schemes, making the total budget for 2019/20 £20.7m.
- 6.5. A further £57.6m is required within the HRA for the purchase of properties to be used to house homeless households. This is following recently received legal advice that such properties should be purchased within the HRA, rather than in the General Fund. Further details are outlined in the report to Cabinet on 12 November 2019: 'Update on the Community Benefit Society'.

- 6.6 There are 57 ex-Council properties acquired prior to 2019/20, at a total sum of c.£13m. Following the legal advice that these acquisitions should be held within the HRA, there will now be accounting adjustments between the General Fund and HRA to reflect the transfers between the two funds.
- 6.7. It is noted that if the recommendations in this report are agreed by Cabinet, it will need to be referred to the next meeting of Full Council on 26 November 2019 to make the necessary amendments to the Council's budget.
- 6.8. Subsequently, a further report will be presented to Cabinet in February 2020, setting out the HRA Business Plan, with all these capital work strands, including maintenance of existing stock, for the next ten years. This will request authorisation to spend from the HRA in the years from 2020-21 onwards.

7. Contribution to strategic outcomes

- 7.1 The recommendations in this report will support the delivery of the Housing Priority in Haringey's Borough Plan 2019/2023, which sets out in its first outcome that: *"We will work together to deliver the new homes Haringey needs, especially new affordable homes"*. Within this outcome, the Borough Plan sets the aim to: *"Ensure that new developments provide affordable homes with the right mix of tenures to meet the wide range of needs across the borough, prioritising new social rented homes"*.
- 7.2 In particular, the recommendations in this report are explicitly about delivering the aim: *"to deliver 1,000 new council homes at council rents by 2022"*. The proposals in this report contribute directly to the strategic outcomes on new housing supply that are at the core of the aims of the Council as expressed in the Borough Plan.
- 7.3 This report also supports the objective contained in the Borough Plan 2019/2023 to: *"work together to prevent people from becoming homeless, and to reduce existing homelessness"* and to: *"improve the experience of homeless families and minimise costs by reducing the Council's reliance on providers of nightly paid emergency accommodation"* where temporary accommodation cannot be avoided.

8. Statutory Officers comments

Finance

- 8.1. This report requests that Cabinet recommends Full Council approves an additional HRA capital budget of £70.4m to fund the various activities highlighted in sections 4.2 to 4.6.

New Homes Build & Acquisitions

- 8.2. Some of the schemes in these programmes are being accelerated. Therefore, a combined £12.8m additional budget is required in this year.

- 8.3. This represents a reprofiling of provisions from 2020/21. This will increase the revenue cost of borrowing in the current year (additional borrowing cost of £0.12m up to year-end). However, this will be offset by lower cost of borrowing in future years as the capital requirement will be less.
- 8.4. This minor change in revenue cost of capital to the HRA will be offset by corresponding small reduction in the budgeted HRA revenue contribution to capital, currently at £16m in 2019/20. This will result in a minor increase in the level of HRA borrowing required.
- 8.5. This increased capital programme provision, when drawn down this year, will not affect the viability of the overall Housing Revenue Account.

Acquisition for Temporary Accommodation

- 8.6. The £57.6m represents the provision required to cover the cost of properties already acquired in the General Fund in the year, acquisitions in legal conveyancing and potential future acquisitions up to March 2020.
- 8.7. This will be funded partly by borrowing and partly through using Retained Right to Buy receipts (RTB).
- 8.8. Borrowing of £40.3m and retained Right to Buy receipts of £17.3m are required. The projected retained RTB receipts at year end is adequate to cover the £17.3m.
- 8.9. The borrowing of £40.3m will attract an estimated cost of capital of £0.11m in this financial year.
- 8.10. There is adequate rental income to cover the cost of capital and running cost in the period they will remain in the HRA.
- 8.11. The consequent deletion of TA acquisition budget (£41.4m) from the GF capital programme will be proposed as part of the quarter 2 capital programme update to cabinet on December 10 2019.
- 8.12. The HRA financial plan update will substantively address the changes required to subsequent years HRA capital programme. There will be no consequent increases in rent and service charges levels in 2019/20.

- 8.13. Table 1: Proposed HRA capital budget position

Reprofiled 5 Year Budget, including TA acquisition (£57.6m)								
	Revised Budget September 2019-20 £'000	November Budget Adjustment 2019-20 £'000	Revised budget after adjustment 2019-20 £'000	2020-21 £'000	2021-22 £'000	2022-23 £'000	2023-24 £'000	Total £'000
Capital Investment								
Existing Stock Investment (Haringey Standard)	62,812	0	62,812	63,215	57,663	58,816	59,992	302,498
New Homes Build Programme	2,940	4,062	7,002	12,507	180,590	27,714	26,036	253,849
New Homes Acquisitions	12,006	8,725	20,731	30,748	126,962	149,784	104,812	433,037
Existing Homes Acquisition	0	57,600	57,600	0	0	0	0	57,600
Total Capital Investment	77,758	70,387	148,145	106,470	365,215	236,314	190,840	1,046,984

Procurement

- 8.14. As this is a funding application there are no procurement implications at this stage. However, Strategic Procurement will ensure that all procurement activity will provide value for money and be delivered in a compliance with all the required legislation.

Legal

- 8.15. The Council operates a leader and cabinet executive as provided by LGA 2000. The Local Authorities (Functions and Responsibilities) (England) Regulations 2000 require that it is for full Council, not the Cabinet, to make certain decisions. The terminology commonly used to reflect the statutory framework is that the authority's "budget and policy framework" are to be set by full Council..
- 8.16. Regulation 5 of the 2000 Regulations deals with the situation where the Cabinet is minded to determine a matter contrary to, or not wholly in accordance with, (i) the authority's budget, or (ii) the plan or strategy for the time being approved or adopted by the authority in relation to their borrowing or capital expenditure. In this situation the decision is for full Council, unless the local authority's constitution authorises the Cabinet to take the decision. The proposed increase in the HRA capital programme will be a departure from the Council's budget and will therefore need to be authorised by full Council.

Equality

- 8.17. 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.

- 8.18. The three parts of the duty apply 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.
- 8.19. The proposal is to make £ 70.4m additional capital funding available in the Housing Revenue Account (HRA) in 2019/20, beyond that made available in the February 2019 budget report. The purpose of this additional allocation is to finance the construction and acquisition of new build properties and the acquisition of existing properties to house homeless households.
- 8.20. Those most likely to be affected by the decision include households that are vulnerable to and/or experiencing homelessness. Data held by the Council suggests that women, young people, BAME communities, those who identify as LGBT+ and individuals with disabilities are particularly vulnerable to homelessness, as detailed in the Equalities Impact Assessment of the Council's Homelessness Strategy, accessible at [this link](#). As such, it is reasonable to anticipate a positive impact on residents with these protected characteristics.

9. Use of Appendices

10. Local Government (Access to Information) Act 1985

- a. [Cabinet report Q1 budget monitoring 10 September 2019](#)
- b. [Cabinet report budget 12 February 2019](#)
- c. [Full Council 25 February 2019](#)

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Report for: Cabinet 12 November 2019

Title: Update on the Haringey Community Benefit Society

Report authorised by: Dan Hawthorn, Director of Housing, Regeneration and Planning

Lead Officer: Alan Benson, Interim Assistant Director Housing

Ward(s) affected: All

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

1. Describe the issue under consideration

- 1.1 On 17 July 2018, Cabinet approved the creation of the Haringey Community Benefit Society (CBS) to provide housing to homeless households nominated to it by the Council.
- 1.2 The report also approved the CBS structure and governance arrangements and agreed a budget for the Council to purchase properties using the General Fund and lease them to the CBS for ten years.
- 1.3 Through the CBS, the Council will be able to purchase more local and better-quality homes and pay for these through the income generated by leasing them to the CBS. The CBS in turn will meet these costs by charging rents at the Government set Local Housing Allowance rate to households. At the end of the lease, these properties will return to the Council and it is anticipated that most of these homes will then be let as Council tenancies.
- 1.4 This report provides an update on progress on the CBS and notes the amendment to its funding arrangements from being a General Fund supported activity to a Housing Revenue Account supported activity. In addition, the report proposes a change to the agreed leasing arrangements so that properties are leased to CBS for periods of up to seven years instead of up to ten years.

2. Cabinet Member Introduction

- 2.1 This administration was elected on a manifesto that made it clear that we would act decisively to reduce homelessness and take action to improve the too often poor quality and precarious temporary accommodation in which nearly 3,000 homeless households in Haringey live. We argued: *"Poor housing has knock-on effects everywhere; from education to health to crime. And the regular churn of families and children moving from one temporary tenancy to another makes it difficult to build strong local communities."* We promised that we would do housing differently.
- 2.2 In July 2018, Cabinet approved the establishment of the Haringey Community Benefit Society, with its sole aim being to improve the housing available to

Haringey's homeless households. Many of these households often end up in private rented accommodation, which is expensive, insecure and often not of the quality we would like. Much is a long way away from Haringey. The recommendations in this report are the final steps in putting in place the CBS, which will help us ensure homeless families can have a home which is better, more stable and with lower rents than that provided by the market. Meanwhile the Council will make substantial savings in its annual temporary accommodation budget and, ultimately, re-municipalise stock that was lost under Right to Buy.

3. Recommendations

It is recommended that Cabinet:

- 3.1 Approves the new lease arrangements set out in paras 6.15 to 6.16, with each lease lasting up to seven years and comprising a portfolio of properties.
- 3.2 Notes that 52 residential units have already been acquired for transfer to the Community Benefit Society on its registration pursuant to the authority given on 17 July 2018 and:
 - 3.2.1. Agrees to the acquisition of a further 17 residential units up to the end of financial year 2019/2020: and
 - 3.2.2. Agrees to the acquisition of a further 65 residential units per year from financial year 2020/21; and
 - 3.2.3. Agrees that this authority replaces that given on 17 July 2018
- 3.3 Notes:
 - 3.3.1 That properties bought and leased to the CBS should be accounted for in the Housing Revenue Account, rather than the General Fund as set out at 8.15 below.
 - 3.3.2 That the detail of this change is set out in a report titled '*Approval of additional Housing Revenue Account budget for new build properties and acquisitions of existing properties to house homeless households*' to be presented to Cabinet on 12 November 2018.
- 3.4 Gives delegated authority to the Director of Housing, Regeneration and Planning, after consultation with the Assistant Director of Corporate Governance and Cabinet Member for Housing and Estate Renewal to make any changes that may be required by the Financial Conduct Authority to the Rules for the CBS so the CBS can be registered.

4. Reasons for decision

- 4.1 The decision being made is essential to the operation of the CBS.

- 4.2 The approval of seven-year leases and the “batching” of a number of properties into each lease will negate the need to seek approval for the leasing of each individual property from the Secretary of State. Seeking approvals in that way would inevitably significantly increase void times, delay the benefits to the households who would be offered the home and reduce the financial savings to the Council. The change to the purchasing of properties to be leased to the CBS being undertaken in the HRA rather than in the General Fund (proposed in a separate report and noted here) is necessary to comply with statute.
- 4.3 The Cabinet of July 2018 approved the acquisition of the first 100 homes with a further report to be presented to Cabinet for authority to acquire the additional 300 properties. With 52 homes already purchased for the CBS, and a further 17 expected before March 2020, it is anticipated that this target will be reached in the summer of 2020. To avoid a further report in the spring of 2020, or delays in continuing the programme, authority is sought as set out at 3.2.1-3.2.3
- 4.4 The July 2018 report set out expectations that the CBS would have two Council nominated Directors and that the Council would hold two of the CBS’s five shares. These rules were approved by the Director for Housing, Regeneration and Planning as delegated by the Cabinet and submitted to the FCA. However, the FCA had concerns about any shareholder having more than one share. These rules have thus been amended and resubmitted and the CBS is currently awaiting a response on whether these are acceptable to the FCA. A delegated authority is therefore required to deal with any further changes that the FCA may require before the CBS can be registered.

5. Alternative options considered

- 5.1 **To keep the lease at 10 years:** This option was rejected because leases of more than seven years on properties purchased through the HRA would require the specific consent of the Secretary of State. That process could be expected to take up to 6 months and may not result in an approval, which will add to void times and undermine the viability of the CBS model.
- 5.2 **To return to Cabinet to seek approval any purchased over the first 100 as set out in the July 2018 report:** This option was rejected because the sale process can take up to 6 months and with the limit expected to be reached in summer of 2020, this would require a second CBS report in early 2020.

6. Background information

Haringey Community Benefit Society (CBS)

- 6.1 Haringey currently has approximately 2,800 households in temporary accommodation. The high cost of this has led to a significant burden on the Council’s General Fund, whilst housing vulnerable families in homes that are sometimes out of the borough, and of lower quality than those that could be available through additional funding.

- 6.2 Because there is a limited supply of Council housing available, the Council has embarked on a programme to build new Council homes, starting with its target of 1,000 by 2022. However, this programme will take time to complete and will still not provide enough homes to be able to accommodate all the existing homeless households or those approaching the Council. The CBS will help to meet these shortfalls.
- 6.3 To date, the Council has purchased 57 homes of which 52 will, in due course, be leased to the CBS, with a further 17 properties expected to be purchased by the end of 2019/20. The purchase programme will then continue with a target of 65 additional homes to be purchased every year, replacing the previously reported initial programme of 100 properties. In addition, there will be the potential to acquire portfolios of properties, subject to the available budget and business cases.
- 6.4 The Council is likely to need to continue to use the private rented sector to house homeless households for many years. However, by setting up the CBS, the Council is creating an independent organisation that can reduce the reliance on the private rented sector and provide better quality and more cost-effective housing options for households referred to it by the Council. The tenancies provided through the CBS will be both affordable to those receiving Housing Benefit and provide longer-term security than their current or any available alternative arrangements.
- 6.5 As set out in section 1.9 of the Cabinet report on the CBS of July 2018, these properties will be used either to provide continued temporary accommodation or as an offer of a 'settled home', with the balance between these options decided at an operational level.
- 6.6 Where the 'settled home' option is selected, the Council will instruct the CBS to issue families with a two-year tenancy which will then become a periodic tenancy continuing until at least the end of the lease. Rents will initially be set at the Local Housing Allowance (LHA) so they should be affordable to those on Housing Benefit and will only increase when the LHA increases. This contrasts with conventional Private Sector offers which usually only provide tenancies at affordable rents for two years.

CBS governance and relationship with the Council

- 6.7 Although an independent organisation, the CBS has a close relationship with the Council as the sole source of both its properties and its tenants. The CBS's Rules are still to be approved by the Financial Conduct Authority but, as submitted, they give the Council the right to nominate two of its five Directors, who will be the Assistant Director of Housing (currently Alan Benson) and the Executive Director of Housing Demand at Homes for Haringey (currently Denise Gandy). They also permit the Council to withdraw these Directors as required and to nominate their replacements.
- 6.8 The Rules were originally submitted to the FCA with the CBS having five shareholders and the Council having two of these shares. However, the FCA had concerns about any shareholder having more than one share. As a result,

the Rules were revised and have been re-submitted for approval and registration with the CBS. There will now be four shareholders instead of five as set out in the July 2018 Cabinet Report, with the Council holding one of the four CBS shares. The remaining three shares are held by the independent Directors. The initial appointments to these roles are to be Mark Baigent (Chair of Tower Hamlets CBS and Capital Letters – the Pan-London Temporary Accommodation procurement organisation), Meera Bedi (a local resident and Head of Development at Barnet Homes) and Steve Beard (Director of Beacon Ltd who provided expert advice in the setting up of the CBS). A delegated authority is therefore required to deal with any further changes that the FCA may require before the CBS can be registered.

- 6.9 As delegated by the July 2018 report, the initial Independent Directors were nominated by the Director of Housing, Regeneration and Planning, in consultation with the Cabinet Member for Housing and Estate Renewal. It is intended that the initial three independent Directors will step down over 12-18 months from the establishment of the CBS to be replaced through an open recruitment process with future appointments made by the Directors remaining in office including the two Council appointees.

CBS rules and aims

- 6.10 The CBS's Objects are to: -

“undertake the ownership and letting of social housing and closely associated activities to households in housing need by reason of youth, age, ill-health, disability, financial or other disadvantage, solely for the benefit of households nominated by Haringey Council; and

Such other charitable object beneficial to the community consistent with the objectives above as the Board shall in its absolute discretion determine”.

- 6.11 These aims commit the CBS to use all of the properties to accommodate households nominated to it by Haringey Council. This commitment will be formalised in a Put Option and a Nominations Agreement.
- 6.12 In addition to the lease arrangements above, the CBS may also be able to secure other properties. However, the Nomination Agreement would require any such additional properties to be used solely to accommodate households nominated to it by the Council. The source of these additional properties could include, for example, taking over leases that had been with the Council under its Private Sector Leasing scheme (which would reduce the need for Council subsidy), or purchasing properties directly, using funding made available by the Council. The latter option would be subject to Cabinet approval.
- 6.13 As stated above, at the time of this report, the CBS is completing the registration process with the Financial Conduct Authority. This is necessary for it to become a legal entity and therefore be able to enter into contracts, take out insurance and set up its own bank account. Once this has been completed, the CBS Board will meet to approve the various documents needed to establish its relationship with the Council and Homes for Haringey. These documents

include the Put Option and Nomination Agreement and other key documents which have already been drawn up and completed.

- 6.14 The Put Option will oblige the CBS to take properties offered to it subject to meeting the agreed property standards. The properties will be leased in batches using the standard lease agreed. The lease sets out the rent and other terms and conditions. The Nominations Agreement will require the CBS to accept households nominated to all properties by the Council. The CBS will let each property under an Assured Shorthold tenancy. These documents will be approved by the Director of Housing, Regeneration and Planning, on approval of this report, as delegated in the July 2018 Cabinet report,

Changes from the July 2018 report

- 6.15 In the CBS report to Cabinet of 17 July 2018, the standard lease length was set at ten years. The Council is required to obtain Secretary of State's consent when disposing of properties held for housing purposes. Specific consent of the Secretary of State is required for leases longer than seven years. Because this could take up to six months it would add to void costs and the loss of a home for this period. The application process will also increase administration time and costs and this together with the uncertainty of approval will restrict the Council's ability to respond quickly to opportunities.
- 6.16 It is therefore proposed that the standard lease length be changed to a maximum of seven-year as this would allow the Council to rely on the General Housing Consent issued by the Secretary of State. Each lease will be granted for a portfolio of properties in accordance with the General Housing Consent although the Council can only grant five leases per financial year.
- 6.17 A separate report 'Approval of additional Housing Revenue Account budget for new build properties and acquisitions of existing properties to house homeless households' is also being presented to Cabinet on 12 November 2019. This explains that properties purchased for the purpose of leasing to the CBS should properly be accounted for through the Housing Revenue Account, not the General Fund as envisaged in July 2018.
- 6.18 The Cabinet of 17 July 2018 approved the first 100 purchases to be used for the CBS with a further report to approve additional homes. With the progress in purchasing properties, and the anticipated completion of a further 17 units before March 2020, it is likely that this limit will be reached in the summer of 2020 which would require a further CBS report in early 2020 to avoid the programme being suspended while awaiting approval to continue. It is therefore proposed that Cabinet agree to extend the programme at this stage as set out in recommendations 3.2.1-3.2.3

Options at the end of the seven-year lease

- 6.19 The General Consent provides that on expiry of a seven-year lease, no further lease of that property can be granted within a year of termination of that lease without specific Secretary of State permission. This means that at the end of each lease, the Council will need to decide on the future of the properties within

the portfolio. This will have an impact on both the Council's finances and the households living there.

- 6.20 The expected option is for the properties to be re-let as Council tenancies if this is financially viable. This is expected to be the case for most, if not all, of the initial properties already purchased. However, with the creation of the CBS and the additional income generated, the Council's future purchases may include more expensive (and better quality) properties. These properties may not always be financially viable at social rents and so other options may need to be considered. These could include selling the property at full market value either to the Arms' Length Management Organisation or to the Council's Wholly Owned Company (WOC) when this is established.

7. Contribution to strategic outcomes

- 7.1 The CBS will support the delivery of the second of the three outcomes for the Housing Priority in the Borough Plan, namely that *"We will work together to prevent people from becoming homeless, and to reduce existing homelessness"*. It will deliver the objective that *"where temporary accommodation can't be avoided, improve the experience of homeless families and minimise costs by reducing the Council's reliance on providers of nightly paid emergency accommodation"*.
- 7.2 Creating the CBS will also assist in the delivery of the Council's statutory Homelessness Strategy 2018 by improving the suitability, affordability and location of both temporary accommodation and private tenancies.

8. Statutory Officers comments

Finance

- 8.1 The report is making a recommendation to change the length of the lease that can be granted to the CBS from 10 years to seven.
- 8.2 The report is also informing Members of the change to the accounting arrangements that are required, so the houses purchased are accounted for in the Housing Revenue Account (HRA) rather than the general fund as previously budgeted.
- 8.3 The current general fund Temporary Accommodation Acquisition Programme budget of £41.442m is composed of an original budget of £25.0m to which was added £14.027m as part of the agreed brought forwards by Cabinet in June 2019. In addition, Cabinet agreed at its meeting of the 10th September 2019 to vire £2.416m from the TA Property Acquisitions Scheme budget to the Temporary Accommodation Acquisition Programme budget. The use of the CBS to house homeless people will generate savings in the General Fund.
- 8.4 The General Fund capital programme will need to be varied downwards by £41.442m to reflect the fact that the properties being acquired for lease to the CBS will now be funded through the HRA. The revision to the General Fund

budget will not impact either adversely or positively on the General Fund revenue budget as the Temporary Accommodation Acquisition Programme budget was included in the General Fund approved capital programme on the basis that it was self-financing. In addition, expenditure to date of £6.886m will need to be transferred from the General Fund to the HRA.

- 8.5 Once transferred into the HRA the net effect of these properties is beneficial in that on average they make a positive contribution of c£2,200 per unit during the period of the lease to the CBS. This is because the lease rental being charged to the CBS is greater than the costs incurred by the HRA in financing the cost of acquisition.
- 8.6 Using the CBS to house homeless people will generate around £0.146m per annum savings to the General Fund Temporary Accommodation budget in year 1, then a further £0.146m in year 2 and building through to year 7, on the basis of around 65 property acquisitions per annum.
- 8.7 At the end of the lease period the properties will come back to the Council for its use. Prior to the expiry of the lease there will need to be a timely review of the options open to the Council to ensure that the houses returned to the Council will be used in a financially efficient manner.

Procurement

- 8.8 Strategic Procurement note the recommendations within section 2 of this report. However, comments are not required for this report.

Legal

- 8.9 The Assistant Director of Corporate Governance has been consulted in the drafting of this report.
- 8.10 The Council has duties to secure accommodation both for applicants during the application process ("interim accommodation") and for those applicants to whom it accepts a full duty ("temporary accommodation"). It can, by procuring the making of a suitable offer of accommodation from the private sector, end (or "discharge") that duty.
- 8.11 The effect of the Welfare Reform and Work Act 2016 (to 31 March 2020) and the Rent Standard set by the Regulator of Social Housing (subsequently), is that the Council is limited, in the rent it can charge for property it lets directly, to social rents. That limit does not apply to rents charged by the CBS, which is not controlled by the Council.
- 8.12 Before disposing of housing land s32 of the Housing Act 1985 requires the Council to have the consent of the Secretary of State. The Secretary of State has issued the General Housing Consents 2013 setting out circumstances in which consent is given without specific application; any disposal outside the terms of that Consent requires specific consent from the secretary of State.
- 8.13 The General Housing Consent permits the Council to grant up to 5 leases of its housing land for up to seven years to bodies in which it has an interest; which

description includes the CBS by virtue of the Council's ownership of a share in it. Each such lease can include a portfolio – a batch - of properties.

- 8.14 A further paragraph of the General Housing Consents permits disposals at full market value (albeit this is also subject to a restriction of 5 disposals a year where the Council has an interest in the body to which the disposal is made), making this an option after expiry of the seven year leases.
- 8.15 By statute, the Council must account for its housing land through its HRA unless an exception applies; no such exception applies to the properties intended to be acquired and leased to the CBS. Further legal comments appear above in the body of the report.
- 8.16 The CBS is at present being registered with the FCA and once registered the CBS will be able to operate as a legal entity. As set out in this report it will enter into a suite of documents which will control the relationship between the Council and the CBS. These documents are:
- 1 Put Option: This is an agreement for lease which allows the Council to put forward residential properties (as and when they become available) that meet the required standard and obliges the CBS to lease them from the Council for a term of up to 7 years. The lease contains provisions dealing with rent, rent review and repairs and provides for the CBS to give up the properties with vacant possession at the end of the term.
 - 2 Nomination Agreement: This agreement allows the Council to nominate tenants for the properties leased to the CBS under the Option Agreement for either temporary accommodation or settled accommodation. The CBS must grant each tenant an Assured Shorthold Tenancy based on a standard agreement at a rent equivalent to the LHA rate. The length of each AST will be agreed between the Council and the CBS but cannot exceed the lease term of 7 years in any event.
- 8.17 The properties will be managed by Homes for Haringey under a separate management agreement between Homes for Haringey and the CBS.

Equality

- 8.18 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.

- 8.19 The three parts of the duty apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status apply to the first part of the duty.
- 8.20 Approval of these formal agreements will allow the CBS to provide better quality accommodation for homeless applicants and to ensure a regular supply of high quality, well-managed, sub-market homes. The decision will therefore primarily affect individuals and households living in temporary accommodation and those who are most at risk of homelessness. A full Equalities Impact Assessment on the CBS was attached as an Appendix to the original Cabinet report. There are no expected negative impacts of the proposals in this report.

9. Use of Appendices

None

10. Local Government (Access to Information) Act 1985

Cabinet report “*Setting up a Community Benefit Society and a Purchase, Repair and Management Partnership to deliver Temporary Accommodation solutions*”.

<http://www.minutes.haringey.gov.uk/documents/g8824/Public%20reports%20pack%2017th-Jul-2018%2018.30%20Cabinet.pdf?T=10>

Minutes of Cabinet meeting of 17 July 2018 approving the creation of the CBS

<http://www.minutes.haringey.gov.uk/documents/g8824/Printed%20minutes%2017th-Jul-2018%2018.30%20Cabinet.pdf?T=1>

Report for: Cabinet, 8th October 2019

Title: Award of Contract for the provision of SEND Transport Transformation Consultancy Services

Report authorised by: Ann Graham Director, Children's Services

Lead Officer: Peter Featherstone, 020 8489 4214,
peter.featherstone@haringey.gov.uk

Ward(s) affected: All

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

1. Describe the issue under consideration

1.1. At the Cabinet meeting of 9th July 2019, it was resolved:

- to approve the revenue budget variations associated with the Children's Services Invest to Save Programme....; and
- to delegate to the Director of Children's Services in consultation with the Cabinet Member for Children & Families future decisions on the invest to Save Programme (except for SEND Transport) subject to the outcomes of any necessary Equalities Impact Assessment and consultation and any other relevant consideration

1.2. The report presented to the July Cabinet detailed the proposal to commission external change management capacity to deliver the recommendations from a comprehensive review of Haringey SEND transport, which would be procured through a restricted tender route and that the outcome would be subsequently presented to Cabinet for approval.

1.3. The SEND Transport review identified a number of service delivery improvement measures that are expected to secure improved value for money for Haringey, and introducing new systems to extend and build on the high level of service currently offered to our children and young people with special educational needs and disability, and their families.

1.4. A revenue budget variation was agreed by Cabinet of £780,000 to deliver the two-year change management programme and service transformation.

1.5. This October 2019 report details the outcome of that tendering process and makes a recommendation to award the tender to a provider with the requisite capability and expertise to develop a new and high performing travel operation for Haringey which is fit for purpose to meet current and future demand.

2. Cabinet Member Introduction

- 2.1 This report sets out a proactive and positive plan to improve our SEND transport service. A review of the service has led to the need to take this radical step without delay.
- 2.2 With the service currently costing approximately £4.8m per annum, this is a vital service for families with children who have a range of special educational needs and disabilities. It is essential that this vital operational service is efficient, effective, able to adapt and to accommodate a variety of individual needs. This is an in-house service where the management and administration of SEND transport is run directly by the local authority. In addition, the escorts and travel buddies- some 110 staff – are all directly employed by the Council. The transport itself is provided by a range of contractors.
- 2.3 The proposed transformation has two phases. The first phase is to award a contract for an external transformation business partner who has extensive experience working with other authorities to improve their SEND transport arrangements. This first phase will have a specific requirement for a team who will work alongside our in-house officers to implement much needed changes and savings which are set out in detail in the report below.
- 2.4 This work will involve detailed review of how the service is organised and administered to ensure our in-house service meets needs of children and families, and is cost-effective. Once complete, the second phase will be to review the current arrangements for provision of vehicles with a view to insourcing.
- 2.5 This external review will involve parents and carers alongside officers. This is central to delivering the cultural change within the team in relation to service planning and delivery for the longer-term development and sustainability of this essential in- house service.
- 2.6 Payment of this contract is contingent on the savings being made.

3. Recommendations

- 3.1. This report recommends that Cabinet:
 1. Approves the award of a contract for the provision of SEND Transport Transformation Consultancy Services to the successful tenderer in accordance with the Council's Contract Standing Order (CSO) 9.07.1(d), for a period of two (2) years commencing end of October 2019 and at a total value of up to £600,000 over the 2 years period, with a further gainshare reward dependent upon demonstrable value of savings delivered in excess of £635,000 per annum;
 2. that the date of commencement of the contract will follow immediately after five working days of the publication of the Cabinet decision to

approve, plus a further ten working days standstill period as per public procurement contract regulations; and

3. that exploration of a further phase (phase 2) of transformation to insource vehicles and drivers is considered once the transformation of the SEND transport service and the associated savings is secured.
- 3.2. Notes the details of the successful tenderer is outlined in Part B (exempt information) of the report.

4. Reasons for decision

- 4.1. A scoping review of SEND Transport provision was undertaken during April and May 2019 that reported opportunities to improve service, customer focus and confidence, resilience and provide a real and evidenced opportunity to deliver net savings of at least £600,000 per year. The review also found that:
- 4.1.1. Expectations from parents and schools are (rightly) high and that they wish for their services to be improved if they are to meet need.
 - 4.1.2. In meetings with Headteachers and parents there was strong feedback that suggested poor communication, poor responsiveness and lack of proper consultation on changes, other than big events, by Haringey's Transport team.
 - 4.1.3. An apparent lack of understanding across parents of the Council's obligations and policy in respect of transport.
- 4.2. Having considered the findings of the Scoping Review Report, in specific regard to the potential to improve services for families and to achieve significant sustainable savings, it was agreed to proceed with an Invitation to Tender exercise to identify a suitable external transformation partner.
- 4.3. This decision was reached after due consideration was given to the option of an in-house delivery model, where it was agreed that:
- A lack of SEND transport transformation/change management experience would impact adversely on the delivery of service improvements;
 - the necessary step change in cultural and operating practice would not be realised;
 - savings would only partially be realised;
 - the inability to flex the necessary additional SEND transport related experience during expected 'resource-heavy' periods would impact delivery and incur additional staffing costs; and that
 - an external SEND Transport transformation partner would strengthen the service offer to families and the in-house team.
- 4.4. In deciding to seek an experienced external transformation partner, and with due regard to feedback received from the Overview & Scrutiny Committee in July 2019 who requested that 'the voice of users should be at the heart of that

service and that it should be co-designed, where possible', it was further agreed that:

- The approach to change must consider and engage appropriately and robustly with both parents and schools and, where possible, with our children and young people;
 - the Assistant Director for Schools and Learning will ensure that during the early stages of the partnership with the transformation partner, parents, children and schools will be involved during the transformation process;
 - the changes must be sustainable, and robust demand management and innovative travel solutions be established to best deal with new and any increasing demand or need for travel;
 - to reduce the financial risk and to achieve best value for money for the Council and our residents, the preferred bidder must provide a guarantee of cost savings by being prepared to place contract fees at risk for non or partial delivery; and that
 - a monthly steering board made up of officers, parents and Members as appropriate, will review progress and provide assurance of 'signed off' savings against target. Savings will be signed off by the Council's financial team every month.
- 4.5. As well as the financial savings, this programme will be tasked to deliver a critical new and high performing travel operation for Haringey which is fit for purpose to meet current and future demand. The service will fit with a wider SEND strategy to improve services and make best use of resources.
- 4.6. In undertaking the restricted tender exercise to identify a suitably experienced external transformation partner to support the change process, prospective bidders needed to demonstrate:
- Evidence of very specific operational knowledge and transformation experience of SEND transport services; and
 - guarantee of projected savings, that are sustainable, by putting their consultancy fees at risk.
- 4.7. Subsequent to the tendering exercise, a bid has been received from a prospective supplier that promises a sustainable £635,000 per annum saving against a baseline 2018/19 expenditure of approximately £4,800,000 and that is guaranteed against provider delivery costs. This work would transform how the service is delivered and embed strong management and delivery.
- 4.8. The contract value is up to £600,000, subject to the full delivery of agreed savings (as set out in paragraph 8.1 below), with a further gainshare reward dependent upon value of savings delivered in excess of £635,000 per annum.
- 4.9. The contract value is £180,000 below the budget envelope approved by Cabinet in July 2019 of £780,000, representing a 23% saving on the budget envelope.

5. Outcome of Tender Process

5.1. In order to ensure compliance with EU procurement legislation and to ensure value for money, a mini-competition exercise in accordance with CSO 7.01(b) was conducted. The tender was conducted via the Crown Commercial Services (CCS) Management Consultancy Framework 2, lot 1, which contained 275 suppliers. A shortlisting exercise was carried out, based on the Council's minimum requirements for the service, which narrowed the suppliers down to 57. All 57 suppliers were contacted with an invitation to submit an Expression of Interest, of which 11 suppliers expressed interest in bidding for the service. The Competition was in accordance with the framework conditions, which was based on an evaluation weighting of:

- Price 40%
- Quality 60%

5.2. Following the receipt of 11 Expressions of Interest, a single bid was received that has been independently evaluated by three Council officers in accordance with the pre-determined evaluation criteria and subsequently moderated with procurement colleagues. The bid passed the minimum requirements and scored a total of 45% from the available 60% for quality.

6. Assessment of bidder response to the Service Specification

6.1. A low number of bids was expected because SEND Transport is a highly specialised service and a prerequisite for any bid to be considered was that the supplier would be able to demonstrate a deep and clear understanding of the service, the depth of the transformation needed and be able to show a proven track record in having delivered the transformation, including stipulated savings, in other local authorities. The examples of this to support the supplier we are recommended as part of this report can be found at Part B of this report.

7. Alternative options considered

7.1. Appendix A details options that were appraised by the Children's Services Directorate, together with the respective advantages and disadvantages of each option.

7.2. The recommendation arising from the option appraisal is to:

- Procure a specialist external transformation partner through a competitive restricted tender to support the change process, with:
- sustainable savings guaranteed against consultancy charges; and
- a gainshare agreement regarding additional sustainable savings that may be realised above contractual agreement.

7.3. Once transformation is underway and improvements begin to be secured and embedded, officers will begin a 'Phase 2' of the process which will give full consideration as to if and how vehicles might be procured and drivers employed by the Local Authority to further support the transformation process.

8. Potential for additional benefits realisation / future service development

Transformation of adult services transport provision

8.1. Implementing lessons learnt from a transformation of Children's Services SEND Transport provision could potentially reduce the travel costs to Adult Services, improve outcomes and increase mobility for adult service users – including, for example:

- Improved provision of travel training to increase levels of independent travel which would reduce the spend in adults as those young people move from Children's into Adults Services;
- best practice in terms of escorts to ensure safer and less stressful journeys;
- improved purchasing systems for travel framework and providers which can be used across services; and
- improved vehicle tracking for adult service users including reducing time spent travelling and increasing time spent in funded provisions such as day opportunities.

8.2. Specific examples of how the supplier has supported transformation of adult services transport provision can be found at Part B of this report.

Insourcing of vehicles and drivers

8.3. In the past, the Council has provided a portion of its own vehicles. However, with such 'insourcing' of vehicles comes considerations that include:

- Purchase/lease cost;
- upkeep and maintenance;
- garaging/parking facilities overnight, at weekend and across holiday periods;
- vehicle insurance and tax;
- fluctuation in service demand (including during holiday periods); and
- employment and management of drivers.

8.4. A cost benefit analysis of insourcing some/all vehicles would need to be carried out to understand if insourcing on any scale is financially prudent and presents best value (in monetary and in service delivery terms), and it is recommended that such a phase should be picked up only at the point where we are satisfied that our management and delivery of the SEND Transport Service is able to operate at the very highest level.

8.5. Once the transformation process is well underway, we will be in a strong position to robustly consider if and how to insource either all or selected elements of the transport provision – for example, we could proceed with an initial consideration of insourcing wheelchair accessible vehicles to meet the needs of those families in the borough who require this service.

9. Conclusion

- 9.1 In conclusion, this report has set out the tender process carried out to secure a specialised consultant with the experience and proven outcomes to take the transformation of our SEND transport Service to a level where we are confident that it robustly meets the needs of all of our families. The recommended supplier has a proven, high performing track record across the country (see Part B of this report) in transforming such services and reducing costs by a significant sum.
- 9.2 The recommended provider will bring much needed, critical and immediate capacity to the service and the savings outlined across this report can be delivered very quickly. Most importantly, this transformation will be enabled via a proven methodology that the supplier brings to the table, together with extensive experience that doesn't currently exist in-house to transform the service and all of its processes to ones where service is unanimously fit for purpose and delivery is of the very highest quality. This is what our families deserve for the service.

10. Contribution to strategic outcomes

- 10.1. **Outcome 5:** Happy childhood: all children across the borough will be happy and healthy as they grow up, feeling safe and secure in their family, networks and communities.
- 10.2. **Outcome 6:** Every young person, whatever their background, has a pathway to success for the future.

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

11.1. Finance

- 11.1.1. This is one of the Children's Services Invest to Save programmes as described in the MTFS update report to Cabinet on 9th July 2019.
- 11.1.2. The proposal seeks to utilise the council's flexible capital receipts to improve efficiencies and reduce demand pressures within the Children's Services budget as agreed by Cabinet in February 2019.
- 11.1.3. The base cost of the contract is estimated at £600,000 over 2 years to deliver savings of £240,000 in year one, rising to £510,000 in year two, and to £635,000 in subsequent years.
- 11.1.4. There are further costs for software and other operating costs for the transport team that are included in the Invest to Save programme and not impacted by the consultancy fee.

11.1.5. The table below details the costs and anticipated savings over the contract period

Period	Consultancy Fee	Target Savings	Annual Net Savings	Other Non-Contract related costs	Net Saving after Non-contract costs
Year One	£240,000	£240,000	£0	£51,500	(£51,500)
Year Two	£360,000	£510,000	£150,000	£41,500	£108,500
Year Three	£0	£635,000	£635,000	£43,000	£592,000
Year Four	£0	£635,000	£635,000	£43,000	£592,000
Year Five	£0	£635,000	£635,000	£43,000	£592,000
Total	£600,000	£2,655,000	£2,055,000	£222,000	£1,833,000

11.1.6. The table below shows how these costs and savings are to be realised by financial year.

Period	Consultancy Fee	Target Savings	Annual Net Savings	Other Non-Contract related costs	Net Saving after Non-contract costs
2019/20	£60,000		(£60,000)		(£60,000)
2020/21	£270,000	£240,000	(£30,000)	£51,500	(£81,500)
2021/22	£270,000	£510,000	£240,000	£41,500	£198,500
2022/23	£0	£635,000	£635,000	£43,000	£592,000
2023/24	£0	£635,000	£635,000	£43,000	£592,000
2024/25	£0	£635,000	£635,000	£43,000	£592,000
Total	£600,000	£2,655,000	£2,055,000	£222,000	£1,833,000

11.1.7. The financial year 2019/20 has an MTFS target of £125,000. The contract is due to start November 2019 and it is estimated that the saving delivered by the contract to March 2020 will be approximately £100,000. The remainder of the MTFS saving will be delivered during the financial year 2020/21.

11.1.8. Should savings exceed the thresholds detailed above in the first two years, 40% of the additional saving in the respective years will be paid to the contractor, with the remaining balance being a benefit to the Council.

11.1.9. Full payment of contract fees will have been made by the Council at the end of Year Two, subject to the agreement between the Council and the provider that the practices in place at the end of Year Two are reasonably expected to deliver £635,000 savings in Year Three.

11.1.10. In regard to sustainability of savings:

- The provider will provide a full sustainability sign-off at the end of year 2 to ensure that: savings are sustainable; all plans are implemented; and the SEND Transport team has been developed in accordance with any plans agreed during the contract period.
- A quarterly audit through Year Three, at no additional cost to the Council, to support the Council to identify any possible item or management practice which has moved off track or has the potential to move off track that may impact savings delivery.
- In the event of any year three shortfall of savings, deemed to not be by fault of the Council, the provider will refund the value of the shortfall from paid fees and/or gainshare paid within years one and two.
- In the event of a shortfall in savings realised in Year Two, then a rebate will be due from the Provider to the Council. The rebate will be calculated based upon the percentage shortfall in savings delivery and applied directly to the overall cost of the transformation contract. That is to say, a 10% shortfall to the agreed savings target of £635,000 will incur a 10% rebate from the provider – in such instance, £60,000.
- In the event of a surplus in savings in Year Two, then a gainshare reward will be due from the Council to the Provider. The gainshare will be calculated based upon 40% of additional savings achieved in the contract period. That is to say, a surplus to the agreed savings target of £635,000 of £60,000 (that is to say, overall savings of £695,000) will result in a £24,000 reward payment to the provider.
- The upper limit of savings to which a gainshare award will be considered is set at £1,000,000, such that the maximum gainshare award that can be rewarded to the Provider is set at £146,000.

11.1.11. The contract period in regard to consideration of savings terminates at the end of Year Two. Savings after that point are out of scope for reward / rebate.

11.2. Procurement

- 11.2.1. CSO 9.07.1 (d) allows Cabinet to award a contract valued at £500,000 or more
- 11.2.2. CSO 7.01(b) allows for the Council to select a supplier from a Framework or similar arrangement.
- 11.2.3. CCS framework RM6008 Part 2 is a suitable framework that complies with CSO 7.01(b)
- 11.2.4. A further competition under the Framework rules was undertaken and a bid was received and evaluated.
- 11.2.5. The award of the contract to the winning bidder under the Framework is a compliant route to procure the contract.

11.3. Legal

- 11.3.1. The Assistant Director of Corporate Governance notes the content of the report.
- 11.3.2. Strategic Procurement has confirmed that the service was procured under the Crown Commercial Service (CCS) Management Consultancy Framework (RM6008) Part 2.
- 11.3.3. Pursuant to the Council's Contract Standing Order (CSO) 7.01(b) and Regulation 33 of the Public Contracts Regulations 2015, the Council may select one or more Contractors from a Framework established by a public body where the Council has been named as an approved user in the OJEU Contract Notice and it is confirmed that the Council is an approved user of the CCS Framework No. RM6008.
- 11.3.4. Pursuant to CSO 9.07.1(d), Cabinet may approve the award of a contract if the value of the contract is £500,000 or more and as such Cabinet has power to approve the award of the contract in this Report.
- 11.3.5. The Assistant Director of Corporate Governance sees no legal reasons preventing the approval of the recommendations in the report.

12. Appendices

- Appendix A – Options Appraisal
- Appendix B – Background Information
- Appendix C – Equality Impact Assessment
- Exempt appendix - Exempt from publication under paragraph 3 of Section 12 A of the 1972 Local Government Act

Appendix A – Options Appraisal

Option	Advantages	Disadvantages
Do nothing	No additional costs.	<p>Capacity issues identified in scoping report are not addressed.</p> <p>Services delivery inefficiencies and areas for improvement are not addressed.</p> <p>Parents and carers continue to report issues with SEND transport services.</p> <p>Savings are not realised.</p>
Deploy internal transformation / change management resource	<p>Transformation and change management costs to implement the recommendations of the scoping review are minimised.</p> <p>Potential to redeploy staff at risk of redundancy.</p>	<p>A lack of SEND transport transformation / change management experience impacts delivery of service improvements.</p> <p>Capacity issues identified in scoping report are not addressed.</p> <p>Services delivery inefficiencies and areas for improvement are not addressed.</p> <p>Parents and carers continue to report issues with SEND transport services.</p> <p>Step change in cultural and operating practice is not realised.</p> <p>Savings are only partially realised.</p>
Appoint additional staff member with SEND transport experience on either a permanent or fixed term basis to support service improvement	<p>Additional 'business as usual' service delivery costs are minimised.</p> <p>Service delivery capacity issues in SEND Transport are addressed, supporting the delivery of directly related service improvements.</p>	<p>A lack of SEND transport transformation / change management experience impacts delivery of service improvements.</p> <p>Inability to flex the necessary additional SEND transport related experience during expected 'resource-heavy' periods.</p>

Option	Advantages	Disadvantages
		<p>Step change in cultural and operating practice is not realised.</p> <p>Savings are only partially realised.</p>
<p>Appoint additional staff member with SEND transport experience on either a permanent or fixed term basis to support service improvement; and</p> <p>Deploy internal transformation / change management resource.</p>	<p>Additional 'business as usual' service delivery costs are minimised.</p> <p>Service delivery capacity issues in SEND Transport are addressed, supporting the delivery of directly related service improvements.</p> <p>Transformation and change management costs to implement the recommendations of the scoping review are minimised. Potential to redeploy staff at risk of redundancy.</p>	<p>A lack of SEND transport transformation / change management experience impacts delivery of service improvements.</p> <p>Inability to flex the necessary additional SEND transport related experience during expected 'resource-heavy' periods.</p> <p>Step change in cultural and operating practice is not realised.</p> <p>Savings are only partially realised.</p>
<p>Procure a specialist external transformation partner through a competitive restricted tender to support the change process, with:</p> <p>Sustainable savings guaranteed against consultancy charges; and</p> <p>Gainshare agreement regarding additional sustainable savings that may be realised above contractual agreement</p>	<p>A team approach from experience SEND Transport professionals, with an ability to economically flex capacity during expected 'resource-heavy' periods.</p> <p>Lessons learnt from SEND transport transformation at other local authorities maximise potential for benefits realisation</p> <p>Tender pre-requisite for sustainable savings to be guaranteed against consultancy charges minimises risk to the local authority.</p> <p>Gain-share agreement maximises potential additional sustainable savings that may be realised above contractual agreement.</p>	<p>Gross savings accrued over the first two full years of implementation cover consultancy costs, such that net savings are only realised in year 3.</p>

Appendix B - Background information

13. The SEND Transport Service in Haringey provides vehicle transport, transport buddying and travel training services for those of our children and young people for whom journey to and from school or college is either impossible or is very challenging as a result of a child's special educational needs. Often a child with SEND is being educated at some distance from their home. The service provides for children and young people with a very wide variety of needs, including but not limited to those confined to wheelchair use or where their needs mean that independent travel without specific training or support can be challenging. Our families rely on our transport service to ensure that their children are able to access education reliably and as effectively as possible. The service is imperative to ensuring attendance at school is consistent, reducing stress in our families and ensuring that there is equality of access and opportunity for all.
14. We require a service that is robust, dependable and secures confidence for every single one of our families. At the current time the transport delivery isn't optimal, due to a number of reasons including the range of good quality providers available and the application of internal and external processes. The implications of these services not working most effectively are felt not just for the young person who misses or is late for education, but for parents and carers whose ability to attend work may be impacted, and also for any siblings who undoubtedly feels the impact when the family is under stress.
15. Our children, young people, parents, carers and wider family members, deserve a service which delivers to the very highest standard and meets the needs of all of our family without fail. We should always be aiming for this as an absolute minimum. This report sets out how we intend to secure this.

Overview of Scoping Review Findings and Haringey's Requirements

16. An external scoping review was undertaken by Edge Public Solutions Ltd during April and May 2019 of the delivery of SEND transport services in Haringey, covering transport and travel arrangements for children and young people to education and adults to day care. The review found opportunities to improve service, customer focus, resilience and that there is currently a real opportunity to deliver net savings of at least £600,000 per year.
17. The transport and travel service provide travel arrangements to circa 550 children and young people to education every day. This is currently carried out through 90 contracted routes with 8 suppliers and requires approximately 80 escorts and 33 travel buddies each day who are employed directly by the Council or through agency arrangements. A team of four officers currently organise this operation and the total cost of providing this service was £4.8million in 2018/19.
18. The review made some key headline observations, most importantly, that expectations from parents, carers and schools is high and that they want the service they receive to be improved. In meetings with Headteachers and parents there was strong feedback suggesting poor communication, poor responsiveness and lack of proper consultation on changes, other than big events, by Haringey's Transport team. Despite smaller 'transport clinics' being initiated, these were not

considered to have effected any significant changes or improvements and the range of offers to our families remained the same. Similar issues to those outlined above were raised through the Fairness Commission during its recent consultation between November 2018 to March 2019.

19. In addition to the above, there also appeared to be a lack of understanding across parents of the Council's obligations and policy in respect of the transport service and the statutory role it performs. For example:

- The policy needs to clarify use of personal budgets for travel.
- The policy needs to set clear expectation in regard to the allocation of 'travel escorts'.

20. The report also contained several recommendations as summarised below:

20.1. Reporting and performance data are not clearly produced, and this means we have missed opportunities to analyse and improve service delivery. For example, the database and systems available could be utilised much better to provide indication of where we can streamline service, consolidate routes and generally provide a much more joined up service that meets our families' needs while at the same time allows us to provide a more 'efficient' service in all aspects. Governance of transport could be significantly improved, and, with this improvement, we can more easily hold the service to account for performance and the value achieved, which is currently not transparent.

20.2. There are some exemplar practices in tactical routing (including group pick up and multiple school drop off arrangements) but there is little evidence of a periodic strategic overhaul of our routes. Consequently, over years, routes have evolved to be less than effective. Furthermore, there is no software applied to this process which has been proven elsewhere to add real value and provide our customers with real time information on their transport such as any delays.

20.3. The supply market is not mature, engaged and competitive. Only 8 suppliers are currently used, and yet there are 52 suppliers listed on our framework within 3 miles of Wood Green and 250 within 5 miles. Prices appear to be erratically calculated across suppliers, and on average we believe that prices are around £1 per mile more than they are in Camden, and 200% more than the standard tariff that would be charged if a Hackney Carriage was used. Given the Council procures at least 250,000 miles per year as part of its SEND transport delivery, securing better value from the private hire supply would provide a significant opportunity to release savings of around £0.25m (based on prices being reduced by a £1 a mile to a level charged for in Camden).

20.4. The total number of escorts that the Local Authority currently employs (circa 70) appears high against indicators from other London authorities.

20.5. The average cost per passenger is £6,750 per year which is slightly higher than other London authority comparators, but it is significantly higher than expected given that Haringey has been exceptionally good at combining passengers into group transport on larger vehicles rather than single person journeys.

- 20.6. The travel policy is clear but there is challenge from families and professionals on the application of the policy both within the council and from wider professionals. The process for determining travel eligibility and then determining the best form of travel for individuals requires review so that consistent decisions can be made, and that families and professionals are clear on travel and transport eligibility. Previous reviews have recommended that families apply online however this process has proven difficult and cumbersome to implement and as a result there have been delays in planning routes and feeding back to families. Families are keen for a review of the processes including application and the way that routes are planned.
- 20.7. There are some exemplar practices and progress in the use of buddies who help children build up their confidence in travelling and focus on independence (as appropriate). There are likely to be significant opportunities to extend this further, with 45% of all passengers currently receiving travel while being under statutory distance requirements. i.e. there are many opportunities to consider alternative travel arrangements other than daily transport via bus or cab.
- 20.8. Finally, the review finds that while the transport team are passionate about providing a good and robust service, it needs additional capacity and very specialist support to drive forward service improvements effectively and strategically. This includes having the resources to be able to focus on customer communications or make the changes to benefit our families from the opportunities highlighted in this review.
21. The review proposed several headline initiatives to improve services for children, young people, and families and to make the service more efficient. These include:
- 21.1. Overhauling the routing of all journeys holistically across the service in a way that best considers the needs of passengers and the most effective resources available, including the commissioning and implementation of a routing software package;
- 21.2. using strategic sourcing methodologies to develop the provision and improve the competition and value achieved from private hire providers at procurement and throughout the life of the contract;
- 21.3. Improving the overall performance of the Transport team and how it operates alongside wider SEND teams and other teams involved, including the performance of contacted suppliers;
- 21.4. Introducing a widespread cultural change and management of the expectations of parents, schools, transport users and internal services such as SEND, so that Haringey's offer moves to the provision of 'travel support' in the most cost effective way and in a manner that further supports the already good work to make independence of passengers a key focus, and this supported by changes to policy; and
- 21.5. In the context of changing expectation and drive to independence, carry out a re-evaluation of all passengers to ascertain their travel eligibility and bespoke requirements.

Sustainability, Service Resilience, Team Upskilling and Development

- 21.6. All initiatives and performance improvements must be delivered in a sustainable way. The travel team must be structured and developed with adequate capacity, and capability to support this effort must be identified and secured. This capacity, knowledge and expertise to lead and support this two/three-year programme is not currently available in the Council.
- 21.7. The review highlighted several important observations in respect of the Travel team's current capacity and their need for support to improve service delivery.
- 21.8. The current team structure/resources are insufficient to operate and effectively drive forward the necessary service transformation. The Travel Team presently comprises of:
- Manager (4 days per week)
 - Escort coordinator
 - Assistant Escort coordinator
 - Escort charge-hand
 - Buddy co-ordinator (agency)
- 21.9. The structure of the team does not clearly identify accountabilities for key tasks or allow for the deputising of the Team manager when required. This lack of accountability and flexibility in the team needs to be addressed if the service is to deliver to a high standard and support the wider aims of the SEND service.
- 21.10. Feedback from Service Users indicates that significant improvements could be made to how the Team consults and communicates with families and how it resolves issues that arise in a timely fashion.
- 21.11. The team's visibility of performance measures and accountability for value being achieved are not evident. Some key tasks are not being completed, for example contractor audits.
- 21.12. The capacity of the team with the right skill level to lead changes and innovative new ways of operating is lacking.
- 21.13. Therefore, not only will it be necessary for a transformation partner to effectively deliver savings, but it will also be necessary to develop and redefine the team so that the structure, capacity and skills are able to improve service levels and ensure improvement becomes an intrinsic part of the service.

Appendix C

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 between those with a 'relevant protected characteristic' and those without one;
- Fostering good relations between those with a 'relevant protected characteristic' and those without one.

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	Transport Review
Service area	Special Educational Needs and Disabilities
Officer completing assessment	Vikki Monk-Meyer
Equalities/ HR Advisor	Hugh Smith
Cabinet meeting date (if applicable)	8 th October 2019
Director/Assistant Director	Eveleen Riordan

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 council wishes to commission an external provider to review all aspects of the travel and transport service provided to children and adults with special educational needs and disabilities. The external review will cover:

- how decisions are made about whether and how to provide transport services to children and adults,
- the application and review process,
- how the routes are planned and delivered for children and adults,
- the staffing requirements of the service and range of commissioned vehicle providers,
- improvement of the services' external communications with schools and families.

The ultimate aim is to ensure the service is as cost effective as possible, whilst also supporting local resident's needs.

The majority of children and adults who use services provided by the travel and transport service are those attending special schools both in and out of the borough, although some adults with complex needs also travel to day centres and respite and also use the services. Key stakeholders are therefore;

- Those who have a special educational need and/or disability (SEND) and require travel assistance to access school or other educational services
- Users of adult social care that require supported transport to access care settings
- Parents of those children and young people with SEND or carers of those eligible for adult social care
- Residential homes/supported living

The service provides supported travel arrangements for over 500 children and young people needing assistance to travel to their educational establishment. The Council also currently provides supported travel to around 150 adults who need assistance in travelling to adult care services.

Supported travel arrangements can include (i) Haringey's in-house transport service, (ii) commissioned transport services from external providers, (iii) provision of an escort, and (iv) support with travel arrangements on public transport. The service's delivery of travel training and buddying will be maximised to promote young people's independence where possible.

The Council has a statutory requirement to have a Sustainable Modes of Travel Strategy and a Transport Policy Statement in place.

Nationally safe and efficient school transport and travel is a primary need for families of children with SEND. Locally we offer transport for children in line with our travel policy which includes the aspirations to promote independence as far as possible, whilst ensuring children can attend to school in a timely way. The transport service has worked hard to implement new initiatives to support these aspirations, including travel buddies and independent travel training. As with many boroughs, the transport service is high cost for the number of children being transported. Currently 525 children and young people receive the service. The demand on the service are increasing in line with our new statutory duties to transport young people if they remain in education, which means a new cohort are being transported who are between the ages of 19 and 25 years. The combination of the above has placed additional strain on the current service provision and budget, resulting in both an overspend and also increased parental dissatisfaction.

In order to decide on whether an external provider needs to carry out this review, the service has spoken to local special schools and families about their views of the service and what they would like to see improved. The service has concluded that there is not the local capacity to thoroughly review all the above aspects of the service, and therefore an external provider is needed. There has therefore been a tender process with a range of transport specialists applying for the role of external reviewer. As a result of that tender process Edge has been successful candidate and we wish to award this company the contract.

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	SEND Service Data	
Gender Reassignment	SEND Service Data	
Age	SEND Service Data	
Disability	SEND Service Data	
Race & Ethnicity	SEND Service Data	
Sexual Orientation	ONS	
Religion or Belief (or No Belief)	Census 2011	
Pregnancy & Maternity	ONS	
Marriage and Civil Partnership	Not applicable	

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.

There are only a small number of staff in the transport team, so to analyse their specific characteristic risks them being identified and risks revealing personal information. An EQIA has therefore not been carried out on the staff group. The Council and the appointed contractor will take appropriate measures to ensure that no member of staff experiences discrimination, harassment, or victimisation.

The data used to inform the EQIA is the population of children and young people in Haringey who have an education health and care plan as this is the group of users most likely to use the service and from the joint strategic needs assessment.

Sex

25% of children and young people who have an education health and care plan are female and 75% are male, compared to an approximately even split in the wider

population of children and young people. This indicates that males are overrepresented among those likely to be affected by the proposal

Gender Reassignment

Fewer than five children and young people who have an education health and care plan identify with a gender different to the one with which they were assigned at birth.

Age

Age break down of children and young people accessing supported travel:

- 5- 9-year olds 19%
- 10- 14-year olds 36%
- 15 – 18-year olds 30%
- 19 -25-year olds 15%
-

This indicates that 85% of those likely to be affected by the decision are children and 15% are adults

Disability

All service users have some form of disability. The proportions of those disabilities among those using SEND transport is as follows:

- Learning disabilities /Autistic 31%
- Wheelchair user 13%
- Cerebral palsy 7%
- Down Syndrome 4%
- Blind/visually impaired 4%
- Various other disabilities 41%

Race and Ethnicity

39% service users described themselves as white, 33% are black/black Caribbean and black British 6% Asian and Asian British with the remainder from a range of ethnic groups or mixed background. Compared to all children and young people in Haringey, the service user cohort has a smaller proportion of individuals from BAME communities.

Sexual Orientation

Office for National Statistics data indicates that at a national level young people are more likely to identify as LGB than the population as a whole. Within the 16 to 24-year-old category 3.3% identify as LGB, compared to 1.7% of the general population. The data also indicates that London has a higher proportion of residents identifying as LGB than the national population.

Religion or Belief

Census 2011 data indicates that 42% of 8-19-year-olds in Haringey are Christian, 23% are Muslim, 4% are Jewish, 1% are Buddhist, 1% are Hindu, fewer than 1% are Sikh, and 19% have no religion.

Pregnancy and Maternity

The conception rate among SEND transport service users is not recorded. ONS data on under 18 conception rates in the year to September show an under-18 conception rate in Haringey 2016 of 20.3 per 1000 compared to the rate for London (17.9 per 1000) and for England and Wales (19.3 per 1000).

Marriage and Civil Partnership

The marital status of service users is not recorded. The proposal will not result in any differential impact on those in marriages as opposed to those in civil partnerships.

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 EqlA guidance

Parents of children with disabilities have fed back current concerns about the transport service in terms of planning of routes, types of transport provided and communications from the service. This has come from feedback from events such as the Fairness Commission and also the SEND services public events such as the 'Local Offer' events. Feedback from the Local Offer event is published on the local offer website on: <https://www.haringey.gov.uk/children-and-families/local-offer/about-local-offer/send-local-offer-review-and-action-plan>

This outlines areas that parents and families would like to see change.

The external provider has assured the council in the application and through communication with schools that they will work with local parent groups, SEND service, individuals and settings such as schools to co-produce proposed changes. The provider has a track record of engagement with settings and family groups and would be able to use the SEND service's current established communications as well as proposing a specific working party around progression of the transport changes.

The findings from the transport scoping indicated that key areas to address would be:

- Communication and engagement
- Application of policy
- Expansion of range of transport providers
- Cost comparison of costs per mile and deployment of resources such as escorts
- Planning of routes and size of vehicle
- Maximisation of the independent travel training and buddying schemes

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?

We know that the families want the transport application process to be easier and want the online application changed, they want better understanding of the way that transport routes are planned and have nearer pick up points and smaller vehicles if possible. Parents want to be assured that the staff are well trained and that the vehicles and drivers are of good quality. Parents and families are positive about the independent travel training and transport buddy approaches and want this preserved. The provider has experience in all these areas and has a proven track record in developing services in a way that meets both the children and families' needs and stays within budget.

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 EqlA guidance

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		Negative		Neutral impact	x	Unknown Impact	
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Services are not planned based on an individual's sex. The Transport Service Review is deemed to have no impact on residents of different sexes as the policy is based on needs and applies equally irrespective of sex. There is no indication that residents of different sexes are treated differently under the terms of this policy or are disadvantaged compared to other groups by this policy, although we will continue to keep this under review. While it is notable that the majority of those likely to be affected by any service changes are males, and males therefore constitute the majority of those benefiting from improvements, females will not be disadvantaged in any way.

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)*

We do not think there will be specific impacts for this protected group, but we will ensure that this group are not be subjected to discrimination, harassment and victimisation due to their protected characteristic. Services are not delivered differently according to a person's identified gender

Positive		Negative		Neutral impact	x	Unknown Impact	
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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	
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The Travel Policy and Transport Service applies differently to children and young people who are in education from adults aged 18 or above eligible for Adult Social Care. This is because of the statutory duty on the Council to ensure that all children and young people can access education locally, and to ensure that complex disabilities or other factors do not present a barrier to this. For adults, the Council's Travel Policy is there to assist those adults who cannot independently travel to adult care services.

The majority of people affected will be children and young people where we anticipate that the impact will be a positive one in terms of journey times and ease of access to transport. If possible, young people who are over the age of 11 years will be offered the opportunity for independent travel training or travel buddying, thus increasing their ability to access leisure and hobbies and work opportunities independently in later life. This will be assessed and planned based on an individual's ability, routes to school and preferences.

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	
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The proposal will ensure that children with SEND who use the transport service are able to have a positive experience to get to school and are able to have their skills developed to maximise their independent travel training abilities. The Transport Service Review is deemed to have a positive impact upon residents with disabilities as it ensures that they will be able to access schools/services which meet their needs and are not discriminated against by being unable to access them due to not being able to get there.

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		Negative		Neutral impact	x	Unknown Impact	
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Services are not planned based on a child's race or ethnicity. The Transport Service Review is deemed to have no impact on residents of different races and ethnicity as the policy is based on needs and applies equally irrespective of ethnicity. There is no indication that residents of different races and ethnicity are treated differently under the terms of this policy or are disadvantaged compared to other groups by this policy, although we will continue to keep this under review and address any inequalities in a timely and proportionate way.

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)

Services are not planned based on a person's sexual orientation. The Transport Service Review is deemed to have no impact on residents of different sexual orientations as the policy is based on needs and applies equally irrespective of sexual orientation. There is no indication that residents of different sexual orientation are treated differently under the terms of this policy or are disadvantaged compared to other groups by this policy, although we will continue to keep this under review.

Positive		Negative		Neutral impact	x	Unknown Impact	
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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)*

Services are not planned based on a person's religion or belief. The Transport Service Review takes into consideration children, young people and parent's choice to apply for admission to a particular faith school, even if this is not the closest school to them by travel distance. This will ensure that those children and young people who want to attend a faith school because of their religion/beliefs are not indirectly prevented from doing so because of proximity restrictions on travel support and therefore this is a positive impact of the transport offer.

Positive		Negative		Neutral impact	x	Unknown Impact	
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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)*

The Transport Service Review is deemed to have no impact on residents who are pregnant or who have children under the age of one, as the policy is based on needs and applies equally irrespective of pregnancy/maternity. There is no indication that residents who are pregnant are treated differently under the terms of this policy or are disadvantaged compared to other groups by this policy, although we will continue to keep this under review.

Positive		Negative		Neutral impact	x	Unknown Impact	
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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	
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The Transport Service Review is deemed to have no impact on residents who are married or in civil partnerships, as the policy is based on needs and applies equally irrespective of marital status. There is no indication that residents who are married or in civil partnerships are treated differently under the terms of this policy or are

disadvantaged compared to other groups by this policy, although we will continue to keep this under review.

10. Groups that cross two or more equality strands e.g. young black women

To the extent that these groups are represented in the service user cohort, the proposal will have an impact on:

- Children and young people with SEND
- Girls and young women with SEND
- BAME young people with SEND
- LGBT+ young people with SEND
- Children and young people with SEND from minority faith communities

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 relevant protected characteristics?
- Will the proposal help to advance equality of opportunity between groups who share a relevant 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 relevant protected characteristic and those who do not?

The service review will not result in any direct or indirect discrimination to any of the protected groups.

In particular, the review will help to advance equality of opportunity between those with disabilities and those without by continuing to ensure that those with disabilities are able to access schools that are not local to them, that they would otherwise be unable to access without travel assistance.

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 EqlA guidance

Outcome	Y/N
No major change to the proposal: the EqlA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken. <u>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.</u>	Y
Adjust the proposal: the EqlA 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

<p>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.</p>			
<p>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</p>			
Impact and which relevant protected characteristics are impacted?	Action	Lead officer	Timescale
N/A			
<p>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.</p>			
<p>6 c) Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented:</p> <p>There will be a steering group chaired by the Assistant Director for Schools and Learning and comprising the councils, parents and partner organisations who will be responsible for monitoring the implementation and outcomes of the review and any subsequent changes to the transport service. Outcomes for protected groups will be monitored within this activity and any identified inequity will be rectified</p>			
<p>7. Authorisation</p>			
EqIA approved by Eveleen Riordan (Assistant Director/ Director)		Date	
<p>8. Publication</p> <p>Please ensure the completed EqIA is published in accordance with the Council's policy.</p>			

Please contact the Policy & Strategy Team for any feedback on the EqIA process.

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Report for: Cabinet – 12 November 2019

Title: Determination of the Council's School Admission Arrangements for the academic year 2021/22 – Consultation

Report authorised by: 
Ann Graham, Director of Children Services

Lead Officer: Carlo Kodsi, Head of Admissions, Education and School Organisation
ext. 1823, carlo.kodsi@haringey.gov.uk

Ward(s) affected: All

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

1. Describe the issue under consideration

1.1 This report and the attached appendices set out:

- The proposed admission arrangements for entry to school in the academic year 2021/22 for Haringey's community¹ and voluntary controlled (VC), nursery, infant, junior, primary, secondary and sixth form settings.
- Haringey's proposed scheme for in-year admission for the academic year 2021/22. In-year admission relates to applications which are received at any point throughout the year other than for reception or secondary school transfer.
- Haringey's proposed In-Year Fair Access Protocol (IYFAP) for the year starting 1 March 2020 which all Haringey schools and academies must follow.
- The co-ordinated scheme² for the admission of children to maintained primary and secondary schools and academies for the 2021/22 year of entry.

2. Cabinet Member Introduction

2.1 All schools must have admission arrangements that clearly set out how children will be admitted, including the criteria that will be applied if there are more applications than places at the school. Admission arrangements are proposed and determined by admission authorities. The local authority is the admission authority for the borough's community and VC schools.

¹ A community school in England and Wales is a type of state-funded school in which the local education authority (LEA) employs the school's staff, is responsible for the school's admissions and owns the school's estate.

² The scheme which each Local Authority is required to formulate in accordance with the School Admissions (Admission Arrangements and Co-ordination of Admission Arrangements) Regulations 2012, for co-ordinating arrangements for the admission of children to maintained primary and secondary schools and academies. The co-ordinated scheme has been successful in meeting its main aim of eliminating or greatly reducing multiple offers of school places.

- 2.2 Every local authority must also publish a co-ordinated scheme which sets out the procedures all schools and academies must follow to co-ordinate the admission process for the reception and secondary transfer admissions round to ensure that all residents are offered a school place.
- 2.3 This report seeks Cabinet approval to commence a six-week period of statutory consultation. The details of what is being consulted on is set out in paragraph 3 below.

3. Recommendations

3.1 Cabinet is asked to:

- agree to consult on the proposed admission arrangements, including the proposed in-year admissions scheme for the academic year 2021/22;
- agree to consult on the proposed IYFAP which, if agreed at Cabinet in February 2020, would be come into force from 1 March 2020;
- agree that the co-ordinated scheme for the admission of children to maintained primary and secondary schools as set out in Appendices 2 and 3 of this report can be published on the Haringey website on 1 January 2020;
- note that consultation on the proposed admission arrangements is scheduled to take place between **26 November 2019 and 7 January 2020**;
- note that following the consultation, a report will be prepared summarising the representations received from the consultation and a decision on the final admission arrangements and the In-Year Fair Access Protocol will be taken by Cabinet in February 2020.
- note that at the November 2019 Cabinet meeting, the Council's Cabinet is due to make a decision in a separate report on whether to agree to the recommendation to publish a statutory notice on the amalgamation of Stamford Hill Primary with Tiverton Primary School. If it were to go ahead, this will result in displaced pupils transferring to Tiverton Primary School.³

4. Reasons for decision

- 4.1 **Why do we consult?** - This report and the consultation that will flow from it *if* the report's recommendations are agreed will ensure that our proposed admission arrangements for 2021/22 are consulted upon and the co-ordinated scheme is set in accordance with the mandatory provisions of the School Admissions Code 2014.
- 4.2 The School Admissions Code (2014) requires all admission authorities to publicly consult on their admission arrangements where changes are being proposed. The Code stipulates that if no changes are made to admission arrangements, they must be consulted on at least once every 7 years.
- 4.3 We consult on our admission arrangements annually irrespective of whether or not there is a proposed change to the arrangements⁴. This is to ensure transparency and

³ In July 2019, Cabinet agreed that a formal consultation would be carried out between 9 September and 21 October 2019 on the future of Stamford Hill Primary and the Council's preferred option of amalgamation with Tiverton Primary School. More information can be found on the [Haringey website](#).

⁴ The Schools Admission Code 2014 (para 1.42) sets out that when changes are proposed to admission arrangements, all admission authorities **must** consult on their admission arrangements (including any supplementary information form) that will apply for admission applications the following school year. Where the

openness on the contents of our arrangements and to allow parents, carers and other stakeholders who might not previously been interested in admission arrangements (perhaps because they didn't have a child of school age) to make a representation which can then be considered as part of the determination of the arrangements.

5. Alternative options considered

- 5.1 We are required by the School Admissions Code 2014 (para 1.42 – 1.45 of the Code) to carry out any consultation on our admission arrangements between 1 October and 31 January each year for a minimum period of six weeks. We are not proposing any changes to the proposed admission arrangements for the year 2021/22. As set out in para 4.3 above, we consult annually on our arrangements irrespective of whether we are proposing any changes, to allow transparency and openness in the process.
- 5.2 This year we are not proposing a change to the oversubscription criteria for community and VC schools. 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, identified feeder schools or giving priority in our oversubscription criteria to children eligible for the early years premium/ pupil premium) no alternative option is being considered at the time of writing this report.

6. Background information

- 6.1 Ensuring there is a transparent and objective school admissions process is a statutory and integral part of the Council's work. Oversubscription criteria must be reasonable, clear, objective, procedurally fair, and comply with all relevant legislation, including equalities legislation. Admission authorities must ensure that their arrangements will not disadvantage unfairly, either directly or indirectly, a child from a particular social or racial group, or a child with a disability or special educational needs, and that other policies around school uniform or school trips do not discourage parents from applying for a place for their child.
- 6.2 The Council is the admission authority for community and voluntary controlled (VC) schools within the borough and is therefore responsible for determining the admission arrangements for these schools.
- 6.3 Academies, foundation schools and voluntary aided (VA) schools are their own admissions authority; they must consult on and then determine their own admissions arrangements by 28 February 2020. The Council has a statutory duty to monitor the arrangements determined by own admitting authority schools to ensure compliance with the School Admissions Code 2014. This report does **not** deal with admission arrangements for any academies, foundation or voluntary aided schools.
- 6.4 All schools must have admission arrangements that clearly set out how children will be admitted, including the criteria that will be applied if there are more applications than places at the school.
- 6.5 Admission authorities are responsible for admissions and must act in accordance with the School Admissions Code (2014), the School Admission Appeals Code (2012), other laws relating to admissions, and relevant human rights and equalities legislation.

Oversubscription criteria

admission arrangements have not changed from the previous year there is no requirement to consult, subject to the requirement that admission authorities **must** consult on their admission arrangements at least once every 7 years, even if there have been no changes during that period.

- 6.6 The admission authority for the school must set out in their arrangements the criteria against which places will be allocated at the school when there are more applications than places and the order in which the criteria will be applied.
- 6.7 Oversubscription criteria must be reasonable, clear, objective, procedurally fair, and comply with all relevant legislation, including equalities legislation.
- 6.8 Admission authorities must ensure that their arrangements will not disadvantage unfairly, either directly or indirectly, a child from a particular social or racial group, or a child with a disability or special educational needs, and that other policies around school uniform or school trips do not discourage parents from applying for a place for their child.
- 6.9 Admission arrangements must include an effective, clear and fair tie-breaker to decide between two applications that cannot otherwise be separated.

In Year Fair Access Protocol (IYFAP)

- 6.10 An In-Year Fair Access Protocol (IYFAP) has been agreed in Haringey to ensure unplaced children, especially the most vulnerable, are offered a school place without delay and is a statutory requirement set out in the School Admissions code 2014 (paras 6 and 3.9 – 3.15 of the Code). In using the Protocol, it ensures that these children and young people are shared fairly across all Haringey schools and that this process is open and transparent. Haringey's Protocol is consulted on annually and para 3 of the Protocol in Appendix 5 sets out that "it is essential to the success of IYFAP that all Head teachers and governing bodies agree to the aims, principles and procedures and give their fullest support."

Consultation

- 6.11 Where changes are proposed to admission arrangements, the admission authority must first publicly consult on those arrangements. The Code stipulates that if no changes are made to admission arrangements, they must be consulted on at least once every 7 years. Consultation must be for a minimum of 6 weeks and must take place between 1 October and 31 January in the year before those arrangements are to apply.
- 6.12 This consultation period allows parents, other schools, religious authorities and the local community to raise any concerns about proposed admission arrangements.
- 6.13 Admission authorities **must** consult with:
- a. parents of children between the ages of two and eighteen;
 - b. other persons in the relevant area who in the opinion of the admission authority have an interest in the proposed admissions;
 - c. all other admission authorities within the relevant area (except that primary schools need not consult secondary schools);
 - d. whichever of the governing body and the local authority who are not the admission authority;
 - e. any adjoining neighbouring local authorities where the admission authority is the local authority; and
 - f. in the case of schools designated with a religious character, the body or person representing the religion or religious denomination.
- 6.14 This report will ask for approval from Cabinet to consult on our proposed admission arrangements between 27 November 2019 – 7 January 2020.

Proposed consultation and determination timetable

Stage	What happens	Dates and timescales
1	Consultation on admission arrangements which includes: <ul style="list-style-type: none"> • Nursery arrangements • Reception class and junior admissions • Secondary admissions • In-year admissions • In year fair access protocol • Sixth form admissions 	26 November 2019 to 7 January 2020
2	Cabinet to: <ul style="list-style-type: none"> • determine the admission arrangements for Haringey community schools, nursery classes, primary, infant, junior and secondary schools and St Aidan's voluntary controlled School. • determine the admission arrangements for students starting sixth form. • determine the In-Year Fair Access Protocol (IYFAP). 	February 2020
3	Last date by which all admission authorities, including academies, can determine admission arrangements	28 February 2020
4	Determined admissions arrangements must be published on LA website	15 March 2020

6.15 To ensure as wide a consultation as possible we intend to provide details of the proposed admission arrangements in the following ways:

- through the Schools Bulletin which is distributed to the headteacher and chair of governors of every school in the borough
- to all children's centres in the borough
- to all registered nurseries and child minders and any other early years providers
- on the Council's online primary and secondary admissions page
- via information in all libraries across the borough
- to all councillors
- to both MPs with constituencies in Haringey
- to the diocesan authorities
- to neighbouring authorities
- other groups, bodies, parents and carers as appropriate.

Co-ordinated scheme

- 6.16 Each year all local authorities must formulate and publish on their website a scheme by 1 January in the relevant determination year to co-ordinate admission arrangements for all schools within their area.
- 6.17 All admission authorities must participate in co-ordination and provide the local authority with the information it needs to co-ordinate admissions by the dates agreed within the scheme. Local authorities must make application forms available to parents who wish to apply to a school in a neighbouring area which operates a different age of transfer (e.g. middle schools), and process these as it would in its normal admissions round.

7. Contribution to strategic outcomes

- 7.1 Ensuring we have a transparent and objective school admissions process with oversubscription criteria that is reasonable, clear, objective and compliant with all relevant legislation, including equalities legislation, underpins Priority 1 in the Corporate Plan which seeks to enable every child to have the best start in life with access to high quality education.

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

- 8.1 Below are financial, governance and legal and equality comments.

Comments of the Chief Finance Officer and financial implications

- 8.2 The Chief Financial Officer has been consulted in the production of this report and confirms that there are no direct financial implications as a result of the consultation proposals.

Comments of the Assistant Director of Corporate Governance and legal implications

- 8.3 The Assistant Director of Corporate Governance has been consulted on the contents of this report and comments as follows: The current School Admissions Code ('the Code') came into force in December 2014 issued by the Department for Education under section 84 of the School Standards and Framework Act 1998. The Code is to be read alongside the School Admissions (Admission Arrangements and Co-ordination of Admission Arrangements) (England) Regulations 2012 ("the Regulations"). The Code and the Regulations apply to admission arrangements determined in 2015 and later years. In determining its admission arrangements for 2021-2022 the Council has a statutory duty as an admissions authority to act in accordance with the Regulations and with the relevant provisions of the Code. It must also as a result of its duty under section 149 of the Equality Act 2010 have due regard to the need to eliminate discrimination, harassment and victimisation and any other conduct which is prohibited by or under the Act, advance equality of opportunity, and foster good relations in relation to persons who share a relevant protected characteristic and persons who do not share it.
- 8.4 Paragraph 15 of the Code states that all schools must have admission arrangements that clearly set out how children will be admitted including the criteria that will be applied if there are more applications than places at the school. As part of determining its admission arrangements, the Council must set an admission number (called the Published Admission Number or PAN) for each school's "relevant age group" i.e. the age group at which pupils are or will normally be admitted to the school.

- 8.5 School admission arrangements are determined by admission authorities. Generally, the admission authority for community and voluntary controlled schools is the local authority. Admission authorities must set ('determine') admission arrangements annually. Where changes are proposed to admission arrangements, the admission authority must first publicly consult on those arrangements. If no changes are made to the admission arrangements, they must be consulted on at least once every 7 years. Consultation must be for a minimum of 6 weeks to take place between 1 October and 31 January of the determination year. The Code also requires the admissions authority for the duration of the consultation to publish a copy of the full proposed admission arrangements (including the proposed PAN) on their website together with details of the person within the admissions authority to whom comments may be sent and the areas on which comments are not sought. Consultation must be undertaken when proposals are still at a formative stage. It must include sufficient reasons for particular proposals to allow those consulted to give intelligent consideration and an intelligent response, adequate time must be given for this purpose and the product of the consultation must be conscientiously taken into account when the ultimate decision is taken.
- 8.6 In relation to consultation the Council must consult with parents of children between the ages of two and eighteen; other persons in the relevant area who in the opinion of the admission authority have an interest in the proposed admissions; all other admission authorities within the relevant area; whichever of the governing body and the local authority who are not the admission authority; any adjoining neighbouring local authorities where the admission authority is the local authority and in the case of faith schools, the body or person representing the religion or religious denomination. The authority must also for the duration of the consultation publish a copy of the full proposed admission arrangements (including the PAN) on its website together with details to whom comments should be sent and the areas on which comments are not sought.
- 8.7 It is the responsibility of the authority to ensure that admission arrangements are compliant with the Code. Arrangements mean overall procedures, practices, criteria and supplementary information to be used in deciding on the allocation of school places. In drawing up the arrangements, the authority must ensure that the practices and criteria used are reasonable, fair, clear and objective and comply with the relevant legislation including equalities legislation. Parents should be able to look at the set of arrangements and understand easily how places will be allocated. It is for the authority to decide which criteria would be the most suitable according to local circumstances.
- 8.8 Each year all local authorities must formulate and publish on their website a scheme by 1 January in the relevant determination year to co-ordinate admission arrangements for all publicly funded schools within their area. All admission authorities must participate in co-ordination and provide the local authority with the information it needs to co-ordinate admissions by the dates agreed within the scheme. There is no requirement for local authorities to co-ordinate in-year applications but the authority must provide information in a composite prospectus as to how in-year applications can be made and how they will be dealt with.
- 8.9 The Code requires that the Council must have a Fair Access Protocol agreed with the majority of schools in its area to ensure that, outside the normal admissions round, unplaced children, especially the most vulnerable, are offered a place at a suitable school as quickly as possible. The Cabinet Members will see the Proposed In-Year Fair Access Protocol at Appendix 5.
- 8.10 The proposed admission arrangements for 2021-2022, the proposed co-ordinated scheme, the proposed IYFAP and the proposed consultation on the proposed

admission arrangements for 2021-2022 would appear to be in compliance with the Code and the Regulations.

Equalities and Community Cohesion Comments

- 8.11 The Council has a public sector equality duty under the Equalities Act (2010) to have due regard to the need to:
- Eliminate discrimination, harassment and victimisation and any other conduct prohibited by or under the Act. Advance equality of opportunity between people who share a “relevant protected characteristic” and people who do not share it;
 - Foster good relations between people who share those a “relevant protected characteristic” and people who do not share it.
 - A “relevant protected characteristic” is age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex (formerly gender) and sexual orientation.
- 8.12 The proposed admission arrangements set out in this report comply with the public sector equality duty and ensures that as an admission authority, the Council’s arrangements do not directly or indirectly unfairly disadvantage an individual or group that possesses any of the characteristics defined in sections 4-12 of the Equality Act 2010.
- 8.13 An Equalities Impact Assessment (EqIA) was previously undertaken and the proposed admission arrangements for 2021/22 do not differ materially from the arrangements for previous years. We therefore do not consider that another full equality impact assessment is necessary at this stage. We have continued to monitor and assess the impact of any changing trends – please see updated information in Appendix 7 for the EqIA.
- 8.14 The consultation process will be used to help populate and inform the final version of the updated EqIA which decision makers will consider.

9. Use of Appendices

- 9.1 The following appendices support this report:
- Appendix 1** Proposed admission criteria for nursery 2021
 - Appendix 2** Proposed admission criteria for reception and junior admissions 2021 (including the co-ordinated scheme)
 - Appendix 3** Proposed admission criteria for secondary 2021 (including the co-ordinated scheme)
 - Appendix 4** Proposed scheme for in-year admissions 2021
 - Appendix 5** Proposed In-Year Fair Access Protocol for Haringey schools
 - Appendix 6** Proposed admission criteria for Sixth Form 2021
 - Appendix 7** EqIA
- 9.2 The full papers for this report can be viewed electronically on the Council’s website at or in paper form at 7th Floor, River Park House, 225 High Road, London, N22 8HQ.

10. Local Government (Access to Information) Act 1985

- 10.1 This report contains no exempt information.

Background

1. The Schools Standards and Framework Act 1998.

2. The Education Act 2002.
3. The Education and Inspections Act 2006.
4. Education and Skills Act 2008.
5. The School Admissions Code (December 2014).
6. The School Admissions (Admission Arrangements and Co-ordination of Admission Arrangements) (England) (Amendment) Regulations 2014
7. The School Admissions (Infant Class Sizes) (England) Regulations 2012.
8. The School Admissions (Appeals Arrangements) (England) Regulations 2012.
9. The Education Act 2011.
10. The School Admissions Appeals Code (2012).

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Starting Nursery in Haringey in September 2021

Proposed Admission Criteria for Nursery Classes in Community Primary Schools and St. Aidan's VC School

Children may have a part-time place in a nursery centre or a class attached to a school in the September following their third birthday. If there are more requests than part-time places available, the admission rules (over-subscription criteria) explained below will be used to decide which children will be admitted. There is no right of appeal against the decision to refuse admission of children to nurseries.

Parents/carers should note that admission to a nursery class in a school does not guarantee a place in the reception class at the same school. Parent/carers must complete their home authority School Admissions Application Form, which will be available on line, by 15 January in the academic year their child turns four.

Proposed Admission Criteria for part time places

When the school is oversubscribed, after the admission of pupils with an Education, Health and Care plan or statement of special educational needs naming the school, priority for admission will be given to those children who meet the criteria set out below, in priority order:

1. Children in Care/Looked After Children

Children who are looked after by a local authority or were previously looked after but immediately after being looked after, became subject to an adoption, child arrangements, or special guardianship order.

A looked after child is a child who is (a) in the care of a local authority, or (b) being provided with accommodation by a local authority in the exercise of their social services functions (see the definition in Section 22(1) of the Children Act 1989).

2. Social/Medical

Children who the Authority accepts have an exceptional medical or social need for a place at one specific school. Applications will only be considered under this category if they are supported by a written statement from a doctor, social worker or other relevant independent professional. The information must confirm the exceptional medical or social need and demonstrate how the specified school is the only school that can meet the defined needs of the child.

3. Brother or Sister (sibling)

Children who will have a brother or sister attending the school (or its associated Infant or Junior school) at the time of admission. A sibling is a full brother or sister, a step/half brother or sister, a foster brother or sister or an adopted brother or sister living at the same address as the child for whom the application is being made.

4. Children of staff

Children whose parent is a member of teaching staff who has been employed at the school for two or more years at the time of application or has been recruited to fill a vacancy for which there is a demonstrable skill shortage.

5. Distance

Children whose home address is closest to the preferred school.

Distance will be measured in a straight line from the Ordnance Survey address point of the child's home to the Ordnance Survey address point of the school, calculated using a computerised mapping system.

Tie breakers

The tie breaker to decide between two applications that cannot otherwise be separated is children whose home address is closest to the school measured in a straight line from the Ordnance Survey address point of the child's home to the Ordnance Survey address point of the school, calculated using a computerised mapping system.

The tiebreak for two or more applications whose home address is exactly the same distance from the school (and who are not from multiple births) will be random allocation using a computerised system.

Multiple births

If only one place is available and the next child who qualifies for a place is one of multiple birth, the nursery centre or the school will go over their published admission number.

Notes

- (i) Home address is defined as the child's only or main residence
- (ii) Priority for children of teaching staff will be limited to one place for each form of entry in any year. Exception to this will apply to children of multiple birth or those born in the same academic year. All such applications must be submitted to the local authority and must be accompanied with the relevant paperwork supporting an application on these grounds. The applicant must take sole responsibility to provide such paperwork. Without the provision of the relevant papers, priority will not be given on these grounds.

Proposed Admission Criteria for Reception and Junior Admissions 2021

Oversubscription criteria

When the school is oversubscribed, after the admission of pupils with an Education, Health and Care plan or statement of special educational needs naming the school, priority for admission will be given to those children who meet the criteria set out below, in priority order:

1. Children in Care/ Looked After Children

Children who are looked after by a local authority or were previously looked after but immediately after being looked after, became subject to an adoption, child arrangements, or special guardianship order.

A looked after child is a child who is (a) in the care of a local authority, or (b) being provided with accommodation by a local authority in the exercise of their social services functions (see the definition in Section 22(1) of the Children Act 1989).

2. Social Medical

Children who the Authority accepts have an exceptional medical or social need for a place at one specific school. Applications will only be considered under this category if they are supported by a written statement from a doctor, social worker or other relevant independent professional. The information must confirm the exceptional medical or social need and demonstrate how the specified school is the only school that can meet the defined needs of the child.

3. Linked school

This rule applies only to junior school admissions. Applicants attending an infant school will be prioritised under this rule for admission to the linked junior school. The Linked infant and junior schools in Haringey normally share the same names (e.g. Rokesly Infant School is linked to Rokesly Junior School) with the exception of St Peter-in-Chains Infant School and St Gildas' Junior School.

4. Brother or Sister (sibling)

Children with a brother or sister already attending the school or linked infant/junior school and who will still be attending on the date of admission.

If a place is obtained for an older child using fraudulent information, there will be no sibling connection available to subsequent children from that family.

5. Children of staff

Children of teaching staff of the school where the member of staff has been employed at the school for two or more years at the time of application and/or children of a member of staff who has been recruited to fill a vacancy for which there is a demonstrable skill shortage.

6. Distance

Children whose home address is closest to the preferred school.

Distance will be measured in a straight line from the Ordnance Survey address point of the child's home to the Ordnance Survey address point of the school, calculated using a computerised mapping system.

Tie breakers

The tie breaker to decide between two applications that cannot otherwise be separated is children whose home address is closest to the school, measured in a straight line from the Ordnance Survey address point of the child's home to the Ordnance Survey address point of the school, calculated using a computerised mapping system.

The tiebreak for two or more applications whose home address is exactly the same distance from the school (and who are not from multiple births) will be random allocation using a computerised system.

Multiple births

If only one place is available at the school and the next child who qualifies for a place is one of multiple birth, we will ask community schools to go over their published admission number.

Notes

- (i) Home address is defined as the child's only or main residence.
- (ii) A sibling is a full brother or sister, a step/half brother or sister, a foster brother or sister or an adopted brother or sister living at the same address as the child for whom the application is being made.
- (iii) Priority for children of teaching staff will be limited to one place for each form of entry in any year. Exception to this will apply to children of multiple birth or those born in the same academic year. All such applications must be submitted to the local authority and must be accompanied with the relevant paperwork supporting an application on these grounds. The applicant must take sole responsibility to provide such paperwork. Without the provision of the relevant papers, priority will not be given on these grounds.
- (iv) Haringey measures distance in a straight line from the Ordnance Survey address point of the child's home to the Ordnance Survey address point of the school, calculated using a computerised mapping system. Measurements by alternative systems or to other points will not be taken into account in any circumstances. Where applicants have identical distance measurements, priority amongst them will be determined at random using a computerised system.

Deferred entry - before compulsory school age

Children will normally be admitted to the reception year in the September following their fourth birthday. In line with the Admissions Code (2014), parents can defer their child's entry to the reception year until later in the school year, where they have been offered a place at a school to start before they are of compulsory school age. Where entry is deferred, the school will hold the place for that child and not offer it to another child. However, entry cannot be deferred beyond the point the child reaches compulsory school age nor beyond the beginning of the final term of the Reception Year. Parents can also request that their child attends part-time until he/she reaches compulsory school age.

Summer born – Children educated outside their chronological age group

Paragraph 2.17 of the School Admissions Code (2014) states that the parents of a summer born child may choose not to send that child to school until the September following their fifth birthday and may request that they are admitted out of their normal age group – to reception rather than year 1.

The Council, as the admission authority for Haringey community and voluntary controlled (VC) schools will make a decision regarding summer born requests on the basis of the circumstances of the case and in the best interests of the child concerned. This will include taking account of the child's individual needs and abilities and to consider whether these can best be met in Reception or Year one. It will also involve taking account of -

- the parents' views
- information about the child's academic, social and emotional development
- where relevant their medical history and the views of a medical professional
- whether they have previously been educated out of their normal age group
- whether they may naturally have fallen into a lower age group if it were not for being born prematurely, and
- the potential impact on the child of being admitted to year one without first having completed the reception year.

The views of the headteacher will be an important part of this consideration.

Parents should write to the Council giving reasons for their request. This should be accompanied by an application for the child's actual year group. The application will be processed and a school place will be secured in the child's actual year group. This place can later be withdrawn if the request for delayed admission is approved. Parents who are granted their request must then make a fresh application on paper which will be considered in accordance with the school's oversubscription criteria in the event of oversubscription. The decision will be reviewed once the child has started school at intervals agreed by the family and the school.

Consideration to these requests will be taken by a panel of Haringey officers in the summer term of the year in which the child will be admitted to his or her correct age group. The panel will meet following the primary National Offer Day. If the parents would like to make an application for an own admission authority school, they will need approach the relevant school with their request.

Parents have a statutory right to appeal against the refusal of a place at a school for which they have applied. This right does not apply if they are offered a place at the school but it is not in their preferred age group.

Published Admission Numbers (PAN)

The published admission numbers for Haringey community primary schools (and St Aidan's VC Primary) for the 2020/21 school year will be as follows:

School	Admission number	School	Admission number
Alexandra	60	Mulberry	90
Belmont Infants	58	Muswell Hill	60
Bounds Green	90	North Harringay	60
Bruce Grove	60	Rhodes Avenue	90
Campsbourne	60	Risley Avenue	90
Chestnuts	60	Rokesly Infant	90
Coldfall	90	St Aidan's VC	30
Coleridge	120	Seven Sisters	60
Crowland	60	South Harringay Infant	60
Devonshire Hill	60	Stamford Hill	30 (subject to whether Council's Cabinet will agree to proceed with the proposed amalgamation with Tiverton Primary School)
Earlham	30	Stroud Green	60
Earlsmead	60	Tetherdown	60
Ferry Lane	30	Tiverton	30 (subject to whether Council's Cabinet will agree to proceed with the proposed amalgamation with Stamford Hill Primary School)
Highgate	60	Welbourne	60
Lancasterian	60	West Green	30
Lea Valley	60	Weston Park	30
Lordship Lane	90	The Willow	60

Pan London Co-ordinated Scheme 2021/22

APPLICATIONS

1. Haringey Local Authority will advise home local authorities of their resident pupils on the roll of Haringey's maintained children's centres, nursery schools, primary schools and infant schools who are eligible to apply for a reception or junior place in the forthcoming academic year.
2. Haringey residents can apply online at www.haringey.gov.uk/schooladmissions or alternatively submit a paper application available from the School Admissions Service.
3. Haringey Local Authority will take all reasonable steps to ensure that every parent who has a child who is eligible to apply for a reception or junior place will be signposted to the booklets which will be available online in September 2020.
4. The booklet will also be available to parents who are non-residents, and will include information on how they can access their home local authority's equivalent School Admissions Application Form.
5. The admission authorities within Haringey will not use supplementary information forms except where the information available through the School Admissions Application Form is insufficient for consideration of the application against the published over-subscription criteria. Where supplementary information forms are used by the admissions authorities with Haringey, we will seek to ensure that they only collect information which is required by the published oversubscription criteria, in accordance with paragraph 2.4 of the School Admissions Code 2014.
6. Where supplementary forms are required, they will be available direct from the relevant school. Such forms will advise parents that they must also complete their home local authority's School Admissions Application Form. Haringey's admissions booklet indicates which Haringey schools require supplementary forms to be completed.
7. Where a school in Haringey receives a supplementary information form, it will not be considered a valid application unless the parent/carer has also listed the school on the Haringey School Admissions Application Form.

8. Haringey Local Authority will share the details of each application for a Haringey voluntary-aided school, foundation school, free school or academy with that school. Schools that require a supplementary information form will check that each parent has completed one. If one has not been received the school will make contact with the parent and ask them to complete one. The school will also check that each parent that has completed a supplementary form has also completed a School Admissions Application Form. If any parent has not completed a School Admissions Application Form, the school will share that information with Haringey Local Authority who will then contact the parent and ask them to complete one.
9. Applicants will be able to express a preference for up to six schools within and/or outside Haringey.
10. The order of preference given on the School Admissions Application Form will not be revealed to a school, to comply with paragraph 1.9 of the School Admissions Code 2014. However, where a parent resident in Haringey expresses a preference for schools in the area of another local authority, the order of preference will be revealed to that local authority in order to determine the highest ranked preference in cases where a child is eligible for a place at more than one school.
11. Haringey undertakes to carry out the address verification process set out in its entry in the LIAAG Address Verification Register. This will in all cases include validation of resident applicants against Haringey's maintained children centre, nursery and primary school data and the further investigation of any discrepancy. Where Haringey is not satisfied as to the validity of an address of an applicant whose preference has been sent to a maintaining LA, it will advise the maintaining LA no later than **12 February 2021**.
12. Haringey will confirm the status of any resident child for whom it receives an Admissions Application Form stating s/he is a 'Child Looked After' and will provide evidence to the maintaining LA in respect of a preference for a school in its area by **5 February 2021**.
13. Haringey will advise a maintaining LA of the reason for any preference expressed for a school in its area, in respect of a resident child born outside of the correct age cohort, and will forward any supporting documentation to the maintaining LA by **5 February 2021**.

PROCESSING

14. Applicants resident within Haringey must complete and return the School Admissions Application Form, which will be available online, by **15 January 2021**.
15. Any application forms, changes to preferences or preference order received after **15 January 2021** will be treated as late. This means that such applications will be considered after those applicants who have applied on time.
16. Haringey will only accept late applications and process them as on time if they are late for a good reason and supported by independent written evidence. Upon receipt of the written independent evidence, each case will be decided on its own merits.
17. Where such applications contain preferences for schools in other LAs, Haringey will forward the details to maintaining LAs via the Pan London Register (PLR) as they are

received. Haringey will accept late applications which are considered to be on time within the terms of the home LA's scheme.

18. The latest date for the upload to the PLR of late applications which are considered to be on time within the terms of the home LA's scheme is **12 February 2021**.
19. Where an applicant moves from one participating home LA to another after submitting an on time application under the terms of the former home LA's scheme, the new home LA will accept the application as on time up to **12 February 2021**, on the basis that an on-time application already exists within the Pan-London system.
20. Application data relating to applications for schools in other participating local authorities will be up-loaded to the Pan-London Register (PLR) by **5 February 2021**. Supplementary information provided with the School Admissions Application Form will be sent to maintaining LAs by the same date.
21. Application data relating to Haringey schools from out-of-borough pupils will be received from the Pan London Register on **5 February 2021**.
22. Haringey Local Authority will notify each school within Haringey that is its own admissions authority of every preference that has been made for the school, forwarding to them all relevant details from the School Admissions Application Form from **5 February 2021**.
23. Between **5 February 2021** and **25 February 2021**, voluntary-aided, foundation schools and academies will assess their applications according to their admissions criteria.
24. Haringey will participate in the application data checking exercise scheduled between **12–26 February 2021** in the Pan-London timetable.
25. All preferences for schools within Haringey will be considered by the relevant admission authorities without reference to preference order. Voluntary-aided schools, Academies, Free schools and Foundation schools to provide Haringey LA with an electronic list of their applicants in rank order by **25 February 2021**. When the admission authorities within Haringey have provided a list of applicants in rank order, Haringey Local Authority shall, for each applicant to its schools for whom more than one potential offer is available, make the offer to the highest ranked school.
26. Haringey will upload the highest potential offer available to an applicant for a maintained school or Academy to the PLR by **19 March 2021**. The PLR will transmit the highest potential offer specified by the maintaining LA to the home LA.
27. Haringey will eliminate all but the highest ranked offer where an applicant has more than one potential offer. This will involve exchanges of preference outcomes between the LAs and the PLR which will continue until notification that a steady state has been achieved or until **26 March 2021** if this is sooner.
28. Haringey will not make any additional offers between the end of the iterative process and **16 April 2021** which may impact on an offer being made by another participating LA.
29. Notwithstanding paragraph 28, if an error is identified within the allocation of places at one of Haringey's schools, Haringey will attempt to manually resolve the allocation to correct

the error. Where this impacts on another LA (either as a home or maintaining LA) Haringey will liaise with that LA to attempt to resolve the incorrect offer and any multiple offers which might occur. However, if another LA is unable to resolve a multiple offer, or if the impact is too far reaching, Haringey will accept that the applicant(s) affected might receive a multiple offer.

30. Haringey will participate in the offer data checking exercise scheduled between **29 March – 10 April 2021** in the Pan-London timetable.
31. Haringey will send a file to the e-admissions portal with outcomes for all resident applicants who have applied online no later than **13 April 2021**.

OFFERS

32. Haringey will ensure, so far as is reasonably practical that each resident applicant who cannot be offered a preference expressed on the School Admissions Application Form receives the offer of an alternative school place. The applicant will be offered the nearest community school (or own admitting authority if the governors have agreed to this) to the home address with an available place.
33. Haringey will inform all resident applicants of their highest offer of a school place and, where relevant, the reasons why higher preferences were not offered, whether they were for schools in Haringey or in other participating LAs.
34. Haringey will use the form of notification letter set in this document.
35. Notification of the outcome will be sent on **16 April 2021**.
36. Haringey will provide children centres, nursery and primary schools with destination data of its resident applicants after offer date.
37. Parents who are not offered a place at their preferred schools will be offered the right of appeal.

POST OFFER

38. Parents must accept or decline the offer of a place by **30 April 2021**. If they do not respond by this date the local authority will make every reasonable effort to contact the parent to find out whether or not they wish to accept the place. If the parent fails to respond to the local authority the school place will be withdrawn.
39. Where a parent accepts or declines a place by **30 April 2021**, this information will be passed to the maintaining LA by **7 May 2021**. Where such information is received from applicants after **30 April 2021**, this LA will pass it to the maintaining LA as it is received.
40. Haringey will inform the home LA, where different, of an offer for a maintained school or academy in Haringey which can be made to an applicant resident in the home LA's area, in order that the home LA can offer the place.
41. When acting as a maintaining LA, Haringey and the admission authorities within it will not inform an applicant resident in another LA that a place can be offered.

42. Haringey will offer a place at a maintained school or academy in another LA to an applicant resident in its area, provided that the school is ranked higher on the School Admissions Application Form than any school already offered.
43. Where Haringey is informed by a maintaining LA of an offer which can be made to an applicant resident in Haringey which is ranked lower on the School Admissions Application Form than any school already offered, it will inform the maintaining LA that the offer will not be made.
44. Where Haringey, acting as a home LA, has agreed to a change of preference order for good reason, it must inform any maintaining LA affected by the change.
45. Haringey will inform the home LA, where different, of any change to an applicant's offer status as soon as it occurs.
46. When acting as a maintaining LA, Haringey will accept new applications (including additional preferences) from home LAs for maintained schools and academies in its area.

WAITING LISTS

47. Where a child does not receive an offer of their first preference, his/her name will automatically be placed on the waiting list for each Haringey school for which he/she is eligible that is a higher preference school to the one offered. Parents will be advised that if they want to go on the waiting list for an out borough school they should put this in writing to the Schools Admission Team in Haringey.
48. Parents will be given the opportunity to make applications to Haringey schools to which they did not originally apply.
49. Waiting lists will be kept by all maintained admission authorities in Haringey and coordinated centrally by Haringey as part of the coordination of all admission applications. Academies, voluntary-aided and foundation schools will apply their own admission arrangements. Haringey Local Authority will keep a mirrored waiting list and will offer places on behalf of the governing body. Waiting lists for community schools will be administered centrally by the local authority.
50. Waiting lists for entry to Reception in the academic year 2021/22 will be compiled on **3 May 2021** (after the deadline for acceptance of places) and will be kept in strict criteria order with no differentiation between on-time or late applications.
51. Waiting lists will be maintained and places allocated as they become available, in accordance with each admission authority's published admission and oversubscription criteria.
52. Children will remain on the waiting list until the end of the summer term of the application year unless parents contact the School Admissions Team to extend this further.

Timetable for entry to school in September 2021

15 January 2021	Statutory deadline for receipt of applications
5 February 2021	Deadline for the transfer of application information by the Home LA to the PLR (ADT file)
12 February 2021	Deadline for the upload of late applications considered as on-time to the PLR
12–26 February 2021	Checking of application data
25 February 2021	Voluntary-aided schools, Academies, Free schools and Foundation schools to provide Haringey LA with an electronic list of their applicants in rank order
19 March 2021	Deadline for the transfer of potential offer information from the Maintaining LAs to the PLR (ALT file).
26 March 2021	Final ALT file to PLR
29 March – 10 April 2021	Checking of offer data
13 April 2021	Deadline for on-line ALT file to portal
16 April 2021	eAdmissions offers made/offer letters posted where applicants have made paper applications
30 April 2021	Deadline for receipt of acceptances
7 May 2021	Deadline for transfer of acceptances to maintaining LAs

NOTIFICATION LETTER

16 April 2021

Address

Pupil

Name:

ID No.:

Reception/Junior Transfer 2021 – <pupil name and date of birth>

I am writing to let you know the outcome of your application for a Reception/Junior school place. I am pleased to tell you that we are able to offer your child a place at **XXX**.

It is important that you confirm as soon as possible that you wish to accept the offer of a place at **XXX**. Failure to do so may result in the offer being withdrawn. Please return the enclosed offer response form by **30 April 2021**. **All applicants must respond by returning this form**. You can deliver it to one of Haringey's Customer Services Centres, or send it by post using the address listed below.

The school has been informed and will contact you to provide further information about the arrangements for admission.

If you were not offered your first preference school

I am sorry that it was not possible to offer your child a place at any of the schools listed as a higher preference on your application form. This is because these schools are currently full in your child's year group. If you would like further information about why your child was not offered a place at one of your higher preference schools, please contact the admission authority for that school. Details of how places were offered in Haringey are given at the end of this letter.

Waiting lists

Please note that applications for any school that you listed lower on your application form have been automatically withdrawn.

If you would like XX to be added to any waiting list for a school, please put your request in writing either by email or post to the address above. You can only be considered for a maximum of 6 schools at any time. If we can offer your child a place from a waiting list we will contact you.

Please note that being on a waiting list does not guarantee your child a place at the school and their position on the list could go down as well as up as other applicants join the list.

Your right to appeal

You have a right of appeal under the School Standards & Framework Act 1998 if your child is refused a place at any of the schools you listed on your form.

If you wish to appeal:

- **for a community or voluntary controlled school in Haringey**, please download an appeal form from www.haringey.gov.uk/schooladmissions or contact us to request a form. These schools are listed on pages X to X in the Reception Admissions booklet.
- **for an academy, voluntary aided or free school in Haringey**, please contact the school direct.

These schools are listed on pages X to X in the Reception Admissions booklet.

- **for schools outside Haringey**, please contact the local authority where the school is located (contacts details can be found at www.haringey.gov.uk/schooladmissions and in the Reception Admissions booklet).

Appeal forms must be returned by X for your appeal to be heard before September 2021.

We **strongly recommend** that you accept the place you have been offered as this will ensure that your child has a school place in September. Accepting the place will not influence the outcome of your appeal or your child's position on a waiting list.

If you have any questions about this letter please contact us using the contact details below.

School Admissions Service

Reception/Junior Transfer 2021 - Offer Response Form

Pupil Name

Date of birth:

ID:

Return by: 30 April 2021

Post to: 7th Floor, River Park House, 225 High Road, London, N22 8HQ

Please complete the relevant options below:

● I **accept** the place for my child at XXX.

Please tick: ☐

or

● I **decline** the place for my child at XXX.

Please tick: ☐

I **do not require** the place offered because I already have a place at **another school**, as follows:

Name of School:

I understand that if I decline this offer, the place may be offered to another applicant.

Signed: Date:

Name:

Telephone Number:

Pupil name

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Proposed Admission Criteria for Secondary Transfer 2021

Oversubscription criteria

When the school is oversubscribed, after the admission of pupils with an Education, Health and Care plan or statement of special educational needs naming the school, priority for admission will be given to those children who meet the criteria set out below, in priority order:

1. Children in Care/ Looked After Children

Children who are looked after by a local authority or were previously looked after but immediately after being looked after, became subject to an adoption, child arrangements, or special guardianship order.

A looked after child is a child who is (a) in the care of a local authority, or (b) being provided with accommodation by a local authority in the exercise of their social services functions (see the definition in Section 22(1) of the Children Act 1989).

2. Social Medical

Children who the Authority accepts have an exceptional medical or social need for a place at one specific school. Applications will only be considered under this category if they are supported by a written statement from a doctor, social worker or other relevant independent professional. The information must confirm the exceptional medical or social need and demonstrate how the specified school is the only school that can meet the defined needs of the child.

3. Brother or Sister (sibling)

Children with a brother or sister already attending the school and who will still be attending in years 7-11 on the date of admission.

If a place is obtained for an older child using fraudulent information, there will be no sibling connection available to subsequent children from that family.

4. Children of staff

Children of teaching staff of the school where the member of staff has been employed at the school for two or more years at the time of application and/or children of a member of staff who has been recruited to fill a vacancy for which there is a demonstrable skill shortage.

5. Distance

Children whose home address is closest to the preferred school.

Distance will be measured in a straight line from the Ordnance Survey address point of the child's home to the Ordnance Survey address point of the school, calculated using a computerised mapping system.

Tie breakers

The tie breaker to decide between two applications that cannot otherwise be separated is children whose home address is closest to the school measured in a straight line from the Ordnance Survey address point of the child's home to the Ordnance Survey address point of the school, calculated using a computerised mapping system.

The tiebreak for two or more applications whose home address is exactly the same distance from the school (and who are not from multiple births) will be random allocation using a computerised system.

Multiple births

If only one place is available and the next child to be offered is from a multiple birth, we will ask community schools to go over their published admission number.

Notes

- (i) Home address is defined as the child's only or main residence.
- (ii) A sibling is a full brother or sister, a step/half brother or sister, a foster brother or sister or an adopted brother or sister living at the same address as the child for whom the application is being made.
- (iii) Priority for children of teaching staff will be limited to one place for each form of entry in any year. Exception to this will apply to children of multiple birth or those born in the same academic year. All such applications must be submitted to the local authority and must be accompanied with the relevant paperwork supporting an application on these grounds. The applicant must take sole responsibility to provide such paperwork. Without the provision of the relevant papers, priority will not be given on these grounds.
- (iv) Haringey measures distance in a straight line from the Ordnance Survey address point of the child's home to the Ordnance Survey address point of the school, calculated using a computerised mapping system. Measurements by alternative systems or to other points will not be taken into account in any circumstances. Where applicants have identical distance measurements, priority amongst them will be determined at random using a computerised system.

Proposed Admission Criteria to Hornsey School for Girls for 2021

When the school is oversubscribed, after the admission of pupils with an Education, Health and Care plan or statement of special educational needs naming the school, priority for admission will be given to those children who meet the criteria set out below, in priority order:

1. Children in Care/Looked After Children

Girls who are looked after by a local authority or were previously looked after but immediately after being looked after, became subject to an adoption, child arrangements, or special guardianship order.

A looked after child is a child who is (a) in the care of a local authority, or (b) being provided with accommodation by a local authority in the exercise of their social services functions (see the definition in Section 22(1) of the Children Act 1989).

2. Social Medical

Girls who the Authority accepts have an exceptional medical or social need for a place at one specific school. Applications will only be considered under this category if they are supported by a written statement from a doctor, social worker or other relevant independent professional. The information must confirm the exceptional medical or social need and demonstrate how the specified school is the only school that can meet the defined needs of the child.

3. Siblings

Girls with a sister already attending the school and who will still be attending in years 7-11 on the date of admission. A sibling is a full sister, a step sister, a foster sister or an adopted sister living at the same address as the girl for whom the application is being made.

If a place is obtained for an older child using fraudulent information, there will be no sibling connection available to subsequent children from that family.

4. Children of staff

Girls whose parent is a member of teaching staff of the school where the member of staff has been employed at the school for two or more years at the time of application and/or girls of a member of staff who has been recruited to fill a vacancy for which there is a demonstrable skill shortage.

5. Distance

Girls whose home address is closest to the school.

Distance will be measured in a straight line from the Ordnance Survey address point of the child's home to the Ordnance Survey address point of the school, calculated using a computerised mapping system.

Tie breakers

The tie-breaker to decide between two applications that cannot be separated otherwise for all criteria is children whose home address is closest to the school measured in a straight line from

the Ordnance Survey address point of the child's home to the Ordnance Survey address point of the school, calculated using a computerised mapping system.

The tiebreak for two or more applications that live exactly the same distance from the school (and who are not from multiple births) will be random allocation using a computerised system.

Multiple births

If only one place is available and the next girl to be offered is from a multiple birth, we will ask the school to go over their published admission number.

Notes

- (i) Home address is defined as the child's only or main residence.
- (ii) Priority for children of teaching staff will be limited to one place for each form of entry in any year. Exception to this will apply to children of multiple birth or those born in the same academic year. All such applications must be submitted to the local authority and must be accompanied with the relevant paperwork supporting an application on these grounds. The applicant must take sole responsibility to provide such paperwork. Without the provision of the relevant papers, priority will not be given on these grounds.
- (iii) Haringey measures distance in a straight line from the Ordnance Survey address point of the child's home to the Ordnance Survey address point of the school, calculated using a computerised mapping system. Measurements by alternative systems or to other points will not be taken into account in any circumstances. Where applicants have identical distance measurements, priority amongst them will be determined at random using a computerised system.

Published Admission Number (PAN)

The admission number for Haringey community schools for entry in September 2021 is as follows -

Gladesmore Community School 243 places

Highgate Wood School 243 places

Hornsey School for Girls 162 places

Park View Academy 216 places

APPLICATIONS

1. Haringey Local Authority will advise home local authorities during the Summer Term of Year 5 of their resident pupils on the roll of Haringey's maintained primary schools and whose parents are eligible to make application in the forthcoming academic year.
2. Haringey residents can apply online at www.haringey.gov.uk/schooladmissions or alternatively submit a paper application available from the School Admissions Service.
3. Haringey Local Authority will take all reasonable steps to ensure that every parent who has a child in their last year of primary education within a maintained school, either in Haringey or elsewhere, and who is resident in Haringey can be signposted to a copy of Haringey's booklet which will be available in early September 2020.
4. The booklet will also be available to parents who are non-residents and will include information on how they can access their home local authority's equivalent School Admissions Application Form.
5. The admission authorities within Haringey will not use supplementary information forms except where the information available through the School Admissions Application Form is insufficient for consideration of the application against the published oversubscription criteria. Where supplementary information forms are used by the admission authorities within Haringey, the LA will seek to ensure that they only collect information which is required by the published oversubscription criteria, in accordance with paragraph 2.4 of the School Admissions Code 2014.
6. Where supplementary forms are used, they will be made available directly from the relevant schools. Such forms will advise parents that they must also complete their home local authority's School Admissions Application Form. The Haringey schools' booklet will indicate which Haringey schools require supplementary information forms to be completed.
7. Where a school in Haringey receives a supplementary information form, it will not be considered a valid application unless the parent/carer has also listed the school on their home LA's School Admissions Application Form.
8. Haringey Local Authority will share the details of each application for a Haringey voluntary-aided school, foundation school or academy with that school. Schools that require a supplementary information form will check that each parent has completed one. If one has not been received the school will make contact with the parent and ask them to complete one. The school will also check that each parent that has completed a supplementary form has also completed a School Admissions Application Form. If any parent has not completed a School Admissions Application Form, the school will share that information with Haringey Local Authority who will then contact the parent and ask them to complete one.
9. Applicants will be able to express a preference for six schools located within and/or outside Haringey Local Authority.
10. The order of preference given on the School Admissions Application Form will not be revealed to a school. However, where a parent resident in Haringey expresses a

preference for schools in the area of another local authority, the order of preference will be revealed to that local authority in order to determine the highest preference offer in cases where a child is eligible for a place at more than one school.

11. Haringey undertakes to carry out the address verification process set out in its entry in LIAGG Address Verification Register. This will in all cases include validation of resident applicants against this LA's primary school data and the further investigation of any discrepancy. Additional information will be requested from parents at the time of application and this will be explained in the secondary booklet. Where this LA is not satisfied as to the validity of an address of an applicant whose preference has been sent to a maintaining LA, it will advise the maintaining LA no later than **11 December 2020**.
12. Haringey will confirm the status of any resident child for whom it receives an Application Form stating that s/he is a 'Child in Care' and will provide evidence to the maintaining LA in respect of a preference for a school in its area by **12 November 2020**.
13. Haringey will advise a maintaining LA of the reason for any preference expressed for a school in its area, in respect of a resident child born outside of the correct age cohort, and will forward any supporting documentation to the maintaining LA by **12 November 2020**.

PROCESSING

14. Applicants resident within Haringey must complete and return the School Admissions Application Form, which will be available on-line, by **31 October 2020**. However, Haringey LA encourages applicants to submit their application by **23 October 2020** to allow sufficient time to process and check all applications before the mandatory date when data must be sent to the Pan London Register (PLR).
15. Any application forms, changes to preferences or preference order received after **31 October 2020** will be treated as late. This means that such applications will be considered after those applicants who have applied on time.
16. Haringey will accept late applications and process them as on time only if they are late for a good reason and supported by written independent evidence. Upon receipt of the written independent evidence, each case will be decided on its own merits.
17. Where such applications contain preferences for schools in other LAs, Haringey will forward the details to maintaining LAs via the Pan-London Register (PLR) as they are received. Haringey will accept late applications which are considered to be on time within the terms of the home LA's scheme.
18. The latest date for the upload to the PLR of late applications which are considered to be on-time within the terms of the home LA's scheme is **11 December 2020**.
19. Where an applicant moves from one participating home LA to another after submitting an on-time application under the terms of the former home LA's scheme, the new home LA will accept the application as on-time up to **10 December 2020**, on the basis that an on-time application already exists within the Pan-London system.
20. Application data relating to applications for schools in other participating local authorities will be up-loaded to the Pan-London Register (PLR) by **12 November 2020**.

Supplementary information provided with the School Admissions Application Form will be sent to Haringey voluntary-aided schools/maintaining local authorities by the same date.

21. Application data relating to Haringey schools from out-of-borough pupils will be received from the Pan London Register on **12 November 2020**.
22. Haringey Local Authority will notify each school within Haringey that is its own admission authority of every preference that has been made for the school, forwarding to them all relevant details from the School Admissions Application Form by **6 December 2020**.
23. Between **6 December 2020** and **6 January 2021**, voluntary-aided, foundation schools and Academies will assess their applications according to their admissions criteria.
24. Haringey will participate in the application data checking exercise scheduled between **14 December 2020 - 4 January 2021** in the Pan-London timetable.
25. All preferences for schools within Haringey will be considered by the relevant admission authorities without reference to preference order. Voluntary-aided schools, Academies, Free schools and Foundation schools to provide Haringey LA with an electronic list of their applicants in rank order by **6 January 2021**. When the admission authorities within Haringey have provided a list of applicants in rank order, Haringey Local Authority shall, for each applicant to its schools for whom more than one potential offer is available, make the offer to the highest ranked school.
26. Haringey Local Authority will send the first ALT file to the Pan-London Register (PLR) giving offer details for their school by **29 January 2021**. The PLR will transmit the highest potential offer specified by the maintaining LA to the Home LA.
27. Haringey will eliminate all but the highest ranked offer where an applicant has more than one potential offer. This will involve exchanges of preference outcomes between the LAS (Local Admissions System) and the PLR which will continue until notification that a steady state has been achieved or until **12 February 2021** if this is sooner.
28. Haringey will not make an additional offer between the end of the iterative process and **1 March 2021** which may impact on an offer being made by another participating LA.
29. Notwithstanding paragraph 28 if an error is identified within the allocation of places at one of our schools, Haringey LA will attempt to manually resolve the allocation to correct the error. Where this impacts on another LA (either as a home or maintaining LA) Haringey LA will liaise with that LA to attempt to resolve the incorrect offer and any multiple offers which might occur. However, if another LA is unable to resolve a multiple offer, or if the impact is too far reaching, Haringey will accept that the applicant(s) affected might receive a multiple offer.
30. Haringey will participate in the offer data checking exercise scheduled between **15 - 22 February 2021**.
31. Haringey will send a file to the E-Admissions portal with outcomes for all resident applicants who have applied online no later than **25 February 2020**.

OFFERS

32. Haringey will ensure, so far as is reasonably practical, that each resident applicant who cannot be offered a preference expressed on the School Admissions Application Form receives the offer of an alternative school place. The applicant will be offered a place at the nearest community school (or own admitting authority school if the governors have agreed to this) to the home address with an available place.
33. Haringey will inform all resident applicants of their highest offer of a school place and, where relevant, the reasons why higher preferences were not offered, whether they were for schools in the Home LA or in other participating LAs.
34. Haringey will use the form of Notification Letter set out in this document.
35. Notification of the outcome will be sent to parents on **1 March 2021**.
36. Details of the pupils to be offered will be made available to each Haringey primary school by **1 March 2021**.
37. Parents who are not offered a place at their preferred schools will be offered the right of appeal.

POST OFFER

38. Parents must accept or decline the offer of a place by **15 March 2021**. If they do not respond by this date the local authority will make every reasonable effort to contact the parent to find out whether or not they wish to accept the place. If the parent fails to respond to the local authority the school place will be withdrawn.
39. Where a parent accepts or declines a place by **15 March 2021** this information will be passed to the maintaining LA by **22 March 2021**. Where such information is received from applicants after **15 March 2021**, this LA will pass it to the maintaining LA as it is received.
40. Where a place becomes available in an oversubscribed maintained school or academy in Haringey, it will be offered from a waiting list ordered in accordance with paragraph 2.14 of the School Admissions Code 2014.
41. Haringey will inform the home LA, where different, of an offer for a maintained school or Academy in Haringey which can be made to an applicant resident in the home LA's area, in order that the home LA can offer the place.
42. When acting as a maintaining LA, Haringey LA and the admission authorities within it will not inform an applicant resident in another LA that a place can be offered.
43. Haringey will offer a place at a maintained school or Academy in another LA to an applicant resident in its area, provided that the school is ranked higher on the School Admissions Application Form than any school already offered.
44. Where Haringey is informed by a maintaining LA of an offer which can be made to an applicant resident in Haringey which is ranked lower on the School Admissions Application Form than any school already offered, it will inform the maintaining LA that the offer will not be made.

45. Where Haringey, acting as a home LA, has agreed to a change of preference order for good reason, it must inform any maintaining LA affected by the change.
46. Haringey will inform the home LA, where different, of any change to an applicant's offer status as soon as it occurs.
47. Haringey will accept new applications (including additional preferences) from home LAs for maintained schools and Academies in its area.

WAITING LISTS

48. Where a child does not receive an offer of their first preference, his/her name will automatically be placed on the waiting list for each Haringey school for which he/she is eligible, that is a higher preference school to the one that has been offered. Parents will be advised that if they want to go on the waiting list for an out-of-borough school, that they must put this in writing to the School Admissions Service in Haringey.
49. Parents will be given the opportunity to make applications to Haringey schools to which they did not originally apply.
50. Waiting lists will be kept by all maintained admission authorities in Haringey and coordinated centrally by this local authority as part of the coordination of all admission applications. Academies, voluntary-aided and foundation schools will apply their own admission arrangements. Haringey local authority will keep a mirrored waiting list and will offer places on behalf of the governing body. Waiting lists for community schools will be administered centrally by the local authority.
51. Waiting lists for entry to Year 7 in September 2021 will be compiled on **19 March 2021** (after the deadline for acceptance of places) and will be kept in strict criteria order with no differentiation between on-time or late applications.
52. Waiting lists will be maintained and places allocated, as they become available, in accordance with each admission authority's published admission and oversubscription criteria.
53. Children will remain on the waiting list until the end of the Summer Term of the application year, unless parents contact the School Admissions Team to extend this further.

Timetable for entry to school in September 2020

23 October 2020	Recommended closing date for receipt of the School Admission Application Form
31 October 2020	Statutory deadline for return of application to the Home LA
12 November 2020	Deadline for the transfer of application information by the Home LA to the PLR and supplementary information to Haringey VA schools/maintaining local authorities
6 December 2020 – 6 January 2021	Voluntary-aided schools and Academies will order their applications according to their admissions criteria

11 December 2020	Deadline for the upload of applications that are late but are considered to be on-time, to the PLR
14 December 2020 - 4 January 2021	Pan-London data checking exercise of pupil applications exchanged via the PLR
6 January 2021	Voluntary-aided schools, Academies, Free schools and Foundation schools to provide Haringey LA with an electronic list of their applicants in rank order
29 January 2021	Deadline for the transfer of highest potential offer information from the Maintaining LAs to the PLR
12 February 2021	Final ALT file to the PLR
15 - 22 February 2021	Pan-London data checking exercise of pupil offer data
23 February 2021	Deadline for on-line ALT file to portal
1 March 2021	eAdmissions offers made/offer letters posted where applicants have made paper applications
15 March 2021	Date by which parents accept or decline offers
22 March 2021	Date by which LA will pass information to schools within Haringey (or for out-of-borough schools, to the maintaining LA) on parents who have accepted or declined a place.

NOTIFICATION LETTER

1 March 2021

Address

Pupil
Name:

ID No.:

Secondary Transfer 2021 – pupil name and date of birth

I am writing to let you know the outcome of your application for a secondary school place. I am pleased to tell you that we are able to offer your child a place at **XXX**.

It is important that you confirm as soon as possible that you wish to accept the offer of a place at **XXX**. Failure to do so may result in the offer being withdrawn. Please return the enclosed offer response form by **1 March 2021**. **All applicants must respond by returning this form**. You can deliver it to one of Haringey's Customer Services Centres, or send it by post using the address listed below.

The school has been informed and will contact you to provide further information about the arrangements for admission.

If you were not offered your first preference school

I am sorry that it was not possible to offer your child a place at any of the schools listed as a higher preference on your application form. This is because these schools are currently full in your child's year group. If you would like further information about why your child was not offered a place at one of your higher preference schools, please contact the admission authority for that school. Details of how places were offered in Haringey are given at the end of this letter.

Waiting lists

Please note that applications for any school that you listed lower on your application form have been automatically withdrawn.

If you would like to be added to any waiting list for a school, please put your request in writing either by email or post to the address above. You can only be considered for a maximum of 6 schools at any time. If we can offer your child a place from a waiting list we will contact you.

Please note that being on a waiting list does not guarantee your child a place at the school and their position on the list could go down as well as up as other applicants join the list.

Your right to appeal

You have a right of appeal under the School Standards & Framework Act 1998 if your child is refused a place at any of the schools you listed on your form.

If you wish to appeal:

- **for Alexandra Park, Heartlands High or a community school in Haringey**, please download an appeal form from www.haringey.gov.uk/schooladmissions or contact us to request a form. These schools are listed on pages X to X in the Secondary Admissions booklet.
- **for Fortismere, Harris Academy Tottenham, Greig City Academy, St Thomas More Catholic School, Woodside High or Tottenham UTC**, please contact the school direct. These schools are listed on pages X to X in the Secondary Admissions booklet.
- **for schools outside Haringey**, please contact the local authority where the school is located (contacts details can be found at www.haringey.gov.uk/schooladmissions and in the Secondary Admissions booklet).

Appeal forms must be returned by **<appeal deadline>** for your appeal to be heard before September 2021.

We **strongly recommend** that you accept the place you have been offered as this will ensure that your child has a school place in September. Accepting the place will not influence the outcome of your appeal or your child's position on a waiting list.

If you have any questions about this letter please contact us using the contact details below.

School Admissions Service

Secondary Transfer 2021 - Offer Response Form

Pupil name

Date of birth:

ID:

Return by: 1 March 2021

Post to: 7th Floor, River Park House, 225 High Road, London, N22 8HQ

Please complete the relevant options below:

● I **accept** the place for my child at XXX

Please tick: ☐

or

● I **decline** the place for my child at XXX

Please tick: ☐

I **do not require** the place offered because I already have a place at **another school**, as follows:

Name of School:

I understand that if I decline this offer, the place may be offered to another applicant.

Signed: Date:

Name:

Telephone Number:

Pupil Name

Proposed Scheme for In-Year Admissions 2020/21

OVERSUBSCRIPTION CRITERIA

Primary, Infant and Junior community and voluntary controlled (VC) schools

The criteria set out in Appendix 2 will be applied.

Secondary community schools

The criteria set out in Appendix 3 will be applied.

APPLICATIONS

1. Applications from Haringey and non-Haringey residents for schools in Haringey must be made directly to the Haringey Schools Admission Service.
2. The in-year e-form is available to complete on the Haringey website or a paper application is available on request from the Haringey School Admissions Service.
3. Haringey residents applying for places at maintained schools and academies **outside** Haringey will need to apply directly to the LA (local authority) in whose area the school is situated.
4. The admission authorities within Haringey will not use supplementary forms except where the information available through the School Admissions Application Form is insufficient for consideration of the application against their published oversubscription criteria.
5. Where supplementary forms are used, they will be available from the school concerned. Haringey's admission booklets and website will indicate which schools require supplementary forms to be completed and from where they can be obtained.
6. Where an admission authority in Haringey receives a supplementary form, it will not consider it to be a valid application until such time as the parent/carer has listed the school on their home LA's School Admissions Application Form.
7. Where only the School Admissions Application Form is received, schools **MUST** rank the application according to the information available to them.
8. Applicants will be able to express a preference for a maximum of six schools within Haringey.
9. The order of preference given on the In-Year School Admissions Application Form will not be shared with any school.
10. The Haringey Schools Admission Service will carry out address verification for each application made to a maintained school or academy in Haringey. Where Haringey is not satisfied as to the validity of an address of an applicant it will advise the admission authority schools.

11. Haringey will check the status of any applicant who is a 'looked after or was previously looked after but immediately after being looked after became subject to an adoption, child arrangements or special guardianship order.'

PROCESSING

12. Parents/carers applying for schools in Haringey must complete the in-year e-form available on the Haringey website or request a paper application form available from the Haringey School Admissions Service.
13. Where an application is not fully completed, Haringey will not treat the application as valid until all information is received.
14. In the event that a Haringey resident applies to a non-Haringey school, Haringey will write to the parent/carer advising them to apply directly to the LA in whose area the school is situated.
15. If a pupil is currently on roll at a school in Haringey or a school in a neighbouring borough, the Admissions Service will advise the parent/carer to discuss the transfer with the Headteacher or senior Teacher at the school.

OFFERS

16. If a school has a vacancy, it is expected that an offer of a place will be made to the child entitled to that place in accordance with the published oversubscription criteria. The Local Authority will offer places at community schools and will also make offers on behalf of own admission authority schools should they so wish.
17. Haringey will write to parents who have not been offered a place at any of their preferred schools giving reasons and informing them of their right of appeal to an independent panel in accordance with the School Standards and Framework Act 1998.
18. Haringey will notify the Home LA of the outcome of applications for their residents.
19. When a child has been offered a place at a higher preference school, the lower ranking preferences will be withdrawn.
20. When a child has been offered a place at a lower preference school, the higher preferences will also be withdrawn unless the parent indicates otherwise. Only where a parent/carer has expressly set out that they wish to be put on the waiting list of those schools which are a higher preference will this be done.
21. Where a home applicant who is out of school cannot be offered a place at one of their named preferences, Haringey will offer the nearest community (or own admitting authority if the governors have agreed to this) school to the home address with an available place.
22. Where it is known that a non-Haringey resident is out of school and cannot be offered a place at one of their named preferences, Haringey will notify the home LA who will be responsible for identifying a school place for the child.

POST OFFER

23. Parent/carers will be expected to accept or decline the offer of a place as soon as possible. Parents must be given a reasonable amount of time to consider the offer (10 school days).
24. Where a parent does not respond within this timeframe Haringey will make every reasonable effort to contact the parent to find out whether or not they wish to accept the place. Where the parent fails to respond the offer of a place will be withdrawn.
25. Haringey will notify the home LA of any appeals that are upheld for Haringey schools.
26. Children will remain on the waiting list until the end of the academic year in which the application was made and Haringey will write to all parent/carers asking them to complete a new application form if they wish to stay on the waiting list(s) beyond this timeframe.

HARINGEY SCHOOLS

27. The Haringey School Admissions Service will require a list of every child on roll in every year group in all the relevant Haringey schools.
28. Schools will be required to provide a weekly roll update so that it is clear on a week by week basis where there are vacancies across all schools and year groups.
29. When a child leaves a Haringey school, the name of the child and the child's future educational provision must be communicated to the School Admissions Service.

TRANSFERRING BETWEEN SCHOOLS

30. Parent/carers wishing to move their children between local schools will be encouraged to discuss their reasons with their current school.
31. Parent/carers need to be aware of and consider the potential impact that any move might have on the education and wellbeing of their child(ren).
32. Parent/carers moving address will also be advised to think carefully before requesting to move their child(ren) to another school.
33. Where a parent/carer insists on a transfer, it would be unlawful for an admission authority to refuse a place if a vacancy exists.

FRAUDULENT APPLICATIONS

34. An offer on the grounds of proximity is conditional on the child being solely or mainly resident at the address provided at the time of application. A business address, a childminder's address, or any other address other than the child's home will not be accepted. Proof of address will be sought and may be subject to further investigation.
35. Haringey Council will make every effort to prevent fraudulent applications. Haringey will carry out random checks on a number of applications and reserve the right to carry out home visits to the address provided on the application form.

36. A school place obtained using a false address will be withdrawn and given to the child who was entitled to that place. If a place is obtained for an older child using fraudulent information, there will be no sibling connection available to subsequent children from that family.

In-Year Fair Access Protocol for Haringey Schools

Introduction

1. The School Admissions Code requires local authorities to have in place a fair access protocol which all local schools and Academies must adhere to.
2. Its aims are to:
 - acknowledge the real needs of vulnerable young people who are not on the roll of a school and to ensure that an appropriate placement is identified quickly and pupils are on roll within 15 days of the panel
 - seek to find an alternative placement or support for those on roll of a school where it can be demonstrated that they are at risk of permanent exclusion
 - fairly share the admission of vulnerable students across all schools and Academies (where the panel agree that another mainstream school place should be identified)
 - arrange such admissions openly through a process which has the confidence of all
 - record the progress and successes of the young people placed through this panel

This protocols reflects the LA's responsibility for safeguarding and promoting the welfare of children and young people as well as educational attainment

3. It is essential to the success of IYFAP that all Head teachers and governing bodies agree to the aims, principles and procedures and give their fullest support.
4. All schools recognise their collective responsibility for all pupils and accountability for some and will work collaboratively to manage pupils with challenging behaviour, involving multi-agency support, accessed where appropriate. All members will work together to secure commitment to the inclusion agenda and to reduce exclusions from schools.

Students within the scope of this scheme

5. The admission to school of the following students falls within the scope of this scheme:
 - children from the criminal justice system or Pupil Referral Units who need to be reintegrated into mainstream education;
 - children who have been out of education for two months or more;
 - children of Gypsies, Roma, Travellers, refugees and asylum seekers;

- children who are homeless;
 - children with unsupportive family backgrounds for whom a place has not been sought;
 - children who are carers;
 - children with special educational needs, disabilities or medical conditions (but without a statement or education, health and care plan);
 - those permanently excluded;
 - where children who are out of school where there is evidence that they were at risk of exclusion prior to leaving their last school;
 - children removed from school and unable to find a place after a number of fixed term exclusions;
 - pupils ready for reintegration from the Pupil Support Centre or secure units;
 - those who are at risk of permanent exclusion.
 - children in year 6 who are out of school following the October school census.
6. The Fair Access Panel will also administer the process for managed moves.
 7. Schools must inform the School Admissions Service of any pupil who they are going to refer for a managed move. Subject to paragraph 8, the receiving school will be agreed and recorded at the meeting and progress reports be taken to every panel until the pupil is on roll at the new school or it is determined that they should remain at their original school.
 8. Schools may refer a child at risk of permanent exclusion for the panel to consider a managed move. However, if it is agreed that a managed move is in the best interests of the young person, the placement must be agreed between the substantive and receiving school and the family. This may happen outside the panel meeting. In every case, the Admissions Service must be informed,
 9. There are dedicated arrangements for children with statements of Special Educational Needs (SEN) or Education, Health and Care plans and this protocol does not override those arrangements. However, it has been agreed that pupils who are placed through those arrangements will be noted by the IYFAP panel (see later section).

Composition and frequency of the panel

Secondary

10. A panel, consisting of a minimum of 3 secondary Head teachers (or their designated representative), will meet once a month (or as necessary) to ensure

prompt and fair allocation of young people to schools. Heads will be notified of their designated meetings at the beginning of the academic year,

11. The Head of Education Services or another designated LA Officer will chair the panel.
12. In the event that the placement decision is not unanimous, the designated Head teachers will decide.
13. Where a young person is known to a particular service or agency, an officer with knowledge of that young person will be invited to the panel, or a short written statement may be submitted.
14. The membership of the panel can include as necessary, a representative of children's social care, educational psychology service, youth offending service, children missing education, children in care, the police and any other relevant professional supporting a case.

Primary

15. A panel, consisting of no less than three primary Head teachers (or their designated representative), will meet once a half term, (or as necessary) to ensure prompt and fair allocation of young people to schools.
16. The Head of Education Services or another designated LA Officer will chair the panel.
17. Where a young person is known to a particular service or agency, an officer with knowledge of that young person will be invited to the panel, or a short written statement may be submitted.

The decision-making process

18. Cases will be brought to the panel by the Haringey Admissions Service which will be the point of referral. The cases must be submitted under one of the categories given in paragraph 5 above and the child must be without a school place.
19. The Panel will be administered by the Haringey Admissions Service which will provide data for the current and previous school year (figures to be based on actual figures where IYFAP pupils have been admitted).
20. The following data will be provided at each panel:
 - The number of pupils on roll at each school in each year group
 - The number of vacancies at each school in each year group
 - The number of pupils that have been admitted to each school in each year group through the 'normal' in year admissions process since the last panel

- The number of pupils that have been admitted to each school in each year group through the Fair Access admissions process since the last panel
 - The total number of pupils that have been admitted to each school in each year group through the Fair Access admissions process in the last academic year and the number of schools or Academies (if any) that have failed to admit
 - Background/ pupil history/ information, where available and where consent has been confirmed
 - The number of students with statements of Special Educational Need allocated over number through the SEN procedures.
21. The placement panel for Children in care will continue to determine the most appropriate placement for each young person and their case will be presented for the panel to ratify. In order to ensure that CIC are admitted to school quickly, they will be placed before the panel and it will not be possible for these cases to be brought back to the panel for reconsideration.
22. When making the decision as to appropriate school placement for the child, the panel will take into account:
- preferences made and views of parents/carers and the view of the pupil (including religious affiliation)
 - the admissions criteria
 - the published admission number and number of forms, of entry so placements can be made proportional to the number of forms of entry
 - the number of students admitted through IYFAP in the previous and current academic year
 - the needs of the student, where this is known
 - any capacity/capability reasons why the school may not be able to respond to the needs of the student
 - the individual context of a school in relation to recently excluded students
 - whether the applicant has previously attended a Haringey school.
 - it will be the presumption that wherever possible pupils will return to a school if they have previously been on roll there.
23. In addition to the factors above each child will be allocated a set number of points under the below system, based on the likely complexity of support which the admitting school will need to put in place. The combined points of the children admitted to each school via IYFAP will be monitored, and when

considering the equitable allocation of children the panel will take into account the proportion of complex cases which each school has already admitted.

IYFAP Points System	
Weighting	Case Factors
3 points	Permanent exclusion and/or Youth Offending Service involvement
2 points	More than one fixed term exclusion, a managed move, or other significant concerns (as agreed by panel)
1 points	All other allocations

24. In cases where a child does not return to their previous Haringey school, that school will have the value of one child debited from their comparative IYFAP statistics, to reflect the loss of that child from the school's roll.
- This debit will apply regardless of whether the child was originally admitted to that school via the IYFAP protocol.
 - In cases where the child is being re-integrated into mainstream school from an alternative provision, and the child was previously permanently excluded or it is otherwise considered to be in the best interests of the child not to return to their previous school, this debit will not be applied.
 - In cases where the child previously attended more than one Haringey school the debit will be applied solely to the school which the child most recently attended.
25. **Note:** Where a school has admitted pupils above its admission number in error, these additional pupils will not count and cannot be off-set against IYFAP referrals.
26. Where an alternative educational placement is determined most suitable to meet the needs of a young person, this provision will be identified in principle by the Inclusion Service, following assessment, and ratified by the panel.
27. Decisions will be reached by consensus, whenever possible, with the chair mandated to take appropriate action where this has not proved possible.

Implementation of the decisions

28. Decisions regarding placement of students under the Fair Access protocol will be made by the panel, and will be final.
29. *Admission must take place within **15** school days of the school receiving notification of the decision.*
30. In exceptional circumstances, the allocated school may request that the panel reconsider their decision at the next meeting. This will only be possible where the school has prior knowledge of the specific young person which was not known to the panel at the time of decision, which makes the placement inappropriate. This request must be made in writing to the Chair within **5** school

days of the school receiving notification of the decision. The formal offer letter will be sent on the 6th day.

31. The Department for Education recognises that admission of a young person through the Fair Access Panel could potentially take the school above the planned admission number for that year group.
32. It is recognised that there is usually little available information about the young people who are being admitted in-year to school. The Admissions Service will try to acquire as much educational information as practical to accompany in-year admissions to assist smooth integration to the school.

Risk assessments

33. Risk assessments will be undertaken as necessary by the referring body.

Relationship with appeals

34. Where young people are admitted to a school above the planned admission number in any year group under the protocol, this should not prejudice the provision of efficient education or the efficient use of resources of the school.
35. Appeal panels will be made aware of the conditions of the scheme, and that the admission of an additional student under this scheme is different from a school voluntarily exceeding its admission limit. Panels will also be made aware that any decision made to allow appeals will place further pressure on the school's resources.
36. A school placement made through IYFAP shall not remove a parent/carer's right to appeal for a school place elsewhere.

Monitoring the operation of the Protocol

37. The Admissions Service will undertake scheduled checks and monitor admission dates and pupil days.
38. The anonymised details of all decisions will be made available to the Director and Lead Member to demonstrate that the Protocol is being effective.
39. This will include any school or Academy that has not taken a pupil on roll within 15 days of the decision being notified.
40. Details of any school or Academy who has not taken a pupil on roll within 15 days of the decision will also be available at the next IYFAP meeting.
41. On the 16th day the Head of Education Services will contact in writing the Headteacher of any school or Academy that has failed to admit within the agreed timeframe to request an on roll date.
42. If the school or Academy fails to provide an on roll date, within agreed timescales, then the direction process will apply as set out in the School Admissions Code and in accordance to the Department for Education advice: "Fair Access Protocols: Principles and Process".

43. The protocol will be reviewed on an annual basis by the Local Authority, in conjunction with Head teachers/ principals, in order to assess its effectiveness in ensuring that unplaced children are being allocated places at schools/ academies or in alternative educational provision on an equitable basis.

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Proposed Admission Criteria for Sixth Form 2021

Highgate Wood School

Maximum number of students to be admitted from outside the school = 30%

All students will be invited to an informal discussion about their subject choice. The general entry requirements are as follows:

A Level

At least five GCSE passes at 9 – 5, with specific requirements for particular subjects based upon the national statistical guidance for successful outcomes. We consider ourselves to be an open access Sixth Form and so the criteria are matched to what is required to ensure positive outcomes. Full details for different subjects are available on the website.

Admission priorities

Where the number of eligible external applicants for a course of study exceeds the places available then admission will be determined in accordance with the following priority of admission criteria:

1. Students who have a statement of Special Educational Needs or Education Health and Care Plan specifically naming the school.
2. Students who are looked after by a local authority or were previously looked after but immediately after being looked after, became subject to an adoption, child arrangements or special guardianship order.

A looked after child is a child who is (a) in the care of a local authority, or (b) being provided with accommodation by a local authority in the exercise of their social services functions (see the definition in Section 22 (1) of the Children Act 1989).

3. Students who will have a sibling attending the school at the point of admission. This category includes foster brothers and sisters, half brothers and half-sisters, stepbrothers and stepsisters or adopted brothers and sisters. They must also be living at the same address as the applicant.
4. Students whose home address (i.e. their only or main residence) is closest to the school.

Distance will be measured in a straight line from the Ordnance Survey address point of the student's home to the Ordnance Survey address point of the school , calculated using a computerised mapping system.

Haringey Sixth Form College

Haringey Sixth Form College is a 16-19 Academy and as such it has an Admissions Policy which has been directly agreed with the Department for Education (DfE).

Different types of courses have different entry requirements. The college will provide courses at Entry to Level 3 and will be fully inclusive. The total number of students to be admitted in September 2019 = 1,084

To study A levels

Students must have a minimum of 5 GCSEs at grades 9-5 which must include grade 5 in English and/or Maths. Some subjects have particular entry requirements such as a grade 6 in English and/or Maths or in the subject to be studied.

Level 3 Vocational programmes

BTEC Level 3 students will need to have 4-5 GCSEs at Grade 9-4 or an equivalent Level 2 qualification such as a BTEC First at Merit or Distinction. GCSE English and/or Maths at grade 4 or above is also required.

Level 2 programmes

BTEC/UAL Level 2 students will usually need to have 3 or more GCSE passes at Grade 3 or above.

Level 1 programmes

BTEC Introductory Diploma students will need to have GCSEs at Grade 3-1 or an appropriate level of English or an equivalent qualification and have an interest in the chosen vocational area.

Entry or Pre –Entry level programmes

Students do not need any formal qualifications but do need a personal commitment to further study in the area.

GSCE English and Maths

Please note: In line with Government Policy from September 2013, all students who have not achieved a Grade C (or grade 4) in GCSE English and/or Maths by the end of their Secondary Education, are required to continue studying these subjects Post 16 until they achieve this minimum grade. This is therefore a requirement for students applying to study at Haringey Sixth Form College

Priority rules

The closing date for applications will be the last day of the spring term. Haringey Sixth Form College will normally be able to offer places to all applicants provided they meet the minimum entry requirements for the course applied for, and equal priority will be given to all applications received by this date.

All applications received after the last day of the spring term will then normally be considered purely on a 'first-come-first-served' basis.

EQUALITY IMPACT ASSESSMENT

“The **Equality Act 2010** places a ‘**General Duty**’ on all public bodies to have ‘**due regard**’ to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited by or under the Act
- Advance equality of opportunity between persons who share a ‘relevant protected characteristic’ and persons who do not share it
- Foster good relations between persons who share a ‘relevant protected characteristic’ and persons who do not share it

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	Determination of the Council’s school admission arrangements – Consultation
Service area	Schools and Learning
Officer completing assessment	Nick Shasha
Equalities/ HR Advisor	Alisha Muhmood
Cabinet meeting date (if applicable)	12 November 2019
Director/Assistant Director	Eveleen Riordan

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*

This Equality Impact Assessment (EqIA) accompanies the Cabinet report

Determination of the Council's School Admission Arrangements for the academic year 2021/22 which recommends Cabinet to:

- agree to consult on the proposed admission arrangements, including the proposed in-year admissions scheme for the academic year 2021/22;
- agree to consult on the proposed IYFAP which, if agreed at Cabinet in February 2020, would be come into force from 1 March 2020;
- agree that the co-ordinated scheme for the admission of children to maintained primary and secondary schools as set out in Appendices 2 and 3 of this report can be published on the Haringey website on 1 January 2020;
- note that consultation on the proposed admission arrangements is scheduled to take place between **26 November 2019 and 7 January 2020**;
- note that following the consultation, a report will be prepared summarising the representations received from the consultation and a decision on the final admission arrangements and the In-Year Fair Access Protocol will be taken by Cabinet in February 2020.

Key stakeholders are parents, carers, staff, children and young adults educated in Haringey community schools. In addition, the same set of stakeholders across the 6 London boroughs neighbouring Haringey.

To ensure as wide a consultation as possible we intend to provide details of the proposed admission arrangements in the following ways:

- through the Schools Bulletin which is distributed to the headteacher and chair of governors of every school in the borough
- to all children's centres in the borough
- to all registered nurseries and child minders and any other early years providers
- on the Council's online primary and secondary admissions page
- via information in all libraries across the borough
- to all councillors
- to both MPs with constituencies in Haringey
- to the diocesan authorities
- to neighbouring authorities
- other groups, bodies, parents and carers as appropriate

An Equalities Impact Assessment (EqIA) will form an important part of the consultation and will seek to ascertain whether the proposed Admission Arrangements could have an impact on protected groups and whether there are steps that can and/or should be taken to mitigate against such an impact.

The Local Authority has a duty to put in place admission arrangements that comply with the mandatory provisions set out in the School Admissions Code 2014. These consist of Admissions Criteria and a Coordinated scheme and aim to provide a clear admissions system and oversubscription criteria which are transparent to those parents applying for a school place.

The Council is the admissions authority for community and voluntary controlled (VC) schools within the borough and therefore is responsible for determining the admission arrangements for these schools. Academies, foundation schools and voluntary aided schools are their own admissions authority; they must consult on and then determine their own admissions arrangements. The Council has a statutory duty to monitor the arrangements determined by own admitting authority schools to ensure compliance with the School Admissions Code. The Council is the coordinating authority for all schools in the Borough (except independent fee-paying schools) and will send out school place offer letters to all Haringey residents where a school place has been applied for in any given year.

The school admissions framework is intended to ensure that the school admissions system is fair to all children regardless of race, ethnicity, gender or ability.

“In drawing up their admission arrangements, admission authorities **must** ensure that the practices and the criteria used to decide the allocation of school places are fair, clear and objective. Parents should be able to look at a set of arrangements and understand easily how places for that school will be allocated” page 7, para 3 - School Admissions Code 2014.

The Code provides admission authorities with some flexibility to determine and implement their own admission arrangements through local consultation, in order to meet circumstances in their area. However, the purpose of the framework is to aim to ensure that unlawful and unfair arrangements are not adopted and that the needs of all children are met.

As in all boroughs, some schools are more popular than others and inevitably some parents will not secure a place at their preferred school. However, the Local Authority has ensured that the proposed Haringey Admission arrangements 2021/22 are compliant with all areas of the Admissions Code, are equitable and transparent and include measures to actively promote fairness.

Proposed Admission Criteria

The proposed admission criteria for 2017 vary slightly according to the type of provision (nursery¹, primary, secondary etc) they apply to – the criteria for all these settings can be

¹ In the case of nurseries, the Authority is responsible for admissions but these are managed by schools with nurseries and nursery centres.

viewed in appendix 1 through to appendix 3. However the main principles for Haringey community and VC schools are set out below:

Statement of Special Education Needs - When the school is oversubscribed, after the admission of pupils with an Education, Health and Care plan or statement of special educational needs naming the school, priority for admission will be given to those children who meet the criteria set out below, in priority order:

If the number of applicants without statements of educational needs/ECHP naming the school is higher than the number of places available, the following rules are applied, in the order of priority to decide who will be offered a place:

1. Children in Care/ Looked After Children

Children who are looked after by a local authority or were previously looked after but immediately after being looked after, became subject to an adoption, child arrangements, or special guardianship order.

A looked after child is a child who is (a) in the care of a local authority, or (b) being provided with accommodation by a local authority in the exercise of their social services functions (see the definition in Section 22(1) of the Children Act 1989).

2. Social Medical

Children who the Authority accepts have an exceptional medical or social need for a place at one specific school. Applications will only be considered under this category if they are supported by a written statement from a doctor, social worker or other relevant independent professional. The information must confirm the exceptional medical or social need and demonstrate how the specified school is the only school that can meet the defined needs of the child.

3. Brother or Sister (sibling)

Children with a brother or sister already attending the school and who will still be attending in years 7-11 on the date of admission.

If a place is obtained for an older child using fraudulent information, there will be no sibling connection available to subsequent children from that family.

4. Children of staff

Children of teaching staff of the school where the member of staff has been employed at the school for two or more years at the time of application and/or children of a member of staff who has been recruited to fill a vacancy for which there is a demonstrable skill shortage.

5. Distance

Children whose home address is closest to the preferred school.

Distance will be measured in a straight line from the Ordnance Survey address point of the child's home to the Ordnance Survey address point of the school, calculated using a computerised mapping system.

Proposed Pan London Co-ordinated Scheme 2021/22

Haringey Council's coordinated scheme is developed in line with the Pan London recommendations and sets out the procedures that all schools for which Haringey is the admitting or coordinating authority agree to sign up to.

In-Year Fair Access Scheme

The 2021/22 arrangements also contain an In-Year Fair Access Scheme which acknowledges the need to deal with vulnerable young people who are not on the roll of a school, quickly and sympathetically. This scheme also fairly shares the burden of admitting vulnerable students across all schools and academies, taking account of their resources to support each student.

Relevant Legislation

According to the Equality Act 2010 an admission authority must not discriminate on the grounds of disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex, or sexual orientation against a person in the arrangements and decisions it makes as to who is offered admission as a pupil. This Act contains limited exceptions to the prohibition of discrimination on grounds of religion or belief and sex. Schools designated by the Secretary of State as having a religious character (faith schools) or single sex schools are exempt as they are allowed to make a decision based on religious belief or sex respectively.

Admission authorities are also subject to the Public Sector Equality Duty and therefore must have due regard to the need to eliminate discrimination, harassment, and victimisation, advance equality of opportunity and foster good relations in relation to persons who share a relevant protected characteristic and persons who do not share it.

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
Sex	May 2019 School census / SFR25 2016/2017
Gender Reassignment	No national or local collected data
Age	May 2019 School census
Disability	2019 data from Haringey SEN team
Race & Ethnicity	January 2019 School census (which has ethnicity)
Sexual Orientation	No local collected data on sexual orientation, however there is ONS annual population data (2016) and ONS sexual identity, UK (2015), which are estimates.
Religion or Belief (or No Belief)	Synthetic data derived from the 2011 ONS National census
Pregnancy & Maternity	2011 census
Marriage and Civil Partnership	2011 census

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.

1. Sex

Figure 1 - Service users (Primary and secondary age children by Sex) - Haringey

	Primary Reception to Yr 6	Secondary Yrs 7-11	Grand Total	Primary Reception to Yr 6	Secondary Yrs 7-11	Grand Total
Female	10,547	6,235	16,782	49%	48%	49%
Male	10,973	6,733	17,706	51%	52%	51%
Grand Total	21,520	12,968	34,488	100%	100%	100%

Source: School Census May 2019

There are slightly more male than female pupils in primary and secondary school.

Figure 2 - Staff at Haringey schools

	All teachers who are male (%)	All teaching assistants who are male (%)	All Non-classroom Based School Support Staff who Are Male (%)	Auxiliary Staff who Are Male (%)
Haringey	28.4%	16.1%	24.8%	20.3%

Source: SFR25 2016/2017

Note: Data is as at November 2016 and for primary and secondary schools.

The majority of Haringey school staff are female, and this is reflected in each category of school staff. The imbalance of teaching staff is most apparent in teaching assistants, of

which 16.1% are male across all Haringey schools.

2. 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 not 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. For the purposes of this EqlA, we will use the inclusive term Trans* in order to represent the spectrum of transgender and gender variance.

3. Age

Figure 3 - Service users (Primary and secondary children by Age)

Year group	Number – All Haringey schools
Reception	3,019
Year 1	2,964
Year 2	3,039
Year 3	3,097
Year 4	3,156
Year 5	3,088
Year 6	3,157
Primary Reception to Yr 6	21,520
Year 7	2,784
Year 8	2,554
Year 9	2,575
Year 10	2,571
Year 11	2,484
Secondary Yrs 7-11	12,968
Year 12	1,134
Year 13	855
Year 14	13
Sixth Form	2,002
Grand Total	36,490

Source: School Census May 2019

Broadly, the number of children entering Haringey's school system has increased year-on-year though primary cohorts are now reducing whilst secondary cohorts are growing.

4. Disability

Figure 4 - Service users: Total number of Children & Young People with statements or plans maintained by Haringey as at April 2019

Year	Totals	Year	Totals
Pre-School/Nursery	36	Year 9	143
Reception	80	Year 10	136
Year 1	93	Year 11	154
Year 2	99	Year 12	130
Year 3	106	Year 13	106
Year 4	133	Year 14	114
Year 5	111	Year 15	98
Year 6	128	Year 15 plus	153
Year 7	132	Totals	2,082
Year 8	130		

Source: Haringey SEN team 2019

While we have a range of children with disabilities, to meet their needs, social and medical considerations are given higher priority under the admission arrangements. We do not have data on pupils with less complex disabilities who do not qualify for this criteria.

5. Race and ethnicity

Figure 5 - Service users: Ethnic composition (main groups) of Haringey's school pupil population as at January 2019:

	Haringey	
	Number	%
Any other white background	10,724	28.0%
White British ethnic origin	7,611	19.9%
Black African ethnic origin	5,386	14.0%
Any other ethnic group ethnic origin	2,651	6.9%
Black Caribbean ethnic origin	2,635	6.9%
Any other mixed background ethnic origin	2,026	5.3%
White and black Caribbean ethnic origin	1,074	2.8%
Bangladeshi ethnic origin	1,006	2.6%
White and Asian ethnic origin	794	2.1%
Any other black background ethnic origin	754	2.0%

white and black African ethnic origin	585	1.5%
Any other Asian background ethnic origin	527	1.4%
Indian ethnic origin	361	0.9%
Chinese ethnic origin	359	0.9%
Pakistani ethnic origin	347	0.9%
Irish ethnic origin	289	0.8%
Gypsy/Roma ethnic origin	125	0.3%
Traveller of Irish heritage ethnic origin	43	0.1%
Number of pupils unclassified	1,041	2.7%
Grand Total	38,338	100%

Source: School Census January 2019

Notes: Sample includes all pupils recorded on the January 2019 School census except London Academy of Excellence and Haringey sixth form college

28.0% of Haringey's pupils are Any other white background whilst 19.9% are White-British. Some 14.0% of primary pupils are Black African with a further 6.9% each either Black Caribbean or Any other ethnic group origin.

Figure 6 - Staff ethnicity: ethnic profile of Haringey teachers, teaching assistants, non-classroom based school support staff and auxiliary staff

Haringey	
BAME Teachers (as a proportion of all Teachers)	45%
BAME Teaching Assistants (as a proportion of all Teaching Assistants)	67%
BAME Non-classroom Based School Support Staff (as a proportion of all Non-classroom Based School Support Staff)	56.1%
BAME Auxiliary Staff (as a proportion of all Auxiliary Staff)	73.7%

Source: SFR25 2017 (latest available)

The staff ethnicity data shows the broad composition of ethnicities among classroom and non-classroom staff.

In three of the four groups, a majority of teaching staff are BAME (except BAME Teachers, who represent 45% of the overall Haringey teacher population). BAME communities are more likely to experience inequalities, such as discrimination and poverty.

A greater proportion of Haringey schools staff are White British as compared to pupils at Haringey schools.

6. Sexual orientation

We do not hold ward or borough level data on sexual orientation, and it is not collected nationally through the Census. 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 country², and is likely to be reflected in both the pupil and parent populations. However, ONS data shows that 0.5% families are same sex cohabitating couples³, which suggests that LGB people are less likely to be parents, compared with the wider population.

7. Religion or belief (or no belief)

Religion or belief is not covered by the PLASC school census, which means that we don't have access to records for 2017. The best alternative proxy is the Haringey data derived from the England and Wales Census 2011 data on religion by age. Data on the 0-19 age group (0-4, 5-7, 8-9, 10-14, 15, 16-17 and 18-19) has been combined to provide an approximation of the likely religious or belief profile of school age children in Haringey.

The notional number is based upon the known sample size of pupils in Haringey (38,338) used in the Race and ethnicity analysis in Table 5 multiplied through the distribution of religion or belief from the 2011 Census. Data has been rounded to illustrate that these are synthetic estimates.

Figure 7 – Religion of pupils attending Haringey community schools

	Haringey	
	Percentage (%)	Notional Number
Christian	41.1%	15,750
Muslim	21.3%	8,150
No religion	20.0%	7,650
Religion not stated	10.4%	4,000
Jewish	4.9%	1,900
Hindu	1.0%	350
Buddhist	0.7%	300
Sikh	0.3%	150
Other religion	0.2%	100
Total	100%	38,338

Source: ONS (2011 Census data for Haringey)

Note: * Totals may not add up due to rounding

²<https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/sexuality/articles/subnationalsexualidentityestimates/uk2013to2015#introduction>

³<https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/sexuality/bulletins/sexualidentityuk/2015>

8. Pregnancy and maternity⁴

Figure 8

The proportion of 0-4 year olds according to the Office for National Statistics mid-year population estimates as at June 2018:

Area	Number of 0-4 year olds
Haringey	6.9%
London	6.9%
England and Wales	5.9%

Haringey has a higher proportion compared to the England and Wales average, but is the same as the London average.

9. Marriage and Civil Partnership⁵

Figure 9

	Married (heterosexual couples)	Civil Partnership
Haringey	32.2%	0.6%
London	40%	0.4%
England and Wales	47%	0.2%

The number of married people (only available to heterosexual couples at the time) is significantly lower than in London and England. However, the proportion of people in civil partnerships is higher in the area compared to the London and England and Wales average. Decisions will need to ensure all couples in a civil partnership are treated exactly the same as couples in a marriage.

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 EqlA guidance

The consultation seeks to establish the key concerns and issues of stakeholders and clarify if they identify those issues also shown in the EqlA. Stakeholders such as pupils, parents, carers, school staff and governors will be invited to participate in a consultation and share their views including whether or not they agreed with each proposal and if not, why not. To this purpose an annual Admissions Arrangements survey has been developed which attempts to ascertain views on several education themes such as Primary, Secondary and Sixth form.

⁴ ONS Mid year population estimates as at June 2018

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/datasets/populationestimatesforukenglandandwalesscotlandandnorthernireland>

⁵ Census 2011

To ensure as wide a consultation as possible, a range of modes and methods of communication will be used to inform and facilitate feedback from stakeholders regarding the proposal -

- through the Schools Bulletin which is distributed to the headteacher and chair of governors of every school in the borough
- to all children's centres in the borough
- to all registered nurseries and child minders and any other early years providers
- on the Council's online primary and secondary admissions page
- via information in all libraries across the borough
- to all councillors
- to both MPs with constituencies in Haringey
- to the diocesan authorities
- to neighbouring authorities
- other groups, bodies, parents and carers as appropriate

Stakeholders will also be given the opportunity to express their views in writing via a questionnaire – both electronically and via the hard copy attached to the consultation document, by email and post.

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?

ADD TO THIS SECTION ONCE WE HAVE RECEIVED RESPONSES FROM THE CONSULTATION

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 (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	X	Unknown	
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				impact		Impact	
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All primary and all but one of the secondary schools within the borough are coeducational.

For all of these schools, the gender of the pupil is not a factor of the admission arrangements, so this protected characteristic is not affected.

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)*

There are no proposals in the Admissions Arrangements that affect this protected characteristic.

Positive		Negative		Neutral impact		Unknown Impact	X
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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	
----------	---	----------	--	----------------	--	----------------	--

The policy applies equally to all children of statutory school age as defined by the Admissions Code 2014.

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	
----------	---	----------	--	----------------	--	----------------	--

Section 324 of the Education Act 1996 requires the governing bodies of all maintained schools to admit a child with a statement of special educational needs/EHCP that names their school. These children are placed in the relevant school before all other places are allocated.

Where a child with a disability or special educational need is to attend a Special School, allocation of places is through a specialist panel and are outside of the scope of these admission arrangements.

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	X	Neutral impact		Unknown Impact	
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Positive - The Local Authority has a duty to ensure the proposed arrangements do not unfairly disadvantage any child based on race

Translated applications are available on request for those who do not have English as their first language and face to face workshops are held for parents of prospective applicants to support their application process.

Negative - In the proposed arrangements, children arriving into the borough after the application date, which will include migrants from other countries, will have their applications dealt with as a late application. In line with the Pan London co-ordinated scheme, Haringey will accept late applications and process them as on time only if they are late for a good reason and supported by written independent evidence. Upon receipt of the written independent evidence, each case will be decided on its own merits. This information is published online within the School Admissions prospectuses.

The latest date for the late applications which are considered to be on-time within the terms of the home LA's scheme is 11 December 2020 (Secondary Transfer) and 10 February 2021 (Starting Reception). These dates are agreed annually in line with the Pan London co-ordinated scheme in order to enable the efficient processing and data sharing iterative processes which take place across all boroughs following these dates.

This approach is seen as fair and necessary in line with the Pan London co-ordinated scheme and the School Admissions Code (2014) which defines the application deadlines as 'closing dates' at paragraph 1.32C."

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	
----------	---	----------	--	----------------	--	----------------	--

All schools included in the arrangements have to admit pupils regardless of sexual orientation.

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)*

For community and VC schools, religion is not a factor of the admission arrangements.

The governing bodies of faith schools are the admitting authorities for these schools and the admissions criteria are therefore outside of these arrangements. Faith schools are allowed to set objective criteria relating to faith, in line with the mandatory provisions of the Schools Admission Code.

Positive		Negative		Neutral impact	X	Unknown Impact	
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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*)

In addition to the criteria set out in Section 1, if only one place is available at the school and the next child who qualifies for a place is one of multiple birth, the Local Authority would ask community schools to go over their published admission number. This aspect of the criteria ensures that multiple birth families are not disadvantaged by the proposed arrangements.

Positive	X		Negative		Neutral impact	Unknown Impact	
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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*)

There are no proposals in the Admissions Arrangements that affect this protected characteristic.

Positive		Negative		Neutral impact		Unknown Impact	X
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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 proposed admission arrangements for 2021/22 do not differ materially from the arrangements for previous years and we therefore do not consider that there are any new or specific Equalities issues to emerge from these general admissions arrangements. We continue to monitor and assess the impact of any changing trends.

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. <u>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.</u>			Y
Adjust the proposal: the EqIA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. Clearly <u>set out below</u> 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
N/A			
N/A			
N/A			
N/A			
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 except for comments (3 bullet points) immediately above.			
6 c) Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented:			
Training – Staff in the Haringey School Admissions service are provided with yearly refresher training in line with the admission arrangements, which addresses any changes to either the criteria or co-ordinated schemes.			

Monitoring - The Head of Admissions, Education and School Organisation at Haringey Council will be responsible for monitoring. The School Admissions Return to DfE is an Annual report which sets out information on the effectiveness of the admission arrangements e.g. number applicants who received one of their preferences for a school place. The annual report to the Office of Schools' Adjudicators monitors the fairness of the admission arrangements. This information will be reported to the DfE and the OSA annually.

Two main mechanisms will be used by the DfE to provide feedback on how effective the measures in the revised Codes and regulations have been and to inform future policy development. In producing his annual report for the Secretary of State, the Schools Adjudicator will take account of the reports he will receive from each local authority on the legality, fairness and effectiveness of local admission arrangements.

Appeal arrangements - Admission arrangements are subject to an appeal process that gives parents the right to appeal decisions. The process is also used to hold admissions authorities to account and ensure that the arrangements are applied.

7. Authorisation

EqlA approved byEveleen
 Riordan.....
 (Assistant Director)

Date10 October
 2019.....

8. Publication

Please ensure the completed EqlA is published in accordance with the Council's policy.

Please contact the Policy & Strategy Team for any feedback on the EqlA process.

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Report for: 12 November 2019

Title: Results of the consultation on the future of Stamford Hill Primary School and the proposed amalgamation with Tiverton Primary School



Report authorised by: Ann Graham, Director Children's Services

Lead Officer: Carlo Kodsi, Head of Admissions, Education and School Organisation Carlo.Kodsi@haringey.gov.uk Ext. 1823

Ward(s) affected: Place planning changes impact all schools, but with particular reference to Stamford Hill Ward

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

1. Describe the issue under consideration

- 1.1. To report to Cabinet on the outcome of a six-week formal consultation on the future of Stamford Hill Primary School.
- 1.2. Following an informal consultation and a report to the July 2019 Cabinet meeting, Council's Cabinet agreed to commence a formal consultation between 9 September and 21 October 2019 on the Council's preferred option of amalgamation.
- 1.3. Full consultation has now taken place over a period of more than 6 months to identify a best solution that can be delivered by September 2020. Officers continue to recommend to Council's Cabinet at para. 3 below that the overall best solution for the children of Stamford Hill Primary School is an amalgamation with Tiverton Primary School. Therefore, cabinet are asked to proceed to the publication of the appropriate Statutory Notice which includes a four-week representation period of statutory consultation which is published, and which is the final opportunity for people and organisations to express their views about the proposal.

2. Cabinet member introduction

- 2.1. Every child and young person, wherever they live in our borough, deserves an excellent education and, as a Council, we are committed to supporting our schools to continue to deliver high-quality teaching, learning and support across Haringey in a period where growing pressure on school budgets is being felt.
- 2.2. Following an 'inadequate' inspection judgement by Ofsted in November 2018, an Academy Order was made for Stamford Hill Primary by the Secretary of State for Education in December 2018. The Regional Schools Commissioner (RSC), on

behalf of the Department for Education, is currently seeking to identify an academy sponsor for the school. However, we do not believe that forced academisation is the right approach, and our preferred option is for a local solution that takes account of the wider needs of our schools' community.

- 2.3. The proposal will mean the closure of Stamford Hill Primary with the displaced pupils being accommodated by Tiverton Primary School, to create a single school operating from one site. The Council's preferred option would be pursued in parallel with the academisation currently sought by the RSC, as this will enable us to avoid delay in finding the best solution for current and future cohorts of pupils.
- 2.4. Significant concerns have been raised about the long-term sustainability of Stamford Hill Primary School in terms of the risks to its financial stability and its ability to attract pupils to the school. The latter is largely due to a flattening birth rate which is affecting many schools locally, and indeed schools across London. This means demand for school places has fallen in the borough and is now projected to remain broadly static until 2026/27 and possibly beyond.
- 2.5. For these reasons and having undertaken full consultation over a period of more than 6 months to identify a best solution, I recommend to Cabinet that the Council now proceeds to publishing the relevant Statutory Notice on the proposal to amalgamate Stamford Hill Primary School with Tiverton Primary School.

3. Recommendation

- 3.1. Cabinet are asked to **note**

- a) the summary of representations from the formal consultation at **Appendix 1**
- b) all material considerations listed at para 8.13
- c) the summary of benefits in support of amalgamation at para 8.14

- 3.2. Cabinet are asked to **agree**

to proceed to the publication of the appropriate Statutory Notice on the proposal to amalgamate Stamford Hill Primary School with Tiverton Primary School, which includes four-week representation period of statutory consultation which is published, and which is the final opportunity for people and organisations to express their views about the proposal.

4. Reasons for decision

- 4.1. There is significant concern over the long-term sustainability of Stamford Hill Primary School and, to a lesser extent, Tiverton Primary School, in terms of their falling rolls and the resultant risk to their financial stability. The former is a result of a flattening birth rate which means that local demand for school places has fallen and is projected to remain broadly static until 2026/27 and possibly beyond.
- 4.2. The Council has a duty of care to ensure children in its schools are able to receive a good education and to access the full curriculum. A school with a declining roll will be challenged to do this effectively because of inevitable financial pressures from reduced funding.
- 4.3. This report provides a summary of the representations received from the recent consultation at Appendix 1 together with representation from the informal

consultation at Appendix 2. Cabinet are asked to review the summary of representations and make an informed decision on the next steps based on all material considerations.

5. Alternative options considered

5.1. A number of options on the future of Stamford Hill Primary School were presented to local stakeholders as part of the informal consultation that initially took place between the 27 March and 8 May 2019. Stakeholders were informed of the reasons why these options were less desirable than the Council's preferred option of amalgamation.

- A) **Keeping Stamford Hill open:** This option does not provide a long-term sustainable solution to falling local demand and leaves other local schools vulnerable because demand for school places are falling more widely in the locality.
- B) **Federation:** Federation is an option that focuses on improving educational delivery by allowing the governing body to use budget, resources and staff across a federation to improve the educational outcomes for all pupils. This option would need another school to federate with Stamford Hill Primary. Also, under a federation, schools would remain as separate organisations and this would not address the decline in numbers on roll at Stamford Hill (and other local schools) or the financial challenges that other schools are facing. This option is therefore less desirable than amalgamation.
- C) **Amalgamation with split site:** This would involve Tiverton Primary School having two permanent sites and would not be desirable because it would involve the overheads of permanently running two sites in a context of falling demand for school places.
- D) **Closure of Stamford Hill Primary with pupils moving to other local schools (including Tiverton Primary):** This would involve closing Stamford Hill Primary School and giving parent/carers the opportunity to apply for a school place at any other Haringey primary school (including Tiverton) and in other local authorities. This option provides a less outcome focused solution to those parents with children currently at Stamford Hill Primary and doesn't provide a mechanism for ensuring cohorts of children are, as far as reasonably possible, kept together, which is an outcome some parents expressed as part of the informal consultation.

6. Background information

6.1. Following many years of borough-wide rising demand as a result of the growth in Haringey's population, the Council is now in a position of needing to reduce capacity as a result of a flattening birth rates and a higher than projected increase in outward migration. This has contributed to an unacceptably high surplus of places in some

school place planning areas, especially in Planning Area 3¹ (PA3) where current projections show a consistent surplus of approximately one form of entry in this planning area up until 2026/27.

Ofsted and Directive Academy Order

- 6.2. The possibility of bringing together both Stamford Hill Primary and Tiverton Primary in an amalgamation had arisen against a backdrop of falling rolls in the local area and also following an 'inadequate' (serious weaknesses) Ofsted judgement of Stamford Hill Primary in November 2018. Following the outcome of the Ofsted inspection, the school was subject to a Directive Academy Order for the purposes of enabling it to be converted to an Academy.
- 6.3. The Regional Schools Commissioner (RSC), on behalf of the Department for Education is currently seeking to identify an Academy sponsor for the school. However, the preferred option is for a local solution that takes account of the wider needs of the local school community. Officers in the Local Authority have discussed with the RSC the possibility of an amalgamation of the two schools to address falling demand for school places and the RSC is content that such a process can be pursued alongside the DfE's academisation process. If the amalgamation were to go ahead, the need for an academisation of Stamford Hill would fall away.
- 6.4. Preliminary discussions were held with Governors and senior leaders of both Stamford Hill and Tiverton Primary schools in the early months of 2019. As a result of these discussions, the Council reached an informed decision to commence with the informal consultation on the proposal to establish a new primary school through an amalgamation, such consultation to commence in March 2019.

Stamford Hill Primary School

- 6.5. Stamford Hill Primary School is a one-form entry school located on Berkeley Road, London, N15 6HD. As a one form entry school Stamford Hill Primary admits up to 30 pupils in the 'relevant age group'.²
- 6.6. Table 1 below shows a decline in pupils on roll at Stamford Hill Primary in recent years, culminating in a 60% shortfall in pupil numbers by October 2019. The significant decline in pupil numbers from May (144) to October 2019 (85) can be attributed to a number of factors, including –
 - A larger Year 6 cohort transferring to secondary school in September 2019,
 - Complying with parental preference which meant that some families were offered places at Tiverton Primary and other local schools via the in-year admissions process.
 - Some families living in Enfield and other neighbouring boroughs seeking places at alternative schools in their local area.
 - A higher proportion of pupils leaving the school compared with the majority of other schools in the planning area i.e. there is a historically higher mobility rate at Stamford Hill Primary.

¹ Haringey has five Planning Areas (PAs) for the purpose of school place planning to enable to plan effectively to meet local demand. PAs provide a useful framework to compare admissions application data, pupil projections, school roll information and housing developments across the borough. Planning Area 3 (PA3) comprises the following wards – St Ann's, Seven Sisters and the southern half of Harringay ward.

² This is the age group at which pupils are or will normally be admitted to the school e.g. reception or Year 7.

Table 1 - Stamford Hill Primary School Pupils on roll (Full School PAN 210 Pupils)

Pupils on Roll	2014	2015	2016	2017	2018	*May 2019	**October 2019
Stamford Hill	196	192	196	189	184	144	85
Shortfall	14	18	14	21	26	66	125
%	7%	9%	7%	10%	12%	31%	60%

*Pupils on roll from May census

**Current roll as at October 2019

Tiverton Primary School

- 6.7. Tiverton Primary is a 2-form entry school located almost immediately opposite Stamford Hill Primary, on the other side of Seven Sisters Road. Similarly, Table 2 shows that Tiverton has also experienced a gradual decline in recent years, culminating in a 25% shortfall in pupil numbers by 2019.

Table 2 – Tiverton Primary School Pupils on roll (Full School PAN 420 Pupils)

Pupils on Roll**	2014	2015	2016	2017	2018	May 2019*	October 2019**
Tiverton	394	404	392	352	338	318	313
Shortfall	26	16	28	68	82	102	107
%	6%	4%	7%	16%	20%	24%	25%

*Pupils on roll from May census

** Current roll as at October 2019

Per pupil funding

- 6.8. A large portion of the funding received by schools is directly related to the number of pupils on roll at the school. Too many vacancies in schools mean that schools are very challenged in being able to balance their budgets.
- 6.9. The Council is concerned that continuing falling rolls in schools in PA3, especially at Stamford Hill and Tiverton Primary, will impact significantly upon the financial sustainability of local schools and, in turn, their potential ability to raise the standards of pupil achievement.

Pupil numbers (vacancies)**Stamford Hill**

- 6.10. Table 3 below shows that there are currently vacancies across all year groups in Stamford Hill Primary with 85 pupils on roll as at October 2019. As a one form entry school, Stamford Hill has capacity to admit up to 210 pupils in the main school (Reception – Year 6).
- 6.11. The school is currently operating at less than 50% of its total capacity and at the beginning of September took the decision to close its year 2 class to run mixed-age groups in Year 1.

Table 3 – Pupils on roll at Stamford Hill Primary (R-Yr6)

Stamford Hill (PAN 30)	R	1	2	3	4	5	6
Numbers on roll	13	14	0	8	17	15	18
Vacancies	17	16	0	22	13	15	12

Current roll as at October 2019

Tiverton Primary School

- 6.12. Table 4 below shows that Tiverton Primary School also has vacancies across all year groups with 315 pupils on roll as at October 2019. As a two-form entry school, Tiverton Primary has a capacity to admit up to 420 pupils in the main school.

Table 4 – Pupils on roll at Tiverton Primary School (R-Yr6)

Tiverton (PAN 60)	R*	1*	2	3	4	5	6
Numbers on roll	30	31	60	44	42	52	54
Vacancies	30	29	0	16	18	8	6

Current roll as at October 2019

*The number of vacancies in the Reception and Yr. 1 classes is based on Tiverton having capacity as a 2-form entry school. Both classes have been capped at 30 following approval from the Office of the Schools Adjudicator for a reduction in PAN in 2018. The Council has also set the PAN at 30 for entry to Reception in September 2020 in the context of falling demand for school places in PA3.

- 6.13. More broadly, PA3 shows a significant number of vacancies across the school estate with Crowland, Seven Sisters, South Harringay, St Ignatius and St Mary's Priory all carrying up to or in excess of 30 vacancies each across the entire main school. This equates to 12.3% surplus vacancies cumulatively across all schools in PA3. The Department for Education (DfE) has previously recommended that Local Authorities maintain no more than 2 - 5% surplus capacity to ensure that pupils arriving in-year can be offered a school place, and to allow for movement between schools based on parental preference.
- 6.14. Surplus rolls at too high a level can affect the viability and sustainability of schools. If amalgamation were to go ahead and all displaced pupils at Stamford Hill transferred to Tiverton Primary or other local schools within PA3, then the local cumulative surplus of 12.3% across PA3 incorporating all year groups would be significantly reduced. The current estimate (based on October 2019 figures) is that the overall surplus would be reduced to approximately 7.1% which is more in line with the DfE recommendation.
- 6.15. The proposed amalgamation of Stamford Hill Primary School with the displaced pupils being accommodated by Tiverton Primary School would result in Tiverton and its site eventually operating as a viable two-form entry school. This is more aligned with the current level of projected demand in the area. It is predicted that Tiverton Primary School would satisfactorily fill two forms of entry as opposed to the current significant surplus created by three forms of entry across two individual schools.

Modelling based on a proposed amalgamation from September 2020

6.16. Table 5 below shows the theoretical impact on pupil numbers based on the proposed closure of Stamford Hill with the displaced pupils being accommodated by Tiverton Primary School (one site) from September 2020.

Table 5 - theoretical modelling based on a proposed amalgamation from September 2020, using 2019 data as a baseline for predicted 2020 data

	Pupils expected to be on roll as at September 2020								
	Capacity	R*	Y1	Y2	Y3	Y4	Y5	Y6	Pupil* roll
Stamford Hill	210	30 or fewer	13	14	0	8	17	15	97
Tiverton	420	30 or fewer	30	31	60	44	42	52	289
Amalgamated school	420	60 or fewer	43	45	60	52	59	67	386
+ / - admission number (60)		0	17	15	0	8	1	-7	34

*First place preference data for entry in September 2020 will be available in January 2020 and will give an indication of how many places will be offered to Reception pupils.

** Total pupil numbers based on all year groups and an expected full reception class

6.17. The table above shows a hypothetical model whereby an amalgamated school is established from September 2020 through an amalgamation between Stamford Hill and Tiverton Primary schools. This does not include a temporary split-site scenario in operation from September 2020 (i.e. using both the Tiverton and Stamford Hill sites for a period of time), although further modelling is in progress to see if and how this might be achieved and to allow for onsite provision at Stamford Hill to continue where needed.

6.18. Based on this theoretical model for 2020, the current Year 6 cohort leaving in July 2020 at Stamford Hill will have already transferred to secondary school (the current year 6 leaving in July 2020). Year 1 pupil data for 2020 in the table above is based on pupils who started Reception in September 2019 in both schools and would therefore progress to Year 1 in the following September (2020).

6.19. The modelling in the table above also includes the caveat that there would be no mobility or churn between now and September 2020 i.e. no pupils leaving or joining the schools in this interim period. Of course, we know that this won't be the case, but for the purposes of modelling we have assumed no mobility rather than attempt to estimate what that mobility might be.

6.20. Although the in-year application process³ remains open, we are not anticipating a huge number of pupils joining Tiverton and Stamford Hill Primary (or other local

³ In-year applications are applications for a school place at any time outside the normal admissions round. For example, applicants wishing to transfer from one school to another or arriving from other parts of the country or overseas.

schools within PA3) between September 2019 and September 2020, or indeed significantly beyond this date.

- 6.21. Historically, mobility rates at both Tiverton and Stamford Hill Primary schools have been high. The number of families leaving tends to be balanced out by a similar number joining these schools (net mobility). Amongst factors affecting school mobility in this planning area are - flux associated with people moving in/out of nearby private sector rented housing; churn in social housing (especially where property has been rented out by leaseholders to families); rises in property and rental prices which may displace some families; uncertainty surrounding Brexit with some European families leaving the local area; new housing developments and their cost and size.
- 6.22. Currently you will see from table 5 above that the overall admission number in the main school would be 386 out of a possible 420 pupils. The school therefore currently has the capacity to absorb the vast majority of pupils from Stamford Hill Primary. Any enlargement and/or significant alternation of Tiverton Primary School is, therefore, not likely to be required. The Council is committed to working closely with the school to maximise its available space so it can continue to ensure the successful learning of all pupils and that no disruption is caused as a result of any potential amalgamation. A programme of capital works may be required to accommodate any additional pupils; however, it is expected that a small minority of families from Stamford Hill are likely to transfer to alternative schools leaving even more capacity within the current structure.
- 6.23. If amalgamation were to go ahead, an admissions process enabling families to apply to alternative schools would be implemented prior to the establishment of the new school in September. It is expected that schools in the local area will still be carrying a high number of vacancies at this time which means that an alternative local school can be offered to any family that wants one. All Haringey schools in the area are judged by Ofsted to be 'Good' or 'Outstanding.'
- 6.24. Pupils joining other local schools from Stamford Hill Primary will contribute towards the improved sustainability of the receiving schools as they will be able to increase their pupil numbers and, in turn, their financial income.
- 6.25. Following the complete vacation of the Stamford Hill site, the Local Authority will consider the wider needs of our children, young people and school in determining a use of the site that keeps it in education use if that need can be demonstrated. This includes but is not limited to SEND provision, alternative provision and future proofing for an inevitable return to a rise in pupil numbers in the next 7 to 20 years.

7. Consultation – informal pre-consultation and consultation

- 7.1. An informal six-week consultation took place between 27 March and 8 May 2019. Parents, staff and members of the community at Stamford Hill and Tiverton Primary Schools were invited to two public meetings to discuss options for the future of Stamford Hill Primary School. The meetings were held at the respective schools and were both well attended.
- 7.2. This was followed by a six-week consultation on the proposal to amalgamate Stamford Hill with Tiverton Primary School which took place between 9 September and 21 October 2019. A further two public meetings were held as part of this six-week consultation. Individuals and translators representing the 4 main languages

from the local community attended all public meetings held - Polish, Portuguese, Spanish and Turkish.

- 7.3. Prior to the start of these consultations, Officers held a series of preparatory meetings with Stamford Hill and Tiverton Primary Schools to discuss the background and process for the consultation. These included separate meetings with the Headteacher and Chair of Governors.
- 7.4. The following formal meetings mentioned above were held as part of the pre-consultation and consultation, to give the opportunity to ask questions and make views known:

<u>Pre-consultation (informal)</u>	
Wednesday 3 April 2019 at 6pm at Stamford Hill	Parents/carers/staff and local community
Thursday 25 April 2019 at 9.15am at Tiverton	Parents/carers/staff and local community
<u>Consultation (formal)</u>	
Monday 16 th September 2019 at 1pm at Stamford Hill	Parents/carers/staff and local community
Monday 7 th October at 9.15am at Tiverton	Parents/carers/staff and local community
16 th October 2019 at 4pm at Stamford Hill Primary	Staff and Trade Unions representatives

- 7.5. Details of the outcomes of the six-week consultation are given at Appendix 1.
- 7.6. Consideration of representation from the informal consultation are attached at Appendix 2 with more detailed statistical analysis of responses at Appendix 3.
- 7.7. The recent six week consultation included:
- letters to parents and staff at both Stamford Hill and Tiverton Primary schools;
 - a questionnaire response sheet issued to all parents, staff and Governors of Stamford Hill and Tiverton Primary schools. This document was also made available on the Council's website and in local libraries for inviting comments, with the option of responding via an online survey.
 - Leaflets distributed to all Haringey primary and secondary schools, nurseries, children centres and libraries in Haringey.
 - A consultation FAQs document
 - emails sent to all local Haringey primary and secondary schools, nurseries, children centres, MPs, trade unions, the diocese and neighbouring authorities
 - Two public meetings held at both schools. The issues surrounding the potential amalgamation were discussed and those present were able to ask questions and express views.
 - A meeting held with staff and trade union representatives at Stamford Hill Primary school.
- 7.8. The consultation survey, FAQs and minutes from the public meetings were translated into the 4 main languages (Polish, Portuguese, Spanish and Turkish) and uploaded to the Council's consultation webpage.

Responses to the consultation – Consideration of Representation

- 7.9. A statistical summary of the responses to this most recent consultation and Officer's response to the points not in favour of the proposal are shown at Appendix 1.
- 7.10. A total of 13 responses were received from the consultation. Officer's response to the points raised by individuals not in favour of the proposal can be found at para 5 of Appendix 1.
- 7.11. The representation received make several points which have previously been raised at the informal consultation stage with local stakeholders, and which Cabinet have considered sensitively, taking into account all issues and implications of a decision to amalgamate Stamford Hill Primary School with Tiverton Primary School.
- 7.12. As the main driver of school funding is pupil numbers there continues to be a significant concern about the long-term sustainability of Stamford Hill Primary School in terms of the risks to its financial stability and its ability to attract pupils to the school against a backdrop of falling demand which is projected to remain broadly static until 2026/27. As set out above the school is now at low levels in terms of pupil numbers and it currently operating at less than 50% of its capacity.
- 7.13. For these reasons together with careful consideration of a number of other material factors listed in 8.14 below, Council's Cabinet is asked to continue to take the proposal forward to the next phase by agreeing to publish a Statutory Notice on an amalgamation between Stamford Hill Primary and Tiverton Primary School.
- 7.14. In considering whether to take to the proposal forward by agreeing to publish a Statutory Notice, Cabinet are asked to consider a number of factors, including:
- views gathered from all stakeholders as part of the informal pre-consultation and consultation;
 - the impact on the quality of education delivered to pupils attending Tiverton and Stamford Hill Primary Schools and other local schools;
 - the need for school places against a backdrop of falling rolls;
 - Stamford Hill Primary's ability to survive financially with very low pupil numbers;
 - the ability of local schools to be able to survive financially;
 - how pupils will be able to be accommodated at Tiverton Primary School if the amalgamation were to go ahead;
 - the need to ensure that cohorts of children are, as far as reasonably possible, kept together including the opportunity for pupils and parent/carers to maintain friendship groups and for siblings to attend the same school.

Summary of benefits in support of amalgamation

- 7.15. The following is a summary of the benefits asserted by the LA in support of an amalgamation:
- Amalgamation can provide a foundation for sustainable long-term development and improvement as an increase in pupil numbers will result in additional revenue for the new primary school.
 - A two-form entry school rather than three forms across two schools is more aligned with the current level of projected demand in PA3 and will financially benefit local schools by assisting them to fill closer to their PAN.

- The new school established through an amalgamation will continue to have strong links with its local community and keep its individual identity.
- Tiverton Primary School is rated Good by “Ofsted” and strong leadership using strategic leadership and management structures will allow school-based leaders to focus on teaching, learning and raising standards further.
- Continuing support from the Haringey Education Partnership on all school improvement or school organisation issues.

8. Statutory consultation and next steps

8.1. **Statutory Consultation process and next steps** – there are 4 main stages summarized in the table below, with indicative timescales:

Stage	Description	Timescale	Comments
1	Publication of Statutory Notice	1 day	<p>Propose to publish Statutory Notice on 20 November 2019.</p> <p>Publication of the Statutory Notice commences the statutory Representation Period.</p> <p>Within 1 week of date of publication, the Proposer must send a copy of the full proposal to the governing body, Secretary of State, the CoE and RC Dioceses and any other body or person that the Proposer considers appropriate.</p>
2	Representation Period	4 weeks from date of publication of Statutory Notice	<p>Representation Period to end 18th December 2019</p> <p>Formal consultation of statutory and other stakeholders:</p> <ul style="list-style-type: none"> - Governing body - Pupils at the school - Parents of pupils at the school - Teachers and staff at the school - Any LA likely to be affected, including neighboring authorities where there may be significant cross border movement of pupils - Governing bodies, teachers and staff of any other school that might be affected, including any feeder schools and schools to which pupils may be dispersed - Parents of pupils at any other school that might be affected, including any feeder schools and schools to which pupils may be dispersed - Trades Unions - MP's whose constituencies include the school that is the subject of the

			<p>proposal or whose constituents may be affected by the proposal</p> <ul style="list-style-type: none"> - Any other interested organization/person that the proposer considers appropriate. <p>During the Representation Period, any person or organization can submit comments to the LA on the proposal to be taken into account by the Decision Maker. Any requests for a copy of the full Proposal must be sent out to the person requesting it within 1 week of receiving the request.</p>
3	Decision	LA should decide within 2 months, otherwise it must be referred to the Schools Adjudicator	<p>Key Decision</p> <p>Formal report to Cabinet setting out summary of representations received and any responses made, risks and opportunities, Officer recommendations and decisions available to Cabinet (approve without modification, approve with modifications, approve (with or without modification) subject to conditions as specified in the Establishment and Discontinuance Regulations, or reject)</p> <p>The timescales for publication of the Notice and conclusion of the Representation Period will identify the 2-month decision making period.</p> <p>The decision is proposed to be taken at Cabinet on 23 January 2020.</p>
4	Implementation	<p>No prescribed timescale however the date of implementation must be specified in the published notice and is subject to any modifications imposed by the Decision Maker.</p> <p>Consideration should be given in the Proposal for phased implementation plan for closure and impact upon pupils taking or due to take statutory examinations during the phases of implementation.</p>	<p>It is proposed to phase the implementation of the closure as follows:</p> <p><u>January 2020 – July 2020</u></p> <p>No changes: All existing year groups to continue at Stamford Hill Primary School</p> <p><u>September 2020</u></p> <p>Stamford Hill Primary School is closed from 31st August 2020.</p> <p>All pupils from Stamford Hill Primary School will move to Tiverton Primary School or an educational provision may be delivered across two sites (split site) for an interim period.</p>

- 8.2. As shown above, the next stage in the amalgamation process will be for the Council to agree to publish a Statutory Notice to close Stamford Hill Primary School in November 2019 and to establish a new primary school through an amalgamation with Tiverton Primary School from 1 September 2020.
- 8.3. Following publication of the Statutory Notice there will follow a four-week representation period of statutory consultation which is published, and which is the final opportunity for people and organisations to express their views about the proposals. At the end of the representation period the Council will gather together all the responses and documentation and the Council's Cabinet will then determine the Statutory Notice and decide whether or not Stamford Hill Primary will close and be amalgamated with Tiverton Primary School.
- 8.4. The key decision at this stage for members is to consider and make a determination on whether Cabinet now agrees to continue with the proposal and proceeds by publishing the Statutory Notice.

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

Comments of the Assistant Director of Corporate Governance and legal implications

- 9.1. The Assistant Director of Corporate Governance has been consulted in the preparation of this Report.
- 9.2. Section 15 and 16 of the Education and Inspection Act 2006 requires the Council to publish and consult on proposals to discontinue (close) a maintained school. Regulations 11 and 12 of The School Organisation (Establishment and Discontinuance of Schools) Regulations 2013 sets out the information to be contained in the proposals and the publication requirements. The Council must also have regard to the statutory guidance issued by the DFE "Opening and Closing Maintained Schools 2018" which includes guidance on the publication of proposals for consultation..
- 9.3. The recommendations are within the legal powers of the Council.

Comments of the Chief Finance Officer and financial implications

- 9.4. The Council must also continue to parallel plan as an Academy Order was made in December 2018, the Council is still under a duty (section 5B of the Academies Act 2010) to take all reasonable steps to facilitate the conversion of Stamford Hill Primary School into an Academy. In the event the Department for Education notifies the Council that the Secretary of State is minded to enter into Academy arrangements with a specified person (i.e. has selected what is considered to be a suitable academy sponsor for the school) then the Council will be under a duty to take all reasonable steps to facilitate the making of Academy arrangements with the sponsor.
- 9.5. The proposal to establish a new primary school through an amalgamation between Stamford Hill and Tiverton Primary Schools in September 2020 is due to significant financial risk to the Council.
- 9.6. Stamford Hill Primary's closing balance as at 31 March 2018 reported a deficit of £120,218, reducing to £46,354 as at 31 March 2019.

- 9.7. Tiverton Primary reported a surplus of £167,558 as at 31 March 2018 and closed with a deficit of £190,887 as at 31 March 2019.
- 9.8. If Council's Cabinet were to proceed with an amalgamation then the new primary school would need to review their current cost of delivery model, ensuring that it is delivered against a balanced budget. This would entail the development of a single staffing structure for the new school.
- 9.9. Stamford Hill and Tiverton Primary schools are both currently facing a gradual decline in pupil numbers which would have a significant financial implication for both schools over future years. The proposed amalgamation should bring greater financial stability by bringing together resources, synergy and value for money in delivery provision under one senior leadership structure.
- 9.10. There are a number of factors that should be considered if Council's Cabinet were to agree to proceed with an amalgamation following the prescribed statutory consultation and representation periods:

A) Funding implications

- One Dedicated School Budget from the date of amalgamation
- Currently both schools are funded for lump sum funding of £170,000 each under current soft National Funding Formula. This will therefore mean a reduction in Lump Sum funding as a result of amalgamation. However, the new school will retain the equivalent of 85% of the predecessor school's lump sums for the financial year of the amalgamation. This is subject to change if there are any alterations in the National Funding Formula for 2020/21.

B) Split site funding

- Additional funding of £60,000 (based on current DSG formula) for split sites *if* provision is delivered over two sites.

C) Combined Structure

- Both schools should prepare a combined budget before and after the amalgamation to identify any redundant costs that can be eliminated to achieve the desired savings over the longer term.
- Operational staff teams should be reviewed as part of the combined structure to calculate the actual cost of the new structure.

D) Cash Flow Advance (Loan)

- Stamford Hill Primary school are currently due to repay Haringey Council any outstanding cash advance upon conversion.
- At the time of conversion on the 31 August 2020, the cash advance will be not be transferred to the new school as the loan will be offset by the Council.

E) Financial Controls and Deficit

- Stamford Hill Primary school should deliver a balanced budget at the time of conversion, to avoid any transfer of financial burden going forward.
- Tiverton Primary School should review their current structure and complete a corporate finance approved deficit recovery plan that shows they have a sustainable position for the longer term.
- The current deficit as at 31 March 2019 for Stamford Hill Primary School was £46,354. We envisage there will be no significant changes on 31 August 2020 at the time of amalgamation and the deficit will be offset by the Council.

- 9.11. Haringey Council will need to put measures in place to ensure the financial budget is well controlled during any potential amalgamation process and any long-term financial commitments are avoided or require approval by the Council.

Equalities Comments

- 9.12. An Equalities Impact Assessment (EqIA) is attached at Appendix 4. This is an assessment of the potential impact of the proposed closure of Stamford Hill Primary School, with the displaced pupils being accommodated by Tiverton Primary School schools based on consideration of all the relevant data. The EqIA has been updated following the informal consultation and consultation to address the issues raised and will be further updated if Cabinet decide to publish a Statutory Notice and proceed to a 4-week representation period.
- 9.13. **Service users (children at Stamford Hill)** - A comprehensive EqIA has not identified any negative impact on any of the specified Equality characteristics / protected groups which include Sex, Gender Reassignment, Age, Disability, Race & Ethnicity, Sexual Orientation, Religion or Belief (or No Belief), Pregnancy & Maternity and Marriage and Civil Partnership. In terms of pupil composition Stamford Hill shares many similar characteristics with other Haringey primary schools located in PA3 and sufficient places exist at Tiverton Primary School and other neighbouring schools to absorb displaced pupils. Moreover, all surrounding schools are judged by Ofsted to be 'good' or 'outstanding' and are able to support all children to ensure a high standard of learning.
- 9.14. **SEN** - Whilst Stamford Hill has a very low proportion of pupils with SEN, they nevertheless are a vulnerable group who could be particularly affected by closure although this could be mitigated by good transition planning. Any children with special education need and disabilities (SEND) entitled to free transport if they can't walk to school because of their SEND or mobility problem will continue to receive free school transport.
- 9.15. **Staffing implications** - The key equality characteristic that has emerged from the EqIA is Sex. The closure of Stamford Hill will inevitably impact on staff working at the school. Due to the predominance of female staff over male staff in Stamford Hill Primary school (and indeed in primary schools across the country), they are likely to be affected in greater numbers. Linked to this equality characteristic is another, Pregnancy & Maternity.
- 9.16. In terms of mitigating the impact on both of these equality characteristics, the Council will endeavour to ensure all staff affected by the proposal to close Stamford Hill primary school will be given access to redeployment options and given support to find alternative roles within Haringey, if necessary. There are currently only two permanent members of teaching staff at Stamford Hill who will have access to this support as the remaining are employed as agency workers on a short-term basis. There are 14 non-teaching support staff employed by the Council that will also be supported in this way.
- 9.17. It is likely that many staff will also be anxious about changes if an amalgamation were to go ahead. Professional HR support has been made available to support these staff members to help them deal with the changes and find a way to manage and continue with their role.

- 9.18. The LA has discussed with both schools' Governing Bodies and leadership teams the recruitment and redeployment process that will operate if amalgamation were to go ahead and what impact this might have for the staff affected, including any potential redundancy package on offer. These discussions have initially been held with the existing Governing Bodies and with staff and trade unions representatives as part of the recent consultation. In the event of the process moving to the statutory four-week representation period, further discussions and meetings would be held with a combined temporary Governing Body and trade unions representatives.

10. Use of Appendices

1. Appendix 1 – Responses to the consultation and consideration of representation
2. Appendix 2 – Responses to pre-consultation and consideration of representation
3. Appendix 3 – Detailed statistical analysis and raw data from pre-consultation
4. Appendix 4 - EqlA

11. Local Government (Access to Information) Act 1985

This report contains no exempt information.

Background

1. Cabinet report March 2019 agreeing to commence pre-consultation
2. Cabinet report July 2019 agreeing to commence a six-week consultation
3. The Schools Standards and Framework Act 1998.
4. The Education Act 2002.
5. The Education and Inspections Act 2006.
6. Education and Skills Act 2008.
7. The School Admissions Code (December 2014).
8. The School Admissions (Admission Arrangements and Co-ordination of Admission Arrangements) (England) (Amendment) Regulations 2014
9. The School Admissions (Infant Class Sizes) (England) Regulations 2012.
10. The School Admissions (Appeals Arrangements) (England) Regulations 2012.
11. The Education Act 2011.
12. The School Admissions Appeals Code (2012).
13. The School Governance (Federations) (England) Regulations 2012.
14. The School Organisation (Establishment and Discontinuance of Schools) Regulations 2013
15. School roll projections sourced from the GLA
16. School roll information, including admission information from data held within Education Services
17. National College for Teaching and Leadership "The governance of federations" (August 2014)
18. Department for Education "Opening and Closing maintained schools" (November 2018)
19. Department for Education "Making significant changes ('prescribed alterations') to maintained schools" (October 2018).

Appendix 1

Title: Responses to the consultation and consideration of representation

1. Aim of paper

This report provides an analysis and full response from the recently undertaken consultation concerning the proposed amalgamation between Stamford Hill and Tiverton Primary Schools.

2. Background

In recent years there has been a gradual decline in pupils on roll at Stamford Hill Primary and it is predicted that continued falling numbers at the school will impact significantly upon the viability of the school looking forward.

In March 2019 Cabinet agreed that a pre-consultation would be carried out between 27 March and 8 May 2019 on a number of options for the future of Stamford Hill Primary School.

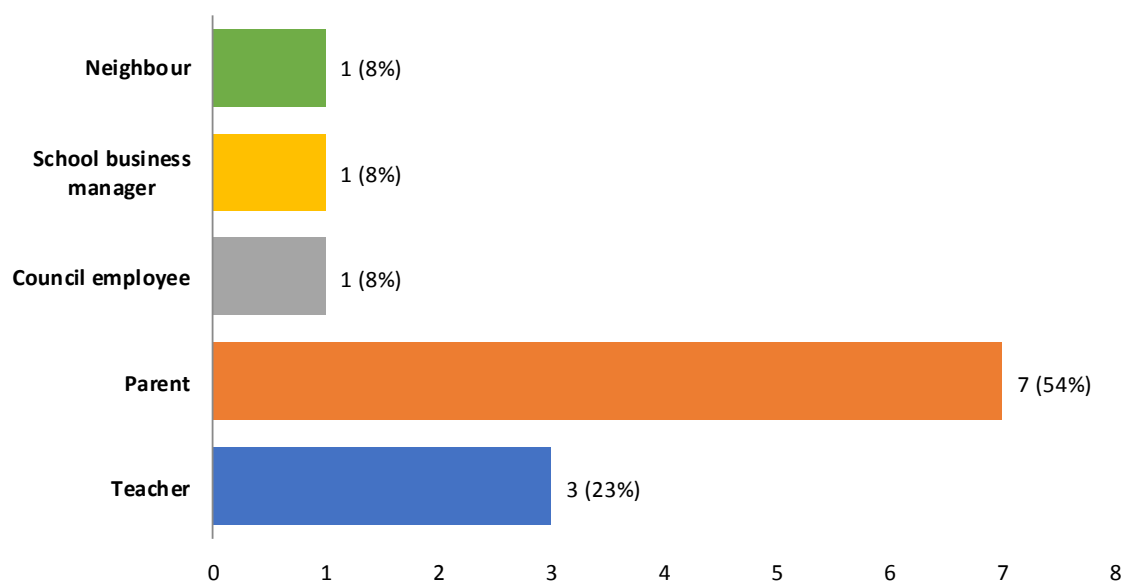
In July 2019 a Cabinet report set out the results of the pre-consultation and Cabinet agreed with the Council's recommendation to consult on the preferred option of an amalgamation between Stamford Hill Primary school with Tiverton Primary School.

3. Response number and respondent characteristics

A 6-week formal consultation was run between September and October 2019. Some 13 responses have been received as at Monday 28th October. Respondent characteristics are shown below:

Question 4 - Please tell us who you are? (tick all that apply)

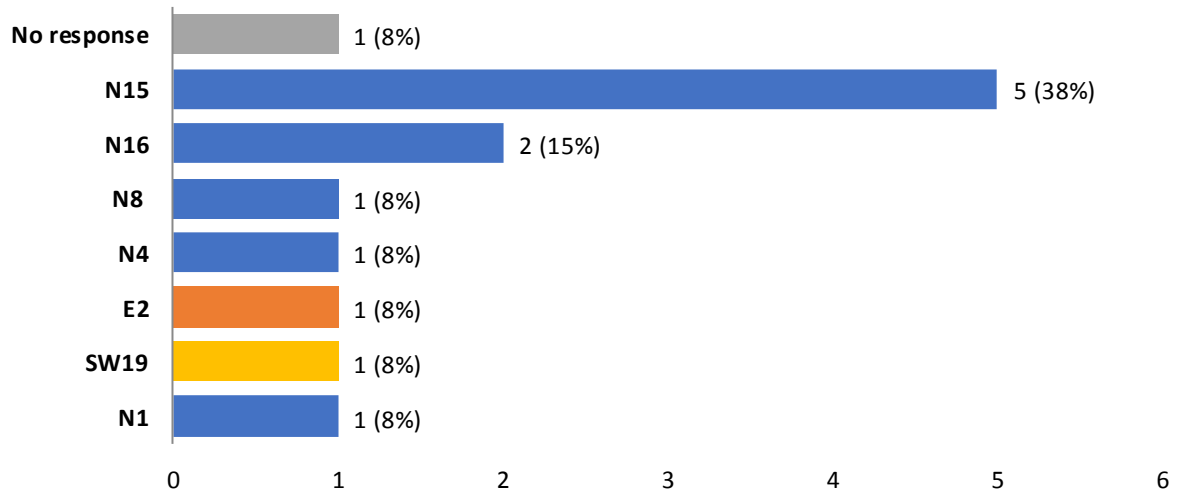
Source: Haringey Education Service 2019



7 respondents are parents, 3 teachers and 1 each a neighbour, a council employee and a school business manager.

Question 5 - What is your full post code?

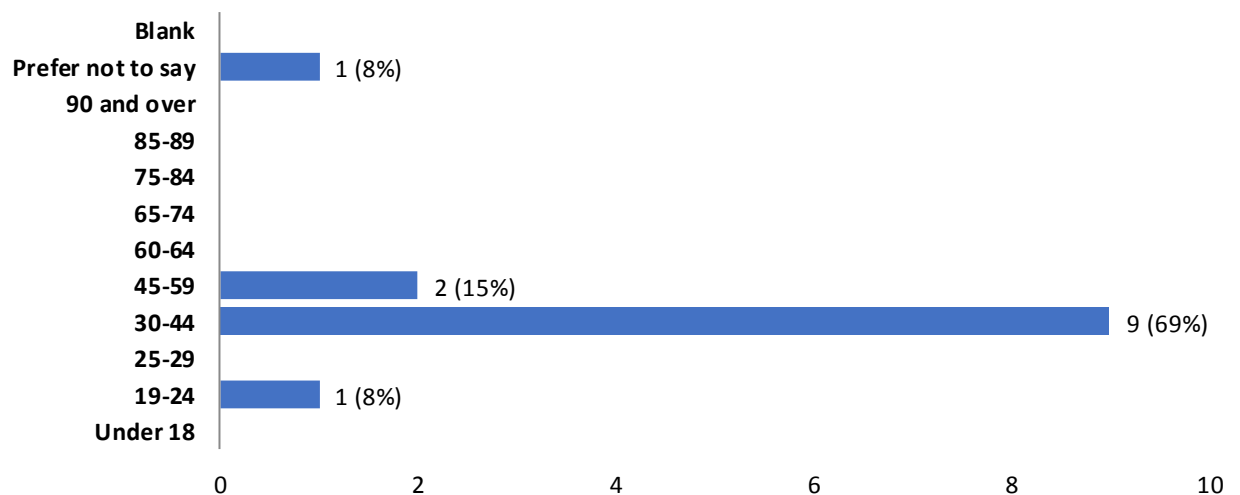
Source: Haringey Education Service 2019



The most popular postcode for respondents was N15 (5) followed by N16 (2), N8 N4, E2, SW19 and N1 (all 1).

Question 6 - What is your age group?

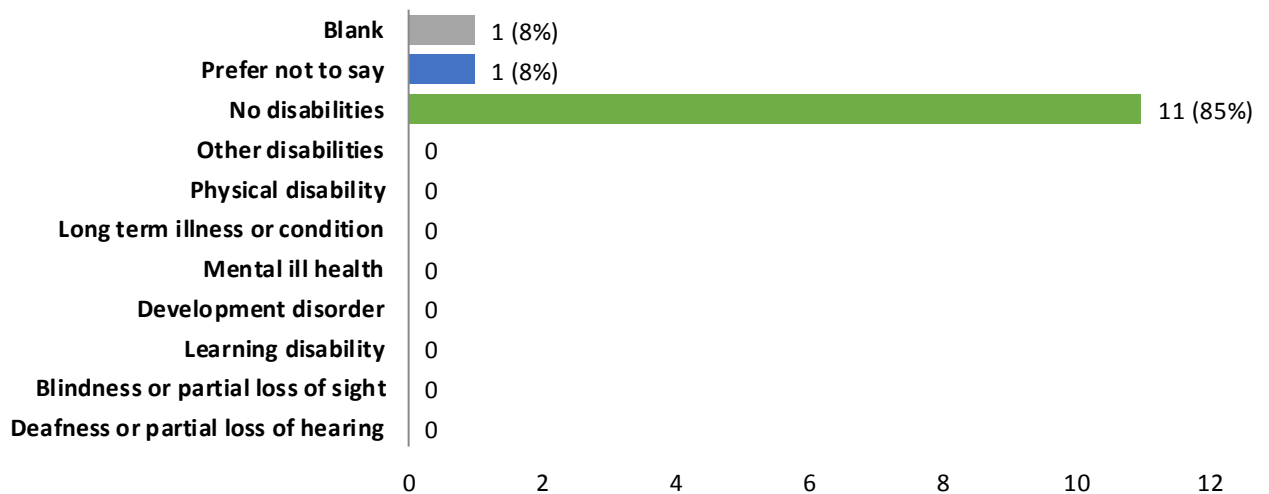
Source: Haringey Education Service 2019



The most popular age group for respondents is 30-44 (9) followed by 45-59 (2).

Question 7 - Do you have any of the following conditions which have lasted or are expected to last for at least 12 months?

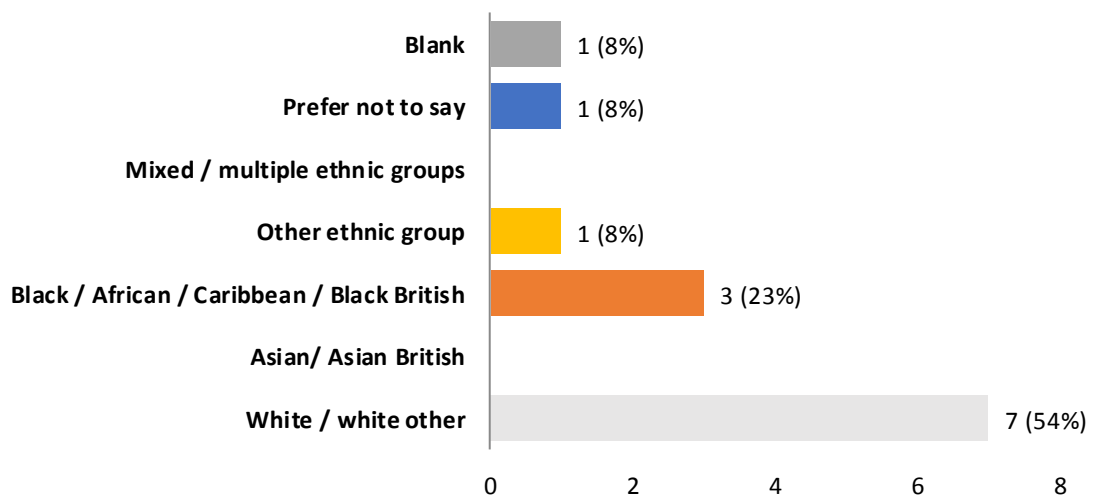
Source: Haringey Education Service 2019



11 of the respondents have no disabilities, 1 preferred not to say and 1 left the question blank.

Question 8 - Please indicate your ethnicity

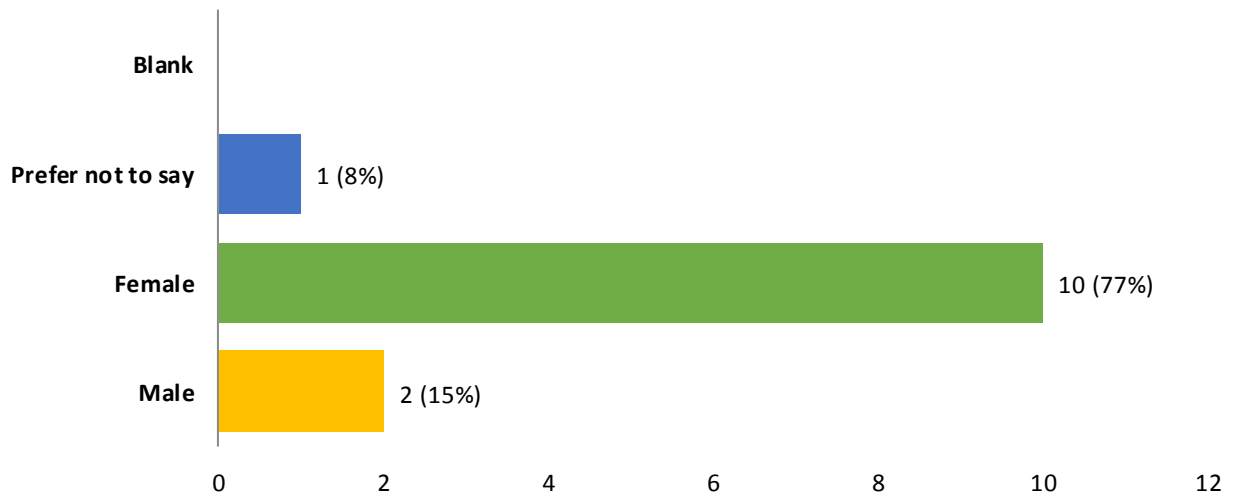
Source: Haringey Education Service 2019



7 respondents classified their ethnicity as White / White Other whilst 3 as Black / African / Caribbean / Black British and 1 as other ethnic group.

Question 9 - What is your gender?

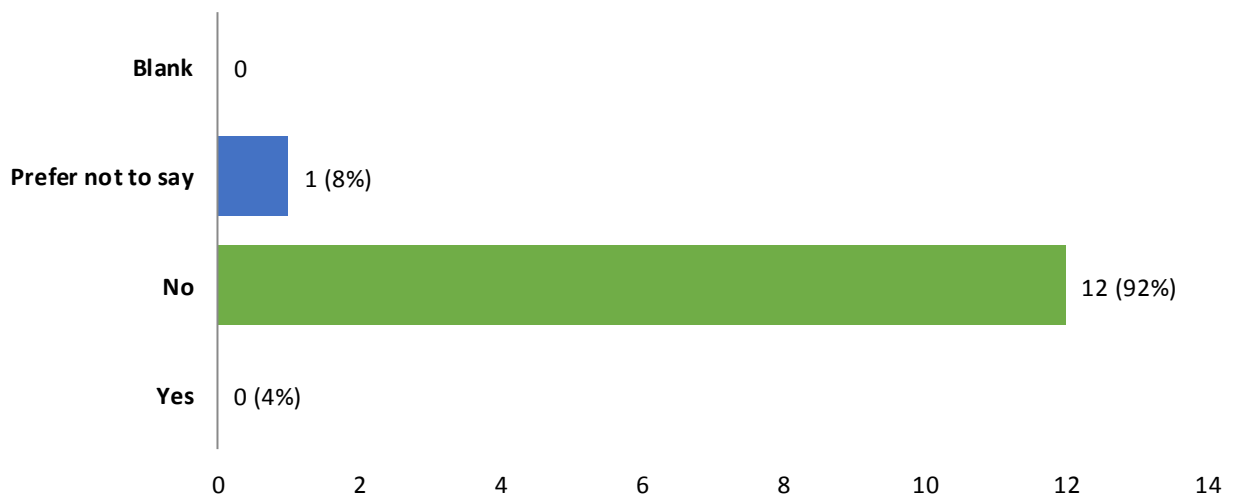
Source: Haringey Education Service 2019



10 respondents are female, 2 male and 1 preferred not to say.

Question 10 - Does your gender differ from your birth sex?

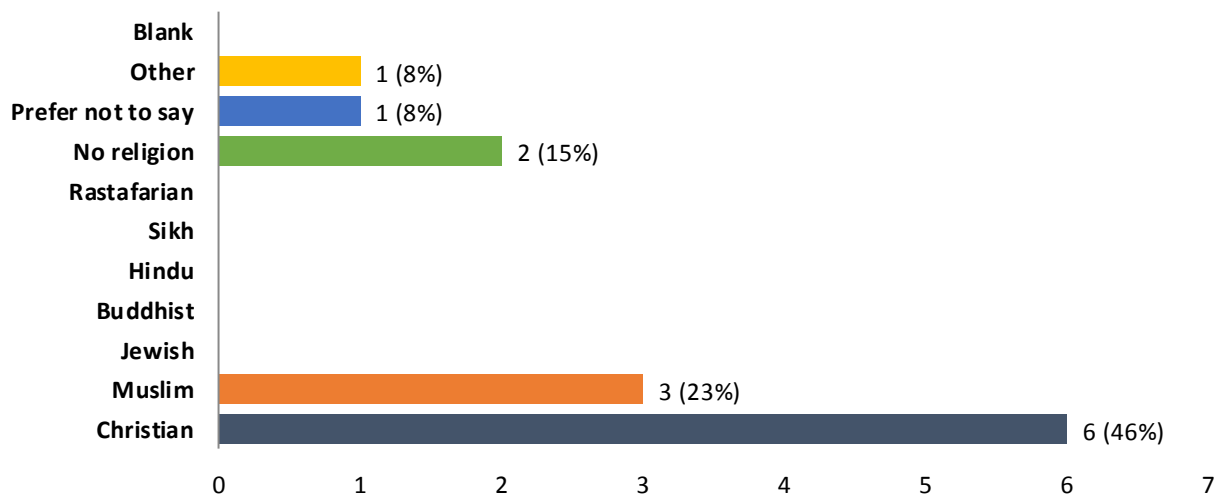
Source: Haringey Education Service 2019



12 respondents do not have a gender different from their birth sex whilst 1 preferred not to say.

Question 11 - Do you have a religion or belief that you would like to mention?

Source: Haringey Education Service 2019

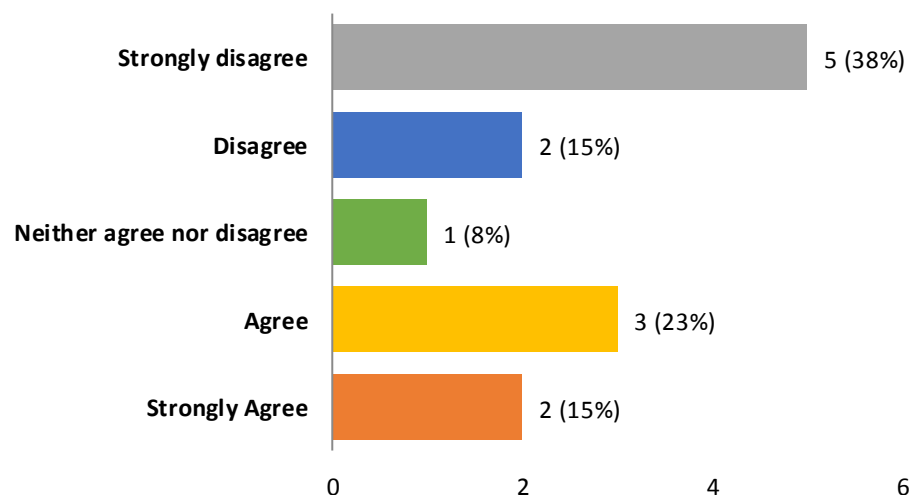


6 respondents have a religion or belief classed as Christian, 3 as Muslim, 2 have no religion and 1 answered other and another preferred not to say.

4. Survey analysis

Question 1 - To what extent do you agree or disagree with the proposal to amalgamate Stamford Hill primary school and Tiverton primary school?

Source: Haringey Education Service 2019



Question 1 – To what extent do you agree or disagree with the proposal to amalgamate Stamford Hill Primary school and Tiverton Primary School?

Some 5 respondents agreed or strongly agreed with the proposal to amalgamate Stamford Hill Primary school with Tiverton Primary School whilst 7 respondents disagreed or strongly disagreed.

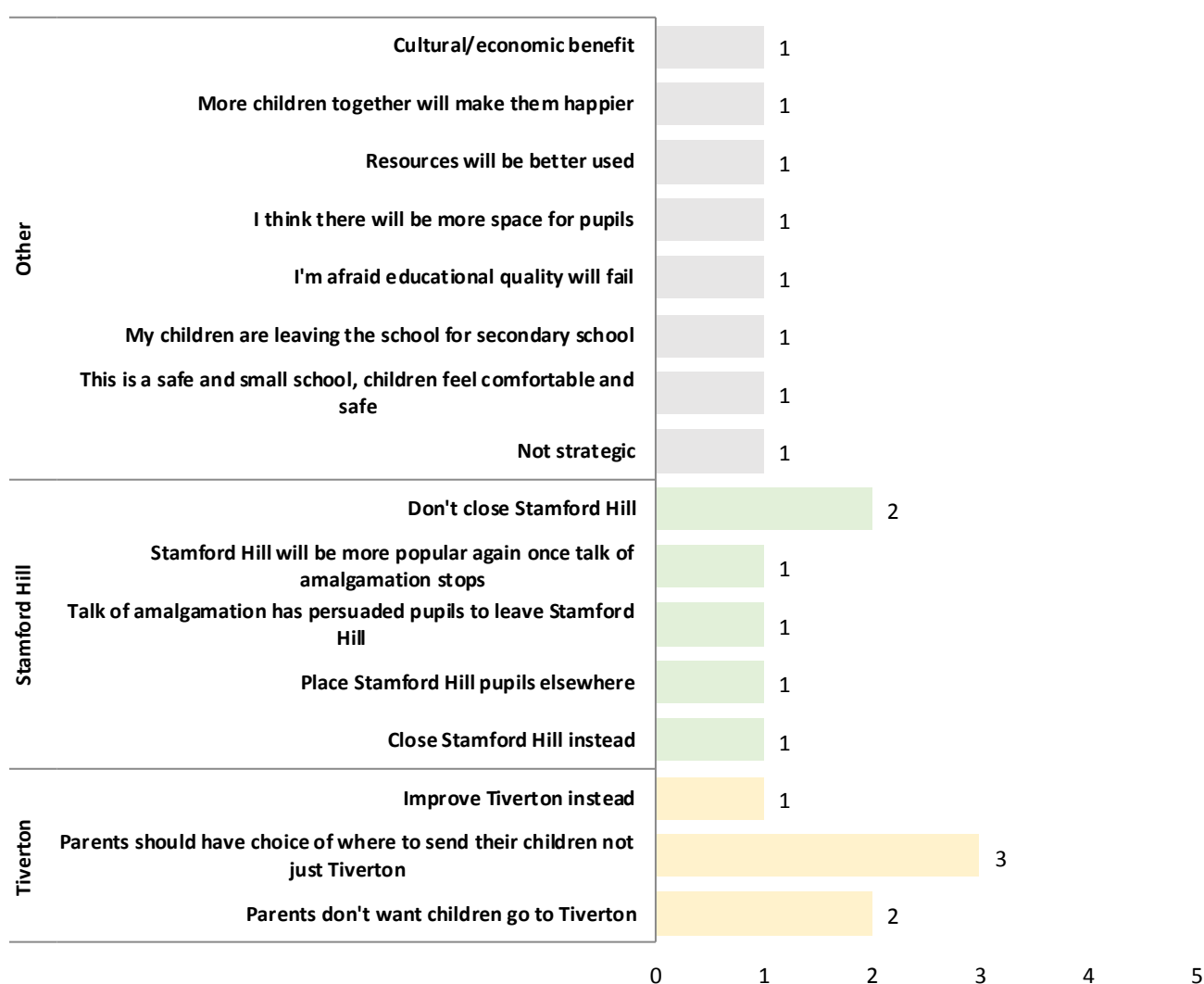
Question 2 – Please expand on the reason for your answer to Q1 below

The analysis below has been simply characterised into 3 categories, issues directly concerning Tiverton Primary School, issues directly concerning Stamford Hill Primary school and Other.

Due to low response rates only a few answers have been considered thematically such as “Parents should have choice of where to send their children not just Tiverton” (3). Most are single responses.

Question 2 - Please expand on the reason for your answer to Q1 below

Source: Haringey Education Service 2019



5. Officer's response to the points raised by individuals not in favour of the proposal

The section below attempts to provide a response to some of the concerns raised by respondents about the proposed amalgamation.

Other:

"I'm afraid education quality will fail"

Officer's response: The main reason for seeking an amalgamation is to ensure educational resources are sufficiently funded through the adequate level of pupil funding. This is directly related to the number of pupils so a school with falling rolls (such as Stamford Hill) will struggle to maintain education quality or in the long-term remain financially viable. Amalgamation will improve funding and educational quality.

"This is a safe and small school, children feel comfortable and safe"

Officer's response: Tiverton Primary School is a safe and comfortable setting for a primary school. The new Tiverton school established through an amalgamation will continue to be a successful 2 form entry primary school.

"Not strategic"

Officer's response: This respondent suggested it would have been better to consult solely on the closure of Stamford Hill instead of amalgamation. Amalgamation was chosen because it was felt more prudent to partner with a close and successful primary school to ensure that, wherever desired, pupils and parents have the opportunity to maintain friendship groups and attend the next closest primary school.

Stamford Hill:

"Don't close Stamford Hill"

Officer's response: Unfortunately, the recent and sustained fall in birth rates and out migration has made it inevitable that the supply of local school places has to be constrained. Amalgamation is seen as the best way of achieving this aim and enhancing local educational resources.

"Stamford Hill will be more popular again once talk of amalgamation stops"

Officer's response: Popularity of local schools is less important than the demographic reality of fewer children. The latest birth data from the Office for National Statistics continue to show a drop in birth rates and pupils on roll at Stamford Hill have now dropped to below 100 where the school has a capacity for 210.

"Talk of amalgamation has persuaded pupils to leave Stamford Hill"

Officer's response: Pupil rolls have been low for a number of years at Stamford Hill prior to the start of the amalgamation process.

"Place Stamford Hill pupils elsewhere"

Officer's response: As outlined above we felt it most prudent to guarantee all Stamford Hill pupils a place at their closest primary school which is Tiverton. However, this in no way impacts the opportunity for parents and carers of children at Stamford Hill to apply for any other Haringey primary school. Many schools in the local area are carrying a high number of vacancies which means that an alternative local school can be offered to any family that wants one. All Haringey schools in the area are judged by Ofsted to be 'Good' or 'Outstanding.'

"Close Stamford Hill instead"

Officer's response: This is part of the "Not strategic" response mentioned above. Please see response to that question as to why it was felt that amalgamation was the best available option.

Tiverton:

"Improve Tiverton instead"

Officer's response: The main issue here is not about educational standards at Tiverton but the demographic reality of fewer children and lower birth rates.

"Parents should have choice of where to send their children not Tiverton"

Officer's response: They do. Parents and carers of children attending Stamford Hill are guaranteed a place at Tiverton. However, this in no way affects the opportunity for them to apply to any other Haringey primary school.

"Parents don't want their children to go to Tiverton"

Officer's response: Many pupils have already transferred from Stamford Hill to Tiverton. But we understand that parents and carers may wish to apply to other Haringey (and indeed out of borough) primary schools and they are free to do so.

Actual responses to Question 2 – Please expand on the reason for your answer to Q1

Note: No adjustments to spelling or grammar has been made. Some responses have been translated using Google language.

With the falling pupil numbers at Stamford Hill I feel that an amalgamation is not the most strategic move. A lot of the parents do not want their children to go to Tiverton, and I feel that a measured approach to providing pupils with places at various schools would be in the interest of the pupils. With regards to staffing, Tiverton already has a fully functioning staff body. By following the legal amalgamation process, it will cause unrest at Tiverton and seems like an unnecessary approach (especially when you take into account that most of the teachers at SH are agency or on fixed term contracts). In this instance, closing SH, and placing the pupils elsewhere seems like the most sensible course of action. Parents, staff and stakeholders have been told that the school will remain open to complete the 2019/2020 academic year. Any move to shorten this time would be unethical.
Once this issue of amalgamate is off more parent will bring their children back to Stamford Hill Primary school. There will be newcomer as well. The news of joining two schools together had caused more pupils to leave the school. I believe Stamford Hill Primary school will be normal again.
Because resources are better used, be they materials, and children are happier because they will be more; and there is cultural and economic benefit, because together they can be sustained.
Parents should have a choice where they send their children. If they wanted to send their child to Tiverton they would have! They should be given the choice of other schools in the borough and help in doing so.
We don't want it to be closed. If an old school is developed a little more, it can give better education in the education program.
We like it because it is a small school children feel comfortable, confident and safe.
Next year my son goes to high school.
I'm afraid education quality will fail.
I think there will be more space for pupils.

Appendix 2

Title: Responses to the pre-consultation and consideration of representation

1.1 **52** individual responses were received to the consultation (**23** by post, **18** by online survey and **11** by email). These responses included **23** parental/carer responses. There were **6** responses from staff (teaching staff), **2** from Governors, **6** from Haringey employees, **1** from a Headteacher, and **14** responded 'Other'. Those who responded 'Other' included an Assistant Headteacher, local residents, a Deputy Headteacher, a nursery nurse, a Unison rep, a School Business Manager and Year 6 pupils.

1.2 **Responses to Q1** - Of the 52 individual responses, **19** (37%) **agreed** with the proposal to amalgamate the schools whilst an equal proportion **strongly disagreed** with the proposal. Taken together some **27** respondents (52%) **disagreed or strongly disagreed** whilst **21** (41%) **agreed or strongly agreed**. Some **4** respondents (8%) **neither agreed nor disagreed**.

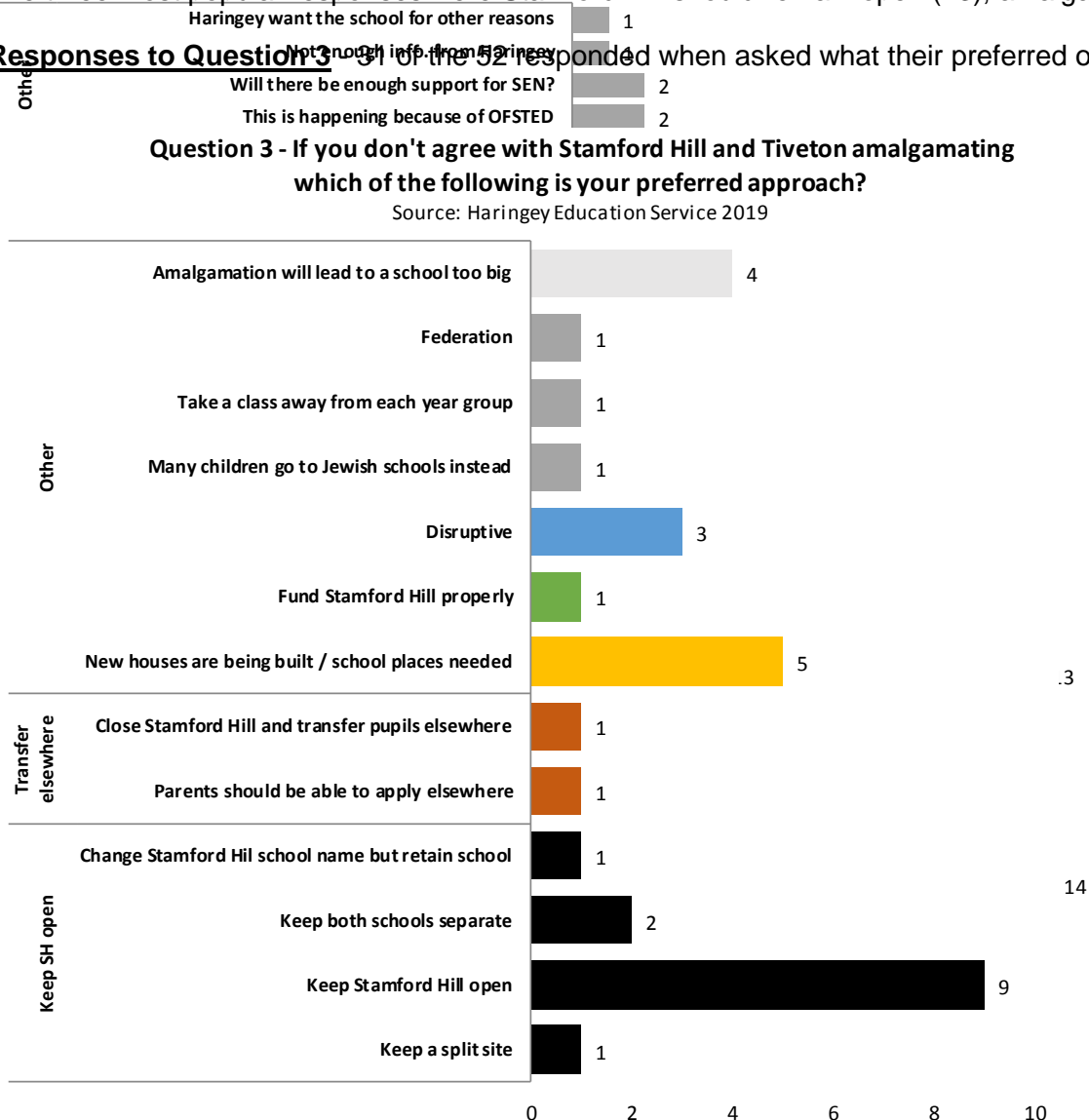
1.3 **Responses to Q2** - 26 of the 52 responded when asked to expand on their reasons for agreeing or disagreeing with the proposal to amalgamate. These have been grouped into these shown in the diagram below.

1.4 The most popular **Question 2** was **agreed** the merger is important for a new amalgamation (shown in grey above)

Source: Haringey Education Service 2019

1.5 The three most popular responses were Stamford Hill should remain open (13), amalgamation should

1.6 **Responses to Question 3** - 31 of the 52 responded when asked what their preferred option was if the



- expand on views already expressed.
- 1.7 A response was received by email from the Chair of Governors at Tiverton Primary School on behalf of the Leadership and Governing Body, which set out the governing body's view of the support and the steps that would be required to 'make this work for the children'. Points raised in this response are summarised in the table under Item 1.13 below.
- 1.8 Neither of the Governing Bodies of the relevant schools have opposed the proposed amalgamation.
- 1.9 As part of the pre-consultation process, public meetings were held at Stamford Hill Primary on 3 April 2019 and Tiverton Primary School on 25 April 2019. Approximately 50 people attended the first public meeting at Stamford Hill Primary and approximately 30 attended Tiverton Primary. The number of parent/carers estimated to be at the meeting was 40 and 20, respectively.
- 1.10 The views expressed at the public meeting broadly reflected those of the written responses. A recurrent question posed by parent/carers related to whether places would be guaranteed for displaced pupils. It was made clear that places at the new primary school would be guaranteed to all families that wanted one if amalgamation were to go ahead.
- 1.11 The following table lists a summary of comments that were received during the consultation together with responses from LA Officers. All individual and collective responses are available for Cabinet members to inspect at Appendix 3
- 1.12 Summary of the points raised by respondents

<p>Summary of points raised by Tiverton Primary School - Headteacher, Chair of Governors, Senior Leaders and others</p>
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- | |
|--|
| <ul style="list-style-type: none"> • Responses from Tiverton Primary School were in favour of the proposal; however, assurances were sought that additional financial support and resources would be provided to ensure the best possible outcomes for the new school community. • The Headteacher of Tiverton Primary School stated that she was "confident that appropriate resourcing by the Local Authority, together with the dedication and resilience of the Tiverton team will serve to support a highly successful amalgamation." • The Chair of Governors echoed the Headteacher's remarks and emphasised that the school's deficit budget had significantly reduced as a result of efficiency savings. She sought assurances on behalf of the Governing Body and Leadership team that the school budget would not be detrimentally impacted. Concerns largely centred on financial pressures and the impact on standards if amalgamation were to go ahead. |
|--|

The Governing Body of Tiverton request funding under the following categories, which they believe to be the areas of focus crucial to a successful amalgamation:

Premises

- | |
|---|
| <ul style="list-style-type: none"> • Funding for bulge classes in the event that the school is required to admit additional children above a PAN of 30 or 60 as appropriate. • Split site funding in the event that the school has to operate on two sites temporarily. |
|---|

- Resources made available for patrol crossing before and after school.

Performance and standards

- Funding to support children achieving less than the expected level of attainment.
- Funding to support children with SEND who may require accelerated learning and support for fast track assessments.

Officer's response to the points raised by Tiverton Primary School - Headteacher, Chair of Governors, Senior Leaders and class teachers

The concerns raised above have been acknowledged. The deficit budget at Stamford Hill Primary School has significantly reduced and it would not transfer to the new primary school established through an amalgamation. Any remaining deficit at Stamford Hill would be borne by the Local Authority ahead of any amalgamation.

Premises

As set out in paragraphs 5.18 and 5.19 above, Tiverton Primary School currently has the capacity to absorb the vast majority of pupils from Stamford Hill Primary. A programme of capital works may be required to accommodate additional pupils; however, it is also expected that a small minority of families from Stamford Hill will transfer to alternative schools leaving more capacity within the current structure.

Any enlargement and/or significant alternation of Tiverton Primary School is, therefore, not likely to be required. The Council is committed to working closely with Tiverton Primary to maximise its available space so it can continue to ensure the successful learning of all pupils. Any bulge classes required to accommodate additional pupils above PAN will invite Growth Fund payment.

A temporary split-site scenario may be in operation from September 2020, although further modelling is in progress to see if and how this might be achieved and to allow for onsite provision at Stamford Hill Primary to continue where needed. Haringey's local authority formula currently includes a factor to provide additional funding to schools that operate on more than one site.

Performance and Standards

It is recognised that one of the most important concerns is the impact of the amalgamation on standards. Amalgamation should lead to a single primary school with an uninterrupted and consistently high standard of teaching and support for pupils. Lump sum funding will be made available as appropriate to ensure that the new school established through an amalgamation will provide a rich and engaging curriculum and opportunities for pupils to achieve high standards in their learning.

The National Funding Formula **currently** includes provision for the payment of a lump sum to schools that are amalgamating. The relevant paragraphs in the **2019/20** school's revenue funding operational guide which set out how the lump sum is to be calculated where schools amalgamate are detailed below.

Paragraphs 41 of the attached Schools Revenue Funding 2019-20 Operational Guide (updated December 2018) provides that where schools have amalgamated after 1 April 2019. e.g. 1 September 2019, in the first year of the amalgamation the funding the new school would receive for the remaining 7 months of the year from

1.9.2019 up to 31.3.2020 via the lump sum element of the funding formula is the sum of the separate schools' funding for the remainder of that year, which is the same as the 2 schools would have received separately for that period up to 31 March 2020.

After the first 7-month period, the provision for the next financial year (2020/21) would reduce to 85% of the predecessor schools' lump sums. Paragraph 41 provides some discretion as to the level of lump sum that can be paid to an amalgamating school in the third financial year of its operation. However, this would require an application by the Council to the Education & Skills Funding Agency (ESFA) giving an explanation for the level of discretionary protection being requested by the Local Authority. ESFA does not expect the level of discretionary protection to exceed 70% of the combined lump sums.

It should be noted that the funding factors and values in the National Funding Formula are subject to review by the ESFA and could differ in 2020/21 (when the amalgamated primary school would be expected to open if amalgamation were to go ahead) and 2021/22. The level of local discretion available to the Council and Schools Forum to set local funding factor values may also change over the period. This could affect the funding allocated to the amalgamated school under the Funding Formula applicable in the relevant financial year.

Summary of main points raised by individuals not in favour of the proposal

Housing and development

- "There is going to be a massive development on the St Ann's Hospital site which will increase the number of families looking for schools in the area."
- "There is always a great need for school places and with new developments being built all over the area. New families moving into the area"
- "Number of students falling? but there are more than 700 homes being built around the school, have you considered of how many children are going to come and live with their families in these new homes? Schools will be needed."

Disruption and separation of children

- "Tiverton Primary school already have two classes per year. My daughter wouldn't thrive in such big numbers."
- "I want my child to continue at this school"
- "Because you do not want there to be enough space for all the children of Stamford Hill and if there was, it would be an all-encompassing school and I would not say that there is a good education. Send children on the waiting list of the most important schools. Give the teachers stability. Promote the school. When the Stamford Hill school goes ahead with their children and they are very happy there and the change and I think it will unsettle the."
- "It is because they will separate the friendship of the kids. It will complicate the children with their friends."

Demand for school places

- "I'm assuming this is a big Jewish area and families are choosing Jewish schools over regular state primary schools?"
- "First, I do not agree with the school the Tiverton is not adapted for what they intend to do, and it is too small for this project."
- "Stamford Hill has provided for many generations. If numbers are falling, then

surely if teaching improves, greater numbers will apply. It seems a great waste of a public school when other areas in London have a very small amount of spaces. This is a much better site also. Why not keep this site open and not close?"

Funding and performance and standard of teaching

- "I prefer Stamford Hill to remain open to get the funds that they need."
- "Stamford Hill will fill the gap that is short in the school. The teachers and headteacher will fill the shortage in the school. They will be more parents that would like to register their child at Stamford hill Primary School."

Officer's response to points raised by individuals not in favour of the proposal

Housing and development

The development at the St Ann's hospital site has yet to commence and is unlikely to add any additional demand for local school places until 2021/22 at the very earliest. All planned developments, including child yield arising from the development(s) are accounted for in our school roll projections, and we do not project that numbers of children in the local area are likely to increase significantly in the near future, to lead to increased pupil numbers at schools. An amalgamation will provide a long-term sustainable solution to falling local demand.

Disruption and separation of children

The Council is committed to providing a stable transition and ensuring cohorts of children are, as far as reasonably possible, kept together. Places at the new primary school established through the potential amalgamation will be guaranteed to all families that want one.

If amalgamation were to go ahead, an admissions process enabling families to apply to alternative schools would be implemented prior to the establishment of the new school in September (from May 2020). The Council recognises that keeping siblings together for families that apply for other schools will also be critical as siblings who are close in age may benefit from having each other at the same school to offer social and emotional support at a new school.

Parent/carers will have a right to express a preference for any school and, in the case of community and voluntary controlled schools, the relevant Local Authority is the admissions authority and will meet that preference provided there are vacant places or the school is happy to admit above the published admission number. In the case of Voluntary Aided (VA) schools and Academies, the Governing Body decide the conditions for admission to their particular school.

The majority of local schools (Community, VA and Academies) in PA3 currently have vacancies and will still be expected to do so when an admission process opens in May 2020 due to the projected lack of demand. This means that an alternative local school can be offered to any family that wants one. Moreover, all Haringey schools in the area are judged by Ofsted to be 'Good' or 'Outstanding' and will provide pupils with high educational standards.

Demand for school places

In response to the points raised, a lack of demand in the local area is not due to

families transferring to independent Jewish schools and pupil number are also not expected to increase unexpectedly from improvement in standards. The lack in demand for school places is due to a flattening birth rate and a higher than projected increase in outward migration. This has contributed to a high surplus of places with current projections showing a consistent surplus of approximately one form of entry in PA3 up until 2026/27.

Appendix 3

Report for: Carlo Kodsi, Head of Admissions, Education and School Organisation

Title: Pre-consultation on the options for the future of Stamford Hill Primary School

Lead Officer: Nick Shasha (School Place Planning Lead), 020 8489 5019
nick.shasha@haringey.gov.uk

1. Aim of paper

- 1.1 This appendix provides analysis and pictorial representation of the responses from the recently undertaken pre-consultation consultation on the options for the future of Stamford Hill Primary School.

2. Background

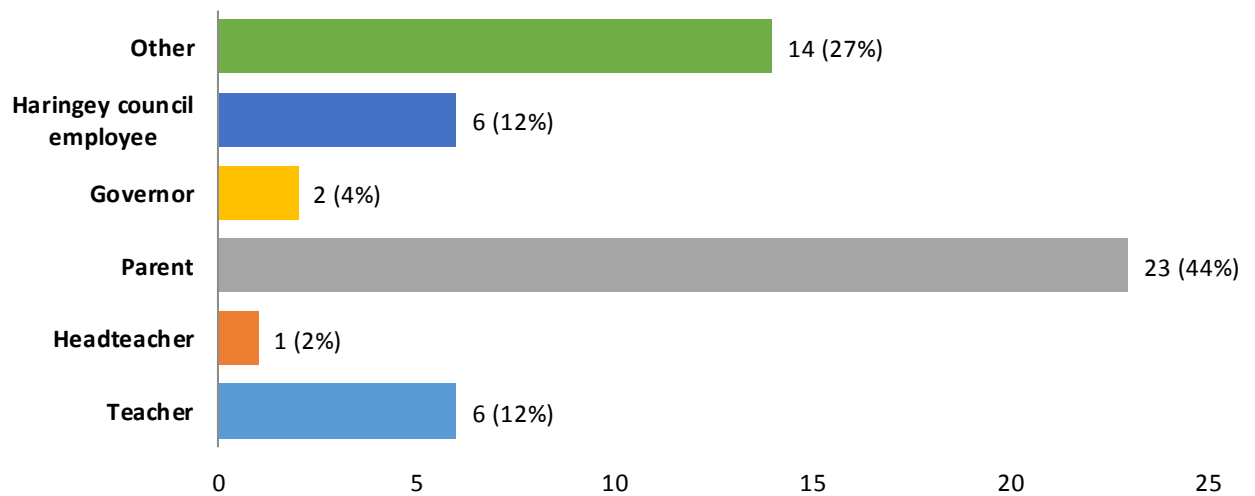
- 2.1 Stamford Hill Primary School is a one-form entry school located on Berkeley Road, London, N15 6HD. As a one form entry school Stamford Hill Primary School has the capacity to admit up to 30 pupils in its year of entry (Reception).
- 2.2 In recent years there has been a gradual decline in pupils on roll at Stamford Hill Primary and other local schools. It is predicted that falling rolls will continue until 2026/27 or beyond. The Council is concerned that continued falling rolls will impact significantly upon the financial sustainability of the school and, in turn, its ability to raise the standards of student achievement.
- 2.3 In March 2019 Council's Cabinet agreed to carry out a pre-consultation consultation to gather views from local stakeholders on the options for the future of Stamford Hill primary school, including the preferred option of establishing a new primary school through an amalgamation between Stamford Hill and Tiverton primary schools.
- 2.4 Tiverton Primary is the closest Primary school to Stamford Hill Primary, located immediately opposite on the other side of Seven Sisters Road. Tiverton Primary is a 2-form entry school that has also experienced falling rolls and currently has some spare capacity. The Council's preferred option is for the two schools to be brought together in an amalgamation to provide a long-term solution to declining local demand for school places.
- 2.5 As part of the pre-consultation survey we asked local stakeholders their view on to what extent they agreed with this proposal and, if they disagreed, what their preferred option might be based on several other considerations.

3. Response number and respondent characteristics

A 6-week non-statutory consultation ran between 27 March and 8 May 2019. Some 52 responses were received during this period. Respondent characteristics are shown below:

Question 4 - Please tell us who you are? (tick all that apply)

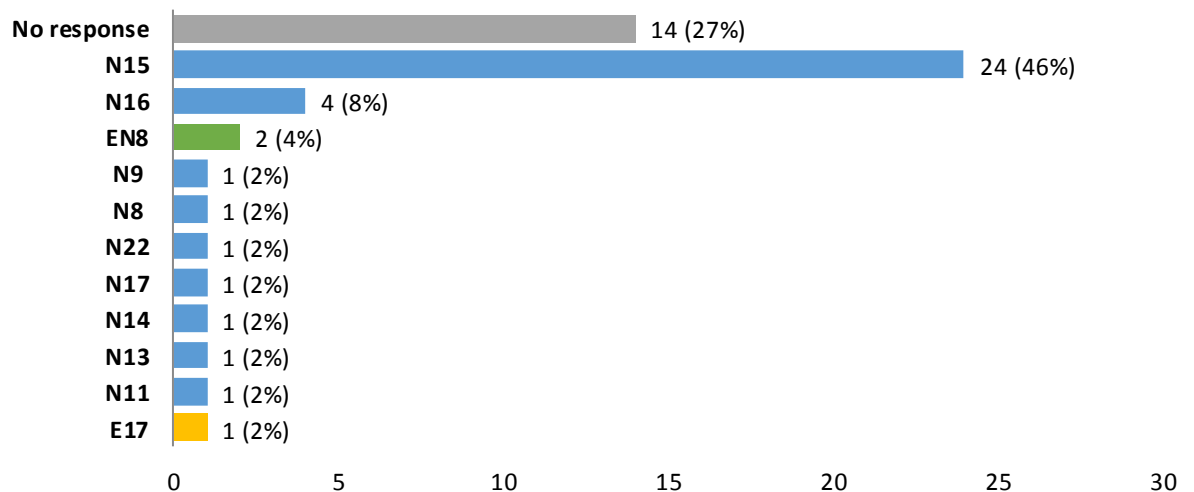
Source: Haringey Education Service 2019



Those who responded Other included Assistant Headteacher, local residents, Deputy, nursery nurse, Unison rep, school business manager and Year 6 pupils.

Question 5 - What is your full post code?

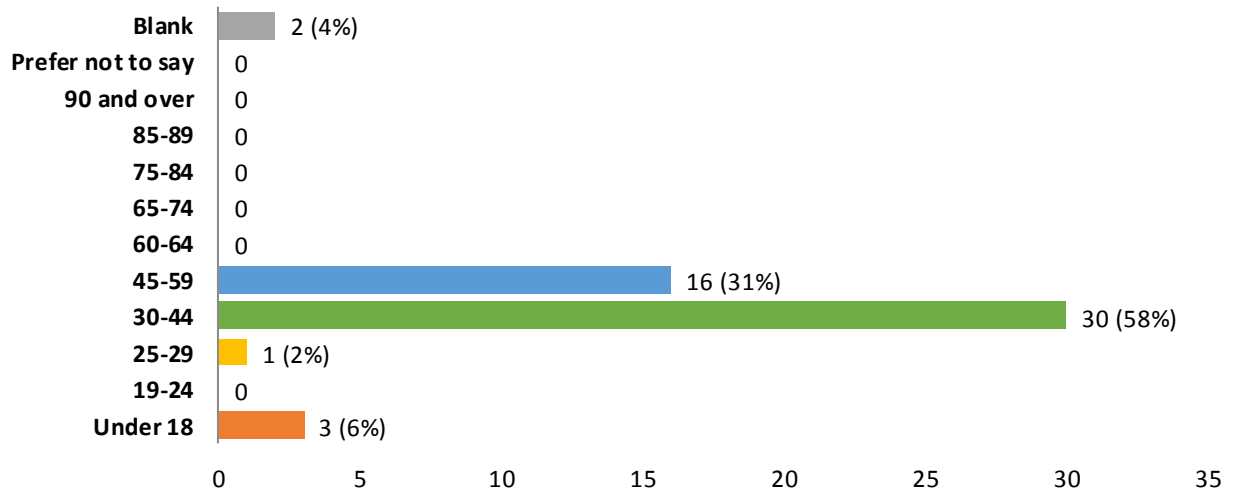
Source: Haringey Education Service 2019



The most popular postcode was N15 (24 or 46%) of respondents followed by N16 (4 and 8%).

Question 6 - What is your age group?

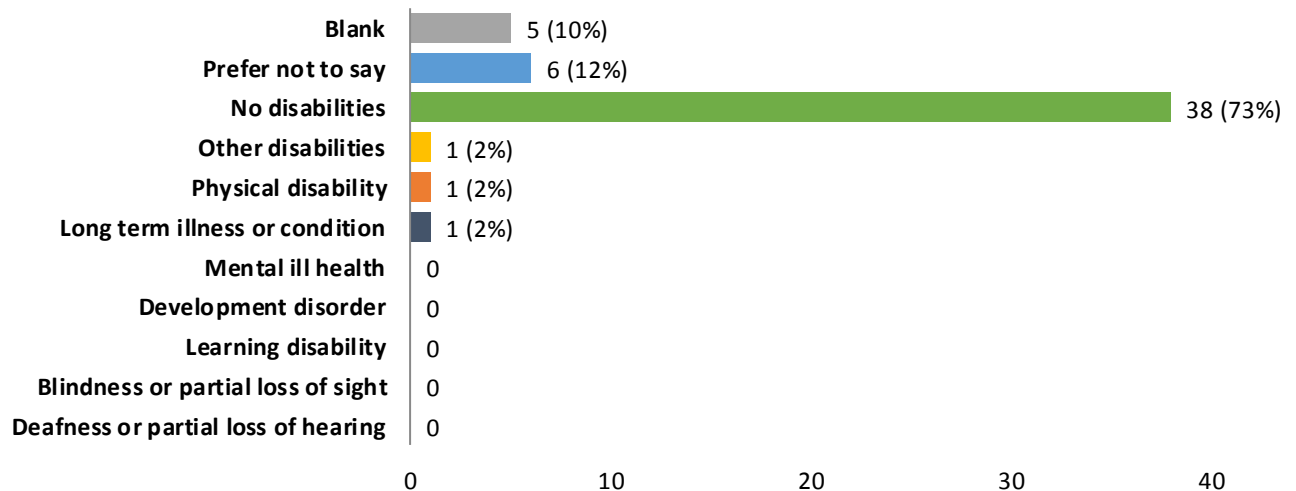
Source: Haringey Education Service 2019



The most popular age band of respondent was 30-44 (30 or 58%) followed by 45-59 (16 or 31%).

Question 7 - Do you have any of the following conditions which have lasted or are expected to last for at least 12 months?

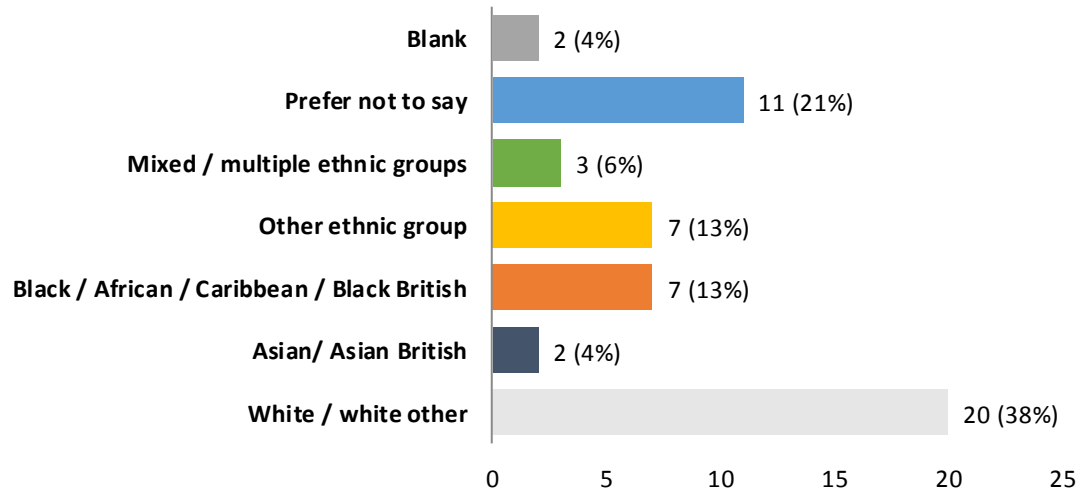
Source: Haringey Education Service 2019



The majority of respondents have no disabilities (38 or 73%). 6 (or 12%) preferred not to say whilst 5 (10%) did not answer this question.

Question 8 - Please indicate your ethnicity

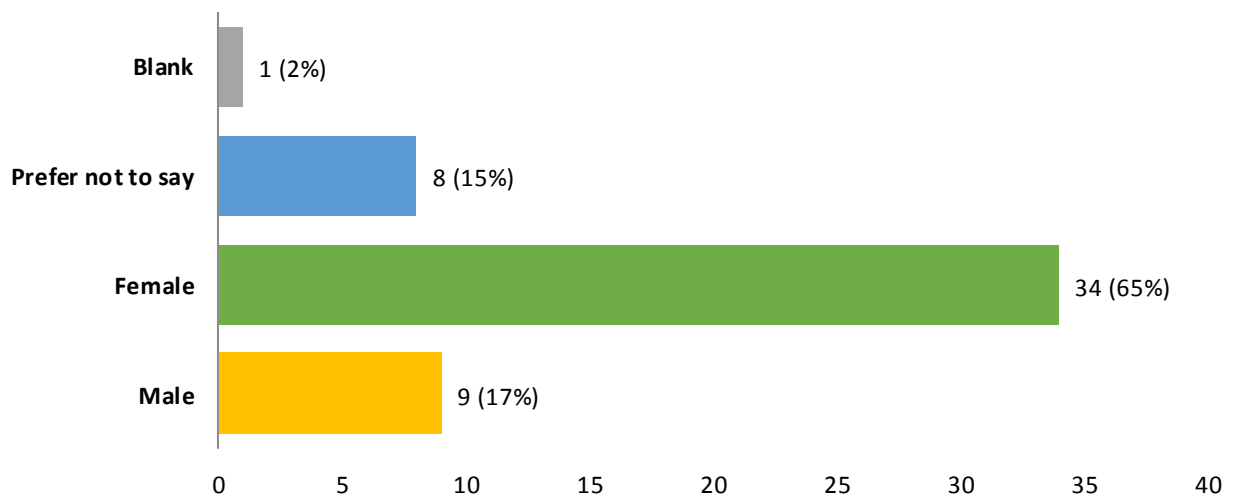
Source: Haringey Education Service 2019



The most popular ethnicity for respondents was White / white other (20 or 38%) followed by 7 (13%) each for Other ethnic group and Black / African / Caribbean / Black British.

Question 9 - What is your gender?

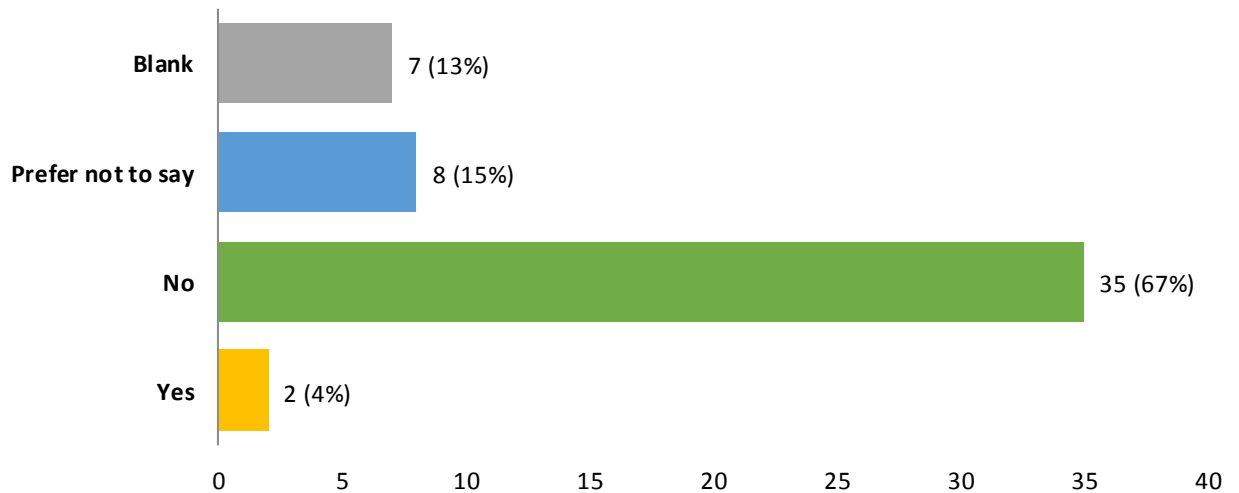
Source: Haringey Education Service 2019



Almost 2/3rds of respondents are female (34 or 65%) whilst 9 (17%) are male.

Question 10 - Does your gender differ from your birth sex?

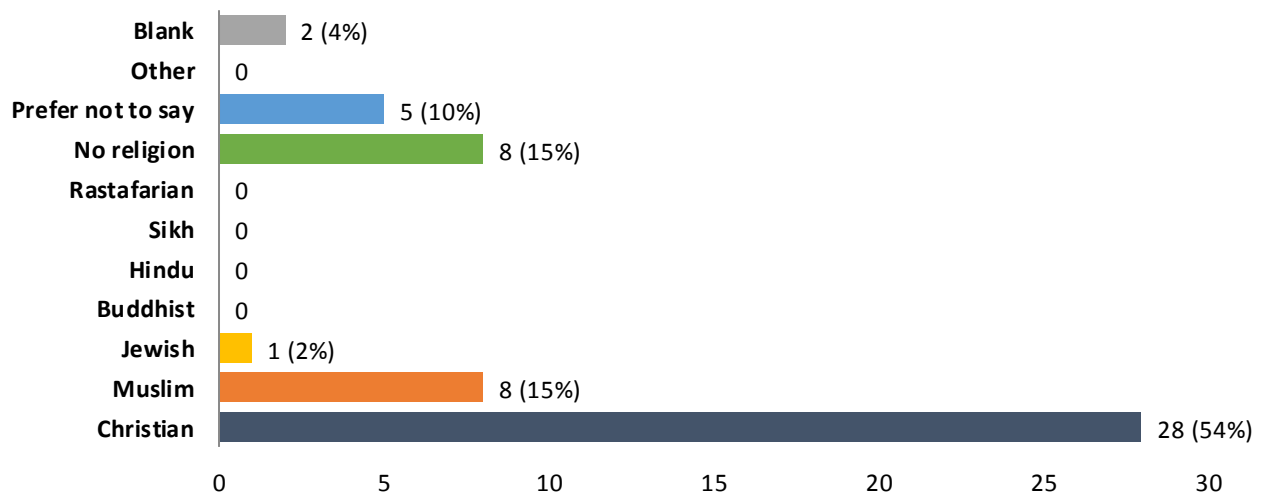
Source: Haringey Education Service 2019



Some 35 (67%) of respondents answered no to the question “Does your gender differ from your birth sex?”

Question 11 - Do you have a religion or belief that you would like to mention?

Source: Haringey Education Service 2019

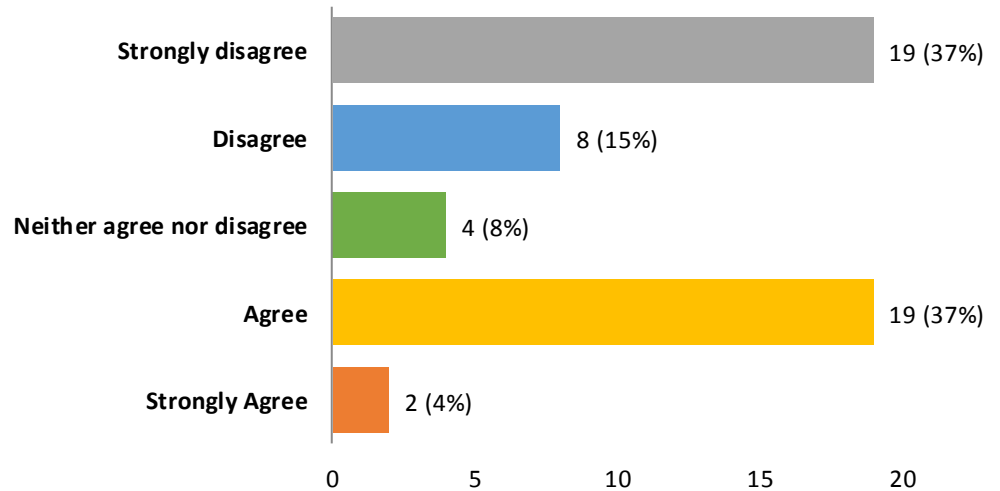


Just over half of respondents (28 or 54%) answered Christian whilst 8 (15%) stated No religion and 5 (10%) preferred not to say.

4. Survey analysis

Question 1 - To what extent did you agree or disagree with the proposal to amalgamate Stamford Hill primary school and Tiverton primary school?

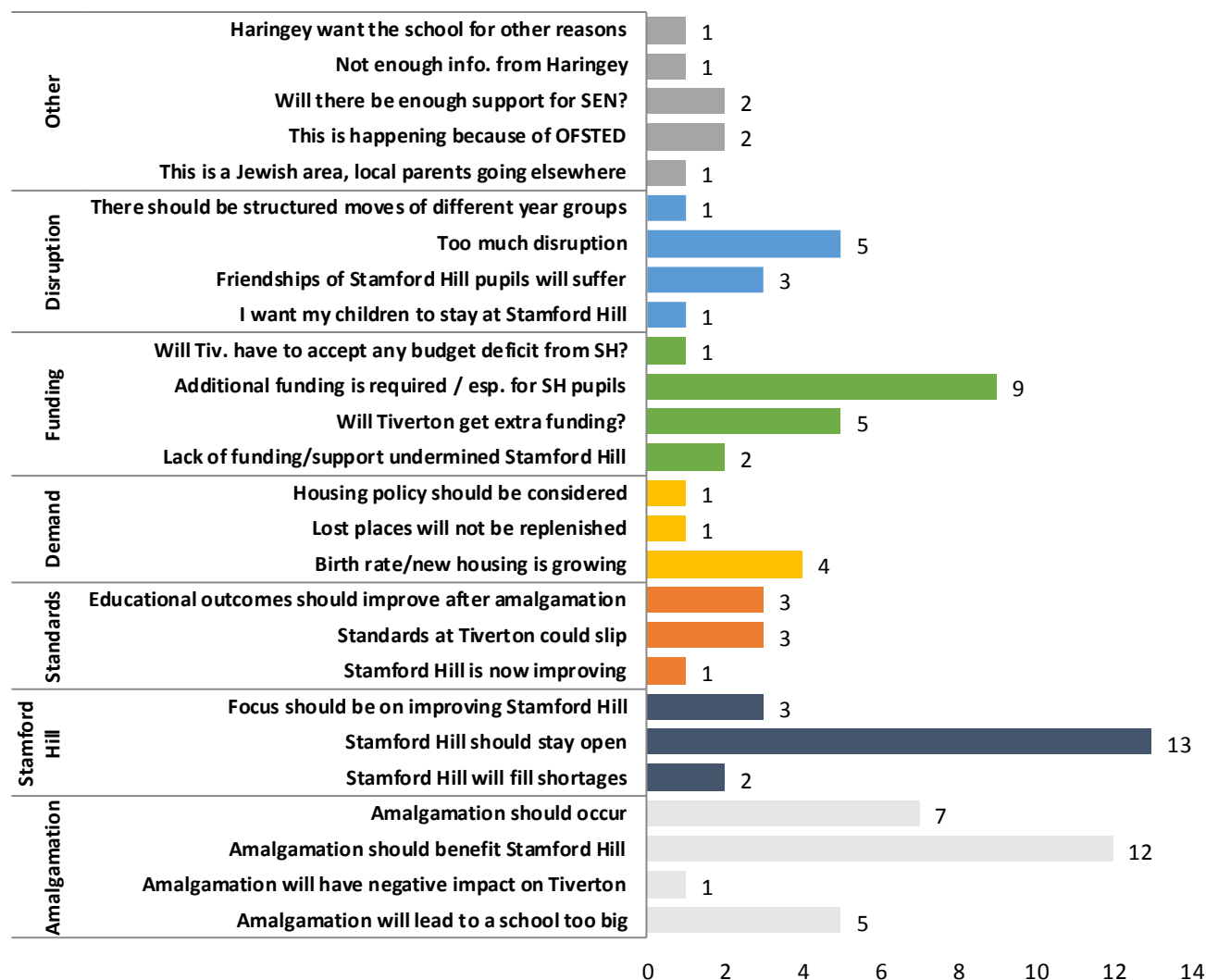
Source: Haringey Education Service 2019



Some 19 respondents (37%) strongly disagreed with the proposal to amalgamate Stamford Hill and Tiverton primary schools whilst an equal proportion agreed with the proposal. Taken together some 27 respondents (52%) disagreed or strongly disagreed whilst 21 (41%) agreed or strongly agreed. Some 4 respondents (8%) neither agreed nor disagreed.

Question 2 - Please expand on the reason for your answer to Q1

Source: Haringey Education Service 2019



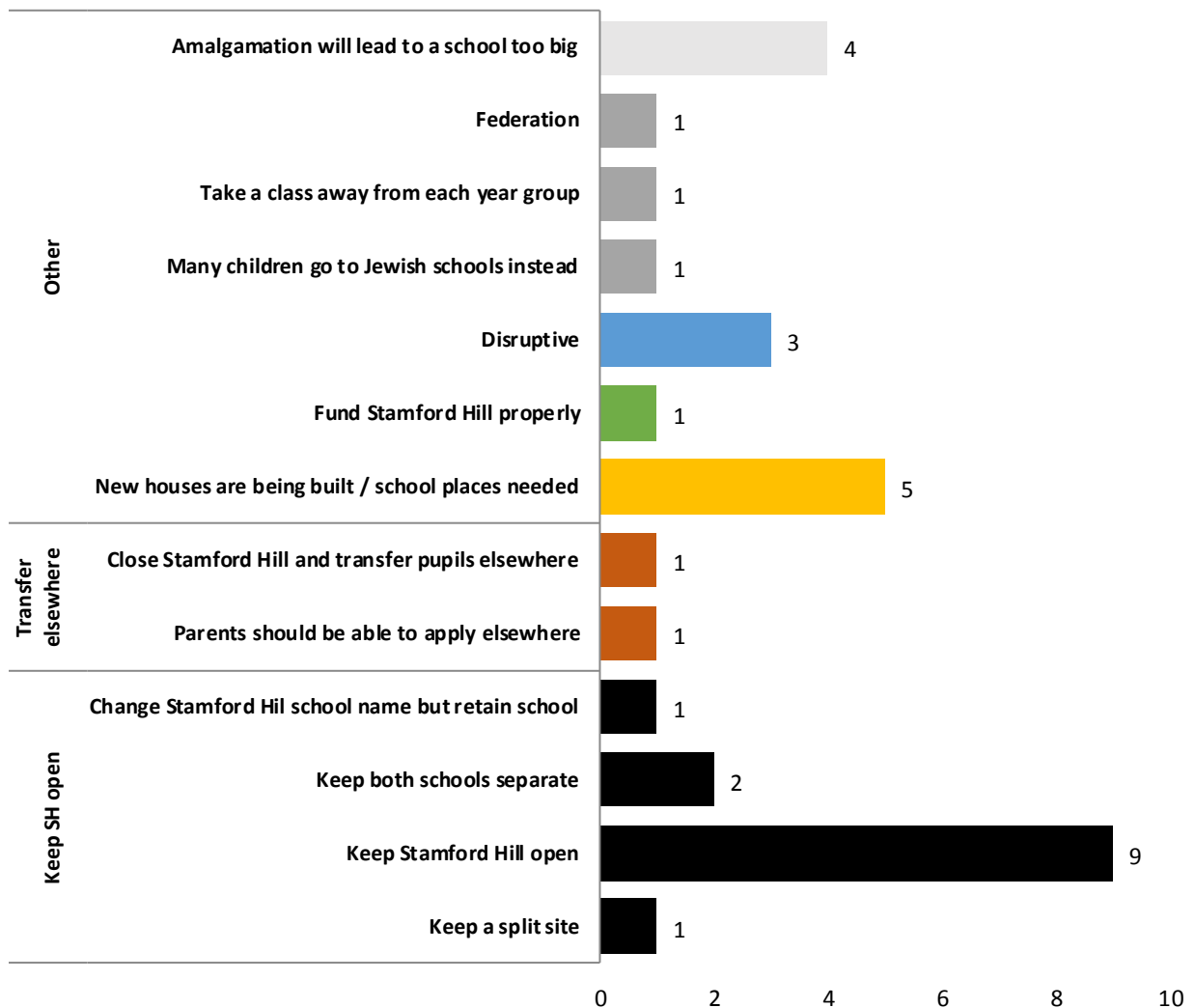
In analysing the responses to question some 26 issues were raised. For the sake of clarity these have been grouped, where possible into the themes shown above.

The most popular themes were around the immediate impact of amalgamation (shown in grey above) mentioned by 25 respondents, changes that could or should be made to Stamford Hill (shown in orange above) and issues relating to funding (shown in green above).

The three most popular responses were Stamford Hill should stay open (13), Amalgamation should benefit Stamford Hill (12) and additional funding is required especially for Stamford Hill pupils (9).

Question 3 - If you don't agree with Stamford Hill and Tiveton amalgamating which of the following is your preferred approach?

Source: Haringey Education Service 2019



Similar themes to question 2 were identified in question 3 and these have been identified above by colour. The most popular response was to keep Stamford Hill open (9 respondents) followed by a view that new housing is being built and school places will be needed (5) and that amalgamation will lead to a school that is too big (4).



5. Appendices

Please find a copy of the original survey form below and the open text responses to Questions 2 and 3 below this.

Consultation on the options for Stamford Hill Primary School

The Council is currently undertaking a public consultation to gather views on the future of Stamford Hill Primary School and this short survey has been designed to gather responses from all local stakeholders including parents, carers and staff. Tell us what you think by completing the questions below by **8 May 2019**.

Q1 To what extent do you agree or disagree with the proposal to amalgamate Stamford Hill Primary School and Tiverton Primary School?

- ☐ Strongly Agree
- ☐ Agree
- ☐ Disagree
- ☐ Strongly disagree
- ☐ Neither agree nor disagree

Q2 Please expand on the reason for your answer to Q1 below:

Alternative approaches

Q3 If you don't agree with Stamford Hill Primary and Tiverton Primary amalgamating which of the following is your preferred approach?

Please refer to the Frequently Asked questions for more information about each of these approaches

About You

Asking questions about you can help us improve the services we deliver to the community, monitor what different groups of people think about a particular service or issue and influence decisions that affect them.

The Data Protection Act 1998 sets out how Haringey Council Services must look after the information you share with us. Haringey Council Services will only use the information collected in this questionnaire to inform the redesign of services. We will not use your contact details when analysing consultation responses.

Q4 Please tell us who you are (tick all that apply)

- ☐ Teacher
- ☐ Headteacher
- ☐ Parent
- ☐ Governor
- ☐ Haringey Council employee
- ☐ Other

please _____
tell us: _____

What is your full post code?

Q5 _____

Age

Q6 What is your age group?

- ☐ Under 18
- ☐ 19-24
- ☐ 25-29
- ☐ 30-44
- ☐ 45-59
- ☐ 60-64
- ☐ 65-74
- ☐ 75-84



- ☐ 85-89
- ☐ 90 and over
- ☐ Prefer not to say

Disability

Under the Disability Discrimination Act a person is considered to have a disability if she/he has a physical or mental impairment which has a substantial and long-term adverse effect on her/his ability to carry out normal day-to-day activities. Since 2005, people with HIV, cancer and multiple sclerosis (MS) are covered by the DDA.

Q7 Do you have any of the following conditions which have lasted or are expected to last for at least 12 months?

- ☐ Deafness or partial loss of hearing
- ☐ Blindness or partial loss of sight
- ☐ Learning disability
- ☐ Developmental disorder
- ☐ Mental ill health
- ☐ Long term illness or condition
- ☐ Physical disability
- ☐ Other disabilities
- ☐ No disabilities
- ☐ Prefer not to say

Ethnicity

Below we are asking you to let us know which ethnic group best describes you? (Please tick one box from the appropriate section)

Q8 Please indicate your ethnicity

- ☐ White / White Other
- ☐ Mixed / multiple ethnic groups
- ☐ Asian / Asian British
- ☐ Black / African / Caribbean / Black British
- ☐ Other ethnic group
- ☐ Prefer not to say

Gender

Q9 What is your gender?

- ☐ Male
- ☐ Female
- ☐ Prefer not to say

Q1 Does your gender differ from your birth sex?

0



- ☐ Yes
- ☐ No
- ☐ Prefer not to say

Religion

Q1 Do you have a religion or belief that you would like to mention?

1

- ☐ Christian
- ☐ Muslim
- ☐ Jewish
- ☐ Buddhist
- ☐ Hindu
- ☐ Sikh
- ☐ Rastafarian
- ☐ No religion
- ☐ Prefer not to say
- ☐ Other

Plea _____

se
write
in
the
box

**Thank you for taking the time to complete this
survey**

Survey data – Raw output.

Responses to Question 2 Please expand on the reason for your answer to Q1 below.

Note: No changes to spelling have been made, minor changes made to protect respondent anonymity.

Tiverton Primary school already have two classes per year. My daughter wouldn't thrive in such big numbers.
I do believe that it was during the absence of permanent teacher is due caused of numbers declined. But now there is a very experienced head teacher and he need to give a chance to prove himself please. Stamford Hill primary school will fill the shortage gap.
Tiverton School has been doing really well, achieving a 'good' Ofsted rating and increasing pupil numbers. The extra staff/pupils might upset the balance. Stamford Hill has started to improve and without the 'Inadequate' Ofsted rating it is unlikely the school would have closed. There is a lot of housing being built in the surrounding areas so although the decline in birth rate is a concern it is likely pupil numbers will grow (and Tiverton would be unable to provide the places due to limited space).
Support should be offered to keep Stamford Hill Open-it was a good school but cuts to budget have had a huge impact on staffing and resources.
I'm assuming this is a big Jewish area and families are choosing Jewish schools over regular state primary schools?
There is going to be a massive development on the St Ann's Hospital site which will increase the number of families looking for schools in the area.
There is always a great need for school places and with new developments being built all over the area. New families moving into the area.
In principle I am supportive of this proposal as an alternative to Academisation or simple closure but I am concerned that once the surplus places are lost it will not currently be possible to reprovide them within the maintained sector due to government policy
Number of students falling?, but there are more than 700 homes being built around the school, have you considered of how many children are going to come and live with their families in these new homes? Schools will be needed.
I don't agree
I don't agree
Because amalgamation means Stamford Hill to disappear
I want my child to continue at this school
In principle I agree that a proposed amalgamation would benefit Stamford Hill school that recently became a school in special measures and obviously joining a good school such as Tiverton would benefit the school and local community. But I do have concerns! Is the proposed amalgamation due to the fact that Stamford Hill received a disappointing Ofsted report and will that be noted in the report? Will Tiverton School receive additional funding when the amalgamation takes place? Will it be funded and supported in developing its early year's department as I believe was the case for Stamford Hill which will no longer be available if the school amalgamates with Tiverton. Once children have been accepted will the school be quickly funded for any additional needs that are discovered I am aware that some of the children already at Tiverton from Stamford Hill are below age expectations and are receiving support without any additional funding. The Head teacher at Tiverton works extremely hard to raise standards for all children, taking on an amalgamation is a massive undertaking therefore will support be guaranteed for the Head Teacher and Senior leaders at Tiverton.
I agree with the proposal to amalgamate Stamford Hill Primary School and Tiverton Primary School. I think it would benefit Stamford Hill school as Stamford Hill School recently had an Ofsted and were graded special measures. Therefore joining Tiverton which has been graded good with elements of outstanding by Ofsted would benefit Stamford Hill School and local community. Is one of the reasons this amalgamation has been proposed due to the reason Stamford Hill School need support as the school was graded special measures? If so will this be made clear in the report? Also I a concern is, what amount of additional funding will Tiverton School receive if the amalgamation takes place? Or will Tiverton have any additional funding? What support will be in place from the local authority? What support will be in place for the Early Years department? This is

important and necessary in-order to enable us to accept younger children in an appropriate department. How long will it take for Tiverton School to be funded for any funding including, additional needs pupils, as this amalgamation will cause an increase of pupils with special educational needs arriving from Stamford school. This will also affect our data and we will need time to help raise the standards of the influx of pupils who are below age expected achievements. Will this be supported by the local authority through awareness of the additional time we will need to achieve this and not suddenly bring our data results down on national data records. What support and funding will be in place for this? Also what additional support will be in place for the Head teacher and senior leadership team at Tiverton? Will support be guaranteed for the Head Teacher and Senior leaders at Tiverton?
To increase student numbers at Tiverton, making each year group 2 forms as previously.
Stamford Hill has provided for many generations. If numbers are falling, then surely if teaching improves greater numbers will apply. It seems a great waste of a public school when other areas in London have a very small amount of spaces. This is a much better site also. Why not keep this site open and not close.
Since there isn't enough funds coming from the government to work in Stamford Hill, it is in our own interest to leave or join another school so there would be enough funds to support our children
It is because they will separate the friendship of the kids.
Stamford Hill primary school will fill this gap that something in school. Once teachers and headteacher can fill the shortage in the school then they will be more parent would like to register their child in Stamford Hill primary school
Stamford Hill primary school will fill this gap that something in school. Once teachers and headteacher can fill the shortage in the school then they will be more parent would like to register their child in Stamford Hill primary school
Economics makes this sensible. However: What about looking at housing policy? Will the decisions made now need to be reversed in two or three (or more) years time? What if there is an influx of families looking for schools into this area after these decisions are made.
It is too much hassle and not necessary.
Because some year groups have so few pupils and it might help for the school to have more benefits.
I don't think that that we shouldn't join Tiverton because then the children will leave their school or won't like the children in Tiverton so they won't feel comfortable. I also think that year 1 and 2 should go to Tiverton and years 3 to 6 should stay and after year 6 leaves or years the rest should go to Tiverton.
I am writing to state that I support the amalgamation and believe that Tiverton is well placed to lead on the new arrangements. Furthermore, we would like to do so as soon as possible, in order to minimise uncertainty for both schools and their communities. Tiverton Primary School leadership team, staff and GB have the skills, determination and commitment to undertake amalgamation fruitfully with another school by bringing together all the children. (Across one or two sites) This project will require essential additional support, resources and finance (as already documented in detail in the consultation report from the Tiverton governing body) for the amalgamation to be achieved with the best possible outcomes for the new school community. I am confident that appropriate resourcing by the Local authority, together with the dedication and resilience of the Tiverton team will serve to support a highly successful amalgamation.
In principle, I see the amalgamation as a positive move for our school. However, it is important to have clarity about funding and additional support which may be needed in transitioning pupils from one school to another – this is in terms of integrating the children well and being supported in filling any gaps which may exist in their learning and attainment given that they have been in a struggling school.
Broadly, I do agree. However, I am concerned about a few aspects which, I believe, have not been discussed with us in detail or explained clearly. The main ones would include the budget, support and assessment. Since we would be adding to our cohort pupils from a school deemed to be inadequate (and with poor academic record), extra support and funding need to be in place as students' knowledge gaps would have to be addressed. They might also need further support in their learning and personalised assessment which would take into account their academic past. Hence we would need adequate funding as well as some sort of formal acknowledgment that covers the points mentioned above.
I agree in principle depending on adequate funding and acknowledgement that there should be support for Tiverton Primary School who will be taking pupils from a school that has recently been judged as inadequate. Teachers will need to rectify issues raised in the Ofsted report, such as poor academic achievement to date. Will there be funding for Tiverton staff leading initiatives as this will

be an additional workload? We will also need to plan for interventions to support pupils with lower levels in order to close the gap. The amalgamation will have a negative effect on Tiverton data and they will need to explain the impact to external agencies such as Ofsted and the DFEE
I agree with proposal to amalgamate Stamford Hill Primary School and Tiverton Primary School. Stamford Hill Primary School recently had an Ofsted and was graded special measures. I think it would benefit Stamford Hill Pupils. My concern is that what amount of additional funding and support will Tiverton Primary School receive, if the amalgamation takes place.
I agree with the proposal to amalgamate Tiverton and Stamford Hill schools as I think it would offer students currently at Stamford Hill an opportunity to grow and develop in the vibrant, supportive and dynamic learning environment that is Tiverton Primary. Of course, there would need to be adequate resources and financial and other support in order to make a successful transition. If this support is in place I am sure that an amalgamation will lead to very positive educational outcomes.
I have concerns as a teacher about the additional funding for Tiverton Primary School to provide support for pupils who are coming from a school that was rated inadequate in December 2018. As a teacher I am expected to support the raising of attainment at Tiverton Primary School and my Performance Management is partially based on this. As a teacher will I be given an additional teaching assistant to help support these pupils from Stamford Hill meet their targets? Will the DFE and Ofsted be informed that Tiverton Primary School has amalgamated with an inadequate school and thus might suffer from decline in standards in the short term?
At Tiverton Primary School, it makes sense to amalgamate as the falling rolls at Stamford Hill Primary School will have a huge impact on income and spending. There are a few unresolved questions which I believe having clear answers to will give the community and our parents peace of mind as restricted spending may occur due to lack of funds. Tiverton Primary School have taken a few children during mid-academic year from Stamford hill which we won't be receiving funding for until 2020/21 – could alternative arrangements be made under special circumstances if we amalgamate? Tiverton Primary School has a deficit budget. What is the current position of Stamford Hill in regards to their budget? If they do carry a deficit or a surplus, will Tiverton Primary School be expected to take this on? Will there be additional funding to support the amalgamation aside from pupil funding? If and when the amalgamation happens, how can Tiverton Primary School be sure we can operate both site and be able to afford teaching and support costs and not jeopardise the children's extra curriculum and still be able to provide enrichment to the children?
In principle I agree to the proposal to amalgamate with Stamford Hill Primary School with Tiverton Primary School, as I believe that all children should have the best education and equality of opportunities. However, my question is will Tiverton receive additional resources and funding if the amalgamation takes place? And due to Stamford Hill Primary being inadequate, says to me that pupils have not received the best education meaning that pupils are below in their attainment. This will affect Tiverton's local and national league table; will this be taken into account? And is there a guarantee that there will be additional support from the LA?
I feel that if handled correctly the amalgamation could be very positive for both schools. Open, transparent discussion should take place on a regular basis as the amalgamation develops. I would expect that children with special educational needs and disabilities coming over from Stamford Hill would be given the funding needed to ensure that they receive support from outside agencies such as Educational psychologists and speech and language input. I would hope that any vulnerable and disadvantaged children coming over from Stamford Hill were clearly identified as soon as possible. Furthermore, it is essential that these children can be supported appropriately. Tiverton would require resourcing to cope with this extra cohort of children and families.
I would like to express support for the proposed amalgamation on behalf of the governing body of Tiverton Primary School, subject to the queries we have raised being addressed adequately. As a governing body, we feel that amalgamation is the preferential option if supported properly as it would address the falling roll in the area while ensuring the least disruption for pupils coming from Stamford Hill and maximum educational benefit. Our queries fit into two categories: those relating to the roles of the two schools being amalgamated, and those relating to the proper financing of an amalgamation. Roles of the Schools While we recognise that the primary reason for reducing PAN in the local area is the falling roll, we would appreciate reassurances that it is recognised that Tiverton is best placed to lead on the new arrangement. Tiverton Primary School is led by an exceptional Headteacher who has leadership capacity to support another school through Executive Headship by bringing all the children into one school (over one or two sites). Her talented leadership team manage the school well, supported by a stable and capable staff body and an involved and skilled Governing Body. Any new amalgamated school led by Tiverton leadership would have to work more intensively with children coming from Stamford Hill Primary in order to understand their needs and to enable them to meet age-related expectations. Unfortunately, standards at Stamford

Hill, which were criticised in their OFSTED report, will need time and increased resources to tackle, like all schools in special measures. While the recent Headteacher at Stamford Hill Primary is doing sterling work, many of the children who have joined us already have needed additional input. We would like the authority to recognise this issue and offer whatever resources are available. In the council Cabinet meeting on March 12th, the main reasons stated for the amalgamation were the falling numbers of pupils locally and Stamford Hill's status as an 'inadequate' school. The latter reason has not been recognised in public discussion of the proposed amalgamation since. As a governing body, we would appreciate assurances that the council recognises the challenge that would lie ahead if we were to integrate Stamford Hill children into the Tiverton community. We would expect that, where relevant (such as at the point of amalgamation and at an inspection), Haringey Council would liaise with Ofsted and the DfE to reinforce the fact that the amalgamation was a solution to support standards as well as a decision taken for financial efficiency. Finally, we would like confirmation that the Headteacher at Tiverton Primary, Resham Mirza, would be given overall leadership of the amalgamated schools and would be enabled to make decisions about staffing based on her own judgement, supported by her senior leaders and the governing body. There would not be a guaranteed transfer of Stamford Hill staff to Tiverton, although proper process would of course be followed. It would be practical for the Headteachers at both schools continue a productive relationship with Resham becoming involved in permanent staffing decisions made at Stamford Hill, following the consultation. Financial support available: Amalgamating the two schools would mean new financial pressures on the new school, which we are confident our Headteacher and School Business Manager would be able to manage given the proper support. We would like to recognise and thank the council for their efforts so far in uncovering what funding may be available, and remind them of the questions we are still seeking confirmed answers to, as below: If places were guaranteed for all Stamford Hill pupils at Tiverton, this would inevitably lead to 'bulge classes', which we anticipate would take several years of natural transition to manage back into being full classes. We would like assurance that the bulge class funding made available to other schools in Haringey in similar situations would be made available for as long as necessary. We will need to operate on a split site basis at least temporarily and will need additional support in the form of split site funding and other measures such as a crossing patrol before and after school. We would like to be re-assured that any additional funding would be available to support any children from Stamford Hill with SEND who need accelerated learning. We would request additional resources to support fast-tracked assessments. We need support in managing finances across both schools. We welcome news that Stamford Hill is not in deficit, structurally or historically, which we would seek to confirm with Stamford Hill school leadership. We would like to reassure the authority that our own deficit is reducing rapidly under careful management but we do not wish to jeopardise our own position. We would expect the authority to use all means at its disposal to protect the new school during the transition. We have given much thought to these queries as amalgamation is a very serious step, one that we hope will have a positive effect on the local communities and we are determined to make this work for the children. Once these queries have been addressed and there is clarity about the support that is available and necessary, the governing body of Tiverton would be happy to work alongside the team at Stamford Hill to find ways to move forward together after the consultation period.

First I do not agree with the school the Tiverton is not adapted for what they intend to do, and it is too small for this project.

Because you do not want there to be enough space for all the children of Stamford Hill and if there was, it would be an all-encompassing school and I would not say that there is a good education.

I do not really mind; since it has to be done

I am very happy with the school. I feel that by being a smaller school, the teachers are more focused on each of the children reaching the desired level. If there is no room for all the children, it would be better to accept a few children that are on waiting lists at other schools.

Because of the drastic change that our children would have in changing school buildings

First reason: NON-ETHICAL. They do not provide appropriate information for parents. Second reason: HARINGEY is acting irresponsibly, attacking the integrity of the students. Third reason: Psychological and emotional damage to students due to not enough information provided which leads to confusion among both parents and pupils. For these REASONS HARINGEY is disrespecting the basic rights to sincere and truthful information. Respect the normal development of the activities of (Stamford Hill) for the well-being of the pupils and parents/families. For the reasons stated above, the merger is not a positive alternative.

I definitely do not agree because I believe that the school wants it for other reasons. They should accept other children so that they do not close the school.

The class rooms will be crowded. The students may not be in the same class with the same level

Students. The period of settling; friends and the atmosphere will change.
I definitely don't want these two school to be merged. My son is in Xth year and my daughter is in Xnd year in Stamford Hill School. If these two schools are merged, the level of education will go down and our children will be mentally depressed. Nobody has any right to do this. Please do not merge the schools. Do not send the children to another school like parasite. My request from you is to act by thinking the children. Thanks.
I must agree because there is no other solution anyway!

Responses to Question 3

If you don't agree with Stamford Hill Primary and Tiverton Primary amalgamating which of the following is your preferred approach?

Either split site or keeping Stamford Hill open.
As i was saying with new and permanent experience head teacher, Stamford Hill primary school will bounce back fully.
I would prefer for the two schools to continue as separate bodies.
Keep Stamford Hill open with Robert Leach as Head!
As before, but there are lots of new homes being built in the area which will cater for all religions.
It's a big Jewish settlement. Kids are going to Jewish Specialized schools. There are lots of homes being built in the area soon, these kids will be from all religious backgrounds and need schooling Other local schools on the area are already over subscribed. Where will these kids go if you close this school?
The schools should remain as separate schools.
Take a class away from each year group.
n/a
Due to the Ofsted report for the School as inadequate, changing the name and keeping the school could be a very good option.
Federation or amalgamation I choose federation
Keep the school as there are many residential developments
There are hundreds of residential developments around the school, which means families are going to live in them so schools will be needed
There are hundreds of homes being built around the school
I preferred Stamford Hill to be for them to get the fund that they needs.
If any parent does not agree to join Tiverton primary school she/he should look for a school of their own choice
Because it will complicate the children with the friends.
Local authority need to step up and save Stamford Hill primary school. This is a good school obviously.
Think of the long-term needs of this area. Ensure the Stamford Hill building is in use for as long as possible.
Perhaps the school may have to shut down. Students transfer to another.
I disagree also because Y6 people that are leaving and would like to come back to our Primary wouldn't be able to come to visit.
I think this school should stay as it is because children might not like it. Also when year 5 and 6 leaves then the rest should go to Tiverton. Year 1 and 2 though should go only because it won't make a big difference to them.
I do not want the merger because there will not be enough places for everyone, how can a school have enough room for 100 children. It would be a huge change, and this process of change could cost us dearly. We are talking about children who need to be happy in their educational environment.
I think that the other school has a lot more children and many of the Stamford Hill pupils would be without a place. I think it would be a drastic change for all of the children because they have been in this educational establishment since pre-kinder.
The arbitrary decisions of the council (HARINGEY) are the cause of many students leaving our school. Stamford Hill (THE MERGER) is not the alternative. Because (TIVERTON) does not have the appropriate infrastructure to accommodate more pupils and this situation will be reflected in the unhappiness of the pupils: Note: "The damage is irreversible" "The solutions are easy".
They are building more houses in this area and more families will come and therefore more

children.

Children will find difficult to concentrate, there will be different personnel, they will not be able to adopt.

EQUALITY IMPACT ASSESSMENT

“The **Equality Act 2010** places a ‘**General Duty**’ on all public bodies to have ‘**due regard**’ to the need to:

- Eliminate discrimination, harassment and victimisation and any other conduct prohibited by or under the Act
- Advance equality of opportunity between persons who share a ‘relevant protected characteristic’ and persons who do not share it
- Foster good relations between persons who share a ‘relevant protected characteristic’ and persons who do not share it

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 protected 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 its 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	Amalgamation between Stamford Hill and Tiverton Primary Schools
Service area	Schools and Learning
Officer completing assessment	Nick Shasha
Equalities/ HR Advisor	Alisha Muhmood
Cabinet meeting date (if applicable)	12 November 2019
Director/Assistant Director	Eveleen Riordan

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: This proposal concerns the amalgamation between Stamford Hill, N15 6HD and Tiverton Primary Schools, N15 6SP. This would involve the closure of Stamford Hill Primary School, with the displaced pupils being accommodated by Tiverton Primary School.

The main reason for this proposal is to ensure the sustainability of all our primary schools across the borough in the light of falling demand. Haringey currently has a surplus of Reception school places equivalent to 9 forms of entry (261 places) or around 8% of our total Reception capacity. The 2019 School Place planning report indicates that this surplus is projected to rise to 459 by 2021/22. The proposal will ensure that sufficient school places are available to meet local demand.

Stakeholders: The key stakeholders are children currently enrolled at Stamford Hill Primary School, their parents and carers and those staff currently employed by the Council to work at the school.

Decision-making: We asked for (and received) approval from Cabinet on 12 March to consult on our proposed amalgamation. We are proposing to amalgamate Stamford Hill Primary with Tiverton Primary School. It is expected the existing cohorts of Stamford Hill would be absorbed by Tiverton Primary School (400m away). Parents and carers will also be given the opportunity to apply for places in other Haringey primary schools where vacancies exist.

To ensure as wide a consultation as possible we intend to provide details of the proposed changes in the following ways:

- through the Schools Bulletin which is distributed to the head teacher and chair of governors of every school in the borough;
- letter to all Haringey primary and secondary schools
- email to all Children's Centres in the borough;
- email to all registered nurseries and child minders and any other early years providers;
- published on the Council's online admissions pages;
- via information in all libraries across the borough (poster and hardcopies of consultation document);
- email to all councillors from the Lead Cabinet Member;
- email to both MPs with constituencies in Haringey;
- email to the diocesan authorities.
- email to the branch secretaries of all trade unions recognised by the Council for

collective bargaining in respect of its employees at Stamford Hill Primary School

- email to other groups, bodies, parents and carers as appropriate

An Equalities Impact Assessment (EqIA) will form an important part of the consultation and will seek to ascertain whether the proposed amalgamation of Stamford Hill Primary School with Tiverton Primary School could have an impact on protected groups and whether there are steps that can and/or should be taken to mitigate against such an impact.

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
Sex	May 2019 School census
Gender Reassignment	No national or local collected data
Age	May 2019 School census
Disability	2018 School census and data from Haringey SEN team
Race & Ethnicity	January 2019 School census (which has ethnicity)
Sexual Orientation	No local collected data on sexual orientation, however there is ONS annual population data (2016) and ONS sexual identity, UK (2015), which are estimates.
Religion or Belief (or No Belief)	Synthetic data derived from the 2011 ONS National census
Pregnancy & Maternity	2011 census
Marriage and Civil Partnership	2011 census

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.

1. Sex and age

Service users (Primary children by sex and age) -

	Stamford Hill							
	R	1	2	3	4	5	6	Total
Female	6	4	12	12	10	12	14	70
Male	13	5	9	12	9	13	11	72
Female %	32%	44%	57%	50%	53%	48%	56%	49%
Male %	68%	56%	43%	50%	47%	52%	44%	51%
Grand Total	19	9	21	24	19	25	25	142

	Tiverton							
	R	1	2	3	4	5	6	Total
Female	20	27	20	25	20	20	25	157
Male	10	26	17	17	29	32	27	158
Female %	67%	51%	54%	60%	41%	38%	48%	50%
Male %	33%	49%	46%	40%	59%	62%	52%	50%
Grand Total	30	53	37	42	49	52	52	315

	Haringey – all primary schools							
	R	1	2	3	4	5	6	Total
Female	1,475	1,419	1,454	1,548	1,493	1,571	1,587	10,547
Male	1,544	1,545	1,585	1,549	1,663	1,517	1,570	10,973
Female %	49%	48%	48%	50%	47%	51%	50%	49%
Male %	51%	52%	52%	50%	53%	49%	50%	51%
Grand Total	3,019	2,964	3,039	3,097	3,156	3,088	3,157	21520

Source: School Census May 2019

The data shows a reasonably equal distribution between female and male at Stamford Hill, Tiverton and across all Haringey primary schools. There is some year-to-year fluctuation at both Stamford Hill and Tiverton though this is to be expected given the small cohort sizes.

The age distribution at Stamford Hill, Tiverton and across all Haringey schools shows an equitable distribution. There is a current surplus of vacancies across Planning area 3 (where Stamford Hill and Tiverton are located) and indeed across Haringey as a whole. Should Stamford Hill close (with the net effect of losing 1 form of capacity) there is enough local capacity to ensure all the existing cohort can receive a school place

Staff at Haringey schools

	All teachers who are male (%)	All teaching assistants who are male (%)	All Non-classroom Based School Support Staff who	Auxiliary Staff who Are Male (%)
--	-------------------------------	--	--	----------------------------------

			Are Male (%)	
Haringey	29.2%	15.0%	23.6%	21.6%
Stamford Hill	0%	20.2%	0%	Suppressed
Tiverton	Suppressed	Suppressed	Suppressed	Suppressed

Source: SFR25 2017

Note: Some data for Stamford Hill and Tiverton have been suppressed due to low sample sizes

The majority of Haringey primary school staff are female, and this is reflected in each category of school staff. The imbalance of teaching staff is most apparent in teaching assistants, of which 15% are male across Haringey and 20.2% across Stamford Hill. If the outcome of this consultation leads to a reduction of staff female teachers and teaching assistants are therefore more likely to be affected by the proposal than male teachers and teaching assistants because of their greater prevalence in the school workforce.

Age of staff at Haringey primary schools

Percentage of teachers aged 50 or over

Stamford Hill	Tiverton	Haringey
Suppressed	Suppressed	20.2%

Source: SFR25 2017

Note: Data for Stamford Hill and Tiverton have been suppressed due to low sample sizes and data for Haringey is for all schools, primary and secondary

The data above suggests (due to low sample sizes) that neither Stamford Hill nor Tiverton have many teachers above the age of 50. If data collected during any subsequent consultation suggests that any proposal will inadvertently impact upon teachers based upon the protected characteristic of age attempts to mitigate this impact may need to be undertaken.

2. 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 not 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. For the purposes of this EqIA, we will use the inclusive term Trans* in order to represent the spectrum of transgender and gender variance.

3. Disability –

Service users: Total number of Children & Young People with statements or plans maintained by Haringey as at March 2018

Year	Totals	Year	Totals
Pre-School/Nursery	11	Year 9	129
Reception	56	Year 10	138
Year 1	78	Year 11	129
Year 2	88	Year 12	111
Year 3	114	Year 13	122
Year 4	96	Year 14	104
Year 5	113	Year 15	69
Year 6	114	Year 15 plus	115
Year 7	123	Totals	1,848
Year 8	138		

All Haringey schools are able to support children with a wide range of abilities, special needs, disabilities and learning difficulties, from able, gifted and talented pupils to those with multiple and significant disabilities, medical conditions and learning difficulties. Stamford Hill Primary not offer any specific provision that is not provided in other local schools.

Source: Haringey SEN team 2018

4. Ethnicity of pupil cohorts at Stamford Hill, Tiverton and Haringey primary schools

Service users: Ethnic composition (main groups and sub categories) of Haringey's primary school (Reception to Year 6) pupil population as at January 2019:

Haringey (Sub category) – Percentage (%)			
	Stamford Hill	Tiverton	Haringey
Any other white background ethnic origin	35%	39%	29%
White British ethnic origin	2%	4%	20%
Black African ethnic origin	13%	22%	14%
Any other ethnic group ethnic origin	21%	11%	6%
Black Caribbean ethnic origin	12%	7%	7%
Any other mixed background ethnic origin	1%	5%	5%
White and black Caribbean ethnic origin	2%	1%	3%
Bangladeshi ethnic origin	1%	2%	2%
White and Asian ethnic origin	0%	0%	2%
Any other black background ethnic origin	5%	2%	2%
Any other Asian background ethnic origin	0%	0%	2%
White and black African ethnic origin	3%	1%	1%
Chinese ethnic origin	0%	0%	1%

Indian ethnic origin	0%	1%	1%
Pakistani ethnic origin	0%	4%	1%
Irish ethnic origin	1%	0%	1%
Gypsy/Roma ethnic origin	0%	0%	0%
Traveller of Irish heritage ethnic origin	0%	1%	0%
Sum of number of pupils unclassified	2%	0%	1%
Total		100%	0%

Source: School Census January 2019

Note: Totals may not sum to 100% because of rounding

The data above confirms that both Stamford Hill and Tiverton have ethnically diverse pupil cohorts as do Haringey primary schools overall. Perhaps the most significant difference shown above is the proportion of White British pupils across Haringey as a whole (20%) compared to Stamford Hill (2%) and Tiverton (4%). This is likely because of the differing ethnic make-up of the borough between wards in the East where Stamford Hill and Tiverton are located and those in the West.

Staff ethnicity: ethnic profile of teachers, teaching assistants, non-classroom-based school support staff and auxiliary staff

Staff category	Stamford Hill	Tiverton	Haringey
BAME Teachers (as a proportion of all Teachers)	54.5%	83.3%	46.5%
BAME Teaching Assistants (as a proportion of all Teaching Assistants)	85%	64.3%	67.2%
BAME Non-classroom Based School Support Staff (as a proportion of all Non-classroom Based School Support Staff)	66.7%	50%	58.8%
BAME Auxiliary Staff (as a proportion of all Auxiliary Staff)	Suppressed	88%	75.2%

Source: SFR25 2017

The staff ethnicity data shows the broad composition of ethnicities among classroom and non-classroom staff.

At Tiverton three of the four groups of staff have over 50% representation from BAME ethnicities. At Stamford Hill, all three staff groups that have data also show 50% representation from BAME ethnicities (data for auxiliary staff is suppressed). Across all Haringey schools (primary and secondary) teachers from a BAME ethnicity make up just under half of all teachers (46.5%) whilst the other 3 categories show BAME representation of 67.2%, 58.8% and 75.2% respectively.

BAME communities are more likely to experience inequalities, such as discrimination and poverty. A greater proportion of Haringey schools' staff are White British as compared to pupils at Haringey schools.

5. Sexual orientation –

We do not hold ward or borough level data on sexual orientation, and it is not collected nationally through the Census. 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 country¹, and is likely to be reflected in both the pupil and parent populations. However, ONS data shows that 0.5% families are same sex cohabitating couples², which suggests that LGB people are less likely to be parents, compared with the wider population.

6. Religion or belief (or no belief) –

Religion or belief is not covered by the PLASC school census, which means that we don't have access to records for 2017. The best alternative proxy is the Haringey data derived from the England and Wales Census 2011 data on religion by age. Data on the appropriate age groups (0-4 and 5-7) has been combined to provide an approximation of the likely religious or belief profile of primary aged children in Haringey.

The notional number is based upon the known sample size of Reception aged pupils in Haringey (3,067) multiplied through the distribution of religion or belief from the 2011 Census.

	Percentage (%)	Notional Number
Christian	39.7%	1,218
No religion	20.9%	641
Religion not stated	12.3%	377
Muslim	19.3%	592
Jewish	5.6%	172
Hindu	1.0%	31
Buddhist	0.8%	25
Sikh	0.3%	9
Other religion	0.2%	6
Total	100%	3,067

Source: ONS (2011 Census data for Haringey)

Note: * Totals may not add up due to rounding

Those affected by the proposal are therefore more likely to be Christian, Muslim, or have no religion. Plans will need to have due regard to diversity issues relating to these communities though it should also be noted that the proposal is to reduce primary school places rather than those currently in use by pupils.

7. Pregnancy and maternity³

The proportion of 0-4-year olds in the Census 2011:

	Number of 0-4 year olds
Haringey	7.1%

¹<https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/sexuality/articles/subnationalsexualidentityestimates/uk2013to2015#introduction>

² <https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/sexuality/bulletins/sexualidentityuk/2015>

³ Census 2011

London	7.2%
England and Wales	6.2%

Haringey has a higher proportion compared to the England and Wales average but is marginally below the London average. Decisions will need to consider the needs of mothers with young children as they are likely to be disproportionately affected by the proposal.

8. Marriage and Civil Partnership⁴

	Married (heterosexual couples)	Civil Partnership
Haringey	32.2%	0.6%
London	40%	0.4%
England and Wales	47%	0.2%

The number of married people (only available to heterosexual couples at the time) is significantly lower than in London and England. However, the proportion of people in civil partnerships is higher in the area compared to the London and England and Wales average. Decisions will need to ensure all couples in a civil partnership are treated exactly the same as couples in a marriage.

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

The consultation has not revealed any negative impact on protected groups of residents and service users principally because we fully expect to still have a surplus of primary school places in the local area.

However, the benefit of running a pre-consultation was in assisting to identify harder to reach groups in the diverse communities of Stamford Hill school. Survey documents and consultation responses were translated into Spanish, Portuguese, Turkish and Polish. This has proved to be a useful exercise and will assist in shaping how we proceed to consultation.

A small number of staff members at Stamford Hill and Tiverton primary school will be affected by re-organisation to reflect the fewer staff positions required by an amalgamated school. As both schools are local community schools all affected staff are employed by the local authority and will be notified by Schools HR of the processes that will be undertaken.

The proposed closure of Stamford Hill Primary School will result in a reduction in the number of teachers and teaching assistants employed by the Council. As a greater proportion of school staff are women rather than men it is more likely women will be affected by this change.

⁴ Census 2011

Any potential impact needs to be evaluated in the context of scale and the fact that this bias of teaching staff to be female in primary schools is a local, London and national characteristic. Thus, contraction or expansion of teaching supply inevitably impacts (or benefits) females more than males. Affected staff should be supported by appropriate procedures such as access to a redeployment pool and support given to find another role in the Council.

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 consultation has not revealed any negative impact on protected groups of residents, service users, principally because we fully expect to still have a surplus of primary school places in the local area.

However, the benefit of running a pre-consultation was in assisting to identify harder to reach groups in the diverse communities of Stamford Hill school. Survey documents and consultation responses were translated into Spanish, Portuguese, Turkish and Polish. This has proved to be a useful exercise and will assist in shaping how we proceed to consultation.

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 EqlA guidance

1a. Sex – Service users *(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	X	Unknown Impact	
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The main impact of this proposal is that surplus primary school places will be reduced in the relevant planning area by reducing capacity. These places are in addition to those projected to be required by pupils it is anticipated that no impact on this characteristic (sex) will occur for pupils.

1b. Sex – teaching staff *(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)*

impact of this proposal on this protected characteristic)

Positive		Negative	X	Neutral impact		Unknown Impact	
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The proposed closure of Stamford Hill Primary School will result in a reduction in the number of teachers and teaching assistants employed by the Council. As a greater proportion of school staff are women rather than men it is more likely women will be affected by this change.

Any potential impact needs to be evaluated in the context of scale and the fact that this bias of teaching staff to be female in primary schools is a local, London and national characteristic. Thus, contraction or expansion of teaching supply inevitably impacts (or benefits) females more than males. Affected staff should be supported by appropriate procedures such as access to a redeployment pool and support given to find another role in the Council.

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)*

The main impact of this proposal is that surplus primary school places will be reduced in the relevant planning area by reducing capacity. These places are in addition to those projected to be required by pupils. We do not anticipate that this will have any impact on this group (gender reassignment).

However, steps will be taken to ensure that this protected group is not subject to discrimination as a result of this change in criteria.

Positive		Negative		Neutral impact		Unknown Impact	X
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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		Negative		Neutral impact	X	Unknown Impact	
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The main impact of this proposal is that surplus primary school places will be reduced in the relevant planning area by reducing capacity. These places are in addition to those projected to be required by pupils it is anticipated that no impact on this characteristic (age) will occur.

This change in primary school place provision is likely to result in the reduction of teaching and teaching assistant staff required though there is no reason to think teachers or teaching assistants of a specific age will be negatively affected.

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)*

of this proposal on this protected characteristic)

Positive		Negative		Neutral impact	X	Unknown Impact	
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The main impact of this proposal is that surplus primary school places will be reduced in the relevant planning area by reducing capacity. These places are in addition to those projected to be required by pupils and it is anticipated that no impact on this characteristic (disability) will occur.

This change in primary school places is likely to result in the reduction of teaching and teaching assistant staff required by the Council though there is no reason to think teachers or teaching assistants with disabilities will be negatively affected.

However, steps will be taken to ensure that this protected group is not subject to discrimination as a result of this change in criteria.

SEN pupils should not experience any change as a result of this proposal.

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		Negative		Neutral impact	X	Unknown Impact	
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The main impact of this proposal is that surplus primary school places will be reduced in the relevant planning area by reducing capacity. These places are in addition to those projected to be required by pupils and it is anticipated that no impact on this characteristic (race and ethnicity) will occur.

This change in primary school place provision is likely to result in the reduction of teaching and teaching assistant staff required by the Council though there is no reason to think teachers or teaching assistants of specific ethnicity will be negatively affected.

However, steps will be taken to ensure that this protected group is not subject to discrimination as a result of this change in criteria.

Pupils of any specific race or ethnicity should not experience any change as a result of this proposal.

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		Negative		Neutral impact	X	Unknown Impact	
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We do not hold ward or borough level data on sexual orientation, and it is not collected nationally through the Census. 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 country⁵, which is likely to be reflected in both the pupil and parent populations. However, ONS data shows that 0.5% families are same sex cohabitating couples⁶, which suggests that LGB people are less likely to be parents, compared with the wider population. However, we will need to ensure that discrimination based on sexual orientation is eliminated in the application of this criteria.

We do not anticipate that this change will have any impact on people based on their sexual orientation and we will continue to ensure there is no discrimination based on sexual orientation.

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)*

Religion or belief is not covered by the PLASC school census which means that we don't have access to records for 2018. The best alternative proxy is the Haringey data derived from the England and Wales Census 2011 data on religion by age. Data on the appropriate age groups (0-4 and 5-7) has been combined to provide an approximation of the likely religious or belief profile of primary aged children in Haringey.

There is no reason to suspect that children with any particular religion or belief (or indeed none) will be disproportionately affected by the proposal given that the proposal only intends to remove surplus school places.

Positive		Negative		Neutral impact	X	Unknown Impact	
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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)*

The proposed closure of Stamford Hill Primary School will result in a reduction of teaching and teaching assistant staff required by the Council. As a greater proportion of school staff are women it is possible that staff members who are pregnant may be more impacted by this proposal. It is important to note though that there may not be any school staff affected under this characteristic.

Any potential impact needs to be evaluated in the context of scale and the fact that the sex bias of teaching staff in primary schools is a local, London and national characteristic. Affected staff should be supported by appropriate procedures such as access to a redeployment pool and support given to find another role in the Council.

However, monitoring of this protected group should ensure it is not disproportionately affected.

Positive		Negative		Neutral	X	Unknown	
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⁵<https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/sexuality/articles/subnationalsexualidentityestimates/uk2013to2015#introduction>

⁶ <https://www.ons.gov.uk/peoplepopulationandcommunity/culturalidentity/sexuality/bulletins/sexualidentityuk/2015>

				impact		Impact	
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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*)

Teachers or teaching assistants who may be affected by this proposal who are in a civil partnership will be treated the same as people who are married.

Positive		Negative		Neutral impact	X	Unknown Impact	
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10. Groups that cross two or more equality strands e.g. young black women

This proposal could have a negative impact on pregnant women due to the over-representation of women amongst Haringey schools staff.

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?

- There is a possibility that this proposal could disadvantage pregnant women due to the greater prevalence of women amongst teachers and teaching assistants across Haringey schools' staff.
- Any potential impact needs to be evaluated in the context of scale (i.e. by establishing if there are pregnant women affected by this proposal)
- The proposal should also be viewed in the context of ensuring the sustainability and breadth of offer at Haringey's primary school estate. Doing nothing would put many schools under possibly intolerable financial burden due to growing surpluses which would likely worsen wider educational outcomes for all pupils.
- Moreover, Stamford Hill is currently OFSTED rated Inadequate. Moving its current cohort of pupils to any other Haringey primary school would ensure they were educated at a school with a Good or Outstanding OFSTED rating – all other

Haringey primary schools are rated as Good or Outstanding.

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. <u>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.</u>	Y
Adjust the proposal: the EqIA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. Clearly <u>set out below</u> 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
Sex	<i>Ensure all staff affected are given full and fair access to the redeployment pool.</i>	<i>Alisha Muhmood</i>	<i>Q1-Q3 2020</i>
Pregnancy and maternity	<i>Monitor this group to ensure that if this characteristic is affected (i.e. if pregnant or staff on maternity are included) those affected are given full and fair access to the redeployment pool</i>	<i>Alisha Muhmood</i>	<i>Q1-Q3 2020</i>
N/A			
N/A			

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.

As mentioned above there is a possibility that this proposal could adversely impact female teachers / teaching assistants as greater numbers of them are female rather than male and are likely to be made redundant or re-deployed. And as result of the impact on sex there could also be an additional impact on pregnancy and maternity.

The negative impact on these teachers and teaching assistants has been identified as a potential issue in the proposal to close Stamford Hill Primary School. However, the proposal is a reasonable and proportionate response to ensure the sustainability and breadth of offer at Haringey's primary school estate. Taking no action would put many schools under possibly intolerable financial burden which would likely worsen wider educational outcomes.

6 c) Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented:

Following the results of the consultation it is proposed to consider any possible mitigating factors that may alleviate impacts of these teachers / teaching assistants. This will include access to redeployment, HR support and guidance in applying for alternative positions and redundancy packages, where applicable.

7. Authorisation

EqlA approved by
(Assistant Director)

Date

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8. Publication

Please ensure the completed EqlA is published in accordance with the Council's policy.

Please contact the Policy & Strategy Team for any feedback on the EqlA process.

Report for Cabinet November 2019

Title: Childcare Sufficiency Assessment and Childcare Action Plan 2019-2022.

Report authorised by: Charlotte Pomery, Assistant Director Commissioning

Lead Officer: Christine Yianni, Childcare Sufficiency Manager
0208 489 2492
christine.yianni@haringey.gov.uk

Ward(s) affected: All

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

1. Describe the issue under consideration

- 1.1 The Childcare Act 2006 places a duty on the Council to ensure there is enough childcare within its area for working parents. Local authorities are required by legislation to secure sufficient childcare, so far as is reasonably practicable, for working parents, or parents who are studying or training for employment, for children aged 0-14 (or up to 18 for disabled children).
- 1.2 In fulfilling this duty, there is an expectation that an assessment of the childcare market within the borough is carried out every three years and informs a plan of action to address emerging and continuing needs. The scope of the duties contained within the Act, firmly positions the Council as market manager, required to take clear actions to encourage a wide range of good quality and accessible childcare that meets the needs of parents/carers seeking to work and/or study.
- 1.3 The benefits of having sufficient childcare provision for children and young people cannot be understated. From its contribution to improving family economic wellbeing to supporting the learning and development of children, childcare has a key role to play in increasing the potential for developing resilient and resourceful communities and in delivering Community Wealth Building ambitions. We know from research that children who attend high quality early years provision flourish when they reach school age and do far better than their peers who have not had the same opportunities. Central to any drive to improve access to high quality childcare, is to reduce barriers to access and ensure that all children and young people in Haringey are able to experience the benefits, regardless of circumstance or background and to achieve their potential.
- 1.4 This paper presents Haringey's third Childcare Sufficiency Assessment (CSA), at Appendix 1, providing an overview of the 2019 exercise and highlighting key findings. The report introduces a proposed childcare action

plan which encapsulates a response to the needs and trends drawn out through the CSA. This report seeks approval from Cabinet for the proposed Childcare Action Plan, 2019-2022 attached as Appendix 2, which addresses the key findings from the CSA and identifies areas for action.

2. Cabinet Member Introduction

- 2.1 This report provides an overview of the many issues related to provision of childcare in Haringey. Childcare is a service which straddles many different themes- early education; social and emotional support for children and families; early intervention; help for working parents or those seeking employment. As such it is an issue which is important in delivering many priorities within the Borough Plan.
- 2.2 This childcare sufficiency assessment (CSA) makes plain the complexity supporting the childcare market, where the council acts as a commissioner, broker and enabler, supporting a wide diversity of providers in a competitive market environment. Government policy in this area imposes many roles on local authorities, and this Childcare Sufficiency Assessment highlights key areas of development needed to ensure childcare places are taken up, especially by those who are hardest to reach and yet have the free entitlement.
- 2.3 The CSA sets out many challenges for the local authority, amongst which is the need to support providers in remaining sustainable and viable in a very volatile market. The report highlights key areas of work and issues raised during this assessment which can be found at para 6.3. These confirm the cross departmental nature of childcare provision, covering employment support, social regeneration, early intervention and prevention, health and well-being, family support as well as the critical and central issue of early childhood education. It follows that to achieve our goal of supporting providers in delivering childcare, a high level of inter-departmental and multi-agency working is necessary.

3. Recommendations

- 3.1. Cabinet is asked to:
 - 3.1.1 Approve the Childcare Sufficiency Assessment 2019 and key findings attached as Appendix 1 to this paper
 - 3.1.2 Approve the proposed Childcare Action Plan 2019-2022 attached as Appendix 2 to this paper

4. Reasons for decision

- 4.1. The reason for the recommendation is that a decision to approve the proposed Childcare Action Plan, 2019-2022, will ensure that the Council is fulfilling its statutory duty, under the Childcare Act 2006.

- 4.2. The proposed Childcare Action Plan, 2019-2022, provides a framework for action which should ensure that the Council is proactively addressing some of the key issues and challenges currently having an impact on the accessibility and sufficiency of childcare provision for 0-14 years olds and those aged up to 18 years of age if they have a disability. The implementation of an approved Childcare Action Plan underlines the Council's role as market manager and a drive to continually improve the sufficiency of and the access to childcare across the borough.
- 4.3. A further reason for the recommendation lies in the fact that the Childcare Sufficiency Assessment (CSA) has identified the need for focused work to address sustainability within the childcare market, to tackle barriers in access to, and the affordability of, childcare, to develop plans for future childcare demand in areas of economic growth and to maximise participation in the free early education entitlements. Having a robust Childcare Action Plan in place will enable the Council to further enhance work currently being undertaken with internal and external partners, to bridge gaps in childcare, support parents' childcare needs, support providers to deliver sustainable childcare and improve support to children with special educational needs.

5. Alternative options considered

- 5.1. The requirement to complete a CSA and produce an Action plan is part of the statutory requirement placed on the Council by the Childcare Act 2006. There are no alternative options to consider.

6. Background information

6.1. National Policy Context

- 6.1.1 The Childcare Act 2006 gives the local authority a key role in shaping the childcare market for children aged 0-14 (or up to 18 for disabled children).
- 6.1.2 Since 2015, there have been a number of national policy changes that have sought to tackle some of the wider determinants of child poverty, social disadvantage and inequality. One approach taken by Government has been to seek to increase parental and child access to high quality early education. A policy drive that has underpinned this approach has been the attempt to widen participation in high quality education particularly for some of the more disadvantaged young children in society. This has been in recognition of the beneficial contribution of access to high quality child care and early education towards narrowing gaps in education attainment and economic disadvantage.
- 6.1.3 These policy changes place a number of statutory responsibilities on the Council including the:
 - Provision of Early Years Pupil Premium (EYPP) funding to schools and early years providers offering the free entitlement for the most disadvantaged 3 and 4 year olds.

- Implementation of the national funding formula for early years providers to maximise the amount of early education funding passported to providers and therefore benefitting the children in their care
- Creation of an early years inclusion fund, enabling early years providers to meet the needs of 3 and 4 year old children with SEND
- Distribution of the disability access funding (DAF), offering funding to early years providers to support the access needs of 3 and 4 year old children attracting Disability Living Allowance.
- Tax free childcare to support parents with their childcare costs
- Deliver an extended free entitlement for the working parents of 3 and 4 year old children.

6.2 Local Context

- 6.2.1 Haringey has a strong and diverse mix of childcare providers made up of private, voluntary, independent, maintained schools and childminders. There are over 300 providers offering childcare places for 0 to 4 year olds and two large nursery chains delivering childcare. Providers are committed to improving outcomes for children and have worked with the Council to improve the quality of their provision, reflected in the significant rise in the number of providers with Ofsted ratings of Good or Outstanding. In addition to this, there is a rich mix of provision for over 5 years old with just over 100 breakfast and after school clubs with 50% of them being delivered by schools and 16 holiday clubs all delivered by private providers.
- 6.2.2 The Council's implementation and delivery of the extended free entitlement for 3 and 4 year olds (30 hour offer) has been a great success and had a real impact in supporting parent/carers to work across Haringey, particularly in the St Ann's, Noel Park and Fortis Green wards. The number of Haringey children estimated by the Department for Education to be eligible for this offer amounted to 1,710 and the January 2019 census recorded 1,227 children in place (72%).
- 6.2.3 Haringey has a highly diverse and increasing population of resident children, 0 to 17 year olds, especially in the east of the borough, which accounts for one in five of the population. 67% of the resident population are identified as non-white British ethnic groups and the highest number of 0 to 4 year olds from Black, Asian and Minority Ethnic (BAME) communities lives in Tottenham Hale, Tottenham Green and Northumberland Park wards (NOMIS 2017). The most highly populated wards of 0 to 4 year olds are in the east of the borough with Northumberland Park and Seven Sisters accounting for the highest population of children.

- 6.2.4 Projections for the 0-3 year olds¹ across Haringey shows that overall wards in the East of the borough are projected to have greater levels of growth in their population between now and 2027. The 0-3 year population in Haringey's eastern wards is projected to increase from 10,659 (2019) to 11,329 (2027) an increase of 670. By contrast, in Haringey's western wards 0-3 population is actually projected to decrease from 3,755 to 2,975 over the same period, a decrease of 782. Monitoring the ongoing availability of childcare and available vacancies will help understand where pressure for future funded childcare exists.
- 6.2.5 Whilst Haringey children's attainment in the early years is above the national and inner London average, there are children from Black, African minority ethnic groups in some wards who are underperforming against targets.
- 6.2.6 Unemployment in the borough overall is lower than the London average as recorded by NOMIS 2018 using ONS 2011 data, however, focusing on the East of the borough there are more families proportionately living in workless households (42%). Average annual household income for Northumberland Park falls well below the London average (ONS 2017) and the east of the borough continues to have a significantly higher rate of income deprived families than the west.
- 6.2.7 The number of children and young people with statements is on an upward trajectory and the highest prevalence rates of children with SEND were also recorded in the East of the borough.

6.3 Key areas of challenge

- 6.3.1 Whilst improvements in participation and the impact of childcare have been seen over the last three years, it is recognised that some key areas of challenge remain.
- The highest number of resident 2, 3 and 4 year olds are in the east of the borough amongst Seven Sisters, Tottenham Hale and Northumberland Park wards. The ongoing availability of childcare places is key in these wards to meet the Council's sufficiency duty.
 - A high number of children with SEND is being identified in Northumberland Park and Tottenham Hale wards and adequate provision and budget is required to satisfy demand for children with SEND.
 - There are many children living in out of work benefit households and in temporary accommodation and there is work underway with regeneration teams to support families to access work and training opportunities.
 - Affordability of childcare is a barrier for parents who wish to work. Average cost of childcare in Haringey is higher than the national average.

¹ Source: GLA 2019 Borough preferred option population projection medium out migration

A more collaborative approach with childcare providers and employers is required to promote tax free childcare to parents/carers to reduce the cost of childcare.

- There is a shortage of provision for older children (5 to 11 year olds) across the borough, particularly in Haringay and West Green wards and more provision for working families is required.
- Sustainability of settings is a concern especially in areas of disadvantage with increasing costs, static funding, staff recruitment and retention challenges and fewer fee-paying parents. More support is required to help providers understand and work with their cost base.
- Take up of the Disability Access Funding (DAF) has been low and the Early Years Pupil Premium (EYPP) and Free School Meals (FSM), are areas where improved take up is essential to support vulnerable families. Families need to be further encouraged to claim funding to maximise on the support available to the children.

6.3.2 The Council is keen to understand the impact on sufficiency of 2-year-old places and ensure that all entitlements work together. Highlighting areas of risk, provider viability and sufficiency of places across the childcare market is essential to embed and develop partnership working across providers and accessible early education provision can be sustained and thrive.

6.3.3 In light of the reduced rate of funding for 2 year old providers from September 2019, delivery of one to one business support sessions supporting provider sustainability commenced in June and was aimed at their longer term viability. Support was targeted at all providers who stood to lose £1,000 or more. There was a low response rate from providers only working term time and the support is available and ongoing for providers who are identified at risk due to their sustainability, viability and low occupancy rates.

6.4 The 2019 Childcare Sufficiency Assessment Exercise

6.4.1 The CSA was carried out over a period of five months and involved the completion of a range of surveys, telephone interviews, fieldwork interviews and workshops to gather information and feedback on the childcare market in Haringey. The exercise sought to hear parents/carers views on the suitability of childcare. In addition, the views of providers across the borough were sought.

6.4.2 The CSA was focused on understanding the childcare landscape in Haringey, including the current profile of the childcare market, gaps and potential future demands. Areas of focus included a review of the impact of the introduction of the 30 hours extended free entitlement for 3- and 4-year olds, as well as the longer-term viability of the 2-year-old free entitlement offer.

- 6.4.3 The CSA exercise built on work that was already being undertaken to review participation and explore gaps in childcare provision, particularly for children aged 5-14 year of age and those with special education needs and disabilities.
- 6.4.4 The exercise followed a period of internal analysis of the take up of the free entitlements to assess participation, particularly amongst key community groups and specific groups of children. whether providers were flexible in the delivery of the entitlement and childcare offered was suitable for working parent's needs.
- 6.4.5 The 2019 CSA has highlighted some key themes in relation to childcare:

Headlines from CSA

▪ **Understanding and awareness amongst residents**

There is a need to raise the profile of information available to parent/carers and providers to increase awareness of the offers, particularly for the extended hours as 83% of the parents who completed the survey did not think they were eligible for the offer.

▪ **Accessibility**

In areas of housing development and regeneration, analysis of current and potential demand supporting engagement is required to ensure the sufficiency of childcare places corresponds to the changes in local need. An increased number of parents have flexible working patterns i.e. shift work, weekend work and a high percentage of respondents stated that they would look for the flexibility in childcare.

▪ **Access to childcare for children and young people with SEND**

There is a need to support Childcare providers overcome the challenges with accessibility, funding and supporting appropriately trained staff to care for children with SEND.

▪ **Childcare Market**

Providers are facing increasing cost pressures what could potential affect long term viability.

▪ **Affordability**

Childcare costs have been cited as a barrier to work and training opportunities.

▪ **Out of school and holiday provision**

There is a need to commission/support the development and expansion of out of school and holiday provision for children with SEND and the growing population of all 5 to 11 year olds. There is limited childcare provision for the 10-14 year age range and this is a priority area for action. As outlined in the young people at risk of violence strategy a collective and coordinated approach will provide activities for young people to keep them safe and free from harm.

- 6.4.6 The Childcare Action Plan, 2019-2022 at Appendix 1 sets out steps to for continued work with childcare providers, parent, frontline professionals and residents to improve access to good quality childcare across Haringey. Bringing together sufficiency data and demographic information, as well as a review of the needs and trends, the Action Plan has been developed to provide a robust framework for action over the next four years.

7. Contribution to strategic outcomes

- 7.1. The CSA and associated Action Plan contribution to the delivery of the Haringey Borough Plan (2019-23) and notably Priority 2, where the vision is for a Haringey where strong families, strong networks and strong communities nurture all residents to live well and achieve their potential and where three identified outcomes are:

- Outcome 4 - Best Start in Life: the first few years of every child's life will give them the long-term foundations to thrive
- Outcome 5 - Happy Childhood: all children across the borough will be happy and healthy as they grow up, feeling safe and secure in their family and in our community
- Outcome 6 -Every young person, whatever their background, has a pathway to success for the future

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

8.1 Finance

- 8.1.1 The sufficiency assessment provides a steer on where efforts for should be targeted. The report and the sufficiency assessment do not present any immediate significant additional financial burdens to the council, although the sustainability of settings remain a challenge. It is expected that the costs to the Council will be met by the Children's Services budgets
- 8.1.2 Haringey's Early Years Allocation for 2019/20 has been revised down to £20.09m from the initial indicative ESFA estimate of £20.25m to reflect the January 2019 census.
- 8.1.3 The indicative allocations for 2020/21 are expected to be announced in December 2019

8.2 Corporate Governance

- 8.2.1 Under Section 6 of the Childcare Act 2006 (**Duty to secure sufficient childcare for working parents**) the Council is under a duty to secure sufficient childcare, so far as is reasonably practicable, for working parents, or parents who are studying or training for employment, for children aged 0-14

(or up to 18 for disabled children). In determining whether the provision of childcare is sufficient to meet these requirements, the Council – (a) must have regard to the needs of parents in their area for – (i) the provision of childcare in respect of which the child care element of working tax credit is payable, (ii) the provision of childcare in respect of which an amount in respect of childcare costs may be included under section 12 of the Welfare Reform Act 2012 in the calculation of an award of universal credit, and (iii) the provision of childcare which is suitable for disabled children, and (b) may have regard to any childcare which they expect to be available outside their area.

8.2.2 The Department for Education has issued statutory guidance to local authorities titled 'Early Education and Childcare' (June 2018) which the Council is obliged to have regard to. The guidance provides a list of matters that local authorities should take into account to secure sufficient child care places. They include the following:

- a) the state of the local childcare market, including the demand for specific types of providers in a particular locality and the amount and type of supply that currently exists;
- b) the state of the local labour market including the sufficiency of the local childcare workforce;
- c) the quality and capacity of childcare providers and childminders registered with a childminder agency, including their funding, staff, premises, experience and expertise;
- d) should encourage schools in their area to offer childcare from 8.00am until 6.00pm and in school holidays;
- e) should encourage existing providers to expand their provision and new providers to enter the local childcare market if needed.
- f) should encourage providers to take a sustainable business approach to planning and signpost providers to resources to support them.

8.2.3 The guidance further provides for annual report to elected members on how the duty to secure sufficient childcare is being met. The report should include:

- a) a specific reference to how they are ensuring there is sufficient childcare available to meet the needs of: children with special educational needs and disabilities; children from families in receipt of the childcare element of Working Tax Credit or Universal Credit; children with parents who work irregular hours; children aged two, three and four taking up free places; school age children; and children needing holiday care;
- b) information about the current and projected supply and demand of childcare for particular age ranges of children, and the affordability, accessibility and quality of provision; and
- c) details of how any gaps in childcare provision will be addressed.

8.3 Procurement

- 8.3.1 Strategic Procurement notes the contents of this report to which there are no immediate procurement ramifications. However, procurement will provide support and guidance in relation to external commissioning of child care provision to assist commissioning to discharge its duty, meet its action plan and deliver strategic objectives.

8.4 Equality

- 8.4.1 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.
- 8.4.2 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 number of children and young people with an Education Health and Care Plan statement is on an overall upward trajectory. In 2018, the Haringey Schools Place Planning report stated that there were 1,848 children with a statement or Education Health care plan and 1,348 children and young people resident in the borough with SEND.
- 8.4.4 There is a high incidence of children and young people with SEND in the East of the borough particularly within BAME backgrounds. The Council's action plan has addressed the need to create more provision for children and young people with SEND to satisfy the demand and ensure childcare places and services for young children are available to ensure equality and inclusion. By delivering services for children with SEND it will help to address inequalities in access to childcare places and ensure there is sufficient provision for these families.
- 8.4.5 The childcare sufficiency duty affects children and young people of 0 to 14 years and up to 18 for children with disabilities and/or additional needs. It will support the Council to meet its equalities duties and address any gaps in provision through the Childcare Sufficiency Action plan.
- 8.4.6 By providing good quality childcare and services it will embrace diversity and all children will have equal opportunities for learning. It will have a positive

impact on parents who wish to work or study and will be good for Haringey's local economy.

9. Use of Appendices

9.1. Appendix 1 – Childcare Sufficiency Assessment 2019

9.2. Appendix 2 – Childcare Sufficiency Action Plan 2019-2022

10. Local Government (Access to Information) Act 1985 (if not applicable state)

- 10.1. The following background papers have informed the preparation of this report:
- Early education and statutory guidance for local authorities, June 2018
 - Haringey Borough Plan 2019-2023

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London Borough of Haringey

2019 Childcare Sufficiency Assessment

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Introduction

The following Childcare Sufficiency Assessment presents an analysis of the supply and demand of childcare, along with parents' views on childcare in Haringey, as of 2019. Fundamentally, in 2019, the required research had a particular focus on the evolving 30 hours childcare offer and how its first 18 months of roll out was implemented.

Having sufficient childcare means that families are able to find childcare that meets their child's learning needs and enables parents to make a choice about work and training. This applies to all children from birth to age 14 and up to 18 for children with disabilities.

The strategic context for childcare sufficiency

The Childcare Act 2006 and 2016 requires local authorities in England to ensure sufficient childcare, where reasonably practicable, for working parents, parents studying or training and for children aged 0 –14 years (or up to 18 for disabled children). The duties in the act (Section 6) require local authorities to shape and support the development of childcare in their area in order to make it flexible, sustainable and responsive to the needs of the community. This role is described as a 'market management' function, supporting the sector to meet the needs of parents, children and young people, parents and stakeholders.

Under section 6 of the act there is a requirement on local authorities to produce an annual sufficiency report on the availability and sufficiency of childcare in their area. This information should be made available to parents and elected members. To meet section 6 duties, local authorities need to collect and publish information on the supply of provision and demand for childcare in their area. Statutory guidance provides clear indication of what must be included in the annual review, and what should be included.

Section 7 requires local authorities to secure prescribed early years provision free of charge. This provision is for children aged 2, 3 and 4 years of age.

Section 12 places a duty on local authorities to provide information, advice and assistance to parents and prospective parents relating to the provision of childcare, services or facilities that may be of benefit to parents and prospective parents, children and young people and publish information regularly.

Finally, the Childcare Act 2016 placed a subsequent duty on English Local Authorities to secure free sufficient childcare for the extended entitlement (30 hours).

Methodology

Four phases of research and analysis were undertaken to inform the report and the concluding gaps analysis section:

1. Providers Audit

A structured telephone survey was undertaken with Ofsted registered early years childcare providers and registered out of school childcare providers operating throughout the London Borough of Haringey, i.e. Private, Voluntary and Independent (PVI) sector nurseries and pre-school playgroups, maintained nursery classes, registered childminders, after school clubs, before school/breakfast clubs and holiday playschemes all participated.

A standard format of semi-structured interview questions invited the borough's childcare providers to feedback on issues *including*:

- Number of children *on roll* and *occupying* (pre-defined types of) childcare places
- Evolving impact(s) of the 30 hours childcare offer
- (Any differences in) demand observed for all three types of funded entitlements since the localised inception of the 30 hours childcare offer
- Support accessible to children with SEND
- Trends observed since the previous 2016 Childcare Sufficiency Assessment
- Considered needs in terms of support and advice from the local authority

2. Survey with Parents/Carers

In spring 2019, parents and carers who were resident within the London Borough of Haringey responded to three consultation approaches:

1. A core series of structured telephone interviews, which were undertaken by Premier Advisory Group's Sufficiency Projects Team
2. A series of fieldwork interviews – so as to ensure representation from parents and carers from all sections of the borough's diverse communities
3. An on-line survey, which enabled parents and carers to also feedback at their convenience

The on-line survey was promoted through the local authority's social media channels – including via their twitter feed. A sampling framework was developed to ensure (a) geographical coverage aligned to relative population levels in specific areas of the Haringey locality; (b) to ensure that families who were using formal childcare and who were not using formal childcare (at the time of the research) could provide their feedback; (c) to ensure coverage of key issues related to 2, 3 and 4 year olds who were accessing the three types of funded early years/childcare entitlements.

3. Identification of key demographic and socio-economic issues in Haringey

Structured desk research was undertaken in order to identify demographic and socio-economic factors which will have a *discernible influence* on the (sufficiency of and suitability of) existing and future provision of early years childcare/funded entitlements and out of school childcare throughout the London Borough of Haringey locality and its 19 wards.

This desk research included a focus on:

- Population projections/forecasts for 2 year olds and 3 – 4 year olds
- Population projections/forecasts for over 5 year olds
- Birth rates since 2016 in order to help inform forthcoming potential demand for 30 hours childcare offer provision
- Migration data
- Incidence of working families (that could be eligible to take-up the 30 hours childcare offer) and average household incomes
- Incidence of children and young people from low income families
- Incidence of children with SEND
- Incidence of major new housing developments

4. Gaps Analysis and CSA Production

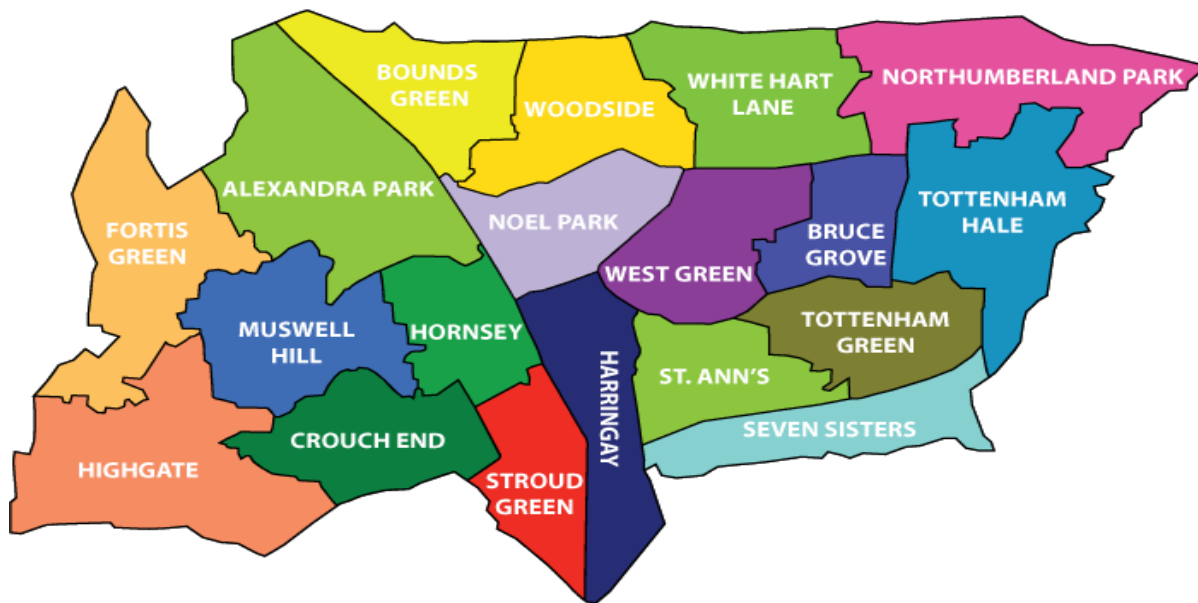
The following Childcare Sufficiency Assessment was produced in spring 2019. It has incorporated a gaps analysis – see pages 110 – 115 - which has a specific focus on short and medium term strategic priorities for childcare sufficiency planners at the London Borough of Haringey, with an additional focus on emerging localised features of the 30 hours childcare offer.

Acknowledgements

Premier Advisory Group gratefully acknowledges the support and cooperation of all the childcare providers involved with the assessment.

The consultation draws heavily on the views and experiences of parents and carers. Their contribution to the research and the sufficiency findings has been invaluable.

The Nineteen wards comprising the London Borough of Haringey



The six Network learning Communities comprising the London Borough of Haringey

There are six Network Learning Communities (NLCs) which have been used as the base for the Childcare Sufficiency Assessment: 1. Muswell Hill/Highgate; 2. Hornsey/Stroud Green; 3. Wood Green; 4. Harringay/West Green; 5. North East Tottenham; 6. South East Tottenham.



Policy Context

Since the previous assessment, the Childcare Act 2016 has seen the introduction of tax free childcare and the extension of free entitlement for working families, in order to increase the access to affordable childcare for families.

Childcare planners in the London Borough of Haringey are aware that the report *Unlocking talent, fulfilling potential, A plan for improving Social Mobility through education*, introduced by the Department for Education in December 2017¹ has a key role to play in achieving the aims for young children in the following areas:

Ambition 1 – Close the ‘word gap’ in the early years. Good early years education is the cornerstone of social mobility. Children with strong foundations will start school in a position to progress, but too many children still fall behind early, and it is hard to close the gaps that emerge. There is a need to tackle these development gaps at the earliest opportunity, particularly focused on the key early language and literacy skills, so that all children can begin school ready to thrive.

Ambition 2 – Close the attainment gap in school while continuing to raise standards for all. The attainment gap between disadvantaged children and their more affluent peers is now closing. However, certain pupils still remain behind their peers at each key stage at school. There is a need to build on the many more good school places and the innovation unleashed by recent reforms, focusing on raising standards in the areas of the country where it is now most needed.

Childcare market in 2019 compared to last sufficiency assessment in 2016

When undertaking a comparative analysis of changes observed, in 2019, since the London Borough of Haringey’s 2016 Childcare Sufficiency Assessment the following was observed:

Childminders

The number of childminders has decreased from 224 to c175 – 180, a net overall reduction of c45 – 50 which is in keeping with national trends. However, there has been a 35% increase in childminders offering the funded entitlement.

Private, Voluntary and Independent Settings

There has also been an increase in the number of PVI settings, since 2016, from 76 providers to 81 on the childcare register in 2019. However rising costs and static funding has had an impact on providers, especially pre-school/playgroups who are concerned about their viability for the future.

1

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/667690/Social_Mobility_Act_ion_Plan_-_for_printing.pdf

There are over 300 providers offering childcare places for 0 – 4 year olds and there are two large nursery chains delivering childcare in Haringey.

Out of school provision

There has been an increase in out of school provision since the previous CSA but the Borough still has a demand for places particularly in the 5 – 11 years age range.

Ofsted Gradings

The overall quality of provision has increased with the majority of childcare providers across the sector now judged as Good or Outstanding by Ofsted.

Take up of funded places – census comparison from January 2018 to January 2019

Figures on take up of the funded entitlements for 2, 3 and 4 year olds are provided by DfE on an annual basis are linked to the January census returns.

The January 2019 census indicated that take up in the London Borough of Haringey was 689 for 2 year old children, a decline from the previous census headcount data, for January 2018, which was 850 children.

Take up of 3 year olds increased from 2,770 in the January 2018 census to 2,882 in the January 2019 census. Take up of 4 year olds decreased from 3,080 in the January 2018 census to 3,022 in the January 2019 census. Take up of the 30 hours childcare offer increased from 1,130 codes issued in January 2018, to 1,277 codes issued in January 2019.

The January 2019 census indicated that there were 353 children who took up early years pupil premium – a reduction compared to the previous census of 430 children in January 2018.

SEND provision aligned to the Local Offer

The number of 2 year olds accessing the free entitlement for 2 year olds recorded with SEN support has increased: 47 children recorded in the January 2019, compared to 41 children in January 2018.

The number of funded 3 and 4 year olds that have SEN support has been increasing, from 422 in January 2018 to 481 in January 2019. Funded 3 and 4 year olds with an EHC plan had increased from 36 in January 2018 to 52 in January 2019.

Key Findings from 2019 CSA

- 1 Places for children under 2 are delivered by PVI settings and childminders, with the highest amount of places on offer in the Noel Park ward.
Relevant vacancies, in the PVI sector, in 2019 evidently most frequently exist in the wards of Woodside and Bruce Grove.

Conversely, analysis of waiting lists for this age group indicates that there is a notable demand for places, in the PVI sector, in the wards of West Green and Fortis Green.
- 2 The highest number of resident 2 year olds are living in the following three (neighbouring, eastern) wards of the London Borough of Haringey: Seven Sisters, Tottenham Hale and Northumberland Park.
Places for 2 year old children are delivered by PVI settings, childminders and maintained nursery classes. Via these three types of providers, there are c2,500 places accessible.
There are however a relatively high level of vacancies amongst PVI settings for 2 year olds in the South East Tottenham Network Learning Community wards of Tottenham Hale and Bruce Grove.
In contrast the three wards which accounted for the highest number of *eligible* 2 year olds in early 2019 were: Seven Sisters, Northumberland Park and White Hart Lane.
- 3 The highest number of 3 and 4 year olds are resident in the three wards of Seven Sisters, Tottenham Hale and Northumberland Park. Additionally those three wards account for the highest birth rates, in 2016.
Universal 15 hours free entitlement places for 3 and 4 year olds are delivered by PVI settings, childminders and maintained nursery classes. There are c3,250 places delivered with a majority of the places from the PVI settings and the maintained nursery classes. There are a number of relatively high waiting lists for some private sector nurseries in Highgate and Muswell Hill wards for 3 and 4 year olds – and a relatively high level of vacancies within the Haringay and West Green wards for all PVI sector providers.
- 4 30 hours childcare offer places for 3 and 4 year olds are delivered by PVI settings, childminders and maintained nursery classes. There are c1,150 places delivered with a majority of the places accessible from the PVI settings. There are a relatively high level of vacancies within the Bounds Green and Seven Sisters wards for all PVI sector providers.
- 5 The Providers Audit for the 2019 Childcare Sufficiency Assessment indicated that there is little childcare available across the weekends. Most setting open by 8.00am on weekdays and stay open until 6.00pm.

- 6 The highest number of 5 – 14 year olds are resident (in order of frequency) in the following three wards (in the eastern vicinity of the borough): Seven Sisters ward, Northumberland Park ward, Tottenham Hale ward.

As is a London-trend, the resident population of older school-aged children is forecast to increase at a greater rate than the population of young (pre-school aged) children. Indeed the Office of National Statistics (as with other north London borough's) forecast a decrease in the population of children aged 3 – 4 years and children aged 2 year olds up to 2025 – see Table 4, page 21.

- 7 The following three wards account for the highest frequency of adults in employment – and it can therefore be assumed *working families*: Harringay, Crouch End and St Ann's. The following three wards account for the *lowest* frequency of adults not in work: Tottenham Green, Tottenham Hale and Northumberland Park (which has the highest unemployment rates in the borough).

- 8 As with the majority of London borough's, a particular locality of the borough has been designated as a Mayor's Housing Zone – in this case the Tottenham vicinity, which via the Tottenham 'zone' and the North Tottenham 'zone' will eventual yield a combined total of 2,565 new dwellings, incorporating the Hale Village site. Essentially, new homes and new employment opportunities will increase demand for childcare.

- 9 The 2019 CSA Providers Audit indicated a number of valuable and informative intelligence about Haringey's childcare market. For example, on the subject of 2 year olds, all applicable early years childcare providers/settings and registered childminders were asked: *How would a reduction in the 2 year old free entitlement funding rate affect your ability to provide such provision?*

- 21% of applicable PVI settings stated: it would make no difference
- 79% of applicable PVI settings stated: we might have to reduce the number of places we offer. 100% of such settings provided this response in the Hornsey/Stroud Green Network Learning Community
- 0 of applicable maintained nursery classes stated: it would make no difference
- 100% of applicable maintained nursery classes stated: we might have to reduce the number of places we offer
- 39% of applicable registered childminders stated: it would make no difference
- 61% of applicable registered childminders stated: we might have to reduce the number of places we offer – and were most frequently located in the Haringey/West Green Network Learning Community

On the emerging subject of the 30 hours childcare offer, 84% of respondent early years childcare providers stated that they were offering 30 hours and the three wards that accounted for the highest number of places offered were Noel Park, Woodside and Fortis Green.

PVI settings with the highest *take up* of 30 hours places were in Noel Park, Fortis Green and Woodside ward.

Maintained nursery classes/schools had the highest take up in the following three wards, White Hart Lane, St Ann's and West Green.

Childminders had the highest take up in the following three wards, Noel Park, Woodside and St Ann's.

All *responding* and applicable (a) early years childcare providers/settings – i.e. PVI settings and maintained nursery classes/nursery schools – and (b) registered childminders were requested to outline what they believed (any) key challenges had been in terms of their implementation and delivery of the 30 hours childcare offer in its first year of *full* national roll-out, including across the London Borough of Haringey. The most frequent statement was (words to the effect): *“The initial issuing of eligibility codes and the system of reconfirmation”*.

For example, specific feedback included:

“We spend so much time chasing parents about re-confirmation”.

“The need to chase parents for their eligibility codes is very time consuming”.

“We see many parents who do not understand the eligibility process”.

The second most frequent statement was (words to the effect): *“the [hourly] funding rate per child should be higher”*. For example, specific feedback included:

“We have had parents come to us and expect the place to be delivered and all totally for free”.

The third most frequent statement was (words to the effect): *“the [hourly] funding rate per child should be higher”*. (Indeed, such feedback was provided by 1 : 5 applicable registered childminders, including those that were delivering the 30 hours childcare offer in 2019).

By a significant margin, the most frequent barrier that early years (funded) childcare providers reported that – in their experience – parents had faced during the first 18 months of roll-out of the 30 hours childcare offer was: problems and complications associated with receiving an eligibility code, which could deter parents or make them unenthused to follow up on initial interest.

In terms of the childminding sector, 20% of responding registered childminders stated that they did not anticipate being in business in 3 years time – a percentage that was aligned to ‘natural churn’, as evidencing by average national percentages.

All responding early years childcare providers/settings and registered childminders were requested to outline whether, during the period 2016 – 2019, they had witnessed any *notable* (and new) trend(s) – including in terms of the circumstances of and backgrounds of families accessing their provision.

46% of PVI settings responded that since 2016, they *had* witnessed a *notable* trend(s). The three most frequent types of trends stated by early years childcare providers/settings were (in order of frequency):

1. Receipt of more *“enquiries”* for places for babies

2. An increased incidence of parents saying that they are unable to afford fees
3. An evolving demand for the 30 hours childcare offer

57% of maintained nursery classes responded that since 2016, they *had* witnessed a *notable* trend(s). The five most frequent types of trends stated by early years childcare providers/settings were (in order of frequency):

1. An increased demand for longer/extended hours of care
2. An increased demand for full-time hours of care
3. An evolving demand for the 30 hours childcare offer

45% of registered childminders responded that since 2016, they had witnessed a *notable* trend(s).

The three most frequent types of trends stated by registered childminders were:

1. An *decreased* demand – in general – including for funded entitlement places
2. We are aware of more parents preferring to access setting-based early years childcare
3. An increased demand for longer/extended hours of care

In terms of the out of school childcare sector, 55% of after school clubs responded that since 2016, they *had* witnessed a *notable* trend(s).

The three most frequent types of trends stated by such providers/settings were (in order of frequency):

1. Generally demand has increased
2. A higher incidence of *working* parents are enquiring about a place
3. Parents with zero hours contracts require more flexibility

34% of breakfast clubs responded that since 2016, they *had* witnessed a *notable* trend(s). The three most frequent types of trends stated by such providers/settings were (in order of frequency):

1. Generally demand has increased
2. A higher incidence of parents requesting a pre-8am opening time
3. More requests to take 3 year old children

33% of holiday playschemes responded that since 2016, they *had* witnessed a *notable* trend(s). The two most frequent types of trends stated by such providers/settings were (in order of frequency):

1. A higher incidence of parents who struggle to afford fees
2. A discernible increase in demand from carers of children with SEND

Finally, *all* responding (a) early years childcare providers/settings and (b) registered childminders and (c) out of school childcare providers were asked what they considered were the key challenges that the early years childcare sector in the London Borough of Haringey faces in terms of providing suitable and quality childcare for carers/parents and their children with SEND? The most frequent response was (words to the effect): "*Difficulties in securing funding for additional SEND support*".

The second most frequent response was (words to the effect, especially from registered childminders): "*Physical access issues – including for wheelchair using young children*". The third most frequent response was (words to the effect): "Difficulties in finding settings where a professional/a childminder is appropriately trained".

- 10 The 2019 CSA Parents/Carers survey accounted for 744 responses and also indicated a number of valuable and informative intelligence about Haringey's childcare market. Table 1 below shows the number of responding parents/carers who were raising children who were of specific ages:

Table 1 - Percentages of parents who stated a particular scenario aligned to them having at least one child aged 0 – 4 years and/or one child aged 5 – 19 years

Scenario	Number Those with at least one 0 – 4 year old	Percentage Those with at least one 0 – 4 year old	Those with at least one 5 – 17 year old	Percentage Those with at least one 5 – 17 year old
Scenario 1= Use Formal registered childcare only	273	52%	86	38%
Scenario 2 = Use Formal registered and Informal unregistered childcare	43	8%	17	7.5%
Scenario 3 = Do not use any Formal registered childcare, but may use Informal unregistered childcare	203	39%	122	54%

In terms of the evolving 30 hours childcare offer, 4 out of 10 parents of 3 and 4 year olds who responded to the 2019 Childcare Sufficiency Assessment Parents/Carers Survey were in early 2019 accessing a 30 hours childcare offer place. Approximately 60% of such parents were not accessing a 30 hours childcare offer place at that time. Of the responding parents who were accessing the 30 hours childcare offer in early 2019, 80% stated that doing so had helped themselves or a partner to remain in work/employment. Where parents were accessing 30 hours they most frequently lived in the west of the borough.

The most frequent incidence of the statement: *I am not accessing the 30 hours childcare in early 2019 because I think that I am not eligible* was made observed from respondents who were resident in the Tottenham locality.

In terms of the question: *If you were to use the 30 hour childcare offer in the future, where do you think the main place you would use it would be?* – a PVI setting was denoted by applicable responding parents/carers with the highest frequency.

In terms of the question: *Why are you not accessing the universal 15 hours free entitlement for 3 and 4 year olds?* – the most frequent response was (words to the effect): *“because I am now accessing the 30 hours childcare offer”*.

In terms of the question: *Why are you not accessing the free entitlement for 2 olds?* – the most frequent response was (words to the effect): *“because I am not eligible”*, and

this response was most frequently stated by parents/carers who were resident in the west of the borough.

Finally, parents/carers who were accessing at least one type of free entitlement were asked: What times of (a typical week) day would you prefer to use a free, funded entitlement, early learning and childcare place?

The most frequent response was 8am – 6pm (42% of applicable parents), followed in frequency by: half day, either morning or afternoon (27% of applicable parents). The response 8am – 6pm was most frequently stated by applicable parents who were resident in the following wards, Bruce Grove, Seven Sisters, Tottenham Green and Tottenham Hale.

1 Demand for childcare

This Section 1 of the 2019 Haringey Childcare Sufficiency Assessment focuses on the demand for early years childcare and out of school childcare aligned to three types of analysis/feedback:

- a) Key demographic factors that affect the borough's early years and childcare market;
- b) (Demand themed) Outcomes/feedback from a Providers Audit
- c) (Demand themed) Outcomes/feedback from a Parents/Carers Survey

a) Demand analysis – Key Demographic Factors affecting the childcare market

The following section presents an analysis which focuses on how demographic and socio-economic factors may affect forthcoming localised demand for childcare places, and the three types of funded early years entitlements.

The data sets and relevant metrics are aligned to the borough's 19 wards and its six Network Learning Communities² – including:

- Existing 0 – 14 years populations and projections/forecasts
- Birth rates since 2015 and 2016 in order to help inform forthcoming potential (demographic) demand for 30 hours childcare offer provision
- Migration data
- Incidence of working families (that are eligible to take-up the 30 hours childcare offer) and average household incomes
- Incidence of children and young people from low income families
- Incidence of children with SEND
- Incidence of major new housing developments

A key objective of the following narrative and analysis is to consider the extent to which *childcare planners* within the borough may need to (continue to) prioritise its abilities to help instigate/stimulate *further* 30 hours childcare places/provision within specific/targeted geographical localities.

² <https://www.haringey.gov.uk/children-and-families/schools-and-education/projects-consultations-and-inspections/networked-learning-communities-nlc>

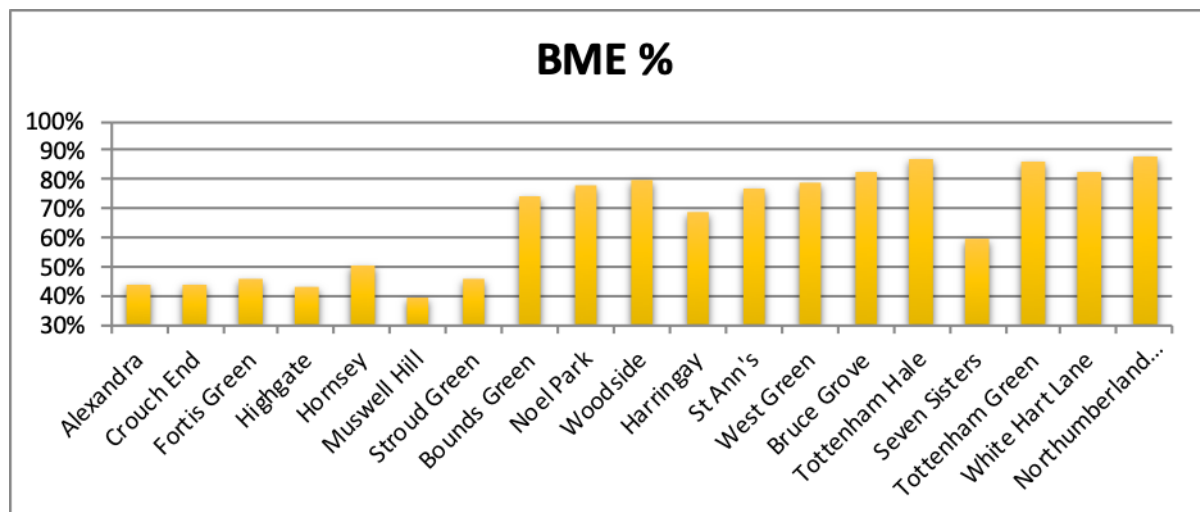
1.1 Haringey in context

- 1.1.1 The London Borough of Haringey's population is increasing. It is a highly diverse population with 67% residents identifying as non-white British ethnic groups, White Other (29%), Black (17%), Asian (9%), Mixed (7%). There are over 180 languages spoken in the borough. Nearly one in five of the population is aged 0 – 17 years of age. Additionally the borough is the 7th most deprived authorities in London. Unemployment is relatively higher than London, 19.8 compared to 5.4 (APS 2017). However, the local authority has ambitious plans for housing and employment growth, with a focus on the Tottenham locality.

The most highly populated wards of 0 – 4 year olds are in the east of the borough with Northumberland Park and Seven Sisters wards accounting for the highest population of such children.

The west of the borough has the highest concentration of White British 0 – 4 years in the borough with Alexandra, Crouch End and Fortis Green wards having particularly high cohorts. The east of the borough has a high concentration of BME families with the Northumberland Park, Tottenham Green and Tottenham Hale wards accounting for the highest numbers:

Diagram 1 - Percentage of resident 0 – 4 year olds from Black and Minority Ethnic communities (BME) aligned to Haringey ward (source: NOMIS 2017)



The table overleaf indicates a further metric breakdown, via the Office of National Statistics (2011) of the ethnicity of children and young people resident in the London Borough of Haringey.

Ethnic Group	Alexandra	Bounds Green	Bruce Grove	Crouch End	Fortis Green	Haringey	Highgate	Homsey	Muswell Hill	Noel Park	Northumberland Park	Seven Sisters	St Ann's	Stroud Green	Tottenham Green	Tottenham Hale	West Green	White Hart Lane	Woodside
All Categories: Ethnic group	860	922	1,125	815	829	853	694	806	633	875	1,333	1,464	1,004	705	1,083	1,231	854	1,009	1,017
White: English/Welsh/Scottish/Northern Irish	477	232	198	458	445	265	391	397	382	188	162	588	232	379	148	158	181	171	201
White: Irish	9	9	3	13	15	7	4	9	6	3	2	3	4	12	2	5	2	8	14
White: Gypsy or Irish Traveller	0	0	5	0	0	2	0	2	0	2	2	1	7	0	6	6	2	4	6
White: Other White	124	236	216	102	121	156	100	98	87	185	265	316	192	97	243	227	187	203	246
Mixed/multiple ethnic group: White	38	47	51	14	22	30	29	26	22	61	76	25	39	23	60	73	34	39	42
Mixed/multiple ethnic group: White	18	32	28	23	12	29	6	12	10	20	53	13	38	12	29	42	29	23	22
Mixed/multiple ethnic group: White	73	39	17	57	49	36	52	44	57	27	12	28	22	23	38	24	25	33	39
Mixed/multiple ethnic group: Other	34	45	64	64	40	56	52	42	25	43	49	38	55	33	38	43	54	44	57
Asian/ Asian British: Indian	12	23	17	9	17	8	8	4	9	16	8	13	15	1	5	13	8	7	29
Asian/Asian British: Pakistani	5	8	7	6	3	9	4	4	1	7	7	3	11	1	4	14	9	11	19
Asian/Asian British: Bangladeshi	4	20	41	2	3	43	1	9	2	31	25	27	52	6	32	30	29	40	47
Asian/Asian British: Chinese	6	10	22	4	11	13	6	5	3	26	17	21	16	9	27	24	20	14	22
Asian/Asian British: Other Asian	6	26	35	18	20	27	0	15	0	33	42	22	32	8	26	27	19	34	27

Table 2 - Numbers of children and young people from specific ethnicities that are resident in the London Borough of Haringey (source: ONS 2011)

- 1.1.2 The 2018 Haringey School Places Planning Report highlighted a projected increase in the 0 – 3 years populations in wards in the east of borough – including in the Northumberland Park ward and the Tottenham locality.
- 1.1.3 Table 2 indicates the number of children estimated to be resident in each of the London Borough of Haringey's 19 wards and its six Network Learning Communities– as per ONS estimates for 2017 – aligned to the following age groups: (a) 0 – 4 years (b) 5 – 9 years (c) 10 – 14 years.

Table 3 - Approximate number of children and young people aged 0 – 14 years resident in each of the London Borough of Haringey's 19 wards in 2018
(source: Office of National Statistics 2017)

Ward	Number of Resident 0 – 14 year olds	Number of Resident 0 - 4 year olds	Number of Borough's Resident 5 – 9 year olds	Number of Resident 10 - 14 year olds	Percentage of Borough's Resident 0 - 14 Year olds
Muswell Hill/Highgate Network Learning Community					
Alexandra	2,541	781	919	841	4.9%
Fortis Green	2,550	826	846	878	4.9%
Highgate	1,826	740	520	566	3.5%
Muswell Hill	1,893	634	682	577	3.7%
Total NLC	8,810	2,981	2,967	2,862	17%
Hornsey/Stroud Green Network Learning Community					
Crouch End	2,052	845	704	503	4%
Hornsey	2,280	963	721	596	4.4%
Stroud Green	1,753	720	496	537	3.4%
Total NLC	6,085	2,528	1,921	1,636	11.8%
Wood Green Network Learning Community					
Bounds Green	2,708	1,072	866	770	5.2%
Noel Park	2,616	956	842	818	5.1%
Woodside	2,826	1,087	893	846	5.5%
Total NLC	8,150	3,115	2,601	2,434	15.5%
Harringay/West Green Network Learning Community					
Harringay	2,122	950	654	518	4.1%
St. Ann's	2,626	1,026	844	756	5.1%
West Green	2,496	930	833	733	4.8%
Total NLC	7,244	2,906	2,331	2,007	14%
North East Tottenham Network Learning Community					
Northumberland Park	4,048	1,441	1,313	1,294	7.8%
White Hart Lane	2,937	935	943	1,059	5.7%
Total NLC	6,985	2,376	2,256	2,353	13.5%
South East Tottenham Network Learning Community					
Bruce Grove	2,944	1,035	984	925	5.7%
Seven Sisters	4,529	1,554	1,590	1,385	8.8%
Tottenham Green	3,073	1,205	946	922	5.9%
Tottenham Hale	3,771	1,293	1,252	1,226	7.3%
Total NLC	14,317	5,087	4,772	4,458	27.7%
Total Haringey	51,588	18,990	16,848	15,750	100%

Table 3 indicates that the highest number of 0 – 4 year olds are evidently resident (in order of frequency) in the following three wards (in the eastern vicinity of the borough):

1. Seven Sisters ward
2. Northumberland Park ward
3. Tottenham Hale ward

The lowest number of 0 – 4 year olds are evidently resident (in order of frequency) in the following three wards (in the western vicinity of the borough):

1. Muswell Hill ward
2. Stroud Green ward
3. Highgate ward

Table 3 also indicates that the highest number of 5 – 9 year olds are evidently resident (in order of frequency) in the following three wards (in the eastern vicinity of the borough):

1. Seven Sisters ward
2. Northumberland Park ward
3. Tottenham Hale ward

The lowest number of 5 – 9 year olds are evidently resident (in order of frequency) in the following three wards (in the western vicinity of the borough):

1. Highgate ward
2. Harringay ward
3. Muswell Hill ward

Finally, Table 3 indicates that the highest number of 10 – 14 year olds are also evidently resident (in order of frequency) in the following three wards:

1. Seven Sisters ward
2. Tottenham Hale ward
3. Northumberland Park ward

The lowest number of 10 – 14 year olds are evidently resident (in order of frequency) in the following three wards (in the western vicinity of the borough):

1. Crouch End ward
2. Stroud Green ward
3. Highgate ward

- 1.1.4 Table 4 below indicates that the population of older school-aged children in the borough is forecast to increase at a greater rate than the population of young (pre-school aged) children.

Table 4 - Numbers of children forecast to be resident in the London Borough of Haringey by 2025 (source: Office of National Statistics 2016)

Age cohort	Resident Population 2018	Resident Population 2021	Number change 2018 – 2021	Resident Population 2025	Number change 2018 – 2025
0 – 1 years	7,758	7,810	52	7,709	-49
2 years	3,784	3,703	-81	3,659	-125
3 – 4 years	7,388	7,072	-316	7,050	-338
5 – 7 years	23,680	24,232	+552	23,879	+199
8 – 11 years	21,730	22,528	+798	23,418	+1,688
12 – 18 years	64,340	65,345	+1,005	65,715	+1,375
Total 0 – 18	7,758	7,810	+52	7,709	-49

1.2 Birth rates in the London Borough of Haringey

The 2018 Haringey School Places Planning Report outlined that since 2002 the number of births in the west of the borough had fallen from 1,135 (2002) to 1,073 (2016).

This contrasted with births in the east of the borough that had risen from 2,596 (2002) to 3,041 (2016).

Table 5 presents the number of live births that were recorded in the London Borough of Haringey in the years 2015 and 2016, in each of its nineteen wards.

Table 5 - Birth rates in the London Borough of Haringey in 2015 and 2016 (ONS 2019)

Ward	Live births in 2015	Live births in 2016
Network Learning Community: Highgate/Muswell Hill		
Alexandra	133	112
Muswell Hill	128	119
Fortis Green	146	131
Highgate	131	131
Total NLC	538	493
Network Learning Community: Hornsey/Stroud Green		
Crouch End	152	196
Hornsey	182	216
Stroud Green	149	168
Total NLC	483	580

Ward	Live births in 2015	Live births in 2016
Network Learning Community: Wood Green		
Bounds Green	213	206
Noel Park	217	221
Woodside	285	229
Total NLC	715	656
Network Learning Community: Harringay/West Green		
Harringay	245	217
St. Ann's	237	236
West Green	209	191
Total NLC	691	644
Network Learning Community: North East Tottenham		
Northumberland Park	322	332
White Hart Lane	208	207
Total NLC	530	539
Network Learning Community: South East Tottenham		
Bruce Grove	278	273
Seven Sisters	324	355
Tottenham Green	249	290
Tottenham Hale	298	284
Total NLC	1,149	1,202
Total Haringey	4,106	4,114

Table 5 indicates that the following three wards within the (eastern vicinity of the) borough had the highest birth rates, in 2015 and 2016 – i.e. proportions of resident children (closing in on) children eligible for a funded childcare place:

1. Seven Sisters ward
2. Northumberland Park ward
3. Tottenham Hale ward

1.3 Migration

Table 6 demonstrates the apparent trend for the London Borough of Haringey in terms of *international* migration inflows and outflows and *internal* (within the UK) migration inflows and outflow.

Table 6 - London Borough of Haringey (a) international migration and (b) internal migration inflows and outflows trends observed since 2012 – 2013 up to 2016 – 2017 (source: ONS 2018)

Year	2012 – 2013	2013 – 2014	2014 – 2015	2015 – 2016	2016 – 2017
International Migration					
Inflows					
Haringey	6,766	8,230	8,259	7,840	7,480
Outflows					
Haringey	3,266	3,455	3,053	3,582	4,460
Net migration churn	3,500	4,775	5,206	4,258	3,020
Internal Migration					
Inflows					
Haringey	19,699	20,626	20,746	21,313	22,469
Outflows					
Haringey	23,191	25,038	24,979	24,701	29,113
Net migration churn	-3,492	-4,409	-4,233	-3,388	-6,644

Table 6 indicates that in terms of international migration, there is a surplus of *inward* flow, indeed at an accelerating rate. However in terms of people who are already resident in the UK, more were moving out of the locality than were moving in. The trend however – which is observable within other North London boroughs – is that (the greater level of overall) inward migration is – in all probability – including a tangible number of young families – including those for whom English is not the first language spoken in the home.

1.4 Employment

Economic inactivity refers to people who are neither in work nor employed. This group includes, for example, those looking after a home or retired. Economic inactivity rates in Haringey are higher than found across London and GB as a whole, and of the working age population that is economically inactive, a lower percentage want a job:

Table 7 - Economic inactivity rates April 2018 – March 2019 (source: NOMIS 2019)

Circumstance	Haringey	London	UK
All people economically active	77.2%	78.1%	78.7%
All people economically inactive	22.8%	21.9%	21.3%
Wanting a job	15.6%	20.8%	20.6%
Not wanting a job	84.4%	79.2%	79.4%

In London a higher proportion of employee jobs are full-time (approximately three-quarters) but in Haringey it is 65.7%. Correspondingly, there are a higher proportion of part-time jobs in the borough, compared to the rest of London – see Table 8.

Table 8 - Employee jobs (2017) (source: NOMIS 2019)

Indicator	Haringey	London	UK
Total employee jobs	70,000	n/a	n/a
Full-time	65.7%	73%	67.5%
Part-time	34.3%	27%	32.5%

Table 9 (overleaf) indicates that the following three (south-central locality, Haringey/West Green Network Learning Community) wards account for the highest frequency of adults in employment – and it can therefore be assumed *working families*:

1. Harringay ward
2. Crouch End ward
3. St. Ann's ward

Table 9 - Incidence of employment and unemployment in the London Borough of Haringey's wards (NOMIS 2018 using ONS 2011 data)

Ward	Economically Active	Unemployed
Network Learning Community: Highgate/Muswell Hill		
Alexandra	6,561	372
Muswell Hill	6,247	325
Fortis Green	6,828	405
Highgate	7,039	335
Total NLC	26,675	1,437
Network Learning Community: Hornsey/Stroud Green		
Crouch End	7,942	405
Hornsey	7,452	699
Stroud Green	7,479	497
Total NLC	22,873	1,601
Network Learning Community: Wood Green		
Bounds Green	7,622	800
Noel Park	7,258	876
Woodside	7,800	808
Total NLC	22,680	2,484
Network Learning Community: Harringay/West Green		
Harringay	8,088	684
St. Ann's	7,871	833
West Green	6,842	853
Total NLC	22,801	2,370
Network Learning Community: North East Tottenham		
Northumberland Park	6,115	1,201
White Hart Lane	5,584	858
Total NLC	11,699	2,059
Network Learning Community: South East Tottenham		
Bruce Grove	7,097	905
Seven Sisters	7,516	845
Tottenham Green	7,462	1,083
Tottenham Hale	6,842	1,026
Total NLC	28,917	3,859
Total Haringey	135,645	13,810

Table 10 presents the average income in the London Borough of Haringey's 19 wards as published by the Greater London Authority in July 2015.

Table 10 - Average annual household incomes in the London Borough of Haringey's 19 wards (source: Greater London Authority in July 2015)

Ward	Average annual household incomes
Network Learning Community: Highgate/Muswell Hill	
Alexandra	£51,450
Fortis Green	£49,950
Highgate	£53,710
Muswell Hill	£53,910
Average NLC	£52,255
Network Learning Community: Hornsey/Stroud Green	
Crouch End	£52,070
Hornsey	£40,260
Stroud Green	£44,780
Average NLC	£45,703
Network Learning Community: Wood Green	
Bounds Green	£34,550
Noel Park	£30,620
Woodside	£32,010
Average NLC	£32,393
Network Learning Community: Harringay/West Green	
Harringay	£37,150
St. Ann's	£32,460
West Green	£31,110
Average NLC	£33,573
Network Learning Community: North East Tottenham	
Northumberland Park	£25,090
White Hart Lane	£27,010
Average NLC	£26,050
Network Learning Community: South East Tottenham	
Bruce Grove	£30,340
Seven Sisters	£33,500
Tottenham Green	£28,920
Tottenham Hale	£27,340
Total NLC	£30,025
Average for the London Borough of Haringey	£37,696

Table 10 indicates that the three wards which accounted for the *highest* average household incomes were (situated in the south west of the borough, Highgate/Muswell Hill Network Learning Community and) were:

1. Muswell Hill ward
2. Highgate ward
3. Crouch End ward

Table 10 indicates that the three wards which accounted for the *lowest* average household incomes were (situated in the North East of the borough/North East Network Learning Community) were:

1. Northumberland Park ward
2. White Hart Lane ward
3. Tottenham Hale ward

1.5 Incidence of children and young people from low income families

- 1.5.1 In 2015, 12 of the London Borough of Haringey's 19 wards were within the most deprived 20% in England.

They are located predominantly in the east of the borough. Indeed in 2015, Northumberland Park ward was among the 2 – 3% most deprived nationally.

Table 11 indicates that the four wards which accounted for the highest proportions of children aged under 16 years who were members of low income families in 2014 (were situated predominantly in the north-central vicinity of the borough and) were:

1. White Hart Lane
2. Northumberland Park
3. West Green
4. Noel Park

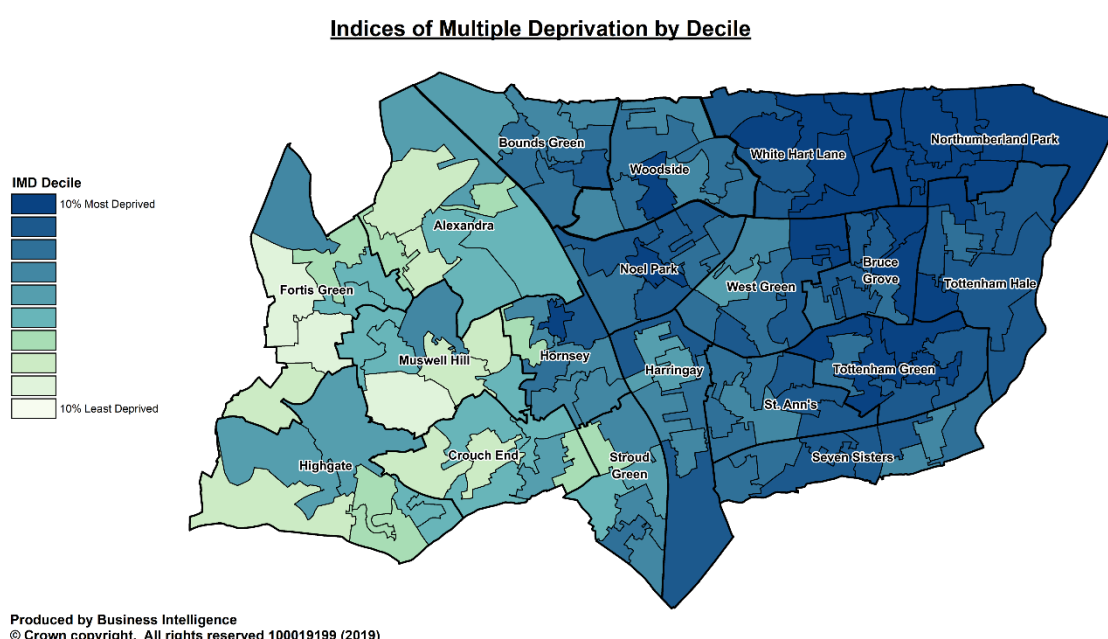
Table 11 - Percentage of (under 16 years) children from low income families
(Source: HMRC Children in Poverty for Boroughs and Wards in London 2014)

Ward	Number of children in families in receipt of Child Tax Credit (<60% median income) or IS/JSA	Number of children in Child Benefit families	Percentage of children from low-income families
Network Learning Community: Highgate/Muswell Hill			
Alexandra	625	2,580	24.1%
Fortis Green	460	2,100	21.8%
Highgate	560	2,195	25.4%
Muswell Hill	860	2,570	33.4%
Network Learning Community: Hornsey/Stroud Green			
Crouch End	260	2,495	10.4%
Hornsey	140	1,655	8.5%
Stroud Green	1,135	3,195	35.5%
Network Learning Community: Wood Green			
Bounds Green	1,035	3,415	30.2%
Noel Park	1,425	3,965	36%
Woodside	625	2,580	24.1%
Network Learning Community: Harringay/West Green			
Harringay	385	1,750	22.1%
St. Ann's	1,025	4,995	20.5%
West Green	1,365	3,480	39.2%
Network Learning Community: North East Tottenham			
Northumberland Park	1,455	3,230	45.1%
White Hart Lane	1,050	2,135	49.2%

Network Learning Community: South East Tottenham			
Bruce Grove	165	1,830	9.1%
Seven Sisters	340	1,705	19.8%
Tottenham Green	1,490	4,305	34.6%
Tottenham Hale	865	2,695	32.1%

Diagram 2 below, is based on the Income Deprivation Affecting Children Index (IDACI) which measures the proportion of all children aged 0 – 15 living in income deprived families within the London Borough of Haringey.

Diagram 2 – Proportion of all children aged 0 – 15 living in income deprived families within the London Borough of Haringey



The Income Deprivation Affecting Children Index is the official measure of relative deprivation for small areas (or neighbourhoods) in England. It ranks every small area in England from 1 (most deprived area) to 32,844 (least deprived area). Haringey ranks as 21st most deprived borough in England and the 7th most deprived in London. The most deprived areas in Haringey are situated to the east of the borough – notably the wards of White Hart Lane, Northumberland Park, Bruce Grove and Tottenham Hale.

- 1.5.2 Since April 2015, childcare providers delivering the 15 hours universal free entitlement for 3 and 4 year olds have been able to apply for additional funding of up to £302.10 per year, per eligible child, to support households on lower income. Rates of take up were 353 in January 2019 census. In terms of the locations of such households, Table 12 shows the number of children living in Out-of-work Benefit Claimant Households by ward and Network Learning Community.

Table 12 - Number of children living in Out-of-work Benefit Claimant Households by ward and Network Learning Community (source: London Borough of Haringey 2019)

Ward	Age 0 – 4yrs (May 2017) ³
Network Learning Community: Highgate/Muswell Hill	
Alexandra	40
Fortis Green	50
Highgate	15
Muswell Hill	10
Average NLC	115
Network Learning Community: Hornsey/Stroud Green	
Crouch End	40
Hornsey	105
Stroud Green	65
Average NLC	210
Network Learning Community: Wood Green	
Bounds Green	120
Noel Park	155
Woodside	275
Average NLC	550
Network Learning Community: Harringay/West Green	
Harringay	125
St. Ann's	165
West Green	165
Average NLC	455
Network Learning Community: North East Tottenham	
Northumberland Park	360
White Hart Lane	175
Average NLC	535
Network Learning Community: South East Tottenham	
Bruce Grove	230
Seven Sisters	170
Tottenham Green	275
Tottenham Hale	265
Total NLC	940

³ Source: <https://www.gov.uk/government/statistics/children-in-out-of-work-benefit-households-31-may-2017>

- 1.5.3 The metrics detailed in Table 12 above follow the same trends as the other 'deprivation' indicators, with a clear contrast between east and west of the borough – as do the metrics presented in Table 13 which show the number of 0 – 4 year olds living in temporary accommodation, in the borough, at March 2019.

Table 13 - Number of 0 – 4 year olds living in temporary accommodation, in the borough, at March 2019 (source: Homes for Haringey, March 2019)

Ward	Count of 0 – 4 year olds
Network Learning Community: Highgate/Muswell Hill	
Alexandra	1
Fortis Green	31
Highgate	3
Muswell Hill	9
Average NLC	44
Network Learning Community: Hornsey/Stroud Green	
Crouch End	4
Hornsey	20
Stroud Green	12
Average NLC	36
Network Learning Community: Wood Green	
Bounds Green	28
Noel Park	20
Woodside	39
Average NLC	87
Network Learning Community: Harringay/West Green	
Harringay	23
St. Ann's	68
West Green	51
Average NLC	142
Network Learning Community: North East Tottenham	
Northumberland Park	145
White Hart Lane	27
Average NLC	172
Network Learning Community: South East Tottenham	
Bruce Grove	54
Seven Sisters	25
Tottenham Green	88
Tottenham Hale	71
Total NLC	238

It can be noted that there is a relatively high number of homeless households, with 0 – 4 year olds, in Northumberland Park ward compared to the other wards in the east of the borough.

1.6 Education

- 1.6.1 Table 14 shows the percentage of pupils achieving *Good Level of Development* at the end of Early Years Foundation Stage, by ward, in 2018. The Table, shows a disparity in attainment can be observed when comparing the east of the borough with the west of the borough where more families have English as an additional language and there are more children with Special Educational Needs.

Table 14 - Percentage of pupils achieving a good level of development at the end of Early Years Foundation Stage by ward (source: GDL 2018)

Wards	Numbers of pupils							
	All	Girls	Boys	FSM	Not FSM	EAL	SEN	BME
Network Learning Community: Highgate/Muswell Hill								
Alexandra	141	74	67	5	136	132	12	79
Fortis Green	154	69	85	9	145	144	9	80
Highgate	61	34	27	1	60	52	4	24
Muswell Hill	94	42	52	1	93	87	5	43
Network Learning Community: Hornsey/Stroud Green								
Crouch End	110	50	60	3	107	101	8	51
Hornsey	125	64	61	12	113	122	13	71
Stroud Green	71	37	34	5	66	69	6	39
Network Learning Community: Wood Green								
Woodside	126	59	67	14	112	123	7	108
Bounds Green	133	66	67	11	122	133	14	107
Noel Park	135	62	73	27	108	133	19	111
Network Learning Community: Harringay/West Green								
Harringay	116	61	55	10	106	109	8	58
West Green	141	67	74	29	112	137	15	110
St. Ann's	145	64	81	25	120	141	9	107
Network Learning Community: North East Tottenham								
Northumberland Park	244	108	136	55	189	231	52	222
White Hart Lane	143	75	68	36	107	139	21	127
Network Learning Community: South East Tottenham								
Tottenham Hale	219	106	113	47	172	212	29	195
Seven Sisters	93	43	50	17	76	92	15	78
Tottenham Green	174	87	87	43	131	172	20	157
Bruce Grove	157	74	83	31	126	149	25	139
Not known								
n/a	519	244	275	53	466	443	40	327
Haringey								
Grand Total	3,101	1,486	1,615	434	2,667	2,921	331	2,233

1.7 Incidence of children with SEND

The London Borough of Haringey provides a fund known as the Early Years Inclusion Fund available to 2 year olds and 3 and 4 year olds, to which all Haringey childcare providers can apply in order to receive additional funding to support them to meet a SEND child's needs. The fund, often called top up, is paid at a high rate (£6.91 per hour per child) and low rate (£1.95 per hour per child), dependent on need. In summer 2019 there were 14, 2 year old children who qualified with 7 of them being medium top up and 7 of them being high top up.

Additionally, there were 126, 3 and 4 year old children who qualified with 45 of them being funded medium top up, of these children 13 were funded for extended top up funding. There were 81 children funded for high top up with 21 of these children being funded for extended top up funding.

Additional to the Early Years Inclusion Fund, the Disability Access Fund (DAF) was introduced in September 2017 and 18 children across PVI and maintained settings accessed the DAF funding in 2019.

The 2018 Haringey School Places Planning Report stated that the number of children and young people with a statement that were resident in the borough is on *an overall upward trajectory*. Evidently in early 2018, there were 1,848 children with statements or education and health care plans resident in the borough. In terms of specific SEND-type need, the numbers of children with ASD (Autistic Spectrum Disorder) had shown the highest increase in numbers. Indeed the number of children with statements has evidently increased year-on-year between 2009 – 2018 and reasons for this are considered to include:

- An increasing population of 0 – 19 year olds
- An increase in the 'staying on' rate of the 16 – 25 years age group – as a result of the increased age range that young people can continue to receive support through their Education Health and Care Plan
- An increase in the number of younger children receiving an Education Health and Care Plan

Table 15 presents the number of primary aged pupils by SEND type resident in the borough as reported by the London Borough of Haringey in early 2018.

Table 15 - Number of primary aged pupils by SEND type in resident in the borough in early 2018 (source: London Borough of Haringey)

SEND type	Number resident in the borough
Autistic Spectrum Disorder	564
Hearing Impairment	31
Moderate Learning Difficulty	250
Multi-Sensory Impairment	2
Physical Disability	91
Profound and Multiple Learning Difficulty	29
Severe Learning Difficulty	32
Social, Emotional & Mental Health	120
Specific Learning Difficulty	21
Speech, Language and Communication Needs	197
Visual Impairment	11

The 2014 Haringey Needs Assessment for children with SEND concluded that in terms of overall long-standing disabilities, at that time there were 1,274 such boys aged 0 – 4 years resident in the borough and 1,157 girls.

The same document also reported that the highest prevalence rates in terms of all children and young people with SEND were observed in the Seven Sisters ward and the Haringay ward, in the eastern vicinity of the borough. The lowest prevalence rates were observed in the Highgate ward, Muswell Hill ward and Crouch End ward which are amongst the least deprived wards in the borough.

1.8 New forthcoming housing developments in the London Borough of Haringey

The London Borough of Haringey School Place Planning Report 2018 and the 2017 Haringey Local Plan identified a number of major forthcoming housing and regeneration projects that will – in all probability – create ongoing phases of increased demand for funded entitlement/childcare places – including 30 hours childcare offer places.

As with the majority of London Borough's, a particular locality of the borough has been designated as a Mayor's Housing Zone – in this case the Tottenham vicinity, which via the Tottenham 'zone' and the North Tottenham 'zone' will eventual yield a combined total of 2,565 new dwellings, incorporating the Hale Village site.

The Haringey School Place Planning Report 2018 outlined how new developments and regeneration initiatives would impact on school's places planning – aligned to specific Planning Areas.

The London Borough of Haringey's Local Plan for 2017 and the Haringey School Place Planning Report 2018 summarised the key housing developments that are set to be established in the borough up to the year 2026⁴. Pages 19 – 20 of London Borough of Haringey's Local Plan for 2017 present housing development/site allocations aligned to ward, and this detail is further supplemented on pages 22 – 23 of the Haringey School Place Planning Report 2018.

Table 16 indicates that the most frequent number of new dwellings are set to be constructed and eventually occupied in the Noel Park ward, followed (closely) in frequency by the Tottenham Hale ward and the Northumberland Park ward. The table also indicates the potential number of *new* early years childcare places for children aged 2, 3 and 4 years that would be required to be established in each ward in order to meet the additional demand theoretically generated by the new occupation of new dwellings. For example, in terms of the Noel Park ward, if a planning yield formula of 0.025 new primary school *Reception places* per number of new dwellings⁵ was applied, this could lead to an additional *approximate* 417 resident children aged 2 – 4 years in that ward at the completion of all of the developments and their phasing, with that figure being aggregated for three age cohorts for this particular methodology.

⁴https://www.haringey.gov.uk/sites/haringeygovuk/files/final_haringey_site_allocations_dtp_online.pdf
Sites in the Tottenham area are addressed in the separate document:

⁵ <http://www.planningservices.haringey.gov.uk/portal/servlets/AttachmentShowServlet?ImageName=505170>

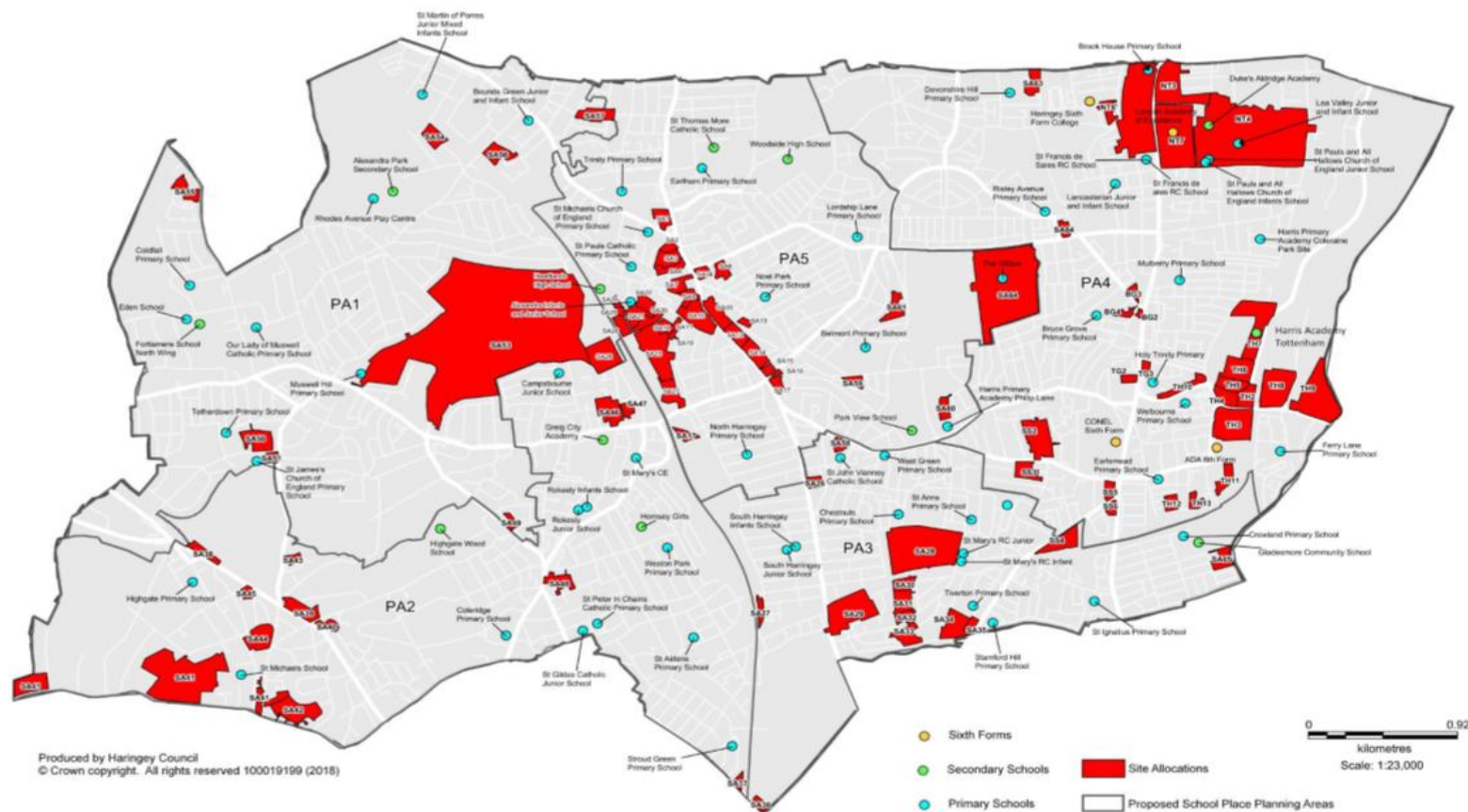
Table 16 - Number of new housing developments set to take place in each of the localities 19 wards up to the year 2026
(primary source: Haringey School Place Planning Report 2018)

Ward	Name of development/site	Number of ongoing – to be completed – dwellings in ward	Potential number of new places for 2, 3 and 4 year olds required aligned to yield formula
Alexandra	Coppetts Wood Hospital site	80	6
	Park Grove and Durnsford Road site	160	12
	Total Ward	240	18
Bruce Grove	13, 5 and 7 Bruce Grove site	42	3
	Bruce Grove Snooker Hall & Banqueting Suite	49	4
	Tottenham Delivery Office site	48	4
	Tottenham Chances & Nicholson Court site	34	3
	Total Ward	173	14
Crouch End	Hornsey Town Hall site	123	9
	Tottenham Lane site	18	1
	Shepherds Hill site	16	1
	Avenue Heights site	17	1
	Total Ward	174	12
Fortis Green	Coppets Wood Hospital site	80	6
	Total Ward	80	6
Harringay	North of Hornsey Rail Depot site	56	4
	Wightman Road site	48	4
	Finsbury Park Bowling Alley site	71	5
	Turnpike Lane Triangle site	41	3
	Hawes and Curtis site on Green Lanes site	133	10
	Steel Stockholders Yard, Hampden Road site	174	13
	Station Interchange site	138	10
	Total Ward	661	49
Highgate	460-470 Archway Road site	72	5
	Gonnermann Antiques and Goldsmiths Court	37	3
	Highgate Bowl site	31	3
	Somersby Road site	45	4
	Hillcrest site	34	3
	Highgate Magistrates Court site	82	6
	191-201 Archway Road site	25	2
	Cranwood Care Home site	35	3
	Total Ward	326	29
Hornsey	Cross Lane site	52	4
	Hornsey Depot site	438	33
	Total Ward	490	37
Muswell Hill	Park Road and Lynton Road site	41	3
	St. Luke's Hospital site	156	12
	Cranwood Care Home site	35	3
	Total Ward	232	18

Ward	Name of development/site	Number of ongoing – to be completed – dwellings in ward	Potential number of new places for 2, 3 and 4 year olds required aligned to yield formula
Noel Park	Clarendon Square Gateway site	195	15
	Clarendon Square site	1,080	81
	Clarendon Road South site	201	15
	North West of Clarendon Square site	29	2
	Land adjacent to Coronation Sidings site	173	13
	Vue Cinema site	99	7
	Mecca Bingo site	209	16
	Morrison's Wood Green site	234	18
	Wood Green Library site	195	14
	The Mall West and East sites	820	61
	Iceland site	84	6
	Bury Road Car Park site	249	19
	Salvation Army site	74	6
	16-54 Wood Green High Road site	420	31
	Land near to Westbury and Whymark Avenue	117	9
	Bittern Place site	173	13
	Land r/o Hornsey Park Road site	72	5
	Coberg Road North site	181	13
	Wood Green Cultural Centre (South) site	341	26
	Wood Green Cultural Centre (North) site	153	11
	Western Rd Car Park site	92	7
	Hornsey Filter Beds site	304	29
	Total Ward	5,495	417
Northumberland Park	Tottenham Hotspur Stadium site	585	44
	Northumberland Park North site	472	35
	Northumberland Park Estate Renewal site	1,929	144
	North of White Hart Lane site	100	8
	Total Ward	3,086	231
St Ann's	St Ann's Hospital site	456	34
	St Ann's Road Police Station site	56	4
	Red House, West Green Road site	28	2
	Gourley Triangle site	191	14
	Total Ward	731	54
Seven Sisters	Seven Sisters and Tewksbury Road site	63	5
	Plevna Crescent site	72	5
	High Road West site	1,200	90
	Arena Retail Park and Design Centre site	579	43
	Crusader Industrial Estate site	64	5
	Omega Works site	40	3
	Vale/Eade Roads site	101	8
	Overbury and Eade Roads site	141	11
	Leabank and Lemsford Close site	65	5
	Total Ward	2,265	175

Ward	Name of development/site	Number of ongoing – to be completed – dwellings in ward	Potential number of new places for 2, 3 and 4 year olds required aligned to yield formula
Stroud Green	Stroud Green Road site	63	5
	Lawrence Road sites	196	15
	Total Ward	259	18
Tottenham Hale	High Road site	42	3
	Park View Road site	12	1
	1 Station Square site	128	10
	Station Square West site	297	23
	Station Square North site	213	16
	Ashley Road South site	444	33
	Ashley Road North site	147	11
	Hale Wharf site	405	30
	Welbourne Centre site	244	18
	Tottenham Police Station & Reynardson Court	22	1
	Tottenham Hale Retail Park site	992	74
	Hale Village site	2,423	182
	Total Ward	5,369	402
Tottenham Green	Lawrence Road site	413	31
	Ward's Corner site	163	12
	Apex House site	(also) 163	12
	Monument Way site	54	4
	Fountayne Road site	113	8
	Herbert Road site	66	5
	Constable Crescent site	(also) 66	5
	Total Ward	1,038	77
West Green	Haringey Professional Development Centre	49	4
	Keston Centre site	126	9
	Barber Wilson site	66	5
	The Roundway site	56	4
	Leabank & Lemsford Close site	65	5
	Turnpike Lane Station site	85	6
	Haringey Professional Development Centre	49	4
	Total Ward	496	37
White Hart Lane	The Selby Centre	n/a	n/a
	Total Ward	n/a	n/a
Woodside	London Borough of Haringey Civic Centre site	116	9
	Green Ridings House site	146	11
	Wood Green Bus Garage site	237	18
	Station Road Offices site	197	15
	The Roundway site	56	4
	Total Ward	752	57

Figure 1.1 – Housing trajectory sites with Haringey schools



b) Demand analysis – Providers Audit

A telephone survey – using a standard format of semi-structured interview questions – was undertaken with (a) registered early years childcare providers/settings and (b) registered childminders and registered out of school childcare providers operating throughout the London Borough of Haringey locality.

79 of the borough's PVI early years childcare providers/settings participated in the survey – i.e. 100% of that cohort operating in the locality.

42 of the borough's 52 maintained school nursery classes participated in the survey – i.e. 80% of that cohort operating in the locality.

136 of the borough's relevant childminders participated in the survey – i.e. 81% of that cohort operating in the locality. It can be noted that 43% of the responding childminders stated that they co-worked with another registered childminder or a childminding assistant.

Additionally, during 2019 a telephone survey – using a standard format of semi-structured interview questions – was undertaken with (a) after school clubs; (b) before school/breakfast clubs and (c) holiday playschemes operating throughout the London Borough of Haringey locality.

- 40 after school clubs participated in the survey
- 35 breakfast clubs participated in the survey
- 9 holiday playschemes participated in the survey

The Providers Audit requested that respondents give feedback on **demand-themed subjects**, including demand orientated issues that were related to funded early years places and childcare places, i.e. the:

- Funded entitlement for 2 year olds
- 15 hours funded entitlement for 3 and 4 year olds
- 30 hours childcare offer

The following section outlines that demand-themed feedback, commencing with...

1.8 Incidence of waiting lists

- 1.8.1 All responding early years childcare providers/settings were asked whether they had a waiting list for their provision in 2019. 35% of responding PVI settings stated that they did have a waiting list for both fee paying and funded places, most frequently situated in the Alexandra, Fortis Green, Highgate and Muswell Hill wards and for the (non funded) 1 years age group. 36% of responding maintained nursery classes stated that they did have a waiting list, and were mainly situated in the above wards and for the 3 years age group. In contrast, 12% of registered childminders stated that they did have a waiting list, most frequently for the 0 – 12 months age group and such childminders were most frequently operating in the above wards.

- 1.8.2 Responding providers were asked to indicate the number of children that they had on a waiting list for each age range – see Table 17 and Table 18.

Table 17 - Numbers of children waiting for a childcare place by ward and NLC and provider type as stated by *responding* childcare providers

Network Learning Community	Registered Childminder	Early Years Childcare PVI setting	Maintained Nursery Class	Out of School Provider	Total
Muswell Hill/Highgate Network Learning Community					
Alexandra	1	96	48	0	145
Fortis Green	0	84	17	2	103
Highgate	0	0	21	5	26
Muswell Hill	8	47	0	14	69
Total NLC	9	227	86	21	343
Hornsey/Stroud Green Network Learning Community					
Crouch End	4	66	0	5	75
Hornsey	0	15	4	0	19
Stroud Green	0	50	10	0	60
Total NLC	4	131	14	5	154
Wood Green Network Learning Community					
Bounds Green	5	6	0	0	11
Noel Park	2	7	11	0	20
Woodside	8	16	10	0	34
Total NLC	15	29	21	0	65
Harringay/West Green Network Learning Community					
Harringay	5	39	0	40	84
St. Ann's	0	0	0	0	0
West Green	2	302	127	3	434
Total NLC	7	341	127	43	518
North East Tottenham Network Learning Community					
Northumberland Park	0	0	4	0	4
White Hart Lane	0	0	0	0	0
Total NLC	0	0	4	0	4
South East Tottenham Network Learning Community					
Bruce Grove	0	0	0	0	0
Seven Sisters	0	0	6	6	12
Tottenham Green	0	30	0	15	45
Tottenham Hale	0	24	0	0	24
Total NLC	0	54	6	21	81

The numbers of children waiting for a childcare place had evidently decreased in comparison to 2015. However, as in the 2015 Childcare Sufficiency Assessment, a relatively high number of children are evidently waiting for a place at settings located in the Harringay, St Ann's and West Green wards.

Table 18 - Numbers of children waiting for a childcare place by NLC and age range as stated by *responding* sector childcare providers

Network Learning Community	0 – 12 months Age Group	1 years Age Group	2 years Age Group	3 – 4 years Age Group	5 – 11 years Age Group
Muswell Hill/Highgate Network Learning Community					
Alexandra	7	0	73	17	0
Fortis Green	28	27	12	12	2
Highgate	0	0	0	0	5
Muswell Hill	11	7	37	6	14
Total NLC	46	34	122	35	21
Hornsey/Stroud Green Network Learning Community					
Crouch End	2	10	44	12	5
Hornsey	10	5	0	0	0
Stroud Green	25	25	0	0	0
Total NLC	37	40	44	12	5
Wood Green Network Learning Community					
Bounds Green	4	0	5	2	0
Noel Park	2	4	5	0	0
Woodside	0	4	10	4	0
Total NLC	6	8	20	6	0
Harringay/West Green Network Learning Community					
Harringay	5	10	19	10	40
St. Ann's	0	0	0	0	0
West Green	3	74	77	95	3
Total NLC	8	84	96	105	43
North East Tottenham Network Learning Community					
Northumberland Park	0	0	0	4	0
White Hart Lane	0	0	0	0	0
Total NLC	0	0	0	0	0
South East Tottenham Network Learning Community					
Bruce Grove	0	0	0	0	0
Seven Sisters	0	1	0	0	6
Tottenham Green	0	20	10	0	15
Tottenham Hale	0	0	23	0	0
Total NLC	0	21	33	0	21

Table 18 indicates that children who are in the age ranges 2 – 4 years make up the majority of those waiting for a place (926 children on waiting lists aged 2 – 4 years out of 1,124 across all age ranges, or 82%).

1.9 Incidence of vacancies

- 1.9.1 Table 19 indicates the number of vacant places reported by the *responding* childcare providers in 2019.

Table 19 - Numbers of vacant places by NLC and age range

Network Learning Community	0 – 12 months Age Group	1 years Age Group	2 years Age Group	3 – 4 years Age Group	5 – 11 years Age Group	Total
Highgate/Muswell Hill	12	38	79	103	338	570
Hornsey/Stroud Green	12	11	27	122	126	298
Wood Green	71	79	58	159	219	586
Harringay/West Green	58	71	174	305	365	973
North East Tottenham	38	28	70	138	460	734
South East Tottenham	55	63	214	239	597	1,168
Total	246	290	622	1,066	2,105	4,329

Table 20 outlines how a high percentage of vacancies are within the out of school childcare sector provider type (48% across all age ranges).

Table 20 - Numbers of vacant places by NLC and provider type

Type of Childcare Provider	0 – 12 months Age Group	1 years Age Group	2 years Age Group	3 – 4 years Age Group	5 – 11 years Age Group	Total
Childminder	74	89	115	92	n/a	370
Early Years PVI Setting	172	201	475	741	n/a	1,589
Maintained Nursery Class	0	0	42	251	n/a	293
Out of School Provider	n/a	n/a	n/a	226	1,851	2,077

- 1.9.2 Table 21 indicates the vacancies reported by ward and age range by *responding* (a) early years childcare providers/settings – i.e. PVI settings and maintained nursery classes – and (b) registered childminders.

Table 21 - (Combined) vacancies by ward and age range stated by (a) early years childcare providers/settings – i.e. PVI settings and maintained nursery classes – and (b) registered childminders

Ward and Network Learning Community	0 – 12 months Age Group	1 years Age Group	2 years Age Group	3 – 4 years Age Group	Total
Network Learning Community: Highgate/Muswell Hill					
Alexandra	0	0	5	3	8
Fortis Green	8	34	34	46	122
Highgate	0	0	12	18	30
Muswell Hill	3	4	28	36	71
Total NLC	11	38	79	103	231
Network Learning Community: Hornsey/Stroud Green					
Crouch End	0	6	20	40	66
Hornsey	12	0	12	63	87
Stroud Green	0	5	5	0	10
Total NLC	12	11	37	103	163
Network Learning Community: Wood Green					
Bounds Green	15	2	33	37	87
Noel Park	31	18	18	28	95
Woodside	25	32	7	91	155
Total NLC Total NLC	71	52	58	156	337
Network Learning Community: Harringay/West Green					
Harringay	78	30	85	90	283
St. Ann's	5	20	102	107	234
West Green	18	23	50	80	171
Total NLC	101	73	237	277	688
Network Learning Community: North East Tottenham					
Northumberland Park	1	6	32	30	69
White Hart Lane	37	22	34	108	201
Total NLC	38	28	66	148	280
Network Learning Community: South East Tottenham					
Bruce Grove	50	37	21	73	181
Seven Sisters	0	1	11	45	57
Tottenham Green	0	5	15	20	40
Tottenham Hale	5	5	133	146	289
Total NLC	55	48	180	284	567
Total Haringey	288	250	657	1,071	2,266

1.10 Fees and the Cost of Childcare

- 1.10.1 The size of childcare fees was cited by parents as a barrier to the use of formal childcare, i.e. a contingency which can affect demand (see page 75). Based on the 2019 Providers Audit responses the cost of childcare in the London Borough of Haringey is higher than the inner-London average, with an average cost per hour for a nursery provision of £7.81 and for a childminder: £7.30.

Table 22 – Average cost per hour by childcare type

Type of Childcare Provider	Per Hour Haringey	Per Hour London	Per Session	Per Day
Childminder	£7.30	£6.11	£32.36	£59.20
Early Years PVI Setting	£7.81	£6.47	£34.14	£63.98
Out of School Provider	£2.36	n/a ⁶	£3.13	n/a

Table 22 indicates that the most expensive type of childcare in the London Borough of Haringey in 2019 are PVI early years childcare providers/settings at, on average, almost £64.00 per day. Table 23 below shows the cost of childcare aligned to Network Learning Community as (per fees) reported by the early years childcare settings and registered childminders who responded to the 2019 Providers Audit.

Table 23 - The average cost of childcare aligned to Network Learning Community for (a) PVI early years childcare providers/settings and (b) registered childminders

Wards of...	Per Hour	Per Session	Per Day
Alexandra, Fortis Green, Highgate and Muswell Hill	£8.35	£38.87	£70.61
Hornsey, Crouch End, Fortis Green	£8.18	£32.50	£64.84
Woodside, Noel Park, Bounds Green	£7.45	£32.79	£65.89
Harringay, St. Ann's, West Green	£7.35	£31.40	£56.06
Northumberland Park, White Hart Lane	£6.63	£31.48	£52.67
Tottenham Hale, Tottenham Green, Sevens Sisters, Bruce Grove	£7.03	£28.21	£55.31
Average	£7.50	£32.54	£60.90

Table 23 indicates that in 2019 childcare fees were most expensive in the Network Learning Community area of Highgate/Muswell Hill and were least expensive in the two Tottenham localities.

⁶ In summer 2019 Coram Family and Childcare reported that £57.36 was the average weekly fee for a place in an after-school club or £65.70 for a childminder in London. The 2019 Haringey CSA reported a weekly average of £50 for an after-school club.

1.10.2 Table 24 outlines the average hourly fee sizes aligned to ward level, once again for (a) PVI settings and (b) registered childminders. It indicates that in 2019 the following three wards had the most expensive childcare:

- Fortis Green ward
- Muswell Hill ward
- Alexandra ward

Table 24 – Average hourly cost of childcare (fees) by ward for (a) PVI settings and (b) registered childminders

Ward and Network Learning Community	Per Hour
Highgate/Muswell Hill Network Learning Community	
Alexandra	£7.90
Fortis Green	£8.42
Highgate	n/a
Muswell Hill	£8.12
Hornsey/Stroud Green Network Learning Community	
Crouch End	£7.69
Hornsey	£7.52
Stroud Green	n/a
Wood Green Network Learning Community	
Bounds Green	£8.50
Noel Park	£7.20
Woodside	£6.54
Harringay/West Green Network Learning Community	
Harringay	£7.14
St. Ann's	£6.42
West Green	£5.74
North East Tottenham Network Learning Community	
Northumberland Park	£5.47
White Hart Lane	£7.50
South East Tottenham Network Learning Community	
Bruce Grove	£7.52
Seven Sisters	£7.40
Tottenham Green	£5.95
Tottenham Hale	£6.38 ⁷

⁷ Childminders only.

- 10.11.3 Finally, in terms of childcare costs, all *responding* (a) early years childcare providers/settings – i.e. PVI settings and maintained nursery classes – and (b) registered childminders were invited to state whether they applied any additional costs for 30 hours childcare offer places – for example, charges for food, outings and nursery resources.

Table 25 - Incidence of additional costs for 30 hours childcare offer places being charged aligned to type of early years childcare provider

Type of additional cost	PVI Setting	Maintained Nursery Class	Registered Childminder
Food and Meals	60%	96%	71%
Outings and Trips	5%	25%	19%
Resources	5%	0	13%

1.11 Early years free entitlement and eligibility for Funded Childcare

- 1.11.1 Children throughout the UK are entitled to free early education. It is funded by the government and administered by the local authority. These entitlements are for the equivalent of 38 weeks per year and some are means tested.

For example, all children aged 3 and 4 years are entitled to the universal 15 hours per week free entitlement until they start reception class in school.

Children aged 3 and 4 where both parents are working, or from lone parent families where that parent is working, are entitled to 30 hours per week – aka the 30 hours childcare offer – until the start reception class in school. Families are eligible where each parent is earning the equivalent of 16 hours per week at minimum or living wage and earns up to £100,000 per year. Families also qualifying where one parent is on maternity leave, incapacity benefit, severe disablement allowance, carers allowance or employment and support allowance and the other parent is working.

Finally, children aged 2 who's families receive certain benefits (including in work benefits with an income of less than £16,190, or who have a disability, or who are looked after by the local authority, are entitled to the (15 hours per week) free entitlement for 2 year olds. From April 2018 families who were in receipt of universal credit and a combined/sole income of £15,400 a year after tax also became entitled to the 15 hours per week. Nationally, about 40% of 2 year olds are entitled to this offer but the percentage varies by area.

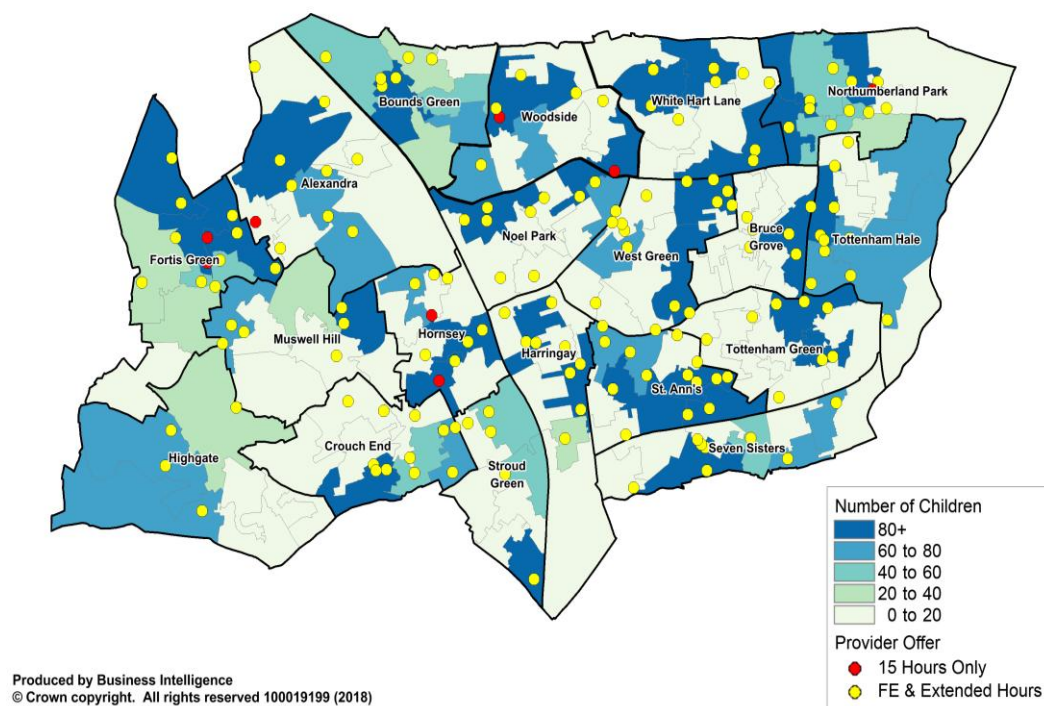
- 1.11.2 Although the following metrics could be deemed more relevant to the supply section of the 2019 Childcare Sufficiency Assessment, it is necessary to denote the following metrics, so as to provide context to the analysis that follows them.
- In April 2019, there were 81 Private, Voluntary and Independent (PVI) childcare providers in the London Borough of Haringey registered with Ofsted, of which 76 of these were delivering the 15 hours universal free entitlement for 3 and 4 year olds which equates to 94%. In addition there were 54 maintained nursery classes and 51 that deliver a free entitlement equating to 94%.

Positively, the borough has also seen a large increase in the numbers of registered childminders delivering the 15 hours universal free entitlement for 3 and 4 year olds – from 23 childminders in the January 2018 census to 65 in the January 2019 census, a 35% increase.

The introduction of the 30 hours childcare offer has had a significant impact upon the demand for all free entitlement/funded childcare places and has supported maintained schools to fill up their *afternoon* 15 hour funded childcare places, which prior to 2018, were not very popular with some families. The borough now has a majority of its schools (i.e. maintained nursery classes) delivering 30 hours – 43 in total. The borough also, in summer 2019, has c60 PVI settings and c25 registered childminders delivering the 30 hours childcare offer.

Diagram 3 - Location of the those London Borough of Haringey early years childcare settings that were providing funded childcare places in 2018

Providers of Free Entitlement & Extended Hours for 3-4 Year Olds - by Provider Postcode - as at 10th May 2018



1.11.3 Diagram 4 shows further context – i.e. the take up of funded childcare places by 3 year olds aligned to their ethnicity.

Diagram 4 shows further context – i.e. the take up of funded childcare places by 3 year olds aligned to their ethnicity

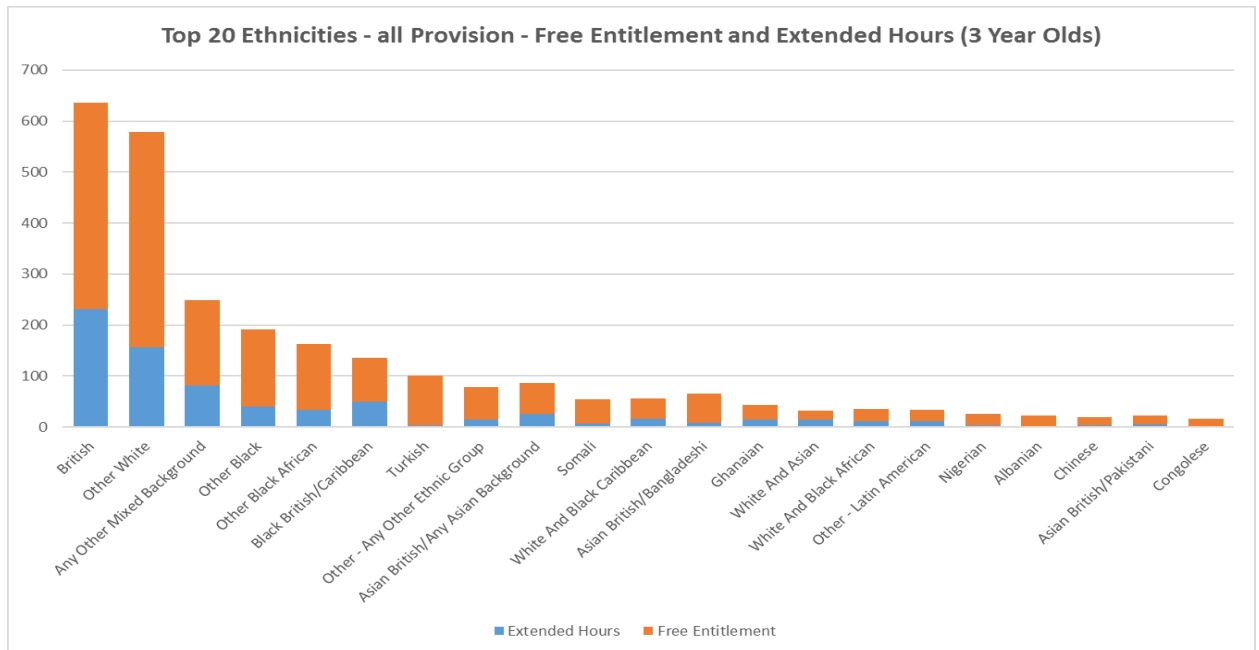


Diagram 4 indicates that White British and White Other 3 year olds have the highest take up figures – accounting for 23% and 21% respectively.

Diagram 5 shows further context – i.e. the take up of funded childcare places by 4 year olds aligned to their ethnicity.

Diagram 5 shows further context – i.e. the take up of funded childcare places by 4 year olds aligned to their ethnicity

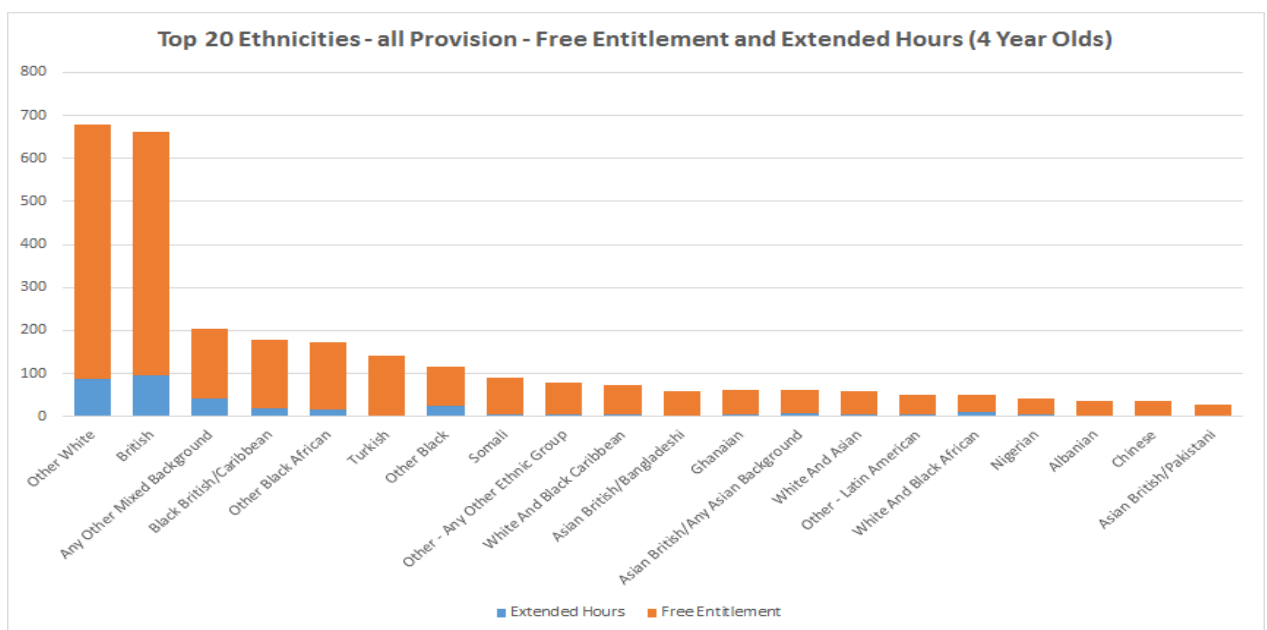


Diagram 5 indicates that the White British and white other have the highest take up figures for 4 year olds (22%).

- 1.11.4 The following section sets out a demand-themed analysis for (the three types of) funded childcare places, aligned to the responses to the 2019 Providers Audit. All *responding* and applicable (a) early years childcare providers/settings and (b) registered childminders were invited to state whether they believed that they were able to meet the demand for 30 hours childcare offer places, that they were receiving, in 2019 – see Diagrams 6 – 8.

Diagram 6 - Indication of where localised PVI settings believed that they could meet the demand that they were receiving for 30 hours childcare places, in 2019 in the 19 Haringey wards

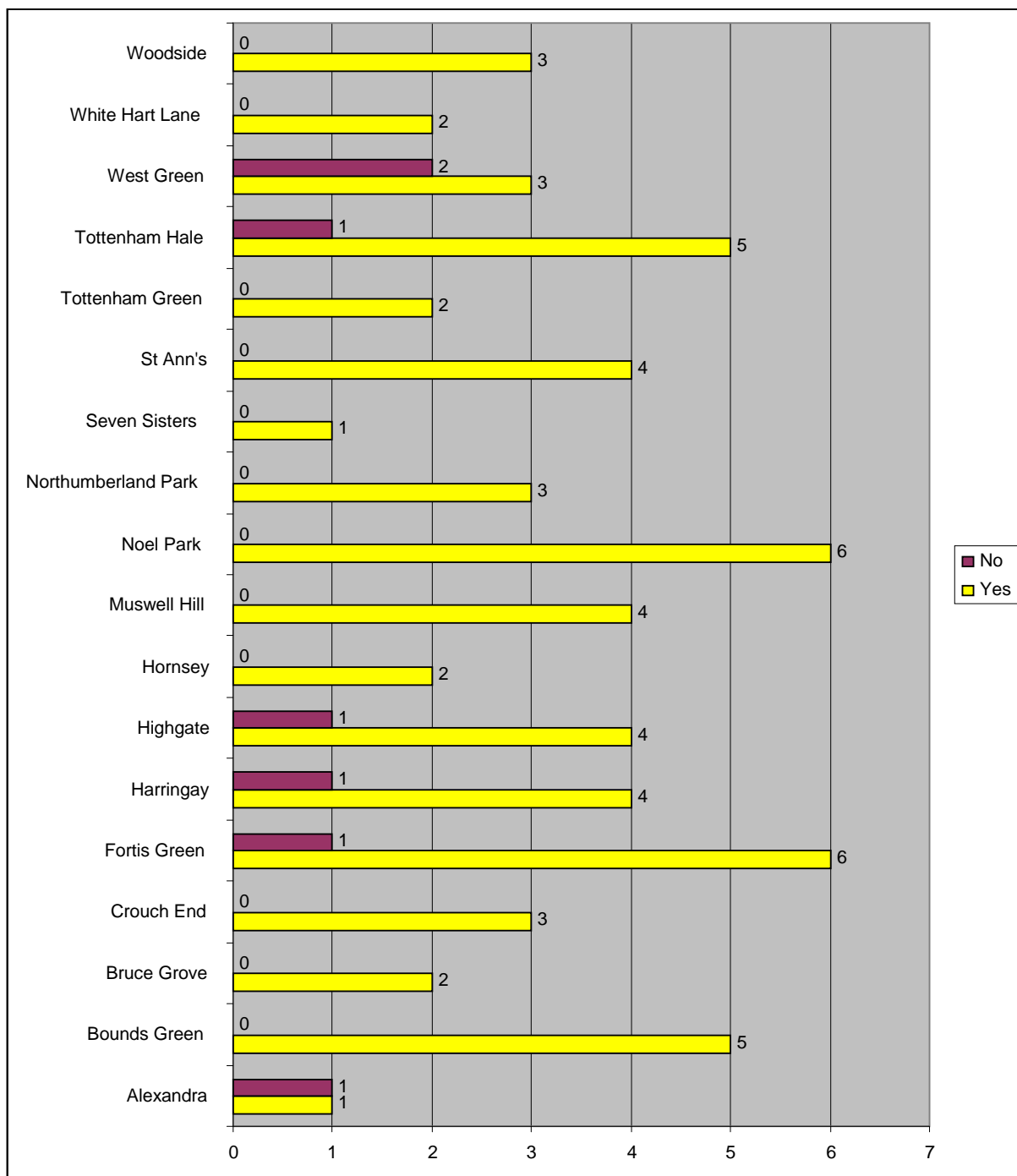


Diagram 7 - Indication of where localised maintained nursery classes believed that they could meet the demand that they were receiving for 30 hours childcare places, in 2019 in the 19 Haringey wards

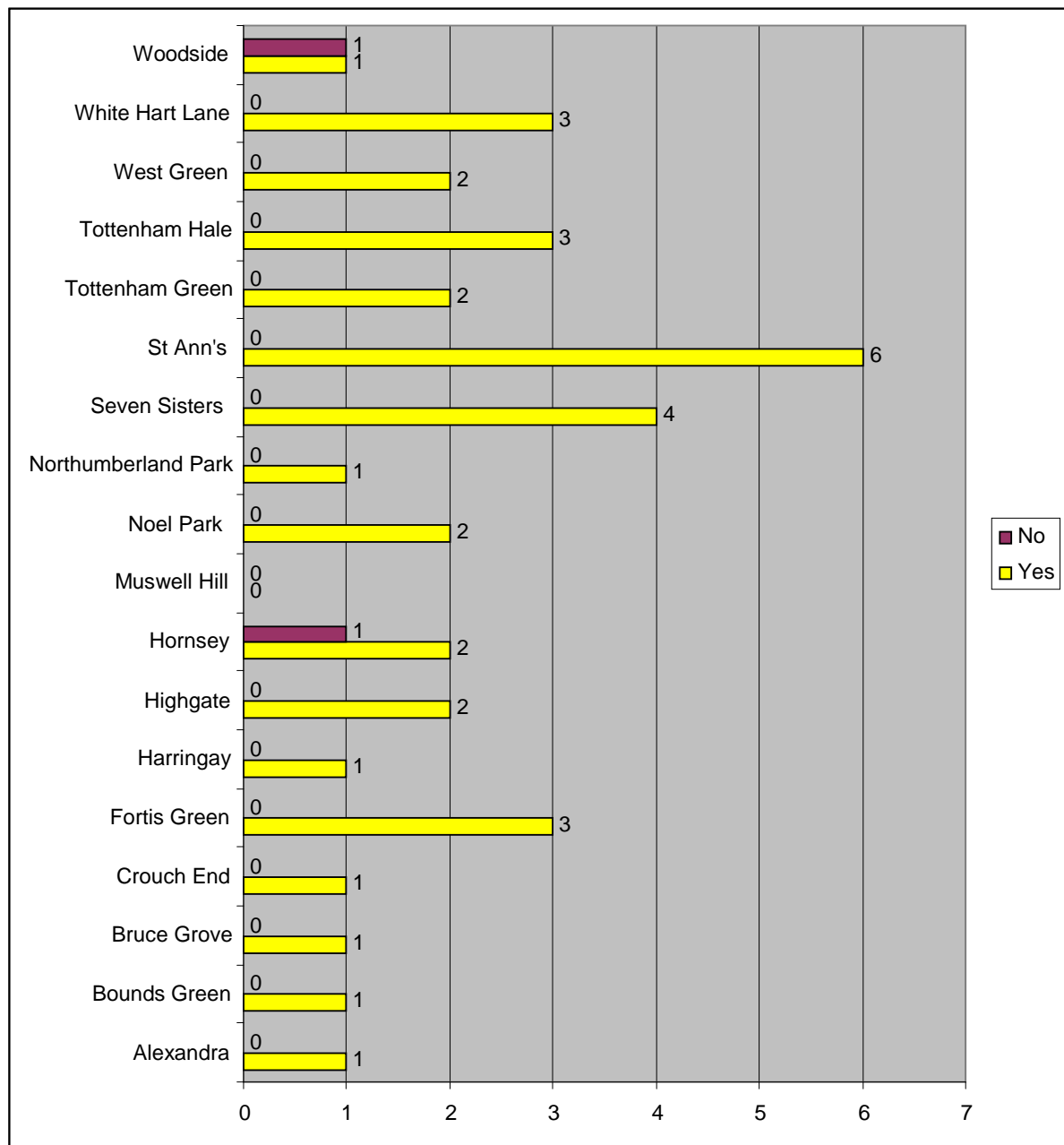
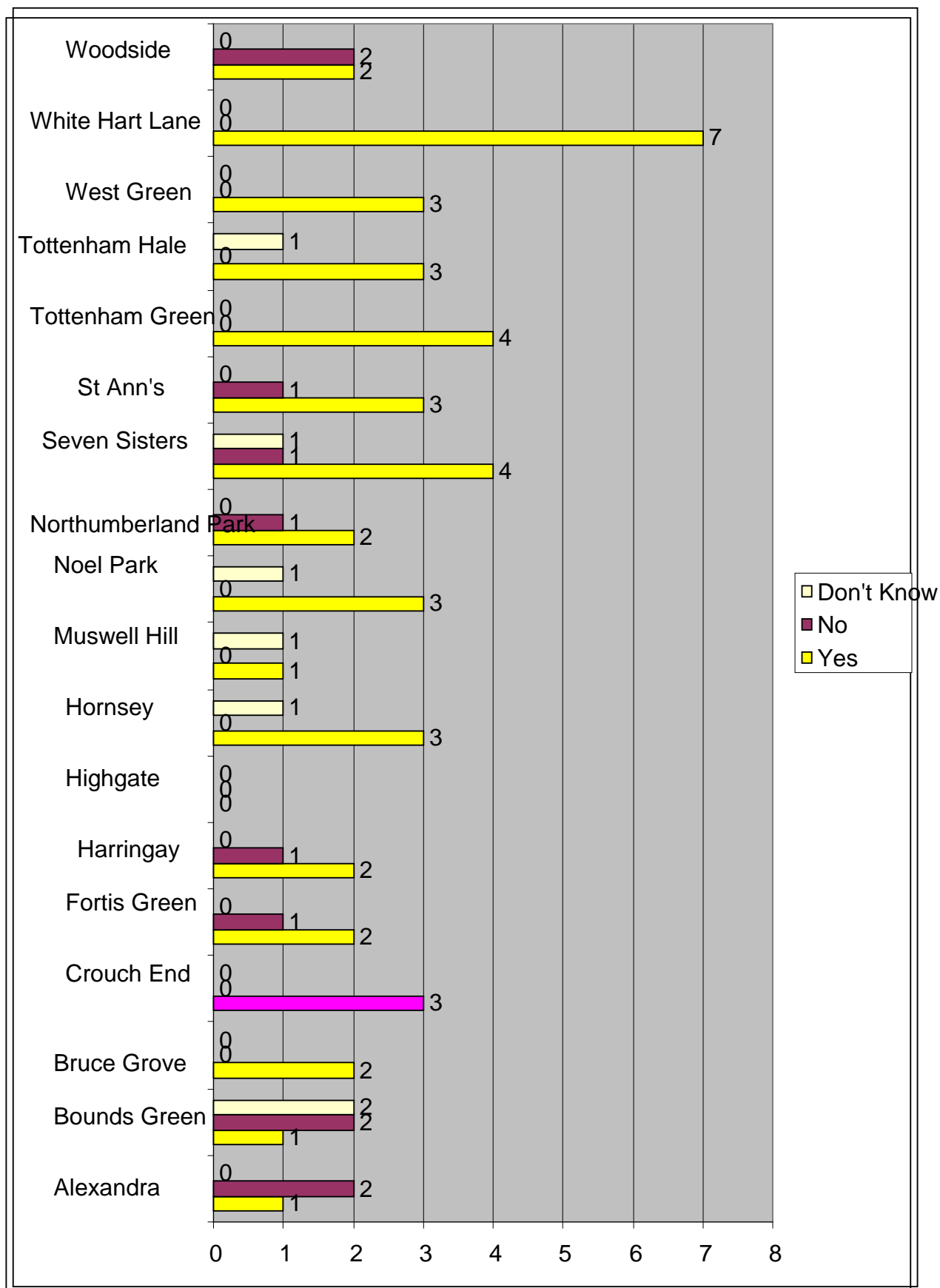


Diagram 8 - Indication of where localised childminders believed that they could meet the demand that they were receiving for 30 hours childcare places, in 2019 in the 19 Haringey wards



1.11.7 All *responding* and applicable (a) PVI settings and (b) registered childminders were invited to state whether they believed that they were able to meet the demand for funded entitlement for 2 year olds places, that they were receiving, in 2019 – see Diagrams 9 – 10.

Diagram 9 - Indication of where localised PVI settings believed that they could meet the demand that they were receiving for free entitlement for 2 year old places, in 2019 in the 19 Haringey wards

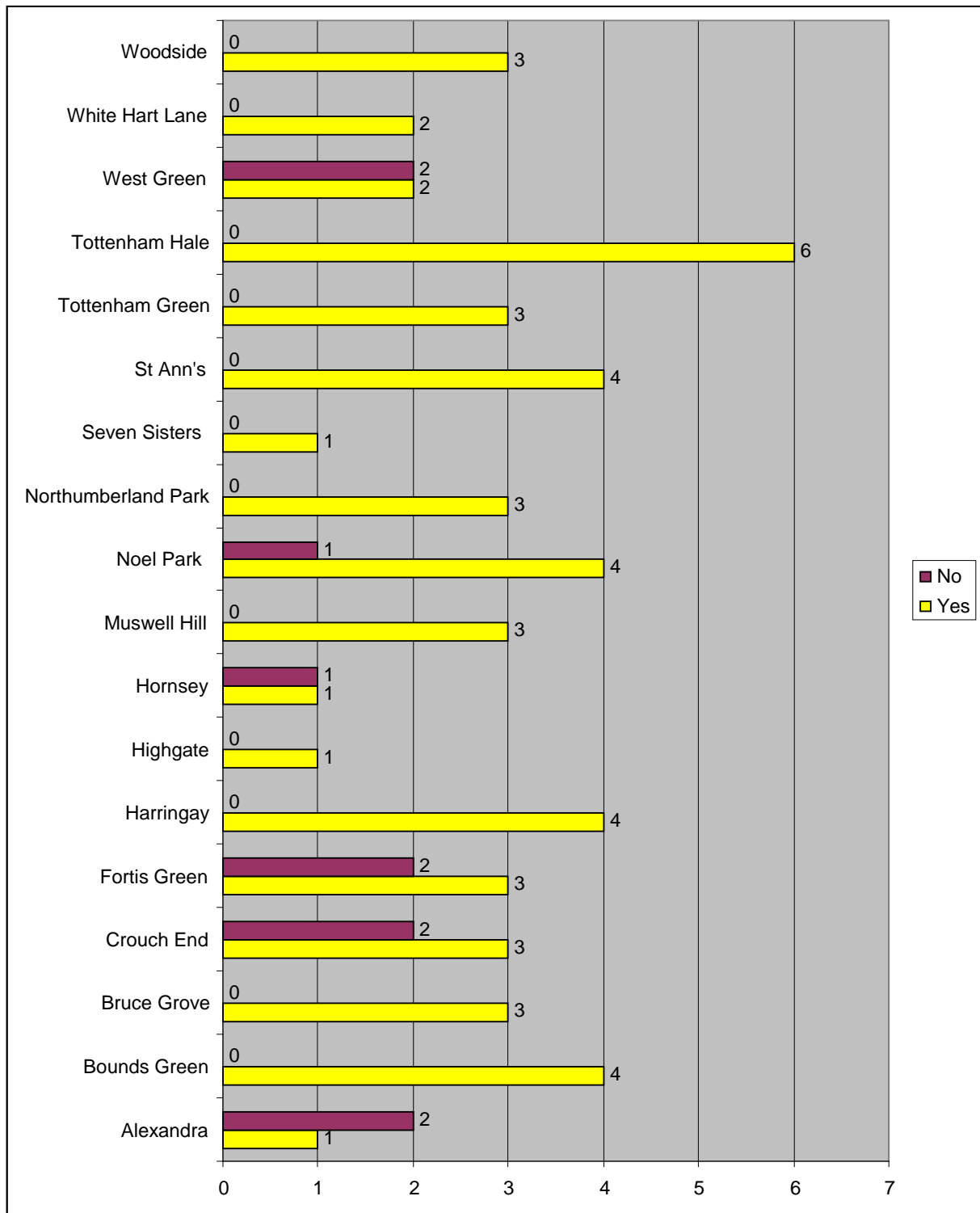
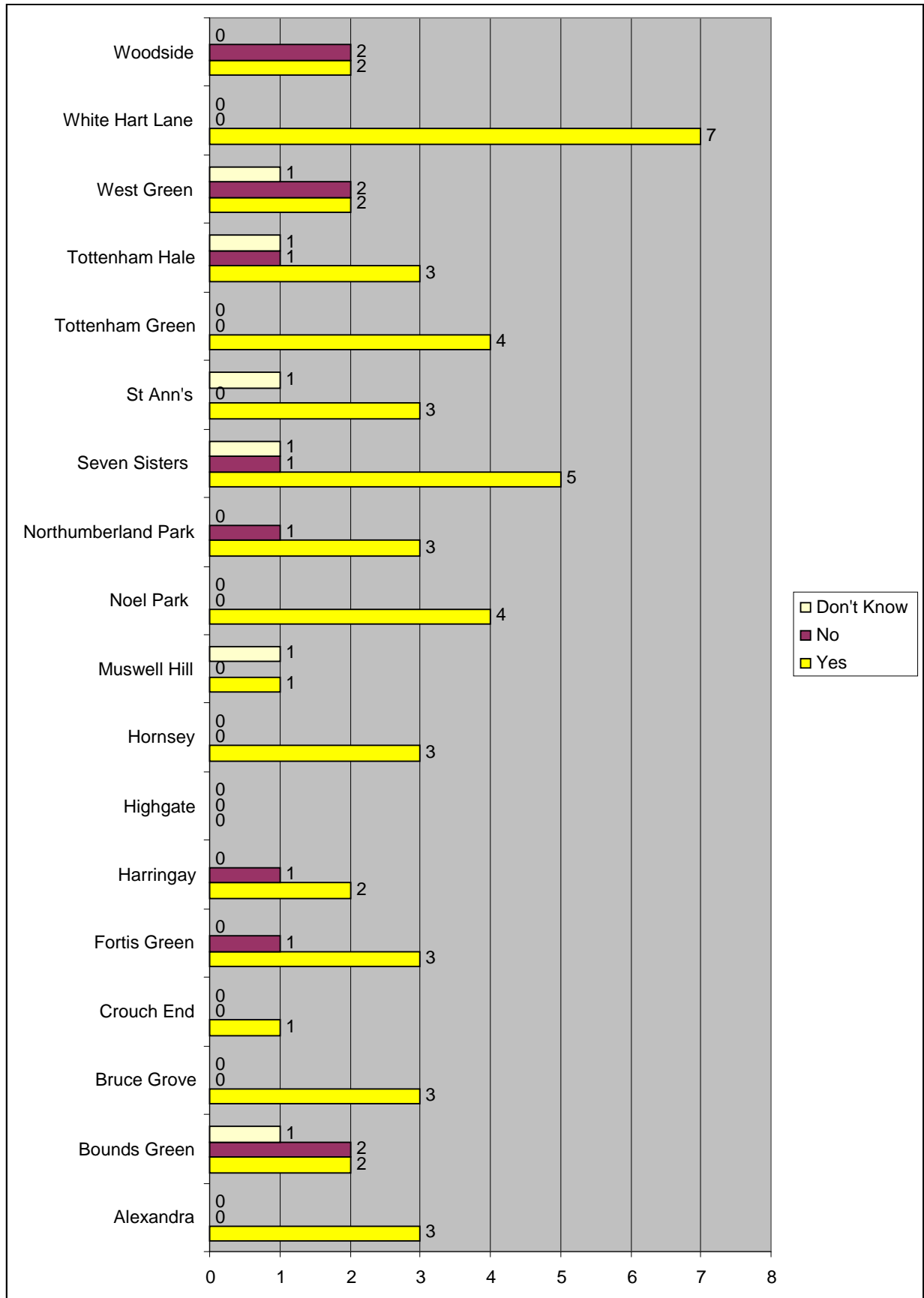


Diagram 10 - Indication of where localised childminders believed that they could meet the demand that they were receiving for free entitlement for 2 year old places, in 2019 in the 19 Haringey wards



1.11.8 Finally, all *responding* and applicable (a) early years childcare providers/settings – i.e. PVI settings and maintained nursery classes – and (b) registered childminders were invited to state whether they believed that they were able to meet the demand for universal 15 hours funded entitlement places for 3 and 4 year olds, that they were receiving, in 2019 – see Diagrams 11 – 13.

Diagram 11 - Indication of where localised PVI settings believed that they could meet the demand that they were receiving for universal 15 hours free entitlement for 3 and 4 year old places, in 2019 in the 19 Haringey wards

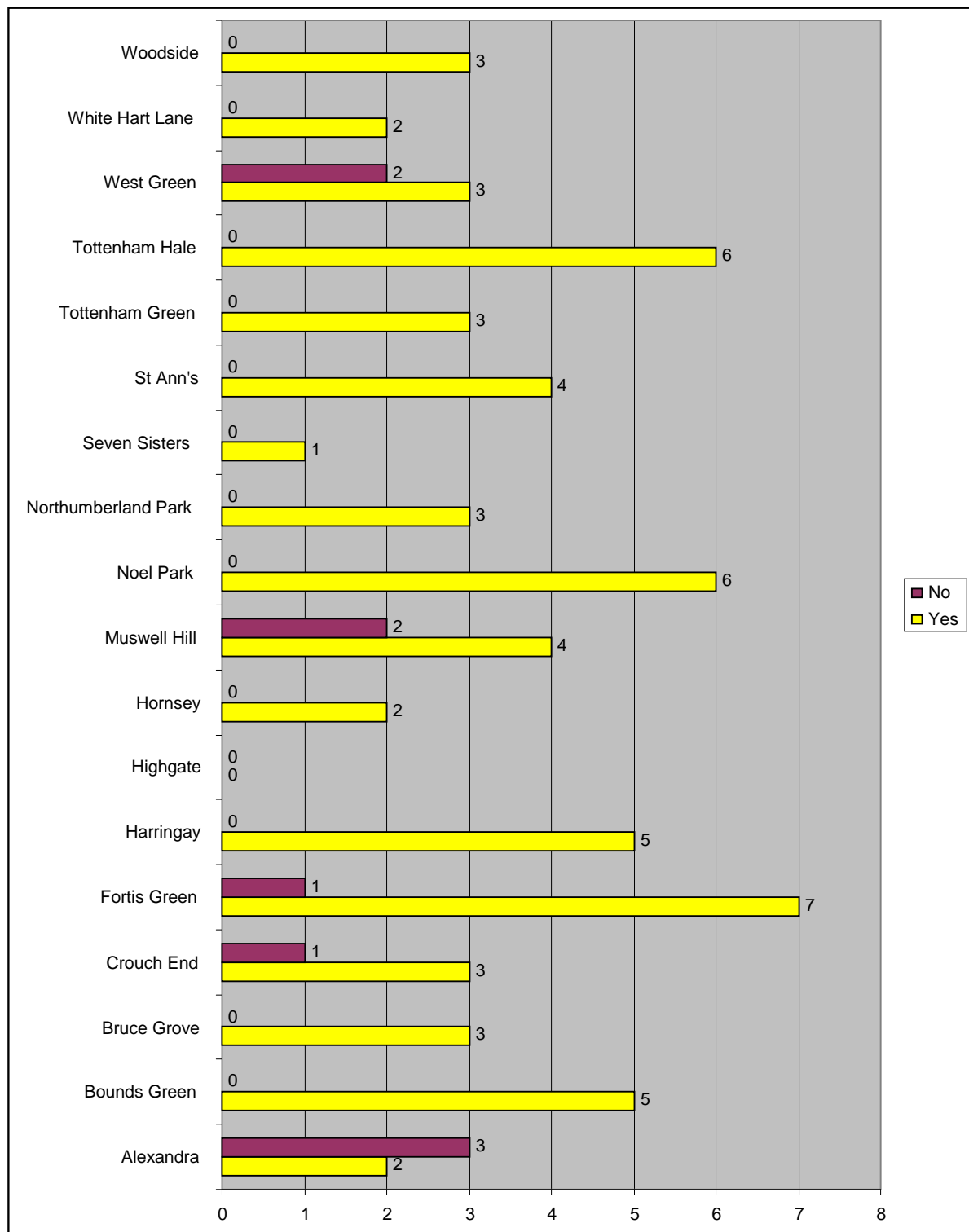


Diagram 12 - Indication of where localised maintained nursery classes believed that they could meet the demand that they were receiving for universal 15 hours free entitlement for 3 and 4 year old places, in 2019 in the 19 Haringey wards

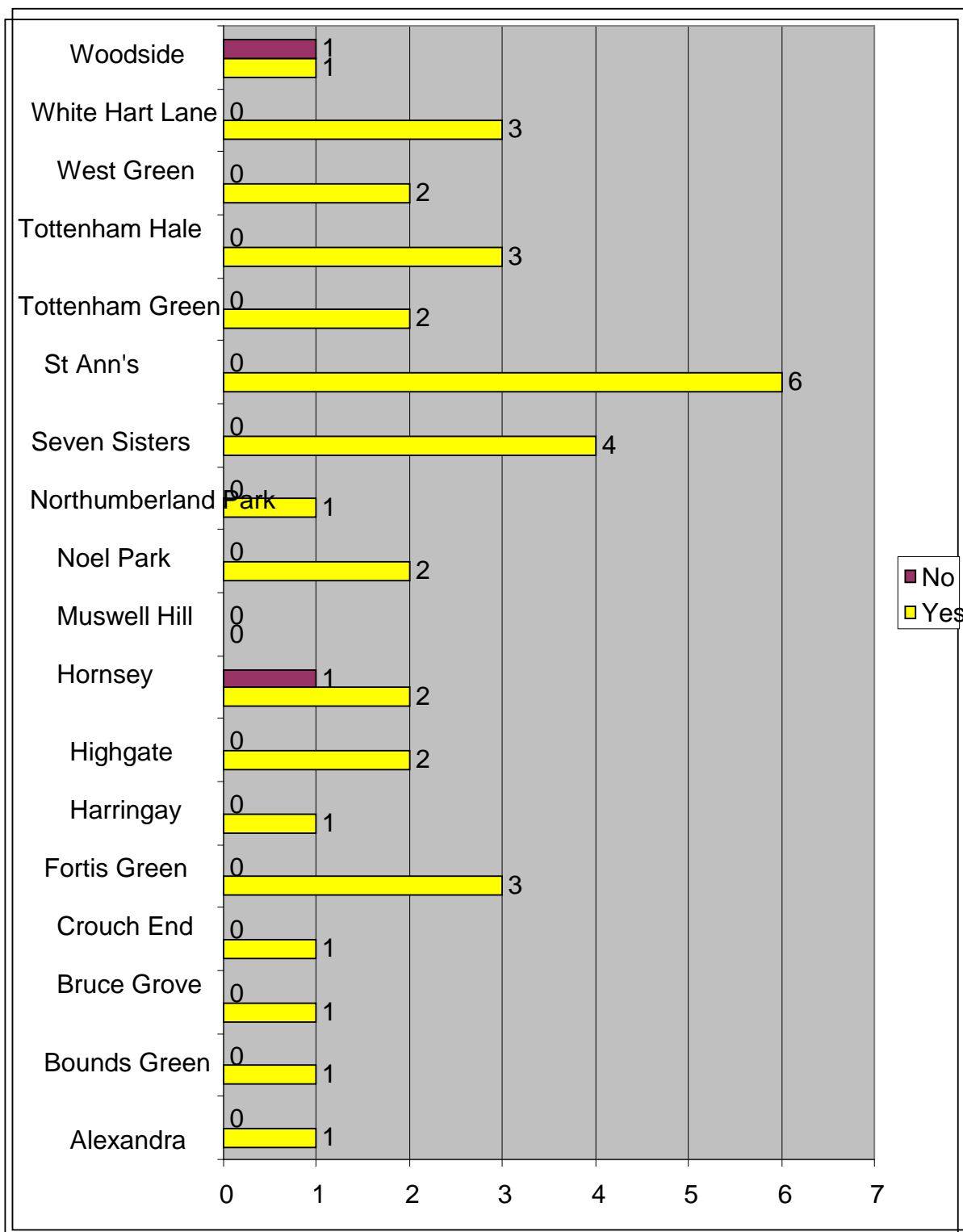
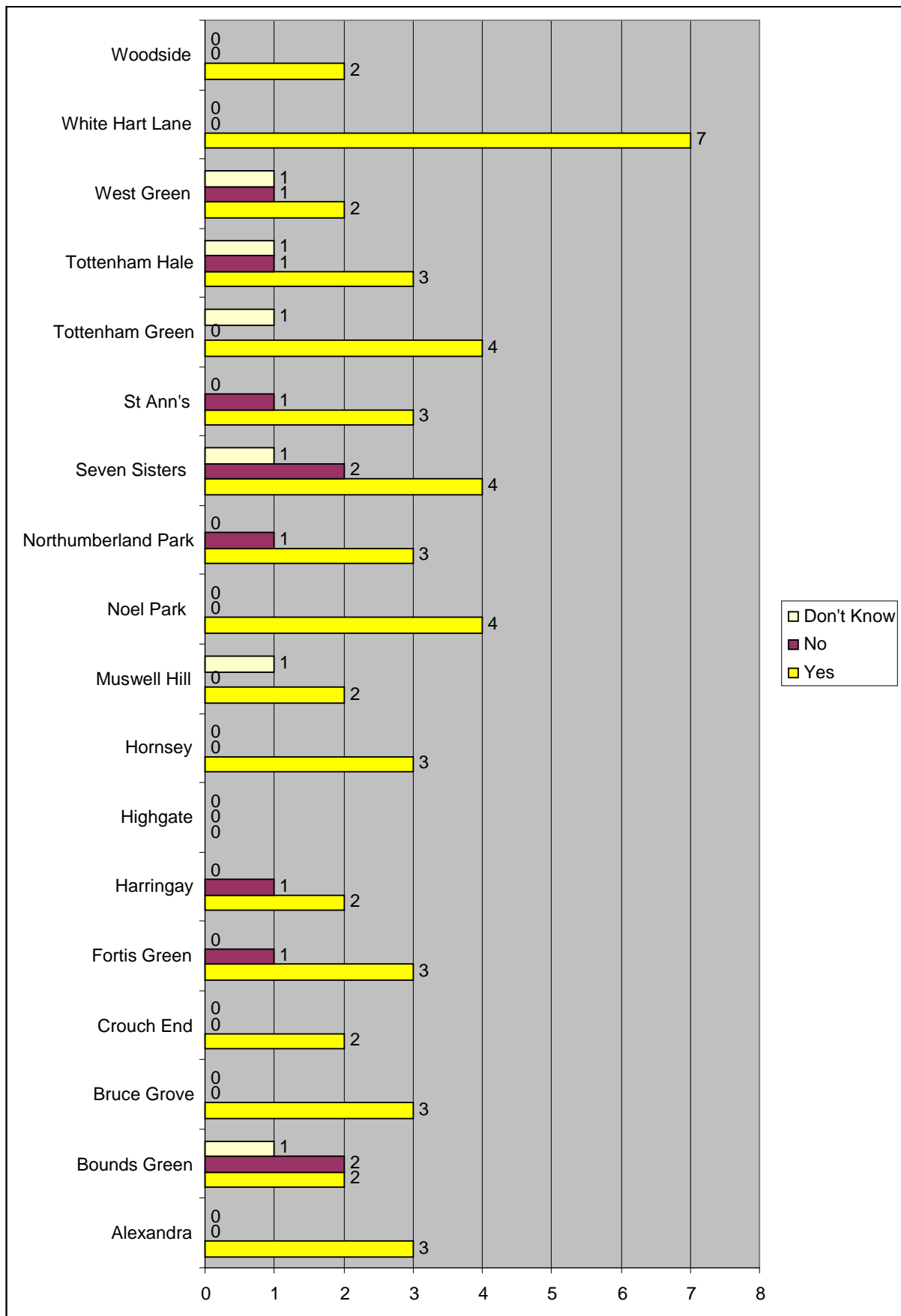


Diagram 13 - Indication of where localised childminders believed that they could meet the demand that they were receiving for universal 15 hours free entitlement for 3 and 4 year old places, in 2019 in the 19 Haringey wards



- 1.11.9 From a demand perspective, all *responding* and applicable (a) early years childcare providers/settings – i.e. PVI settings and maintained nursery classes *combined* – and (b) registered childminders were invited to state approximately how many 3 and 4 year olds currently pay for additional hours above their 30 hours childcare place, at *their* care in 2019.

The *responding/applicable* early years childcare providers/settings most frequently stated 2 of their 3 and 4 year olds. The average number per responding setting was 3.5. The three wards which accounted for the highest incidence of early years childcare providers/settings having 3 and 4 year olds currently paying for additional hours above their 30 hours childcare place(s) were (the neighbouring wards of):

1. (By a significant margin) Noel Park ward
2. St. Ann's ward
3. West Green ward

The *responding/applicable* registered childminders most frequently stated none of their 3 and 4 year olds. The average number was <1 of their 3 and 4 year olds.

- 1.11.12 Finally on the theme of the interaction of funded places, all responding and applicable (a) early years childcare providers/settings – i.e. PVI settings and maintained nursery classes – and (b) registered childminders who were providing the funded entitlement for 2 year olds were requested to state whether the advent of the 30 hours childcare offer had influenced or affected their delivery of the former offer. Only 5% of (the two types of) early years childcare providers/settings answered that it had, whilst only 3% of responding registered childminders answered that it had.

The most frequent statement was (words to the effect) “*There has been no effect on the other two entitlements*”.

The second most frequent statement – made by only 2 interviewees – was (words to the effect) “*we seem to have received fewer enquiries since the inception of the 30 hours childcare offer about the free entitlement for 2 year olds*”.

1.12 Demand and SEND children and young people

- 1.12.1 The Haringey Local Offer website: <https://www.haringey.gov.uk/children-and-families/local-offer> outlines how parents and carers can access early education and childcare in the borough.

The Providers Audit reported that in terms of *responding* (a) early years childcare providers/settings – i.e. PVI settings and maintained nursery classes – and (b) registered childminders, the five most frequent types of SEND being supported by early years childcare providers and attending their care in 2019 – aligned to age group were (in order of frequency):

1. (By a significant margin) 3 year olds with a Speech, Language and Communication Difficulty
2. 3 year olds with Autistic Spectrum Disorder
3. 2 year olds with a Speech, Language and Communication Difficulty
4. 4 year olds with a Speech, Language and Communication Difficulty
5. 4 year olds with Autistic Spectrum Disorder

- 1.12.2 All applicable and responding (a) early years childcare providers/settings – i.e. PVI settings and maintained nursery classes – and (b) registered childminders were invited to state how many funded entitlement places were occupied – in 2019 – by children with SEND.

There were 0 examples of responding childminders stating that they were caring for a 2 – 4 year old with SEND who were occupying a funded place.

In terms of funded entitlement for 2 year olds places at PVI settings and maintained nursery classes:

- 30% of relevant early years childcare providers stated: None
- 5% of relevant early years childcare providers stated: Don't Know
- 65% of relevant early years childcare providers stated a number... which was on average, 1 (SEND child)

In terms of universal 15 hours funded entitlement places for 3 and 4 year olds at early years childcare providers/settings:

- 31% of relevant early years childcare providers stated: None
- 2% of relevant early years childcare providers stated: Don't Know
- 67% of relevant early years childcare providers stated a number... which was on average, 2 (SEND children) – with the highest incidence being reported in the northern locality

In terms of the 30 hours childcare offer at early years childcare providers/settings:

- 52% of relevant early years childcare providers stated: None
- 2% of relevant early years childcare providers stated: Don't Know
- 46% of relevant early years childcare providers stated a number... which was on average, 1 (SEND child)

1.12.4 From a more general perspective than 1.12.3 above, *all* responding (a) early years childcare providers/settings – i.e. PVI settings and maintained nursery classes – and (b) registered childminders were asked how often they get approached by a parent/carer to see if their setting can care for a child who has SEND. In terms of the responding early years childcare providers/settings:

- 7% of providers stated: At least once a month
- 22% of providers stated: At least once a term
- 10% of providers stated: At least once every six months
- 11% of providers stated: At least once a year
- 31% of providers stated: Rarely
- 14% of providers stated: Never
- 6% of providers stated: Don't Know

In terms of the responding registered childminders:

- 1% stated: At least once a month
- 5% stated: At least once a term
- 7% stated: At least once every six months
- 8% stated: At least once a year
- 40% stated: Rarely
- 39% stated: Never

Relevant respondents (above) were subsequently requested to state how often, in the past 12 months they/their setting had unfortunately had to decline to take a child with SEND due to an inability to most effectively care for their needs. In terms of the responding early years childcare providers/settings:

- 1% of providers stated: Three times or more
(stated by a provider operating in the Bruce Grove ward)
- 0 providers stated: Twice
- 4% of providers stated: Once
- 95% of providers stated: 0 times

In terms of the responding registered childminders:

- 0 stated: Three times or more
- 1% stated: Twice
(stated by a childminder operating in the Woodside ward)
- 4% stated: Once
- 95% stated: 0 times

1.13 Incidence of observed trends in childcare during the period 2016 – 2019

- 1.13.1 All responding early years childcare providers/settings and registered childminders were requested to outline whether, during the period 2016 – 2019, they had witnessed any *notable* (and new) trend(s) – including in terms of the circumstances of and backgrounds of families accessing their provision.

46% of PVI settings responded that since 2016, they *had* witnessed a *notable* trend(s). The three most frequent types of trends stated by early years childcare providers/settings were (in order of frequency):

1. Receipt of more “*enquiries*” for places for babies
2. An increased incidence of parents saying that they are unable to afford fees
3. An evolving demand for the 30 hours childcare offer

57% of maintained nursery classes responded that since 2016, they *had* witnessed a *notable* trend(s). The three most frequent types of trends stated by early years childcare providers/settings were (in order of frequency):

1. An increased demand for longer/extended hours of care
2. An increased demand for full-time hours of care
3. An evolving demand for the 30 hours childcare offer

- 1.13.2 45% of registered childminders responded that since 2016, they had witnessed a *notable* trend(s).

The three most frequent types of trends stated by registered childminders were:

1. An *decreased* demand – in general – including for funded entitlement places
2. We are aware of more parents preferring to access setting-based early years childcare
3. An increased demand for longer/extended hours of care

- 1.13.3 All responding out of school childcare providers were requested to outline whether, since 2016 – 2019, they had witnessed any *notable* (and new) trend(s) – including in terms of the circumstances of and backgrounds of families accessing their provision.

55% of after school clubs responded that since 2016, they *had* witnessed a *notable* trend(s). The three most frequent types of trends stated by such providers/settings were (in order of frequency):

1. Generally demand has increased
2. A higher incidence of *working* parents are enquiring about a place
3. Parents with zero hours contracts require more flexibility

34% of breakfast clubs responded that since 2016, they *had* witnessed a *notable* trend(s). The three most frequent types of trends stated by such providers/settings were (in order of frequency):

1. Generally demand has increased
2. A higher incidence of parents requesting a pre-8am opening time
3. More requests to take 3 year old children

33% of holiday playschemes responded that since 2016, they *had* witnessed a *notable* trend(s). The two most frequent types of trends stated by such providers/settings were (in order of frequency):

1. A higher incidence of parents who struggle to afford fees
2. A discernible increase in demand from carers of children with SEND

1.14 Perceptions on how demand may modify by 2021

- 1.14.1 All early years childcare providers/settings – i.e. PVI settings and maintained nursery classes – and registered childminders were requested to state/qualify how much higher or lower they expected the demand for their provision/daycare places to be in early 2021 – i.e. two years hence.

Diagrams 14 and 15 outlines the responses/sector.

Diagram 14 - Extent to which early years PVI and maintained settings believed demand for (their) childcare would differ (or remain the same) in *early 2021*

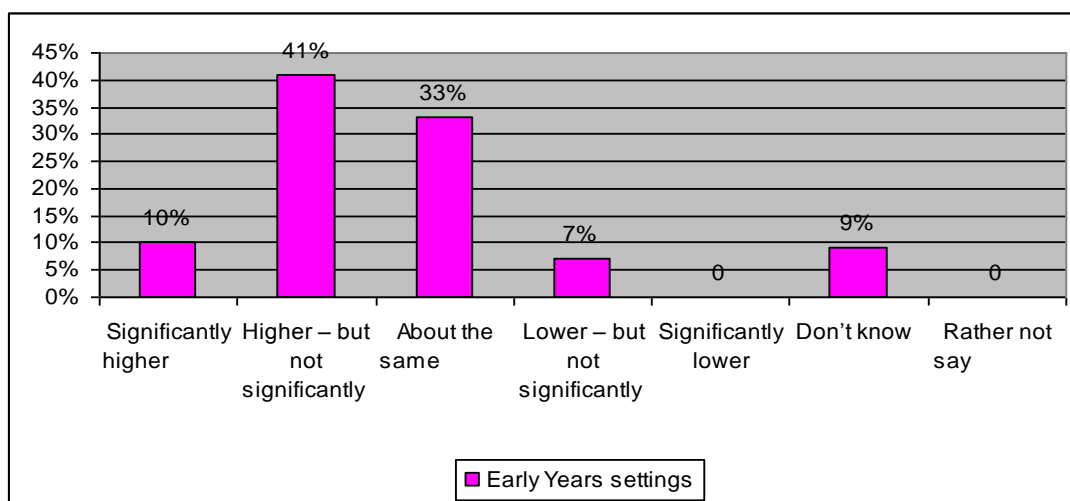
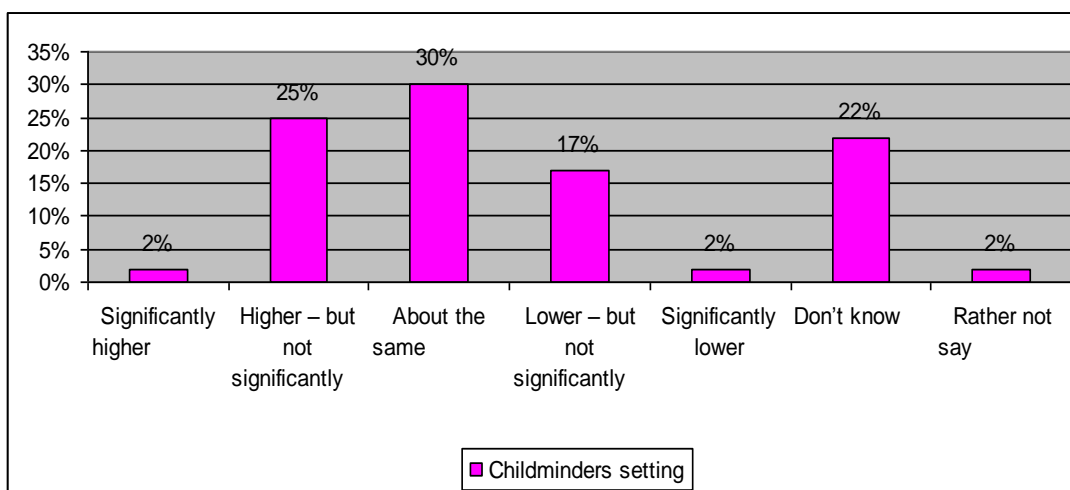


Diagram 15 - Extent to which registered childminders believed demand for (their) childcare would differ (or remain the same) in *early 2021*



1.14.2 Diagrams 14 and 15 indicate that the:

- London Borough of Haringey early years childcare providers/settings most frequently expected demand to be higher – but not significantly. One-third of the early years childcare providers/settings that stated Significantly Higher were located in the Tottenham Hale ward
- London Borough of Haringey registered childminders most frequently expected demand to be about the same

1.14.3 All out of school childcare providers were requested to state/qualify how much higher or lower they expected the demand for their provision/daycare places to be in early 2021 – i.e. two years hence. Diagrams 16, 17 and 18 outline the responses/sector...

Diagram 16 - Extent to which after school clubs believed demand for (their) childcare would differ (or remain the same) in *early 2021*

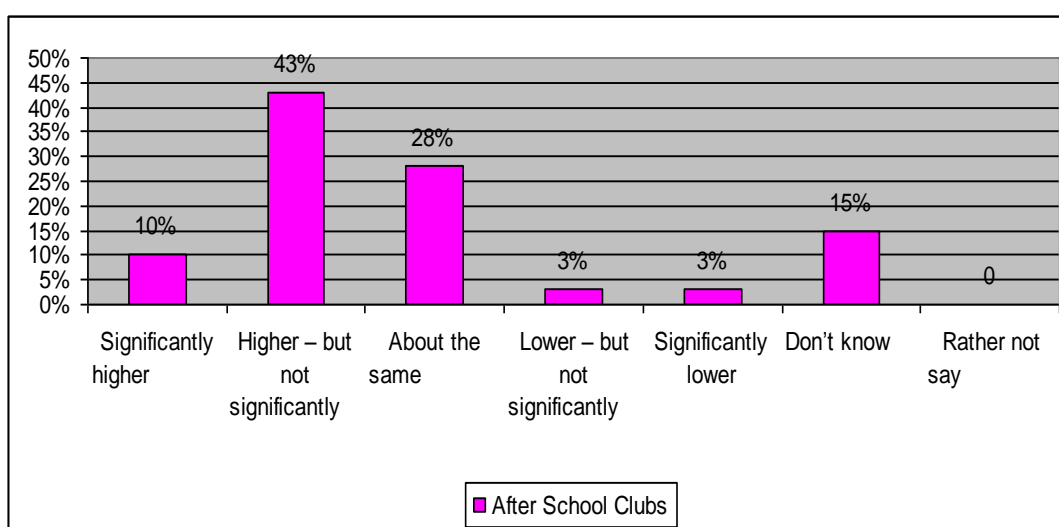


Diagram 17 - Extent to which breakfast clubs believed demand for (their) childcare would differ (or remain the same) in *early 2021*

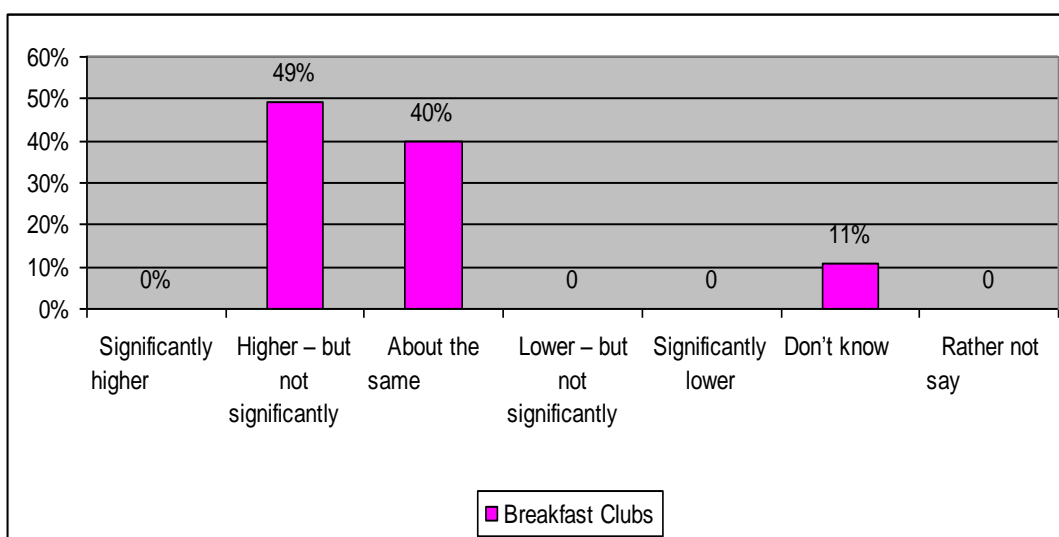
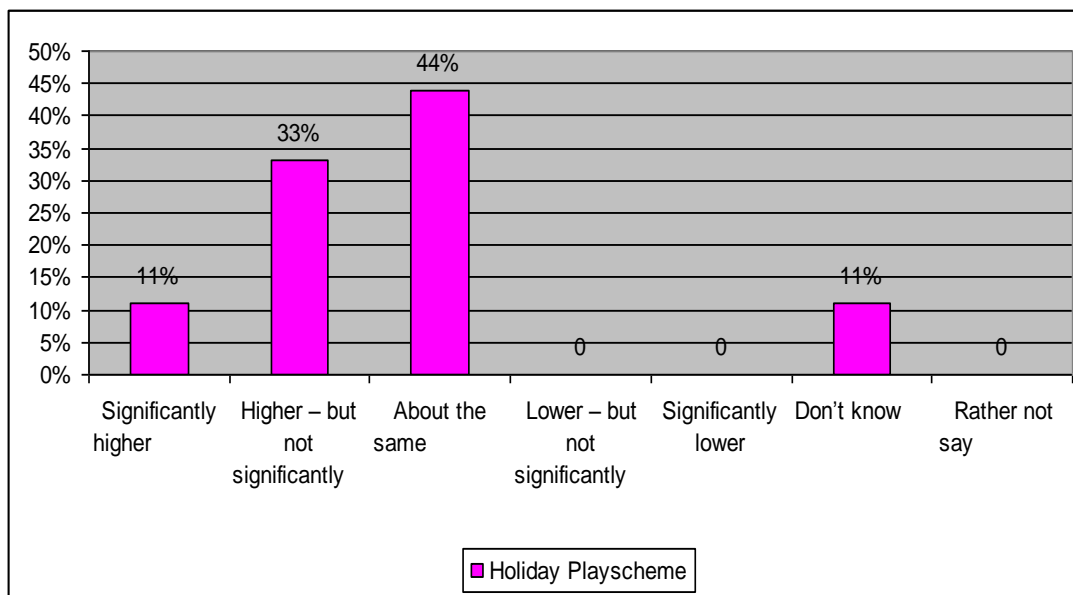


Diagram 18 - Extent to which holiday playschemes believed demand for (their) childcare would differ (or remain the same) in *early 2021*



- 1.14.4 Diagrams 16, 17 and 18 indicate that the London Borough of Haringey out of school childcare providers/settings most frequently expected demand to be higher – but not significantly. The Bruce Grove, Seven Sisters, Tottenham Green and Tottenham Hale accounted for the highest frequency of the response(s): Significantly Higher or Higher – but Not Significantly.

1.15 Perceptions on the existing sufficiency of childcare

- 1.15.1 Table 26 indicates the extent to which early years childcare providers/settings – i.e. PVI settings and maintained nursery classes – and registered childminders currently consider that – from their perspective – there is sufficiency of specific types of childcare places (denoted in column A) within *their immediate geographical area*. This section 1.15 should be viewed in the context of (a) the incidence of vacancies set out in section 1.19 and the availability of early years childcare and places with registered childminders that is presented in the Supply Section of this CSA – see page 87.

Table 26 - Extent to which early years childcare providers/settings and registered childminders operating in the London Borough of Haringey consider there is sufficiency of childcare places for 0 – 4 year olds

Age Groups of childcare places	Yes there is sufficiency of places for 0 – 12 months in our immediate geographical area	No there is not sufficiency of places for 0 – 12 months in our immediate geographical area	Don't know whether there is sufficiency of places for 0 – 12 in our immediate geographical area	Yes there is sufficiency of places for 1 year olds in our immediate geographical area	Yes there is sufficiency of places for 1 year olds in our immediate geographical area	Yes there is sufficiency of places for 1 year olds in our immediate geographical area	Yes there is sufficiency of places for 2 year olds in our immediate geographical area	Yes there is sufficiency of places for 2 year olds in our immediate geographical area	Yes there is sufficiency of places for 2 year olds in our immediate geographical area	Yes there is sufficiency of places for 3 olds in our immediate geographical area	Yes there is sufficiency of places for 3 olds in our immediate geographical area	Yes there is sufficiency of places for 3 olds in our immediate geographical area	Yes there is sufficiency of places for 4 year olds in our immediate geographical area	Yes there is sufficiency of places for 4 year olds in our immediate geographical area	Yes there is sufficiency of places for 4 year olds in our immediate geographical area
Early Years Settings	59%	22%	19%	62%	20%	18%	75%	10%	15%	80%	8%	12%	79%	10%	11%
Registered Childminders	70%	20%	10%	71%	19%	10%	75%	14%	11%	80%	10%	10%	79%	10%	11%

- 1.15.2 Table 26 indicates that approximately 1 : 5 of all early years childcare providers/settings *did not* feel that there were sufficient childcare places *in their immediate geographical area* for children aged under 2 years – a response which was most frequently given by such providers that were situated within the Alexandra, Muswell Hill, Fortis Green and Highgate wards of the borough.
- 1.15.3 Table 27 indicates the extent to which term time out of school childcare providers consider that – from their perspective – there is sufficiency of specific types of childcare places within *their immediate geographical area*.

Table 27 - Extent to which term time out of school childcare providers/settings operating in the London Borough of Haringey currently consider there is sufficiency of childcare places for 5 – 14 years

Age Groups of childcare places	Yes there is sufficiency of places for 5 – 11 years	Yes there is sufficiency of places for 5 – 11 years	Yes there is sufficiency of places for 5 – 11 years	Yes there is sufficiency of places for 12 – 14	Yes there is sufficiency of places for 12 – 14	Yes there is sufficiency of places for 12 – 14
Early Years Settings	60%	25%	15%	20%	28%	52%
Registered Childminders	54%	31%	15%	20%	26%	51%

- 1.15.4 Table 27 indicates that approximately 1 : 4 of term time out of school childcare providers *did not* feel that there were sufficient childcare places *in their immediate geographical area* for children aged *under* 5 – 11 years – a response which was most frequently given by such providers that were situated within the Wood Green Network Learning Community.

c) Findings from Parents and Carers Survey

In 2019, parents and carers responded to three approaches:

1. A series of structured telephone interviews
2. A series of fieldwork interviews – so as to ensure representation from parents and carers from all sections of the borough's diverse communities
3. An on-line survey, which enabled parents and carers to also feedback at their convenience

The on-line survey was posted on the London Borough of Haringey's web-site and was promoted through their social media channels – including via the Council's twitter feed. The following section outlines that *demand-themed* feedback, commencing with...

1.16 Parental Usage of Childcare

- 1.16.1 All parents were asked the key question, ***which of the following situations applies to yourself and your (sample of 744) children?***

Scenario 1= **Use Formal *registered* childcare only**

Scenario 2 = **Use Formal *registered* and Informal *unregistered* childcare**

Scenario 3 = **Do not use any Formal registered childcare, but may use Informal *unregistered* childcare**

Table 28 below outlines the relevant percentages of parents who stated a particular scenario aligned to them having at least one child aged 0 – 4 years and/or one child aged 5 – 19 years.

Table 28 - Percentages of parents who stated a particular scenario aligned to them having at least one child aged 0 – 4 years and/or one child aged 5 – 19 years

Scenario	Number: Those with at least one 0 – 4 year old	Percentage: Those with at least one 0 – 4 year old	Number: Those with at least one 5 – 19 year old	Percentage: Those with at least one 5 – 19 year old
Scenario 1= Use Formal <i>registered</i> childcare only	273	52%	86	38%
Scenario 2 = Use Formal <i>registered</i> and Informal <i>unregistered</i> childcare	43	8%	17	7.5%
Scenario 3 = Do not use any Formal registered childcare, but may use Informal <i>unregistered</i> childcare	203	39%	122	54%

From the above percentages it can be *reasonably assumed* that approximately (just under) 50% of parents with 0 – 19 year olds resident in the London Borough of Haringey are not – in early 2019 – accessing any formal childcare support and that just

over 50% are accessing at least one type of formal childcare. Parents who were in some form of (full-time or part-time) employment most frequently stated their circumstance(s) as Scenario 1, i.e. Formal *registered* childcare only.

- 1.16.2 In terms of the backgrounds of *all* of the responding parents/carers – firstly they were asked to state a description which they believed *best described* their present circumstances/occupation.

Table 29 - Employment and day-to-day circumstances of parents

Circumstances of respondent	Percentage of respondents
In full-time employment/self-employment (30 hours+/week)	26%
In part-time employment/self-employment (<30 hours/week)	27%
Not currently in work (at home raising children)	25%
Retired	0
Studying full-time	2%
Volunteering	0
Other	9%
I'd rather not say	9%

Table 29 shows that the most frequent classification made by a parent/respondent was them being in part-time employment/self-employment (30 hours+/week), followed (closely) in frequency by being in full-time employment/self-employment (30 hours+/week). The classification full-time was most frequently stated by responding parents who were resident in the Harringay and West Green Network Learning Community.

Therefore, approximately 1 : 2 of the responding parents stated that they were *currently* in a type of paid employment – i.e. they were working parents.

Those who stated 'Other' most frequent further specified: maternity leave (stated by 53 parents).

- 1.16.3 Parents were also asked to state a description which they believed *best described* the present circumstances/occupation of any partner.
86% of respondents had a partner and the incidence of their circumstances/occupation are presented in Table 30 below.

Table 30 - Circumstances of partners

Circumstances of any partner	Percentage of respondents
In full-time employment/self-employment (30 hours+/week)	74%
In part-time employment/self-employment (<30 hours/week)	9%
Self employed	0
Not currently in work (at home raising children)	2.5%
Retired	<1%
Studying full-time	<1%
Volunteering	<1%
Other	12.5%

Table 30 indicates that the most frequent classification of a partner was them being in full-time employment of over 30 hours/week. Indeed, the majority of partners were evidently *currently* in a type of paid employment – i.e. they were *also* working parents.

- 1.16.4 In terms of Ethnicity of Parents, Table 31 indicates that the most frequent ethnicity of the parents was White British (one-third of parents), followed in frequency by White Other (18% of parents).

The following responses were repeatedly given by those parents who stated 'Other':

- Turkish
- Kurdish
- Somali

Table 31 - Ethnicity of responding parents

Stated Ethnicity	Percentage of parents
White	
White UK	33%
White Other	18%
Asian	
Asian Bangladeshi	1.5%
Asian Indian	1.5%
Asian Pakistani	1.5%
Asian Other	1.5%
Asian Chinese	1%
Black	
Black African	8%
Black Caribbean	9%
Black Other	1%
Mixed	
Mixed White and Black	4%
Mixed White and Asian	1%
Other Mixed	0
Other	
European	7%
South American	1%
Other	5%
Rather not say	6%

- 1.16.5 In terms of the faith of parents, Table 32 indicates that the most frequent faith stated was Christian (33% of parents), followed in frequency by: no religion (32% of parents).

Table 32 - Faith of parents

Stated Faith	Percentage of parents
Buddhist	1%
Christian	35%
Hindu	1%
Jewish	5%
Muslim	11%
Sikh	1%
No religion	32%
Other ⁸	1%
Rather not say	13%

- 1.16.6 In terms of Incidence of children having SEND, all of the responding parents/carers were invited to state whether any of their children had SEND. 5% of the relevant children being raised by responding parents/carers evidently had a type of SEND, detailed in Table 33, and their average age was 5 years.

Table 33 - Incidence of a child having a specific type of SEND

SEND type	Number of relevant children
Speech, Language and Communication Difficulties	9
Autistic Spectrum Conditions	27
Social, Emotional and Mental Health Difficulties	1
Moderate Learning Difficulties	3
Visual Impairment	0
Hearing Impairment	0
Global Development Delay	1
Physical/Mobility Disability	1
Other ⁹	12

Table 33 indicates that the type of SEND which the children and young people aged 0 – 19 years of the responding parents/carers most frequently had was an Autistic Spectrum Condition. 64% of applicable parents stated that they claimed Disability Living Allowance for their applicable child – and 36% stated that they did not.

- 1.16.7 Table 34 shows the extent to which formal childcare was being accessed aligned to the age group of a child.

Table 34 - Extent to which formal childcare was being accessed aligned to the age group of a child

Circumstance	0 – 12 months Age Group	1 years Age Group	2 years Age Group	3 – 4 years Age Group	5 – 11 years Age Group	12 – 19 years Age Group
Percentage of respondents using some formal childcare	42%	46%	62%	88%	49%	15%
Percentage of respondents using some informal childcare	8%	16%	18%	16%	16%	13%
Percentage of respondents using no childcare	54%	45%	31%	8%	44%	72%

- 1.16.8 Households with the highest reported income are more likely to use childcare. In terms of Annual Family Household Incomes, Table 35 indicates that the most frequent annual household income (before tax) of responding parents was £30,000 – £54,999. 1 : 12 of the responding parents evidently had an annual household income of £100,000 or over

⁹ The 'Other' SEND types included: Achondroplasia; Cortisol deficiency; Leukemia; Heart condition; Reynold Syndrome; Williams Syndrome.

– which would not affect their eligibility to receive the 30 hours childcare offer as the eligibility allows each parent to earn up to £100,000 each.

Table 35 - Annual family household incomes - (before) tax

Annual Household income (Ranges)	Percentage of respondents
Up to £16,190	8%
£16,190 - £29,999	12%
£30,000 - £54,999	19%
£55,000 - £99,999	17%
£100,000 or above	8%
I don't know	12%
I would rather not say	24%

Table 36 - Incidence of annual family household incomes aligned to Network Learning Community

Network Learning Community	Up to £16,190	£16,190 - £29,999	£30,000 - £54,999	£55,000 - £99,999	£100,000 and above
Highgate/Muswell Hill	0%	9%	17%	19%	5%
Hornsey/Stroud Green	2%	8%	18%	32%	18%
Wood Green	14%	15%	18%	19%	7%
Harringay/West Green	6%	9%	17%	15%	10%
North East Tottenham	14%	13%	14%	13%	4%
South East Tottenham	10%	14%	22%	17%	7%
Average	8%	12%	19%	17%	8%

Note: additional responses included: don't know and rather not say – see Table 35

Table 37 outlines the incidence of formal childcare usage aligned to annual household income amount, with formal childcare most frequently being accessed by those whose annual household income was less than £16,190.

Table 37 - Use of childcare by reported annual household income

Reported Household Income	Up to £16,190	£16,190 - £29,999	£30,000 - £54,999	£55,000 - £99,999	£100,000 +
Percentage of respondents using <i>formal</i> childcare	71%	58%	44%	60%	64%

- 1.16.9 Table 38 below indicates that the use of formal childcare was highest in the Network Learning Community of Hornsey/Stroud Green – which also had the highest reported levels of household income, and lowest in Network Learning Community North East Tottenham.

Table 38 - Incidence of usage of formal childcare aligned to (a) ward and (b) Network Learning Community

Ward and Network Learning Community	Percentage of respondents using <i>formal</i> childcare
Network Learning Community: Highgate/Muswell Hill	
Alexandra	35%
Fortis Green	56%
Highgate	50%
Muswell Hill	80%
Average NLC	56%
Network Learning Community: Hornsey/Stroud Green	
Crouch End	56%
Hornsey	74%
Stroud Green	70%
Average NLC	68%
Network Learning Community: Wood Green	
Bounds Green	52%
Noel Park	55%
Woodside	50%
Average NLC	62%
Network Learning Community: Harringay/West Green	
Harringay	65%
St. Ann's	47%
West Green	53%
Average NLC	53%
Network Learning Community: North East Tottenham	
Northumberland Park	38%
White Hart Lane	78%
Average NLC	43%
Network Learning Community: South East Tottenham	
Bruce Grove	56%
Seven Sisters	43%
Tottenham Green	49%
Tottenham Hale	36%
Total NLC	48%

1.16.10 In terms of use of childcare by all responding parents/carers, Table 39 and Table 40 below indicates that the use of childminding is highest for the youngest age range of children.

Use of family members to provide childcare is relatively high across all age ranges but particularly for the youngest age range of children. Use of a day nursery was, as would be expected, high for the 2 year old and 3 – 4 year old age ranges.

Table 39 - Evident childcare usage for children aged 0 – 4 years, aligned to total children being raised by all parents that have a child in relevant age group

Age Group	PVI Sector Day Nursery	Pre-School/Playgroup	Maintained Nursery Class or Nursery School	Registered Childminder	Out of School Childcare	Grandparents	Other family members	Friends	Au-Pair	Other
Under 2 years	13%	0	0	7%	0	9%	3%	0	1%	1%
2 years	46%	2%	1%	5%	0	13%	2%	0	3%	5%
3 – 4 years	54%	2%	19%	3%	3%	10%	2%	0	3%	5%

Table 39 and Table 40 indicates that family and friends play an important role in the childcare mix for younger and older children, and in particular for children aged 3 – 4 years.

Table 40 - Evident childcare usage for children aged 5 – 17 years, aligned to total children being raised by all parents that have a child in relevant age group

Age Group	After School Club	Breakfast/Before School Club	Holiday Playscheme	Registered Childminder	Grandparents	Other family members	Friends	Au-Pai	Other
5 – 11 years	15%	5%	6%	2%	12%	3%	2%	2%	0
12 – 14 years	0	0	0	0	14%	9%	0	2%	0

1.16.11 All responding parents of 0 – 19 year olds were invited to state how satisfied they were with their present childcare arrangements, i.e. the extent to which they currently met their needs. Table 41 presents the frequency with which they provided certain responses aligned to their childcare circumstances and the age groups of their children.

Table 41 - Extent to which parents, that were formal childcare users only, were satisfied with that arrangement aligned to age cohorts

Satisfaction Level	Parent with at least one under 1 year old	Parent with at least 1 year old	Parent with at least one 2 year old	Parent with at least one 3-4 year old	Parent with at least one 5-11 year old	Parents with at least 12-14 year old
Percentage of respondents stating Very Satisfied or Quite Satisfied	95%	89%	91%	95%	94%	88%

Table 42 - Extent to which parents, who did not use any childcare, were satisfied with that arrangement aligned to age cohorts

Satisfaction Level	Parent with at least one under 1 year old	Parent with at least 1 year old	Parent with at least one 2 year old	Parent with at least one 3-4 year old	Parent with at least one 5-11 year old	Parents with at least 12-14 year old
Percentage of respondents stating Very Satisfied or Quite Satisfied	89%	91%	96%	94%	95%	95%

1.17 Feedback from parents who evidently used formal registered childcare

- 1.17.1 Applicable parents were invited to state what type(s) of formal childcare that their child(ren) were accessing.

Table 43 - Incidence of usage of formal childcare by applicable children aged 0 – 4 year olds

Type of formal childcare	Accounted for the following percentage of total usage by the relevant children aged 0 – 4 years
PVI sector day nursery – full or part-time	66%
Pre-school or playgroup i.e. sessional childcare	2%
Maintained nursery class	15%
Registered childminder	10%
After school club	1%
Breakfast club	1%
Holiday playscheme	1%
Other ¹⁰	8%

¹⁰ Most frequently: Nursery at a Children's Centre, followed in frequency by a Home Childcarer.

Table 44 - Incidence of usage of formal childcare by applicable children aged 5 – 19 year olds

Type of formal childcare	Accounted for the following percentage of total usage by the relevant children aged 5 – 19 years
PVI sector day nursery – full or part-time	0
Pre-school or playgroup i.e. sessional childcare	0
Maintained nursery class	0
Registered childminder	11%
After school club	86%
Breakfast club	20%
Holiday playscheme	29%
Other ¹¹	0

The most frequent type of childcare – evidently being accessed by those parents/children who were only using formal childcare was a PVI sector day nursery an after school club and a registered childminder.

The most frequent reason stated for using formal childcare was: so that I can go to work or study (69% of applicable parents – who were most frequently resident in the Highgate and Muswell Hill Network Learning Community).

The second most frequent reason stated for using formal childcare by this cohort of respondents was: so that my children can socialise and play with other children (57% of applicable parents). In terms of (the question) *what was important to parents when choosing a formal childcare setting?*, the most frequent response was: that it was close to home (90% of applicable parents), followed in frequency by: the childcare setting being close to another of my children's school(s). Finally, applicable parents were invited to state whether they intended to use any formal childcare in the next two years, which they were not, in early 2019, currently accessing. 19% of applicable parents stated that they did, and this was most frequently, in terms of early years childcare, a maintained nursery class (stated by 7% of applicable parents, who were most frequently resident in the Harringay and West Green Network Learning Community), and in terms of out of school childcare, an after school club (stated by 1 : 4 of applicable parents, who were most frequently resident in the South East Tottenham Network Learning Community).

1.17.2 In terms of this cohort's **experiences of formal childcare usage...**

applicable parents were invited to outline the number of hours/week they accessed formal childcare in the term-time period and during the (school) holidays. For term-time(s), the average number of weekly hours stated was 23. The most frequent number of hours stated was, as would be expected, 30 followed by 40. For holiday time(s), the average number of weekly hours stated was 13. The most frequent number of hours stated was 40 followed by 30 (the opposite metrics as to what were observed for term-times (see above)).

¹¹ Most frequently: Nursery at a Children's Centre, followed in frequency by a Home Childcarer.

- 1.17.3 Parents of 0 – 4 and 5 – 19 year olds who stated that they were accessing formal childcare (only) in early 2019 were invited to state if *they* had ever experienced any barriers to accessing early years childcare.

Table 45 presents the frequency with which they provided specific responses:

Table 45 - Incidence of barriers experienced by responding parents of 0 – 4 year olds and 5 – 19 year olds who were accessing formal childcare (only) in early 2019

Barrier type	Percentage of applicable parents
None – I have never experienced a barrier(s)	62%
I could not/cannot find a space for my child at a chosen childcare provider	5%
I could not/cannot find a childcare provider to offer the times/hours that I need	6%
I could not/cannot afford the childcare that I require	27%
I had doubts about the quality of provision	6%
Preferred provider had a waiting list	7%
Other	4%

Note: Individual parents were able to state multiple barriers.

Encouragingly almost two-thirds of applicable parents, of both 0 – 4 year olds and 5 – 19 year olds, stated that they had not – at any point in time – experienced any of the barriers presented in Table 45 above. However, Table 45 does indicate that the most frequent barrier that *had been* experienced by those parents who were accessing formal early years childcare (only) was: I could not/cannot afford the childcare that I require (1 : 4 of applicable respondents), followed in frequency by a relevant parent – most frequently of a 0 – 4 year old – stating: my preferred provider had a waiting list. The applicable responding parents who stated: I could not/cannot afford the childcare that I require were most frequently resident in the North West Tottenham Network Learning Community. The applicable responding parents who stated: my preferred provider had a waiting list were most frequently resident in the Harringay and West Green Network Learning Community and these were most frequently parents of 0 – 4 year olds.

The most frequent ‘Other’ barrier stated was (words to the effect) *“It is hard to find a place at a childcare setting for an under 1 year old”*.

- 1.17.4 Parents who stated that they were accessing formal childcare (only) in early 2019 and who had at least one child aged 3 or 4 years were invited to state whether they were accessing the 30 hours childcare offer?

37% of relevant parents stated that they were and 63% of parents stated that they were not. Parents of 3 or 4 year olds who stated *that they were* accessing a 30 hours childcare offer place in early 2019 were most frequently resident in the Stroud Green ward.

Parents of 3 or 4 year olds who stated *that they were not* accessing a 30 hours childcare offer place in early 2019 were most frequently resident in the Tottenham Green ward.

- 1.17.5 The parents of 3 and 4 year olds *who were* accessing the 30 hours childcare offer, were invited to state whether they considered that the 30 hours childcare offer was helping them and/or a partner to remain in work or to take up employment...

79% of applicable parents stated: Yes, it has helped me and/or a partner to remain in employment/self-employment/a job.

5% of applicable parents stated: Yes, it has helped me and/or a partner to take up a part-time job/part-time self-employment.

5% of applicable parents stated: Yes, it has helped me and/or a partner to take up a full-time job/full-time self-employment.

11% of the applicable parents stated that their (working) circumstance(s) had not been in anyway affected by the childcare offer.

- 1.17.6 Additionally, the responding and applicable (formal childcare only using) parents of 3 and 4 year olds, *who were* accessing the 30 hours childcare in early 2019 were invited to state how 'easy' they had found securing a 30 hours childcare place.

- 44% of applicable parents stated: it was very easy
- 37% of applicable parents stated: It was fairly straightforward
- 10% of applicable parents stated: It was not as easy as I would have liked
- 8% of applicable parents stated: It was complicated and/or stressful
- 3% of applicable parents stated: none of the above

Those applicable parents who stated (a) It was not as easy as I would have liked or (b) It was complicated and/or stressful were most frequently resident in the Noel Park ward. The same cohort of responding parents were requested to state the reason(s) for their response. The most frequent reason was evidently (words to the effect):

"The system is too complicated/difficult" i.e. reconfirmation process.

The second most frequent reason was evidently (words to the effect):

"My preferred setting did not offer the 30 hours".

Additional *repeated* types of responses included:

"Having to re-confirm my eligibility every three months".

"It's a time-consuming process, especially having to go through HMRC".

“Found it a stressful process to set up”.

- 1.17.7 The responding and applicable (formal childcare only using) parents of 3 and 4 year olds, *who were* accessing the 30 hours childcare offer were invited to state the type of venue(s) where their child(ren) attended such a place in early 2019 – see Table 46 below.

Table 46 - Frequency with which applicable children of ‘users’ of the 30 hours childcare offer had therefore accessed – or were accessing – such a place

Type of early years childcare provider	Percentage of applicable children
PVI sector day nursery – full or part-time	75%
Pre-school or playgroup i.e. sessional childcare	0
Maintained nursery class	17%
Registered childminder	2%

Table 46 *indicates* that the type of London Borough of Haringey-based early years childcare provider that was being accessed in early 2019 in order to take-up a 30 hours childcare offer place was – by a significant margin – a PVI sector day nursery, followed in frequency by a maintained school nursery class. It was observed that only 2% of applicable parents of 3 and/or 4 year olds were accessing a 30 hours childcare offer place with a registered childminder.

The same cohort of parents was requested to confirm how many hours (up to 30) they had normally accessed the offer on a typical applicable week.

The most frequently stated number of such hours was – as would be expected – 30. The average number stated was 29 hours – and 45 minutes.

- 1.17.8 63% of the responding parents of 3 and 4 year olds (*were* only using formal childcare at the time of the research) *were not* however accessing the 30 hours childcare offer. Table 47 indicates the frequency with which reasons why this was the case were stated by applicable parents of 3 and 4 year olds.

Table 47 - Reasons why (formal childcare using only) parents of 3 and 4 year olds were not accessing the 30 hours childcare offer

Reason	Percentage of applicable parents
I do/did not <i>think</i> that I am/was eligible for the 30 hour childcare offer	83%
I do/did <i>not know if</i> I am/was eligible to use the 30 hour childcare offer	0
I do/did not know how to register for the 30 hour childcare offer	0
I do/did not <i>need to</i> use the 30 hour childcare offer	2%
I do/did not <i>want to</i> use the 30 hour childcare offer	1%
I prefer to access the universal 15 hours free entitlement for 3 and 4 year olds	3%
I cannot/could not find a suitable childcare provider who offers a place	0
I cannot/could not find a childcare provider that can offer suitable times for me to use the 30 hour childcare offer	0
Extra charges made/make the 30 hours inaccessible for me, at my chosen provider	0
Other	11%

Table 47 outlines that the most frequent reason why a responding – formal childcare using – parent of at least one child aged 3 and/or 4 years was not accessing the 30 hours childcare offer within the London Borough of Haringey was: I do/did not *think* that I am/was eligible for the 30 hour childcare offer. This response was most frequently stated by applicable parents that were resident in the South East Tottenham Network Learning Community. Those applicable parents who stated ‘Other’ most frequently stated (words to the effect):

“My child is just about to start in a Reception class”.

- 1.17.9 The responding (formal childcare only using) parents of 3 and 4 year olds who *were not* accessing the 30 hours childcare offer during early 2019 stated that *if a 3 – 4 year old of theirs did so in the future*, they most frequently envisaged that this would be at a PVI sector day nursery – and that they would seek to access the full 30 hours.
- 1.17.10 All responding parents who were evidently accessing formal childcare only and who had at least one child aged 2 years were invited to state whether they were accessing a funded entitlement for 2 year olds place in early 2019. (Only) 12% of applicable responding parents stated that they were.

88% of applicable responding parents stated that they were not and the two most frequent reasons for this position were (in order of frequency):

1. (In the majority of cases) I am not eligible to receive the funded entitlement for 2 year olds
2. I am eligible, but do not feel I need to use the entitlement (a statement most frequently made by relevant parents that were resident in the Woodside ward

1.18 Feedback from parents who evidently used formal registered childcare and informal childcare (such as grandparents, other family members and friends)

- 1.18.1 Applicable parents were invited to state what type(s) of formal childcare and informal childcare that their child(ren) were accessing.

Table 48 - Incidence of usage of formal and informal childcare by applicable children aged 0 – 19 year olds

Type of formal and informal childcare	Accounted for the following percentage of total usage by the relevant children aged 0 – 4 years
Formal childcare	
PVI sector day nursery – full or part-time	61%
Pre-school or playgroup i.e. sessional childcare	3%
Maintained nursery class	5%
Registered childminder	5%
After school club	2%
Breakfast club	2%
Holiday playscheme	2%
Informal childcare	
Grandparents	69%
Other family member(s)	12%
Friends	2%
Nanny/Au-pair	12%

Table 49 - Incidence of usage of formal and informal childcare by applicable children aged 5 – 19 year olds

Type of formal and informal childcare	Accounted for the following percentage of total usage by the relevant children aged 5 – 19 years
Formal childcare	
PVI sector day nursery – full or part-time	0
Pre-school or playgroup i.e. sessional childcare	0
Maintained nursery class	0
Nursery school/class in an independent school	0
Registered childminder	10%
After school club	40%
Breakfast club	35%
Holiday playscheme	25%
Informal childcare	
Grandparents	75%
Other family member(s)	20%
Friends	20%
Nanny/Au-pair	10%

The most frequent type of formal or informal childcare – being accessed by those parents who were using both, was grandparents, followed in frequency by a PVI sector day nursery and an after school club.

- 1.18.2 Applicable parents were invited to outline the number of hours per week *they accessed their formal childcare element* in the term-time period and during the (school) holidays.

For term-time(s), the average number of weekly hours stated was approximately 18. The most frequent number of hours stated was, as would be expected, 30 followed by 15.

For holiday time(s), the average number of weekly hours stated was approximately 12. The most frequent number of hours stated was 18.

- 1.18.3 Parents of 0 – 19 year olds who stated that they were accessing at least one type of formal childcare *and* at least one type of informal childcare place in early 2019 were invited to state if *they* had ever experienced any barriers to accessing *formal* early years childcare. Table 50 presents the frequency with which they provided specific responses:

Table 50 - Incidence of barriers experienced by parents of 0 – 4 year olds and 5 – 19 year olds who were accessing at least type of formal and informal childcare place in early 2019

Barrier type	Percentage of applicable parents
None – I have never experienced a barrier(s)	50%
I could not/cannot find a space for my child at a chosen childcare provider	8%
I could not/cannot find a childcare provider to offer the times/hours that I need	10%
I could not/cannot afford the childcare that I require	33%
I had doubts about the quality of provision	8%
I did not know where to find information about childcare	6%
Religious/cultural reasons	2%
Preferred provider had a waiting list	4%
There is nothing suitable for my child with SEND	2%
Other	6%

Note: Individual parents were able to state multiple barriers.

Encouragingly 50% of applicable parents stated that they had not – at any point in time – experienced any of the barriers presented in Table 50 above. However, Table 50 indicates that the most frequent barrier that *had been* experienced by those parents who were accessing at least one type of formal early years childcare *and* at least one type of informal childcare was being unable to afford their preferred childcare (1 : 3 of applicable parents who were most frequently referring to a child aged 0 – 4 years), followed in frequency by a relevant parent (commonly of 0 – 4 year old) stating: I could not/cannot find a childcare provider to offer the times/hours that I need.

The most frequent 'Other' barrier stated was (words to the effect) *"My worries about leaving with child with someone else"*.

- 1.18.4 Parents of 0 – 19 year olds who stated that they were accessing at least one type of formal childcare *and* at least one type of informal childcare place in early 2019 were invited to state how satisfied they were with their present childcare arrangements. Table 51 presents the frequency with which they provided certain responses:

Table 51 - Satisfaction among users of formal childcare about their existing arrangements

Degree of Satisfaction	Percentage of applicable parents
Very Satisfied	67%
Quite Satisfied	25%
Quite Dissatisfied	2%
Very Dissatisfied	4%
Not Sure	2%

Table 51 indicates that approximately 6% of users of at least one type of formal childcare *and* at least one type of informal childcare place in early 2019 were, to some degree, not satisfied with their current arrangements. The response Quite or Very Dissatisfied, when provided, tended to originate from an applicable respondent who was resident in the Wood Green Network Learning Community.

- 1.18.5 The sample of parents who stated that they were accessing at least one type of formal childcare *and* at least one type of informal childcare place who had at least one child aged 3 – 4 years were invited to state whether they were accessing the 30 hours childcare offer in early 2019.
50% of all of the relevant responding parents were accessing the 30 hours childcare offer during its first year of full roll-out.

- 1.18.8 The applicable sample of parents of 3, 4 and 5 year olds, *who had* accessed the 30 hours childcare offer were invited to state the type of venue(s) where their child(ren) had attended such a place – see Table 52 below.

Table 52 - Frequency with which applicable children of 'users' of the 30 hours childcare offer had therefore accessed – or were accessing – such a place during the period September 2017 – February 2019 at a specific type of venue

Type of early years childcare provider	Percentage of applicable children
PVI sector day nursery – full or part-time	60%
Pre-school or playgroup i.e. sessional childcare	20%
Maintained nursery class	10%
Registered childminder	10%

Table 52 *indicates* that the type of London Borough of Haringey-based early years childcare provider that was being accessed during the period (autumn) 2017 – (spring) 2019 in order to take-up a 30 hours childcare offer place by applicable parents was – by

a significant margin – a PVI sector day nursery, followed in frequency by a pre-school/playgroup. It was observed that (only) 10% of applicable parents of 3 and/or 4 year olds had accessed a 30 hours childcare offer place at a registered childminder. The same cohort of parents was requested to confirm how many hours (up to 30) they had normally accessed on a typical applicable week.

The most frequently stated number of such hours was – as would be expected – 30.

- 1.18.9 50% of the responding parents of 3, 4 and 5 year olds who stated that they were accessing at least one type of formal childcare *and* at least one type of informal childcare at the time of the research *had not* however accessed the 30 hours childcare offer during its first year of full roll-out... In the majority of cases this was because they were not or did not consider themselves eligible to do so.
- 1.18.10 All responding parents who were evidently accessing formal childcare and informal childcare and who had at least one child aged 3 and/or 4 years were (also) invited to state whether they were accessing the universal 15 hours funded entitlement for 3 and 4 year olds place in early 2019.
41% of applicable responding parents stated that they were. 59% of applicable responding parents stated that they were not – and this was (by a significant margin) most frequently (now) due to the advent of the 30 childcare offer, which they were now accessing instead, or soon to be accessing (85% of applicable respondents).
- 1.18.11 All responding parents who were evidently accessing formal childcare and informal childcare and who had at least one child aged 2 years were invited to state whether they were accessing a funded entitlement for 2 year olds place in early 2019. (Only) 12% of applicable responding parents stated that they were (and such parents were most frequently resident in the Tottenham Hale ward). 88% of applicable responding parents stated that they were not and the single stated repeated reason for this position was: I am not eligible to receive the funded entitlement for 2 year olds.

1.19 Feedback from parents who do not use any formal registered childcare, but who may use informal *unregistered* childcare

1.19.1 14% of applicable parents were accessing at least one type of informal childcare.

Table 53 - Incidence of usage of informal childcare by children of responding parents of 0 – 4 year olds

Type of informal childcare	Accounted for the following percentage of total usage by the relevant children aged 0 – 4 years
Grandparents	69%
Other family member(s)	22%
Friends	0
Nanny/Au-pair	17%
Other	0

Table 53 indicates that the most frequent type of informal childcare – being accessed by applicable parents was grandparents, followed in frequency by friends. It was observed that the Tottenham Hale ward accounted for the most pronounced use of grandparents by applicable parents.

Table 54 - Incidence of usage of informal childcare by children of responding parents of 5 – 19 year olds

Type of informal childcare	Accounted for the following percentage of total usage by the relevant children aged 5 – 19 years
Grandparents	96%
Other family member(s)	35%
Friends	4%
Nanny/Au-pair	15%
Other	4%

Table 54 indicates that the most frequent type of informal childcare – being accessed by applicable parents was grandparents, followed in frequency by friends. It was observed that the Tottenham locality accounted for (by a significant margin) the most pronounced use of grandparents by applicable parents.

- 1.19.2 Parents who *did not access any formal childcare* were therefore requested to confirm why they were not currently doing so.

Table 55 - Reasons for not accessing formal childcare

Reason(s) for not accessing formal childcare	Percentage of responses
I do not need formal childcare	51%
I find formal childcare too expensive	27.5%
I prefer my children to be looked after by family and/or friends	12.5%
I do not want to use formal childcare	11.5%
I don't receive financial assistance to help me pay for childcare	4.5%
I think my child(ren) are better looked after by family or friends	4%
(As far as I know) there are no vacancies in my area	4%
There are no suitable/preferred places local to me	3.5%
Concerns about leaving my child with people I don't know	3.5%
I do not trust the quality of childcare	3%
Formal childcare is not reliable enough	1%
No suitable childcare to meet special needs or disabilities	1%
Other	14%

Note: parents were able to state multiple reasons.

Those applicable (27.5% of) parents who stated: I find formal childcare too expensive were most frequently resident in the South East Tottenham Network Learning Community area.

Those parents who stated 'Other' reason(s), repeatedly – i.e. in 15 or more cases – fed back (words to the effect) that:

"I feel my child is too young for formal childcare", and...

"...because I am currently on maternity leave".

- 1.19.3 None of the applicable respondents were accessing either (a) the funded entitlement for 2 year olds (b) the universal 15 hours funded entitlement for 3 and 4 year olds or (c) the 30 hours childcare offer. It was evident that the majority of such parents with a 2 – 4 year old had heard of all three entitlements, however they either did not want to access one, or in the case of the free entitlement for 2 year olds, they were not eligible to do so.
- 1.19.5 Responding and applicable parents with at least one 0 – 2 year old(s) were invited to state whether they believed that they might access the 30 hour childcare offer in the future for any of their applicable children. Approximately 70% stated that they did, and they most frequently envisaged that this would be with a PVI sector day nursery.

The same cohort of parents were invited to state how many hours of the (maximum) 30 they *envisaged* they would potentially take-up – should they access the 30 hours childcare offer in the (near) future? The most frequently stated number was 30 hours and the average number of hours stated was 29 hours and 6 minutes.

- 1.19.6 Parents of 0 – 4 year olds and 5 – 19 year olds who *did not access any formal childcare* were invited to state what they would look for, if they were to consider accessing formal childcare provision.

Table 56 presents the frequency with which they stated specific responses.

Table 56 - Features which non-users of formal childcare evidently would look for if/when they considered accessing such provision

Feature	Percentage of applicable parents
Not applicable as I won't	27%
Good quality childcare	63%
Affordable childcare	39%
For it to be close to my home	36%
For it to be close to my work	36%
Flexible Hours/Ad hoc availability	26%
For there to be play opportunities	18%
Social opportunities for my child(ren)	18%
Somewhere I can use one of the free entitlements	13.5%
Transport to be straightforward	8%
Choice of different childcare types	6%
For it to be close my children's school	4.5%
To have it funded via Universal Credit or Tax-Free Childcare	4%
Provision for additional needs/disabilities	2%
Other	9%

Table 56 indicates that the most frequent feature which those responding parents who were only accessing informal childcare in early 2019 stated that they would welcome if they were to consider accessing such provision was good quality childcare, followed in frequency by affordable childcare (which was most frequently stated by parents who were resident in the Northumberland Park ward).

The response (for there to be) flexible hours/ad hoc availability was most frequently stated by parents who were resident in the Tottenham locality.

The response "Other" was most frequently further clarified to be (words to the effect): *"For there to be good educational opportunities for my child"*.

2 Supply analysis

This second section of the 2019 Haringey Childcare Sufficiency Assessment focuses on the (subjects and issues related to the) supply childcare.

2.1 Fundamental supply and quality of childcare in the London Borough of Haringey

2.1.1 Table 57 below present three key indicators – by type of childcare provider –aligned to the entire London Borough of Haringey locality:

1. Number of childcare providers by ward
2. Total Number of places in the ward
3. Percentage of childcare providers with a Good or Outstanding Ofsted

Table 57 - Supply and quality in early 2019 observed across the London Borough of Haringey

Type of Provider	Number of providers in Haringey	Total number of places in Haringey	% with Met, Good or Outstanding Ofsted
Early Years Childcare			
PVI Day Nursery	61	2,791	83% 6 = No Ofsted yet
Maintained School Nursery Class	46	2,673	98%
Pre-School Playgroup	15	327	87%
Maintained Nursery School	3	1,353	100%
Local Authority Children's Centre Day Nursery ¹²	5	435	100%
Registered Childminder			
	177	1,096	79% 10 = No Ofsted yet
Out of School Childcare			
After School Club	40	1,397	60% 18 = No Ofsted yet
Before/ Breakfast Club	36	1,342	97% 1 = No Ofsted yet
Holiday Playscheme	9	310	55% 6 = No Ofsted yet

¹² Accounts for three Children's Centres and Stonecroft Nursery Triangle Children, Young People and Community Centre

2.2 Providers Audit - Periods that provision typically operates

2.2.1 Table 58 - Frequency with which the responding London Borough of Haringey's early years childcare providers state that they typically operate

(Annual) period of availability	Percentage of PVI settings	Percentage of maintained nursery classes	Percentage of registered childminders
Term-time only	33%	93%	8%
All-year round	67%	7%	92%
Other	0	0	0

2.2.2 Table 58 indicates that the most frequent annual period of accessibility/availability reported by early years childcare settings was term-time only, whilst registered childminders also most frequently stated all-year round.

2.2.3 Table 59 indicates the (a) most frequent weekday start time and the (b) evident most frequent weekday finish time stated by *responding* early years childcare providers/settings and registered childminders. It also indicates the average weekday start time and the average weekday finish time that was reported.

Table 59 - Evident most frequent weekday start times and the evident most frequent weekday finish times stated by responding early years childcare providers/settings and registered childminders

Type of early years childcare provision	Most frequent opening/ start time	Most frequent closing/ finish time	Average opening/ start time	Average closing/ Finish time
PVI Setting	8.30am	6.00pm	8.06am	5.07pm
Maintained Nursery Class	8.45am	3.30pm	8.28am	3.29pm
Registered childminder	8.00am	6.00pm	8.05am	6.06pm

- 2.2.4 Table 60 indicates the (a) most frequent weekday start time and the (b) evident most frequent weekday finish time stated by *responding* out of school childcare providers/settings. It also indicates the average weekday start time and the average weekday finish time that was reported.

Table 60 - Evident most frequent weekday start times and the evident most frequent weekday finish times stated by responding out of school childcare providers

Type of out of school provision	Most frequent opening/ start time	Most frequent closing/ finish time	Average opening/ start time	Average closing/ finish time
After School Club	3.15pm	6.00pm	3.20pm	6.20pm
Breakfast Club	7.00am	8.45am	7.20am	8.37am
Holiday Playscheme	8.30am	6.00pm	8.23am	5.10pm

- 2.2.5 All of the term time out of school childcare representatives were asked whether their setting provides any collection services as part of their offer (for example, a bus to take children to or from their school from to your childcare site). 45% of after school clubs stated that they did and this was most frequently a 'walking bus'¹³ followed in frequency by a mini bus collection. The Wood Green Network Learning Community area most frequently accounted for such an offer, followed in frequency by the North East Network Learning Community area.
- 20% of breakfast clubs stated that they did and this was most frequently a 'walking bus' to the schools.

¹³ A walking bus is a form of transporting pupils from one site to another. This may be from a breakfast club to a school, or a school to an after school club. Children are escorted by a minimum of 2 adults, with designated 'bus stops' to pick-up children.

2.3 Supply of funded entitlement places – and feedback about the evolving 30 hours childcare offer

- 2.3.1 All *responding* (a) PVI settings and (b) maintained nursery classes were invited to state whether they were offering 30 hours childcare places at their setting in 2019. 80% of PVI settings and 95% of maintained nursery classes stated that they were.

Diagram 19 - Incidence of take-up and potential future provision of 30 hours childcare offer places – as stated by responding PVI settings in 2019 that are located in each of the 19 wards

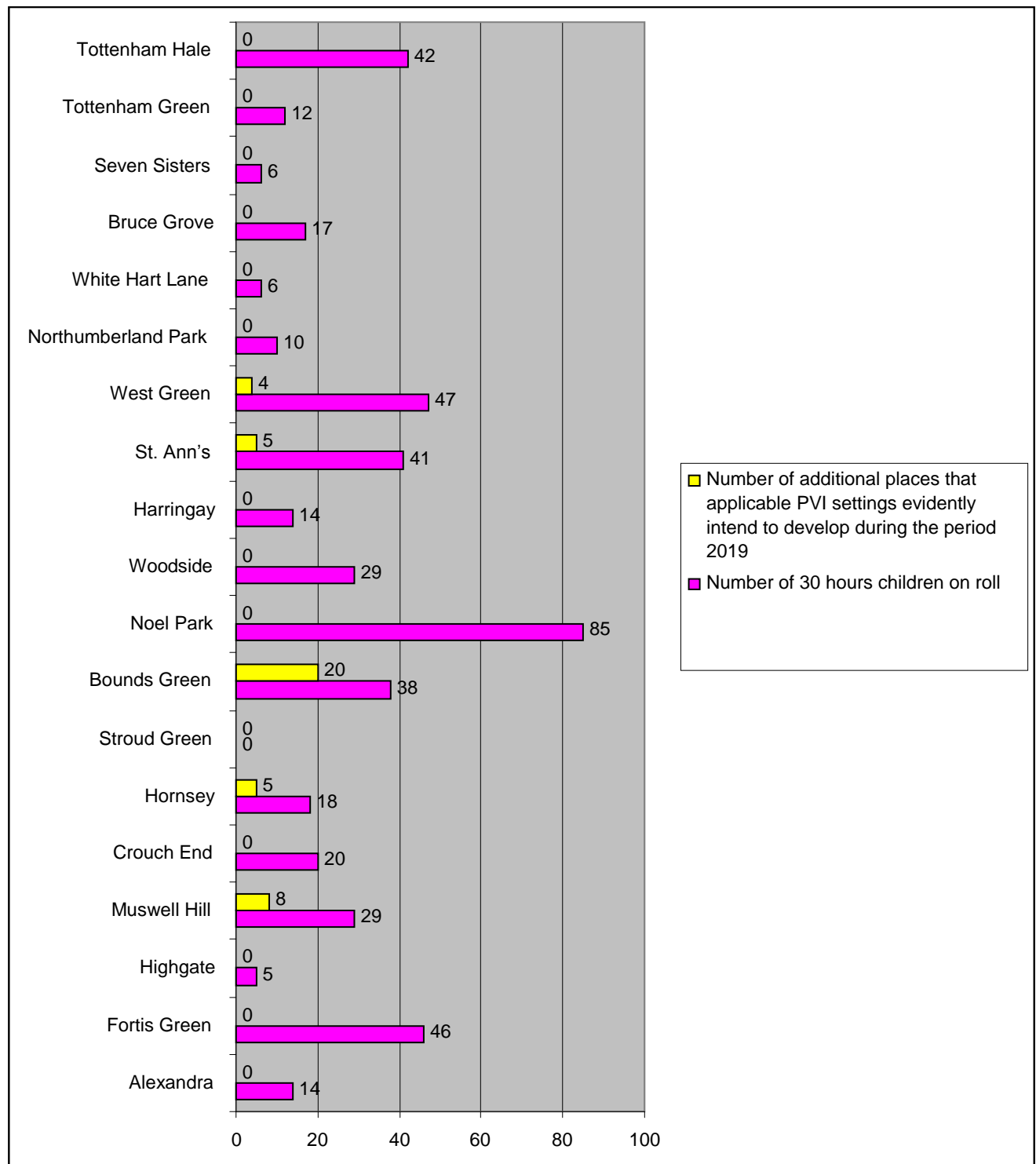


Diagram 20 - Incidence of take-up and potential future provision of 30 hours childcare offer places – as stated by responding maintained nursery classes in 2019 that are located in each of the 19 wards

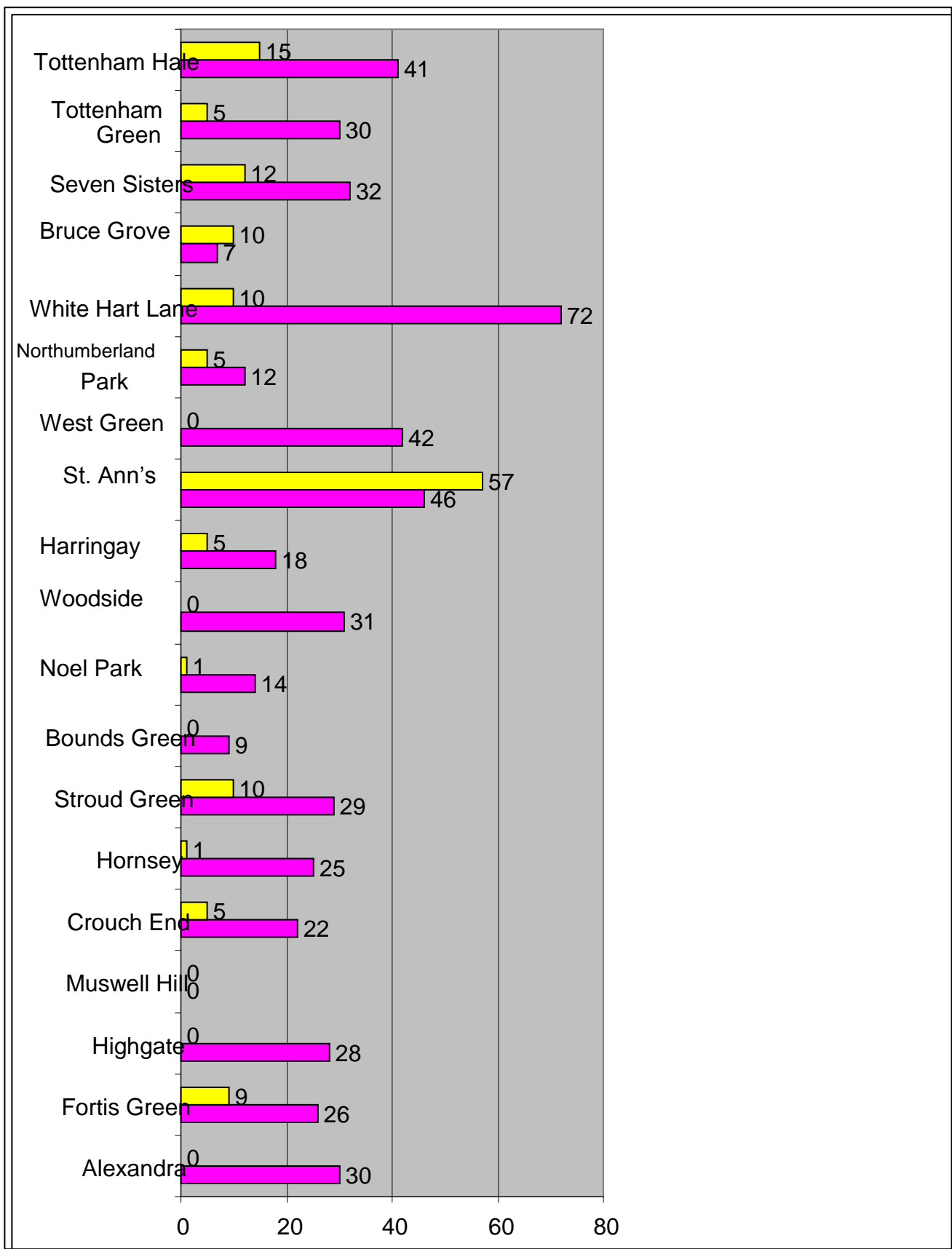
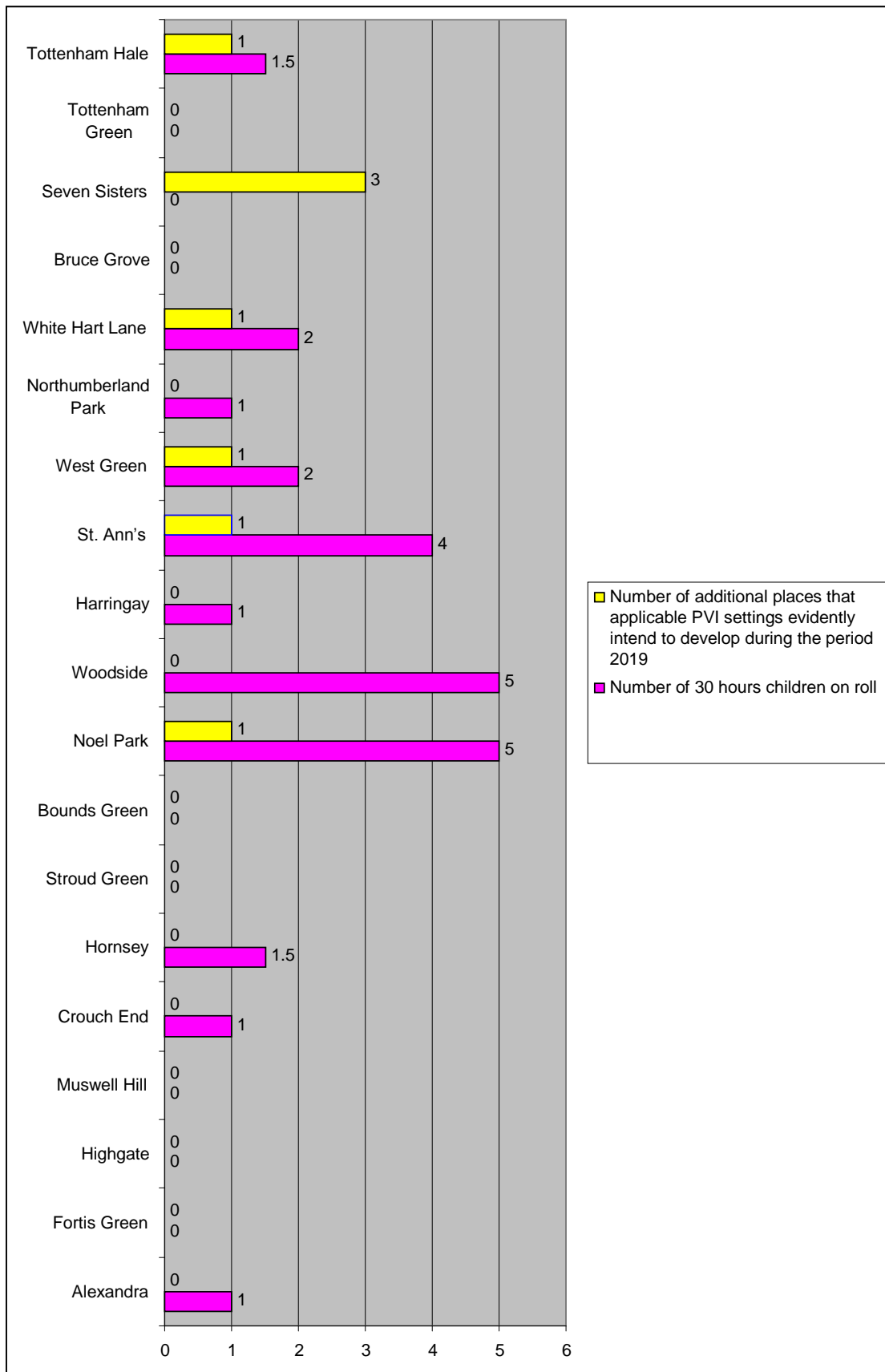


Diagram 21 - Incidence of take-up and potential future provision of 30 hours childcare offer places – as stated by responding registered childminders in 2019 that are located in each of the 19 wards



The three wards which accounted for the *highest* number of 3 and 4 year olds on roll, and occupying 30 hours childcare offer places within PVI settings in 2019 were: 1. Noel Park ward, which borders... 2. West Green ward, 3. Fortis Green ward.

All *responding* PVI settings that *offered* 30 hours childcare places were invited to state whether they had a set/definite number of such places in 2019. 11% stated that they did have a set/definite number of places that they offered – and 89% stated they did not.

- 2.3.2 All *responding* and applicable (a) early years childcare providers/settings and (b) registered childminders were invited to outline whether they had – in 2019 – any partnership arrangements with other childcare providers, which allowed/enabled parents to use their 30 hours with *more than one provider*.

10% of early years childcare providers/settings stated that they did have such partnership arrangements – and 90% evidently did not. Those early years childcare providers/settings who did evidently have a partnership arrangement in 2019 most frequently stated that this was with another day nursery, followed in frequency by being with a registered childminder.

The early years childcare providers/settings that had not evolved partnership arrangements aligned to the 30 hours childcare offer were asked whether they would be interested in developing such a partnership.

21% of applicable childcare providers stated: Yes, 26% stated: Maybe and 54% stated: No. The highest incidence of a statement of: Yes or: Maybe was observed in the Northumberland Park ward.

- 2.3.3 (Only) 6% of registered childminders stated that they did have partnership arrangements aligned to the 30 hours childcare offer – and 94% evidently did not. Those registered childminders that did evidently have a partnership arrangement in 2019 most frequently stated that this was with a PVI sector day nursery. (There were (only) 0 examples of a partnership arrangement existing between two responding childminders). The registered childminders who had not evolved partnership arrangements aligned to the 30 hours childcare offer were asked whether they would be interested in developing such a partnership. 23% stated: Yes (notably in the Fortis Green ward); 25% stated: Maybe and 52% stated: No.

- 2.3.4 All *responding* and applicable (a) early years childcare providers/settings – i.e. PVI settings and maintained nursery classes – and (b) registered childminders were requested to state whether they believed that
1. themselves and/or 2. their parents would continue to benefit from more information about the 30 hours childcare offer, including going in to 2019, the second year of *full* roll out...

Table 61 indicates the frequency with which the three types of early years childcare provider considered that they, themselves, would benefit from the receipt of information about specific features of the 30 hours childcare offer.

Table 61 - Frequency with which early years childcare provider considered that they would benefit from the receipt of information about a specific feature of the 30 hours childcare offer

Feature/element of the 30 hours childcare offer	Percentage of responding PVI settings stating <i>that they</i> would continue to benefit from (more) information about...	Percentage of responding maintained nursery classes stating <i>that they</i> would continue to benefit from (more) information about...	Percentage of responding registered childminders stating <i>that they</i> would continue to benefit from (more) information about...
Understanding the eligibility criteria	25%	3%	32%
Accessing or using the childcare provider portal	35%	10%	37%
Partnership arrangements between childcare providers	24%	5%	32%
Grace periods	32%	10%	35%
When to make extra charges	27%	15%	34%
None of the above	48%	75%	57%

Note: a number of respondents/childcare providers wished to provide multiple options.

Table 61 indicates that the most frequent feature/element of the 30 hours childcare offer that early years childcare providers/*settings* considered that they would (still) benefit from (more/continued) information about was: accessing or using the childcare provider portal, followed in frequency by (the dynamics of) grace periods.

The most frequent feature/element of the 30 hours childcare offer that registered childminders considered that they would (still) benefit from (more/continued) information about was: accessing or using the childcare provider portal, followed in frequency by: administration of grace periods.

Table 62 indicates the frequency with which the types of early years childcare provider considered that *their parent's* would benefit from the receipt of information about specific features/elements of the 30 hours childcare offer.

Table 62 - Frequency with which early years childcare providers/settings and registered childminders considered that their parents would benefit from the receipt of information about a specific feature of the 30 hours childcare offer

Feature/element of the 30 hours childcare offer	Percentage of responding PVI settings stating that <i>their parents</i> would continue to benefit from (more) information about...	Percentage of responding maintained nursery classes stating that <i>their parents</i> would continue to benefit from (more) information about...	Percentage of responding registered childminders stating that <i>their parents</i> would continue to benefit from (more) information about...
Understanding the eligibility criteria	54%	20%	43%
Accessing or using the government's eligibility checker	57%	23%	43%
Accessing or using the Haringey parent portal	65%	40%	43%
Reconfirming eligibility (every 3 months)	67%	55%	47%
Using more than one childcare provider/splitting the hours	41%	5%	37%
Grace periods	48%	18%	40%
Extra charges	46%	5%	40%
Other	6%	5%	2%
None of the above	24%	35%	57%

Note: respondents were able to state multiple options.

Table 62 indicates that the most frequent feature/element of the 30 hours childcare offer that early years childcare providers/settings – i.e. PVI settings and maintained nursery classes – considered that their parents would (still) benefit from (more/continued) information about was: reconfirming eligibility (every 3 months), followed in frequency by: accessing or using the Haringey parent portal.

The most frequent feature/element of the 30 hours childcare offer that registered childminders considered that their parents would (still) benefit from (more/continued) information about was also: reconfirming eligibility (every 3 months).

2.3.5 All *responding* and applicable (a) early years childcare providers/settings – i.e. PVI settings and maintained nursery classes – and (b) registered childminders were requested to outline what they believed (any) key challenges had been in terms of their implementation and delivery of the 30 hours childcare offer in its first year of full national roll-out, including across the London Borough of Haringey. They were also invited to describe any barriers to accessing the 30 hours childcare offer, which they believed that their parents and other local parents/families may have experienced. The most frequent statement was (words to the effect): *“The initial issuing of eligibility codes and the system of reconfirmation”*.

2.3.6 All *responding* and applicable (a) early years childcare providers/settings – i.e. PVI settings and maintained nursery classes – and (b) registered childminders who were not (yet) offering 30 hour childcare offer places in 2019 were requested to outline under what circumstances they would consider doing so:

- 6% of applicable early years childcare providers/settings stated: If we/I had the demand from parents
- 6% of applicable early years childcare providers/settings stated: If it helped our/my business
- 6% of applicable early years childcare providers/settings stated: If we were/I was confident it would not cause us/me any sustainability concerns
- 6% of applicable early years childcare providers/settings stated: If I were confident it would not add to our paperwork and administration tasks (indeed, only registered childminders provided this response)

Additionally,

- 34% of applicable registered childminders stated: If we/I had the demand from parents
- 23% of applicable registered childminders stated: If it helped our/my business
- 20% of applicable registered childminders stated: If we were/I was confident it would not cause us/me any sustainability concerns
- 18% of applicable registered childminders stated: If I were confident it would not add to our paperwork and administration tasks

A number of additional responses were provided, most frequently (words to the effect from representatives of PVI sector early years childcare providers/settings and especially a number of applicable childminders was) *“If the funding level was paid at a higher hourly rate”*.

Finally it can be noted that “Other” *repeated* responses provided by registered childminders were (words to the effect):

“I would only provide 30 hours childcare offer places if the parent was willing to make up my fee to its normal hourly rate”.

“I would only provide 30 hours childcare places if I really needed to fill my places”.

2.3.7 Additionally all responding and applicable (a) early years childcare providers/settings – i.e. PVI settings and maintained nursery classes – and (b) registered childminders who were not (yet) offering 30 hour childcare offer places (in 2019) were asked whether they believed that they would begin to provide 30 hours childcare places at some point in 2019.

- 0 applicable responding early years childcare providers/settings stated: Yes
- 6% of applicable responding early years childcare providers/settings stated: Maybe (and were most frequently operating in the northern vicinity of the borough)
- 81% of applicable responding early years childcare providers/settings stated: No
- 13% of applicable responding early years childcare providers/settings stated: Don't Know
- (Only) 2% of applicable responding registered childminders stated: Yes
- 13% of applicable responding registered childminders stated: Maybe (and were most frequently operating in the southern vicinity of the borough)
- 54% of applicable responding registered childminders stated: No
- 31% of applicable responding registered childminders stated: Don't Know

2.3.8 All *responding* out of school childcare providers were invited to state whether they were offering 30 hours childcare places at their setting in 2019.

Only one of responding after school clubs stated that they were offering the 30 hours childcare offer – and this setting was situated in the Northumberland Park ward.

None of the responding breakfast clubs stated that they were offering the 30 hours childcare offer and none of the responding holiday playschemes stated that they were offering the 30 hours childcare offer.

- 2.3.10 All *responding* out of school childcare providers were invited to state whether they had ever experienced demand for a 30 hours childcare offer place(s) or any enquiries, since its full roll-out in September 2017.

Only 2% of responding after school clubs stated that they had.

0 responding breakfast clubs and holiday playschemes stated that they had.

Additionally, all *responding* and applicable out of school childcare providers were invited to state under what circumstances would their setting consider providing 30 hours childcare offer places? Table 63 below outlines the responses aligned to the type of out of school childcare provider.

Table 63 - Circumstances under which out of school providers stated they would potentially consider organising 30 hours childcare offer place(s)

Circumstance	Out of School Childcare Provider Type		
	After School Club	Breakfast Club	Holiday Playscheme
If we had the demand from parents	13%	26%	0
If it helped our business	0	6%	0
If we were confident it would not cause sustainability concerns	3%	3%	0
If we were confident it would not add to our administration tasks	0	3%	0
Do not know enough about it to consider	23%	29%	11%
Other	61%	33%	89%

The response: if we had the demand from parents was most frequently stated by out of school childcare providers that are located in the Harringay and Noel Park wards.

The response 'Other' was most frequently (words to the effect) *"It will never be a factor because we do not take 3 – 4 year olds"*, followed in frequency by *"...If it was offered by our co-joined nursery we would consider it"*.

- 2.3.11 All *responding* out of school childcare providers were invited to state whether they envisaged that they might begin to provide 30 hours childcare places in autumn, spring or summer 2019 – 2020?

None of the representatives of the three types of out of school childcare settings stated: Yes – we do/will.

14% of responding breakfast clubs stated: Maybe and they were most frequently located in the Noel Park and the White Hart Lane wards.

- 2.3.12 In terms of the Providers Audit, all *responding* and applicable PVI settings were invited to state whether *they* were offering funded entitlement for 2 year olds places at their setting in 2019. 59% of such respondents stated that they were and 41% of such respondents stated that they were not.

Table 64 below indicates relevant responses aligned to the 19 wards.

Table 64 - Incidence of take-up and potential future provision of funded entitlement for 2 year olds places – as stated by responding early years PVI settings in 2019

Ward	Number of funded entitlement for 2 year olds <i>on roll</i> in 2019 stated by <i>responding</i> PVI settings	Number of <i>responding</i> early years childcare providers/ settings who stated that they intended to increase the number of funded 2 year old places they offer in 2019...	...Number of additional places that applicable PVI settings evidently intend to develop during the period 2019
Network Learning Community: Highgate/Muswell Hill			
Alexandra	6	0	0
Fortis Green	43	0	0
Highgate	0	0	0
Muswell Hill	22	0	0
Total NLC	71	0	0
Network Learning Community: Hornsey/Stroud Green			
Crouch End	0	0	0
Hornsey	11	0	0
Stroud Green	n/a	n/a	n/a
Total NLC	11	0	0
Network Learning Community: Wood Green			
Bounds Green	50	0	0
Noel Park	41	0	0
Woodside	38	0	0
Total NLC	129	0	0
Network Learning Community: Harringay/West Green			
Harringay	23	0	0
St. Ann's	45	0	0
West Green	44	1	4
Total NLC	112	1	4
Network Learning Community: North East Tottenham			
Northumberland Park	68	0	0
White Hart Lane	5	0	0
Total NLC	73	0	0
Network Learning Community: South East Tottenham			
Bruce Grove	23	1	3
Seven Sisters	29	0	0
Tottenham Green	21	0	0
Tottenham Hale	85	0	0
Total NLC	158	1	3

- 2.3.13 All *responding* PVI settings were invited to state whether they had a set/definite number of such places in 2019.
10% stated that they did have a set/definite number of places that they offered – and 90% stated that they did not.
- 2.3.14 All registered childminders were invited to state whether they were offering funded entitlement for 2 year olds places in 2019 as part of the Providers Audit. 55% of such respondents/individuals stated that they were and Table 65 below indicates relevant responses aligned to the 19 wards.

Table 65 - Incidence of take-up and potential future provision of funded entitlement for 2 year olds places – as stated by responding registered childminders in 2019

Ward	Number of funded entitlement for 2 year olds <i>on roll</i> in 2019 stated by <i>responding</i> registered childminders	Number of <i>responding</i> childminders who stated that they intended to increase the number of funded 2 year old places they offer in 2019...	...Number of additional places that applicable registered childminders evidently intend to develop during the period 2019
Network Learning Community: Highgate/Muswell Hill			
Alexandra	0	0	0
Fortis Green	0	0	0
Highgate	n/a	n/a	n/a
Muswell Hill	1	0	0
Total NLC	1	0	0
Network Learning Community: Hornsey/Stroud Green			
Crouch End	0	0	0
Hornsey	0	0	0
Stroud Green	0	0	0
Total NLC	0	0	0
Network Learning Community: Wood Green			
Bounds Green	0	0	0
Noel Park	0	0	0
Woodside	5	0	0
Total NLC	5	0	0
Network Learning Community: Harringay/West Green			
Harringay	0	0	0
St. Ann's	0	0	0
West Green	3	0	0
Total NLC	3	0	0
Network Learning Community: North East Tottenham			
Northumberland Park	0	0	0
White Hart Lane	0	0	0
Total NLC	0	0	0
Network Learning Community: South East Tottenham			
Bruce Grove	0	0	0
Seven Sisters	0	0	0
Tottenham Green	0	0	0
Tottenham Hale	1	0	0
Total NLC	1	0	0

Table 65 indicates that the two wards which accounted for the highest number of 2 year olds *on roll*, and occupying funded entitlement for 2 year olds places with registered childminders in 2019 were: West Green ward and Woodside ward.

- 2.3.15 All *responding* registered childminders that *provided* the funded entitlement for 2 year olds were invited to state whether they had a set/definite number of such places. 14% stated that they did have a set/definite number of places that they offered – and 86% stated that they did not.
- 2.3.16 All applicable (a) early years childcare providers/settings and (b) registered childminders were invited to state whether a particular statement about their intended forthcoming delivery of funded entitlement for 2 year old places applied to them/their provision.
- 15% of applicable early years childcare providers/settings stated:
Over the next 2 years we intend to increase the number of places that we offer to eligible 2 year olds – a response most frequently observed from applicable providers located in the Bruce Grove ward and the St. Ann's ward
 - 36% of applicable early years childcare providers/settings stated:
Over the next 2 years the number of places that we offer to eligible 2 year olds will remain the same as it is now
 - 6% of applicable early years childcare providers/settings stated:
Over the next 2 years we intend to reduce the number of places that we offer to eligible 2 year olds
 - 43% of applicable early years childcare providers/settings stated:
I do not know what the situation will be over the next 2 years in terms of the number of places we offer to eligible 2 year olds – Additionally,
 - 10% of applicable registered childminders stated:
Over the next 2 years we intend to increase the number of places that we offer to eligible 2 year olds – a response most frequently observed from applicable providers located in the Noel Park ward
 - 46% of applicable registered childminders stated:
Over the next 2 years the number of places that we offer to eligible 2 year olds will remain the same as it is now
 - 3% of applicable registered childminders stated:
Over the next 2 years we intend to reduce the number of places that we offer to eligible 2 year olds
 - 41% of applicable registered childminders stated:
I do not know what the situation will be over the next 2 years in terms of the number of places we offer to eligible 2 year olds

2.3.17 All *responding* early years childcare providers/settings – i.e. PVI settings and maintained nursery classes – were also invited to state whether they were offering universal 15 hours funded entitlement places for 3 and 4 year olds at their setting in 2019. 93% of such respondents stated that they were and 7% of such respondents stated that they were not. Table 66 and Table 67 below indicate relevant responses aligned to the 19 wards.

Table 66 - Incidence of take-up and potential future provision of universal 15 hours funded entitlement places for 3 and 4 year olds – as stated by responding PVI settings in 2019

Ward	Number of universal funded entitlement for 3&4 year olds <i>on roll</i> in 2019 stated by <i>responding</i> PVI settings	Number of <i>responding</i> PVI settings who stated that they intended to increase the number of universal funded entitlement for 3&4 year olds places they offer in 2019...	...Number of additional places that applicable PVI settings evidently intend to develop during the period 2019
Network Learning Community: Highgate/Muswell Hill			
Alexandra	75	0	0
Fortis Green	127	0	0
Highgate	13	0	0
Muswell Hill	118	0	0
Total NLC	333	0	0
Network Learning Community: Hornsey/Stroud Green			
Crouch End	51	0	0
Hornsey	19	0	0
Stroud Green	n/a	n/a	n/a
Total NLC	70	0	0
Network Learning Community: Wood Green			
Bounds Green	57	1	20
Noel Park	78	0	0
Woodside	44	0	0
Total NLC	179	1	20
Network Learning Community: Harringay/West Green			
Harringay	25	1	4
St. Ann's	54	0	0
West Green	66	1	4
Total NLC	145	2	8
Network Learning Community: North East Tottenham			
Northumberland Park	57	0	0
White Hart Lane	4	0	0
Total NLC	63	0	0
Network Learning Community: South East Tottenham			
Bruce Grove	25	1	3
Seven Sisters	16	0	0
Tottenham Green	37	0	0
Tottenham Hale	89	0	0
Total NLC	167	1	3

Table 67 - Incidence of take-up and potential future provision of universal 15 hours funded entitlement places for 3 and 4 year olds – as stated by responding maintained nursery classes in 2019

Ward	Number of universal funded entitlement for 3&4 year olds <i>on roll</i> in 2019 stated by <i>responding</i> maintained nursery classes	Number of <i>responding</i> maintained nursery classes that stated that they intended to increase the number of universal funded entitlement for 3&4 year olds places they offer in 2019...	...Number of additional places that applicable maintained nursery classes evidently intend to develop during the period 2019
Network Learning Community: Highgate/Muswell Hill			
Alexandra	30	0	0
Fortis Green	25	1	1
Highgate	75	1	0
Muswell Hill	n/a	n/a	n/a
Total NLC	130	2	1
Network Learning Community: Hornsey/Stroud Green			
Crouch End	25	1	5
Hornsey	114	1	4
Stroud Green	51	2	10
Total NLC	190	4	19
Network Learning Community: Wood Green			
Bounds Green	9	0	0
Noel Park	60	1	1
Woodside	30	0	0
Total NLC	99	1	1
Network Learning Community: Harringay/West Green			
Harringay	13	0	5
St. Ann's	98	5	58
West Green	88	0	0
Total NLC	199	5	63
Network Learning Community: North East Tottenham			
Northumberland Park	19	1	5
White Hart Lane	116	2	10
Total NLC	135	3	15
Network Learning Community: South East Tottenham			
Bruce Grove	9	1	10
Seven Sisters	48	2	13
Tottenham Green	31	1	5
Tottenham Hale	119	2	15
Total NLC	207	6	43

Table 66 and Table 67 indicate that the three wards which accounted for the highest number of such 3 and 4 year olds on roll, and occupying universal funded places within early years childcare sector settings in 2019 were (situated in the central vicinity and were): Fortis Green ward, Noel Park ward and Tottenham Hale ward.

- 2.3.18 All *responding* early years childcare providers/settings – i.e. PVI settings and maintained nursery classes – that *offered* universal 15 hours funded entitlement places for 3 and 4 year olds were invited to state whether they had a set/definite number of such places in 2019. 5% stated that they did have a set/definite number of places that they offered – and 95% stated that they did not.

- 2.3.19 All *responding* registered childminders were invited to state whether they were offering universal 15 hours funded entitlement places for 3 and 4 year olds in 2019. 56% of such individuals stated that they were.

Table 68 below indicates relevant responses aligned to the 19 wards...

Table 68 - Incidence of take-up and potential future provision of universal 15 hours funded entitlement places for 3 and 4 year olds – as stated by responding registered childminders in 2019

Ward	Number of universal funded entitlement for 3&4 year olds <i>on roll</i> in 2019 stated by <i>responding</i> registered childminders	Number of <i>responding</i> registered childminders who stated that they intended to increase the number of funded 15 hrs entitlement for 3&4 year olds places in 2019...	...Number of additional places that applicable registered childminders evidently intend to develop during the period 2019
Network Learning Community: Highgate/Muswell Hill			
Alexandra	2	0	0
Fortis Green	5	0	0
Highgate	n/a	n/a	n/a
Muswell Hill	0	0	0
Total NLC	7	0	0
Network Learning Community: Hornsey/Stroud Green			
Crouch End	0	0	0
Hornsey	0	0	0
Stroud Green	1	0	0
Total NLC	1	0	0
Network Learning Community: Wood Green			
Bounds Green	3	0	0
Noel Park	1	0	0
Woodside	1	0	0
Total NLC	5	0	0
Network Learning Community: Harringay/West Green			
Harringay	1	0	0
St. Ann's	1	1	1
West Green	3	0	0
Total NLC	5	1	1
Network Learning Community: North East Tottenham			
Northumberland Park	2	0	0
White Hart Lane	0	1	1
Total NLC	2	1	1
Network Learning Community: South East Tottenham			
Bruce Grove	1	0	0
Seven Sisters	0	1	3
Tottenham Green	1	0	0
Tottenham Hale	2	1	2
Total NLC	4	2	5

Table 68 indicates that the three wards which accounted for the highest number of such 3 and 4 year olds on roll, and occupying such funded entitlement places with registered childminders in 2019 were:

1. Fortis Green ward

2. West Green ward
3. Bounds Green ward

2.3.20 All *responding* registered childminders that *provided* the universal 15 hours funded entitlement places for 3 and 4 year olds were invited to state whether they had a definite number of such places. 15% stated that they did have a set number of places that they offered – and 85% stated that they did not.

2.5 Supply and children with SEND

2.5.1 All responding (a) early years childcare providers/settings – i.e. PVI settings and maintained nursery classes – and (b) registered childminders were asked what they considered were the key challenges that the early years childcare sector in the London Borough of Haringey (still) faces in terms of providing suitable and quality childcare for carers/parents and their children with SEND?

The most frequent response was (words to the effect): *“Difficulties in securing funding for additional SEND support”*.

The second most frequent response was (words to the effect, especially from registered childminders): *“Physical access issues – including for wheelchair using young children”*.

The third most frequent response was (words to the effect): *“Difficulties in finding settings where a professional/a childminder is appropriately trained”*.

The fourth most frequent response was (words to the effect): *“Attaining support from the local authority”*.

The fifth most frequent response was (words to the effect): *“A challenge of securing an early diagnosis”*.

2.5.2 All responding out of school childcare providers were asked what they considered were the key challenges that the out of school childcare sector in the London Borough of Haringey (still) faces in terms of providing suitable and quality childcare for carers/parents and their children with SEND?

The most frequent response was (words to the effect): *“Difficulties in securing funding for additional SEND support”*.

The second most frequent response was (words to the effect): *“Our staff training could ideally be enhanced”*.

The third most frequent response was (words to the effect): *“A need to ideally resource more 1-1 support”*.

The fourth most frequent response was (words to the effect): *“Attaining funding for more specialist equipment”*.

The fifth most frequent response was (words to the effect): *“A challenge of making carers actually aware that we can support SEN children”*.

2.6 Perceptions on future sustainability

- 2.6.1 All responding early years childcare providers/settings – i.e. PVI settings and maintained nursery classes – and registered childminders were requested to state/quantify how long they *expected* to (continue to) be providing childcare?

Diagram 31 - Length of time that early years childcare providers/settings and registered childminders anticipated their sustainability and operation would continue

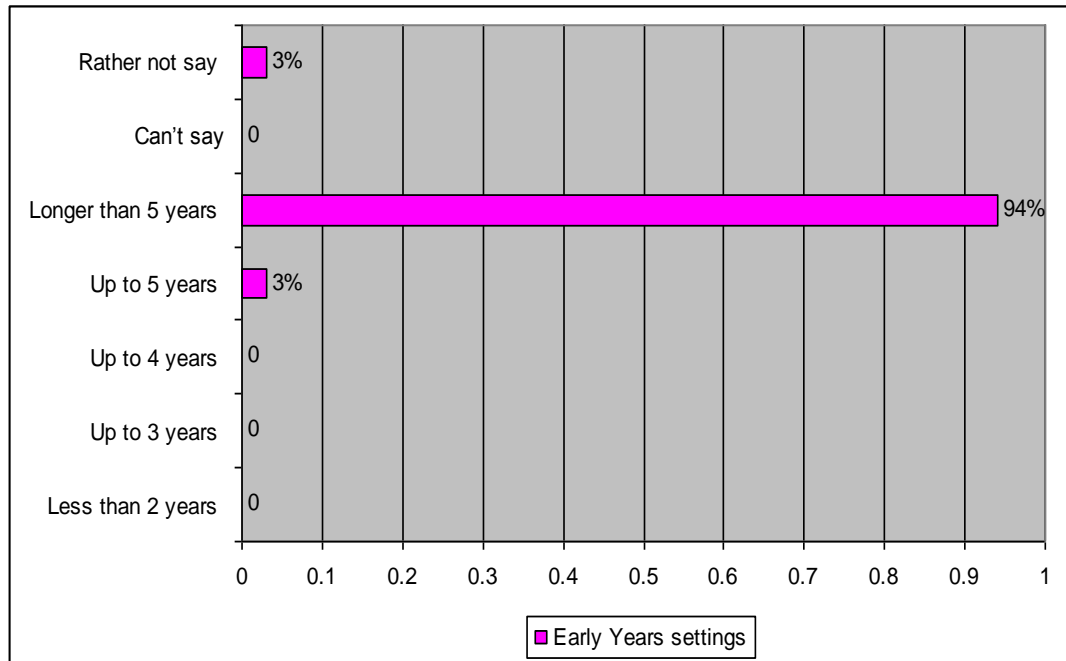
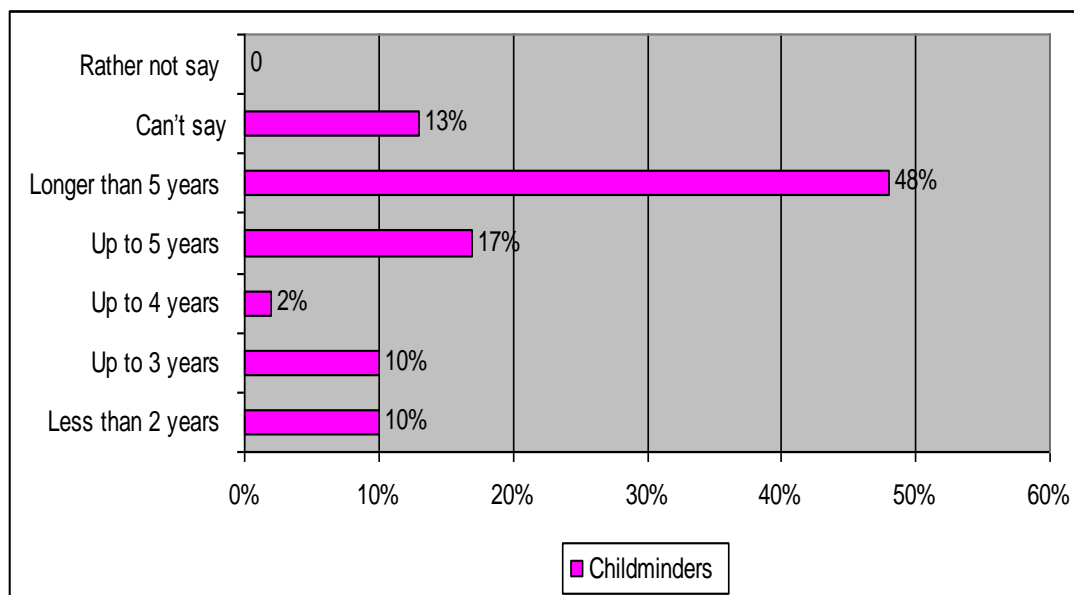


Diagram 32 - Length of time that early years childcare providers/settings and registered childminders anticipated their sustainability and operation would continue



2.6.2 Diagrams 31 and 32 indicates that the:

- London Borough of Haringey's PVI early years childcare settings and maintained nursery classes most frequently expected to be sustainable and operating for longer than 5 years
- London Borough of Haringey's registered childminders also most frequently also expected to be sustainable and operating for longer than 5 years – however 1 : 5 stated that they did not expect to be operating past late 2021 – and these childminders were most frequently operating in the western vicinity of the borough

2.6.3 All responding out of school childcare providers were requested to state/quantify how long they *expected* to (continue to) be providing childcare?

Table 69 - Length of time that out of school childcare providers anticipated their sustainability and operation would continue

Length of time	After School Clubs	Breakfast Clubs	Holiday Playschemes
Less than 2 years	0	0	0
Up to 3 years	0	0	0
Up to 4 years	0	0	0
Up to 5 years	0	0	0
Longer than 5 years	93%	97%	100%
Can't say	7%	3%	0

2.6.4 Table 69 indicates that all of the out of school childcare settings had a very positive outlook aligned to ongoing sustainability.

2.7 Perceptions on beneficial forms of support

- 2.7.1 Table 70 indicates the extent to which early years childcare providers – i.e. PVI settings and maintained nursery classes – and registered childminders stated that they felt their provision would benefit from specific types of support – potentially via the local authority Table 70 - Extent to which early years childcare providers and registered childminders stated that they felt their provision would benefit from specific/targeted types of support

Type of Support	Early Years Childcare Settings	Registered Childminders
Recruitment and Retention	29%	6%
Training	18%	14%
Marketing support/advice	21%	16%
(Continued ¹⁴) Business support/advice	21%	17%
Building alterations	13%	8%
Inspection/registration support/advice	6%	10%
Support to network with other providers/childminders	9%	10%
Support with setting up an After school club	4%	7%
Support with setting up a Breakfast club	4%	8%
Support with setting up a Holiday playscheme	4%	6%
Advice/support on needs of Children with special needs	19%	20%
Advice/support on providing childcare for complex medical needs	17%	21%

- 2.7.2 Table 70 indicates that the three most frequent forms of specific/targeted support requested by (responding) members of the London Borough of Haringey's early years childcare providers/settings were (in order of frequency):

1. Recruitment and retention
2. Marketing advice/support
3. (Continued) business support/advice

The three most frequent forms of specific/targeted support requested by (responding) members of the London Borough of Haringey's childminding sector were (in order of frequency):

1. Advice/support on providing childcare for complex medical needs
2. Advice/support on needs of children with special needs

¹⁴ To complement the research outlined in this report, the London Borough of Haringey commissioned a period of business modeling and sustainable support which (also) was undertaken in late 2018 – early 2019. That project was also undertaken by Premier Advisory Group and led by the organisation's Associate Director for Early Years Business Support.

3. (Continued) business support/advice

- 2.7.3 Table 80 indicates the extent to which out of school childcare providers stated that they felt their provision would benefit from specific types of support – potentially via the local authority

Table 80 - Extent to which out of school childcare providers stated that they felt their provision would benefit from specific/targeted types of support

Type of Support	After School Clubs	Breakfast Clubs	Holiday Playschemes
Recruitment and Retention	3%	3%	0
Training	43%	11%	56%
Marketing support/advice	20%	14%	22%
Business support/advice	28%	17%	33%
Building alterations	18%	11%	11%
Inspection/registration support/advice	18%	6%	33%
Support to network with other providers	23%	9%	33%
Support with setting up a Breakfast club	5%	3%	0
Support with setting up a Holiday playscheme	8%	0	0
Advice/support on needs of Children with special needs	33%	3%	44%
Advice/support on providing childcare for complex medical needs	28%	3%	33%

- 2.7.4 Table 80 indicates that the three most frequent forms of specific/targeted support requested by (responding) members of the London Borough of Haringey's out of school childcare providers/settings were (in order of frequency):

1. Staff training
2. Business support/advice
3. Advice/support on needs of children with special needs

4 30 hours childcare-themed – Gaps Analysis

The following narrative presents some potential priorities which sufficiency planners within the London Borough of Haringey could consider during the third full year of roll out of the 30 hours childcare offer, including aligned to an over-riding ambition for the borough to enhance social mobility.

The 30 hours childcare offer has evidently had an impact on the London Borough of Haringey's early years childcare market since its inception in September 2017, particularly in terms of an increase in the take-up of 3 year olds and providers filling their vacant places. Effectively, the early years childcare market has (re)balanced between funded childcare offers – and will continue to do so during the period 2019 – 2021.

The affect on social mobility been positive however, with more families benefitting from funded childcare provision. However, it is arguable that more work is needed to ensure that families take up the entitlements, especially in areas where there are high populations of children and low take up.

The 2019 Childcare Sufficiency Assessment has demonstrated how social mobility is being enhanced in the borough as an outcome of positive attributes of its early years and childcare market/sector. For example, through consulting with parents it became clear that:

- The parents of 3 and 4 year olds *who were* accessing the 30 hours childcare offer, were invited to state whether they considered that the 30 hours childcare offer was helping them and/or a partner to remain in work or to take up employment – and:
 - 79% of applicable parents stated: Yes, it has helped me and/or a partner to remain in employment/self-employment/a job
 - 5% of applicable parents stated: Yes, it has helped me and/or a partner to take up a part-time job/part-time self-employment.
 - 5% of applicable parents stated: Yes, it has helped me and/or a partner to take up a full-time job/full-time self-employment.
 - 11% of the applicable parents stated that their (working) circumstance(s) had not been in anyway affected by the childcare offer
- The most frequent reason stated for using formal childcare was: so that I can go to work or study (69% of applicable parents)
- Indeed approximately 1 : 2 of the responding parents stated that they were *currently* in a type of paid employment – i.e. they were working parents – and that in the majority of cases this was made possible by them using formal childcare, including in a large number of cases one of the three funded entitlement
- Over half of formal childcare using parents had never experienced in any barriers to do doing so

Finally, from a contextual perspective, it should also be noted that a number of the Gaps presented below are geographical themed potential *forthcoming* priorities, which have been informed by the outcomes of the 2019 Childcare Sufficiency Assessment.

Potential Emerging Gap 1: The Seven Sisters ward accounts for a relatively high number of resident 2, 3 and 4 year olds, plus a relatively high ongoing birth rate.

As part of the overall Tottenham Regeneration initiatives the High Road West project will continue to generate the establishment of (c1,200) new dwellings in forthcoming years in the Seven Sisters ward.

Potential Action: Childcare sufficiency planners within the London Borough of Haringey should prioritise monitoring the ongoing availability of 30 hours childcare offer places in the Seven Sisters ward – and potentially instigate action(s) to further stimulate the delivery of funded early years provision within that wider South West Network Learning Community, including the wards of Bounds Green, Tottenham Hale and Tottenham Green wards (where the population of young children is increasing), aligned to the ongoing incidence of (any) vacant places.

Potential Emerging Gap 2: Two wards which evidently account for a relatively low number of ‘30 hours childcare children’ on roll in 2019 are (the relatively deprived, including in terms of historically high unemployment levels, like the Seven Sisters ward above) Northumberland Park ward. However both wards account for a relatively high number of resident 3 – 4 year olds, plus 2 year olds.

Potential Action: Childcare sufficiency planners within the London Borough of Haringey should prioritise monitoring the actual availability of 30 hours childcare offer places in both wards – and potentially instigate action(s) to (further) stimulate the delivery of such funded provision within the two localities, if demand becomes more pronounced.

Indeed an important intervention of childcare sufficiency planners will be to (continue to) stabilize the childcare market within such relatively deprived wards, including in light of the reduction of the hourly funding rate of the free entitlement for 2 year olds, which is set to be implemented across the borough in September 2019. Part of this stabilization will be achieved through the provision, by the London Borough of Haringey, of structured business support to early years childcare settings to highlight areas of risk in provider viability and sufficiency of childcare places.

Potential Emerging Gap 3: The population of 2, 3 and 4 year olds continues to be relatively high in the Tottenham Green ward and the Tottenham Hale ward. This is an area which is set to account for a pronounced incidence of new housing developments, and thus it can be reasonably assumed a growing population of resident 2 – 4 year olds – including via the Mayor’s Housing Zone initiative/the Hale Village site.

Potential Action: Those responsible for childcare sufficiency planning within the borough need to retain an awareness that pressure for future funded early years childcare will – with a high probability – be focused on the eastern/Tottenham vicinity. Ongoing structured business modeling support, offered to/accessible to the vicinity’s early years childcare sector would continue to encourage/enable more 30 hours childcare places, including through such further support offered to that locality’s childminders.

Those responsible for childcare sufficiency planning within the borough should consider working with those LA colleagues who have an involvement in the Hale Village development and its (new dwellings) phasing.

Potential Emerging Gap 4: A relatively high number of new dwellings are set to be constructed and eventually occupied in the Northumberland Park ward, situated in the north east of the borough. This ward also (already) accounts for a relatively high number of resident 2, 3 and 4 year olds, high levels of deprivation and unemployment, and a relatively low number of PVI sector early years childcare providers/settings.

Potential Action: (As with emerging Gap 1) childcare sufficiency planners within the London Borough of Haringey should prioritise monitoring the actual availability of the free entitlement for 2 year olds places in the (relatively deprived) Northumberland Park ward – and potentially instigate action(s) to (further) stimulate the delivery of early years childcare provision within that locality. These actions could include focused early years and childcare development work – through start-up stimulation – in the Northumberland Park ward, including in partnership with the local (voices of and advocates of the) community.

Potential Emerging Gap 5: All responding (to the Providers Audit) providers/settings and registered childminders who were evidently not yet offering 30 hour childcare offer places in 2019 were asked whether they envisaged that they would begin to provide 30 hours childcare places at some point in 2019. 0 early years childcare providers/settings stated that they did and only 2% of registered childminders stated that they did. However, 6% of early years childcare providers/settings stated: Maybe – as did 13% of registered childminders.

Potential Action: Childcare sufficiency planners within the London Borough of Haringey could focus on converting those Maybes into more tangible intentions - particularly in areas of high deprivation, such as the Northumberland Park ward, including in order to help meet increasing demand for 30 hours childcare offer places throughout the borough.

Potential Emerging Gap 6: The 2018 Haringey School Places Planning Report stated that the number of children and young people with a statement that were resident in the borough is on *an overall upward trajectory*. However, there was 0 examples of responding childminders – via the 2019 Providers Audit – stating that, in 2019, they had a 2 – 4 year old *with SEND* who was occupying a funded place. More encouragingly, two-thirds of responding early years childcare providers/settings stated that at least one child with SEND was occupying a funded childcare place at their setting.

Potential Action: Childcare sufficiency planners and SEND professionals/officers within the London Borough of Haringey, as part of a drive to further promote the ability of local childminders to provide funded childcare places, could work in partnership to ensure that a certain number are also equipped to effectively care for such 2 – 4 year olds with SEND, with a particular focus on the relatively deprived wards of the borough, such as Northumberland Park, Seven Sisters, Tottenham Hale and Tottenham Green.

Potential Emerging Gap 7: A number of registered childminders have expressed their concerns that parents are not as aware *as ideally they could be* that they can also viably deliver the 30 hours childcare offer. The childminders who attended a focus group session in early 2019 and which was targeted at their profession concurred that the local authority and its services could best help by promoting a message to local young parents that the 30 hours childcare offer can be accessed via registered childminders as well as the local daycare sector. It was also observed how certain childminders acknowledged that (in the words of one of their number) “...we are not as proactive in marketing as nurseries are”.

Potential Action: Childcare sufficiency and business planners within the London Borough of Haringey should prioritise their ongoing (strategic) work to raise and maintain the profile of the local childminding sector as a source of funded childcare support.

Potential Emerging Gap 8: A number of responding early years childcare providers/settings considered a priority for the London Borough of Haringey to be offering more support which would help them to address the challenge of (concisely and accurately) describing eligibility and the processes involved with accessing the entitlements offer to their growing numbers of EAL parents and families.

Potential Action: The London Borough of Haringey should continue its dedicated outreach work which supports EAL families, including via the role that its Children's Centres have to support BME and EAL communities.

Potential Emerging Gap 9: As part of the Providers Audit all (a) early years childcare providers/settings and (b) registered childminders were asked: *How would a reduction in the 2 year old free entitlement affect your ability to provide such provision?*

79% of applicable PVI settings stated: we might have to reduce the number of places we offer – and were most frequently located in the Highgate/Muswell Hill Network Learning Community. 100% of applicable maintained nursery classes/nursery schools stated: we might have to reduce the number of places we offer.

61% of applicable registered childminders stated: we might have to reduce the number of places we offer – and were most frequently located in the southern vicinity of the borough.

Potential Action: The London Borough of Haringey should continue to monitor the ongoing number of eligible 2 year olds in wards such as the relatively densely populated Seven Sisters ward in order to evaluate the extent to which any changes to the hourly funding rate for the free entitlement for 2 year olds may affect the availability of such (funded) support/provision.

Potential Emerging Gap 10: As an outcome of the Providers Audit, 6% of applicable early years childcare providers/settings stated that over the next 2 years they intend to reduce the number of funded places that they offer to eligible 2 year olds – and 3% of applicable registered childminders stated likewise

Potential Action: The London Borough of Haringey should work in partnership with those early years childcare providers who – as an outcome of the 2019 Providers Audit – stated that they intended to *increase* the number of free entitlement for 2 year olds places during 2019 – 2021, in order to offset potential reductions by other applicable providers.

Potential Emerging Gap 11: Approximately 1 : 5 of all responding early years childcare providers/settings *did not anecdotally feel* that there were sufficient childcare places *in their immediate geographical area* for children aged *under 2 years* – a response which was most frequently given by such providers that were situated within the western locality of the borough. Additionally a trend which a number of responding early years childcare providers/settings fed back was that they had been in receipt of more “*enquiries*” for places for babies in recent years.

Potential Action: Those responsible for childcare sufficiency planning within the London Borough of Haringey should continue to monitor demand for childcare places for under 2 year olds and where/when evidently required work in partnership with local early years childcare

providers to encourage/incentivize the establishment of further such places, including aligned to the fact that parents of 2 year olds that are eligible for the entitlement continue to view it as a valued form of support.

Potential Emerging Gap 12: An outcome of focus group sessions with early years childcare providers/settings in 2019 was a belief that Haringey-based employers were not invested in, or aware of, the 30 hours childcare offer as ideally they could be.

Potential Action: Childcare sufficiency and business planners within the London Borough of Haringey could prioritise further promoting and raising the profile of the 30 hours with local employers including via their HR representatives.

Potential Emerging Gap 13: London Borough of Haringey early years childcare providers/settings most frequently expected demand to be Higher – But not Significantly in 2020 – 2021. One-third of the early years childcare providers/settings that stated an answer of *Significantly Higher*, by that time, were located in the Tottenham Hale ward

Potential Action: Childcare sufficiency planners within the London Borough of Haringey could consider this finding aligned to Gap 3, which proposed that those responsible for childcare sufficiency planning within the borough need to retain an awareness that pressure for future funded early years childcare will – with a high probability – be focused on the Tottenham Hale and Tottenham Green wards linked to building developments.

Potential Emerging Gap 14: The London Borough of Haringey out of school childcare providers/settings most frequently expect demand to be higher in 2021. The Tottenham Hale, Tottenham Green, Seven Sisters and Bounds Green wards accounted for the highest frequency of the response(s): Significantly Higher or Higher – but Not Significantly. The same wards also account for the highest resident population for 5 – 14 year olds, at levels that are indeed rising.

Additionally, parents were invited to state whether they intended to use any formal childcare in the next two years, which they were not, in 2019, currently accessing. In terms of out of school childcare, an after school club was stated by 1 : 4 of applicable parents who were most frequently resident in the Tottenham Hale, Tottenham Green, Seven Sisters and Bounds Green wards.

Potential Action: Childcare sufficiency planners need to retain an awareness that pressure for future out of school childcare will – with a high probability – be focused on the Tottenham Hale, Tottenham Green, Seven Sisters and Bounds Green wards and may need to again respond by initiating approaches to stimulate the market, including the establishment of new provisions, especially for the school holiday periods.

Potential Emerging Gap 15: The 2018 Haringey School Places Planning Report outlined how the number of children and young people with SEND that were resident in the borough is on *an overall upward trajectory*. Additionally, the Haringey Needs Assessment for children with SEND has concluded that the highest prevalence rates in terms of all children and young people with SEND were observed in the Seven Sisters ward in the eastern vicinity of the borough.

Potential Action: Though early years and childcare providers fed back their willingness and ability to provide provision for children with SEND, the increase in numbers needs to be factored in to planning by the London Borough of Haringey, including in terms of the

(a) accessibility to funded childcare places; (b) the relevant training need(s) of early years and childcare professionals; (c) the further promotion of the existence of the Disability Access Fund.

Appendices

Appendix 1 - Fundamental supply and quality of childcare in early 2019 aligned to (a) ward and (b) Network Learning Community

The Tables below present three key indicators – by type of childcare provider – firstly aligned to the six Network Learning Community and then the 19 wards:

1. Number of childcare providers by ward
2. Total Number of places in the ward
3. Percentage of childcare providers with a Good or Outstanding Ofsted

Table 81 - Supply and quality in early 2019 observed in the Alexandra ward

Type of Provider	Number of providers in Ward	Total number of places in Ward	% with Met, Good or Outstanding Ofsted
PVI Day Nursery	2	112	100%
Maintained Nursery Class	2	104	100%
Pre-School Playgroup	3	58	100%
Maintained Nursery School	0	0	n/a
Children's Centre Day Nursery	0	0	n/a
Registered Childminder	9	50	88% 1 = No Ofsted yet
After School Club	1	30	1 = No Ofsted yet
Before/ Breakfast Club	0	0	n/a
Holiday Playscheme	0	0	n/a

Table 82 - Supply and quality in early 2019 observed in the Fortis Green ward

Type of Provider	Number of providers in Ward	Total number of places in Ward	% with Met, Good or Outstanding Ofsted
PVI Day Nursery	5	265	80% 1 = No Ofsted yet
Maintained Nursery Class	3	119	100%
Pre-School Playgroup	4	104	100%
Maintained Nursery School	0	0	n/a
Children's Centre Day Nursery	0	0	n/a
Registered Childminder	8	73	88% 1 = No Ofsted yet
After School Club	5	207	40% 1 = No Ofsted yet
Before/ Breakfast Club	2	75	100%
Holiday Playscheme	2	50	50% 1 = No Ofsted yet

Table 83 - Supply and quality in early 2019 observed in the Highgate ward

Type of Provider	Number of providers in Ward	Total number of places in Ward	% with Met, Good or Outstanding Ofsted
PVI Day Nursery	2	86	100%
Maintained Nursery Class	2	78	100%
Pre-School Playgroup	0	0	n/a
Maintained Nursery School	0	0	n/a
Children's Centre Day Nursery	0	0	n/a
Registered Childminder	1	6	100%
After School Club	2	44	2 = No Ofsted yet
Before/ Breakfast Club	2	70	100%
Holiday Playscheme	0	0	n/a

Table 84 - Supply and quality in early 2019 observed in the Muswell Hill ward

Type of Provider	Number of providers in Ward	Total number of places in Ward	% with Met, Good or Outstanding Ofsted
PVI Day Nursery	8	281	87.5%
Maintained Nursery Class	0	0	n/a
Pre-School Playgroup	0	0	n/a
Maintained Nursery School	0	0	n/a
Children's Centre Day Nursery	0	0	n/a
Registered Childminder	5	45	80% 1 = No Ofsted yet
After School Club	1	25	1 = No Ofsted yet
Before/ Breakfast Club	1	30	100%
Holiday Playscheme	0	0	n/a

Table 85 - Supply and quality in early 2019 observed in the Crouch End ward

Type of Provider	Number of providers in Ward	Total number of places in Ward	% with Met, Good or Outstanding Ofsted
PVI Day Nursery	6	377	100%
Maintained Nursery Class	1	64	100%
Pre-School Playgroup	0	0	n/a
Maintained Nursery School	0	0	n/a
Children's Centre Day Nursery	0	0	n/a
Registered Childminder	9	55	88% 1 = No Ofsted yet
After School Club	3	69	66% 1 = No Ofsted yet
Before/ Breakfast Club	2	52	100%
Holiday Playscheme	1	15	1 = No Ofsted yet

Table 86 - Supply and quality in early 2019 observed in the Hornsey ward

Type of Provider	Number of providers in Ward	Total number of places in Ward	% with Met, Good or Outstanding Ofsted
PVI Day Nursery	2	76	100%
Maintained Nursery Class	3	141	100%
Pre-School Playgroup	0	0	n/a
Maintained Nursery School	0	0	n/a
Children's Centre Day Nursery	0	0	n/a
Registered Childminder	8	44	62.5%
After School Club	3	130	100%
Before/ Breakfast Club	2	75	100%
Holiday Playscheme	1	50	1 = No Ofsted yet

Table 87 - Supply and quality in early 2019 observed in the Stroud Green ward

Type of Provider	Number of providers in Ward	Total number of places in Ward	% with Met, Good or Outstanding Ofsted
PVI Day Nursery	1	25	100%
Maintained Nursery Class	3	203	100%
Pre-School Playgroup	0	0	n/a
Maintained Nursery School	0	0	n/a
Children's Centre Day Nursery	0	0	n/a
Registered Childminder	7	41	88% 1 = No Ofsted yet
After School Club	n/a	n/a	n/a
Before/ Breakfast Club	n/a	n/a	n/a
Holiday Playscheme	n/a	n/a	n/a

Table 88 - Supply and quality in early 2019 observed in the Bounds Green ward

Type of Provider	Number of providers in Ward	Total number of places in Ward	% with Met, Good or Outstanding Ofsted
PVI Day Nursery	5	198	100%
Maintained Nursery Class	2	91	100%
Pre-School Playgroup	1	18	100%
Maintained Nursery School	0	0	n/a
Children's Centre Day Nursery	0	0	n/a
Registered Childminder	7	53	75%
After School Club	1	28	100%
Before/ Breakfast Club	1	28	100%
Holiday Playscheme	0	0	n/a

Table 89 - Supply and quality in early 2019 observed in the Noel Park ward

Type of Provider	Number of providers in Ward	Total number of places in Ward	% with Met, Good or Outstanding Ofsted
PVI Day Nursery	6	318	100%
Maintained Nursery Class	1	62	100%
Pre-School Playgroup	0	0	n/a
Maintained Nursery School	0	0	n/a
Children's Centre Day Nursery	0	0	n/a
Registered Childminder	12	71	92%
After School Club	3	137	33% 2 = No Ofsted yet
Before/ Breakfast Club	1	37	100%
Holiday Playscheme	0	0	n/a

Table 90 - Supply and quality in early 2019 observed in the Woodside ward

Type of Provider	Number of providers in Ward	Total number of places in Ward	% with Met, Good or Outstanding Ofsted
PVI Day Nursery	3	160	66% 1 = No Ofsted yet
Maintained Nursery Class	4	248	100%
Pre-School Playgroup	0	0	n/a
Maintained Nursery School	0	0	n/a
Children's Centre Day Nursery	1	73	Satisfactory
Registered Childminder	8	49	87% 1 = No Ofsted yet
After School Club	1	35	100%
Before/ Breakfast Club	2	105	100%
Holiday Playscheme	0	0	n/a

Table 91 - Supply and quality in early 2019 observed in the Harringay ward

Type of Provider	Number of providers in Ward	Total number of places in Ward	% with Met, Good or Outstanding Ofsted
PVI Day Nursery	5	209	100%
Maintained Nursery Class	2	100	100%
Pre-School Playgroup	1	20	100%
Maintained Nursery School	0	0	n/a
Children's Centre Day Nursery	0	0	n/a
Registered Childminder	14	84	93%
After School Club	2	50	50% 1 = No Ofsted yet
Before/ Breakfast Club	2	75	100%
Holiday Playscheme	0	0	0

Table 92 - Supply and quality in early 2019 observed in the St. Ann's ward

Type of Provider	Number of providers in Ward	Total number of places in Ward	% with Met, Good or Outstanding Ofsted
PVI Day Nursery	2	54	50% 1 = No Ofsted yet
Maintained Nursery Class	6	330	100%
Pre-School Playgroup	1	28	100%
Maintained Nursery School	1	135	100%
Children's Centre Day Nursery	0	0	n/a
Registered Childminder	8	57	89%
After School Club	2	163	50% 1 = No Ofsted yet
Before/ Breakfast Club	3	67	100%
Holiday Playscheme	0	0	0

Table 93 - Supply and quality in early 2019 observed in the West Green ward

Type of Provider	Number of providers in Ward	Total number of places in Ward	% with Met, Good or Outstanding Ofsted
PVI Day Nursery	4	172	75% 1 = No Ofsted yet
Maintained Nursery Class	3	184	100%
Pre-School Playgroup	1	24	0 1 = No Ofsted yet
Maintained Nursery School	0	0	n/a
Children's Centre Day Nursery	1	100	100%
Registered Childminder	14	81	75% 1 = No Ofsted yet
After School Club	1	40	50% 1 = No Ofsted yet
Before/ Breakfast Club	3	204	100%
Holiday Playscheme	0	0	0

Table 94 - Supply and quality in early 2019 observed in the Northumberland Park ward

Type of Provider	Number of providers in Ward	Total number of places in Ward	% with Met, Good or Outstanding Ofsted
PVI Day Nursery	1	35	100%
Maintained Nursery Class	5	332	100%
Pre-School Playgroup	1	30	100%
Maintained Nursery School	0	0	n/a
Children's Centre Day Nursery	1	60	100%
Registered Childminder	7	47	100%
After School Club	6	142	66% 1 = No Ofsted yet
Before/ Breakfast Club	3	75	66% 1 = No Ofsted yet
Holiday Playscheme	2	115	0 1 = No Ofsted yet

Table 95 - Supply and quality in early 2019 observed in the White Hart Lane ward

Type of Provider	Number of providers in Ward	Total number of places in Ward	% with Met, Good or Outstanding Ofsted
PVI Day Nursery	3	131	33% 1 = No Ofsted yet
Maintained Nursery Class	2	125	100%
Pre-School Playgroup	0	0	n/a
Maintained Nursery School	1	142	100%
Children's Centre Day Nursery	0	0	n/a
Registered Childminder	13	67	100%
After School Club	3	104	33% 2 = No Ofsted yet
Before/ Breakfast Club	2	114	100%
Holiday Playscheme	0	0	0

Table 96 - Supply and quality in early 2019 observed in the Bruce Grove ward

Type of Provider	Number of providers in Ward	Total number of places in Ward	% with Met, Good or Outstanding Ofsted
PVI Day Nursery	2	96	100%
Maintained Nursery Class	1	52	100%
Pre-School Playgroup	0	0	n/a
Maintained Nursery School	0	0	n/a
Children's Centre Day Nursery	0	0	n/a
Registered Childminder	11	68	64% 3 = No Ofsted yet
After School Club	2	60	100%
Before/ Breakfast Club	1	30	100%
Holiday Playscheme	0	0	0

Table 97 - Supply and quality in early 2019 observed in the Seven Sisters ward

Type of Provider	Number of providers in Ward	Total number of places in Ward	% with Met, Good or Outstanding Ofsted
PVI Day Nursery	0	0	n/a
Maintained Nursery Class	4	195	75%
Pre-School Playgroup	0	0	n/a
Maintained Nursery School	0	0	n/a
Triangle Children, Young People and Community Centre	1	147	100%
Registered Childminder	9	149	75% 1 = No Ofsted yet
After School Club	5	135	66% 2 = No Ofsted yet
Before/ Breakfast Club	3	101	66%
Holiday Playscheme	1	15	100%

Table 98 - Supply and quality in early 2019 observed in the Tottenham Green ward

Type of Provider	Number of providers in Ward	Total number of places in Ward	% with Met, Good or Outstanding Ofsted
PVI Day Nursery	2	95	50%
Maintained Nursery Class	2	256	100%
Pre-School Playgroup	1	17	100%
Maintained Nursery School	0	0	n/a
Children's Centre Day Nursery	0	0	n/a
Registered Childminder	10	59	75% 2 = No Ofsted yet
After School Club	2	66	100%
Before/ Breakfast Club	2	80	100%
Holiday Playscheme	1	36	1 = No Ofsted yet

Table 99 - Supply and quality in early 2019 observed in the Tottenham Hale ward

Type of Provider	Number of providers in Ward	Total number of places in Ward	% with Met, Good or Outstanding Ofsted
PVI Day Nursery	3	156	33% 2 = No Ofsted yet
Maintained Nursery Class	3	156	100%
Pre-School Playgroup	1	28	100%
Maintained Nursery School	1	184	100%
Children's Centre Day Nursery	0	0	n/a
Registered Childminder	13	73	53% 2 = No Ofsted yet
After School Club	1	22	0
Before/ Breakfast Club	4	154	100%
Holiday Playscheme	1	30	100%

Table 100 - Supply and quality in early 2019 observed in the Highgate/Muswell Hill Network Learning Community

Type of Provider	Number of providers in NLC	Total number of places in NLC	% with Met, Good or Outstanding Ofsted
PVI Day Nursery	16	689	82% 1 = No Ofsted yet
Maintained Nursery Class	7	301	100%
Pre-School Playgroup	7	162	100%
Maintained Nursery School	0	0	n/a
Children's Centre (LA) Day Nursery	1	55	n/a
Registered Childminder	26	198	73% 1 = No Ofsted yet
After School Club	8	276	30% 6 = No Ofsted yet
Before/ Breakfast Club	5	175	100%
Holiday Playscheme	2	49	50% 1 = No Ofsted yet

Table 101 - Supply and quality in early 2019 observed in the Hornsey/Stroud Green Network Learning Community

Type of Provider	Number of providers in NLC	Total number of places in NLC	% with Met, Good or Outstanding Ofsted
PVI Day Nursery	9	478	100%
Maintained Nursery Class	7	408	100%
Pre-School Playgroup	0	0	n/a
Maintained Nursery School	0	0	n/a
Children's Centre Day Nursery	0	0	n/a
Registered Childminder	24	140	75%
After School Club	6	199	83% 1 = No Ofsted yet
Before/ Breakfast Club	4	127	100%
Holiday Playscheme	2	65	2 = No Ofsted yet

Table 102 - Supply and quality in early 2019 observed in the Wood Green Network Learning Community

Type of Provider	Number of providers in NLC	Total number of places in NLC	% with Met, Good or Outstanding Ofsted
PVI Day Nursery	11	516	100%
Maintained Nursery Class	7	401	100%
Pre-School Playgroup	1	18	100%
Maintained Nursery School	0	0	n/a
Children's Centre Day Nursery	1	73	0
Registered Childminder	16	102	73% 1 = No Ofsted yet
After School Club	5	200	60% 2 = No Ofsted yet
Before/ Breakfast Club	4	170	100%
Holiday Playscheme	n/a	n/a	n/a

Table 103 - Supply and quality in early 2019 observed in the North East Tottenham Network Learning Community

Type of Provider	Number of providers in NLC	Total number of places in NLC	% with Met, Good or Outstanding Ofsted
PVI Day Nursery	4	166	50% 1 = No Ofsted yet
Maintained Nursery Class	7	447	100%
Pre-School Playgroup	1	30	100%
Maintained Nursery School	1	142	100%
Children's Centre Day Nursery	1	60	100%
Registered Childminder	20	114	95% 1 = No Ofsted yet
After School Club	8	246	55% 4 = No Ofsted yet
Before/ Breakfast Club	5	189	80% 1 = No Ofsted yet
Holiday Playscheme	2	115	50% 1 = No Ofsted yet

Table 104 - Supply and quality in early 2019 observed in the South East Tottenham Network Learning Community

Type of Provider	Number of providers in NLC	Total number of places in NLC	% with Met, Good or Outstanding Ofsted
PVI Day Nursery	10	507	60% 2 = No Ofsted yet
Maintained Nursery Class	7	502	86%
Pre-School Playgroup	2	45	100%
Maintained Nursery School	1	184	100%
Triangle Children, Young People and Community Centre	1	147	100%
Registered Childminder	53	320	68% 6 = No Ofsted yet
After School Club	8	223	75% 2 = No Ofsted yet
Before/ Breakfast Club	9	335	100%
Holiday Playscheme	3	80	66% 2 = No Ofsted yet

Table 105 - Supply and quality in early 2019 observed in the Harringay/West Green Network Learning Community

Type of Provider	Number of providers in NLC	Total number of places in NLC	% with Met, Good or Outstanding Ofsted
PVI Day Nursery	11	435	81% 2 = No Ofsted yet
Maintained Nursery Class	11	614	100%
Pre-School Playgroup	3	72	66% 1 = No Ofsted yet
Maintained Nursery School	1	135	100%
Children's Centre Day Nursery	1	100	100%
Registered Childminder	38	222	84% 1 = No Ofsted yet
After School Club	5	253	40% 3 = No Ofsted yet
Before/ Breakfast Club	8	346	100%
Holiday Playscheme	n/a	n/a	n/a

Appendix 2 - Outcomes of Focus Groups with Early Years Childcare Providers and Childminders Survey

During January 2019 a series of three focus group sessions were facilitated with early years childcare providers that operate within the London Borough of Haringey. All representatives of PVI early years childcare settings and maintained nursery classes, and registered childminders received an invitation to attend a focus group session and the logistics and attendance was observed as follows:

Session 1 aimed at early years childcare providers/settings that are located in the West of the Borough was held as follows:

Tuesday, 15th January 2019

1.30pm to 3.30pm

Hornsey School for Girls

and was attended by 20 representatives of such settings.

Session 2 aimed at early years childcare providers/settings that are located in the East of the Borough was held as follows:

Wednesday, 16th January 2019

1.30pm to 3.30pm

Seven Sisters Primary School

and was attended by 10 representatives of such settings.

Session 3 aimed at registered childminders operating throughout the Borough was held as follows:

Thursday, 17th January 2019

7.00pm to 9.00pm

Haringey Civic Centre

and was attended by 7 registered childminders.

The key objective of each focus groups were to further explore key feedback and themes that had been observed and outlined during the telephone interview phase.

A.1 Emerging strengths of the 30 hours childcare offer

A.1.1 A number of attendees at all three sessions agreed that the administrative issues associated with the introduction of the 30 hours childcare offer had progressively resolved and that the period since September 2018 had seemed more embedded and “settled”. One particular feature of the 30 hours ‘system’ which a number of representatives of early years childcare settings repeatedly agreed had improved was “timings for the uploading of and submission of headcount data”.

A.1.2 A number of childminders welcomed the advent of the offer and how it can support families that are experiencing disadvantage. However a number of such childminders also cautioned that the word ‘free’ (in their opinion) had “confused” certain parents, especially “when it comes to paying for extras and meals”. Additionally in terms of the (evidently still thorny issue of) *meals* the representatives of settings who attended the focus group at Hornsey School for Girls suggested that more clarity would benefit certain parents on the specific issue of lunch times and the need settings to still charge for this meal. Additionally a representative of an early years childcare setting that attended the focus group at Seven Sisters Primary School described how they had also experienced challenges with parents agreeing to additional charges aligned to the 30 hours childcare offer. For example, one attendee described how:

“We introduced a fee for lunch and asked parents to also send their children in with a fruit snack. It played out that parents paid the additional cost, reluctantly, but did not pack a fruit snack”.

Indeed, when concluding a conversation on this subject one other attendee made a suggestion which a number of co-participants advocated too – i.e.:

“Using supporting research or data to reinforce the need for such additional charges could help us... as the 30 hours ‘free’ statement is [in my opinion] misleading”

A.2 Perceived shortfalls of the evolving 30 hours childcare offer

A.2.1 Although – as is outlined in 3.1.1 above – representatives of early years childcare settings who attended both focus group sessions believed that the implementation of the 30 hours childcare offer had progressively improved, there was still a belief that the programme was creating additional administrative (and time consuming) issues. Two repetitive words used in terms of their time were “chase” and “remind” particularly with regard to parent’s reconfirming their eligibility. It was evident however that certain providers were strategic in terms of this effort, including through:

- Reminder letters (from the provider)
- Telephone calls and (their own) text messaging to parents

- Having parents/carers reconfirm eligibility, on-line, at the setting
- Identifying parents who may require concerted support in terms of navigating the offer

An attendee at one of the focus group sessions attended by representatives of early years childcare settings outlined:

“It would be good if HMRC could notify the childcare provider when a reconfirmation code request has been sent to parents/carers to ensure they are meeting deadlines”.

A.2.2 ...Childminders who attended their targeted focus group session agreed that there was a lack of understanding among certain parents of under 5 year olds about how they could access the 30 hours childcare offer and the eligibility criteria and system.

A number of registered childminders also believed that the re-confirmation process had not proved to be a smooth process for (again certain) parents and that such parents tended to (over) rely on the childminder themselves to advise them and help them to navigate this process. For example one attending childminder stated:

“Parents come to us for help with re-confirmation... some still don’t know what they need to do...”.

A.3 Priorities for potential change

A.3.1 A number of representatives of maintained nursery classes believed that their counterparts in the PVI sector had adapted to the 30 hours childcare offer and its administrative requirements at a more wholesale speed due to the logistics around how they were able to meet parent’s wishes. For example feedback from representatives of maintained nursery classes included:

“Our opening hours are by their nature more restrictive”.

However, certain representatives of PVI settings believed that their colleagues in the maintained sector were in the advantageous position, in terms of their ability to adapt to parental demand – for example:

“Some ‘schools’ make it difficult for us [PVI settings] to compete as they offer free breakfast clubs”.

A.3.2 As is outlined in 3.5.1 below a number of childminders believed that parents did not readily associate the 30 hours childcare offer with their profession.

Essentially a number also believed that more childminders would be persuaded to provide 30 hours childcare offer places if the hourly funding rate was increased, thus making it a more attractive enterprise for them. Indeed, one childminder stated *“30 hours is simply not for me... it is too much work not enough reward”.*

Another childminder stated (and again quoted the actual amount of hours) *“30 hours a week is not good for us as we work all year round”.*

Additionally, on the theme of viability one childminder contributed *“30 hours isn’t enough – if a family only wants 30 hours per week a lot of us childminders don’t feel we can deliver it... as financially it is not good for us”*.

However, it should be concluded that on this theme, certain childminders were (more) supportive of the advent of the 30 hours childcare offer and perceived it to be an opportunity that other childminders could be more proactive in responding to and using to their *“business advantage”*.

A.4 Role of the London Borough of Haringey

- A.4.1 A number of representatives of early years childcare settings suggested that there could be more awareness about the fact that certain parents were not as IT intuitive or savvy as others. For example, feedback on this issue included:

“Parents are not always clear on what is on offer and some find it hard to access the on-line information”.

“IT can act as a barrier for some parents preventing them from starting the process of eligibility”.

However, there was *repeated praise* of the role that the London Borough of Haringey had played in terms of concisely promoting the 30 hours childcare offer – including in terms of its *“affect on other benefits”* – and in supporting the early years childcare sector. One attendee at the focus group for early years childcare providers situated in the east of the borough made a statement which other co-participants agreed with: *“Haringey Council publicises the 30 hours childcare offer and they are really helpful in terms of explaining to us how we can promote it too... and with sending us marketing ideas”*.

A number of representatives of early years childcare settings did suggest that a priority for the local authority could be examining how it could undertake further work to promote and publicise the 30 hours childcare offer to Haringey-based employers and *with* such employers.

- A.4.2 The participating childminders concurred that the local authority and its services could best help by promoting a message to local young parents that the 30 hours childcare offer can be accessed via registered childminders as well as the local daycare sector.

A.5 Parents and the 30 hours childcare offer

- A.5.1 A number of childminders agreed with a perception that local parents did not hold them in the same esteem as a potential source of 30 hours childcare support as they did local daycare settings. For example, applicable feedback from such childminders included:

“Some parents see nurseries as more official, better equipped and better quality”.

“They [i.e. parents] don’t always realize that we are registered through Ofsted too”.

Certain childminders also concurred that there was *“a lack of information that the 30 hours childcare offer is available through childminders, including information originating from the local authority”*.

However, it was observed how certain childminders acknowledged that (in the words of one of their number) *“...we are not as proactive in marketing as nurseries are”*.

- A.5.2 The representatives of early years childcare settings who attended both focus group sessions repeated how, in their opinion, parents were still on a learning curve as far as *“navigating”* the 30 hours childcare offer was concerned, although the fundamentals about the eligibility processes were percolating to an ever improving extent. Such attendees praised the Haringey Providers Portal as being a source of information where they could check status in terms of eligibility. However the subject of information was repeatedly highlighted, particularly in terms of parental perceptions of the term ‘free’ – for example:

“Some parents still think that 30 hours is all free and any additional costs is included...”

“Parents are not always clear on the process and are unaware they need to register on the term before their child turns 3 years”.

“There have been times when parents turn up expecting to access a place, as they had made an initial enquiry, but have not followed the process through with receiving a code”.

“I have had a parent who assumed that they had completed the registration process, when in fact they had not... the parents continued to access the [30 hours childcare] offer but had to initially pay, which they were not pleased about”.

“The 30 hours ‘free’ childcare is misleading... It should really [in my opinion] be termed ‘30 hour subsidised childcare offer’”.

There was also support within the focus group session facilitated at Hornsey Schools for Girls for paper-based promotion to be circulated to parents of 0 – 2 year olds aligned to any possibility channels for such an approach, including through local Children’s Centres.

Ultimately a number of attending providers agreed that (a) there was only so much a setting, a childminder or the local authority could do and that the parents themselves had to be consistently advised (how) to research the processes, including around eligibility and re-confirmation themselves. and; (b) What all professionals should prioritise was making sure – as best and most effectively as they could – that there was clarity around eligibility, processes and timelines.

Haringey Childcare Sufficiency Action Plan 2019 - 2022

Introduction to the action plan

This Childcare Sufficiency Action Plan has been designed using evidence from Haringey's Childcare Sufficiency Assessment (CSA) which was produced in 2019. Based on the findings of the CSA the action plan has been reviewed and updated to assist the local authority in its duty to manage the childcare market. The Childcare Sufficiency Assessment will be fully reviewed every three years, with the next review due to take place in 2022.

The Action Plan is focused on contributing to improvements in outcomes for children, young people and families. It prioritises the local authority's market management role, as commissioners and brokers, and seeks to involve key partners in the implementation of actions.

The Action Plan links to a number of other strategic priorities, including:

1.1 Borough Plan 2019 - 2022 – Priority 2:

Outcome 4: best start in life: the first few years of every child's life will give them the long-term foundations to thrive

Outcome 5: Happy childhood: all children across the borough will be happy and healthy as they grow up, feeling safe and secure in their family, networks and communities

Outcome 6: Every young person, whatever their background, has a pathway to success for the future

1.2 SEND Local Offer

1.3 Pending Early Help Strategy

1.4 Young people at Risk Strategy

Outcome 4: young people thriving in school, with positive aspirations for the future and access to employment and training opportunities

Priority: The Council will continue the Healthy Child Programme and integrate the 2 year old check with Children's Centres and childcare settings, in order to increase early identification of speech and language difficulties, AS, ADD and other SEND, specifically targeting BAME communities.

Priority: The Council will explore extending speech and language therapy into key stage 2, for children with ongoing difficulties, who fall below the threshold for an Educational Health and Care Plan.

The Action Plan has been developed through engagement activities with parents and carers, stakeholders and providers from October 2018 to March 2019. It focuses on key strands of work in supporting continued improvements in the access to and quality of childcare in Haringey:

- Understanding and awareness amongst residents
- Accessibility of childcare
- Sustainability of childcare market
- Access to childcare for children and young people with SEND or disabilities
- Out of school and holiday provision

The implementation of this action plan will be monitored by the Early Help Commissioning Team on an annual basis. This is the Council's third Action Plan and represents our continued steps in reducing the gaps in childcare provision across the borough.

We prioritised the main areas listed above due to the Childcare Sufficiency Assessment survey and the feedback from childcare providers and parents/carers in Haringey. Whilst there are sufficient childcare places across Haringey as a whole, there are a number of specific areas which will need a more targeted approach. We will ensure there are sufficient, affordable adequate childcare providers in areas of regeneration.

Understanding and awareness amongst residents

Outcomes	Actions	Impact	Lead	When
Increase the draw down on the early years pupil premium, disability access and free school meal funding for children attending early years provision	<p>Encourage families to claim funding through providers to support their children's education and learning.</p> <p>Work with all providers to identify families who are eligible for early years pupil premium, Disability Access funding and Free School Meals for children attending school nurseries across lunchtime.</p> <p>Raise awareness and maximise the offer of the entitlements to families through marketing and publicity campaigns.</p>	More disadvantaged and vulnerable children supported within early years education.	Early Help Commissioning	By April 2021
All parents have access to robust information via Family Information Service Directory (FISD)	Redevelopment of FISD online offer	More families, parents/carers able to find and access appropriate childcare provision to meet their needs	Early Help Commissioning	By April 2020
Improve access to, and take up of, the 2Y0 offer supporting children's outcomes and maximising on funding available	<p>Implement and enhance the parent champion volunteer scheme.</p> <p>Embed an enhanced partnership approach with key council services and partner agencies to engage parents in the take up of the 2Y0 offer.</p>	<p>Increased take up of 2Y0 places.</p> <p>Improved awareness of the benefits of the 2Y0 early education offer amongst targeted groups of parents and communities.</p>	Early Help Commissioning	<p>Phase 1 – January 2020</p> <p>Phase 2 – January 2021</p>
Improved employer understanding and awareness of free entitlements and wider support with childcare costs	Establish employers' attitudes towards providing information regarding childcare to their employees	Increase in employers offering access to flexible childcare arrangements and providing good quality information to	Early Help Commissioning	By March 2022

for working parents	<p>Engage with large employers in the borough and undertake a perception survey of employee childcare needs.</p> <p>Provision of support with childcare information to employers.</p> <p>Work with local employer consortiums and key internal services to establish a profile of childcare for employment needs in the borough.</p>	<p>their employees.</p> <p>More Haringey residents are able to access childcare that enables them to work, train or study.</p> <p>A reduction in parents reporting childcare as a barrier to employment and training.</p>		
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Accessibility of childcare market

Outcomes	Actions	Impact	Lead	When
Haringey's childcare market offers more flexible childcare	<p>Work with existing childcare provision with an emphasis on:</p> <ul style="list-style-type: none"> Flexible Hours/Ad Hoc availability Affordable childcare <p>Engage with potential new childcare providers to deliver a flexible childcare offer.</p> <p>As part of the business support offer, identify and promote different models of delivery to support parents needs and provider sustainability.</p>	More flexible childcare opportunities available for parents across the borough.	Early Help Commissioning	By January 2021
An Increase in the number of culturally appropriate childcare places for Orthodox Jewish families in Haringey.	<p>Work with the Orthodox Jewish community and providers in Haringey and Hackney to explore the opportunities to increase the availability of registered provision in the borough.</p> <p>Explore the development of a Childminder Agency model for Orthodox Jewish childminders.</p>	Orthodox Jewish families in Haringey are enabled to take up childcare provision locally.	Early Help Commissioning	By April 2020
Sufficient childcare is available	Work with LA colleagues who	Parents are able to access	Early Help Commissioning	By January 2021

to meet housing growth and increased populations	<p>are involved in the development of new housing projects to assess the numbers of children projected and the scope to create childcare through developers, where required.</p> <p>Monitoring the sufficiency of childcare in wards with increasing populations and housing growth.</p> <p>Where required, encourage new providers and stimulate growth in the market</p>	<p>appropriate childcare in their locality.</p> <p>Childcare in areas of housing growth enable the economic benefits for local communities to be maximised.</p>		
Families in North Tottenham are able to access more affordable childcare opportunities.	<p>Partnership work between North Tottenham regeneration teams, Early Help Commissioning and local business and enterprise to improve economic regeneration.</p> <p>Pilot flexible models of childcare within the Northumberland Park ward.</p> <p>Gather information on workspace models, parent led childcare, Ad hoc childcare, cooperatives.</p> <p>Contact and visit other Local Authorities who have been successful in delivering models.</p>	An increase in working families improving the local economy.	Early Help Commissioning	By April 2021

Sustainability of childcare market

Outcomes	Actions	Impact	Lead	When
Support childcare providers to deliver sustainable 2Y0 places	Assess the sustainability of providers delivering 2Y0 places	Childcare providers are supported to identify their break even cost supporting	Early Help Commissioning	By March 2020

	<p>Deliver business support to providers to assess sustainability, viability and occupancy</p> <p>Complete a RAG rating to identify providers who are at risk and provide focussed support</p>	their longer term viability and business planning		
Provide structured support for childminders in delivering 30 hours	<p>Systematic and coordinated business support. Increased understanding of maximising the free entitlement offers.</p> <p>Raise awareness amongst Childminders of the 30 hour offer and processes</p>	Childminders are better placed to deliver funded places.	Early Help Commissioning	By April 2020
Encourage collaborative approaches in the planning and delivery of the entitlement offers amongst Network Learning Communities (NLCs).	<p>Invite all childcare providers in NLCs to discuss sufficiency.</p> <p>Plan and deliver collaborative workshop for each of the six NLCs through regular structured half termly meetings.</p>	Collaboration amongst childcare providers to deliver early learning and childcare through partnership working.	Early Help Commissioning	By May 2020

Access to childcare for children and young people with SEND or disabilities

Outcomes	Actions	Impact	Lead	When
Childminders are more confident and able to support children with SEND or disabilities.	<p>Work with Childminders to develop their capacity and confidence to offer inclusive childcare for children with SEND or disabilities.</p> <p>Training Childminders to develop their capacity to meet a wide range of needs including children with SEND or disabilities.</p>	Improved access to support children with SEND or disabilities	Early Help Commissioning	September 2021
Incentivise providers to deliver	Hold market engagement	Increase in childcare/services	SEND Commissioner	February 2020

services for children with SEND or disabilities within Haringey, particularly for short breaks	event to incentivise more providers to deliver in Haringey. Source bid writing support for providers who wish to apply to deliver services.	for children with SEND or disabilities. More short break services delivered in Haringey.		
Increase Early Support places in areas of need	Monitor take up of places to identify demand within wards Review funding available.	Early Support children are commissioned in areas of demand and need.	Head of Strategic Commissioning SEND Commissioner SEND Team	By November 2020
An integrated brokerage system for children 0 – 14 and up to 18 years for children with SEND and vulnerable groups.	Mapping exercise of all childcare supporting children and young people Hold market engagement event Gather data on childcare supporting children with SEND or disabilities including provider who offer pick up and drop off facilities.	Robust information is available to support children with SEND and vulnerable groups.	SEND Commissioner Childcare Engagement Coordinator Sufficiency Officer	By January 2021

Out of school and holiday provision

Outcomes	Actions	Impact	Lead	When
An increase in Breakfast and After School Clubs, holiday clubs in areas of demand for 5 to 11 age range and children with SEND.	Review waiting lists from CSA feedback. Match existing provision with identified demand reported from parents Where required, encourage new providers and stimulate growth in the market	Sufficient Breakfast, After School clubs and holiday clubs available to meet demand.	Early Help Commissioning	By May 2021
An increase in provision for young children 10 to 14 age range	Partnership work between Early Help Commissioning, Active Communities and	Young children are better supported in the community with provision that meets their	Early Help Commissioning	By October 2021

Outcomes	Actions	Impact	Lead	When
	Leisure and Young people at risk to deliver activities that meet young children's needs.	needs and keeps them free from violence.		

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Report for: Cabinet: 12th November 2019

Title: Charging for Managed Accounts 2018/19 MTFS Proposal:
Consultation findings and feedback report

Report
authorised by: Beverley Tarka: Director – Adult Social Services

Lead Officer: John Everson: Assistant Director - Adult Social Services
ext. 4433 john.everson@haringey.gov.uk

Ward(s) affected: All

Report for Key/
Non Key Decision: Key Decision

1 Describe the issue under consideration

- 1.1 Following the decision taken by Cabinet in June 2019 and the subsequent consultation, this report seeks Cabinet approval for the introduction of annual management fees for the administration of accounts for clients who are self funders and those for whom the Council has Department for Work and Pensions (DWP) Appointeeship.
- 1.2 The consultation took place between 22nd July and 8th September 2019. The consultation findings are summarised in section 7 of the report.

2 Cabinet Member Introduction

- 2.1 Following consultation, I present this set of proposals which standardises the Council's approach to the application of management fees where the Council acts on behalf of users to arrange care or to manage their affairs. The proposals set out here, if agreed, build on the principle that clients will contribute fairly and equitably to the cost of their care, within a structured approach.

3 Recommendations

3.1 Cabinet is asked to:

- 3.1.1 Consider the findings of the consultation, the equalities impact assessment of the proposal on protected groups and the actions proposed to mitigate the impact.
- 3.1.2 Approve the introduction of an annual management fee of £650 for the administration of accounts of clients who are self-funders.
- 3.1.3 Approve the introduction of an annual management fee of £650 for the administration of accounts of persons to whom the Council act as Department of Works and Pensions Appointee. Where the person net savings are below £16,000, the annual fee will not exceed 3.5% of the net savings.

4 Reasons for decision

- 4.1 As part of the MTFS [Medium Term Financial Strategy] for 2019/20 the Council agreed to take forward the proposals made to introduce a fee for the administration of accounts, which would generate income of approximately £120K p.a. in relation to self-funders and the management of Department for Work and Pension (DWP) Appointeeship clients.
- 4.2 The number of self-funders who approach the Council for support in arranging their care has been increasing and, it is anticipated, will increase further over the coming years. There is currently no arrangement fee in place to cover the Council's administrative costs which therefore are met by the Council and to ensure there is a sustainable arrangement in place to deliver this service for the future. It is notable that self-funders currently benefit from the preferential rates for care which the Council is able to negotiate on their behalf.
- 4.3 As the number of clients on behalf of whom the Council has DWP Appointeeship also increases, the Council notes that the administrative costs of managing appointee client accounts are growing and that there is no income stream to off-set these costs currently.
- 4.4 The Council already charges administration fees to clients (as set out by the Court) when appointed by the Court of Protection as Deputies to manage their Property & Affairs. The level and type of service provided to Appointeeship clients is similar to that provided to Deputyship clients. The proposal to introduce fees for Appointeeship clients that are comparable for Deputyship client fees would address the current disparity in approach.

5 Alternative options considered

- 5.1 The alternative not to charge was considered but would leave the service unsustainable given the increasing number of clients requiring the service and the commitment to the continued delivery of high-quality service provision that supports the needs of clients.

- 5.2 The option to charge at different rates from those rates applied to Deputyship clients was also considered but it was felt to be more equitable to apply comparable rates of administration for all clients and which would also enable recovery of the costs of the service supplied.

6 Background information

- 6.1 Consultation was carried out on a set of proposals presented to Cabinet in June 2019 for the introduction of annual management fees for clients who are self-funders and those for whom the Council has Department for Work and Pensions Appointeeship.
- 6.2 A self-funder is a person who has eligible needs and approaches the Council to arrange their care – and has savings above the upper capital limit, which is currently £23,250.
- 6.2.1 The Council provides an arrangement service for people who are self-funders. The Council currently supports approximately 85 people who are self-funders and who are therefore charged the full cost of their care. Where care is arranged by the Council, there is no administration fee for arranging that care although all other costs associated with the care are met by the self-funder.
- 6.2.2 The Care Act 2014 introduced a new duty for local authorities to meet the needs of self-funders and the power to charge an arrangement fee. The consultation carried out proposed that the fee is set at £650 per annum for the current year and is payable annually.
- 6.3 DWP Appointeeship is where the Council acts for someone, by collecting their state benefits, maximising benefit income and making payments from these monies for care charges, personal allowance or other items considered to be in the person's best interests. There is currently no allowance made for carrying out these functions. The Council recognises the importance of having a sustainable arrangement in place supporting vulnerable adults to manage their finances and to protect them from potential or actual financial abuse.
- 6.3.1 The consultation proposals were that the charging arrangements for Appointeeship would mirror the approach already in place for Deputyship clients under the Court of Protection. On this basis, therefore, the proposed annual management fee, where the Council acts as corporate appointee for DWP income/benefits, would be £650 per annum for the current year. In order to protect a client's savings to an agreed level, the fee would not be more than 3.5% of the client's net savings where these were below £16,000. The level of savings would be assessed on the anniversary of the date the DWP appointed the council as appointee.
- 6.3.2 The service currently supports over 180 individuals to manage their DWP income. The service is in high demand and it is important that the council continues to provide this service for people who need the support. The current service comprises of two full time posts at a cost of over £80K per year with

additional costs for management and supporting services. If the proposal is approved, the income generated to support the service and support improvements, will be in the region of £50K to £60K per year.

7 Consultation Approach and Outcomes

7.1 The public consultation was open from 22nd July 2019 to 8th September 2019 and comprised a dedicated webpage explaining the consultation and access to an online version of the survey.

7.1.1 Two separate questionnaires were produced, covering:

7.1.1.1 Consultation on the introduction of an annual management fee for the administration of accounts for clients who are self-funders

7.1.1.2 Consultation on the introduction of an annual management fee for managing Department for Work and Pensions (DWP) Appointee Accounts.

7.1.2 3150 service users were sent a hard copy of both questionnaires and a free post envelope in which to return them.

7.1.3 Three drop-in sessions for service users to complete the questionnaires and ask questions about the two proposals were held at Marcus Garvey Library, Wood Green Library and Hornsey Library to ascertain the views of current users and their carers. A direct telephone number for service users to call and ask questions or to ask for support to complete the questionnaires was also provided.

7.2 The consultation for introduction of an annual management fee for the administration of accounts for clients who are self-funders yielded 331 responses. This is a 11% response rate.

7.2.1 The proposal to introduce an administration fee was not supported by two thirds of the people who responded.

As the council looks to make the necessary savings required whilst still supporting the most vulnerable, do you agree with the proposal to charge self-funders for arranging their care?	Total % of the 331 people who responded to this question
Strongly agree	4%
Agree	13%
Disagree	14%
Strongly disagree	55%
Don't know	14%

7.2.2 Of the 171 who responded to the question about the method of collecting charges, over half of the responses preferred the fee to be collected on a 4-weekly basis.

If the charges were agreed, how do you prefer the charges should be collected? Select ONE only.	Total % of the 171 people who responded to this question
Weekly (£12.50)	33%
4-weekly (£50)	54%
Yearly (£650)	12%

7.2.3 The consultation also allowed for further comments on the proposals to be made, and the table below collates the 58 comments into groupings of similar views:

If you have any further comments regarding our proposal to introduce a self-funders fee, please tell us below.	Number of people
Cannot Afford/Will create financial hardship	17
Concerning to charge disabled/elderly/vulnerable people	15
Council should look for savings elsewhere/more efficient	6
Charge is too high	6
Charge is unfair	7
Feels like another penalty for those that have worked hard/saved	5
Should be percentage of Care cost/reviewed case by case	1

7.3 The consultation on the introduction of an annual management fee for the administration of Department for Work and Pensions (DWP) Appointee Accounts yielded 307 responses. This is a 10% response rate.

7.3.1 The proposal to introduce an administration fee for DWP Appointeeship clients was not supported by the majority of people who responded.

As the council looks to make the necessary savings required whilst still supporting the most vulnerable, do you agree with the proposal to introduce charges for this service?	Total % of the 307 people who responded
Strongly agree	2%
Agree	11%
Disagree	13%
Strongly disagree	60%
Don't know	14%

7.3.2 The following table is based on the 60 comments which were received during the consultation and which have been grouped into similar views:

If you have any further comments regarding our proposal to introduce an annual management fee for its DWP Appointee clients, please tell us below.	Number of people
Cannot Afford/Will create financial hardship	22
Concerning to charge disabled/elderly/vulnerable people	20
Council should look for savings elsewhere/more efficient	6
Charge is too high	5
Charge is unfair	4
Feels like another penalty for those that have worked hard/saved	3

- 7.4 The responses to the consultation on the introduction of administration fees for self-funders and for those for whom the Council has Appointeeship were in the main not favourable. People were most concerned about the affordability of the charges and the risk of financial hardship and about charging vulnerable people for fees relating to their care.

7.4.1 In mitigation, for self-funders, however, it should be noted that:

- 7.4.1.1 Self-funders benefit financially to a significant degree when they involve the Council in arranging their care as the Council will negotiate much better market rates for care with care providers than they would be able to negotiate as a self-funding individual.
- 7.4.1.2 Self-funders will be able to decide if they wish to continue and pay the arrangement fee or to make other arrangements for their support that do not involve the Council, meaning that the fee would not be required. This could include arranging care directly with their care provider or asking a relative or friend to do this on their behalf. The self-funders fee is proposed to be collected annually however the council will consider alternative frequency including monthly payments.

7.4.2 For the Appointeeship administration fee, mitigation actions will also be taken, as follows:

- 7.4.2.1 The Council will have the discretion to reduce or waive the fees for those individuals who are unable to afford them. The Council will monitor the implementation of the fee to ensure that people are not put at risk of financial or other hardship by the introduction of the fee.
- 7.4.2.2 In addition, the Appointeeship administration fee will not be applied where a client has £3000 or less in savings and there is therefore a risk of financial hardship for the individual.

8 Contribution to strategic outcomes

- 8.1 Maximising the Council's resources, in particular in the current financial climate, is a key part of the Council's Medium Term Financial Strategy in order to enable the Council to deliver its wider, partnership objectives as set out in the Borough Plan. The overarching vision for the People priority in the Borough Plan is "a Haringey where strong families, strong networks and strong communities nurture all residents to live well and achieve their potential".

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

9.1 Finance

9.1.1 This proposal was formally agreed as part of the 2019/20 Medium Term Financial Strategy.

9.1.2 Income of £120k p.a. will be generated by this initiative.

9.2 Legal

9.2.1 The proposals for consultation and for decision by Cabinet (i.e. charging a management fees for DWP appointee and self-funders) are within the legal powers of the Council.

9.2.2 Under Regulation 33 of the Social Security (Claims and Payments) Regulations 1987, the Secretary of State may appoint the Council to exercise, on behalf of a person entitled to benefit who is unable to act, any right to which that person may be entitled and to receive and deal on his behalf with any sums payable to him. The Council is not obliged to act as an appointee on behalf of persons unable to act for themselves. This is a voluntary discretionary arrangement.

9.2.3 Under Section 93 of the Local Government Act 2003, the Council has the power to charge for providing discretionary services. The recipient of the service must have agreed to its provision. The Council must ensure that for the financial year, the income from charges does not exceed the costs of service provision.

9.2.4 Section 1 of the Localism Act 2011 gives the Council the power to do anything that individuals generally may do. This gives the Council power to charge for the provision of discretionary services. The recipient of the service must have agreed to its provision. The general power is subject to a duty to secure that, taking one financial year with another, the income from charges allowed does not exceed the costs of provision.

9.2.5 Under Section 14 of the Care Act 2014, the Council has the power to charge for meeting the care and support needs of adults. The Care and Support Statutory Guidance, which the Council is obliged to have due regards to, sets out certain principles that local authorities should take into account when making decision on charging.

“8.2 The principles are that the approach to charging for care and support needs should:

- ensure that people are not charged more than it is reasonably practicable for them to pay
- be comprehensive, to reduce variation in the way people are assessed and charged
- be clear and transparent, so people know what they will be charged
- promote wellbeing, social inclusion, and support the vision of personalisation, independence, choice and control
- support carers to look after their own health and wellbeing and to care effectively and safely

- be person-focused, reflecting the variety of care and caring journeys and the variety of options available to meet their needs
- apply the charging rules equally so those with similar needs or services are treated the same and minimise anomalies between different care settings
- encourage and enable those who wish to stay in or take up employment, education or training or plan for the future costs of meeting their needs to do so
- be sustainable for local authorities in the long-term

9.2.6 Under Section 17 of the Act, where the Council exercises its discretion to charge, it must carry out a financial assessment of the adult's resources. The Care and Support (Charging and Assessment of Resources) Regulations 2014 sets out the limits on the Council's power to charge for meeting needs and makes provision in relation to financial assessment. Regulation 5 provides that the charge for putting in place the arrangements to meet needs must be no more than the cost incurred by the Council. Regulation 12 specifies the financial limit for charging. If the financial resources of an adult who is provided with accommodation in a care home (a permanent resident) exceed (in terms of capital) £23,250, the Council is not permitted to pay towards the cost of the provision of that accommodation. In any other case where the financial limit exceeds (in terms of capital) £23,250, the Council may (but need not) pay towards the cost of care and support. For adults (i.e. self-funders) with assets and saving above the financial threshold, the Care and Support Statutory Guidance 2018 provides that:

"8.58 Where the person's resources are above the financial limit, the person's entitlement to local authority support in meeting their needs may be dependent on the request having been made. Therefore it is important that the person, and any carer, advocate or other person they wish to involve, are aware of this ability and the consequences for their care and support. The local authority **must** make clear to the person that they may be liable to pay an arrangement fee in addition to the costs of meeting their needs to cover the costs of putting in place the care and support required.

8.59 Arrangement fees charged by local authorities **must** cover only the costs that the local authorities actually incur in arranging care. Arrangement fees should take account of the cost of negotiating and/or managing the contract with a provider and cover any administration costs incurred.

8.60 Local authorities **must not** charge people for a financial assessment, a needs assessment or the preparation of a care and support plan.

8.61 It may be appropriate for local authorities to charge a flat rate fee for arranging care. This can help ensure people have clarity about the costs they will face if they ask the local authority to arrange their care. However, such flat rate costs **must** be set at a level where they do not exceed the costs the local authority actually incurs.

9.2.7 There is a common law duty on the Council to consult with service users, carers, providers and other stakeholders that are likely to be affected by the

proposed fees. The consultation must take place at a time when the proposals, as with the recommendations, are still at their formative stages. The Council must provide the consultees with sufficient information to enable them properly to understand the proposals being consulted upon and to express a view in relation to it. The information must be clear, concise, accurate and must not be misleading. The consultees must be given adequate time to consider the proposals and to respond. The report at section 7 above sets out how the Council has discharged this common law duty. The Council must give genuine and conscientious consideration to the responses received from the consultees before making its final decision on the proposals.

9.2.8 As part of its decision-making process, the Council must have “due regard” to its equalities duties. Under Section 149 Equality Act 2010, the Council in exercise of its adult care and support functions, must have “due regard” to the need to eliminate discrimination, advance equality of opportunity between persons who share a protected characteristic and those who do not, foster good relations between persons who share a relevant protected characteristic and persons who do not share it in order to tackle prejudice and promote understanding. The protected characteristics are age, gender reassignment, disability, pregnancy and maternity, race, religion or belief, sex and sexual orientation. In line with its equalities duties, the Council must undertake an Equality Impact Assessments (EIA) of the proposals on the protected groups. The Council is required to give serious, substantive and advance consideration of the what (if any) the proposals would have on the protected group and what mitigating factors can be put in place. This exercise must be carried out with rigour and an open mind and should not be a mere form of box ticking. These are mandatory consideration. In line with its equalities duties, the Council have undertaken Equality Impact Assessments (EQIA) of the proposals on the protected groups and are set out in Appendices 1 and 2 and in summary at section 9 of the report together with the steps to mitigate the impact of the proposals.

9.2.9 The responses to the consultation on the proposals, the EQIA of the proposals and the steps being taken to mitigate the impact, the general duties of the Council under the Care Act and the Statutory Guidance referred to above, all must be considered before Cabinet makes its decision on the proposals. Cabinet members must ask themselves a) whether it is justifiable to seek to make financial savings in the way proposed; b) whether the mitigating steps proposed are sufficient or whether more needs to be done; and c) whether the proposals ought to be adopted or discarded.

9.3 Equalities

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

9.3.2 The three parts of the duty apply 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.

9.3.3 A full equality impact assessment has been completed for each proposal. For the DWP appointee management fee it is recognised that the proposal will impact negatively on people who share the protected characteristics. This should be expected as those affected will be either current or future users of adult social care services and this care is provided to people as a result of long-term health conditions, disability or age.

9.3.4 However, the council like other authorities across the country need to make significant budget savings and at the same time continue to provide vital services for its vulnerable residents. Introducing the DWP management fee will help ensure that the service is sustainable for the future and continue to support vulnerable people to help manage their finances and prevent financial abuse.

9.3.5 The equality impact assessment undertaken identified potential impact and sets out the mitigating actions the council will take to prevent financial hardship.

9.3.6 For the self-funding administration fee, it is recognised that this is likely to have a negative impact on individuals who share the protected characteristics. However, this will only be applied to people with savings above the upper charging limit for care, currently over £23,250. People with savings below this figure will not be required to pay the administration fee. This means that people in lower income groups who also have protected characteristics will not be required to pay the proposed fee. The impact on the most vulnerable service users is therefore likely to be limited.

10 Use of Appendices

10.1 Appendix 1: Equality Impact Assessment: Self Funder proposals

10.2 Appendix 2: Equality Impact Assessment: DWP Appointeeship proposals

11 Local Government (Access to Information) Act 1985

None

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EQUALITY IMPACT ASSESSMENT

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

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 protected 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	Charging for Managed Accounts
Service area	Commissioning
Officer completing assessment	Farzad Fazilat
Equalities/ HR Advisor	Louise Hopton Beatty
Cabinet meeting date (if applicable)	12 November 2019
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*

Introduce charging administration fees for Self-Funders

The MTFS for 2023/24 agreed the proposal to introduce administration fees for self-funders. This proposal is necessary in order to ensure the long-term sustainability of this service, for which currently no charges are made and which is expected to grow as the number of self-funders seeking arrangement of their care also increases.

A self-funder is someone who has assets and savings over £23,250 and is not eligible for LA support and should pay the full cost of their own care and support.

Self-funders receive help with information and advice on arranging care and support.

Currently some self-funders ask the Council to pay for the full cost of their care and they pay back the costs of the care only. There is currently no charge for the administration involved in setting up the care. There is, however, an administration cost to the Council related to fee negotiations, payments, billing and collection of funds.

It is proposed that where clients are self-funders, and where they have substantial funds and assets and require care and support, they are charged for the service they receive.

The proposal seeks to support additional income of £55K per year through raising this charge. It is proposed that the charges would be introduced in December 2019.

As the number of self-funding clients increase, the council recognises the administrative costs of managing self-funder payments, negotiations and recovery of payments is increasing and there is a need to off-set this increasing cost.

The proposed fees applicable from 1 December 2019 for self-funders clients is a flat fee of £650 per annum.

Where the self-funder service ends before the date the annual fees are due to be charged then pro rata fees will be calculated.

What will this mean:

The proposal will impact on current self-funder clients who do not pay an administration fee to the council for arranging their care.

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	Haringey Population	Service users	Staff
Sex	GLA Projections (2017)	Mosaic data of service users	N/A
Gender Reassignment	N/A	Current data on service users does not breakdown by gender reassignment.	N/A
Age	GLA Projections (2017)	Mosaic data of service users	N/A
Disability	N/A	Mosaic data of service users	N/A
Race & Ethnicity	GLA Projections (2017)	Mosaic data of service users	N/A
Sexual Orientation	N/A	Current data on service users does not breakdown by sexual orientation.	N/A
Religion or Belief (or No Belief)	N/A	Current data on service users does not breakdown by religion or belief.	N/A
Pregnancy & Maternity	N/A	Current data on service users does not breakdown by pregnancy and maternity.	N/A
Marriage and Civil Partnership	N/A	Current data on service users does not breakdown by 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.

A. Sex

Table 1.1 - shows the overall Haringey data for gender

Gender	All Haringey	%
All		

people	222,075	
Males	112,270	51
Females	109,805	49

Table 1.2 - shows the gender of Adult Social Care users and of the 85 people who are self-funders and have savings over £23,250 as of 23.4.19.

	Total Adult Social Care Service Users	Total Adult Social Care Users (%)	Self funders	Self funders %
Gender				
Male	1502	48	29	34
Female	1654	52	56	64

B. Age

Table 1.3 - shows the overall Haringey data for age.

Age	All Haringey	%
Total	222,075	
18-20	8,930	4
21-60	177,561	80
61+	35584	16

Table 1.4 - shows the age groups of the 3156 service users in receipt of social care and of the 85 people who are self-funders and have savings over £23,250 as of 23.4.19.

Age	Total Adult Social Care Service Users	Total Adult Social Care Users (%)	Self-funders (85)	Self-funders (%)
18-20	59	-	-	-
21-60	1278	40		1
61+	1819	60	84	
65+	-	-	-	99

C. Race and Ethnicity

Table 1.5 - shows the overall Haringey data for race and ethnicity.

Race and Ethnicity	Haringey (2017 GLA Projections) %
White	65%
Mixed / Multiple	5%
Asian / Asian British	10%
Black / African / Caribbean / Black British	16%
Other Ethnic Group	5%

Table 1.6 - shows the race and ethnicity of the 3156 service users in receipt of social care and of the 85 people who are self-funders and have savings over £23,250 as of 23.4.19.

Race and Ethnicity	Total Adult Social Care Service Users	Total Adult Social Care Users (%)	Self- funders (85)	Self-funders (%)
White	1466	46	50	59
Mixed / Multiple	66	2	1	1
Asian / Asian British	227	7	1	1
Black / African / Caribbean / Black British	1086	34	23	27
Other Ethnic Group	119	4	2	2
No data	195	6	8	10

D. Sexual orientation

3.2% of London identified as either Gay, Lesbian, Bisexual or Other (not heterosexual) in 2017.

Data on sexual orientation among appointees is not available, so it is therefore not possible to say whether this group is more likely to be appointees or not.

E. Gender reassignment

Gender Reassignment: No real data “Data on gender identity are still currently limited, though data collection methodology and question design are developing. Some work is being undertaken around gender identity and capturing trans or non-binary identities by other national statistics agencies for their respective censuses; work often involves a consideration or review of the sex question or response categories.”

Data on gender reassignment among appointees is not available, so it is therefore not possible to say whether this group is more likely to be appointees or not.

F. Religion or belief (or no belief)

Table 1.7 – shows the overall data for Haringey

Religion or belief (or no belief)	<u>Haringey</u> <u>(2017 GLA</u> <u>Projections)</u> <u>%</u>
Not Stated	8.9
Christian	45
Catholic	No breakdown
Hindu	1.80
Jewish	3.00
Muslim	14.20
Sikh	0.30
Buddhist	1.10
Greek Orthodox	No breakdown
Other	0.50
No Religion	25.20

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

A public consultation was open from 22 July 2019 to 8 September 2019 and comprised: a dedicated webpage explaining the consultation and access to an online version of the survey and a separate questionnaire. The questionnaire was sent to 3150 service users with free post return envelope. A direct number for service users to call and ask questions or help to complete the questionnaires.

In addition, three drop-in sessions for service users to complete the questionnaire and ask questions about the two proposals were convened. The drop-in sessions were held at Marcus Garvey Library, Wood Green Library and Hornsey Library to ascertain the views of current service users, their carers of the adults who receive service in Haringey.

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 consultation resulted in 342 responses.

General feedback from consultation:

The proposal to introduce administration fee was not supported by 69%. Two thirds of the 312 people who responded - 55% strongly disagreed and 14% disagreed).

Age

259 people indicated their age. 63% of the respondents were aged over 60. This is slightly lower than those likely to be impacted. Of the 85 service users who are impacted 99% are over 60 years of age. This response should have been expected as this age group is also over-represented in the wider cohort of all Adults Social users.

(See table 1.4 above for supporting information).

All age groups had over 50% either disagree or strongly disagree with the proposal, with the exception of 21-24 which only had 30% (however 60% replied 'don't know' in this age category). The highest level of disagreement came in 85+ respondents with 87% of those disagreeing with the proposal.

Sex

259 people supplied this information. Of the 259, 39% were female, 37% were male and 24% did not supply this information. The 39% response from females is a slightly lower representation compared to the overall all Adult Social Care users of which 52% were females see table 1.2 above for details).

There was minimal difference between male and female responses, with 63% of males disagreeing with the change and 65% of females.

Disability

272 people supplied this information.

80% of respondents considered themselves to have a disability. This was expected as care and support are provided to vulnerable adults all of whom are disabled in some way in order to meet Care Act eligibility.

Notably people without a disability disagreed more with the change, with 79% disagreeing (73% strongly disagree) compared to 65% for those with a disability, although both disagree overall.

Race and Ethnicity

The people who supplied this information were predominately from the following: 38% white and 27% Black / African / Caribbean This ratio of responses should be expected as these groups reflect the profile of people who are self-funders and receive adult social care. This also supported by the overall Haringey data from the Haringey (2017 Greater London Authority) projections.

All ethnicities disagreed with the change with more than 50% either disagreeing or strongly disagreeing, with the exception of Mixed (however similar to the age breakdown, 40% of responses were 'don't know'). Mixed ethnicities disagreed the least with only 45% disagreeing (18% strongly disagreeing) however this was only 11 responses. White, Black and Asian all had similar levels of disagreement, with 62%, 67% and 67% disagreeing (and 46%, 52%, 53% strongly disagreeing).

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

Those affected will be either current or future service users of Adult Social care and where the council provides a free administration for care provisions.

1. Sex

As of 23 April 2019, there are 85 service users who are self-funders whose assets and saving is above £23,500. There were 56 (66%) female and 29 (34%) male users. This proposal will therefore impact a larger proportion of females. This is higher than the wider population receiving adult social care, where females are over-represented. 1654 Adult Social Care Service Users were female (54%) and 1502 were male (46%).

Positive		Negative	X	Neutral impact		Unknown Impact	
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2. Gender reassignment

Data on gender reassignment among self-funders is not available, so it is therefore not possible to say whether this group is more likely to be self-funders or not. While there is not data to suggest that transgender people are more likely to be recipients of adult social care, according to the charity Stonewall this group is more likely to lack support from their families, and therefore could be self-funders.

Positive		Negative		Neutral impact		Unknown Impact	X
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3. Age

As of 23 April 2019, there are 85 service users who are self-funders whose assets and savings are above £23,500. Age group of 65+ are 99% of this group. The implementation of the arrangement fee is expected to have a greater impact for older people.

It should be noted that this age group is also over-represented in the wider cohort of Adult Social Care users - of the 3156 Adult Social Care Users, 60% are 61+.

Positive		Negative	X	Neutral impact		Unknown Impact	
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4. Disability

Care and support are provided to vulnerable adults all of whom have a disability. Adults who receive this service and where they have asked the council to make payments to providers of care on their behalf will be affected by this proposal.

Positive		Negative	X	Neutral		Unknown	
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				impact		Impact	
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5. Race and ethnicity

As of 23 April 2019, there are 85 service users who are self-funders whose assets and saving is above £23,500.

The impact of this proposed change will impact across all ethnicity groups, however, there is likely to be a greater impact for the following groups: White (47%). This is expected as these groups are predominant in the people being provided Adult Social Care.

Positive		Negative	X	Neutral impact		Unknown Impact	
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6. Sexual orientation

Data on sexual orientation among self-funders is not available, so it is therefore not possible to say whether this group is more likely to be self-funders or not. There is no data to suggest that LGBT people are more likely to be self-funders, and therefore this group is not expected to be disproportionately impacted by the proposal.

Positive		Negative		Neutral impact		Unknown Impact	X
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7. Religion or belief (or no belief)

Data on religion or belief among self-funders is not available, so it is therefore not possible to say whether this group is more likely to be self-funders or not. There is no data to suggest that people of certain faiths are more likely to be self-funders, and therefore the proposal is not expected to have a disproportionate impact on this area.

Positive		Negative		Neutral impact		Unknown Impact	X
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8. Pregnancy and maternity

Data on pregnancy and maternity among self-funders is not available, so it is therefore not possible to say whether this group is more likely to be self-funders or not. However, given that the majority of self-funders are aged 61+, there is not an expectation that this group is more likely to be self-funders, and therefore the proposal is not expected to have a disproportionate impact on this area.

Positive		Negative		Neutral impact		Unknown Impact	X
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9. Marriage and Civil Partnership

Data on marriage and civil partnership status among self-funders is not available, so it is therefore not possible to say whether one group is more or less likely to be self-funders. There is not data to suggest that those in a marriage or civil partnership are more likely to be self-funders, and therefore this group is not expected to be disproportionately impacted by the proposal.

Positive		Negative		Neutral impact		Unknown Impact	X
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10. Groups that cross two or more equality strands e.g. young black women

Older people with a disability are more likely to be impacted by the proposed changes, therefore during the consultation we will try to capture information from people from this group, to minimise any disproportionate impact the proposed changes could have on them.

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 relevant protected characteristics?
- Will the proposal help to advance equality of opportunity between groups who share a relevant 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 relevant protected characteristic and those who do not?

Implementation of this proposal would affect current and future adult social care service users aged 18 and over and who request the council arrange their care and have savings over £23,250.

Currently self-funders who arrange their own care (or their own families) do not benefit from the reductions that are achieved as a result of the purchase at scale in which the Council becomes involved.

Analysis indicates that the introduction of administration fees will impact on the protected characteristics of disability, age and ethnicity.

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 EqlA guidance

Outcome	Y/N
No major change to the proposal: the EqlA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken. <u>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.</u>	N
Adjust the proposal: the EqlA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. Clearly <u>set out below</u> 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	Y
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 relevant protected characteristics are impacted?	Action	Lead officer	Timescale
Implementation of this proposal would affect current and future adult social care service users aged 18 and over and who request the council arrange their care and have savings over £23,250.	Record of appeals will be kept.	Farzad Fazilat	From date of implementation and ongoing.
<p>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.</p> <p>The council recognises that this proposal will disproportionately impact on people with protected characteristics based on age, gender, disability, race and ethnicity but only in so far as these are the users of adult social care in the borough who are more likely to be older, female, disabled and from certain backgrounds.</p> <p>The arrangement fee will only be applied to people with savings who have capital above the upper charging limit for care, currently over £23,250. People with savings below this figure will not be required to pay the administration fee. This means that people in lower income groups who also may have protected characteristics will not be required to pay the proposed fee.</p> <p>The administration fee will only be applied following a financial assessment and after it has been explained to the individual that they are liable to pay an arrangement fee in addition to the costs of meeting their care needs. This approach will ensure that people are aware of the fee before it is applied and it is done in a transparent and fair manner. This also allows the individual to make a choice.</p> <p>The self-funders fee is proposed to be collected annually however the consultation strongly supported that the arrangement fee is paid 4-weekly rather than yearly. If the fee is collected in instalments then there are extra administration costs associated with this, however, factoring in consultation feedback people will be advised that our preferred option is annual but individuals can choose to pay it in instalments. This will be communicated during the financial assessment process.</p> <p>People who pay the fee will no longer be liable to pay should their savings fall below £23,250. Financial assessment reviews will ensure that people who are self-funders but are approaching the £23,250 threshold for savings, will be closely monitored to ensure the fee is not charged at the point their savings fall below £23,250.</p> <p>People will have the right to make a complaint if they believe that the fee has been applied incorrectly or unfairly.</p>			
6 c) Summarise the measures you intend to put in place to monitor the equalities			

impact of the proposal as it is implemented:

Keep a record of all appeals.

7. Authorisation

EqlA approved by Date 1st November 2019



.....
(Assistant Director/ Director)

8. Publication

Please ensure the completed EqlA is published in accordance with the Council's policy.

Please contact the Policy & Strategy Team for any feedback on the EqlA process.

EQUALITY IMPACT ASSESSMENT

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

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	Charging an annual management fee for managing Department for Work and Pensions (DWP) accounts
Service area	Commissioning
Officer completing assessment	Farzad Fazilat
Equalities/ HR Advisor	Louise Hopton Beatty
Cabinet meeting date (if applicable)	12 November 2019
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*

Introduce charging administration fees for appointeeship

The Council, as part of its Medium-Term Financial Strategy (MTFS) agreed to the proposal to introduce administration fees for the management of accounts. Specifically, this is for the Department for Work and Pensions (DWP) appointeeship clients. In June 2019, Cabinet agreed to carry out consultation on this proposal and this EQIA has been updated to reflect the findings from the consultation.

The Council has a duty to manage its finances and recover the cost of the services it provides where appropriate.

Adults have the right to manage their own financial affairs. However, this may be difficult for some individuals due to lack of capacity, illness and or disability.

Where a person becomes unable to manage their own financial affairs and has not put into place a lasting power of attorney, the matter can be taken to the Department for Work and Pensions (DWP) and / or Court of Protection to request a third party is appointed to support the individual.

The third party can be a friend, family member or an organisation (including the council as corporate appointee). Where the individual requiring this support only has DWP income, then an appointee can be appointed by the DWP.

Most local authorities provide a money management service for adult social care users who are unable to manage their own financial affairs. The council recognises the importance of supporting vulnerable adults to manage their finances and to protect them from potential or actual financial abuse.

The council only becomes DWP appointee or court appointed deputy for finances as a last resort where there is no other party (or suitable party due to safeguarding concerns) to undertake this role.

What is appointeeship:

A Department for Work and Pensions appointee is the person who is appointed by the DWP to manage an individual's DWP income.

The appointee responsibility includes making and maintaining any benefit claims, collecting payments and managing the money including the payment of bills.

Current Practice:

Currently the council does not charge administration fees for the management of appointeeship clients, although it does for deputyship clients, where there are administration fees for managing deputyship client funds and assets.

The full set of deputyship charges for local authorities are set out by the Court of Protection (Practice Direction 19B Fixed Costs in the Court of Protection).

Proposal:

The council is currently able to charge court of protection clients based on legislative guidance issued by the Court of Protection.

It is proposed that the charging arrangements for Appointeeship would mirror the approach already in place for deputyship clients under the Court of Protection. Therefore, the proposed annual management fee, where the council acts as corporate appointee for DWP income/ benefits, would be £650 per annum for the current year. However, where an individual's net savings are below £16,000, the fee will not exceed 3.5% of the client's net savings on the anniversary date the DWP appointed the council as appointee.

The proposed fees would be applicable from 01 December 2019.

There is no national policy governing charging for DWP Appointeeship. Policy and charges are therefore subject to local council decisions under section 93 of the Local Government Act 2003 and section 1 of the Localism Act 2011, which gives the council the power to charge for discretionary services. There is an increasing number of local authorities charging for this service and the charging regimes differ.

Table A in Appendix 1 highlights the approach other LAs are taking.

Where the appointeeship ends before the date the annual fees are due to be charged then pro rata fees will be calculated.

What will this mean:

The proposal will impact on current corporate DWP appointee clients where the council manages their DWP income / benefits and future DWP appointee clients.

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	Haringey Population	Service users	Staff
Sex	GLA Projections (2017)	Mosaic data of service users	N/A
Gender Reassignment	N/A	Current data on service users does not breakdown by gender reassignment.	N/A
Age	GLA Projections (2017)	Mosaic data of service users	N/A
Disability	N/A		N/A

		Mosaic data of service users	
Race & Ethnicity	GLA Projections (2017)	Mosaic data of service users	N/A
Sexual Orientation	N/A	Current data on service users does not breakdown by sexual orientation.	N/A
Religion or Belief (or No Belief)	GLA Projections (2017)	Current data on service users does not breakdown by religion or belief.	N/A
Pregnancy & Maternity	N/A	Current data on service users does not breakdown by pregnancy and maternity.	N/A
Marriage and Civil Partnership	N/A	Current data on service users does not breakdown by 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.

A. Sex

Table 1.1 - shows the overall Haringey data for gender

Gender	All Haringey	%
All people	222,075	
Males	112,270	51
Females	109,805	49

Table 1.2 - shows the gender of Adult Social Care users and of the 188 people who used the Appointeeship Service as of 9.8.18.

Gender	Total Adult Social Care Service Users	Total Adult Social Care Users (%)	Service users using the Appointeeship service (188)	Service users using the Appointeeship service (188) %

Male	1502	48	101	54
Female	1654	52	87	46
Unidentified	3	0	0	0

B. Age

Table 1.3 - shows the overall Haringey data for age.

Age	All Haringey	%
Total	222,075	
18-20	8,930	4
21-60	177,561	80
61+	35584	16

Table 1.4 - shows the age groups of the 3156 service users in receipt of social care and those service users who the council acted as DWP appointee (188 users as at 9.8.19).

Age	Total Adult Social Care Service Users	Total Adult Social Care Users (%)	Service users using the Appointeeship service (188)	Service users using the Appointeeship service (188) %
18-20	59	-	-	-
21-60	1278	40	59	31
61+	1819	60	129	69

C. Race and Ethnicity

Table 1.5 - shows the overall Haringey data for race and ethnicity.

Race and Ethnicity	Haringey (2017 GLA Projections) %
White	65%
Mixed / Multiple	5%
Asian / Asian British	10%
Black / African / Caribbean / Black British	16%
Other Ethnic Group	5%

Table 1.6 - shows the race and ethnicity of the 3156 service users in receipt of social care and those service users who the council acted as DWP appointee (188 users as at 9.8.19).

	Total Adult Social Care Service Users	Total Adult Social Care Users (%)	Service users using the Appointeeship service (188)	Service users using the Appointeeship service (188) %
Race and Ethnicity				
White	1466	46	102	54
Mixed / Multiple	66	2	2	1
Asian / Asian British	227	7	7	4
Black / African / Caribbean / Black British	1086	34	57	30
Other Ethnic Group	119	4	9	5
No data	195	6	11	6

D. Sexual orientation

3.2% of London identified as either Gay, Lesbian, Bisexual or Other (not heterosexual) in 2017.

Data on sexual orientation among appointees is not available, so it is therefore not possible to say whether this group is more likely to be appointees or not.

E. Gender reassignment

Gender Reassignment: No real data “Data on gender identity are still currently limited, though data collection methodology and question design are developing. Some work is being undertaken around gender identity and capturing trans or non-binary identities by other national statistics agencies for their respective censuses; work often involves a consideration or review of the sex question or response categories.”

Data on gender reassignment among appointees is not available, so it is therefore not possible to say whether this group is more likely to be appointees or not.

F. Religion or belief (or no belief)

Table 1.7 – shows the overall data for Haringey

	<u>Haringey</u> <u>(2017 GLA</u> <u>Projections)</u> <u>%</u>
Religion or belief (or no belief)	
Not Stated	8.9
Christian	45
Catholic	No breakdown
Hindu	1.80
Jewish	3.00

Muslim	14.20
Sikh	0.30
Buddhist	1.10
Greek Orthodox	No breakdown
Other	0.50
No Religion	25.20

Table 1.8 - shows the religion or belief (or no belief) of the 3156 service users in receipt of social care and those service users who the council acted as DWP appointee (188 users as at 9.8.19).

Religion or belief (or no belief)	Total Adult Social Care Service Users	Total Adult Social Care Users (%)	Service users using the Appointeeship service (188)	Service users using the Appointeeship service (188) %
Christian	876	28	53	28
Catholic	170	5	15	8
Hindu	47	1	3	2
Jewish	70	2	4	2
Muslim	304	10	8	4
Sikh	8	0		
Buddhist	7	0		
Greek Orthodox	97	3	2	1
Other	77	2	2	1
No Religion	129	4	8	4
Not stated	1367	43	93	49
Rastafarian	7	0		
No data	3159	100	188	100

G. Pregnancy and maternity

Data on pregnancy and maternity among appointees is not available, so it is therefore not possible to say whether this group is more likely to be appointees or not.

H. Marriage and Civil Partnership

Data on marriage and civil partnership among appointees is not available, so it is therefore not possible to say whether this group is more likely to be appointees or not.

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

The public consultation was open from 22 July 2019 to 8 September 2019 and comprised: a dedicated webpage explaining the consultation and access to an online version of the survey and a separate questionnaire. The questionnaire was sent to 3150 service users with free post return envelope. A direct number for service users to call and ask questions or help to complete the questionnaires.

In addition, three drop-in sessions for service users to complete the questionnaire and ask questions about the two proposals were convened. The drop-in sessions were held at Marcus Garvey Library, Wood Green Library and Hornsey Library to ascertain the views of current service users, their carers of the adults who receive service in Haringey.

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 proposed fee will impact on service users who use the council's DWP Appointeeship service.

The consultation resulted in 312 responses. Those who responded were broadly representative of service users in terms of age, disability and ethnicity.

General feedback from consultation:

The proposal to introduce administration fee was not supported by 73% of the 312 people who responded (60% strongly disagreed and 13% disagreed).

Age

246 people indicated their age. 67% of the respondents were aged over 60. This proportion was expected as this age group is also over-represented in the wider cohort of all Adults Social Care users and service users who also receive a DWP service.

There was a minimal difference between male and female responses, with 66% of males disagreeing with the change and 70% of females.

In all age groups at least half of respondents disagreed with the change, however younger respondents were more likely to agree with the change, with 50% of 21-24 year olds and 52% of 30-44 year olds disagreeing. A bigger majority of the 60+ respondents disagreed with 83% of 90+ year olds, 86% of 85-89 year olds and 83% of 60-64 year olds disagreeing.

Sex

246 people responded to this question. Of the 246, 39% were female, 40% were male and 21% did not supply this information. The 40% response from males is a slight under-representation compared to the overall profile of all Adult Social Care users of which 48% are male see table 1.2 above for details).

Disability

271 people supplied this information. 88% of respondents considered themselves to have a disability. This was expected as care and support are provided to vulnerable adults because they have care and support needs arising from age or disability and also require the management of their DWP income.

Notably people without a disability disagreed more with the change, with 89% disagreeing (83% strongly disagree) compared to 68% for those with a disability, although both disagree overall

Race and Ethnicity

The people who supplied this information were 38% white and 28% Black / African / Caribbean. This proportion is expected as these groups reflect broadly the profile of people being provided the Appointeeship Service, as well as of those receiving Adult Social Care. This is also supported by the overall Haringey data from the Haringey (2017 Greater London Authority) projections (see table 1.6 for details).

All ethnicities disagreed with the change with 50% either disagreeing or strongly disagreeing. Mixed ethnicities disagreed the least with only 55% disagreeing (27% strongly disagreeing) however this was only 11 responses. White ethnicity disagreed the most with 74% of respondents disagreeing (59% strongly disagree).

Religion or belief (or no belief)

312 people supplied this information of whom 46% were Christian and 11% Muslim. 27% did not state their religion (see table 1.8 for details). Haringey is a religiously diverse area, with the largest religion being Christianity. The response was expected as this reflects the profile of people being provided the Appointeeship Service, as well as of those receiving Adult Social Care.

Breaking down by religion, all religions had over 50% of respondents disagree with the change.

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 EqlA guidance

Those affected will be either current or future service users of Adult Social care and where the council manages their DWP income.

Social care is provided to people as a result of long-term health conditions, disability and age; as a result, these categories will be impacted.

The proposal to introduce the DWP administration fee will impact on service users who currently have their DWP income managed by the council.

At present there are 3156 service users who are in receipt of Adult social care. Of the 3156 people, 188 (6%) will be directly affected by this proposal.

1. Sex

As of August 2018, of the 188 service users whose income is managed by the council through DWP Appointeeship, there were 101 male users (54%) and 87 female users (46%). This proposal

will therefore impact a slightly larger proportion of males. This is in contrast with the wider population receiving adult social care, where females are over-represented. 1654 Adult Social Care Service Users were female (54%) and 1502 were male (46%).

This compares to a broadly even gender split in the wider Haringey population, where 49% of residents are female and 51% are male.

There is limited concern around this protected characteristic, as males are only slightly more likely to be affected than females.

Positive		Negative	X	Neutral impact		Unknown Impact	
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2. Gender reassignment

Data on gender reassignment among appointees is not available, so it is therefore not possible to say whether this group is more likely to be appointees or not. While there is not data to suggest that transgender people are more likely to be recipients of adult social care, according to the charity Stonewall this group is more likely to lack support from their families, and therefore could be more likely to become appointees.

Positive		Negative		Neutral impact		Unknown Impact	X
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3. Age

As of 9 August 2018, of the 188 service users where the council manages their DWP income, 129 are 61+ (69%) and 59 are under 61 years of age (31%). This age group is also over-represented in the wider cohort of Adult Social Care users: of the 3156 Adult Social Care Users, 1819 are 61+ (60%).

While the proposal will impact all age groups, it is expected that the impact will fall mostly on those aged 61+ because of the profile of Adult Social Care users.

Positive		Negative	X	Neutral impact		Unknown Impact	
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4. Disability

Care and support are provided to vulnerable adults all of whom have a disability. Adults who receive this service and where their DWP income is managed by the council through DWP Appointeeship will be affected by this proposal.

Positive		Negative	X	Neutral impact		Unknown Impact	
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5. Race and ethnicity

As of 09 August 2018, the ethnicity of the 188 service users was as follows:

Asian / Asian British	7	4%
Black / African / Caribbean / Black British	57	30%
Mixed / Multiple	2	1%
White	102	54%
Other Ethnic Group	9	5%
Unidentified	11	6%

The impact of this proposed change will impact across all ethnicity groups, however, there is likely to be a greater impact for the following groups: Black / African / Caribbean / Black British and White British as this profile reflects the profile of those people receiving the Appointeeship Service, as well as receiving Adult Social Care. This also supported by the overall Haringey data from the Haringey (2017 Greater London Authority) projections.

Positive		Negative	X	Neutral impact		Unknown Impact	
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6. Sexual orientation

Data on sexual orientation among appointees is not available, so it is therefore not possible to say whether this group is more likely to be appointees or not. There is not data to suggest that LGBT people are more likely to be appointees, and therefore this group is not expected to be disproportionately impacted by the proposal.

Positive		Negative		Neutral impact		Unknown Impact	X
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7. Religion or belief (or no belief)

The impact of this proposed change will impact across all religious groups however, more Christians will be affected as they comprise the largest proportion of people receiving the Appointeeship Service, as well as Adult Social Care. This also supported by the overall Haringey data from the Haringey (2017 Greater London Authority) projections. It is noted that over 40% people who receive adult social care and the appointeeship service have not stated their religion.

Positive		Negative	X	Neutral impact		Unknown Impact	
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8. Pregnancy and maternity

Data on pregnancy and maternity among appointees is not available, so it is therefore not possible to say whether this group is more likely to be appointees or not. However, given that the majority of appointees are aged 61+, there is not an expectation that this group is more likely to be appointees, and therefore the proposal is not expected to have a disproportionate impact on this area.

Positive		Negative		Neutral impact		Unknown Impact	X
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9. Marriage and Civil Partnership

Data on marriage and civil partnership status among appointees is not available, so it is therefore not possible to say whether one group is more or less likely to be appointees. There is not data to suggest that those in a marriage or civil partnership are more likely to be appointees, and therefore this group is not expected to be disproportionately impacted by the proposal.

Positive		Negative		Neutral impact		Unknown Impact	X
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10. Groups that cross two or more equality strands e.g. young black women

Older people with a disability are numerically more likely to be impacted by the proposed changes, as well as Black/African/Caribbean/Black British people.

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 relevant protected characteristics?
- Will the proposal help to advance equality of opportunity between groups who share a relevant 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 relevant protected characteristic and those who do not?

Implementation of this proposal would affect current and future adult social care service users aged 18 and over, where the council manages their benefit income through Department for Work and Pensions (DWP) Appointeeship.

Analysis indicates that the introduction of administration fees will impact on the protected characteristics of disability, age and ethnicity.

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 EqlA guidance

Outcome	Y/N
No major change to the proposal: the EqlA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken. <u>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.</u>	N
Adjust the proposal: the EqlA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. Clearly <u>set out below</u> 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	Y -see comments below, people will not be charged if who have £3000 or less in savings.
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 relevant protected characteristics are impacted?	Action	Lead officer	Timescale
The implementation of the fee will be monitored to ensure that people are not put at risk by the introduction of the fee.	Records will be kept of appeals and any challenges.	Raj Darbhanga	From date of implementation and ongoing.
The council will undertake appropriate due diligence to ensure, where clients and their representatives want to take back their appointeeship, that the client is not subject to or at risk of being subjected to financial abuse or put at risk because of a lack of support to meet their financial commitments, in line with our safeguarding duties.	Records will be kept of appeals and any challenges.	Raj Darbhanga	From date of implementation and ongoing.

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.

The council recognises that this proposal will disproportionately impact on people with protected characteristics based on age, gender, disability, race and ethnicity but only in so far as these are the users of adult social care in the borough who are more likely to be older, female, disabled and from certain backgrounds.

The mitigating actions outlined above have been identified. The council recognises that the people who access the appointeeship service are vulnerable and factoring in consultation feedback, the council will not charge the fee to individuals who have £3000 or less in savings. This will ensure that people are not put at risk by the introduction of the fee.

In addition, the service will have the discretion to reduce or waive the fees for those who are unable to afford them. The service will also monitor the implementation of the fee.

The council will undertake appropriate due diligence to ensure, where clients and their representatives want to take back their appointeeship, that the client is not subject to or at risk of being subjected to financial abuse or put at risk because of a lack of support to meet their financial commitments, in line with our safeguarding duties.

People will have the right to make a complaint if they believe that the fee has been applied incorrectly or unfairly.

6 c) Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented:

Equality profile of those receiving the service will be monitored to identify if there any disproportionate impacts.

7. Authorisation

EqlA approved by Date 1st November 2019



.....
(Assistant Director/ Director)

8. Publication

Please ensure the completed EqlA is published in accordance with the Council's policy.

Please contact the Policy & Strategy Team for any feedback on the EqlA process.

Appendix 1:

Table A

LA Name	Charge for DWP Appointeeship	Details of Charge
Enfield	Yes	3.5% under 16K and £650 per year for above £16k
Bromley	Yes	Charge £775 for first year £650 for second year and subsequent years For balances below £16K then 3.5% charged on balance held.
Croydon	Yes	Charge £775 for first year £650 for second year and subsequent years For balances below £16K then 3.5% charged on balance held.
Camden	No	N/A
Islington	No	N/A
Hackney	No	N/A
Waltham Forest	No	N/A
Ealing	No	N/A
Reading		Charge £775 for first year £650 for second year and subsequent years For balances below £16K then 3.5% charged on balance held.
Hertfordshire County Council	Yes	Use bands 1 to 5: 1. £0 to £500 No charge 2. £501 to £2,999.99 Charge -- £50 per year 3. £3,000 to £9,999.99 Charge - £260 per year (£5 per week) 4. £10,000 to £15,999.99 Charge - 3% of cash funds held 5. £16,000 + Charge - £585 per year
Huddersfield	Yes	£10 per week for non-residential clients and £5 per week for residential clients. Clients with assets below £1K are not charged.
Nottingham	Yes	Charge £12.00 every four weeks based on a full assessment of what the service costs the council to run.
Buckinghamshire	Yes	£2.50 per week

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Report for: Cabinet 12 November 2019

Title: Community Infrastructure Levy (CIL) Partial Review: Draft Charging Schedule (DCS) consultation

Report Authorised by: Dan Hawthorn, Director of Housing, Regeneration & Planning

Lead Officer: Rob Krzyszowski, Head of Planning Policy, Transport & Infrastructure

Ward(s) affected: All

Report for Key/ Non Key Decision: Key

1 Describe the issue under consideration

- 1.1. The Community Infrastructure Levy (CIL) is a charge based on the floorspace of new buildings to help fund infrastructure needs arising from new development. When deciding CIL rates, an appropriate balance must be struck between additional investment to support development and the potential effect on the financial viability of developments. The rate proposed by the Council must therefore be based on robust evidence which examines the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area. This means that CIL rates vary across different areas of the borough to reflect the different financial value of development across the borough – but it should be noted that CIL raised in any part of the borough can generally be spent in any part of the borough based on infrastructure need. Proposed rates are subject to approval by an independent examiner.
- 1.2. Haringey Council started charging the Mayor of London's Community Infrastructure Levy (Mayoral CIL) in April 2012, for which the money collected is passed to Transport for London to help fund Crossrail 1 'the Elizabeth Line'. The Council approved the introduction of its own CIL in July 2014 and started charging it on 1 November 2014, for which the money collected may be spent on 'infrastructure' and a proportion on neighbourhood projects.
- 1.3. In 2016 a review of Haringey's CIL rates was initiated. The Council commissioned updated viability evidence which indicated that there was potential to increase CIL rates in the south east of the borough. Cabinet subsequently endorsed a partial review of the Council's CIL Charging Schedule and a Preliminary Draft Charging Schedule (PDCS) was published for consultation in March 2017. This proposed an increase to the Council's adopted (2014) CIL rate for residential development in the south-eastern part of the borough. The rest of the Charging Schedule remained unchanged.

- 1.4. One of the representations received through the consultation identified that the imposition of a higher CIL rate would significantly impact on three strategic development sites in Tottenham Hale that had outline planning permission and would undermine the delivery of affordable housing that had been agreed on the sites. As a result, Cabinet agreed in October 2017 to defer consultation on the Draft Charging Schedule (DCS) until such time as its publication would not put known development within Tottenham Hale at viability risk.
- 1.5. The Council has now determined reserved matters applications on the three strategic development sites in Tottenham Hale and issued CIL liability notices based on the adopted (2014) CIL rates. As the viability risk has now been mitigated it is considered appropriate to move forward with a partial review of the Council's CIL Charging Schedule.
- 1.6. In early 2019 the Council commissioned specialist consultants BNP Paribas Real Estate to update viability evidence in relation to the CIL rates in the east of the borough. This work took account of the update to Appendix C 'Affordable and Specialist/Supported Housing Guidance' of the Council's Housing Strategy which was approved in February 2019. The Council's adopted planning policy sets out that the Council's preferred types of affordable housing will be set out in its Housing Strategy so the change to Appendix C therefore represents a change to the Council's policy. The update alters the Council's preferences for lower-rent affordable housing tenures and affects the financial viability of developments so must therefore be taken into consideration in the assessment of how much CIL can viably be charged.
- 1.7. Having regard to the updated viability evidence, a Draft Charging Schedule has been prepared for public consultation. This sets out the proposed changes to the Council's CIL rates in the east of the borough. The key change is an increase in the residential CIL rate from £15 per square metre to £50 per square metre. The increased CIL rate of £50 per square is considered to strike an appropriate balance between raising additional investment to support development and the potential effect on the viability of developments. Increasing the rate beyond £50 per square metre would potentially threaten the ability of the Council to secure its preferred affordable housing tenures while a lesser increase would not maximise financial contributions from development towards infrastructure. The Draft Charging Schedule also proposes an increase in the CIL rate for student accommodation from £15 per square metre to £85 per square metre. In addition, it introduces CIL charges for two new specialist housing uses which are Build to Rent at a rate of £100 per square metre and warehouse living at £130 per square metre.
- 1.8. This report provides an update on the Haringey CIL; sets out the next steps for the partial review of the Council's CIL Charging Schedule; and seeks Cabinet's approval to: publish the Draft Charging Schedule and associated evidence base documents for public consultation; give delegated authority to the Director for Housing, Regeneration and Planning to finalise and approve the proposed Submission documents, in consultation with Cabinet Member for Climate Change and Sustainability, including any proposed modifications to the Submission documents arising from consultation; and submit the Draft Charging Schedule, the Council's responses to the representations submitted, and the necessary procedural and evidence base documentation for examination.

2 Cabinet Member Introduction

- 2.1 The Community Infrastructure Levy (CIL) is a charge based on the floorspace of new buildings to help fund infrastructure needs arising from new development. CIL can generally be spent in any part of the borough.
- 2.2 CIL rates are calculated based on financial viability of development. As financial values of development are different across Haringey CIL rates vary geographically to reflect this. Financial values are also why affordable housing has a big impact on CIL rates. While a private home and a social rented home cost broadly the same amount for a developer to build, a developer can sell a private home for a greater price than a social rent home. This means that the more affordable housing the council seeks and the more affordable the tenures are for residents, the lower the financial value of development to a developer and the less money that is available to contribute towards CIL.
- 2.3 This report proposes to increase CIL rates levied by the Council in the east of the borough for residential development, build to rent and student accommodation. It also proposes to introduce a new rate for warehouse living. Until now, the CIL rate for residential development in the east of the borough has been extremely low at £15 per square metre. This report proposes increasing it to £50.
- 2.4 In setting CIL rates the Council is required by national guidance to strike a balance between investment to support development and the potential effect on the financial viability of developments. A comprehensive review has been carried out to decide how much to increase CIL rates in the east of the borough. The proposed rates maximise financial contributions from development towards infrastructure whilst ensuring the economic viability of development and protecting the Council's ability to secure its preferred affordable housing tenures as part of new development.
- 2.5 The proposed rates are set out in a Draft Charging Schedule for consultation. They are subject to approval by an independent examiner.

3 Recommendations

- 3.1 That Cabinet:
- 1) Notes that following the clarifications set out in Section 8 the proposals were endorsed by Regulatory Committee for approval by Cabinet without any changes for consideration
 - 2) Notes the update on the Haringey CIL;
 - 3) Notes the next steps outlined in the report for the partial review of the Council's CIL Charging Schedule;

- 4) Approves for public consultation, in accordance with Regulation 16 of the CIL Regulations 2010, the following Proposed Submission documents, prior to their submission for examination:
 - the Haringey CIL Draft Charging Schedule (Appendix B) as revised and updated from the Preliminary Draft Charging Schedule;
 - Community Infrastructure Levy: Eastern Haringey Viability Update Study prepared by BNP Paribas (October 2019) (Appendix C)
- 5) Delegates authority to the Director for Housing, Regeneration and Planning, following consultation with the Cabinet Member for Climate Change and Sustainability, to finalise and approve the Proposed Submission documents (as set out in recommendation 4), in accordance with section 212 of the Planning Act 2008 and Regulation 19 of the CIL Regulations 2010 (as amended) for submission for examination, including to:
 - (i) make modifications to the Submission documents arising from consultation and throughout the examination, including undertaking any necessary further consultation, to ensure the legal requirements are met;
 - (ii) submit the Draft Charging Schedule, the Council's responses to the representations submitted to the Draft Charging Schedule, and the necessary procedural and evidence base documentation, together with any proposed modifications;

4 Reasons for decision

- 4.1 In October 2017 Cabinet agreed to pause a partial review of the Council's CIL Charging Schedule to ensure that known development within Tottenham Hale was not put at viability risk. The known developments have now been issued with CIL liability notices and consequently the viability risk to them from a change in CIL rates has been mitigated. It is therefore considered appropriate to move forward with a partial review of the Council's CIL Charging Schedule. Specialist consultants BNP Paribas were commissioned to update the Council's viability evidence in relation to CIL rates in the east of the borough. Having regard to the updated viability evidence and BNP Paribas' consequent recommendations, a Draft Charging Schedule has been prepared for consultation setting out the proposed changes to CIL rates in the Eastern Charging Zone. Following consultation, the next step towards implementation of the revised rates will be to submit the Draft Charging Schedule and associated documentation for examination.

5 Alternative options considered

- 5.1 The alternative options considered are:
 - Option 1 – To cancel the partial review. The advantage of this is it would not prejudice or restrict new affordable housing planning policies for the emerging new Local Plan and lower-rent tenures could be maximised. The disadvantage would be that CIL rates and therefore the amount of financial contributions from

developers for infrastructure would remain the same and may not be maximised.

- Option 2 – To publish a Draft Charging Schedule not taking into account the new Appendix C of the Council's Housing Strategy. The advantage of this is that CIL rates and therefore the amount of financial contributions from developers for infrastructure would be higher than if the new Appendix C were taken into consideration. The disadvantage would be that the CIL rates would not be set in accordance with the latest Council preferences for lower-rent affordable housing tenures, there would be a risk that the Draft Charging Schedule would be found unsound at examination, and the increased CIL rates would prejudice and restrict new affordable housing planning policies for the emerging new Local Plan.
- Option 3 – To publish a Draft Charging Schedule, taking into account the new Appendix C of the Council's Housing Strategy. The advantage of this is that CIL rates and therefore the amount of financial contributions from developers would be increased but not to a level that would be incompatible with the latest Council preferences for lower-rent affordable housing tenures or that would significantly prejudice and restrict new affordable housing planning policies for the emerging new Local Plan. The disadvantage would be that CIL rates and therefore the amount of financial contributions from developers would not be as high as for Option 2.

5.2 Option 3 is being recommended as it will set an appropriate balance between the rates of CIL to pay for infrastructure required to support the development of the borough and the economic viability of development proposals with the same.

6 Background information

Haringey Local Plan

6.1 Haringey's Local Plan makes provision for a minimum of 19,802 homes and an additional 23,800m² employment floorspace over the period 2013 to 2026. This growth will result in increased pressure on local infrastructure, services and facilities, creating demand for new or enhanced provision. The Council and developers have a responsibility through the planning process to manage the impact of this growth, ensuring that any harm caused by development is mitigated and that the necessary infrastructure is provided.

6.2 The Infrastructure required to support this growth has been identified in the Council's Infrastructure Delivery Plan (April 2016) (the '2016 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. Section 106 agreements / planning obligations (site/development related)
- CIL (strategic and borough-wide infrastructure)

Community Infrastructure Levy (CIL)

- 6.3 CIL is a levy introduced under the Planning Act 2008 that local authorities can choose to charge on new developments in their area for the purpose of raising funds for the wide range of community infrastructure projects required to support area development¹. It provides local authorities with an additional means of securing infrastructure contributions from developers. As set out in paragraph 5.2, new development is already required to contribute to site related and wider infrastructure needs through a combination of planning conditions and planning obligations. The Council has existing planning policies to secure things like play space on site and the Council seeks to use Section 106 and Section 278 agreements to secure other directly relevant contributions including highways improvements. The Council also makes use of any other available opportunities to help pay for infrastructure, for example by securing a GLA Housing Zone designation in Tottenham Hale which has helped fund certain infrastructure items needed to support new development.
- 6.4 CIL is set through the adoption of a Charging Schedule produced in accordance with the relevant Local Plan and using the procedure set out in the Planning Act 2008 and the CIL Regulations 2010 (the 'CIL Regulations') (as amended). The CIL Regulations 2010 (regulation 14) require that in setting rates a charging authority must strike an 'appropriate balance' between:
- a) the desirability of funding from CIL (in whole or in part) the actual and expected estimated total cost of infrastructure required to support the development of its area, taking into account other actual and expected sources of funding; and
 - b) the potential effects (taken as a whole) of the imposition of CIL on the economic viability of development across its area.
- 6.5 In setting rates, a charging authority must take into account the rates set for the Mayoral CIL (see below).
- 6.6 As to the meaning of an 'appropriate balance', the Government's Planning Practice Guidance ('PPG') on CIL sets out that the levy is expected to have a positive economic effect on development across a Local Plan area. When deciding the CIL rates, an appropriate balance must be struck between additional investment to support development and the potential effect on the viability of developments (PPG, paragraph 010). In meeting the regulatory requirements, charging authorities should be able to show and explain how their proposed CIL rate (or rates) will contribute towards the implementation of their relevant plan and support development across their area. In doing so, charging authorities should use evidence in accordance with PPG and take account of national planning policy on development contributions.

¹ 15% of CIL must be set aside to be spent on neighbourhood projects determined in consultation with the community, known as 'Neighbourhood CIL'. The Council ran a consultation in late 2018 seeking feedback about how this set amount should be spent. A further consultation will be undertaken later in 2019 / early 2020.

- 6.7 As part of the CIL process, the charging authority must establish the total cost of the infrastructure projects they wish to fund wholly or partly through CIL. In doing so, they must consider (i) what additional infrastructure is required to support development in their area (as identified in the relevant infrastructure assessment) and (ii) what other sources of funding are available based on appropriate evidence. The charging authority will then need to determine the size of its infrastructure funding gap (i.e. known/expected infrastructure costs – other possible sources of funding those costs) based on which a CIL funding target can be established. It is the identification of the funding gap which evidences the need to put the CIL in place (PPG, paragraph 017).
- 6.8 The PPG requires that information on infrastructure needs should be drawn from the infrastructure assessment that was undertaken as part of preparing the Council's Local Plan (paragraph 17). The Council's adopted Local Plan was supported by the IDP 2016, which identifies an expected funding gap to 2026/27 of £348.6 million) (section 13) and lists the prices and potential funding sources, including CIL, for the list of necessary infrastructure projects (section 14). The IDP dates to 2016 and is considered to be up to date. As such it is not deemed necessary to re-do or update the infrastructure evidence in support of CIL, which was tested at examination two years ago and found to be sound. The 2016 IDP states that it was expected a formal update of the IDP would take place to support the updating of the Council's CIL. This has not taken place and instead it is proposed the update will take place in support of the Council's emerging new Local Plan. As set out above, it is considered that the 2016 IDP is sufficiently robust and up to date for the purpose of supporting the Council's partial review of the CIL Charging Schedule.
- 6.9 In order to assess the potential economic impact of the imposition of CIL, a viability assessment is required, using an area-based approach and informed by the appropriate available evidence. A charging authority's proposed rate(s) should be reasonable given the available evidence, but there is no requirement for it to exactly mirror the evidence. There is room for some pragmatism. It would be appropriate to ensure that a 'buffer' or margin is included, so that the CIL rate is able to support development when economic circumstances adjust. In all cases, the charging authority should be able to explain its approach clearly (PPG, 020).
- 6.10 The CIL Regulations allow charging authorities to apply differential rates to help ensure the viability of development is not put at risk (regulation 13). However, differences in rates need to be justified by reference to economic viability of development, not on the basis of delivering policy objectives (PPG, 022). Charging authorities may wish to consider how any differential rates appropriately reflect the viability of the size, type and tenure of housing needed for different groups in the community and should consider the views of developers at an early stage. In setting differential rates, the charging authority must ensure their Charging Schedules are state aid compliant.
- 6.11 The procedure for reviewing an existing CIL Charging Schedule is the same as producing a new one and is governed by the Planning Act 2008 and the CIL Regulations. The achievement of the appropriate balance by the charging authority in setting its CIL rates is tested through an examination of the

proposed Charging Schedule by an independent examiner, following consultation.

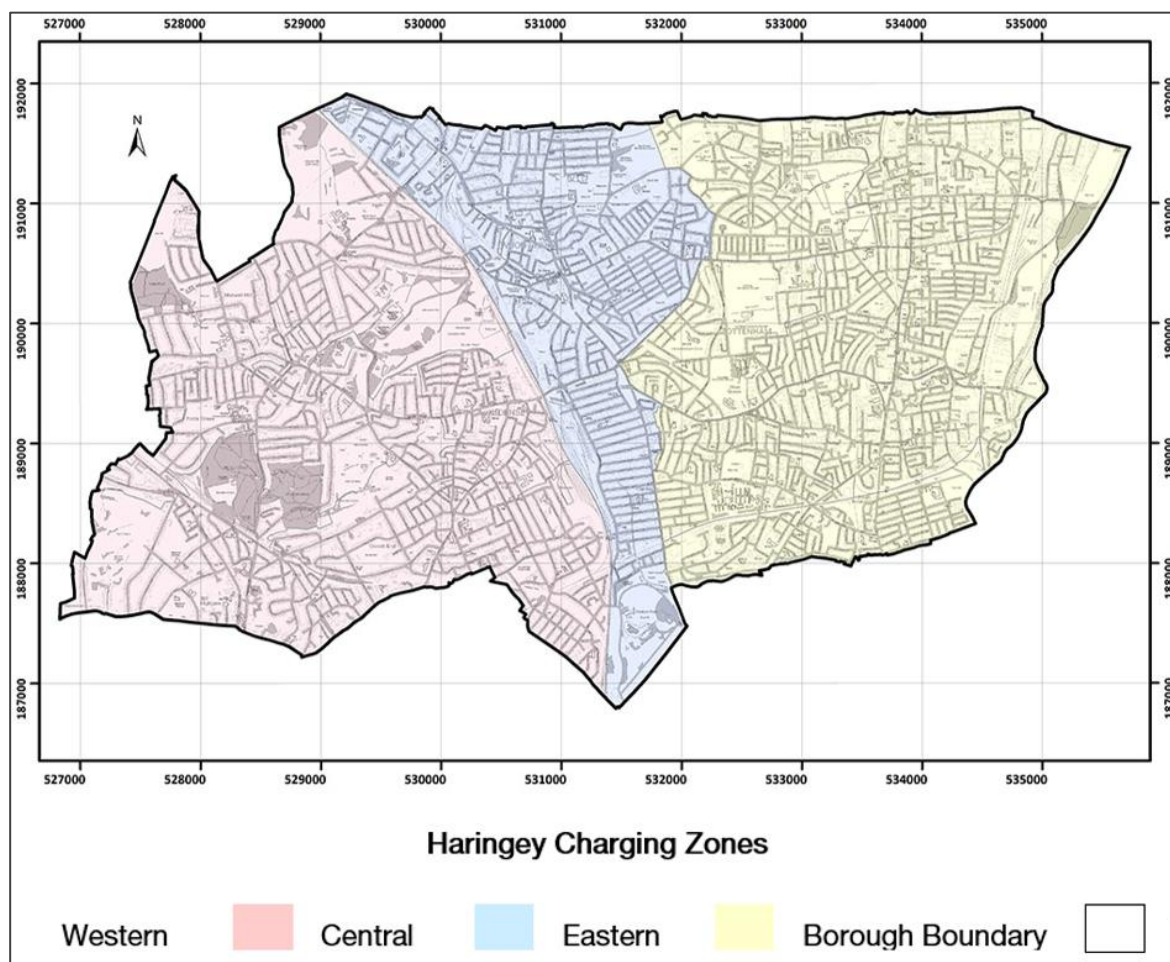
Haringey CIL

6.12 The Council approved the introduction of a local CIL in July 2014 and started charging on 1 November 2014. The rates together with the map showing the different charging zones are set out in the Council's existing adopted CIL Charging Schedule (Appendix A). The adopted rates are as follows:

Table 1: Adopted CIL Charging Schedule for Haringey

Adopted CIL Charging Schedule for Haringey			
	CIL charge (£/square metre)		
Use	Western	Central	Eastern
Residential	£265	£165	£15
Student accommodation	£265	£165	£15
Supermarkets	£95		
Retail Warehousing	£25		
Office, industrial, warehousing, small scale retail (use class A1-5)	Nil Rate		
Health, school and higher education	Nil Rate		
All other uses	Nil Rate		

6.13 The map of the three geographical zones (Western, Central and Eastern) is shown below:



6.14 CIL charging rates are subject to annual indexation therefore the current rates charged by the Council are higher than the adopted rates in Table 1. As of the April 2019 the inflation multiplier was 1.242 (equating to +24%).

6.15 As at 31 March 2019 the Council had collected £8.5m in local CIL. This is broken down as follows:

Table 2: Local CIL Collected

Year	Haringey CIL collected	Total CIL collected
2015/16	£764,856.73	£8,521,394.31
2016/17	£1,904,625.21	
2017/18	£1,887,688.21	
2018/19	£3,964,224.16	

7 Partial Review of the CIL Charging Schedule

Initiation of Partial Review

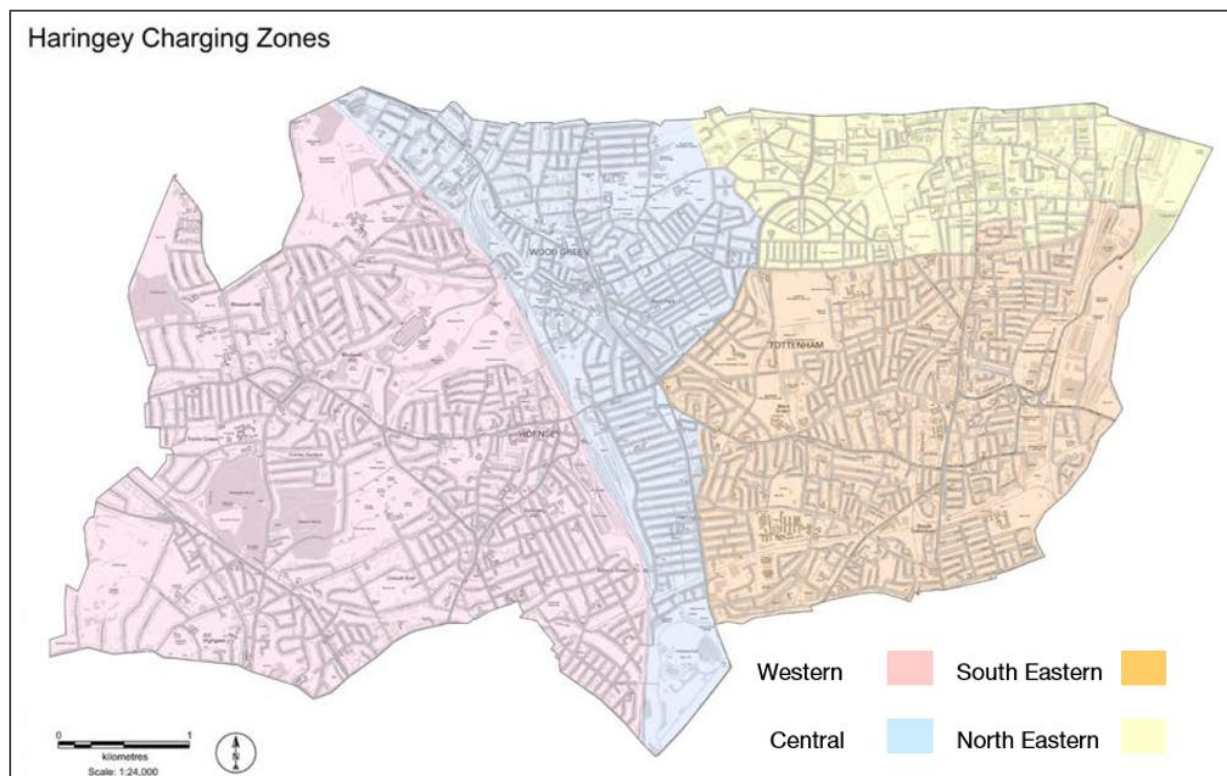
7.1 In 2016 the Council initiated a review of its adopted CIL rates. Specialist consultants BNP Paribas prepared updated viability evidence for the Council which indicated that there was potential to increase CIL rates in the south east

of the borough. Cabinet subsequently endorsed a partial review of the CIL Charging Schedule and a Preliminary Draft Charging Schedule (PDCS) was published for consultation in March 2017. This proposed an uplift to the CIL that would be charged for residential development in the south east of the borough to be implemented via the creation of a new south-eastern charging zone for residential development. The rest of the Charging Schedule remained unchanged.

Table 3: Preliminary Draft Charging Schedule (red shows changes proposed in 2017 consultation)

Use	CIL charge (£/square metre)			
	Western	Central	<u>South Eastern</u>	<u>North Eastern</u>
Residential	£265	£165	<u>£130</u>	£15
Student accommodation	£265	£165	<u>£130</u>	£15
<u>Warehouse Living</u>	<u>N/A</u>	<u>N/A</u>	<u>£130</u>	<u>N/A</u>
Supermarkets	£95			
Retail Warehousing	£25			
Office, industrial, warehousing, small scale retail (use class A1-5)	Nil Rate			
Health, school and higher education	Nil Rate			
All other uses	Nil Rate			

7.2 The map of the four geographical zones (Western, Central and South Eastern and North Eastern) is shown below:



- 7.3 The Council received 15 written responses during the consultation. There were a number of objections from developers in relation to the proposed increase in CIL in the south-eastern charging zone. One of the representations raised the issue that for outline applications the Council had already granted the new CIL rate would be applicable to subsequent reserved matters applications. The imposition of a higher CIL rate was identified as having potential to significantly impact on three strategic development sites in Tottenham Hale that had outline planning permission, principally by undermining the delivery of affordable housing that had been agreed on the sites. This would have led to the levels of affordable housing on these sites having to be revised and would have undermined the delivery of Local Plan and Housing Zone objectives.
- 7.4 Following legal advice, and upon being advised of the risk to affordable housing delivery, Cabinet agreed in October 2017 to defer consultation on the Draft Charging Schedule (DCS) until such time as its publication would not put known development within Tottenham Hale at viability risk. The Council has now determined reserved matters applications on the three strategic development sites in Tottenham Hale and issued CIL liability notices based on the existing adopted CIL rates. As the viability risk to the known developments from a change in CIL rates has been mitigated it is considered appropriate to move forward with the partial review.

Recommencement of Partial Review

- 7.5 The Eastern Haringey CIL Viability Update Study which supported the PDCS was finalised in December 2016. As it is close to three years old an update was commissioned to the study to establish whether the rates proposed in the PDCS are still viable. The updated study completed in October 2019, (published as Appendix C) reflects current values and costs for development and land. It also

contains other amended inputs which impact on development viability as set out in the following paragraphs.

- 7.6 Most new development in London is subject to Mayoral CIL (MCIL) which was introduced in April 2012. This is effectively 'top-sliced' from the local CIL rate and must be built into the viability analyses of individual boroughs. At the time Haringey adopted its CIL rates the MCIL for Haringey was £35 per sqm (with a nil rate for education and health). This rate remained in force when BNP Paribas prepared its December 2016 study (albeit the rate assumed for the appraisals was higher as indexation over the period 2012-2016 had increased MCIL to approximately £50 per sqm). In February 2019 the Mayor adopted a new Charging Schedule (MCIL2) which included an increased Mayoral CIL rate for Haringey of £60 per sqm. MCIL2 came into effect on 1 April 2019. In preparing its updated study BNP Paribas had to account for this increase in Mayoral CIL.
- 7.7 The study was prepared in line with the affordable housing policy framework in the Council's Local Plan. Policy SP2 of the Local Plan Strategic Policies document (adopted March 2013, with alterations July 2017) sets a borough wide affordable housing target of 40% and a tenure split delivery target of 60% affordable rent (including social rent) and 40% intermediate housing. The only exception to this is within the area covered by the Tottenham Area Action Plan (adopted July 2017) where a reversed tenure split target of 40% affordable rent (including social rent) and 60% intermediate housing applies. The policy framework of the Local Plan has not changed since the previous evidence was prepared. The Council has however adopted a revision to its Housing Strategy relating to its preferred affordable housing tenures. The Council's Development Management DPD requires that this revision is taken into account when making planning decisions.
- 7.8 In March 2019 the Council agreed and adopted a revised version of Appendix C to the Council's Housing Strategy 2017-22. This sets out an expectation that all new affordable homes being developed are affordable for Haringey residents. It sets out the Council's preference that new affordable housing should be developed by the Council itself or purchased by the Council from private developers and delivered as Council housing. Appendix C to the Housing Strategy also sets out that for general needs homes the Council has an explicit preference for social rent with rents at target rent levels, especially for Council rented homes at Council rents. It also sets out that the Council's preference for the Intermediate portion is for Discount Market Rent Housing at London Living Rent levels.
- 7.9 The affordable housing requirements which were tested in the development appraisals for the December 2016 study are not in line with the Council's current preferences as set out in Appendix C of the Housing Strategy. Officers therefore determined it necessary to consider the new requirements as part of an updated study. The purpose of this is to understand the impact the Council's new affordable housing guidance has upon development viability and the consequential CIL rates which can be levied on residential development without putting its delivery at risk.
- 7.10 BNP Paribas was instructed to test the four scenarios set out in the table below:

Table 4: Affordable housing scenarios tested by BNP Paribas in viability update

	Affordable housing scenario 1	Affordable housing scenario 2	Affordable housing scenario 3	Affordable housing scenario 4
Affordable Rent component	Affordable rent let at rents that do not exceed Local Housing Allowance rates	London Affordable Rent	Social Rent	Social Rent
Intermediate component	Shared ownership	Shared ownership	Shared ownership	Discount Market Rent

7.11 Scenario 1 is consistent with the December 2016 Study which informed the proposed rates in the Preliminary Draft Charging Schedule. It is based on the delivery of Affordable Rent (let at rents that do not exceed Local Housing Allowance rates) and Shared Ownership. Scenarios 2, 3 and 4 are newly tested. Scenario 2 is based on the delivery of London Affordable Rent which is let at rents set by the Mayor that are standard across London and Shared Ownership. Scenario 3 is based on the delivery of Social Rent (let at locally set rents) and Shared Ownership. Scenario 4 is based on the delivery of Social Rent (let at locally set rents) with the Intermediate component made up of Discount Market Rent (let at London Living Rent levels). Scenarios 2, 3 and 4 each accord with guidance provided in Appendix C of the Council's Housing Strategy. Scenario 4 best reflects the Council's preferred approach as set out in the document.

Conclusions of updated viability work and implications for revising CIL

- 7.12 As set out in section 5.4 of this report the CIL Regulations require that, in setting a charge, local authorities strike an appropriate balance between securing enough revenue to fund necessary infrastructure on the one hand and the potentially adverse impact of CIL upon the viability of development across the whole area on the other.
- 7.13 The updated viability work by BNP Paribas (Appendix C), finalised in October 2019, indicates that viability of residential development is currently challenging in certain locations and on certain types of development in the eastern part of the borough. Nevertheless, BNP Paribas considers that it is possible for the Council to continue to levy rates across the Eastern CIL Zone and increase the rates for residential development and student accommodation subject to allowing for an appropriate buffer to address risks to delivery.
- 7.14 Table 5 sets out BNP Paribas' recommended maximum CIL rates for residential development in the Eastern Charging Zone under the four affordable housing scenarios:

Table 5: BNP Paribas recommended maximum CIL charges allowing for buffer

	Recommended maximum CIL Charge for residential development
Scenario 1: Affordable Rent & Shared Ownership	£115
Scenario 2 London Affordable Rent and Shared Ownership	£115
Scenario 3 Social Rent and Shared Ownership	£65
Scenario 4 Social Rent and Discount Market Rent	£50

- 7.15 PPG on viability is clear that viability assessments should take account of all relevant policies, and local and national standards, including Section 106 planning obligations. Scenario 1 is not representative of the Council's latest preferred approach to delivering affordable housing and therefore the results from the modeling of Scenario 1 are not considered appropriate to underpin the setting of revised CIL rates. It is considered that Scenarios 2 and 3 are generally appropriate in the context of the current guidance position. The Council has set a preference for Scenario 3 (Social Rent), however Scenario 2 (London Affordable Rent) reflects the main low cost affordable rented housing that the GLA expects to fund so is generally preferred by Registered Providers. The evidence indicates that the viable CIL rate for Scenario 2 is £115 per sqm. The evidence indicates that the viable CIL rate for Scenario 3 is £65 per sqm. Scenario 4 is most appropriate in the context of the current policy position best reflecting the Council's requirements for affordable housing delivery. The evidence indicates that the viable CIL rate for Scenario 4 is £50 per sqm.
- 7.16 Having regard to the Council's affordable housing policy preferences discussed above and in light of the maximum CIL charges set out in Table 5, BNP Paribas recommend that the Council consider introducing a flat rate charge of £50 per sqm for residential development in the Eastern Charging Zone. Increasing the proposed charge beyond this level would require a policy trade off to be made. The only way to achieve a higher CIL without making development unviable would be for the Council to seek a different affordable housing tenure mix or to accept a reduced overall quantum of affordable housing (e.g. lower than the borough wide target of 40%).
- 7.17 Officers support the recommendation of BNP Paribas and recommend the introduction of a flat rate of £50 per sqm for residential development in the Eastern Charging Zone. This would represent an increase of £35 per sqm versus the current adopted charge of £15 per sqm. The CIL increase would apply to all wards in the Eastern Charging Zone. BNP Paribas' December 2016 study indicated that there was no potential to increase the residential CIL rate in White Hart Lane and Northumberland Park wards. Since that time, however, sales values have increased such that an increased residential CIL rate in these wards would be economically viable.

- 7.18 As part of its update BNP Paribas also analysed the viability of student accommodation in the Eastern Charging Zone. The results indicated that there is potential to increase the charge from the current adopted rate of £15 per square metre to £85 per square metre.
- 7.19 BNP Paribas also tested two specialist housing uses. It was found that purpose built private rented sector (PRS) schemes (referred to as “Built to Rent” in the Draft London Plan) can sustain a higher charge than standard residential development. BNP Paribas recommend that the Council introduces a new rate of £100 per square metre for PRS. The viability update also considered the viability of “warehouse living”, a specialist housing use which is found in some parts of the east of the borough. BNP Paribas recommend that the Council introduces a new rate of £130 per square for warehouse living (in line with what was proposed in the PDCS).
- 7.20 In light of the updated viability evidence and having regard to the relevant legal tests and national guidance, officers consider that the following amendments to the Council’s Charging Schedule are justified:
- 1) Increasing the residential rate in the Eastern Charging Zone from £15 per sqm to £50 per sqm;
 - 2) Increasing the student accommodation rate in the Eastern Charging Zone from £15 per sqm to £85 per sqm;
 - 3) Including a new “Built to Rent” use in the Charging Schedule which would be subject to a charge of £100 in the Eastern Charging Zone (the Built to Rent rate in the Western and Central Charging Zones will be amended so that it is in line with the existing residential rate for those zones).
 - 4) Including a new “warehouse living” use in the Charging Schedule which would be subject to a charge of £130 per sqm in the Eastern Charging Zone (it is not applicable to other charging zones so the rate there would be nil).
- 7.21 Officers recommend this approach would accord fully with the CIL Regulations 2010, in particular Regulation 14 which requires local authorities setting CIL rates to strike an appropriate balance between securing enough revenue to fund necessary infrastructure on the one hand and the potentially adverse impact of CIL upon the viability of development across the whole area on the other. This approach would also accord with the PPG on differential rates being justified on the basis of economic viability.
- 7.22 Whilst the setting of higher CIL rates in some wards could potentially be justified, setting CIL at the limit of viability is not recommended. The effect of this would be put the viability of new development at risk and it would likely make it more difficult for the Council to secure a policy compliant level of affordable housing. It is also important that the revised CIL rates are not set at a level which would prejudice or restrict new affordable housing policies for the emerging new Local Plan. Setting CIL rates at the limit of viability could limit the scope of future new policy.

Implications of implementing proposed revised CIL rates

- 7.23 The proposed residential charge of £50 per sqm in the Eastern Charging Zone is a £35 per sqm increase on the current charge of £15 per sqm (£18.63 when indexation is applied) and would result in an increase in CIL receipts versus what would be collected if the current adopted rate was retained.
- 7.24 The PDCS which the Council consulted on in early 2017 proposed a CIL rate of £130 per sqm for residential development in the south of the Eastern Charging Zone. It did not propose any change to the CIL rate in the north of the Eastern Charging Zone (comprising White Hart Lane and Northumberland Park wards). Based on these charges and development anticipated in the period 2018 to 2026, the PDCS estimated this would generate CIL revenues of £18.79 million. The current recommended rate of £50 per sqm across the entire Eastern Charging Zone would result in a reduction of CIL revenues of approximately half versus the estimate in the PDCS.
- 7.25 It is important to note that it is very difficult to forecast CIL receipts as this is entirely dependent on planning applications being submitted, approved, development commenced and certain triggers being met, such as commencement on site, with a wide range of factors outside of the control of the Council influencing this. Particularly, the wider economy and development and construction industry factors play a big role. Contributions can vary from very small to very large across different development sites meaning that forecasts can be 'lumpy', volatile and be significantly impacted by one or two small changes.

8 Regulatory Committee Comments

- 8.1 The proposals which are the subject of this report were considered by Regulatory Committee on 15 October 2019. The following points were raised and discussed before the proposals were endorsed by Regulatory Committee for approval by Cabinet without any changes for consideration:
- Committee identified an error on page 5 of Appendix C relating to the proposed student accommodation rate. This was noted by officers and has subsequently been corrected within Appendix C of this report.
 - Committee asked which planning permissions the proposed new rates would apply to. Officers advised that the new rates would apply to permissions applied for from the date of implementation – it would not affect developments where permission had already been granted.
 - Committee asked what the implications would have been of increasing the residential CIL rate in 2017 rather than putting the Partial Review on hold. Officers advised that increasing the rate in 2017 would have resulted in issues with approvals for outline planning applications, as viability assessments would have been calculated based on the old CIL rate. An increase in the CIL rate would have resulted in a loss of affordable housing for the Hale Wharf and Ashley Gardens developments
 - Committee discussed rates charged in neighbouring boroughs and whether these were comparable. Officers advised that residential CIL rates between boroughs are not directly comparable because each borough has their own affordable housing policy and this has an impact on the residential CIL rate which is financially viable.

- Committee asked about the consultation on the Draft Charging Schedule. Officers advised that consultation would be targeted at the Planning Policy database. Committee was advised to expect that that developers would consider that the proposed residential rate was set too high, but unless alternative evidence could be provided, officers felt that the Council was in a good position to present the proposed rate at examination stage.
- Committee asked about spending of CIL and the arrangements around this. Officers explained there would be other consultations on neighbourhood CIL spending, separate to the Draft Charging Schedule consultation.

9 Next Steps

9.1 The process for reviewing a CIL Charging Schedule is set out in the CIL Regulations 2010. The following table sets out an indicative timetable for proceeding with the partial review:

Table 6: Milestones for partial review of Haringey CIL

Milestones for partial review of the CIL Charging Schedule	
Task	Completion Date
Draft Charging Schedule approved by Cabinet	November 2019
Draft Charging Schedule Consultation	December 2019 – January 2020
Submission for Examination	Early 2020
Examination Hearing	Spring 2020
Inspector's Report	Summer 2020
Approval of Charging Schedule at Full Council	Autumn 2020
Publication and effect of revised CIL Charging Schedule	Early 2021

9.2 As set out in Table 6 the next stage in the partial review is the publication of a Draft Charging Schedule for consultation. A Draft Charging Schedule has been prepared in this regard incorporating the proposed rate changes set out in Section 6 of this report (Appendix B). The proposed charges in the Draft Charging Schedule are set out below.

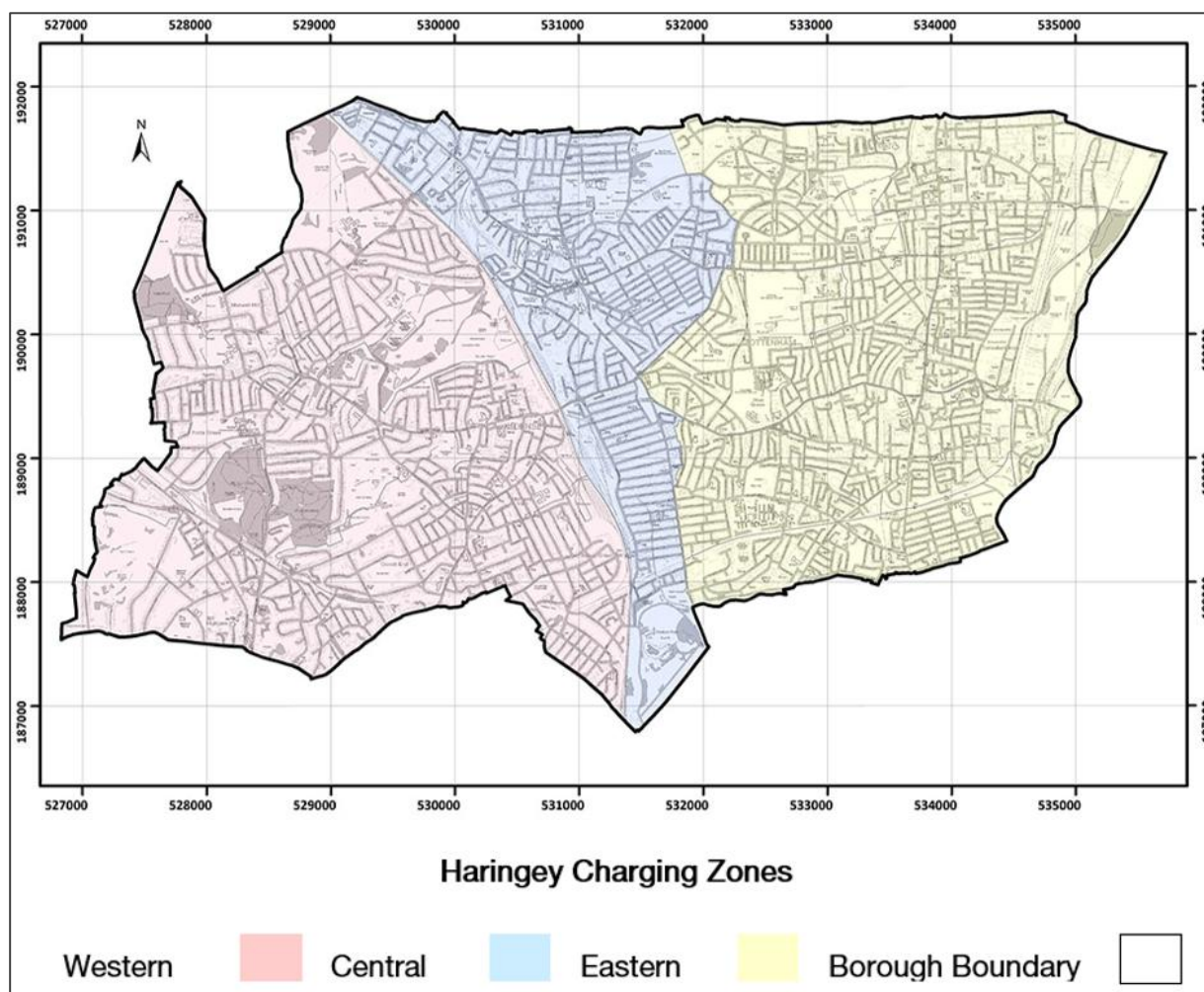
Table 7: Proposed Draft Charging Schedule (red shows changes proposed for 2019 consultation)

Use	CIL charge (£/square metre)		
	Western	Central	Eastern
Residential	£265*	£165*	£15 £50
Student accommodation	£265*	£165*	£15 £85
<u>Build to Rent housing</u>	<u>£265*</u>	<u>£165*</u>	<u>£100</u>

<u>Warehouse Living</u>	<u>Nil Rate</u>	<u>Nil Rate</u>	<u>£130</u>
Supermarkets	£95*		
Retail Warehousing	£25*		
Office, industrial, warehousing, small scale retail (use class A1-5)	Nil Rate		
Health, school and higher education	Nil Rate		
All other uses	Nil Rate		

*Rates that are not amended as part of the Partial Review of the CIL Charging Schedule in 2019/20 will be indexed for inflation in accordance with the CIL Regulations 2010 (as amended) based on the date of their original effect in the original CIL Charging Schedule (November 2014) to the date of final approval (expected 2020/21). The updated indexed figures will be provided as part of the final reviewed CIL Charging Schedule at the point of final approval (expected 2020/21) rather than in this Draft Charging Schedule document.

9.3 The map of the three geographical zones (Western, Central and Eastern) is shown below:



- 9.4 The Haringey CIL Draft Charging Schedule (Appendix B) as revised and updated from the Preliminary Draft Charging Schedule and the Community Infrastructure Levy: Eastern Haringey Viability Update Study prepared by BNP Paribas (October 2019) (Appendix C) is to be published for public consultation. The Council will also publish a Statement of Representations Procedure, the IDP Update 2016 and any other procedural documentation required.
- 9.5 The CIL Regulations 2010 set out how the Council should consult on a Draft Charging Schedule (Regulations 16 and 17). The minimum requirement is for 4 weeks of consultation, however in line with good practice and consistent with the Council's Statement of Community Involvement it is proposed that the consultation runs for at least 6 weeks. Subject to Cabinet approval, this is proposed to take place from December 2019.

10 CIL Spending

- 10.1 While the spending of CIL is not the subject of this report and does not form part of the recommendations, a summary is given below as to how CIL must be spent and the local approach that is being taken to funding specific projects. As set out in paragraph 5.15 of this report, as at 31 March 2019 the Council had collected £8.5m in local CIL. CIL therefore provides an important source of

funding towards a wide range of community infrastructure projects required to support area development.

10.2 The Planning Act 2008 (as amended) and CIL Regulations (as amended) set out how CIL can be spent:

- Up to 5% of CIL may be spent on the administrative expenses incurred by the Council in administering the collecting and spending of CIL.
- 15% of CIL must be spent on 'Neighbourhood CIL' (NCIL) projects, that is projects identified in consultation with local neighbourhoods. The 15% figure increases to 25% where there is an adopted Neighbourhood Plan.
- The remaining 70-80% of CIL may be spent on 'Strategic CIL' (SCIL) projects.

Strategic CIL (SCIL)

10.3 The CIL Regulations 2010 (as amended) require that CIL must be spent on "funding the provision, improvement, replacement, operation or maintenance of infrastructure to support the development of its area" (Regulation 59). It is important to note that Charging authorities may not use the levy to fund affordable housing.

10.4 The process for spending Strategic CIL is set out in the Haringey CIL Charging Schedule on the CIL webpage at www.haringey.gov.uk/cil. This states that "CIL revenue will be spent on infrastructure needed to support development in Haringey. This need is assessed as part of the Local Plan making process and an Infrastructure Delivery Plan is included in the adopted Local Plan: Strategic Policies. This infrastructure needs and delivery plan are updated regularly."

10.5 The Charging Schedule sets out in Table 3 Haringey's Regulation 123 List, which essentially sets out what SCIL may be spent on, as follows:

- Educational Facilities
- Further Education Facilities
- Health and wellbeing Facilities
- Parks and Open Spaces
- Social and Community Facilities
- Transport and Highways (excluding works that are required as part of a development proposal to be secured through a Section 278 Agreement)
- Enterprise Space
- Sports and Leisure Facilities
- Public Realm Improvements
- Community Safety Measures
- District Energy Network and associated infrastructure

10.6 The Governance document states (page 9) that the Strategic Proportion of CIL will be spent on CIL eligible projects within the Capital Programme taking into account the Regulation 123 List and the IDP.

Neighbourhood CIL (NCIL)

- 10.7 Legislation requires NCIL to be spent on “infrastructure” or what is known as ‘Neighbourhood CIL’ (NCIL) projects which can be “anything else that is concerned with addressing the demands that development places on an area”.
- 10.8 15% of CIL must be spent on NCIL projects, that is projects identified in consultation with local neighbourhoods. The 15% figure increases to 25% where there is an adopted Neighbourhood Plan which is currently only the case in the Highgate Neighbourhood Plan area in the borough at the moment, although there are emerging Neighbourhood Plans at Crouch End and Finsbury Park and Stroud Green.
- 10.9 The process for spending Neighbourhood CIL is set out in the Governance document on the CIL webpage at www.haringey.gov.uk/cil. A consultation on NCIL was undertaken from October to November 2018 and 551 comments were received. A further consultation will take place in late 2019 / early 2020 to narrow down all the potential projects and there will be engagement with relevant service departments (who would deliver the projects) and ward members too. Projects can then be commissioned and delivered by the relevant Council service.

CIL spend reporting and CIL spend to date

- 10.10 The Council reports on CIL collection and spend in the Authority Monitoring Report every year in December for the previous financial year. The only CIL that has been spent so far is £1.9m for Bounds Green Primary School in 2016.

11 Contribution to strategic outcomes

- 11.1 Priority 3 (Place): CIL helps fund local and strategic infrastructure projects which are necessary to ensure that the growth in the borough is something that everyone can benefit from and produces sustainable, attractive and accessible places.
- 11.2 Priority 4 (Economy): CIL receipts are a key source of funding to support the delivery of local physical and social infrastructure.

12 Statutory Officer comments (Comments of Chief Financial Officer (including procurement), Assistant Director of Corporate Governance, Equalities)**Finance**

- 12.1 The recommendations in this report do not require any funding as the existing staff resource is being utilised to progress the partial review. There will be a potential increase in CIL income which would result in additional income to the authority.

Procurement

12.2 There are no procurement implications arising from this report.

Legal

12.3 The Assistant Director of Corporate Governance has reviewed and noted this report.

12.4 Cabinet is authorised under Article 7.03 of the Council's Constitution to carry out the Council's executive functions. The law does not specify that the approval of a local authority's CIL Charging Schedule is a function that cannot be the responsibility of an authority's executive and so Cabinet can authorise the consultation regarding the Haringey CIL Draft Charging Schedule.

12.5 The Council's Constitution does, however, provide in Article 4.02 and Part Three that the approval of the Council's CIL Charing Schedule shall only be exercised by Full Council and so following receipt of the independent examiner's report approval will need to be sought from Full Council for the Charging Schedule.

12.6 The partial review must be carried out in accordance with the Planning Act 2008 and the CIL Regulations 2010 (as amended). The applicable legal tests and Government Guidance to be followed by the Council when carrying out the review process is comprehensively summarised in section 5 of this report.

Equality

12.7 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.

12.8 The three parts of the duty apply 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.

12.9 An increase in the CIL rate for residential development in the east of the borough has the potential to put the delivery of housing and affordable housing at risk. As affordable housing is more likely to represent a singular viable housing option for individuals and groups with protected characteristics this risk has potential equalities implications. However, by setting the CIL rates based on the viability of development, any risk to affordable housing delivery is minimised. It is noted that the viability analysis accords with the guidance in Appendix C of the Council's Housing Strategy relating to lower rent affordable housing. The increase in CIL rates will generate additional funding towards the

delivery of infrastructure and neighbourhood projects in the borough which have potential for positive effects on protected groups.

- 12.10 An Equalities Impact Assessment (EQIA) screening tool has been completed and as no particular equalities considerations were identified as arising from the proposal to proceed with the partial review a full EQIA is not required. However, equalities matters will be duly considered in the course of the review.

13 Use of Appendices

- Appendix A – Adopted Haringey CIL Charging Schedule 2014
- Appendix B – Haringey CIL Draft Charging Schedule 2019
- Appendix C – Community Infrastructure Levy: Eastern Haringey Viability Update Study prepared by BNP Paribas October 2019

14 Background Papers

- Appendix C to Haringey Housing Strategy 2017-2022
<http://minutes.harinet.haringey.gov.uk/ieListDocuments.aspx?CId=143&MId=8670&Ver=4>

15 Local Government (Access to Information) Act 1985

- 15.1 Preliminary Draft Charging Schedule consultation document 2017
http://www.haringey.gov.uk/sites/haringeygovuk/files/preliminary_draft_charging_schedule_consultation_document_2017_1.pdf

- 15.2 Report to Cabinet (17 October 2017) providing update on Community Infrastructure Levy Charging Schedule and Planning Obligations SPD
<http://www.minutes.haringey.gov.uk/ieListDocuments.aspx?CId=118&MId=8290&Ver=4>

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Community Infrastructure Levy Charging Schedule

updated with Governance and revised Reg 123 (004)

Adoption: July 2014

Implementation: November 2014

Revisions to Regulation 123 List and Governance: November 2017



Introduction

As part of the changes introduced under the Planning Act 2008, the previous Government introduced the Community Infrastructure Levy (CIL) - a new mechanism to enable infrastructure requirements arising from growth to be funded through developer contributions.

The Community Infrastructure Levy Regulations 2012 (as amended) allows councils to introduce CIL, being a charge on new buildings and extensions to help pay for supporting infrastructure and replaces s.106 contributions (except in relation to affordable housing and on site mitigation measures).

What is CIL?

CIL is a standardised non negotiable local levy that is placed on new development for the purpose of helping to raise funds to support the delivery of the infrastructure that is required as a result of new development. Far from being a new source of funding, CIL provides a more consistent and transparent mechanism to raise financial contributions, currently sought through s106 agreements.

However, under CIL, developers can still be required to directly provide both 'off-site' infrastructure, through s106 contributions, and 'on site' improvements through planning conditions to mitigate the direct impact of the development proposed (e.g. landscaping, access roads).

How is CIL calculated and charged?

The regulations require two distinct aspects to be considered. Firstly, a 'charging authority' (the Local Authority) needs to demonstrate that new development necessitates the provision of new, or improved, infrastructure. Secondly, that the rate of the proposed levy does not make development proposals unviable, in particular with regards to expected costs that would be associated with the provision of on-site infrastructure (for the purposes of CIL, affordable housing is regarded as an on-site requirement and will continue to be secured through s106 agreements).

The levy is to be expressed as £ per m² and collected on the commencement of development. CIL is to be charged on the 'gross internal floor space' of any new development, apart from affordable housing and buildings used for charitable purposes where standard exemptions have been made.

Whilst the rate of CIL is determined by the charging authority, it is scrutinised by an independent examiner to assess whether the charge has regard to the evidence base and that the level of charge is reasonable and will not impact negatively on the economic viability of development.

The Infrastructure Funding Gap

The Council has produced an Infrastructure Study in March 2010 setting out the likely infrastructure impacts of growth identified in the Council's Local Plan. This has been built on and an updated document setting out the current anticipated funding requirements to meet infrastructure needs in the Borough was produced in March 2013. The outcomes of this study indicate that there is a total funding gap that CIL can contribute towards of approximately £230m. This is set out below, and the summary document is included on our website.

The level of Investment required is indicative and it includes investment that may need to be undertaken by both the Council and its partners. The investment required will need to be subject to continuous review in light of changes to the funding regimes for both the Council and its partner organisations and changing roles and functions of public sector organisations in years to come. The actual level of investment the Council makes in future years will clearly be subject to Council priorities and available funding and will need to be agreed by Cabinet as appropriate.

Table 1 Summary of Infrastructure Investment Estimates 2013/14-2026/27			
Infrastructure Type	Investment Required (£m)	Funding Available (£m)	Funding Gap (£m)
Education	198.0	120.0	78.0
Health	tbc	tbc	Tbc
Open space/ Leisure	22.3	1.5	20.8
Transport	107.6	19.5	88.1
Emergency Services	--	--	--
Decentralised Energy	25.0	2.5	22.5
Water Management & Flooding	20.6	tbc	20.6
Waste	--	--	--
Total (£m)	£373.5	£143.5	£230

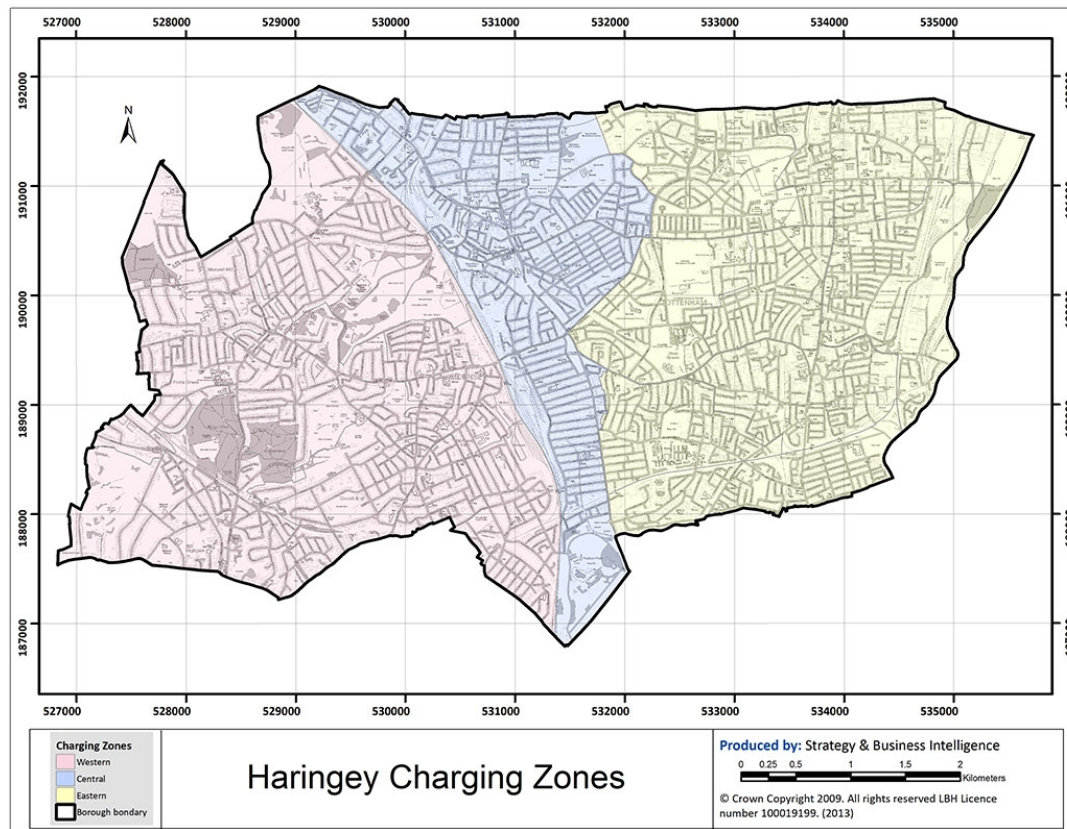
Viability in Haringey

Evidence has been provided by BNP Paribas to identify what CIL rates will be viable in Haringey. A primary study was received in February 2012, and updates to the evidence were provided in February 2013. The full set of evidence is available on our website.

The Charging Schedule

The proposed schedule is set out below. The map shows the charging zones:

Table 2- Approved CIL Charging Schedule for Haringey				
CIL charge (£/square metre)				
Use	Western	Central	Eastern	Mayoral CIL
Residential	£265	£165	£15	£35
Student accommodation	£ 265	£165	£15	£35
Supermarkets	£95			£35
Retail Warehousing	£25			£35
Office, industrial, warehousing, small scale retail (use class A1-5)	Nil Rate			£35
Health, school and higher education	Nil Rate			Nil
All other uses	Nil Rate			£35
Superstores/supermarkets are defined as shopping destinations in their own right where weekly food shopping needs are met and which can also include non-food floorspace as part of the overall mix of the unit. Retail warehouses are large stores specialising in the sale of household goods (such as carpets, furniture and electrical goods), DIY items, and other ranges of goods, catering mainly for car borne customers.				



Exemptions

CIL charges will not be levied on:

- Development that creates less than 100m² of new build floor space measured as Gross Internal Area (GIA) and does not result in the creation of one or more dwellings.
- Buildings into which people do not normally go, or only go to perform maintenance.
- Buildings for which planning permission was granted for a limited period.
- Affordable housing, subject to an application by a landowner for CIL relief (CIL regulation 49).
- Development by charities for charitable purposes subject to an application by a charity landowner for CIL relief (CIL regulation 43).
- Development classified as self-build.
- Development classified as a residential annex or extension.

The CIL Regulations 2010 set out the situations for both mandatory and discretionary exemptions. Mandatory exemptions include affordable housing and developments occupied solely for the purpose of charitable activity by a registered charity. However, the charging authority has discretionary powers to provide relief on:

- the investment activities of charitable institutions

- in exceptional circumstances where:
 - the cost of complying with s106 planning obligation is greater than the chargeable amount payable by a developer;
 - there is an unacceptable impact on the economic viability of a development
 - that the granting of relief would not constitute state aid.

The Council will not expect to implement any discretionary exemptions. The Council believes the charge is viable and will monitor the charge to ensure it remains viable. Should circumstances change the Council will seek to revise the levy rather than provide any discretionary relief from the charge.

Payments in kind

In circumstances where the liable party and Haringey Council agree, payment of the levy may be made by transferring land. The agreement cannot form part of a planning obligation, must be entered into before the chargeable development is commenced and is subject to fulfilling the following:

- the acquired land is used to provide or facilitate the provision of infrastructure within Haringey;
- the land is acquired by the Council or a person nominated by the Council;
- the transfer of the land must be from a person who has assumed liability to pay CIL;
- the land has to be valued by an independent person agreed by the Council and the person liable to pay CIL;
- 'Land' includes existing buildings and other structures, land covered with water, and any estate, interest, easement, servitude or right in or over the land.

Collection of CIL

London Borough of Haringey is the collecting authority for the purpose of Part 11 of the Planning Act 2008 and CIL Regulations 2010 (as amended by Regulations 2011 and 2012).

When planning permission is granted, Haringey Council will issue a liability notice setting out the amount payable, and the payment procedure.

In the case of development enabled through permitted development orders, the person(s) liable to pay will need to consider whether their

proposed development is chargeable, and to issue Haringey Council a notice of chargeable development.

Payment Instalments

Where the payable amount of CIL is £500,000 or less, the whole amount shall be paid in a single installment not more than 60 days after commencement of the development.

Where the payable amount is more than £500,000, developers should have the option to pay two installment payments:

- The greater of £500,000 or half the value of the total payable amount 60 days after commencement, and
- The remainder 240 days after commencement.

Appeals

A liable person can request a review of the chargeable amount by the charging authority within 28 days from the issue of the liability notice.

CIL Regulations allow for appeals on:

- The calculation of the chargeable amount following a review of the calculation by the Council.
- Disagreement with the Council's apportioned liability to pay the charge.
- Any surcharges incurred on the basis that they were calculated incorrectly, that a liability notice was not served or the breach did not occur.
- A deemed commencement date if considered that the date has been determined incorrectly.
- Against a stop notice if a warning notice was not issued or the development has not yet commenced.

A person aggrieved by the levy (or attempt to levy) of a distress can appeal to the Magistrates Court.

Spending CIL revenue

CIL revenue will be spent on infrastructure needed to support development in Haringey. This need is assessed as part of the Local Plan making process and an Infrastructure Delivery Plan is included in the adopted Local Plan: Strategic Policies. This infrastructure needs and delivery plan are updated regularly.

The Council includes as part of this submission the proposed Regulation 123 list below.

Table 3: Haringey's Regulation 123 List
Haringey CIL funding may be applied in whole or part to the provision, improvement, replacement or maintenance of the following infrastructure:
Educational Facilities
Further Education Facilities
Health and wellbeing Facilities
Parks and Open Spaces
Social and Community Facilities
Transport and Highways (excluding works that area required as part of a development proposal to be secured through a Section 278 Agreement)
Enterprise Space
Sports and Leisure Facilities
Public Realm Improvements
Community Safety Measures
District Energy Network and associated infrastructure
<p>The above list is not in order of priority. The above list excludes infrastructure projects that are required to make a development acceptable in planning terms in accordance with the planning policies set out in the Council's Local Plan. Whilst CIL will be the Council's main mechanism for securing funding towards the infrastructure that is required to support the cumulative demands from development in Haringey, there will be some instances where individual development gives rise to their own requirements for infrastructure in order to make the development acceptable in planning terms. Such infrastructure will be secured as part of the development through the use of planning conditions or planning obligations. Further details on this approach are set out in the Council's Planning Obligations SPD.</p>
<p>This Regulation 123 list therefore explicitly excludes the provision of infrastructure that is required to make a development acceptable in planning terms and which meets the legal tests of Regulation 122 of the CIL Regulations. Through the publication of this list the Council therefore retains its discretion to negotiate</p>

necessary planning conditions and s106 planning obligations to secure such infrastructure.

Distribution of CIL funding

As per the CIL Regulations and Guidance, the Haringey's CIL is proportioned and allocated using the following approach:

- 5% is retained by Haringey Council to cover administrative costs (including consultation on the levy charging schedule, the issuing of liability notices, enforcing CIL, legal costs and reporting on CIL activity);
- 15%, known as the 'Neighbourhood Proportion', is to be spent on neighbourhood projects within the neighbourhood of contributing development (up to a maximum of £100 per existing Council Tax dwelling). In accordance with Regulation 59C, neighbourhood projects can include funding towards:
 - the provision, improvement, replacement, operation or maintenance of infrastructure; or
 - anything else that is concerned with addressing the demands that development places on an area.

The funding allocation rises to 25% where a Neighbourhood Plan is in place. At the present time, only the Highgate Neighbourhood Plan has been adopted, and one is currently being developed for Crouch End;

- 80%, known as the 'Strategic Proportion', is retained by Haringey Council to allocate to projects on its capital programme which are infrastructure that supports growth. An indication of such projects are set out in the CIL Regulation 123 List above and the IDP.

Identifying the specific infrastructure projects to be funded by CIL

Strategic Proportion

The Strategic Proportion of CIL will be spent on CIL eligible projects with the Capital Programme, taking into account the Regulation 123 List and the IDP. Bid's outside of the existing Capital Programme, will be considered by the Assistant Director for Planning. Those considered to support sustainable growth (see the assessment criteria for prioritising infrastructure to be funded by CIL set out further below) and that are eligible for CIL funding, will be referred to the Haringey Capital Board for a final decision.

Neighbourhood proportion

Where there is a neighbourhood plan in place, the neighbourhood plan should identify the local neighbourhood projects required to support development proposed by the plan or to give effect to policies/proposals within the plan. Projects eligible for CIL funding should be specifically identified and, where appropriate, projects prioritised (see the assessment criteria for prioritising infrastructure to be funded by CIL set out further below).

CIL eligible neighbourhood projects could include, for example: road and footpath improvements; tree planting; new or improved play spaces and facilities; community safety measures (e.g. CCVT, lighting); new or improved cycling facilities; traffic calming measures; improvements to school grounds and buildings; and the improvement of local facilities such as libraries, community centres or sports halls. Such projects could be funded in whole or part through CIL receipts.

The Council will cost the eligible neighbourhood projects (including project management costs, contingencies and long-term maintenance provision) and will pool the neighbourhood proportion of CIL receipts raised within the designated neighbourhood area to pay for the items therein, investigating other sources of funding (such as grants and match funding) where possible.

Outside of neighbourhood plan areas, the CIL Regulations allow the Council as Charging Authority to decide what its own bespoke definition of a 'local' neighbourhood area is. As such, the wards in Haringey have been grouped into eight CIL Neighbourhood Groups based upon having the same CIL rate and having regard to the broad distribution of growth planned through the Local Plan. This is the approach recommended by the Council's Scrutiny Panel in order to streamline the process, provide for a meaningful level of CIL funding to deliver larger projects, and ensure an element of strategic decision making across the seven areas:

- Area 1 – Fortis Green, Alexandra and Muswell Hill wards, and the area of the Highgate ward outside the Neighbourhood Plan area.
- Area 2 – Hornsey and Stroud Green wards, and the area of Crouch End wards outside of the Neighbourhood Plan area
- Area 3– Bounds Green ward

- Area 4 – Noel Park and Woodside wards
- Area 5 – Harringay ward
- Area 6 – White Hart Lane and Northumberland Park wards
- Area 7 – West Green, St Ann's and Seven Sisters wards
- Area 8 – Tottenham Green, Bruce Grove and Tottenham Hale wards



Consultation with the community within each CIL Neighbourhood Group will be undertaken to compile an initial list of projects and the priorities, determined by the number supporting the same or similar infrastructure. CIL receipts raised within each CIL Neighbourhood Group are will then be spent against the list of projects compiled for each area. The consultation will be rerun every two to three years to ensure the projects and priorities are still the most relevant to the local community.

Prioritising the infrastructure projects to be funded by CIL

It is very unlikely that CIL will generate enough funds to completely cover the cost of new infrastructure needed to fully support planned development. As such, there will be competing demands for this funding. To ensure the spending of CIL funds are prioritised in the right

way, the Assistant Director of Planning will assess and prioritise project proposals against the following set of guiding criteria:

- a. The proposed project has the support of the service provider or operator;
- b. The use of CIL funding is necessary as no alternative funding sources are available to deliver the proposed infrastructure, including funding that may be made available in a later funding period (the exception is where there is an urgent need for the infrastructure and the Council can secure the CIL funds to be reimbursed at specified later date);
- c. The proposed infrastructure will promote a sustainable form of development and will not give rise to local impacts;
- d. The use of CIL funding can help to optimised the delivery of identified infrastructure through the ability to leverage other sources of funding, such as match or gap funding, or to reduce borrowing costs;
- e. The use of CIL funding can provide additionality to a capital infrastructure project that maximises the benefits of the parent project where mainstream funding does not provide for this;
- f. The use of CIL funding can increase the capacity of existing strategic infrastructure;
- g. The use of CIL funding can help to deliver coordinated improvements within the area;
- h. The use of CIL funding can help to accelerate the delivery of regeneration initiatives;
- i. The use of CIL funding will help further sustainable economic growth for the benefit of the area or the borough;
- j. The proposed infrastructure is of a sufficient scale or scope so as to positively impact the local area;
- k. The proposed infrastructure can be delivered within 24 months of authorisation;
- l. The use of CIL funding represents value for money and will not give rise to long-term liabilities that place a financial burden on the service provider or operator.

The more criteria met, the greater the priority the CIL funding a project will receive.

CIL and Section 106 agreements

Unlike s106, CIL is to provide infrastructure to support the development of an area, not to make individual planning applications acceptable in planning terms. It breaks the link between a specific development

site and the provision of infrastructure and thus provides greater flexibility for delivery of infrastructure when and where it is needed.

Section 106 agreements and Section 278 Highways Agreements will continue to be used to secure site-specific mitigation and affordable housing. In some instances, S106 agreements may be used in large development sites needing the provision of their own specific infrastructure for which delivery may be more suitably dealt with through s106s. Type of s106 requirements may include the following:

- Specific infrastructure requirements that directly arises from five or fewer developments, section 106 arrangements may continue to apply if the infrastructure is required to make the development acceptable in planning terms
- Affordable housing contributions
- New access roads/ junction improvements serving the site
- Connections to a renewable/ decentralised energy network
- On-site open space requirements
- Employment and training provision
- Travel plans / Car clubs / Cycle parking
- Town Centre management funding

Further details on the application of planning obligations is set out in the Haringey Planning Obligations SPD

Mayoral CIL

The Mayoral CIL has been in effect since April 2012 in accordance with Regulation 25 (a) of the Community Infrastructure Regulations 2010 (as amended). The Mayor published his CIL charging schedule on the GLA's website, and it is intended to contribute towards the funding of Cross Rail, and the Mayor has in effect declared his aim of raising £300m from Mayoral CIL towards this project. The Mayor's target is expected to be achieved by 2019. It is very likely that further London wide infrastructure funding will be required in the future and the revision and required collection of Mayoral CIL will now form a permanent feature of the planning and development policy framework operating in London.

The London boroughs collect the Mayor's CIL on his behalf. Haringey falls within Zone 2 of the Mayor's Charging Schedule which means that Haringey is required to collect £35/m² on behalf of the Mayor for any development that falls within scope of the regulations.

Monitoring and Reporting on CIL

The Council will publish annual reports showing, for each financial year:

- How much has been collected in CIL by CIL Neighbourhood Group area, including the split between the Strategic and Neighbourhood portions of CIL;
 - How much has been spent by CIL Neighbourhood Group area, including the split between the Strategic and Neighbourhood portions of CIL;
 - The infrastructure on which it has been spent;
 - Any amount used to repay borrowed money;
 - Amount of CIL retained at the end of the reported year by CIL Neighbourhood Group area, including the split between the Strategic and Neighbourhood portions of CIL.
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-

Community Infrastructure Levy

Draft Charging Schedule

Date: November 2019

Section 211(1), Planning Act 2008 (as amended)
Part 3, CIL Regulations 2010 (as amended)

1. The Charging Authority

1.1 The London Borough of Haringey is the 'Charging Authority'.

2. Date of Approval

2.1 This Charging Schedule was approved by the Council on DAY/MONTH/YEAR.

3. Date that Effect

3.1 This charging schedule will come into effect on DAY/MONTH/YEAR.

4. CIL Rates

4.1 The Council intends to charge different rates of CIL by the land use of a proposed development (expressed as pounds per square metre) and by the area where a proposed development is situated, as set out in Table 1 below.

Table 1: CIL rates

Use	Western	Central	Eastern
Residential	£265*	£165*	£50
Student accommodation	£265*	£165*	£85
Build to Rent housing	£265*	£165*	£100
Warehouse Living	Nil	Nil	£130
Supermarkets	£95*		
Retail Warehousing	£25*		
Office, industrial, warehousing, small scale retail (use class A1-5)	Nil		
Health, school and higher education	Nil		
All other uses	Nil		
Warehouse Living comprises purpose built and genuinely integrated, communal working and living accommodation specifically targeted at the creative industries sectors. Superstores/supermarkets are defined as shopping destinations in their own right where weekly food shopping needs are met and which can also include non-food floorspace as part of the overall mix of the unit. Retail warehouses are large stores specialising in the sale of household goods (such as carpets, furniture and electrical goods), DIY items, and other ranges of goods, catering mainly for car borne customers. Build to Rent is housing development which meets the definition set out in policy H13 of the Draft London Plan			

*Rates that are not amended as part of the Partial Review of the CIL Charging Schedule in 2019/20 will be indexed for inflation in accordance with the CIL Regulations 2010 (as amended) based on the date of their original effect in the original CIL Charging Schedule (November 2014) to the date of final approval (expected 2020/21). The updated indexed figures will be provided as part of the final reviewed CIL Charging Schedule at the point of final approval (expected 2020/21) rather than in this Draft Charging Schedule document.

5. Charging Zones

5.1 The CIL charging zones referred to in the above table are illustrated on the Charging Zone Map attached at Appendix 1 of this document.

6. Calculating the Chargeable Amount

6.1 The amount to be charged for each development will be calculated in accordance with Schedule 1 of the Community Infrastructure Levy Regulations 2010 (as amended). For the purposes of the formulae in Schedule 1, the relevant rate (R) is the rate for each charging zone shown in Table 1 above.

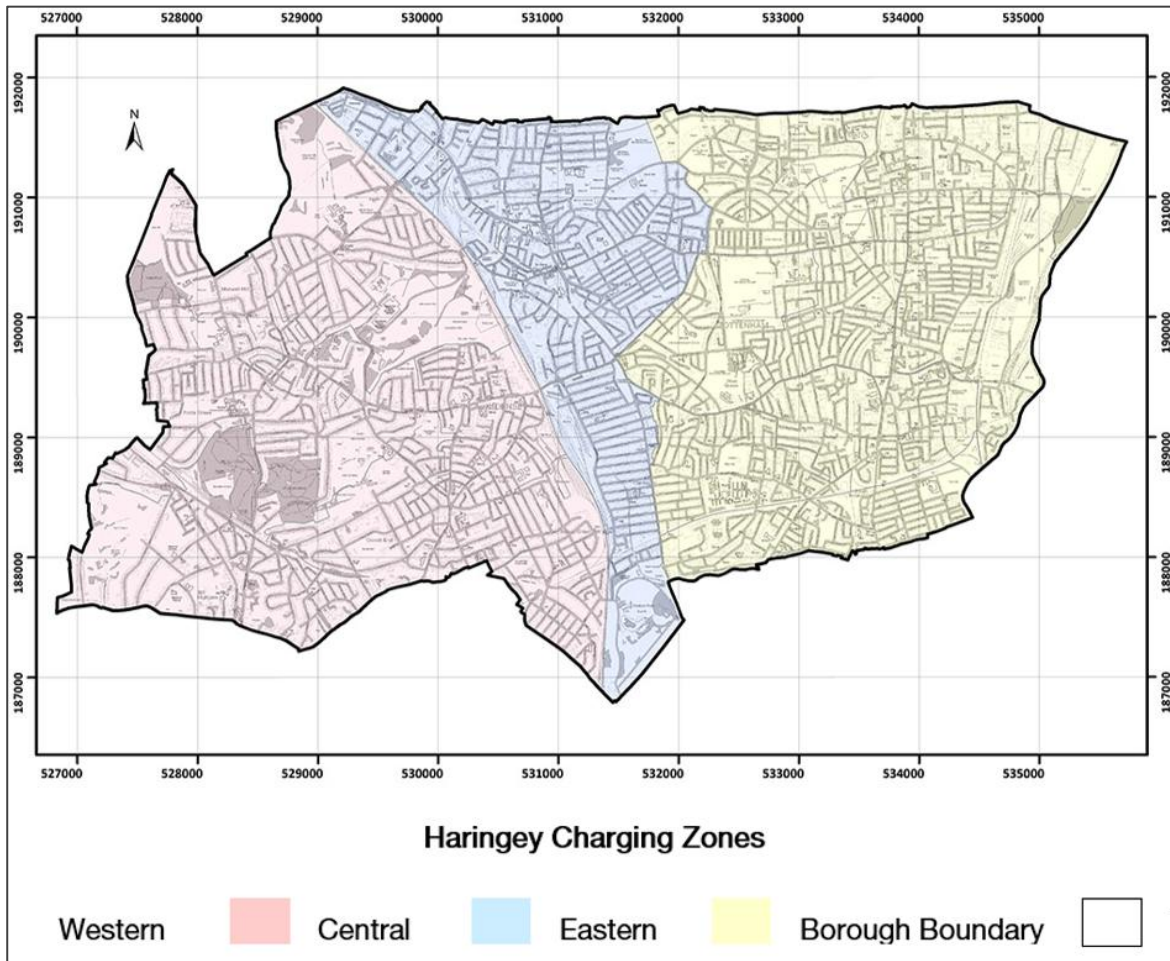
7. Statutory Compliance

7.1 The Charging Schedule has been issued, approved and published in accordance with the CIL Regulations 2010 (as amended) and Part 11 of the Planning Act 2008 (as amended).

8. Further Information

8.1 Further information on the Community Infrastructure Levy is available on the Council's website www.haringey.gov.uk/CIL

Appendix 1





Community Infrastructure Levy: Eastern Haringey Viability Update Study



Prepared for
London Borough of Haringey

October 2019

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Appendices

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- Appendix 2 - Residential appraisal results at base costs and values (LAR and SO)
- Appendix 3 - Residential appraisal results at base costs and values (SR and SO)
- Appendix 4 - Residential appraisal results at base costs and values (SR and DMR at LLR)
- Appendix 5 - Residential appraisal results at 40% AH +10% sales values and +5% build costs
- Appendix 6 - Residential appraisal results at 40% AH -5% sales values
- Appendix 7 - Residential provided as PRS appraisal results
- Appendix 8 - Student Accommodation appraisal results
- Appendix 9 - Warehouse Living appraisal results

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1 Executive Summary

- 1.1 The London Borough of Haringey ('the Council') adopted its Community Infrastructure Levy ('CIL') Charging Schedule on 21 July 2014 and was implemented on 1 November 2014. The CIL rates are consequently embedded into both planning requirements and the land market. Since implementation, a number of large developments within and around the Tottenham Hale and North Tottenham growth areas, and in Seven Sisters have completed, started or have secured planning permission including Apex House and Tottenham Hotspur Football Club. Linked to this regeneration of the eastern part of the London Borough of Haringey there has been a significant growth in residential values.
- 1.2 In light of the developments noted above, the Council commissioned BNP Paribas Real Estate to undertake a review of the residential and student accommodation CIL rates in the Eastern CIL Zone of the adopted CIL Charging Schedule as well as to consider a rate for Warehouse Living. The latter use is a newer form of housing development that has been delivered in the borough and is consequently not currently covered by the adopted CIL Charging Schedule. This review therefore seeks to establish whether there is scope for residential and student accommodation developments in the Eastern CIL Zone to viably contribute an increased level of CIL and whether Warehouse Living schemes across the borough can viably contribute through CIL towards the delivery of the necessary supporting infrastructure.
- 1.3 Accordingly this report considers the residential and student accommodation rates adopted in the Eastern CIL Zone and the potential rates for Warehouse Living schemes in combination with the cumulative impact of the requirements of the Council's Local Plan adopted July 2017 (comprising the Strategic Policies Development Plan Document ('DPD'); Development Management DPD, Site Allocations DPD and Tottenham Area Action Plan DPD). The testing is in line with the requirements of the National Planning Policy Framework ('NPPF'), National Planning Practice Guidance ('NPPG') and the Local Housing Delivery Group guidance 'Viability Testing Emerging Local Plans: Advice for planning practitioners' (June 2012).
- 1.4 The Council consulted on its Preliminary Draft Charging Schedule ('PDCS') from 10 March 2017 to 21 May 2017. This report provides an update to the PDCS Viability Update Study produced by BNP Paribas Real Estate on behalf of the Council dated December 2016.

Methodology

- 1.5 The study methodology compares the residual land values of a range of development typologies on sites in the borough to their value in its current use (plus a premium), herein after referred to as 'benchmark land value'. If a development incorporating the Council's policy requirements including a given level of CIL generates a higher residual land value than the benchmark land value, then it can be concluded that the site is viable and deliverable. Following the adoption of Local Plan policies, developers will need to reflect policy requirements in their bids for sites, providing that the residual land value does not fall below a site-specific benchmark land value, determined at the time of each individual application.
- 1.6 The study utilises the residual land value method of calculating the value of each development typology. This method is used by developers when determining how much to bid for land and involves calculating the value of the completed scheme and deducting development costs (construction, fees, finance, sustainability requirements, Section 106 contributions and CIL) and developer's profit. The residual amount is the sum left after these costs have been deducted from the value of the development, and guides a developer in determining an appropriate offer price for the site.

- 1.7 The housing and commercial property markets are inherently cyclical and the Council is testing the viability of potential development sites at a time when the market has experienced a period of sustained growth, residential values in Haringey have recovered strongly following the severe recession and now exceed the October 2007 peak levels by circa 71.6%.¹ Forecasts for future house price growth point to continuing growth in mainstream London housing markets, although there is a degree of short term uncertainty surrounding the UK's future relationship with the European Union. Notwithstanding this, forecasts for future house price growth still indicate growth in the 'mainstream' UK and London markets over the next 5 years. We have allowed for this by running a sensitivity analysis which varies the base sales values and build costs, with values increasing by 10% and costs by 5%. This analysis is indicative only, but is intended to assist the Council in understanding the ability of developments to absorb its requirements both in today's terms but also in the future. Some sites may require more detailed viability analysis when they come forward through the development management process due to specific site circumstances that cannot be reflected in an area wide assessment². We have also tested a fall in sales values of 5%, to enable the Council to take a view on the impact of any adverse movements in sales values in the short term. It is important to note, however, that our assessment of suggested CIL rates relies on current and not growth-based appraisal inputs.
- 1.8 This study allows for policy costs such as Mayoral CIL² as a cost to schemes. This assessment does not however include other "extraordinary" sources of funding or revenue that may become available such as Housing Zone funding and grant as this cannot be guaranteed.

Key findings

- 1.9 It is worth noting that some schemes would be unviable even if a zero CIL were adopted. We therefore recommend that the Council pays limited regard to these schemes as they are unlikely to come forward unless there are significant changes to main appraisal inputs, largely separate to the influence of CIL.

Residential

- We have tested residential schemes in the Eastern CIL Zone with a range of affordable housing tenures and percentages. In arriving at the updated recommended rate we have taken into consideration a balance of both the Council's current affordable housing policies target requirement as well as the Council's aspirations to deliver a wider range of affordable housing tenures in the borough.
- Some scenarios (e.g. certain affordable housing percentages) are unviable prior to the application of CIL in the appraisal. There is clearly an important distinction to be drawn between these schemes and those that are viable. Where schemes are viable, the proposed CIL rates are sufficiently modest to ensure that schemes remain viable.
- The results of our appraisal of residential developments shows a wide range of potential maximum CIL rates. We have recommended an increased CIL of £50 per square metre in the Eastern CIL Zone.
- The recommended rates are set at a discount to the maximum rates, in line with the requirements set out in the NPPG. Consequently, there is sufficient flexibility for schemes to be able to withstand the impact of economic cycles over the life of the Charging Schedule. That said, current mainstream forecasts are that residential values will increase over the next five years.

¹ As identified from the Land Registry's online House Price Index database (<http://www.landregistry.gov.uk/public/house-prices-and-sales/search-the-index>)

² The NPPF identifies at para 57 that "It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage". This is reiterated in the NPPG (para 007 Reference ID: 10-007-20190509) which provides further detail on this including an illustrative list of circumstances where viability should be assessed in decision making.

- The proposed CIL amounts to between 1% and 1.6% of development costs and is therefore set at a nominal level, and consequently it will not be a critical determinant in the viability of developments.

PRS

- The results of our appraisals of residential schemes provided as PRS in the Eastern CIL Zone identify that such schemes can viably contribute towards the delivery of supporting infrastructure in the borough. We are aware that there are a number of PRS schemes which have been delivered/are currently coming forward in the Eastern CIL Zone in particular.
- We have recommended that the Council considers adopting a CIL charge of £100 per square metre for PRS schemes delivered in the Eastern CIL Zone reflecting, a 20% buffer from the maximum borough charge of £125 per square metre.
- The proposed CIL amounts to a charge of circa 4% of development costs, which at below 5% is in our experience not a determining factor in a developer's decision as to whether or not to proceed with a development.

Student accommodation

- Student housing developments in the Eastern CIL Zone of the borough have seen rapidly increasing rents since the previous CIL Viability Study, which has increased residual land values. Consequently, these developments can absorb a higher CIL contribution without a significant impact on viability.
- We have recommended that the Council considers adopting a charge of £85 per square metre. This level of charge is based on the delivery of at least 40% affordable student accommodation within schemes and allows for a buffer from the maximum rate.
- At £85 per square metre this would amount to a cost of circa 2.25% of development costs, which we consider would not have a significant bearing on a developer's decision to bring forward a scheme

Warehouse living

- The Council's Policy DM39 (Warehouse Living) "*seeks to further regularise / legitimise this use, and through the planning process, ensure existing and future occupants are provided with an appropriate standard of living*".
- Our appraisals identify that such schemes generate significant residual land values in excess of existing use values. We note that there will be differences from site to site with respect to conversion costs and quality. We would also highlight that some of this space may not qualify for CIL if such schemes do not add any floorspace and or have been lawfully occupied for six months in the last three years.
- We recommend that the Council maintains a CIL charge of £130 per square metre as set out in the PDCS, which reflects a significant discount from the maximum which would account for scheme differences.
- The recommended CIL charge equates to 5.5% of the likely conversion costs or 0.5% of the total development value. Although the CIL charge looks higher by reference to the conversion costs, this is due to the costs being lower reflecting refurbishment and change of use rather than a whole new development. The analysis of the CIL charge by reference to the revenue achievable is therefore helpful in establishing a picture of such scheme's viability. At £130 per square metre the CIL charge is unlikely to have an impact on a developer's decision to deliver such schemes.

Summary

- 1.10 As CIL is intended to operate as a fixed charge, the Council will need to consider the impact on two key factors. Firstly, the need to strike a balance between securing enough revenue to invest in infrastructure on the one hand and the need to *minimise* the impact upon development viability on the other. Secondly, as CIL will effectively take a ‘top-slice’ of development value, there is a potential impact on the percentage or tenure mix of affordable housing that can be secured. This is a change from the historic system of negotiated financial contributions, where the planning authority can weigh the need for contributions against the requirement that schemes need to contribute towards affordable housing provision.
- 1.11 Table 1.11.1 below summarises our recommended revisions to the Eastern CIL Zone charges in Haringey’s CIL Charging Schedule in light of the results of our appraisals. The proposed rates are shown in bold whilst the adopted Charging Schedule rates are shown below with the corresponding 2019 indexed figures (in line with the requirements of CIL Regulation 40 (as amended)) shown in italics.

Table 1.11.1: Potential revisions to CIL Charging Schedule – Eastern CIL Zone

Use	Adopted CIL rate £s per sqm	Adopted CIL rate after indexation £s per sqm	Proposed CIL rate £s per sqm
Residential	£15	<i>£18.63</i>	£50
PRS	£15	<i>£18.63</i>	£100
Student Accommodation	£15	<i>£18.63</i>	£85
Warehouse Living	N/A	<i>N/A</i>	£130

2 Introduction

- 2.1 The Council has commissioned this study to contribute towards a partial review of its adopted CIL Charging Schedule, which has been in place since 1 November 2014. The adopted CIL rates are consequently embedded into both planning requirements and the land market.
- 2.2 The evidence base that underpinned the adopted CIL Charging Schedule was compiled in late 2011 early 2012 and there had been a significant movement in sales values before adoption. There has also been an upwards movement in sales value since adoption due to market factors and a significant amount of regeneration undertaken in the area. The aim of the study is therefore to identify changes in viability that might give rise to amendments to the adopted CIL residential and student accommodation rates within the Eastern CIL Zone. In addition, the study also considers two new forms of residential accommodation, Warehouse Living and PRS, which have come forward in the borough since the adoption of the current Charging Schedule. As with the 2012 Viability Study and 2013 Addendum Viability Study, this report tests the cumulative impact of planning policies and seeks to determine whether the CIL rates adopted could change.
- 2.3 In terms of methodology, we adopted standard residual valuation approaches to test the viability of eight residential development typologies, including the impact on viability of the Council's planning policies alongside the adopted level of CIL and alternative amounts of CIL. However, due to the extent and range of financial variables involved in residual valuations, they can only ever serve as a guide. Individual site characteristics (which are unique), mean that conclusions must always be tempered by a level of flexibility in application of policy requirements on a site by site basis.
- 2.4 In light of the points above we would highlight that the purpose of this viability study is to assist the Council in understanding changes to the capacity of schemes to absorb CIL and to support any proposed changes to the Charging Schedule through Examination in Public. The Study therefore provides an evidence base to show that the requirements set out within the NPPF, CIL Regulations and NPPG are met. The key underlying principle is that charging authorities should use evidence to strike an appropriate balance between the desirability of funding infrastructure from the levy and the potential impact upon the economic viability of development across their area.
- 2.5 As an area wide study this assessment makes overall judgements as to viability of development within the London Borough of Haringey and does not account for individual site circumstances, which may only emerge when an application comes forward. The assessment should not be relied upon for individual site applications. Scheme specific testing may still be required at the point where they come forward³.
- 2.6 This position is recognised within Section 2 of the Local Housing Delivery Group guidance, which identifies the purpose and role of viability assessments within plan-making. This identifies that: *"The role of the test is not to give a precise answer as to the viability of every development likely to take place during the plan period. No assessment could realistically provide this level of detail. Some site-specific tests are still likely to be required at the development management stage. Rather, it is to provide high level assurance that the policies within the plan are set in a way that is compatible with the likely economic viability of development needed to deliver the plan"*.

³ However, the NPPG notes that once plan policies are adopted, land values should adjust to reflect the requirements and that price paid for the land should not be used as a justification for failing to provide policy compliant developments (see for example paragraph 002).

Economic and housing market context

- 2.7 The housing and commercial property markets are inherently cyclical. The downwards adjustment in house prices in 2008/9 was followed by a prolonged period of real house price growth. By 2010 improved consumer confidence fed through into more positive interest from potential house purchasers. However, this brief resurgence abated with figures falling and then fluctuating in 2011 and 2012. The improvement in the housing market towards the end of 2012 continued through into 2013, at which point the growth in sales values improved significantly through to the last quarter of 2014, where the pace of the improvement was seen to moderate and continued to do so in 2015. The UK economy sustained momentum following the result of the UK's referendum on its membership of the European Union (EU), and as a result the UK housing market surprised many in 2016. The average house price rose 4.5%, which was 0.2% lower than our forecast and ahead of the level recorded in 2015. While first time buyer numbers continued to recover in 2016, overall transaction levels slowed as some home movers and investors withdrew from the market.
- 2.8 The referendum held on 23 June 2016 on the UK's membership of the EU resulted in a small majority in favour of exit. The immediate aftermath of the result of the vote was a fall in the Pound Sterling to a 31-year low and stocks overselling due to the earnings of the FTSE being largely in US Dollars. As the Pound dropped significantly this supported the stock market, which has since recouped all of the losses seen and is near the all-time highs. Since this point we have been in a period of uncertainty in relation to many factors that impact the property investment and letting markets. In March 2017 (the point at which Article 50 was triggered signalling the official commencement of the UK's exit from the EU), the Sterling Exchange Rate Index ("ERI") fell a further 1.5% from the end of February and was 10.5% lower compared with the end of March 2016. Since August 2017 the Bank of England's ("BoE's") Inflation Reports have identified that Sterling has broadly remained around 15%-20% below its pre-referendum peak (November 2015). The February 2019 Report identifies that ERI remains at around 17% below the late-2015 peak. It is anticipated that, *"the exchange rate may adjust when greater clarity emerges about the nature of EU withdrawal. If it becomes clear that there will be a smooth transition to a relationship that is judged to have a relatively small long-term economic impact, the exchange rate is likely to appreciate. In contrast, if there is an expectation that the long-term economic impact of the new relationship would be large, sterling could depreciate."* This is a key consideration in the property market as the cheaper pound has resulted in interest from foreign investors.
- 2.9 There have been tentative signs of improvement and resilience in the market, however this has been tempered by heightened uncertainty relating to post EU exit arrangements. BNP Paribas Real Estate's Q4 2018 Residential Market Commentary identified that, *"Substantial economic and political uncertainty remains both nationally and globally and it does not look likely that this will change any time soon. The likely outcome of Brexit negotiations remains extremely uncertain. The route Britain takes will have significant implications for the UK and the rest of Europe. The fundamentals of the UK economy remain broadly positive, but sentiment remains cautious with constant negative media resulting in indecision within many markets."*
- 2.10 The International Monetary Fund ("IMF") accurately anticipated in its World Economic Outlook Report ('WEO') that growth would slow in 2018, with its initial forecast of 1.4%. This was revised to 1.5% between April 2017 and April 2018, at which point it was briefly increased to 1.6% but was revised down to 1.4% in July 2018, where it has remained up to the IMF's most recent WEO Report published in July 2019.
- 2.11 The IMF growth forecasts for 2019 and 2020 show a small increase in GDP but at low levels by historic standards. The forecasts were revised downwards in April 2019 from those published in January 2019 at 1.2% (down from 1.5%) and 1.4% (down from 1.6%) respectively. These remain broadly the same in July 2019, however the 2019 figure has

been revised up by 0.1% to 1.3%. The July WEO Report identifies that this baseline projection, *“...The upward revision reflects a stronger-than-anticipated first quarter outturn boosted by pre-Brexit inventory accumulation and stockpiling. This is likely to be partially offset by payback over the remainder of the year. Monthly GDP for April recorded a sharp contraction, in part driven by major car manufacturers bringing forward regular annual shutdowns as part of Brexit contingency plans. The forecast assumes an orderly Brexit followed by a gradual transition to the new regime. However, as of mid-July, the ultimate form of Brexit remained highly uncertain”*.

- 2.12 This sentiment is shared by the more recent Bank of England (“BoE”) Monetary Policy Committee’s (“MPC”) August 2019 Inflation Report, which identifies that, *“Brexit-related developments, such as stockbuilding ahead of previous deadlines, are making UK data volatile. After growing by 0.5% in 2019 Q1, GDP is expected to have been flat in Q2, slightly weaker than anticipated in May. Looking through recent volatility, underlying growth appears to have slowed since 2018 to a rate below potential, reflecting both the impact of intensifying Brexit-related uncertainties on business investment and weaker global growth on net trade. Evidence from companies, up to the middle of July, suggests that uncertainty over the United Kingdom’s future trading relationship with the European Union has become more entrenched. The labour market remains tight. Annual pay growth has been relatively strong. Consumer spending has remained resilient. CPI inflation was 2.0% in June and core CPI inflation was 1.8%”*.
- 2.13 The BoE and IMF continue to highlight the key sources of risk to the global outlook to be *“trade and technology tensions that dent sentiment and slow investment”* (IMF July 2019 WEO). The BoE August inflation report identifies that, *“Since May, global trade tensions have intensified and global activity has remained soft. This has led to a substantial decline in advanced economies’ forward interest rates and a material loosening in financial conditions, including in the United Kingdom. An increase in the perceived likelihood of a no-deal Brexit has further lowered UK interest rates and led to a marked depreciation of the sterling exchange rate”*. The IMF July 2019 report sets out that, *“Global growth remains subdued. Since the April World Economic Outlook (WEO) report, the United States further increased tariffs on certain Chinese imports and China retaliated by raising tariffs on a subset of US imports. Additional escalation was averted following the June G20 summit. Global technology supply chains were threatened by the prospect of US sanctions, Brexit-related uncertainty continued, and rising geopolitical tensions roiled energy prices”*.
- 2.14 Inflation, which was a particular concern in 2018 economic reporting, has eased in 2019 with both the BoE and IMF attributing the easing in inflationary pressures to the drop in energy prices. The BoE reports that *“CPI inflation had been 2.0% in May. It was likely to fall below the 2% target later this year, reflecting falls in energy prices. Core CPI inflation had been 1.7% in May, and core services CPI inflation had remained slightly below levels consistent with meeting the inflation target in the medium term”*. The BoE August Report forecasts that *“after falling in the near term, CPI inflation is projected to rise above the 2% target, as building excess demand leads to firmer domestic inflationary pressures. Conditioned on prevailing asset prices, CPI inflation reaches 2.4% by the end of the three-year forecast period”*.
- 2.15 The UK’s low unemployment rate, which was reported by the IMF to be *“close to historic lows”* in April 2018, is identified to have continued to fall through 2019. Of interest the BoE January 2018 Report identified that the unemployment rate had fallen, *“to a little below the MPC’s estimate of the equilibrium rate made in February 2018. The MPC judges that fall has reflected a cyclical rise in labour demand... The number of vacancies relative to the size of the workforce — a key indicator of labour demand — has risen to a historical high... And the rate at which those already in employment are switching to new jobs — which will partly reflect the degree to which employers are competing to hire employees — has risen to close to its pre-crisis level”*. When unemployment falls below the equilibrium rate, wage and inflationary pressures will tend to build, as companies need to pay more to recruit and retain staff. The August 2019 BoE Report identifies that, *“although pay growth has risen over the*

past year, it remains lower than before the financial crisis, despite a lower unemployment rate. That is likely to reflect subdued growth in productivity — the amount of output that can be produced per worker — which has reduced the wage rises that companies can afford to offer their employees”.

- 2.16 The BoE’s August 2019 Monetary Policy Summary confirmed that, *“The Bank of England’s Monetary Policy Committee (MPC) sets monetary policy to meet the 2% inflation target, and in a way that helps to sustain growth and employment. At its meeting ending on 31 July 2019, the MPC voted unanimously to maintain Bank Rate at 0.75%.”* The rate remains low by historic standards and we consider that any additional rise in interest rate that may occur will likely be introduced slowly and steadily to eliminate economic shock. Forecasters still expect interest rates to rise gradually over the next few years, and anticipate rates to reach 2% by 2021.
- 2.17 Nationwide’s Chief Economist, Robert Gardiner identifies in the September 2019 House Price Index Report that, *“UK annual house price growth almost ground to a halt in September, at just 0.2%. This marks the tenth month in a row in which annual price growth has been below 1%”.* A similar position is reported in the September 2019 Halifax House Price Index Report, where Russell Galley, Managing Director of the Halifax, highlights that, *“There was no real shift in house prices in August as the average property value grew by just 0.3% month on month. This further extends the predominantly flat trend we’ve seen over the last six months, with the average house price having barely changed since March”.*
- 2.18 Both Nationwide and The Halifax acknowledge that the current economic uncertainty is influencing the housing market, *“with evidence of both buyers and sellers exercising some caution”* (Halifax), however household spending is reported in both sources as being more resilient, *“supported by steady gains in employment and real earnings”* (Nationwide) as well as affordability (Halifax). With Halifax further identifying that, *“We should also not lose sight of the fact that the single biggest driver of both prices and activity over the longer-term remains the dearth of available properties to meet demand from buyers”.*
- 2.19 Robert Gardiner also identifies that *“The underlying pace of housing market activity has remained broadly stable, with the number of mortgages approved for house purchase continuing within the fairly narrow range prevailing over the past two years. Healthy labour market conditions and low borrowing costs appear to be offsetting the drag from the uncertain economic outlook”.*
- 2.20 In the January 2019 Nationwide House Price Index report Robert Gardiner considered that *“if economy continues to grow at a modest pace, with the unemployment rate and borrowing costs remaining close to current levels, we would expect UK house prices to rise at a low single-digit pace in 2019.”* This view was shared by Russell Galley, who concluded the Halifax January 2019 House Price Index report by identifying, *“On balance therefore we expect price growth to remain subdued in the near term.”*
- 2.21 Knight Frank identified in their January 2019 UK Residential Market Update that, *“The property market has proven adept at adjusting to change in the past, but uncertainty is more difficult. Buying a home is the biggest financial decision many households will undertake, and some may feel more confident when future economic conditions are clearer.”*
- 2.22 It is worth noting that the stamp duty changes introduced in December 2014 when purchasing residential property continues to have an effect on the housing market, as it encourages first time buyers, who predominantly purchase lower priced properties, to pay lower stamp duty rates: up to £125,000 (0%), up to £250,000 (2%); and discourages wealthier families to buy property who have the capital to buy a £1,000,000 home but now have to pay 10% stamp duty rates, which will significantly impede their budgets and affordability. However, for overseas investors, the post-EU referendum fall in sterling has offset the impact of higher Stamp Duty to a large extent. As first noted in BNP Paribas Real

Estate's Q2 2017 Housing Market Report, *"the market has become increasingly reliant on first-time buyers, especially with the depletion of mortgaged movers from the market. Income weakness clearly has potential to dent activity amongst this group given the high average loan-to-value ratios needed to gain the first step on the ladder."* In addition, there remains the further impact on the market of recent legislative and tax changes on the purchase of second properties. Strutt and Parker identify in their Residential Quarterly Report Winter 2018/19 that, *"Overall, the Buy-to-Let market looks to be relatively stable, albeit with subdued levels of new uptake."*

- 2.23 Transaction numbers have been boosted in recent years by rising numbers of First Time Buyers, in addition to the stamp duty changes Savills highlight in their January 2019 Housing Market Update that "They have been strongly supported by government policy, notably Help to Buy, while Home Movers have struggled to climb the housing ladder." Savills also identify that First Time Buyers, "are now the largest buyer type, having overtaken Home Movers. The last time First Time Buyers were the largest buyer type was 1995". Moreover the availability of finance to First Time Buyers remains strong with Savills reporting that, "The high street banks remain keen to grow their lending to this group. Lloyds recently announced a new 100% mortgage for First Time Buyers, to be secured by a family member opening a savings account, a move that seeks to further capitalise on the 'Bank of Mum and Dad'."
- 2.24 Residential sales value forecasts by numerous property firms have continued to identify since June 2016 that uncertainty has weighed down the market slowing sales value growth. In Strutt and Parker's 2018/19 Report they identify that, the *"considerable political uncertainty"* experienced in the UK *"is feeding through into a very cautious and unknown economic outlook from most commentators"*. The market remains very volatile and hard to predict, although Strutt and Parker's residential agents have reported "instances of competitive bidding on realistically priced properties, highlighting that there remains a market for good quality stock at appropriate prices". This position is maintained in Strutt and Parker's Q2 Summer 2019 Report.
- 2.25 Forecasts for house price growth identify that values are expected to increase over the next five years, however this price growth is identified as being more moderate than over the past 20 years. There is a consensus that a low level of price growth is expected over the next year with a return to stronger sales value growth in 2020 - 2023, when it is anticipated that there will be more certainty on the deal agreed for the UK's exit from the EU and employment growth, wage growth and GDP growth return towards trend levels. We provide further detail on the mainstream London market sales value forecasts below.

Local housing market context

- 2.26 According to Land Registry data as of February 2009, values had fallen in Haringey by circa 20% from the peak of the market values (see Figure 2.26.1 below). Subsequently values recovered steadily to September 2011, exceeding the October 2007 peak of the market value in April 2011. Between September 2011 and December 2011 average values dropped by circa 8%, but recovered steadily from January 2012. When our initial viability report was prepared in December 2016 and the data upon which the rates have been set, the sales values in Haringey were reported to be circa 65% higher than the October 2007 peak of the market values. As of July 2019 (the most recent date for which data is available) residential sales values were 71.6% higher than the October 2007 peak of the market values.
- 2.27 Haringey has seen very strong growth in sales values, particularly in the east of the borough, where values have more than doubled since the CIL was set in the adopted Charging Schedule. Growth in values has partly been driven by a number of major development schemes coming forward, regenerating the area.

- 2.28 As previously identified, the future trajectory of house prices is currently uncertain, although both Knight Frank and Savills' current predictions are that values are expected to increase over the next five years. Their medium term predictions are that house prices for properties in the Greater London/Mainstream London market will grow by 9.2% and 4.5% (respectively) over the period between 2019 to 2023 inclusive, this is compared to a UK average of 10.3% and 14.8% (respectively) cumulative growth over the same period.

Figure 2.26.1: Average house prices in Haringey

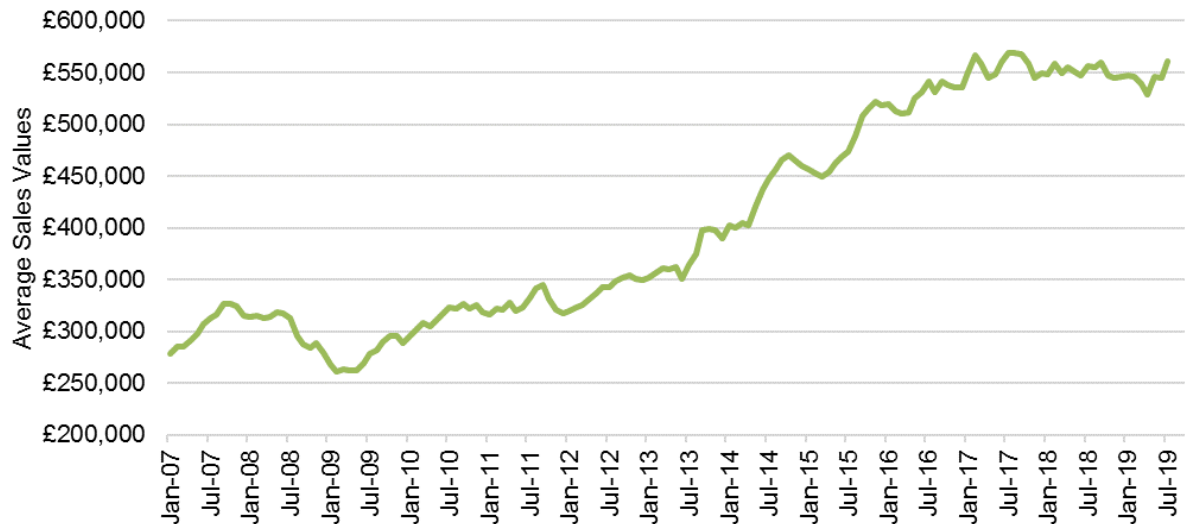
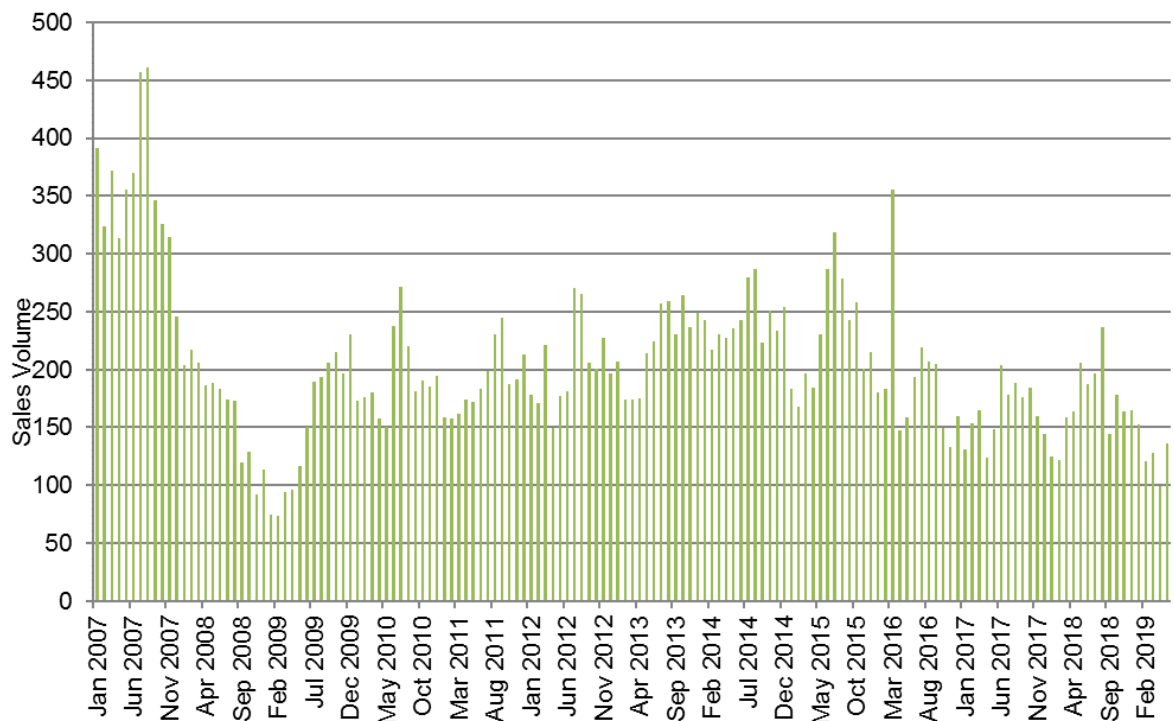


Figure 2.26.2: Sales volumes in Haringey



Source: Land Registry

National Policy Context

The National Planning Policy Framework ('NPPF')

- 2.29 In March 2012, the old suite of planning policy statements and planning policy guidance was replaced by a single document – the National Planning Policy Framework ('NPPF'). The NPPF has subsequently been supplemented by the National Planning Practice Guidance ('NPPG'). In February 2019, the government issued a revised NPPF and amendments to the NPPG were issued in May 2019 and September 2019.
- 2.30 The 2012 NPPF provided more in-depth guidance on viability of development than Planning Policy Statement 3, which limited its attention to requiring local planning authorities to test the viability of their affordable housing targets. The 2012 NPPF required that local planning authorities have regard to the impact on viability of the cumulative effect of all their planning requirements on viability. Para 173 of the 2012 NPPF required that local planning authorities give careful attention *"to viability and costs in plan-making and decision-taking"*. The 2012 NPPF required that *"the sites and 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 viably is threatened"*. After taking account of policy requirements, land values should be sufficient to *"provide competitive returns to a willing landowner and willing developer"*. The 2019 NPPF places less emphasis on viability and states that, *"plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan"* (Para 34, emphasis added).
- 2.31 The meaning of benchmark land value for the purposes of establishing viability in accordance with the NPPF and NPPG has been the subject of considerable debate since the publication of the 2012 NPPF. For the purposes of testing the viability of a Local Plan, the Local Housing Delivery Group concluded that the current use value of a site (or a credible alternative use value) plus an appropriate uplift, represents a competitive return to a landowner. Some members of the RICS consider that a competitive return is determined by market value, although there is no consensus around this view. The government's 2019 NPPF removes the requirement for *"competitive returns"* in the 2012 NPPF and is silent on how landowner returns should be assessed. The May 2019 NPPG (Paragraph: 013 Reference ID: 10-013-20190509) indicates that viability testing of plans should be based on existing use value plus a landowner premium.

CIL Policy Context

- 2.32 As of April 2015 (or the adoption of a CIL Charging Schedule by a charging authority, whichever was the sooner), the S106/planning obligations system' i.e. the use of 'pooled' S106 obligations, was limited to a maximum of five S106 agreements. Haringey implemented its first CIL Charging Schedule on 1 November 2014 so had a means of collecting contributions towards community infrastructure at the point at which the limitations on the pooling of planning obligations through S106 came into effect. However, changes in the CIL regulations in September 2019 have removed the pooling restrictions, giving charging authorities a degree of flexibility in how they use Section 106 and CIL. The adoption of a CIL charging schedule is discretionary for a charging authority.
- 2.33 It is worth noting that some site-specific S106 obligations remain available for negotiation, however these are restricted to site specific mitigation that meet the three tests set out at CIL regulation 122 and paragraph 56 of the NPPF and to the provision of affordable housing.

- 2.34 The CIL regulations state that in setting a charge, local authorities must strike “an appropriate balance” between securing enough revenue to fund necessary infrastructure on the one hand and the potentially adverse impact upon the viability of development on the other. The regulations also state that charging authorities should take account of other sources of available funding for infrastructure when setting CIL rates. This report deals with viability only and does not consider other sources of funding.
- 2.35 The 2019 CIL Regulations amendments have sought to streamline the adoption process of charging schedules. From September 2019, the previous two-stage consultation has been amended to require a single consultation with stakeholders. Following consultation, a charging schedule must be submitted for independent examination. The NPPG identifies at Para 032 Ref ID: 25-032-20190901 that, *“It is for charging authorities to decide how they wish to consult. The regulations do not specify for how long or how many times charging authorities should consult because charging authorities are best placed to decide how to engage with their local communities and other relevant parties. Where authorities are introducing the levy for the first time, or making significant changes to their levy, the expectation is that charging authorities will consult for a minimum of 4 weeks. Conversely, where only minor changes are proposed a shorter consultation period may be considered appropriate”*. It will then be for Examiners to, *“consider whether charging authorities have given adequate time for consultation on a draft charging schedule, particularly for consultations of less than 4 weeks. In doing so, they should take into account the scale and complexity of the changes proposed”*.
- 2.36 The payment of CIL is mandatory on all new buildings and extensions to buildings with a gross internal floorspace over 100 square metres or comprising a new dwelling once a charging schedule has been adopted. The CIL Regulations (as amended) still allow a number of reliefs and exemptions from CIL. Firstly, affordable housing and buildings with other charitable uses (if a material interest in the land is owned by the charity and the development is to be used wholly or mainly for its charitable purpose) are subject to relief. Secondly, local charging authorities may, if they choose, elect to offer exceptional relief from CIL on proven viability grounds. A local charging authority wishing to offer exceptional circumstances relief in its area must first give notice publicly of its intention to do so. The local authority can then consider claims for relief on chargeable developments from landowners on a case-by-case basis, as permitted by Regulation 50. In each case, an independent expert with suitable qualifications and experience must be appointed by the claimant with the agreement of the local authority to assess whether paying the full CIL charge would have an unacceptable impact on the development’s economic viability.
- 2.37 The exemption would be available for 12 months, after which time viability of the scheme concerned would need to be reviewed if the scheme has not commenced. To be eligible for exemption, Regulation 55 states that the Applicant must enter into a Section 106 agreement; and that the Authority must be satisfied that granting relief would not constitute state aid. It should be noted however that CIL cannot simply be negotiated away or the local authority decide not to charge CIL.
- 2.38 CIL Regulation 40/Schedule 1 includes a vacancy period test for calculating CIL liability so that vacant floorspace can be offset in certain circumstances. That is where a building that contains a part, which has not been in lawful use for a continuous period of at least six months within the last three years, ending on the day planning permission first permits the chargeable development, the floorspace may not be offset.
- 2.39 The CIL Regulations enable local authorities to set differential rates (including zero rates) for different zones within which development would take place and also for different types of development. The CIL Guidance set out in the NPPG (Para 023 Ref ID: 25-022-2019090125-022-20140612) clarifies that CIL Regulation 13 permits charging authorities to levy *“apply differential rates in a flexible way [including] in relation to geographical zones with*

the charging authority's boundary; types of development; and/or scales of development".

Charging authorities taking this approach need to ensure that such different rates are justified by a comparative assessment of the economic viability of those categories of development. Further, the NPPG clarifies that the definition of "use" for this purpose is not tied to the classes of development in the Town and Country Planning Act (Use Classes) Order 1987, although that Order does provide a useful reference point. The NPPG also sets out (Para 024 Ref ID: 25-024-2019090) that charging authorities may also set differential rates in relation to, scale of development i.e. by reference to either floor area or the number of units or dwellings.

- 2.40 The CIL Regulations set out clear timescales for payment of CIL, which are varied according to the size of the payment, which by implication is linked to the size of the scheme and s allow charging authorities to set their own timescales for the payment of CIL under Regulation 69B if they choose to do so. This is an important issue for a Charging Authority to consider as the timing of payment of CIL can have an impact on an Applicant's cashflow (the earlier the payment of CIL, the more interest the Applicant will bear before the development is completed and sold). To this end, we note that Haringey has an Instalments Policy in place for its adopted Charging Schedule.
- 2.41 The Government published the findings of the independent CIL review alongside the Housing White Paper in February 2017. The White Paper identified at Para 2.28 that the Government will *"continue to support the existing principle that developers are required to mitigate the impacts of development in their area, in order to make it acceptable to the local community and pay for the cumulative impacts of development on the infrastructure of their area."* The White Paper summarised the main finding of the CIL review to be that *"the current system is not as fast, simple, certain or transparent as originally intended."*
- 2.42 As a result, the Government committed to respond to the independent review and examine the options for reforming the system of developer contributions including ensuring direct benefit for communities. Revised regulations came into effect on 1 September 2019, which introduced the following changes:
- Consultation requirements to be amended to remove the current two-stage consultation process and replace this with a single consultation.
 - Removal of the pooling restrictions contained within Regulation 123.
 - Charging authorities will no longer be required to publish a Regulation 123 list.
 - Changes to calculations of chargeable amounts in different cases, including where the granting of an amended scheme under Section 73 leads to an increased or decreased CIL liability.
 - Removal of provisions which resulted in reliefs being lost if a commencement notice was not served before a developer starts a development. A surcharge will apply in future but the relief will not be lost.
 - Introduction of 'carry-over' provisions for a development, which is amended by a Section 73 permission, providing the amount of relief does not change.
 - Charging authorities are to be required to publish an annual infrastructure funding statement, setting out how much CIL has been collected and what it was spent on. Similar provisions to be introduced for Section 106 funds.
 - Charging authorities to publish annual CIL rate summaries showing the rates after indexation.

Mayoral CIL

- 2.43 The Council is required to calculate, collect and enforce the Mayoral CIL. Haringey falls within Mayoral CIL Zone 2 of the adopted Mayoral CIL Charging Schedule (MCIL2). A CIL charge of £60 per square metre is levied on most development excluding health and education.
- 2.44 This study takes into consideration the implications of the appropriate costs associated with MCIL2.

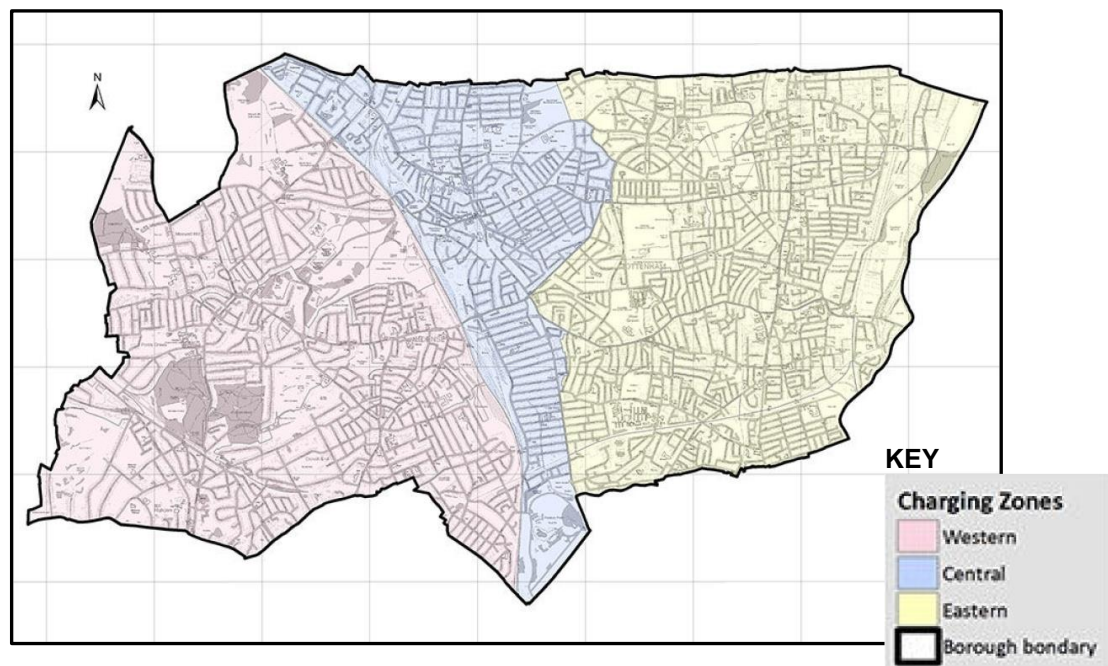
Haringey CIL

- 2.45 The Council approved its current CIL Charging Schedule in July 2014 and it came into effect on 1 November 2014. Table 2.45.1 below summarises the rates of CIL charged and Figure 2.45.1 provides a map of the CIL Charging Zones.

Table 2.45.1: CIL rates in the adopted Charging Schedule

Use	Western	Central	Eastern
Residential	£265	£165	£15
Student Accommodation	£265	£165	£15
Supermarkets ⁴	£95		
Retail Warehousing ⁵	£25		
Office, industrial, warehousing, small scale retail (use class A1-A5)	Nil		
Health, school and higher education	Nil		
All other uses	Nil		

Figure 2.45.1: Map of CIL rates in the adopted Charging Schedule



⁴ Superstores /supermarkets are defined as shopping destinations in their own right where weekly food shopping needs are met and which can also include non-food floorspace as part of the overall mix of the units.

⁵ Retail warehouses are large stores specialising in the sale of household goods (such as carpets, furniture and electrical goods), DIY items and other ranges of goods, catering mainly for bar borne customers.

Local Policy context

- 2.46 This study takes into account the policies and standards set out within Haringey's adopted Local Plan policies, which includes the following four documents;
- Strategic Policies DPD 2013-2026 (March 2013, consolidated with alterations 2017) – formerly the Core Strategy ('SP');
 - Development Management DPD (July 2017);
 - Site Allocations DPD (July 2017); and
 - Tottenham Area Action Plan ('AAP' July 2017) DPD.
- 2.47 These policies and standards include *inter alia* affordable housing requirements; sustainability; open space; and developer contributions towards infrastructure. There are numerous policy requirements that are now embedded in base build costs for schemes (i.e. secure by design, landscaping, amenity space, internal space standards etc.). This study takes into account the cumulative impact of the additional policy requirements above base build costs as required by the NPPF. In addition, it has regard to policies within the London Plan 2016 which also forms part of the relevant plan for the borough as set out in the NPPG.
- 2.48 We set out a summary of the policies identified as having cost implications for developments below:
- Strategic Policies DPD Policy SP4: Working towards a Low Carbon Haringey - Requires all new non-residential development to be built to at least BREEAM "very good" standard and should aim to achieve BREEAM "excellent" or the current nationally agreed standard
 - Strategic Policies DPD: Policy SP2: Housing:
 - (4) 90% of new housing meets Building Regulation requirement M4(2) 'accessible and adaptable dwellings and 10% meeting Building Regulations requirement M4(3) 'wheelchair user dwelling',
 - (5) Subject to viability, 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;
 - (6) Delivering an affordable housing tenure split of 60% affordable rent (including social rent) and 40% intermediate housing; and
 - (8) The preferred affordable housing mix, in terms of unit size and types of dwellings on individual schemes will be determined through negotiation, scheme viability assessments and driven by up-to-date assessments of local housing needs, as set out in the Haringey Housing Strategy.
 - Development Management DPD:
 - Policy DM13: Affordable Housing: seeks the maximum reasonable amount of affordable housing provision on sites with the capacity to accommodate more than 10 dwellings having regard to:
 - Policy SP2 - borough-wide target of 40% affordable housing provision;
 - 60% provision to be social/affordable rent and 40% intermediate housing;
 - The preferred affordable housing size mix as set out in the Council's Housing Strategy;
 - The individual circumstances of the site;
 - The availability of public subsidy;
 - Development viability; and
 - Other planning benefits that may be achieved.
 - Policy DM15: Specialist Housing – identifies that proposals for student accommodation will need to demonstrate that the accommodation can be secured by agreement for occupation by members of a specified educational institution(s), or the proposal will provide an element of affordable student accommodation.
 - Policy DM21: Sustainable Design, Layout and Construction – identifies that all new development, including building and landscape works, will be expected to consider

and implement sustainable design, layout and construction techniques (as set out in the London Plan Policy 5.3).

- Policy DM39: Warehouse Living – identifies that the Council will support proposals for warehouse living that form part of an agreed masterplan to increase and diversify the employment offer of these employment areas whilst providing an appropriate standard of living for the integrated residential element.
- Policy DM48: Use of Planning Obligations – identifies that proposals should make adequate provision for affordable housing, infrastructure and other requirements such as essential site-specific transport infrastructure, and employment contributions made necessary by the development, either through appropriate on-site provision or a planning obligation.
- Tottenham AAP:
 - Policy AAP3: Housing – identifies that the affordable housing tenure split in the Tottenham AAP area should be provided at 60% intermediate and 40% affordable rented accommodation.

Development context

- 2.49 The Council's SP DPD identifies that, *"the borough covers an area of more than 11 square miles. Its most familiar local landmarks include Alexandra Palace, Bruce Castle and Tottenham Hotspur Football Stadium"*. It goes on to highlight that the borough *"is strategically located in the London-Stansted-Cambridge-Peterborough growth area"* and that it has, *"strong links to the City, West End and Stansted Airport"* and on this basis it is, *"well placed for both business and commuting"*.
- 2.50 The SP DPD indicates that the borough has a resident population of circa 230,000 people and there is a high demand for housing across all tenures. In particular, it highlights that *"the need for affordable housing outstrips supply, with a shortfall in provision of 4,865 units per annum, or 52 per 1,000 head of population - outstripping the average Inner London shortfall of 32 units per 1000 head of population"*. The SP DPD forecasts that by 2026, the population will have increased to over 260,000, which equates to an increase of over 15%.
- 2.51 The SP DPD highlights Haringey's strategic housing target has been significantly increased by the London Plan from 820 homes per annum (as identified previously) to 1,502 homes per annum, effective from April 2015, which equates to an increase of 83%.
- 2.52 The DP DPD indicates that a key area of residential development in the borough will be the *"new Housing Zone designation to be applied to Tottenham Hale, which will see significant public and private investment committed to the area to unlock its development potential and accelerate housing delivery, prompting the Council to prepare a comprehensive regeneration framework for the area along with a dedicated Area Action Plan"*.
- 2.53 The AAP identifies *"land capable of delivering 10,000 new homes and 5,000 new jobs. It provides a legal basis for developments including establishing a new retail centre at Tottenham Hale, the intensification and diversification of existing industrial estates, and mixed leisure development around Tottenham Hotspur stadium."*
- 2.54 The adopted SP DPD highlights that Haringey has a *"relatively large amount of industrial land"* and that *"in the past, this land provided many jobs for manufacturing"*. However, manufacturing has declined and the Council now considers that it needs *"to plan for new jobs to replace those being lost and to provide jobs for the increasing population"*. This is complicated by the fact that *"many working residents in Haringey travel to work outside of the borough"* and as a result *"travel to work patterns have become increasingly complex"*. The SP DPD identifies that the borough will, *"diversify and grow the economy - supporting business and job growth, addressing the borough's worklessness by increasing the skills and employability of local people, encouraging enterprise and inward investment, protecting employment land, strengthening Haringey's town centres and planning for retail growth"*.

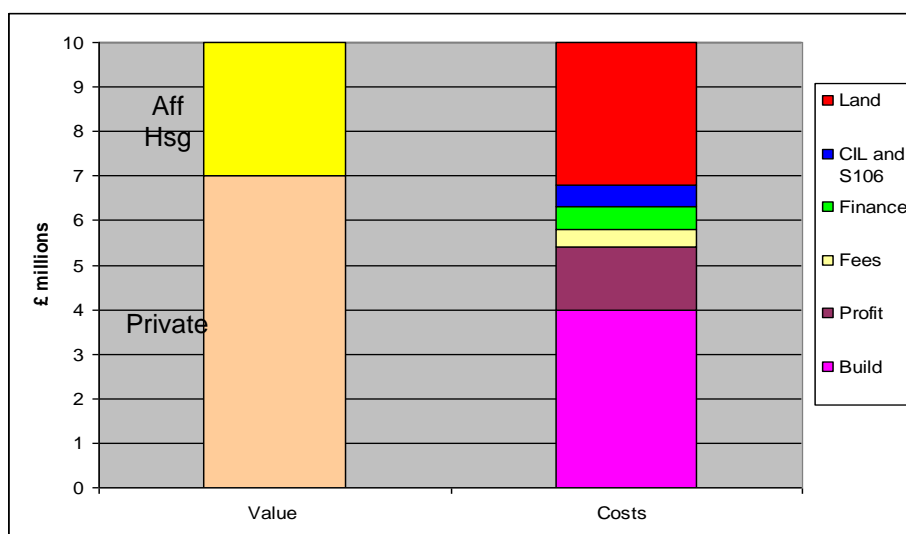
- 2.55 Developments in Haringey range from conversions of existing buildings to small in-fill sites to major regeneration schemes. The bulk of development (in terms of volume of units) is expected to come forward on sites in the east of the borough. The property market has improved since the 2013 CIL viability report was produced, particularly in the east of the borough which has seen significant improvement.

3 Methodology and appraisal inputs

- 3.1 The NPPG on CIL identifies at Para 020 Ref ID: 25-020-20190901 that “*charging authorities should use an area based approach, involving a broad test of viability across their area, as the evidence to underpin their charge*”. The NPPG goes on to identify that, “*there are a number of valuation models and methodologies available to charging authorities to help them in preparing this evidence. Charging authorities should use evidence in accordance with planning practice guidance on viability*”.
- 3.2 Our methodology follows standard development appraisal conventions, which is advocated by the NPPG on Viability, using locally-based sites and assumptions that reflect local market circumstances and planning policy requirements. The study is therefore specific to Haringey and reflects the Council’s planning policy requirements.

Approach to testing development viability

- 3.3 Appraisal models can be summarised via the following diagram. The total scheme value is calculated, as represented by the left hand bar. This includes the sales receipts from the private housing (the peach portion) and the payment from a Registered Provider (‘RP’) for the completed affordable housing units (the yellow portion). For a commercial scheme, scheme value equates to the capital value of the rental income after allowing for rent free periods and purchaser’s costs. The model then deducts the build costs, fees, interest, CIL, Section 106 contributions and developer’s profit. A ‘residual’ amount is left after all these costs are deducted – this is the land value that the Developer would pay to the landowner. The residual land value is represented by the red portion of the right hand bar in the diagram.



- 3.4 The Residual Land Value is normally a key variable in determining whether a scheme will proceed. If a proposal generates sufficient positive land value (in excess of existing use value, discussed later), it will be implemented. If not, the proposal will not go ahead, unless there are alternative funding sources to bridge the ‘gap’.
- 3.5 Problems with key appraisal variables can be summarised as follows:
- Development costs are subject to national and local monitoring and can be reasonably accurately assessed in ‘normal’ circumstances. In boroughs like Haringey, most sites will be previously developed. These sites can sometimes encounter ‘exceptional’ costs such as decontamination. Such costs can be very difficult to anticipate before detailed site surveys are undertaken but should in normal circumstances be reflected in bids for sites from developers;

- Assumptions about development phasing, phasing of Section 106 contributions and infrastructure required to facilitate each phase of the development will affect residual values. Where the delivery of the obligations is deferred, the less the real cost to the applicant (and the greater the scope for increased affordable housing and other planning obligations). This is because the interest cost is reduced if the costs are incurred later in the development cashflow; and
 - While Developer's Profit has to be assumed in any appraisal, its level is closely correlated with risk. The greater the risk, the higher the profit level required by lenders. While profit levels were typically around 15% of completed development value at the peak of the market in 2007, banks currently require schemes to show a profit level that is reflective of current perceived risk. Typically developers and banks have been targeting between 17% to 20% profit on value of the private housing element dependant on the nature of the scheme.
- 3.6 Ultimately, the landowner will make a decision on implementing a project on the basis of return and the potential for market change, and whether alternative developments might yield a higher value. The landowner's 'bottom line' will be achieving a residual land value that sufficiently exceeds 'existing use value⁶' or another appropriate benchmark to make development worthwhile. The margin above existing use value may be considerably different on individual sites, where there might be particular reasons why the premium to the landowner should be lower or higher than other sites.
- 3.7 Clearly, however, landowners have expectations of the value of their land which often exceed the value of the current use. Ultimately, if landowners' expectations are not met, they will not voluntarily sell their land and (unless a Local Authority is prepared to use its compulsory purchase powers) some may simply hold on to their sites, in the hope that policy may change at some future point with reduced requirements. However, the communities in which development takes place also have reasonable expectations that development will mitigate its impact, in terms of provision of community infrastructure, which will reduce land values. It is within the scope of those expectations that developers have to formulate their offers for sites. The task of formulating an offer for a site is complicated further still during buoyant land markets, where developers have to compete with other developers to secure a site, often speculating on increases in value.

Viability benchmark

- 3.8 In February 2019, the government published a revised NPPF, which indicates at para 34 that *"Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, green and digital infrastructure). Such policies should not undermine the deliverability of the plan"*. The NPPF is not prescriptive on the type of methodology local planning authorities should use when assessing viability. The NPPG on Viability indicates that benchmark land value should be based on existing use value, plus a premium for the landowner. It goes on to note *"the premium for the landowner should reflect the minimum return at which it is considered a reasonable landowner would be willing to sell their land. The premium should provide a reasonable incentive, in comparison with other options available, for the landowner to sell land for development while allowing a sufficient contribution to fully comply with policy requirements"* (Para 013, Ref ID 10-103-20190509).
- 3.9 Guidance from other planning bodies is also helpful in understanding benchmark land value. The Mayor's Affordable Housing and Viability SPG focuses on decision making in development management, rather than plan making, but indicates that benchmark land values should be based on existing use value plus a premium which should be *"fully justified"*

⁶ For the purposes of this report, existing use value is defined as the value of the site in its existing use, assuming that it remains in that use. We are not referring to the RICS Valuation Standards definition of 'Existing Use Value'.

based on the income generating capacity of the existing use with reference to comparable evidence on rents, which excludes hope value associated with development on the site or alternative uses”.

- 3.10 The Local Housing Delivery Group published guidance⁷ in June 2012 provides guidance on testing viability of Local Plan policies. The guidance notes that *“consideration of an appropriate Threshold Land Value [or viability benchmark] needs to take account of the fact that future plan policy requirements will have an impact on land values and landowner expectations. Therefore, using a market value approach as the starting point carries the risk of building-in assumptions of current policy costs rather than helping to inform the potential for future policy”.*
- 3.11 In light of the weaknesses in the market value approach, the Local Housing Delivery Group guidance recommends that benchmark land value *“is based on a premium over current use values”* with the *“precise figure that should be used as an appropriate premium above current use value [being] determined locally”*. The guidance considers that this approach *“is in line with reference in the NPPF to take account of a “competitive return” to a willing land owner”*.
- 3.12 The examination on the Mayor of London’s first CIL charging schedule in January 2012 considered the issue of an appropriate land value benchmark. The Mayor had adopted existing use value, while certain objectors suggested that ‘Market Value’ was a more appropriate benchmark. The Examiner concluded that:
- “The market value approach.... while offering certainty on the price paid for a development site, suffers from being based on prices agreed in an historic policy context.” (paragraph 8)* and that *“I don’t believe that the EUV approach can be accurately described as fundamentally flawed or that this examination should be adjourned to allow work based on the market approach to be done” (Para 9).*
- 3.13 In his concluding remark, the Examiner points out that
- “the price paid for development land may be reduced [so that CIL may be accommodated]. As with profit levels there may be cries that this is unrealistic, but **a reduction in development land value is an inherent part of the CIL concept.** It may be argued that such a reduction may be all very well in the medium to long term but it is impossible in the short term because of the price already paid/agreed for development land. The difficulty with that argument is that if accepted the prospect of raising funds for infrastructure would be forever receding into the future. In any event in some instances it may be possible for contracts and options to be re-negotiated in the light of the changed circumstances arising from the imposition of CIL charges” (Para 32 – emphasis added).*
- 3.14 It is important to stress, therefore, that there is no single threshold land value at which land will come forward for development, particularly in urban areas. The decision to bring land forward will depend on the type of owner and, in particular, whether the owner occupies the site or holds it as an asset; the strength of demand for the site’s current use in comparison to others; how offers received compare to the owner’s perception of the value of the site, which in turn is influenced by prices achieved by other sites. Given the lack of a single threshold land value, it is difficult for policy makers to determine the minimum land value that sites should achieve. This will ultimately be a matter of judgement for each planning authority.
- 3.15 Respondents to consultations on planning policy documents in other authorities in London have made various references to the 2012 RICS Guidance on ‘Viability in Planning’ and have suggested that charging authorities should run their analysis using benchmark land values based on market values. This would be an extremely misleading measure against

⁷ Viability Testing Local Plans: Advice for planning practitioners, Local Housing Delivery Group, Chaired by Sir John Harman, June 2012

which to test viability, as market values should reflect *existing policies already in place*, and would consequently tell us nothing as to how future (as yet un-adopted) policies might impact on viability. It has been widely accepted elsewhere that market values are inappropriate for testing planning policy requirements.

- 3.16 Relying upon historic transactions is a fundamentally flawed approach, as offers for these sites will have been framed in the context of current planning policy requirements, so an exercise using these transactions as a benchmark would tell the Council nothing about the potential for sites to absorb as yet unadopted policies. Various Local Plan inspectors and CIL examiners have accepted the key point that Local Plan policies and CIL will ultimately result in a reduction in land values, so benchmarks must consider a reasonable minimum threshold, which landowners will accept. For local authority areas such as Haringey, where the vast majority of sites are previously developed, the 'bottom line' in terms of land value will be the value of the site in its existing use. This fundamental point is recognised by the RICS at paragraph 3.4.4. of their Guidance Note on 'Financial Viability in Planning':

"For a development to be financially viable, any uplift from current use value to residual land value that arises when planning permission is granted should be able to meet the cost of planning obligations while ensuring an appropriate Site Value for the landowner and a market risk adjusted return to the developer in delivering that project (the NPPF refers to this as 'competitive returns' respectively). The return to the landowner will be in the form of a land value in excess of current use value".

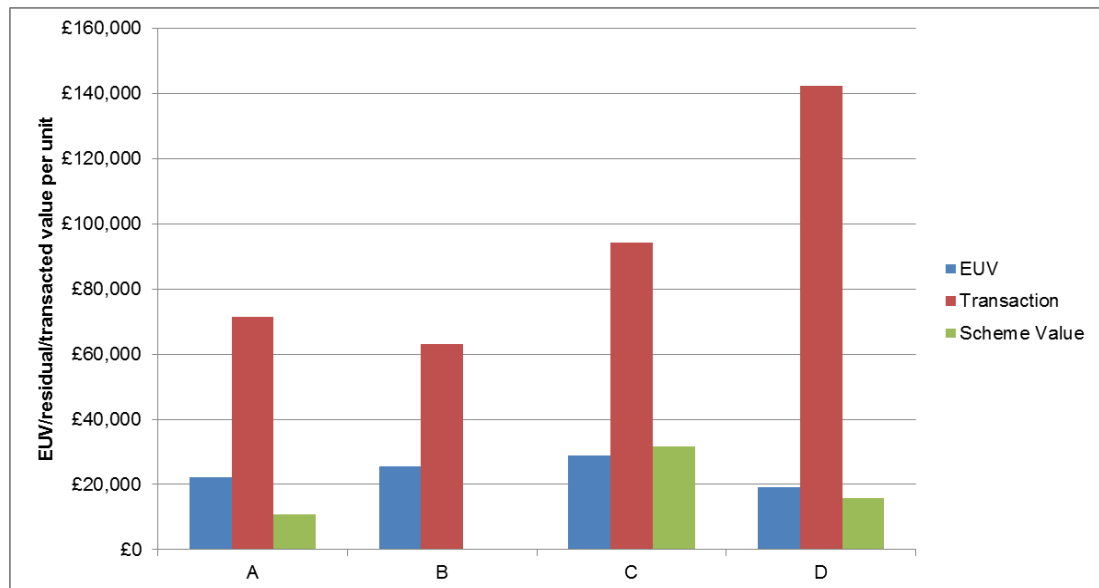
- 3.17 The Guidance goes on to state that *"it would be inappropriate to assume an uplift based on set percentages ... given the diversity of individual development sites"*.

- 3.18 Commentators also make reference to 'market testing' of benchmark land values. This is another variant of the benchmarking advocated by respondents outlined at paragraph 3.15. These respondents advocate using benchmarks that are based on the prices that sites have been bought and sold for. There are significant weaknesses in this approach which none of the respondents who advocate this have addressed. In brief, prices paid for sites are a highly unreliable indicator of their actual value, due to the following reasons:

- Transactions are often based on bids that 'take a view' on squeezing planning policy requirements below target levels. This results in prices paid being too high to allow for policy targets to be met. If these transactions are used to 'market test' CIL rates, the outcome would be unreliable and potentially highly misleading.
- Historic transactions of housing sites are often based on the receipt of grant funding, which is no longer available in most cases.
- There would be a need to determine whether the developer who built out the comparator sites actually achieved a profit at the equivalent level to the profit adopted in the viability testing. If the developer achieved a sub-optimal level of profit, then any benchmarking using these transactions would produce unreliable and misleading results.
- Developers often build assumptions of growth in sales values into their appraisals, which provides a higher gross development value than would actually be achieved today. Given that our appraisals are based on current values, using prices paid would result in an inconsistent comparison (i.e. current values against the developer's assumed future values). Using these transactions would produce unreliable and misleading results.

- 3.19 These issues are evident from a recent BNP Paribas Real Estate review of evidence submitted in viability assessments where the differences between the value ascribed to developments by applicants and the amounts the sites were purchased for by the same parties. The prices paid exceeded the value of the consented schemes by between 52% and 1,300%, as shown in Figure 3.19.1. This chart compares the residual value of four central London development proposals to the sites' existing use values and the price, which the developers paid to acquire the sites (all the data is on a per unit basis).

Figure 3.19.1: Comparison of scheme residual value to existing use value and price paid for site



- 3.20 The issue is recognised in the May 2019 revisions to the PPG, which draw attention to the propensity for prices paid for sites to exceed benchmark land values *“due to different assumptions and methodologies used by individual developers, site promoters and landowners”* (Para 014, Ref ID 10-014-20190509). As a consequence, the NPPG goes on to identify in the same para that market evidence, *“should not be used in place of benchmark land value [as] there may be a divergence between benchmark land values and market evidence”*.
- 3.21 NPPG recognises the concerns we have outlined above in relation to the differences between purchase prices/market values, the proposed residual value of the scheme and an existing use benchmark value. As a consequence, the NPPG stresses on no fewer than five separate occasions that, *“price paid for land”* should not be reflected in viability assessments.
- 3.22 For the reasons set out above, the approach of using current use values is a more reliable indicator of viability than using market values or prices paid for sites, as advocated by certain observers. Our assessment follows this approach, as set out in Section 4.

4 Development appraisals

Residential development

- 4.1 We have appraised eight residential development typologies, reflecting both the range of sales values/capital values and also sizes/types of development and densities of development across the Eastern CIL Zone. The Council has considered these in light of historic planning applications and knowledge of anticipated future development within the borough. These typologies are therefore reflective of developments that have been consented/delivered as well as those expected to come forward in the eastern part of the borough in future.
- 4.2 Details of the schemes selected for testing purposes are provided below in Table 4.2.1. A consistent unit mix has been adopted for both private and affordable tenures, as shown in Table 4.2.2. The unit mix varies between type of development.

Table 4.2.1: Development typologies

Typology No.	Number of units	Housing type	Development density units per ha	Net developable area (ha)
1	5	Houses	50	0.100
2	10	Flats	140	0.071
3	11	Flats	140	0.079
4	25	Flats	140	0.179
5	50	Flats	160	0.313
6	100	Flats	250	0.400
7	250	Flats	250	1.000
8	500	Flats	250	2.000

Table 4.2.2: Unit Mix (across all tenures taken together)

Site type	1 Bed flat	2 bed flat	3 bed flat	2 bed house	3 bed house	4 bed house
<i>Size (sq m)</i>	50	70	86	79	93	115
1	-	-	-	20%	40%	40%
2	30%	40%	30%			
3	30%	40%	30%			
4	30%	40%	30%			
5	30%	40%	30%	-	-	-
6	40%	40%	20%	-	-	-
7	40%	45%	15%	-	-	-
8	40%	45%	15%			

- 4.3 With respect to the size of units adopted in the study, these have been informed by the minimum gross internal floor areas set out in the London Plan, which conform with MHCLG's Technical Housing Standards' Nationally Described Space Standard published in March 2015.

Residential sales values

- 4.4 Residential values in the area reflect national trends in recent years but do of course vary between different sub-markets. We note that since our 2012 CIL Viability report was published (with research undertaken in 2011), the Land Registry's database identifies that house prices in the borough have increased by circa 64% and the research we have undertaken specific to the east of the Borough has identified that values have more than doubled.
- 4.5 We reviewed residential values in the East of the borough in early 2017 using online database sources including Molior, Rightmove and Land Registry as well as pricing schedules submitted by developers with planning applications. This exercise indicates that developments in the Eastern CIL Zone attract average sales values of between circa £5,113 per square metre (£475 per square foot) and £6,728 per square metre (£625 per square foot). However, since then the Eastern CIL Zone residential markets have continued to improve and in particular, significant regeneration schemes have been consented and or come forward. This has changed the profile of the Eastern CIL Zone's residential sales values, with new build developments across the area identified as achieving or able to achieve similar values, at the higher end of the scale. In particular, we are aware that the viability evidence submitted by Tottenham Hotspur Football Club for the Tottenham Goods Yard ⁸ appeal, agreed in a Statement of Common Ground in May 2019, which confirmed that sales values achievable would be akin to those achieved in the regeneration schemes in Tottenham Hale at £7,373 per square metre (£685 per square foot)..
- 4.6 In light of this we have adopted the average sales value set out in Table 4.6.1 in our appraisals, which reflects the flatter structure of residential sales values now achievable in developments across the area under consideration in this Study.

Table 4.6.1: Average sales values adopted in appraisals

Area	Ave values £s per sq m	Ave values £s per sq ft
Eastern CIL Zone	6,728	625

- 4.7 As noted earlier in the report, both Knight Frank and Savills predict that sales values will increase over the medium term. Whilst this predicted growth cannot be guaranteed, we have run a sensitivity analysis assuming growth in sales values of 10%, accompanied by cost inflation of 5%. This sensitivity analysis provides the Council with an indication of the impact of changes in values and costs on scheme viability.

Affordable housing tenure and values

- 4.8 The Council's policy position seeks the maximum reasonable amount of affordable housing on sites with the capacity to accommodate 10 units or more subject to viability, with a borough wide target of 40% affordable housing. The Council seeks a tenure split of 60% Social / Affordable Rent and 40% intermediate housing with the exception of sites located within the Tottenham AAP area, where the tenure split is sought at 60% intermediate and 40% Affordable Rented accommodation.
- 4.9 We note the Council's preference in the updated Appendix C of the Council's Housing Strategy 2017-2022 (February 2019) is as follows:
- low cost rented housing for general needs: social rent at target rent levels – rather than Affordable Rent or London Affordable Rent; and

⁸ The Goods Yard 36 And 44-52 White Hart Lane, N17 8DP – Refs: HGY/2018/0187, HGY/2018/0188, APP/Y5420/W/18/3204591 & APP/Y5420/W/18/3204592

- intermediate housing: the Council is keen to promote a range of intermediate housing i.e. Shared Ownership is not the preferred product in all cases, Discounted Market Rent with rents set at London Living Rent levels is the preferred option and.

4.10 We have therefore undertaken our appraisals testing the following affordable housing tenure scenarios:

- Affordable Rent ('AR') and Shared Ownership ('SO');
- London Affordable Rent ('LAR') and SO;
- Social Rent ('SR') and SO; and
- SR and Discount Market Rent ('DMR') at London Living Rents ('LLR').

4.11 Our appraisals including AR assume that rents that do not exceed Local Housing Allowance ('LHA') rates, so that they are affordable to households subject to the Universal Credit, as shown in Table 4.11.1. The approach adopted is therefore consistent with the rent caps announced in the Autumn Statement in November 2015. It should be noted that the LHAs are lower than market rents. Prior to the 2015 Autumn Statement, rents for affordable rented units could have (in theory) been set as high as 80% of market rents (inclusive of service charges), but this is no longer an option.

Table 4.11.1: Weekly rents and Local Housing Allowance limits

Unit type	Local Housing Allowance per week	Rent assumed in appraisals per week	Rent as a percentage of Local Housing Allowance
1 bed	£199.68	£186.22	93%
2 beds	£255.34	£241.88	95%
3 beds	£315.12	£301.66	96%
4 or more beds	£388.65	£375.19	97%

4.12 For LAR units we have adopted the 2019-2020 rents published by the GLA as set out in Table 4.12.1 below. For LLR we have adopted a conservative position assuming the lowest rents identified in the GLA's published LLR ward rent data for 2019-2020 as set out Table 4.12.1.

Table 4.12.1: GLA published 2019-2020 LAR and LLR Weekly rents

Unit type	LAR per week 2019/2020 (exclusive of service charge)	LLR per week 2019/2020 White Hart Lane Ward (inclusive of service charge)
1 bed	£155.13	£161.03
2 beds	£164.24	£178.93
3 beds	£173.37	£196.82
4 or more beds	£182.49	£214.71

4.13 We have used our bespoke model which replicates how RPs undertake such appraisals to value the rented (AR, LAR, SR and LLR) affordable housing tenures. This model runs cashflows for the rented tenures in the Eastern CIL Zone area over a period of circa 35 years, which capitalises the net rental income stream. With respect to the SR

accommodation the model calculates the gross rent for these properties derived from a combination of relative property values (as at January 1999) and relative local earnings. The net rent is calculated by taking into account factors such as standard levels for individual registered providers (RP's) management and maintenance costs; finance rates currently obtainable in the sector; allowances for voids and bad debt.

- 4.14 RPs are permitted to increase rents by CPI plus 1% per annum and we have reflected this in our appraisals.
- 4.15 For shared ownership units, we have assumed that RPs will sell 25% initial equity stakes and charge a rent of 2.75% on the retained equity. A 10% charge for management is deducted from the rental income and the net amount is capitalised using a yield of 5%.
- 4.16 The CLG/HCA 'Shared Ownership and Affordable Homes Programme 2016-2021: Prospectus' document clearly states that Registered Providers will not receive grant funding for any affordable housing provided through planning obligations on developer-led developments. The Mayor of London's "Homes for Londoners Affordable Housing Programme 2016-21 Funding Guidance" (November 2018) identifies that *"The Mayor has secured £3.15bn from the Government to fund new affordable homes for Londoners. This funding is expected to support starts for at least 90,000 new affordable homes in London through to 2021. The Mayor and Government have agreed at least 58,500 of this total will be a combination of London Living Rent and shared ownership"*. The guidance goes on to set out that *"The GLA will fund affordable housing through three different routes:*
- *The Approved Provider route, with a single set grant rate for London Affordable Rent at or below the benchmarks, and a different set grant rate for both London Living Rent and London Shared Ownership;*
 - *The Developer-led route, with a single set grant rate to increase the level of affordable homes provided on section 106 sites;*
 - *Negotiated grant rates mainly for supported and specialised housing, and for London Affordable Rent at levels above the benchmarks.*

The GLA does not expect to allocate its entire available grant in this programme through the initial bidding round. There will be further opportunities to bid on an ongoing basis, once the initial allocations are made".

- 4.17 We therefore consider that developments receiving grant funding will be the exception rather than the rule and consequently, all our appraisals, which we rely upon for testing Haringey's updated Eastern CIL Zone rates assume nil grant. Clearly where grant funding does become available over the plan period, it should facilitate an increase in the provision of affordable housing when developments come forward.

PRS

- 4.18 We have tested the 50 unit and 100 unit schemes (Typologies 5 and 6) delivered as PRS schemes in the borough. Based on PRS schemes in the borough we have adopted the unit mix as set out in table 4.18 below.

Table 4.18 Unit mix adopted in PRS testing

Site type	1 Bed flat	2 bed flat	3 bed flat	2 bed house	3 bed house	4 bed house
Size (sq m)	50	70	86	79	93	115
	40%	45%	15%	-	-	-

- 4.19 We have adopted the rents as set out in Table 4.19.1 below following research into rents achievable in PRS schemes in the area using the Molior London database and our knowledge of viability of PRS schemes coming forward in the area. We have capitalised these rents at a net yield of 3.75%, in line with market research published by Knight Frank⁹ and CBRE¹⁰. As we have adopted a net yield we have included an allowance at the upper end of the range of 25% for operating costs (this accounts for the costs of maintenance, lettings management, repairs, void periods, insurance, utilities and replacement of fixtures and fittings etc). We consider this to be a conservative allowance as in our experience this figure can be lower. We have tested the delivery of such schemes at a range of affordable housing (40% to 5%) provided as DMR units included at LLRs (as identified by the GLA). We have also tested the schemes as 100% market rental units. We have allowed for a developer return/profit level of 15% on the revenue given the reduced risk associated with this form of residential development, as many schemes are forward funded and the risks associated with void periods etc. are already factored into the 25% operating costs.

Table 4.19.1 Rents adopted in PRS testing

Unit type	Rent per month	London Living Rents per month ¹¹
1 bed	£1,300	£700
2 beds	£1,700	£778
3 beds	£2,500	£855

Residential Build costs

- 4.20 We have sourced build costs for the residential schemes from the RICS Building Cost Information Service ('BCIS'), which is based on tenders for actual schemes adjusted to reflect local circumstances in Haringey. However, adjustments to the base costs are necessary to reflect other factors which are not included in BCIS. In addition to the build costs outlined below, our appraisals include a contingency of 5% of build costs. Our approach is set out in the following paragraphs.
- 4.21 **Houses:** we have used the mean average BCIS 'Estate housing terraced – generally' cost, which is currently £1,343 per square metre. In addition to these base costs, we have included an allowance which equates to an additional 15% of the base cost for external works and 2% for demolition and site preparation costs. We have assumed a gross to net ratio of 100%.
- 4.22 **Flats:** we have used the mean average BCIS 'Flats – generally' cost, which is currently £1,634 per square metre for the lower density schemes in the borough (Typologies 2 and 3). For the medium density schemes (typologies 4 and 5) we have used the upper quartile BCIS 'Flats – generally', which is currently £1,836 per square metre. For high density schemes (typologies 6, 7 and 8) we have adopted the mean BCIS 'Flats – 6+ storeys', which is currently £2,055 per square metre. In addition to these base costs, we have included an allowance which equates to an additional 15% of the base cost for external works and 2% for demolition and site preparation costs. Our appraisals assume a gross to net ratio of between 75% and 80% for flats, depending on the density and notional height of each scheme.
- 4.23 A further allowance of 4% has been included to account for sustainability and accessibility policy requirements. This is in line with advice contained in the GLA's Housing Standards Review Viability Assessment published in May 2015 and prepared by David Lock Associates with Hoare Lea and Gardiner and Theobald. This identified that, *"the estimated cost impact of the optional access requirements represents circa an additional 2-2.4% of base build cost for small low rise developments which is where the requirement for step free access to all*

⁹ Knight Frank Residential Yield Guide Q1 2017

¹⁰ CBRE UK Residential Property Investment Yields March 2017

¹¹ We have adopted a cautious position allowing for the lowest LLR's based on Northumberland Park ward

homes is an additional requirement to current London Plan standards". It goes on to identify

that, "the estimated cost impact of moving to zero carbon homes in 2016 represents circa an additional 1-1.4% of base build cost." We note that the most recent London Plan Viability Study dated December 2017 indicates that to meet the proposed energy performance a premium of circa £1,500 per dwelling over base build costs is required, which is covered by the 1.4% allowance on base build costs identified above and included in our appraisals.

Professional fees

- 4.24 In addition to base build costs, schemes will incur professional fees covering design, valuation highways and planning consultants and the cost of preparing and submitting the planning application and so on. Our appraisals incorporate a 10% - 12% allowance, dependant on the typology, which is at the middle to higher end of the range for most schemes. The two larger typologies (7 and 8) incorporate a 12% allowance and the remainder a 10% allowance.

Development finance

- 4.25 Our appraisals assume that development finance can be secured at a rate of 7%, inclusive of arrangement and exit fees, which is considered to be a conservative assumption of current funding conditions.

Marketing costs

- 4.26 Our appraisals incorporate an allowance of 3% for marketing costs, which includes show homes and agents' fees, plus 0.5% for sales legal fees.

Acquisition costs

- 4.27 Our appraisals deduct Stamp Duty at 5%, acquisition agent's fees at 1%; and acquisition legal fees at 0.8% of residual land value.

Section 106 costs

- 4.28 To account for residual Section 106 requirements, we have included a notional allowance of £1,000 per unit for residential schemes. This is an estimate and actual sums sought vary according to site specific circumstances, however the figure is considered by the Council to be a reasonable proxy for the likely sums to be sought.

Mayoral CIL

- 4.29 As previously noted, Mayoral CIL has been payable on most developments that received planning consent from 1 April 2012 onwards. The Mayor's Charging Schedule for MCIL2 has been in effect from 1 April 2019. MCIL2 increased the charge in Haringey to £60 per square metre across the whole area. We have accordingly adopted the higher MCIL2 rates within our assessment.

Haringey CIL

- 4.30 As noted previously, the Council started charging CIL on 1 November 2014. The rates of Borough CIL are summarised in Table 4.30.1. As with Mayoral CIL the borough's Charging Schedule rates are also subject to annual indexation. The figures below reflect the adopted rates and in italics the 2017 inflated charging rates (i.e. inflated from November 2013 to April 2019).

Table 4.30.1: Haringey adopted and indexed CIL rates

Use	Western	Central	Eastern
Residential	£265 (£329.13)	£165 (£204.93)	£15 (£18.63)
Student Accommodation	£265 (£329.13)	£165 (£204.93)	£15 (£18.63)
Supermarkets ¹²	£95 (£117.99)		
Retail Warehousing ¹³	£25 (£31.05)		
Office, industrial, warehousing, small scale retail (use class A1-A5)	Nil		
Health, school and higher education	Nil		
All other uses	Nil		

- 4.31 The amended CIL Regulations specify that if any part of an existing building is in lawful use for 6 months within the 36 months prior to the time at which planning permission first permits development, all of the existing floorspace will be deducted when determining the amount of chargeable floorspace. This will be the case for many development sites in Haringey. However, for the purposes of our appraisals, we have assumed that there is no deduction for existing floorspace. This represents a worst-case scenario, as most sites in Haringey are likely to benefit from at least some off-setting of existing floorspace against proposed floorspace.

Development and sales periods

- 4.32 Development and sales periods vary between type of scheme. However, our sales periods are based on an assumption of a sales rate of up to 8 units per month. This is reflective of current market conditions, whereas in improved markets, a sales rate of up to 10-12 units per month might be expected. We also note that many schemes in London have sold entirely off-plan, in some cases well in advance of completion of construction. Clearly markets are cyclical and sales periods will vary over the economic cycle and the extent to which units are sold off-plan will vary over time.

Developer's profit

- 4.33 Developer's profit is closely correlated with the perceived risk of residential development. The greater the risk, the greater the required profit level, which helps to mitigate against the risk, but also to ensure that the potential rewards are sufficiently attractive for a bank and other equity providers to fund a scheme. In 2007, profit levels were at around 13-15% of GDV. However, following the impact of the credit crunch and the collapse in interbank lending and the various government bailouts of the banking sector, profit margins have increased. It is important to emphasise that the level of minimum profit is not necessarily determined by developers (although they will have their own view and the Boards of the major housebuilders will set targets for minimum profit).
- 4.34 The views of the banks which fund development are more important; if the banks decline an application by a developer to borrow to fund a development, it is very unlikely to proceed, as developers rarely carry sufficient cash to fund it themselves. Consequently, future movements in profit levels will largely be determined by the attitudes of the banks towards development proposals.

¹² Superstores /supermarkets are defined as shopping destinations in their own right where weekly food shopping needs are met and which can also include non-food floorspace as part of the overall mix of the units.

¹³ Retail warehouses are large stores specialising in the sale of household goods (such as carpets, furniture and electrical goods), DIY items and other ranges of goods, catering mainly for bar borne customers.

- 4.35 The near collapse of the global banking system in the final quarter of 2008 has resulted in a much tighter regulatory system, with UK banks having to take a much more cautious approach to all lending. In this context, and against the backdrop of the sovereign debt crisis in the Eurozone, the banks were for a time reluctant to allow profit levels to decrease. Perceived risk in the in the UK housing market had been receding with a range of developer profit of between 17% to 20% of private housing GDV being seen on developments across London, but the outcome of the referendum on the UK's membership of the European Union has resulted in a degree of uncertainty about the future trajectory of house prices, particularly in prime central London markets. Paragraph 018 of the PPG indicates that planning authorities should consider profit margins between 15% to 20% of GDV. We have therefore adopted a profit margin of 20% on private housing GDV for testing purposes (being at the higher end of the range previously experienced), although individual schemes may require lower or higher profits, depending on site specific circumstances.
- 4.36 Our assumed return on affordable housing GDV is 6%. A lower return on the affordable housing is appropriate as there is very limited sales risk on these units for the developer; there is often a pre-sale of the units to an RP prior to commencement. Any risk associated with take up of intermediate housing is borne by the acquiring RP, not by the developer. A reduced profit level on the affordable housing reflects the GLA 'Development Control Toolkit' guidance (February 2014) and the former Homes and Communities Agency's ('HCA') guidelines in its Development Appraisal Tool (August 2013). The NPPG on Viability also identifies that, *"A lower figure may be more appropriate in consideration of delivery of affordable housing in circumstances where this guarantees an end sale at a known value and reduces risk"* (Para 018).

Exceptional costs

- 4.37 Exceptional costs can be an issue for development viability on previously developed land. Exceptional costs relate to works that are 'atypical', such as remediation of sites in former industrial use and that are over and above standard build costs. However, in the absence of detailed site investigations, it is not possible to provide a reliable estimate of what exceptional costs might be, further these costs will vary on a site by site basis. Our analysis therefore excludes exceptional costs, as to apply a blanket allowance would generate misleading results. An 'average' level of costs for abnormal ground conditions and some other 'abnormal' costs is already reflected in BCIS data, as such costs are frequently encountered on sites that form the basis of the BCIS data sample.
- 4.38 It is expected however, that when purchasing previously developed sites developers will have undertaken reasonable levels of due diligence and would therefore have reflected obvious remediation costs/suitable contingencies into their purchase price.

Benchmark land values for residential analysis

- 4.39 The NPPG on Viability indicates that benchmark land values should be based on existing use value plus a premium to incentivise the release of sites for development. The NPPG states very clearly that transactional data should be treated with caution, as using historic transaction of non-policy compliant developments can inflate land values over time (Para 014). The NPPG also states that local planning authorities should not rely upon prices paid for sites for establishing benchmark land values and that hope value should be disregarded (Para 015). Furthermore, the NPPG indicates that any premium to be added to existing use value should provide an incentive to landowners to bring land forward, but critically this must be balanced with the need to provide *"a sufficient contribution to comply with policy requirements"* (Para 016).
- 4.40 Benchmark land values, based on the existing use value or alternative use value of sites are key considerations in the assessment of development economics for testing planning policies and tariffs. Clearly, there is a point where the Residual Land Value (what the landowner receives from a developer) that results from a scheme may be less than the

land's existing use value. Existing use values can vary significantly, depending on the demand for the type of building relative to other areas. Similarly, subject to planning permission, the potential development site may be capable of being used in different ways – as a hotel rather than residential for example; or at least a different mix of uses. Existing use value or alternative use value are effectively the 'bottom line' in a financial sense and therefore a key factor in this study.

- 4.41 We have arrived at a broad judgement on the likely range of benchmark land values. On previously developed sites, the calculations assume that the landowner has made a judgement that the current use does not yield an optimum use of the site; for example, it has fewer storeys than neighbouring buildings; or there is a general lack of demand for the type of space, resulting in low rentals, high yields and high vacancies (or in some cases no occupation at all over a lengthy period). We would not expect a building which makes optimum use of a site and that is attracting a reasonable rent to come forward for development, as residual value may not exceed current use value in these circumstances.
- 4.42 The four benchmark land values used in this study (see Table 4.48 below) have been selected to provide a broad indication of likely land values across the borough, but it is important to recognise that other site uses and values may exist on the ground. There can never be a single threshold land value at which we can say definitively that land will come forward for development, especially in urban areas.
- 4.43 It is also necessary to recognise that a landowner will require an additional incentive to release the site for development¹⁴. The premium above current use value would be reflective of specific site circumstances (the primary factors being the occupancy level and strength of demand from alternative occupiers). For policy testing purposes it is not possible to reflect the circumstances of each individual site, so a blanket assumption of a 20% premium has been adopted, which is towards the higher end of the scale.
- 4.44 Redevelopment proposals that generate residual land values below existing use values are unlikely to be delivered. While any such thresholds are only a guide in 'normal' development circumstances, it does not imply that individual landowners, in particular financial circumstances, will not bring sites forward at a lower return or indeed require a higher return. If proven existing use value justifies a higher benchmark than those assumed, then appropriate adjustments may be necessary. As such, existing use values should be regarded as benchmarks rather than definitive fixed variables on a site by site basis.

Benchmark land values

- 4.45 **Benchmark Land Value 1:** This benchmark assumes higher value secondary office space on a hectare of land, with 40% site coverage and 4 storeys. The rent assumed is based on lettings of second hand offices in the borough at £166.30 per square metre (£15.45 per square foot). We have assumed a £538.20 per square metre (£50 per square foot) allowance for refurbishment and a letting void of three years. The capital value of the building would be £9.181 million, to which we have added a 20% premium, resulting in a benchmark of £11.017 million.
- 4.46 **Benchmark Land Value 2:** This benchmark assumes lower value secondary office space on a hectare of land, with 40% site coverage and 4 storeys. The rent assumed is based on lettings of second hand offices in the borough at £107.64 per square metre (£10 per square foot). We have assumed a £538.20 per square foot (£50 per square foot) allowance for refurbishment and a letting void of three years. The capital value of the building would be £4.173 million, to which we have added a 20% premium, resulting in a benchmark of £5.007 million.

¹⁴ This approach is therefore consistent with the NPPG, which sets out that, "the premium should provide a reasonable incentive, in comparison with other options available, for the landowner to sell land for development while allowing a sufficient contribution to fully comply with policy requirements. Landowners and site purchasers should consider policy requirements when agreeing land transactions. This approach is often called 'existing use value plus' (EUV+) (Para 013)

- 4.47 **Benchmark Land Value 3:** This benchmark assumes secondary industrial/storage/distribution space on a hectare of land, with 60% site coverage and 1.5 storeys. The rent assumed is based on such lettings of second hand premises in the borough at £56.51 per square metre (£5.25 per square foot). We have assumed a £269.10 per square metre (£25 square foot) allowance for refurbishment and a letting void of two and a half years. The capital value of the building would be £2.823 million, to which we have added a 20% premium, resulting in a benchmark of £3.387 million.
- 4.48 **Benchmark Land Value 4:** This benchmark assumes community use on a hectare of land, with 50% site coverage and 1.5 storeys. The rent assumed is based on lettings of such space in the borough at £48.44 per square metre (£4.50 square foot). We have assumed a letting void of two and a half years. The capital value of the building would be £1.996 million, to which we have added a 20% premium, resulting in a benchmark of £2.395 million.

Table 4.48.1: Summary of Benchmark Land Values

Use	Benchmark per gross hectare
Higher Value Secondary Offices	£11,017,000
Lower Value Secondary Offices	£ 5,007,000
Secondary Industrial/Storage/Distribution	£ 3,387,000
Community Use	£ 2,395,000

Student Accommodation and Warehouse Living

- 4.49 As part of this review we have considered the viability of purpose built student accommodation in the Eastern CIL Zone and the new residential use Warehouse Living in the borough. The Eastern CIL area has in particular seen a significant quantum of student accommodation consented and developed since Haringey's CIL Charging schedule was adopted. Current student accommodation CIL charges are set at the same level as residential developments. Given the quantum of student accommodation development that has come forward in the Eastern CIL Zone, the Council has requested we undertake testing of such developments. With respect to Warehouse Living, the designated Warehouse Living district is located within the Eastern CIL Zone. This was not considered within the last Charging Schedule, however given the significant quantum of development of such space in recent years and the formalisation of this new type of residential accommodation, the Council has requested that the viability of this use is assessed as part of this review.
- 4.50 We have appraised development typologies reflecting these uses at average rent levels achieved on lettings of such space in actual developments. In each case, our assessment assumes an intensification of the site, based on three current commercial uses of the site, providing a range of current use values. In each case, the existing use value assumes that the existing building is 30%-50% of the size of the new development, with a lower rent and higher yield reflecting the secondary nature of the building.

Rents and yields

- 4.51 Table 4.53.1 summarises our assumptions on appropriate rents and yields to arrive at a capital value of the commercial space. New build developments are on the whole likely to attract a premium rent above second hand rents.
- 4.52 Our appraisals of student and warehouse living developments test the viability of developments on commercial sites. We have assumed lower rents and higher yields for existing space than the planned new floorspace. This reflects the lower quality and lower demand for second hand space, as well as the poorer covenant strength of the likely occupier of second hand space. A modest refurbishment cost is allowed for to reflect costs that would be incurred to secure a letting of the existing space. A 20% landowner premium is added to the resulting existing use value as an incentive for the site to come forward for

development. The actual premium would vary between sites, and be determined by site-specific circumstances, so the 20% premium has been adopted as a 'top of range' scenario for testing purposes.

Build costs

- 4.53 We have sourced build costs from the BCIS, which is based on tenders for actual schemes. These costs vary between different uses and exclude external works and fees (our appraisals include separate allowances for these costs). Costs for each type of development are shown in Table 4.53.1.
- 4.54 It is noted that the Council's Policy SP4 'Working towards a low carbon Haringey' in the SP DPD sets out the Council's aspiration to achieve at least BREEAM 'very good' with an aim to achieve 'Excellent' on all non-residential development. In this regard we have included an allowance of 2% of base build costs towards achieving BREEAM 'very good' in our commercial appraisals, which reflects the advice contained in the BREEAM and Sweett Group Research 'Delivering Sustainable Buildings: savings and payback' 2014.

Profit

- 4.55 In common with residential schemes, commercial schemes need to show a risk adjusted profit to secure funding. Profit levels are typically around 20% of developments costs and we have incorporated this assumption into our appraisals.

Residual Section 106 costs

- 4.56 The extent to which the Council will seek Section 106 contributions on commercial floorspace is unclear at this stage, but we have incorporated a notional £20 per square metre allowance. This figure is considered to be a reasonable proxy for likely sums to be sought after CIL is adopted. It is noted that Section 106 contributions will remain negotiable and in this regard there is scope for these to flex according to viability.

Table 4.53.1: Student Accommodation and Warehouse Living appraisal assumptions

Appraisal input	Source/Commentary	Student Accommodation	Warehouse Living
Total floor area sq m (sq ft)	Scheme	500 rooms 13 239 sq m (142,500 sq ft) based on 26.48 sq m (285 sq ft) per room	(4 flats with 16 rooms in total) 1,060 sq m (11,408 sq ft)
Rent	Based on average lettings sourced from EGI and Focus	£179 per week for standard room £155 per week for affordable room £250 per week for a studio Blended rate adopted of £173 per week (60% market rent, 40% affordable rooms)	£700 per room per calendar month.
Rent free/void period (years)	BNPPRE assumption	95% occupancy of rooms	95% occupancy of rooms
Yield	BNPPRE prime yield schedule	4.75%	4.75%
Purchaser's costs (% of GDV)	Stamp duty 4%, plus agent's and legal fees	6.80%	6.8%
Demolition costs £s per sq m (£s per sq ft) of existing space	Based on experience from individual schemes	(£8)	N/A

Appraisal input	Source/Commentary	Student Accommodation	Warehouse Living
Gross to net (net as % of gross)	Based on experience from individual schemes	N/A as rent based on per room and room size based on gross area per room.	N/A as rent based on per room and size of warehouse based on gross area.
Base construction costs per sq m (£s per sq ft)	BCIS costs. Student Accommodation – ‘generally’ mean and Rehabilitation / conversion Flats ‘Generally’ mean	£2,038 per sq m (£189.33 per sq ft)	£1,061 per sq m (£98.57 per sq ft)
BREEAM Very Good (% of base build costs)		2%	N/A
External works (% of base build costs)	BNPPRE assumption	10%	0%
Contingency (% of build costs)	BNPPRE assumption	5%	5%
Letting agent's fee	(% of first year's rent)	N/A	N/A
Agent's fees and legal fees	(% of capital value)	1.5%	1.75%
Interest rate	BNPPRE assumption	7%	7%
Professional fees (% of build)	BNPPRE assumption, relates to complexity of scheme	10%	8%
Profit (% of costs)	BNPPRE assumption based on schemes submitted for planning	20%	20%

Table 4.53.2 Student Accommodation and Warehouse Living appraisal assumptions – current use benchmarks

Appraisal input	Source/Commentary	Student Accommodation	Warehouse Living
Existing floorspace	Assumed to be between 30% to 50% of new space (N.B. appraisals do not discount existing floorspace)	50%	100%
Rent on existing floorspace £ per sq m (£s per sq ft)	Reflects three types of poor quality second hand space (industrial, office and retail as appropriate), low optimisation of site etc. and ripe for redevelopment.	£129.17 per sq m (£12 per sq ft)	£43.06 per sq m (£4 per sq ft)
Yield on existing floorspace	BNPPRE assumption, reflecting lower covenant strength of potential tenants, poor quality building etc.	7%	8%
Rent free on existing space	Years	2	3
Refurbishment costs £ per sq m (£s per sq ft)	General allowance for bringing existing space up to lettable standard	£322.92 per sq m (£30 per sq ft)	£269.10 per sq m (£25 per sq ft)
Fees on refurbishment (% of refurb cost)	BNPPRE assumption	7%	7%
Landowner premium	BNPPRE assumption – in reality the premium is likely to be lower, therefore this is a conservative assumption	20%	20%

5 Appraisal outputs

- 5.1 The full outputs from our appraisals of the various developments tested are set out in Section 6 and appendices 1 to 9. We have modelled eight development typologies, reflecting different densities and types of development in the borough. These have been tested against the typical land value benchmarks for the borough.

Residential appraisals scenarios tested

- 5.2 The purpose of the exercise is to test whether the rate of CIL can be varied from the current rates in the adopted Charging Schedule. We have therefore tested the eight development typologies with 40% to 10% affordable housing to reflect the range of affordable housing delivered on actual developments across the borough. The affordable housing has also been tested with a range of affordable housing tenures with 60% provided as affordable rented accommodation and 40% intermediate accommodation with the exception of the Tottenham AAP area where the tenure split is 40% affordable rented accommodation and 60% intermediate accommodation. We set out below the scenarios tested:
- 1 Policy position with base sales values and base costs (including extra overs for planning policy requirements);
 - 40% affordable housing (60% rented 40% intermediate) with the following tenures tested:
 - Rented as AR @LHA and intermediate as SO;
 - Rented as LAR and intermediate as SO;
 - Rented as SR and intermediate as SO; and
 - Rented as SR and intermediate as DMR at LLR.
 - 40% affordable housing (40% rented 60% intermediate) in Tottenham AAP area with the following tenures tested:
 - Rented as AR @LHA and intermediate as SO;
 - Rented as LAR and intermediate as SO;
 - Rented as SR and intermediate as SO; and
 - Rented as SR and intermediate as DMR at LLR.
 - 0% affordable housing for typologies 1 which falls below the threshold.
 - 2 As (1) above with 30%, 20%, 10% and 0% affordable housing;
 - 3 As (1) above with 10% increase in sales values and 5% increase in build costs; and
 - 4 As (1) above with 5% fall in sales values.
- 5.3 CIL applies to net additional floor area only. Our base appraisals assume no deduction for existing floorspace, thereby providing the worst case scenario¹⁵.
- 5.4 The residual land values from each of the scenarios above are then compared to the benchmark land value based on the assumptions set out in paragraphs 4.45 to 4.48. This comparison enables us to determine whether the imposition of higher rates of CIL than those in the adopted Charging Schedule (with indexation) would have a significant impact on development viability. In some cases, the equation RLV less BLV results in a negative number, so the development would not proceed, whether the adopted level of CIL was imposed or not. Given that the rates would apply to such scenarios currently, as the CIL is in force, the question we need to explore is the extent to which a higher rate of CIL would significantly change the result, such that the scheme would almost certainly not come forward.

¹⁵ Existing buildings must be occupied for their lawful use for at least six months in the three years prior to grant of planning permission to qualify as existing floorspace for the purposes of calculating CIL liability.

- 5.5 The results for each site type are presented in tables showing the CIL rate and the corresponding RLV (which is then converted into a RLV per hectare). The RLV per hectare is then compared to the four benchmark land values, which are also expressed as a per hectare value. Where the RLV exceeds the benchmark, the amount of CIL entered into the appraisal is considered viable.
- 5.6 A sample of the format of the results is provided in Figure 5.6.1 below. This sample relates to site type 3.

Figure 5.6.1: Sample format of residential results

Community Infrastructure Levy
LB Haringey

Benchmark Land Values (per gross ha)

BLV1	BLV2	BLV3	BLV4
Higher Value Secondary offices	Low er Value Secondary offices	Secondary Industrial/Storage/ Distribution	Community Use
£11,017,000	£5,007,000	£3,387,000	£2,395,000

Site type 3

	Flats
No of units	11 units
Density:	140 dph
Sustainability:	1

Affordable %	40%
% Social rent	60%
% Shared owner	40%

Site area	0.08 ha
Net to gross	100%

Growth	
Sales	0%
Build	0%

Eastern CIL Zone

Private values £6728 psm

CIL amount per sq m	RLV	RLV per ha	RLV less BLV 1	RLV less BLV 2	RLV less BLV 3	RLV less BLV 4
0	390,775	4,973,497	-6,043,503	-33,503	1,586,497	2,578,497
65	349,900	4,453,271	-6,563,729	-553,729	1,066,271	2,058,271
85	339,391	4,319,525	-6,697,475	-687,475	932,525	1,924,525
105	328,882	4,185,767	-6,831,233	-821,233	798,767	1,790,767
125	318,373	4,052,021	-6,964,979	-954,979	665,021	1,657,021
145	307,865	3,918,276	-7,098,724	-1,088,724	531,276	1,523,276
165	297,356	3,784,530	-7,232,470	-1,222,470	397,530	1,389,530
185	286,846	3,650,772	-7,366,228	-1,356,228	263,772	1,255,772
205	276,338	3,517,027	-7,499,973	-1,489,973	130,027	1,122,027
225	265,829	3,383,281	-7,633,719	-1,623,719	-3,719	988,281
275	239,557	3,048,911	-7,968,089	-1,958,089	-338,089	653,911
300	226,421	2,881,719	-8,135,281	-2,125,281	-505,281	486,719
325	213,284	2,714,528	-8,302,472	-2,292,472	-672,472	319,528
350	200,149	2,547,349	-8,469,651	-2,459,651	-839,651	152,349
400	173,877	2,212,979	-8,804,021	-2,794,021	-1,174,021	-182,021
435	155,487	1,978,921	-9,038,079	-3,028,079	-1,408,079	-416,079

6 Assessment of the results

- 6.1 This section sets out the results of our appraisals. This section should be read in conjunction with the full results attached at **Appendices 1 to 6** (residential appraisal results), **Appendix 7** (PRS appraisal results), **Appendix 8** (student accommodation appraisals) and **Appendix 9** (Warehouse living appraisals). In these results, the residual land values are calculated for scenarios with sales values and capital values reflective of market conditions across the borough. These residual land values are then compared to appropriate benchmark land values. The maximum CIL rates for each scheme and scenario are determined by deducting the benchmark land values from the residual land value and dividing any surplus by the number of square metres that would – in principle – be liable to pay CIL. On residential schemes for example, this means that the maximum CIL rates are determined by reference to the private floor area only, with affordable housing floorspace excluded from the calculation. This provides a significant number of results, depending on other factors tested, most notably the level of affordable housing.
- 6.2 The CIL regulations state that in setting a charge, local authorities *must 'strike an appropriate balance'* between securing sufficient revenue to fund necessary infrastructure on the one hand and the potentially adverse impact of CIL upon the viability of development across the whole area on the other. Our recommendations are that:
- Firstly, councils should take a strategic view of viability. There will always be variations in viability between individual sites, but viability testing should establish the most typical viability position; not the exceptional situations.
 - Secondly, councils should take a balanced view of viability – residual valuations are just one factor influencing a developer's decision making – the same applies to local authorities.
 - Thirdly, while a single charge is attractive, it may not be appropriate for all authorities, particularly in areas where sales values vary between areas.
 - Fourthly, markets are cyclical and subject to change over short periods of time. Sensitivity testing to sensitivity test levels of CIL to ensure they are robust in the event that market conditions improve over the life of a Charging Schedule is essential.
 - Fifthly, local authorities should not set their rates of CIL at the limits of viability. They should leave a margin or contingency to allow for change and site specific viability issues.
- 6.3 CIL rates should not necessarily be determined solely by viability evidence, but should not be logically contrary to the evidence. Councils should not follow a mechanistic process when setting rates – appraisals are just a guide to viability and are widely understood to be a less than precise tool.
- 6.4 This conclusion follows guidance in paragraph: Para 020 Ref ID: 25-020-20190901 of the NPPG on CIL, which states that *'there is no requirement for a proposed rate to exactly mirror the evidence... There is room for some pragmatism'*. Further, Para: 022 Ref ID: 25-022-20190901 of the NPPG identifies that, *'a charging authority that plans to set differential levy rates should seek to avoid undue complexity'*.

Residential development

- 6.5 As CIL is intended to operate as a fixed charge, the Council will need to consider the impact of any increase in the Eastern Charging Zone CIL rate on two key factors. Firstly, the need to strike a balance between securing enough revenue to invest in infrastructure on the one hand and the need to *minimise* the impact upon development viability on the other. Secondly, as CIL will effectively take a 'top-slice' of development value, there is a potential impact on the percentage or tenure mix of affordable housing that can be secured. This is a change from the historic system of negotiated financial contributions, where the planning authority can weigh the need for contributions against the requirement that schemes need to contribute towards affordable housing provision.
- 6.6 In assessing the results, it is important to clearly distinguish between two scenarios; namely, schemes that are unviable *regardless* of the level of CIL (including a nil rate) and schemes that are viable *prior* to the imposition of CIL at certain levels. If a scheme is unviable before CIL is levied, it is unlikely to come forward and CIL would not be a critical factor. We have therefore disregarded the 'unviable' schemes in recommending an appropriate level of CIL. The unviable schemes will only become viable following a degree of real house price inflation, or in the event that the Council agrees to a lower level of affordable housing for particular sites in the short term.
- 6.7 The critical issue to consider, therefore, is the extent to which an increase in CIL rates in the Eastern Charging Zone would move a development typology from showing as viable to being either only marginally viable or unviable. If there are many instances where this shift occurs, then the Council should avoid increasing CIL rates to avoid adversely impacting on housing and commercial land supply. If on the other hand, the impact is relatively modest, then the Council could confidently increase the CIL rates in the knowledge that land supply is unlikely to be affected.

The potential impact of increased CIL rates on development viability

- 6.8 As noted in paragraph 6.6, where a scheme is unviable the imposition of CIL at a zero level will not make the scheme viable. Other factors (i.e. sales values, build costs or benchmark land values) would need to change to make the scheme viable. For the purposes of establishing whether the currently adopted CIL rates can be revised upwards, we have undertaken an exercise which compares (a) residual values for each development typology reflecting the prevailing CIL rates to (b) residual values of each typology with a series of increased CIL rates.
- 6.9 There is clearly a balance that has to be struck between the aims of the Council's affordable housing policy and recent changes to the preferred tenure aspirations for affordable housing sought from schemes coming forward in the borough. Policy SP2 (Housing), Policy DM13 (Affordable Housing) and Policy AAP3 (Housing) set out the Council's policy position on the delivery of affordable housing (which sets a target of 40%, subject to individual scheme viability) and securing adequate contributions towards infrastructure from the developments that contribute towards the need for new infrastructure. The CIL rate cannot therefore be set on the basis that every single development typology right across the borough will deliver 40% affordable housing, as this is not always viable.
- 6.10 All the results for the Eastern Charging Zone summarised in tables 6.10.1 and 6.10.2 below assume that current affordable housing target of 40% is met in full and considers the impact of different affordable tenures and tenure splits. Notwithstanding this, we note that Site Type 1 is a scheme which falls below the affordable housing threshold, and the results below are based on 0% affordable housing.
- 6.11 We have however considered the full range of results of testing where we have included between 10% and 40% affordable housing, as the Council will need to secure adequate amounts of funding to support new development. Affordable housing cannot be maximised to the total exclusion of securing infrastructure funding and vice versa.

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- 6.12 The appraisals generate a very wide spread of potential CIL rates, depending on the benchmark land value, residential sales values and the affordable housing tenure mix within each development typology. As one would expect, the capacity for schemes to absorb CIL is greater where the benchmark land value is lowest. Furthermore, it is clear that the capacity to absorb CIL contributions declines as the percentage of affordable housing increases and more affordable tenures of affordable housing are included.
- 6.13 Table 6.10.1 sets out a summary of the Maximum CIL charges at 40% affordable housing indicated by our appraisals inclusive of Mayoral CIL. Table 6.10.2 sets out a summary of the Maximum Borough CIL charges at 40% affordable housing indicated by our appraisals i.e. they exclude Mayoral CIL.

Table 6.10.1: Summary of Maximum CIL Results (inclusive of Mayoral CIL) at 40% affordable housing (£ per square metre)

	Benchmark land value 1 - Higher Value Secondary Offices								Benchmark land value 2- Lower Value Secondary Offices							
<i>Tenure tested</i>	<i>AR & SO</i>		<i>LAR & SO</i>		<i>SR &SO</i>		<i>SR & DMR @ LLR</i>		<i>AR & SO</i>		<i>LAR & SO</i>		<i>SR &SO</i>		<i>SR & DMR @ LLR</i>	
<i>Affordable hsg %</i>	40%	40%	40%	40%	40%	40%	40%	40%	40%	40%	40%	40%	40%	40%	40%	40%
<i>Tenure split</i>	60 : 40	40 : 60	60 : 40	40 : 60	60 : 40	40 : 60	60 : 40	40 : 60	60 : 40	40 : 60	60 : 40	40 : 60	60 : 40	40 : 60	60 : 40	40 : 60
T1 - 5 Houses (NB - 0% AH)	435	435	435	435	435	435	435	435	435	435	435	435	435	435	NV	NV
T2 - 10 Flats	NV	NV	NV	NV	NV	NV	NV	NV	435	435	435	435	NV	300	NV	NV
T3 - 11 Flats	NV	NV	NV	NV	NV	NV	NV	NV	435	435	435	435	NV	325	NV	NV
T4 - 25 Flats	NV	NV	NV	NV	NV	NV	NV	NV	85	185	0	145	NV	NV	NV	NV
T5 - 50 Flats	NV	NV	NV	NV	NV	NV	NV	NV	165	275	105	225	NV	NV	NV	NV
T6 - 100 Flats	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV
T7 - 250 Flats	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV
T8 - 500 Flats	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV

	Benchmark land value 3 - Secondary Industrial/Storage/Distribution								Benchmark land value 4- Community Use							
<i>Tenure tested</i>	<i>AR & SO</i>		<i>LAR & SO</i>		<i>SR &SO</i>		<i>SR & DMR @ LLR</i>		<i>AR & SO</i>		<i>LAR & SO</i>		<i>SR &SO</i>		<i>SR & DMR @ LLR</i>	
<i>Affordable hsg %</i>	40%	40%	40%	40%	40%	40%	40%	40%	40%	40%	40%	40%	40%	40%	40%	40%
<i>Tenure split</i>	60 : 40	40 : 60	60 : 40	40 : 60	60 : 40	40 : 60	60 : 40	40 : 60	60 : 40	40 : 60	60 : 40	40 : 60	60 : 40	40 : 60	60 : 40	40 : 60
T1 - 5 Houses (NB - 0% AH)	435	435	435	435	435	435	435	435	435	435	435	435	435	435	435	435
T2 - 10 Flats	435	435	435	435	185	435	NV	NV	435	435	435	435	350	435	NV	NV
T3 - 11 Flats	435	435	435	435	205	435	NV	NV	435	435	435	435	350	435	NV	NV
T4 - 25 Flats	300	400	225	350	NV	NV	NV	NV	435	435	400	435	NV	125	NV	NV
T5 - 50 Flats	350	435	300	435	NV	0	NV	NV	435	435	435	435	NV	165	NV	NV
T6 - 100 Flats	NV	0	NV	NV	NV	NV	NV	NV	NV	85	NV	0	NV	NV	NV	NV
T7 - 250 Flats	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV
T8 - 500 Flats	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV

Table 6.10.2: Summary of Maximum Borough CIL Results (exclusive of Mayoral CIL) at 40% affordable housing (£ per square metre)

	Benchmark land value 1 - Higher Value Secondary Offices								Benchmark land value 2- Lower Value Secondary Offices							
<i>Tenure tested</i>	<i>AR & SO</i>		<i>LAR & SO</i>		<i>SR & SO</i>		<i>SR & DMR @ LLR</i>		<i>AR & SO</i>		<i>LAR & SO</i>		<i>SR & SO</i>		<i>SR & DMR @ LLR</i>	
<i>Affordable hsg %</i>	40%	40%	40%	40%	40%	40%	40%	40%	40%	40%	40%	40%	40%	40%	40%	40%
<i>Tenure split</i>	60 : 40	40 : 60	60 : 40	40 : 60	60 : 40	40 : 60	60 : 40	40 : 60	60 : 40	40 : 60	60 : 40	40 : 60	60 : 40	40 : 60	60 : 40	40 : 60
T1 - 5 Houses (NB - 0% AH)	375	375	375	375	375	375	375	375	375	375	375	375	375	375	NV	NV
T2 - 10 Flats	NV	NV	NV	NV	NV	NV	NV	NV	375	375	375	375	NV	240	NV	NV
T3 - 11 Flats	NV	NV	NV	NV	NV	NV	NV	NV	375	375	375	375	NV	265	NV	NV
T4 - 25 Flats	NV	NV	NV	NV	NV	NV	NV	NV	25	125	NV	85	NV	NV	NV	NV
T5 - 50 Flats	NV	NV	NV	NV	NV	NV	NV	NV	105	215	45	165	NV	NV	NV	NV
T6 - 100 Flats	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV
T7 - 250 Flats	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV
T8 - 500 Flats	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV

	Benchmark land value 3 - Secondary Industrial/Storage/Distribution								Benchmark land value 4- Community Use							
<i>Tenure tested</i>	<i>AR & SO</i>		<i>LAR & SO</i>		<i>SR & SO</i>		<i>SR & DMR @ LLR</i>		<i>AR & SO</i>		<i>LAR & SO</i>		<i>SR & SO</i>		<i>SR & DMR @ LLR</i>	
<i>Affordable hsg %</i>	40%	40%	40%	40%	40%	40%	40%	40%	40%	40%	40%	40%	40%	40%	40%	40%
<i>Tenure split</i>	60 : 40	40 : 60	60 : 40	40 : 60	60 : 40	40 : 60	60 : 40	40 : 60	60 : 40	40 : 60	60 : 40	40 : 60	60 : 40	40 : 60	60 : 40	40 : 60
T1 - 5 Houses (NB - 0% AH)	375	375	375	375	375	375	375	375	375	375	375	375	375	375	375	375
T2 - 10 Flats	375	375	375	375	125	375	NV	NV	375	375	375	375	290	375	NV	NV
T3 - 11 Flats	375	375	375	375	145	375	NV	NV	375	375	375	375	290	375	NV	NV
T4 - 25 Flats	240	340	165	290	NV	NV	NV	NV	375	375	340	375	NV	65	NV	NV
T5 - 50 Flats	290	375	240	375	NV	NV	NV	NV	375	375	375	375	NV	105	NV	NV
T6 - 100 Flats	NV	NV	NV	NV	NV	NV	NV	NV	NV	25	NV	NV	NV	NV	NV	NV
T7 - 250 Flats	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV
T8 - 500 Flats	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV	NV

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- 6.14 Site types 2 and 3 are small scale flatted developments from which the Council would seek affordable housing. The results of our appraisals identify that dependant on the affordable housing tenure and split and benchmark land value, these schemes could support a maximum Borough CIL charge of between £65 per square metre and £375 per square metre at 40% affordable housing.
- 6.15 Site types 4 and 5 are medium density flatted developments of 25 and 50 units respectively. Such schemes incur higher build costs than the previous typologies and as a result this has an impact on the residual land values. As with site types 2 and 3 the results of our appraisals identify that dependant on the affordable housing tenure and split and benchmark land value, these schemes could support a CIL charge. The maximum viable borough CIL charge is identified as being between £25 per square metre and £375 per square metre at 40% affordable housing.
- 6.16 Site Types 6, 7 and 8 reflect high density flatted schemes. These schemes incur higher build costs than the previous schemes and understandably this can be seen to impact on viability. They are unviable in all except one instance at 40% affordable housing. Consequently, the imposition of a CIL charge cannot be considered to detrimentally impact on the viability or deliverability of such schemes in these locations.
- 6.17 When considering the results set out in tables 6.10.1 and 6.10.2, in conjunction with the sensitivity testing scenarios of lower levels of affordable housing, which reflects the range of affordable housing delivered on actual developments across the borough, it is noted that viability across the typology schemes is achievable. At lower affordable housing levels the maximum viable borough CIL charge dependant on the affordable housing tenure and split and benchmark land value is identified as being between £25 per square metre and £375 per square metre.
- 6.18 The results of our appraisals identify that at 40% affordable housing delivered as SR and DMR at LLR tenures viability is challenging. However our appraisals at lower levels of affordable housing do demonstrate some viability to accommodate a CIL charge. As identified above, the imposition of CIL at a zero level on such schemes will not make the scheme viable, rather other factors (i.e. sales values, build costs or benchmark land values) would need to change to make the scheme viable.
- 6.19 In the Eastern CIL Zone the flexibility of the Council's affordable housing policy will ensure that developments come forward. This would enable the Council to seek contributions towards infrastructure delivery as well as reasonable levels of affordable housing.

Sensitivity growth in sales values and increases in build costs

- 6.20 As noted in Section 5, we carried out further analyses which consider the impact of increases in sales values of 10%, accompanied by an increase in build costs of 5%. This data is illustrative only, as the future housing market trajectory is uncertain. However, if such increases were to occur, the tables contained within Appendix 5 set out the results of consequential impacts on how increased levels of CIL might be absorbed by developments. It is also worth noting that given the predicted improvement in the market in the medium term, there may be potential for developer's return/profits to reduce in future to the levels that were starting to be seen prior to the result of the EU Referendum vote. This would further improve viability, as would the ability for S106 developments to secure grant funding for affordable housing.

Suggested CIL rates

- 6.21 Although the results indicate that viability of residential development is currently challenging on certain types of development, it is possible for the Council to continue to levy rates across the Eastern CIL Zone and increase the rates, subject to allowing for a buffer or margin to address risks to delivery.
- 6.22 As previously identified we reiterate that it is important to consider that where a scheme is shown as unviable before the application of CIL, it will be movements in other key appraisal variables such as sales values and build costs that enable a scheme to become viable.
- 6.23 In arriving at a conclusion on recommended rates, it is necessary to consider the different weight that should be attached to appraisal results tested against each of the four benchmark land values. Where the appraisals indicate that the residual values generated by residential schemes are unlikely to outperform specific benchmark land values these buildings are more likely to remain in their existing use, rather than be redeveloped.
- 6.24 In determining the maximum levels of CIL and the recommended rates, we have based our assessment on current costs and values only. We have run a set of appraisals that show the impact of an increase in sales values, accompanied by an increase in build costs and a further set of results that show the impact of a fall in sales values (the results are set out at **appendices 5 and 6**). These appraisals provide an indication of the likely movement in viability that any 'buffer' below the maximum rates would need to accommodate.
- 6.25 The maximum rates of CIL indicated by our appraisals are outlined below. Given the range of results above, and the risk factors outlined in the previous paragraph, our conclusion is that the rates of CIL that the Council might set – having regard to the range of the results and taking account of viability across the borough as a whole are as shown in Table 6.25.1 below.

Table 6.25.1: Maximum and suggested Residential CIL rates based on evidence

Tenure Tested	Maximum CIL Analysis £ per sq m (inclusive of Mayoral CIL)	Maximum Borough CIL £ per sq m	Proposed CIL Charges allowing for buffer
AR & SO	£205	£145	£115
LAR & SO	£205	£145	£115
SR & SO	£145	£85	£65
SR & DMR @ LLR	£125	£65	£50

- 6.26 In light of the above we recommend that the Council considers increasing the Eastern CIL Zone CIL charge to £50 per square metre. When considered in context of total scheme value, the recommended CIL rate will be a very modest amount, typically accounting for between 1% and 1.6% of development costs. This level of charge is considered to be nominal and is unlikely to have an impact on a developer's decision making as to whether to bring forward a scheme or not.

PRS schemes

- 6.27 PRS schemes are currently charged under the adopted Residential CIL charge, which is £15 per (£18.63 per square metre after indexation) in the Eastern CIL Zone. The results of our appraisals of residential developments in the Eastern CIL Zone provided as PRS (see

Appendix 4) identify that such schemes can viably support a higher CIL charge to contribute towards infrastructure. In light of this, we recommend that the Council considers setting a rate for such developments in the East of the Borough of £100 per square metre. This is based on a maximum CIL charge of £185 per square metre. After allowing for Mayoral CIL2 this leaves a maximum borough charge of £125 per square metre, to which we have applied a buffer of 20%.

- 6.28 A CIL charge of £100 per square metre reflects a charge of no more than circa 4% of development costs, which in our experience is unlikely to be the determining factor in a developer's decision making as to whether they deliver such developments.

Student accommodation

- 6.29 The following section sets out the results of our analysis of the viability of student accommodation development in the Eastern CIL Zone. As previously identified the pre-existing rates of CIL in the adopted Charging Schedule for Student accommodation mirrors the residential rates adopted. The adopted charge in the Eastern CIL Zone is £15 per (£18.63 per square metre after indexation). Student schemes which can demonstrate an agreement between the provider and a recognised higher education institution are not required to provide affordable student housing, which has an impact on viability of developments.
- 6.30 Our testing considers whether there have been significant changes in viability that would give rise to an enhanced capacity to absorb a higher CIL rate than currently levied.
- 6.31 Student rents have continued to increase since the Charging Schedule was adopted and consequently scheme values have grown faster than build costs and residual land values have increased.
- 6.32 Our appraisal of student housing developments is attached at **Appendix 5**. Our analysis of a scheme entirely at private market rents (£185 per week on 51 week tenancies, which is the lower end of the range), indicates a maximum viable CIL rate of £435 per square metre. The currently adopted CIL rates are therefore identified as being significantly below the maximum CIL rate for such schemes. However, when an allowance of 40% affordable student accommodation is allowed for within the appraisal the CIL maximum charge reduces to £105 per square metre. Given this position and the quantum of Student Accommodation that has come forward in the Eastern CIL Zone of the borough, we recommend that the Council considers increasing its currently adopted Student Accommodation CIL charge in the Eastern CIL Zone of the borough to £85 per square metre. This would allow for a buffer of circa 20% from the maximum CIL charge of £160 per square metre and would also allow the Council to seek the maximum level of affordable student accommodation from schemes. .
- 6.33 A CIL charge of £100 per square metre would amount to circa 2.25% of development costs, which we consider would not have a significant baring on a developer's decision to bring forward a scheme.

Warehouse living

- 6.34 The current Charging Schedule does not include a rate for such uses. The identified employment areas already contain varying elements of warehouse living. The Council's Policy DM39 (Warehouse Living) "*seeks to further regularise/legitimise this use, and through the planning process, ensure existing and future occupants are provided with an appropriate standard of living; the existing creative industries and SME sectors are supported and given room to grow; and the creative living and working offer of these sites is maximised*".
- 6.35 Given the above the Council has expressed an interest in understanding the viability characteristics of such uses with respect to whether they would be able to support a CIL charge.
- 6.36 Our appraisal of the conversion of such space is attached at **Appendix 9**. This has identified that such schemes generate significant residual land values that exceed the existing use values and can accommodate a maximum CIL Charge of £683 per square metre. We recommend that the Council considers maintaining the rate of £130 per square metre (as set out in the PDCS) for such uses, which will come forward within the designated

Warehouse Living areas located in the Eastern CIL Zone. This would reflect a significant discount/buffer from the maximum charge which would account for site and scheme specific differences in such developments.

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- 6.37 Notwithstanding the above, we would query with the Council as to whether many of such conversion schemes will be liable for CIL contributions given that they will be conversions of existing floorspace and we are aware that a large number of such schemes have achieved their legal status as a result of Certificates of Lawful use development as opposed to change of use planning applications.
- 6.38 A charge of £130 per square metre would equate to circa 5.5% of the likely conversion costs or 0.5% of the total development value. Although the costs by reference to the conversion costs are a higher percentage, the latter calculation, based on comparison to the development's value, demonstrates that the CIL cost is small by reference to the revenue achievable as compared to the development costs, which are lower due to there being refurbishment costs and not new full development costs. In our experience, this level of CIL charge is unlikely to have an impact on a developer's decision to deliver such schemes.

7 Conclusions and recommendations

- 7.1 The NPPF states that *“Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure). Such policies should not undermine the deliverability of the plan”* (Para 34). The Council adopted its CIL Charging Schedule in July 2014 and it came into effect on 1 November 2014. The CIL rates are consequently embedded into both the planning requirements and the land market.
- 7.2 The residential and student accommodation rates in the Eastern CIL Zone however, are now low as a result of significant changes in market conditions in the borough since the evidence base for the first Charging Schedule was prepared. At the same time, the Council is facing significant challenges in the delivery of community infrastructure to support new development. Consequently, there is a compelling case to review the residential and student accommodation CIL rates in the Eastern CIL Zone to enhance income to support infrastructure delivery.
- 7.3 In addition, since the Charging Schedule was adopted in 2014, new formats of residential accommodation are being delivered in the borough including Warehouse Living, for which there is no current dedicated CIL charge.
- 7.4 This report and supporting appendices accordingly review the residential and student accommodation charges in the Eastern CIL Zone and considers the potential for a CIL charge on Warehouse Living schemes in the borough. The Study takes account of the cumulative impact of Haringey's current planning requirements, in line with the requirements of the NPPF, NPPG and the Local Housing Delivery Group guidance ‘Viability Testing Local Plans: Advice for planning practitioners’. In addition, we have reflected the impact of the Mayoral CIL2.
- 7.5 In considering the outputs of the appraisals, it is important to recognise that some developments will be unviable *regardless* of the Council's requirements. In these cases, the value of the existing building or the base costs (excluding policy requirements) will be higher than a redevelopment opportunity over the medium term. However, this situation should not be taken as an indication of the viability (or otherwise) of the Council's policies and requirements. In these situations, there will be little pressure from owners to redevelop for residential use and they might re-consider the situation when values change over time.

Suggested revisions to CIL Charging Schedule

- 7.6 Table 7.6.1 below summarises our recommended revisions to Haringey's CIL Charging Schedule in light of the results of our appraisals. The proposed rates are shown in bold whilst the adopted Charging Schedule rates are shown below with the corresponding 2019 indexed figures (in line with the requirements of CIL Regulation 40 (as amended)) shown in italics.

Table 7.6.1: Potential revisions to CIL Charging Schedule – Eastern CIL Zone

Use	Adopted CIL rate £s per sqm	Adopted CIL rate after indexation £s per sqm	Proposed CIL rate £s per sqm
Residential	£15	£18.63	£50
PRS	£15	£18.63	£100
Student Accommodation	£15	£18.63	£85
Warehouse Living	N/A	N/A	£130

- 7.7 We have tested residential schemes in the Eastern CIL Zone with a range of affordable housing tenures and percentages. In arriving at the updated recommended rate we have taken into consideration a balance of both the Council's current affordable housing policies target requirement for 40% as well as the Council's aspirations to deliver more affordable housing tenures in the borough. We recommend that the Council considers setting an increased CIL rate of £50 per square metre for residential development in the Eastern CIL Zone.
- 7.8 The recommended rate is set at a discount to the maximum rates identified, in line with the requirements set out in the NPPG. Consequently, there is sufficient flexibility for schemes to be able to withstand the impact of economic cycles over the life of the Charging Schedule. That said, current mainstream forecasts are that residential values will increase over the next five years.
- 7.9 We have also considered the viability of residential schemes delivered as PRS in the Eastern CIL Zone. We have allowed for affordable housing delivered at the Council's required target of 40% at LLRs. Our testing identifies that these schemes could viably support a CIL charge and we recommend that the Council considers adopting a charge of £100 per square metre in the Eastern CIL Zone
- 7.10 Our testing of student accommodation in the Eastern CIL Zone identifies that these schemes can viably support a higher CIL charge than that currently levied. Taking into consideration the requirement for the delivery of affordable student accommodation in such schemes, we have recommended an increased CIL rate of £85 per square metre.
- 7.11 The results of our appraisals of Warehouse Living schemes in the Eastern CIL Zone show that these schemes generate positive outcomes and can viably contribute towards the delivery of supporting infrastructure in the borough. We recommend a rate of £130 per square metre in the Eastern CIL Zone.
- 7.12 Our testing indicates that the proposed CIL rates will have a relatively modest impact on residual land values in most cases. Where it is not possible to pass the cost of increased CIL rates back to the landowner through a reduction in land value (for example, due to high existing use values), the increase will have a modest impact on affordable housing levels that can be delivered.
- 7.13 There is clearly a need to balance the need to deliver affordable housing with the need to

secure contributions to fund community infrastructure that will support development and growth. The Council cannot seek to prioritise securing affordable housing to the exclusion of securing funding for infrastructure and vice versa. In our view, the proposed rates strike this balance appropriately.

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- 7.14 The Council needs to strike a balance between achieving its aim of meeting needs for affordable housing with raising funds for infrastructure, and ensuring that developments generate acceptable returns to willing landowners and willing developers. This study demonstrates that the Council's flexible approach to applying its affordable housing requirements ensures that these objectives can be balanced appropriately.

Additional observations

- 7.15 Viability measured in present value terms is only one of several factors that determine whether a site is developed. Developers need to maintain a throughput of sites to ensure their staff are utilised and they can continue to generate returns for their shareholders. Consequently, small adjustments to residual land values resulting from the introduction of CIL can be absorbed in almost all circumstances by developers taking a commercial view on the impact. However, in most cases the impact on land value is sufficiently modest that this can be passed onto the land owner at the bid stage without adversely impacting on the supply of land for development.
- 7.16 In most cases, the changes in residual land values required to accommodate the increased CIL rates are very modest and the CIL itself accounts for a very small proportion of overall development costs (typically well below 5%). The imposition of CIL is therefore not the critical factor in determining whether or not a scheme will come forward.
- 7.17 In considering the outputs of the appraisals, it is important to recognise that some developments will be unviable regardless of the Council's requirements. In these cases, the value of the existing building will be higher than a redevelopment opportunity over the medium term. However, this situation should not be taken as an indication of the viability (or otherwise) of the Council's policies and requirements.
- 7.18 It is critical that developers do not over-pay for sites such that the value generated by developments is paid to the landowner, rather than being used to provide affordable housing. The Council should work closely with developers to ensure that landowners' expectations of land value are appropriately framed by the local policy context and adjusted for the proposed CIL rates. There may be instances when viability issues emerge on individual developments, even when the land has been purchased at an appropriate price (e.g. due to extensive decontamination requirements). In these cases, some flexibility may be required subject to submission of a robust site-specific viability assessment.
- 7.19 This study demonstrates that the proposed CIL charges are set at a level which will ensure an appropriate balance between delivering affordable housing, sustainability objectives, necessary infrastructure and the need for landlords and developers to achieve a return in line with the NPPF.

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Report for: Cabinet 12th November 2019

Title: Revised Local Development Scheme

Report authorised by : Emma Williamson, Assistant Director, Planning, Building Standards and Sustainability

Lead Officer: Philip Crowther, Principal Planning Officer (x5686)

Ward(s) affected: All

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

1. Describe the issue under consideration

- 1.1 This report sets out the revised timetable for the Local Plan documents the Council is intending to prepare over the coming years. The revised Local Development Scheme (LDS) is intended to replace the current outdated LDS published in April 2016.
- 1.2 Regulatory Committee considered this item on 14th October and didn't seek any amendments and endorsed the recommendations below.

2. Cabinet Member Introduction

- 2.1 The LDS is a document setting out a timetable for the preparation of a new Local Plan for the Borough, alongside updates to the timetable for progression of the Wood Green Area Action Plan and the North London Waste Plan through to adoption, which is required by legislation. The LDS does not set out any draft or emerging policy content but is important to indicate to members, the public and businesses when the Council intends to prepare and consult on Planning Policy documents.

3. The Cabinet is requested to:

- 3.1 Approve the revised Local Development Scheme (LDS) at Appendix A for publication with immediate effect (12 November 2019) as noted and endorsed by Regulatory Committee.

4. Reasons for decision

- 4.1 Under Section 15 (1) of the Planning and Compulsory Purchase Act 2004 (as amended), the Council has a statutory duty to maintain an up-to-date LDS. The revised LDS fulfils this duty, reflecting the current timetable for the preparation of the Development Plan Documents (DPDs) that, when adopted, will comprise Haringey's Local Plan.

5. Alternative options considered

- 5.1 The option of not updating the LDS has been considered but is dismissed. Section 19 (1) of the Planning and Compulsory Purchase Act 2004 (as amended) requires that all DPDs be prepared in accordance with the LDS. This includes complying with the timetable contained in the LDS for each of the relevant DPDs. If the project timetables for preparing a DPD and that in the LDS differ significantly, this is likely to lead to a finding of non-compliance with the statutory legal test at the independent examination of the relevant DPD.
- 5.2 Therefore, the only valid option available is to revise the out-of-date timetable in the LDS to reflect the current timetable to satisfy the legal requirements of the Act.

6. Background information

- 6.1 The LDS is required to be published by law. The primary legislation, secondary legislation and national government guidance relating to LDSs comprises:
- The Planning and Compulsory Purchase Act 2004 (as amended) ('the Act');
 - The Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) ('the Regulations'); and
 - National Planning Guidance on Plan-making¹.
- 6.2 The Council must prepare and maintain a LDS as required by Section 15(1) of the Act and paragraph 003 of the National Planning Guidance on Plan Making.
- 6.3 The LDS is important because it is intended to keep the public and other stakeholders informed of the planning policy documents the Council has or is intending to prepare that will comprise a new Local Plan for the Borough. Importantly, it also establishes the timetable for when each document will be prepared, highlighting key milestones such as the public consultation stages. It also ensures that there is an up to date timetable for policy documents currently in process, including the North London Waste Plan and the Wood Green Area Action Plan (AAP).
- 6.4 The Council's current LDS was revised and adopted in April 2016. It saw the alterations to the Strategic Policies DPD, the Development Management Policies DPD, the Site Allocations DPD, and the Tottenham Area Action Plan all progress in tandem to the same timetable. In accordance with the current LDS timetable, adoption took place in 2017.
- 6.5 A further Regulation 18 consultation stage has been conducted on the Wood Green AAP since the current LDS was published, reflecting the fact that there are no confirmed plans for Crossrail 2, and to take into account further feedback and a change in Council priorities since the 2017 consultation

¹ <https://www.gov.uk/guidance/plan-making>

- 6.6 Delays to the North London Waste Plan are as a result of further work to be done on site selection and ensuring a robust assessment of these including addressing concerns of Enfield Council.
- 6.7 The LDS at Appendix A shows the existing and revised timetables for the preparation of these documents in process, as well as a new timetable for a new Local Plan, which will replace the Strategic Policies, Development Management Policies, Site Allocations and Tottenham Area Action Plan (AAP) .
- 6.8 There is no requirement to consult on an LDS or to submit to the Mayor of London or Secretary of State. There is no requirement to include Supplementary Planning Documents (SPDs) or Neighbourhood Plans in the LDS.

7. Contribution to strategic outcomes

- 7.1 The completion of key planning documents assists in the delivery of many Borough Plan priorities. Not only does it enable the Council to better manage development in the Borough, but assist in the delivery of other corporate priorities around regeneration, economic development and housing delivery including:
- identifying sufficient land for Haringey's future housing and economic development needs;
 - focusing new development to where it can be best managed;
 - securing inward investment through the development of key strategic sites;
 - assisting with land assembly required to bring about comprehensive development that maximises the delivery of community benefits;
 - ensure Wood Green town centre fulfils its potential as a thriving and distinctive metropolitan centre;
 - securing and sustaining the vitality and viability of our District and Local Centres and designated employment areas; and
 - enhancing the quality and capacity of social and physical infrastructure required to support growth and achieve more sustainable communities.

8. Statutory Officers comments

Finance

- 8.1 The preparation and publication of the LDS itself is met within existing Planning Policy Team staff budgets. The ongoing budget requirements of the LDS/ Local Plan preparation are being addressed in the formulation of the new draft Budget and MTFS.

Procurement

- 8.2 Procurement were consulted and there are no implications arising from the report.

Legal

- 8.3 The Assistant Director of Corporate Guidance has been consulted on the preparation of this report and comments as follows.
- 8.4 Under section 15 (1) of the Planning and Compulsory Purchase Act 2004 (as amended) local planning authorities must prepare and maintain a Local Development Scheme (LDS).
- 8.5 The local planning authority must revise their LDS at such time as they consider appropriate or when directed to do so by the Secretary of State or the Mayor of London.
- 8.6 The LDS must specify the following:
- the local development documents which are to be development plan documents;
 - the subject matter and geographical area to which each development plan document is to relate;
 - which development plan documents (if any) are to be prepared jointly with one or more other local planning authorities;
 - any matter or area in respect of which the authority have agreed (or propose to agree) to the constitution of a joint committee under section 29;
 - the timetable for the preparation and revision of the development plan documents; and
 - such other matters as are prescribed.
- 8.7 LDSs are subject to direction by the Secretary of State and / or the Mayor of London and these must be complied with².
- 8.8 To bring the LDS into effect, the Council must in due course resolve that the scheme is to have effect and in that resolution specify the date from which the scheme is to have effect.
- 8.9 Local planning authorities should publish their LDS on their website.

Equality

- 8.10 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.

² <https://www.legislation.gov.uk/ukpga/2004/5/section/15>

- 8.11 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.
- 8.12 The LDS will have a positive impact on those groups with protected characteristics by setting out transparently the Council's timetable for producing Local Plan documents to facilitate engagement in those documents from as wide a variety of people as possible. Detailed equality impact assessment issues will be considered when any new policy document emerges.

9. Use of Appendices

Appendix A: Proposed Revised Local Development Scheme

10. Local Government (Access to Information) Act 1985

Background documents:

Current Local Development Scheme (adopted April 2016)

https://www.haringey.gov.uk/sites/haringeygovuk/files/haringey_lds_1st_april_2016.pdf

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Local Development Scheme

November 2019

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1. Introduction

About the Local Development Scheme

- 1.1 The Local Development Scheme (LDS) sets out the timetable for the preparation and review of the Council's planning policy documents. The LDS is required to be published by law. The primary legislation relating to LDSs is the Planning and Compulsory Purchase Act 2004¹ (as amended) ('the Act'). The secondary legislation relating to LDSs is The Town and Country Planning (Local Planning) (England) Regulations 2012² (as amended) ('the Regulations'). The national government guidance relating to LDSs is in the National Government Guidance on plan-making (paragraph 003)³
- 1.2 The Council must prepare and maintain a LDS as required by Section 15(1) of the Act and paragraph 003 of the Guidance on plan-making. Having an up-to-date LDS is important to ensure that "local communities and interested parties can keep track of progress" of Local Plans.

What must the LDS include?

- 1.3 The LDS must specify:
- Local development documents which are to be 'development plan documents' (i.e. Local Plan policies);
 - The subject matter and geographical area to which each document is to relate;
 - Which (if any) are to be prepared jointly with one or more other local planning authorities;
 - Any matter or area in respect of which the authority has agreed (or proposes to agree) to the constitution of a joint committee;
 - The timetable for the preparation and revision of the documents; and
 - Such other matters as are prescribed.

When does the LDS take effect?

- 1.4 To bring the LDS into effect, the Council must resolve that the scheme is to have effect and in the resolution specify the date from which the scheme is to have effect⁴. This LDS takes effect from 12th November 2019 and supersedes the previous LDS from April 2016.

When can the LDS be revised?

- 1.5 The Council may revise its LDS "at such time as they consider appropriate"⁵.

Publicising the LDS

- 1.6 The Council must make the following available to the public⁶:
- The up-to-date text of the LDS – provided as section 2 to this document;
 - A copy of any amendments made to the LDS – provided as section 3 to this document; and
 - Up-to-date information showing the state of the Council's compliance (or non- compliance) with the timetable.
- 1.7 The Council is required to publish the LDS on its web site and keep it up to date. The LDS is available on the Council's planning policy web pages⁷.

¹ <http://www.legislation.gov.uk/ukpga/2004/5/contents>

² <http://www.legislation.gov.uk/uksi/2012/767/regulation/18/made>

³ <https://www.gov.uk/guidance/plan-making>

⁴ Section 15(7) of the Act

⁵ Section 15(8) of the Act

⁶ Section 15(9A) of the Act

⁷ <https://www.haringey.gov.uk/planning-and-building-control/planning/planning-policy/local-plan/local-development-scheme-lds>

How does the LDS relate to the Local Plan and Neighbourhood Plans?

- 1.8 The preparation or revision of a Local Plan document must be “in accordance with” the LDS. There is no requirement to list Neighbourhood Plans in the LDS. The latest information on Neighbourhood Planning in the Borough is available on the Council’s planning policy web pages⁸.

Monitoring the LDS

- 1.9 The Council publishes an ‘Authority Monitoring Report’ (AMR) on an annual basis to report on the implementation of its planning policies and other matters. The AMRs for each year are available on the Council’s planning policy web pages. The Council’s AMR must contain the title of the Local Plans specified in the Council’s LDS. In relation to those documents it should state:
- The timetable specified in the Council’s LDS for the document’s preparation;
 - The stage the document has reached in its preparation; and
 - If the document’s preparation is behind the LDS timetable, the reasons for this; and
 - Where any Local Plan specified in the Council’s LDS has been adopted or approved within the AMR monitoring period, a statement of that fact and the date of adoption or approval.
- 1.10 The NPPG is clear that “Up-to-date and accessible reporting on the LDS in an Authority’s Monitoring Report is an important way in which Local Planning Authorities can keep communities informed of plan making activity”⁹. There is however no requirement to consult on an LDS or to submit to the Mayor of London or Secretary of State.

⁸ <https://www.haringey.gov.uk/planning-and-building-control/planning/planning-policy/local-development-framework>

⁹ Paragraph 003 of the NPPG

2. Local Development Scheme

2.1 The following tables outline the key stages of Plan development, including timetables for consultation.

New Local Plan

2.2 The new Local Plan will encompass a full review of the existing adopted Local Plan documents incorporating the Strategic Policies, Development Management Policies, Site Allocations and Tottenham Area Action Plan (AAP). This will incorporate a wide range of subject matter including new and revised site allocations, retail and employment, housing, affordable housing, open space, leisure and culture, climate change, flooding, transport, air quality and biodiversity policies. It will be subject to an Integrated Impact Assessment and will also result in the publication of a new Proposals Map. Community engagement on the emerging Plan is undertaken in accordance with the regulations and the adopted Haringey Statement of Community Involvement

New Local Plan (Borough Wide)						
	Local Plan Issues and Options	Draft Local Plan	Proposed Submission Local Plan	Submission and Examination	Adoption	Key Risks
Regulation	Pre- Regulation 18	Regulation 18	Regulation 19	Regulations 22-25	Regulation 26	Government reforms e.g. Planning Green Paper, Brexit and market uncertainty, London Plan Inspectors' report and recommendations, Decisions on Crossrail 2 stations, Joint working with other Councils through the Duty to Cooperate, Staff and resources Planning Inspectorate resources and timetabling.
Key Dates	March-May 2020 Pending	October-December 2020 Pending	April – June 2021 Pending	July-December 2021 Pending	February 2022 Pending	
What happens?	The first opportunity for residents, businesses and other local stakeholders to help shape the new Local Plan from the beginning, identifying key issues the Borough faces and preferences for various possible options.	The Council will consult interested parties and statutory consultees on a full draft of the Plan to consider refined options before the final document is produced.	The Council will publish the Local Plan which is followed by a minimum 6-week period when formal representations can be made to it.	The Council will submit the Local Plan to the Secretary of State via the Planning Inspectorate. A Planning Inspector will examine the document to check for compliance with the legislation and tests of soundness. The Council may need to consult on Proposed Modifications	The Council will adopt the changes to the Local Plan following consideration of the Inspector's recommendations following the examination	

- 2.3 The Wood Green AAP is at an advanced stage of preparation, and sets policies and site allocations to manage growth within the Wood Green and Haringey heartlands area.

Wood Green AAP (Wood Green and Haringey Heartlands)						
	Issues and Options	Preferred Option	Proposed Submission	Submission and Examination	Adoption	Key Risks
Regulation	Pre- Regulation 18	Regulation 18	Regulation 19	Regulations 22-25	Regulation 26	
Key Dates	8 Feb – 20 March 2016	14 February - 31 March 2017 and 1 February – 16 March 2018	February – March 2020	May – October 2020	January 2021	
What happens?	Completed	Completed	Pending	Pending	Pending	
	The Issues and Options stage represented the very first stage in the AAP's production. It identified the key issues, challenges and opportunities facing the area and set out four different options, including an option favoured by the council, for how these challenges might be addressed and opportunities realised.	The Preferred Option consultation represented stakeholders' key opportunity to have their say on the content included within the AAP. A further Regulation consultation was held in Spring 2018 due to the lack of confirmation on Crossrail 2 and the implications this has for the level of growth the area could accommodate.	The Council will publish the AAP which is followed by a minimum 6-week period when formal representation can be made to it.	The Council will submit the Local Plan to the Secretary of State via the Planning Inspectorate. A Planning Inspector will examine the document to check for compliance with the legislation and tests of soundness. The Council may need to consult on Proposed Modifications.	The Council will adopt the changes to the Local Plan following consideration of the Inspector's recommendations following the examination	Government reforms e.g. Planning Green Paper, Brexit and market uncertainty, London Plan Inspectors' report and recommendations, Decisions on Crossrail 2 stations, Joint working with other Councils through the Duty to Cooperate, Staff and resources, Planning Inspectorate resources and timetabling.

North London Waste Plan (NLWP)

- 2.4 The North London Waste Plan is also at an advanced stage of preparation and provides clear policies for the management of waste, recycling and disposal across the relevant North London sub-region, and it enables Haringey to meet its strategic waste apportionment requirements as determined by international, national and regional waste policies and guidance.

North London Waste Plan (Haringey, Islington, Barnet, Enfield, Camden, Waltham Forest and Hackney Councils)					
	Draft Policies	Publication Policies	Submission and Examination	Adoption	Key Risks
Regulation	Regulation 18	Regulation 19	Regulations 22-25	Regulation 26	
Key Dates	30 July – 30 September 2015	1 March – 12 April 2019	August 2019 – February 2020	June 2020	
What happens?	Completed	Completed	Pending	Pending	
	This provided the first opportunity for stakeholders to make comments on the strategy for future waste management in North London, including potential locations for new facilities across the area, and draft policies.	The Council published the NLWP which was followed by a 6-week period where formal representation were invited on the DPD	The Council will submit the NLWP to the Secretary of State via the Planning Inspectorate. A Planning Inspector will examine the document to check for compliance with the legislation and tests of soundness. The Council may need to consult on Proposed Modifications.	The Council will adopt the changes to the NLWP following consideration of the Inspector's recommendations following the examination	Government reforms e.g. Planning Green Paper London Plan Inspectors' report and recommendations Joint working with other Councils Staff and resources Planning Inspectorate resources and timetabling

3. Amendments Made to the 2016 Version of the LDS

- 3.1 The 2019 LDS supersedes the previous LDS from April 2016. The amendments made to the 2016 version are set out below. The new Local Plan is a new introduction to the LDS and incorporates all adopted DPDs. These were contained within the 2016 LDS and were listed as the Development Management Policies, Site Allocations, Tottenham Area Action Plan and alterations to the Strategic Policies, all of which were adopted in July 2017. There is therefore no timetable to amend in respect of these adopted documents.

2016 LDS		2019 LDS	
Document	Key dates	Amendments made	Reason
Wood Green Area Action Plan	First Consultation February – March 2016 Second Consultation October – November 2016 Third Consultation Not included Submission Consultation April – May 2017 Adoption December 2017	First Consultation No amendment Second Consultation February – March 2017 Third Consultation February – March 2018 Submission Consultation February – March 2020 Adoption January 2021	A further Regulation 18 consultation was introduced and held in Spring 2018 due to the lack of confirmation on Crossrail 2 and the implications this has for the level of growth the area could accommodate. This therefore delayed the timetable by over 1 year.
North London Waste Plan	First Consultation May – June 2015 Submission consultation June – July 2016 Adoption March 2017	First consultation No amendment Submission consultation March – April 2019 Adoption June 2020	There was a delay in between Regulation 18 (preparation of a local plan) and Regulation 19 (publication of a local plan before submission to the Secretary of State) because of a pause in the work of bringing the plan forward following some concerns raised principally by Enfield Council.

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Report for: Cabinet 12 November 2019

Title: Haringey's Air Quality Action Plan 2019-24 and authorisation of fixed penalty notices for idling

Report authorised by: **Stephen McDonnell – Director of Environment and Neighbourhoods**

Lead Officer: Felicia Ekemezuma – Commercial Environmental Health, Pollution and Trading Standards Manager
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Ward(s) affected: All

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

1. Issue Under Consideration

- 1.1. Haringey is required to have an Air Quality Action Plan (AQAP) as part of the Council's duty to manage local air quality. The AQAP sets out the commitment and actions Haringey will take to improve air quality between 2019 and 2024.
- 1.2. Schedule 11 of the Environment Act 1995 requires Local Authorities to consult on their AQAP with a range of persons and organisations. It was agreed on the 2nd April 2019 by Cabinet that the draft AQAP could go for public consultation which has now taken place and the results of which can be found in report attached in Appendix A.
- 1.3. The associated sanction of issuing fixed penalty notices to drivers who commit an idling offence by keeping their engine running whilst stationary is also being considered because (i) the AQAP consultation showed many respondents favoured stricter enforcement measures for idling, and (ii) it is a condition for participating in the Pan London Anti-Idling Project funded by the Mayor of London.

2. Cabinet Member Introduction

- 2.1. The Air Quality Action Plan 2019-24 lays out the Council's current and future ambitions to reduce air pollution. As with much of London, improving air quality is a key priority in Haringey because of the negative effect it has on our residents, particularly older, disabled residents and our children. The air quality agenda affects all aspects of the Council's work and our activities go hand in hand with our commitments to combatting climate change, developing walking, cycling and the wider use of public transport.

3. Recommendations

3.1. Cabinet are asked to:

- Consider the outcome of the consultation on the draft AQAP set out in Appendix A of the report and the Equality Impact Assessment screening tool set out in Appendix C.
- Approve the revised Air Quality Action Plan 2019 - 24 in Appendix B; and
- Approve the use of fixed penalty notices pursuant to the Road Traffic (Vehicle Emissions) (Fixed Penalty) (England) Regulations 2002 to sanction drivers who have committed a stationary idling offence.

4. Reasons for Decision

4.1. Air Quality Action Plan 2019-24

4.2. A copy of the amended AQAP following consultation is attached to this report as Appendix B. The consultation is summarised in section 7 below. The draft AQAP 2019-2024 has been developed with consideration to priority 3 – Place of the Borough Plan 2019-23, in that it will help to deliver an environment that is safe, clean, green and where people can lead active and healthy lives.

4.3. Like other London Boroughs, Haringey was declared an Air Quality Management Area (AQMA) in 2001 due to air quality levels for two key pollutants exceeding statutory limits - Nitrogen Dioxide (NO₂) and fine particulates (PM₁₀).

4.4. Under Part 4 of the Environment Act 1995, Haringey is required to provide an AQAP to address the areas of poor air quality identified within the AQMA.

4.5. There is strong evidence that NO₂ and PM₁₀ are harmful to health in the following ways:

- **Short term exposure:** - is associated with worsening symptoms of pre-existing lung disease and asthma, as well as increased risk of cardiovascular events such as myocardial infarctions and stroke;
- **Long term exposure:** - is associated with an increased risk of developing cardiovascular disease, cancer, reduced lung function and low birth weights (higher risk of complications);
- **Vulnerable Groups** – age, the very young and old are high risk groups as well as those with pre-existing conditions i.e. diabetes, respiratory disease and obesity. Poor diet, deprivation and proximity to pollution sources also have an impact on health inequalities.

4.6. NO₂ is created when fuel is burnt, the main sources have been combustion engines, heating plants and construction plant/vehicles.

4.7. PM₁₀ is made up from a variety of substances i.e. soot, dust and secondary particles formed by the reaction of other pollutants in the air. The main sources of particulate matter are combustion engines, biomass heating plants (wood fuelled), brake and tyre wear, construction activity and HGVs.

4.8. The AQAP 2019-24 aims to tackle these areas of poor air quality. It sets out 25 actions and commitments, developed under the following seven broad themes in order of priority, that propose to reduce air pollution in Haringey over the next five years:

- **Monitoring and other core statutory duties:** maintaining monitoring networks is critical for understanding where pollution is most acute, and what measures are effective to reduce pollution. There are also a number of other very important statutory duties undertaken by local authorities, which form the basis of action to improve pollution;
- **Emissions from developments and buildings:** emissions from buildings account for about 15% of the Nitrogen Oxides (NOX) emissions across London so are important in affecting Nitrogen Dioxide (NO2) concentrations;
- **Public health and awareness:** raising increased awareness can drive behavioural change to lower emissions as well as to reduce exposure to air pollution;
- **Delivery servicing and freight:** vehicles delivering goods and services are usually light and heavy-duty diesel-fuelled vehicles with high primary NO₂ emissions;
- **Borough fleet actions:** our fleet includes light and heavy-duty diesel-fuelled vehicles such as minibuses and refuse collection vehicles with high primary NO₂ emissions. Tackling our own fleet means we will be leading by example;
- **Localised solutions:** these seek to improve the environment of neighbourhoods through a combination of measures; and
- **Cleaner transport:** road transport is the main source of air pollution in London. We need to help facilitate a change to walking, cycling and ultra-low emission vehicles (such as electric).

4.9. The plan brings together and references several policies and strategies across the Council including:

- Haringey Transport Strategy
- Haringey Carbon Reduction Strategy
- Haringey Development Plan
- Parks and Open Spaces Strategy
- Low Emission Vehicle Strategy Parking Permits Strategy (Ongoing)

4.10. In response to the consultation, most respondents favoured traffic reducing interventions such as pedestrianisation, road closures, temporary and permanent car free days as well as green infrastructure. The consultation is summarised in section 7 below.

4.11. Fixed penalty notices for idling

4.12. The Council has power to authorise the imposition of fixed penalty notices on drivers who commit an idling offence, i.e. leaves their engine running while stationary and fails to stop the engine running when requested to do so.

4.13. This had not previously been recommended because research had shown that few fixed penalty notices were served in boroughs where officers have been authorised to issue such notices. Therefore, it did not appear the most cost-effective means of reducing air pollution. However, this position has been reviewed in light of the points outlined below.

4.14. Idling was one of the most discussed problems by respondents to the AQAP consultation, with 10% of respondents requesting stricter enforcement measures around schools and other common places for idling. The results of the consultation are summarised in section 7 below.

- 4.15. Fixed penalty notices would be a useful tool as well as a positive message in tackling idling because they would give more weight to existing measures used to promote behavioural change. For example, the Council encouraged drivers to switch off their engines at school gates during Clean Air Day in June 2019. The schools involved were Bounds Green and Coleridge Primary School. The Council has also sent letters to bus and coach companies and mini cab operators within the borough advising them of the health risks associated with idling and requesting that they remind staff not to leave their engines running whilst stationary. It is likely that these measures would be taken more seriously by drivers if officers were authorised to enforce them by way of fixed penalty notices.
- 4.16. The key implication associated with enforcement for idling would be infrastructure and staffing costs.
- 4.17. To help assist, Haringey along with 27 other London Boroughs will take part in a pan-London anti-idling project funded by the Mayors Air Quality Fund (MAQF), coordinated by City of London Corporation and London Borough of Camden. The Fund (£500,000) will provide 2 full time project officers to deliver the following within Haringey:
- Idling action events,
 - Workshops for schools; and
 - Engage with businesses who have their own fleets
- 4.18. Enforcement to combat idling is a condition of participation in the project. For the purpose of the project, enforcement would include:
- A website page outlining fines and penalties, and a Council contact to report idling.
 - Ideally, introducing an order to allow for higher fines than the regulatory minimum (as per Westminster, Islington etc.). Although this is not essential, it is likely that this will make the process easier and more viable for boroughs. The Idling Project will share resources to assist.
 - Press release outlining the commitment to enforce against idling and detailing the fines (to be undertaken as a single borough or collectively).
 - Dedicated officer/s (as per Westminster's Marshalls scheme) or idling enforcement formally incorporated into the role of street marshals/traffic wardens etc. This does not mean they will be required to routinely enforce to the detriment of their day-to-day roles but, at a minimum, there must be a capability and a public commitment to enforce so that idling problems and complaints can be dealt with effectively.
- 4.19. Each borough will be required to provide the following Enforcement Monitoring data annually:
- The number of staff undertaking on-street enforcement as part of their role.
 - The number of idling drivers spoken to by these officers (even if not fined).
 - Number of penalty notices served.
 - Idling complaints received. This will be recorded in complaints software.
- 4.20. Match funding from boroughs will consist of:
- Purchasing consumables for the idling action days (leaflets, car stickers etc).
 - Officer time for supporting the idling behaviour change project.
 - Officer time for the enforcement work (this could be street enforcement officers/traffic wardens etc as per above).
- 4.21. Therefore, it is recommended that officers be authorised to impose fixed penalty notices because it is now clear that the cost implications would be lower (given the

funding from the Mayor of London), residents appear to favour such stricter enforcement measures and it would strengthen the Council's ability to tackle this source of air pollution.

5. Alternative options considered

5.1. The development of an AQAP is a statutory requirement and therefore there are no lawful alternative. The proposed draft plan integrates a number of key strategies and Council services, that all have an impact on air quality and therefore it is considered the best option.

5.2. Three options have been considered with regard to taking enforcement action against drivers who commit stationary idling offences: i) do nothing ii) continue to encourage behaviour change using existing measures but without enforcement by way of fixed penalty notices iii) authorise the issue of fixed penalty notices as well as encouraging behaviour change. The reasons why options i) and ii) are not recommended are set out in 5.3 and 5.4. below.

5.3. Do nothing

- Whilst issuing fixed penalty notices against drivers who commit stationary idling offences is unlikely to have significant effect on air quality by itself, it is nevertheless part of a tool kit for changing the behaviour of drivers. Traffic is the main cause of poor air quality in Haringey and so changing drivers' habits is an important step towards improving air quality. In order to change the culture and behaviour of drivers, idling can be tackled through a variety of measures.
- The consultation showed that addressing idling is an important issue for Haringey residents. If the Council does nothing, it would not be doing all it reasonably can to tackle air quality issues related to traffic, which is the biggest source of poor air quality in Haringey and a significant concern for its residents.

Therefore, this option is not recommended.

5.4. Continue to encourage behaviour change using existing measures but without enforcement by way of fixed penalty notices.

- The AQAP (2019-2024) includes a range of measures to tackle air quality within the Borough. Measures include education / behaviour change.
- Haringey, like many other local authorities, has encouraged behavioural change in order to reduce idling. Some of our recent actions are outlined in paragraph 4.12 above and similar action could be continued in the future without the use of fixed penalty notices. However, whilst these actions will have some effect, if officers are authorised to issue fixed penalty notices, this will give more weight to such requests for drivers to switch their engines off whilst stationary and so would be likely to make the existing measures more effective.

Therefore, this option is not recommended.

6. Background information

6.1. The Haringey AQAP 2019-24 replaces the previous plan which ran from 2011-18. In essence the new plan builds on some of the more effective actions contained within the old plan as well as introducing new ones such as:

- The addition of new/more air quality monitoring points throughout the borough, particular near those school most affected by pollution.
- Development of a School Street Action Plan.
- Considering pollution from canal boats
- Developing guidance for assessment of accumulative air quality impact at major development sites.
- Reassessment of the smoke control zones and promotion of the zones by way of an awareness campaign.
- Inclusion of air quality measures in all major strategies/policies throughout the Council.
- Replacing at least 84% Council fleet with ULEV by 2021 provided suitable replacement vehicles are available.

6.2. It is a legal requirement for Local Authorities to work towards the air quality objectives by formulating an action plan under Part IV of the Environment Act 1995 and relevant regulations made under that Act. The Council is also expected to meet the requirements of the Mayor of London's London Local Air Quality Management statutory process¹. This is because the Mayor has power to direct the Council to act in respect of air quality and the Council must comply with any such direction.

6.3. The Mayor of London has stated in the London Local Air Quality Management policy guidance 2016 that he expects air quality action plans to be updated at least every 5 years.

6.4. It is an offence to leave a vehicle's engine idling unnecessarily whilst stationary, by virtue of regulation 98 of the Road Vehicles (Construction and Use) Regulations 1986/1078. There are exceptions in the legislation where it is deemed necessary to leave a vehicle's engine idling whilst stationary and therefore not an offence. For example:

- Owing to the necessities of traffic e.g. when vehicles are queuing at traffic lights;
- Where an engine is being run so that a defect can be traced and rectified e.g. when a broken-down vehicle is being attended to by a breakdown / recovery agent;
- Where machinery on a vehicle requires the engine to be running e.g. where the engine has to be on to defrost the windscreen in winter, or to power equipment on a refuse vehicle;
- Where a vehicle is propelled by gas produced by the functioning of plant carried on the vehicle.

6.5. The Road Traffic (Vehicle Emissions) (Fixed Penalty) (England) Regulations 2002 give the Council power to authorise for any officer of the Council, and any other persons authorised, to stop idling offences in its area by requiring a driver to stop their engine running and to issue a fixed penalty notice. Officers should first warn drivers and allow them the opportunity to switch off their engines. Fixed penalty notices should only be given if the driver fails to comply.

6.6. A fixed penalty notice must be issued as soon as reasonably practicable and not later than 24 hours after the commission of the stationary idling offence. The notice must give information about the relevant person and vehicle, the way in which the penalty can be paid, the consequences of not paying and steps that can be taken to request a waiver or reduction of the penalty or a hearing. The amount of the fixed penalty notice is set by

¹ LLAQM Policy and Technical Guidance. <https://www.london.gov.uk/what-we-do/environment/pollution-and-air-quality/working-boroughs>

legislation at £20 increasing to £40 if not paid within the period for paying the penalty (which must be at least 28 days).

- 6.7. All authorised personnel must receive training to ensure they are fully conversant with and follow the provisions of guidance issued under the 1995 Act at all times when carrying out enforcement work.
- 6.8. All enforcement personnel must be able to produce evidence of their authorisation by Haringey Council and so would be issued with identity badges with a unique personal identification code and have access to a communication network (e.g. a mobile phone or radio) to summon assistance if required. Haringey can retain income generated from fixed penalty notices.
- 6.9. If approval to issue fixed penalty notices is agreed, publicity will be carried out and enforcement officers will be trained. The use of fixed penalty notices would be expected from April 2020.

7. Statutory and Public Consultation

7.1. The public consultation took place between 28th May and the 30th July 2019.

7.2. The Council used a variety of public consultation techniques:

- An online questionnaire available in accessible formats was launched on the Council's website on the 28th of June;
- Information leaflets and questionnaires were available at all major libraries;
- Local Press i.e. Haringey People, Haringey and Enfield Independent
- Members Newsletter
- Schools Newsletter
- 3 public, 2 elected members and 2 specialist groups (Transport Forum and Climate Change Forum) workshops were delivered to provide opportunities for further stakeholder engagement and:
- Regular tweets to encourage attendance of workshops and completion of questionnaire.

7.3. The Environment Act 1995 and the London Local Air Quality Management Framework also required that we consult key statutory parties and agencies during the development of our AQAP. The following parties were contacted directly by email.

- Local MPs and Members
- Secretary of State
- Environment Agency
- Transport for London
- All neighbouring local authorities, in particular the North London Cluster Group
- Bodies representing local business interests and other organisations such as North London Chamber of Commerce and Enterprise
- Local schools and colleges

7.4. The Greater London Authority (GLA) (including the Mayor of London) were consulted during the development and consultation stages of the plan. They stated that it would appear that a lot of work has clearly gone into it and there are some good actions. They however, wanted more defined targets in relation to the Council's fleet and the localised solutions. These amendments have been made and agreed with the GLA.

- 7.5. A full analysis of the responses and comments made during the consultation are provided in the report attached as Appendix A.
- 7.6. A summary of the results of the consultation revealed that the proposed measures are generally acceptable and that a combination of complementary initiatives are key to creating a positive impact in both the short and longer-term air quality in Haringey:
- 7.7. All the responses were considered as required by Schedule 11 of the Environment Act 1995 and the plan amended as appropriate. Some of the measures and actions suggested by the respondents as part of the consultation were rejected in part because of factors including costs, effectiveness, timescales and feasibility of implementation or simply because these were considered outside the scope or responsibility of the local authority.

Monitoring and other core statutory duties: - Generally, respondents wanted more monitoring especially around schools and major developments with easy to understand data publicly available in hotspot areas. These comments were accepted, and the plan was changed to include some additional monitoring points and the supplying of monitoring data to London Air Quality Network. We are also scoping the possibility of presenting moderate and high pollution levels on the Clear Channel digital signs currently in Wood Green and hopefully broadening out to High Road Tottenham. Further specific suggestions were made that air quality monitoring should be carried out to assess the impact of GLA's low emission zones e.g. Wood Green and Tottenham High Road/Seven Sisters where only cleaner buses are being deployed. The impact assessment was deemed outside the responsibility of Haringey Council therefore not accepted. It should be noted however, that existing monitoring carried out may show any improved air quality in general.

- 7.8. **Emissions from developments and buildings:** - Respondents wanted Haringey to require all new developments to provide green space equivalent to 15% of the area, require zero emissions and reduce vehicle movements on major development sites where possible. Many of these suggestions are already considered by Haringey's Planning Strategy therefore no changes were made to the action plan. Furthermore, from 1st January 2020, all constant-speed engines. e.g. generators will be required to meet EC Emissions Stage V as part of the NRMM requirement, therefore no further modifications of the action plan were considered warranted.
- 7.9. **Public Health and Awareness Raising:** - A more direct public health campaign was suggested with more specific points i.e. idling, school audits, more liveable neighbourhood schemes and inviting the public to co-design activities. The Council is already putting more emphasis into education, raising awareness and promoting behaviour change. Most of the suggestions from the respondents were made around school actions were considered actionable and the plan was amended to include the school street action plan.
- 7.10. **Delivery Servicing and Freight:** - Respondents wanted cargo bikes to be promoted for local deliveries, workplace parking levies, enforcement for anti-idling and details on how Haringey will work with adjoining boroughs to minimise delivery traffic. Some of these suggestions were accepted and the Plan was amended to include a possible Low Emission Business Neighbourhood depending on additional funding being found. Some of the actions and measures suggested were rejected due to lack of appropriate funding or feasibility of implementation include for example: (1) Investing in renewable energy so we rely less on fossil fuels to power our homes, schools and businesses in Haringey; (2) customise GPS navigator to show the level of pollution in cars and on the hotspots being

transited and (3) incentivise deliveries to high street stores to outside of peak times to reduce emissions when people are at work.

7.11. **Borough Fleet:** - Comments included a reduction in the number of borough fleet and replacement of the most polluting vehicles with hydrogen, electric or hybrids. Clear commitment to incentivise walking and cycling for work purposes as opposed to low emission vehicles. The Transport Strategy present the Council's vision on traffic in the borough and already incorporates most of the above suggestions. The plan was amended to give more specific targets i.e. replacing all internal fleet with ULEV by 2021 and incentives to encourage a progressive replacement of passenger transport was added to the plan following comments from the GLA.

7.12. **Localised Solution:** - Comments included implementation of Controlled Parking Zones (CPZs) similar to that in Islington, remove the term 'trial' from road closures around schools and implement school streets for every school even on main roads. The School Street Action Plan was incorporated into the plan, but no further changes were made because the Transport Strategy already present the Council's vision on traffic in the borough. Transport and parking related comments not actioned upon by the AQAP will be followed up in a Transport Planning Policy Statement due for publication.

7.13. **Cleaner transport:** - Comments and suggestions included additional and improved infrastructure for cyclists, viable alternatives to cars i.e. car sharing, cycling and public transport, commitment to at least one car free day per year. Other suggestions included getting the public to assist with the anti-idling project, enforcement for idling, green schemes around school and the introduction of low traffic neighbourhoods throughout the borough. Many of the suggestion are already covered within the Transport Strategy, the Healthy Street Everyday project and the anti-idling project funded by the Mayor of London which requires a number of car free activities and a commitment to enforcement by the end of 2019.

7.14. A total of 248 general public consultees responded to the AQAP consultation:

- 84% were Haringey residents;
- 1% Haringey Businesses
- 8% Work in Haringey
- 5% Regular visitors
- 2% Other

7.15. Eleven consultation responses were received from statutory stakeholders.

7.16. The majority of respondents most interested in air quality were age between 30-44:

- 0% <24
- 5% 24-29
- 40% 30-44
- 30% 45-59
- 7% 60-64
- 12% 65-74
- 2% 75-84
- 1% 85 -94
- 2% did not provide an answering to this question

7.17. Response were from a variety of people including:

- 4% Deafness or partial loss of hearing
- 0% Developmental disorder
- 2% Mental ill health

- 2% Physical disability
- 2% Other disability
- 1% Learning disabilities
- 4% Long term illness or condition
- 46% No disabilities
- 39% did not provide an answer to this question.

7.18. 85% of the respondents said air pollution is very important, and

7.19. 41% agreed that the seven actions identified by priority will meet the needs of the borough and help reduce pollution. However, 21% did not know, which suggest that many residents are either indifferent or not aware of air pollution issues and hence more education and promotion would be helpful.

7.20. 33% suggested that the proposed priority ranking of actions was inappropriate. There were several responses that suggested the draft AQAP did not put enough emphasis on protecting and improving public health, and in particular, reducing children's exposure to harmful NO₂ and PM₁₀s. Tacking idling across the borough and around schools especially was one of the main topics of responses. Suggestions included:

- Assist anti-idling projects by supplying business card size stickers with messages e.g. 'please switch off your engine, help to save a child's life' for public use;
- Get bus drivers to switch off engines at stands e.g. Tottenham Lane;
- Penalties for drivers parking on double yellow lines while waiting for their children;
- Enforce and fine drivers for vehicle idling around schools;
- Education and campaign against idling;
- Reduce cars and emissions near playgrounds;
- Introduce low traffic neighbourhoods all over the borough especially around schools and decrease the amount of road traffic that passes through Haringey.

7.21. These comments have all been taken into consideration and incorporated in the plan where feasible.

7.22. Comments and responses related to other service areas and have been passed on for consideration/implementation, accordingly, as outlined in the consultation responses in Appendix A.

8. Contribution to strategic outcomes

8.1. The AQAP aligns with the Borough Plan's vision and objectives to actively manage and drive improvements in air quality across the borough. Improving air quality and reducing exposure to pollutants contributes to positive outcomes across all the key priorities:

- Priority 1 - Housing - a safe, stable and affordable home for everyone, whatever their circumstances, by ensuring all new developments are air quality neutral, energy efficient and incorporate and well-located green space and infrastructure to reduce pollution such as bicycle storage.
- Priority 2 - People - our vision is a Haringey where strong families, strong networks and strong communities nurture all residents to live well and achieve their potential, by working with Public Health to promote modal shift to alternative transportation and improving air quality around schools.

- Priority 3 - Place - a place with strong, resilient and connected communities where people can lead active and healthy lives in an environment that is safe, clean and green, by reduce pollution on the whole.
- Priority 4 - Economy - a growing economy which provides opportunities for all our residents and supports our businesses to thrive by considering the implementation of low emission business neighbourhoods which will help reduce costs; and
- Priority 5 - Your Council - the way the Council works, by working in partnership with our internal and external stakeholder and ensuring all major strategies and policies are integrated within the plan.

8.2. The Borough Plan also considers equality principles, partner statements and promotes key pledges for our relationships with residents, business and the voluntary and community sector.

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

9.1. Finance

9.2. This report recommends of the adoption of the Air Quality Action Plan 2019-2024 and to approve the use of fixed penalty notices for drivers whom commit stationary idling offences.

9.3. The costs incurred to date relating to the development of this plan and the consultation process has been contained within existing budgetary resources.

9.4. The full AQAP is detailed in Appendix B which details the all of the actions and identifies the funding requirements particularly the high dependency upon further external funding in order to be able to fully implement these measures.

9.5. Officers will continue to identify external funding sources and where appropriate use of s106 funding to deliver the outcomes outlined in the action plan and the GLA have shown a very keen interest in supporting this work.

9.6. The extent of Council's ability to deliver its Air Quality strategic objectives will be significantly dependent on the external funding that it receives.

9.7. The monitoring of the financial expenditure for agreed capital and revenue projects supporting these strategies will be included in the regular Council wide monitoring procedures and will be subject to the normal approval process.

10. Procurement

10.1. This report recommends of the adoption of the Air Quality Action Plan 2019-2024.

10.2. The costs associated with implementing this decision are mostly staff related any future agreed actions will be funded from current service resources.

10.3. Officers will continue to identify external funding sources and where appropriate use of s106 funding to deliver the outcomes outlined in the action plan.

10.4. The monitoring of the financial expenditure for agreed capital and revenue projects supporting these strategies will be included in the regular Council wide monitoring procedures and will be subject to the normal approval process.

11. Legal

- 11.1. Air quality standards and objectives are set out in the Air Quality (England) Regulations 2000. The Council has a duty to review the quality of air within their area under Part IV, section 82 of the Environment Act 1995.
- 11.2. Where the relevant standards and objectives are not being met, the Council has a duty to designate an air quality management area and prepare an action plan under sections 83 and 84 of the Environment Act 1995. It may revise that action plan from time to time,
- 11.3. The action plan must include the time(s) within which the Council proposes to implement its measures and include proposals submitted by the Mayor of London for the exercise of the Mayor's powers, by virtue of sections 84 and 86A of the Environment Act 1995.
- 11.4. Where preparing an action plan, by virtue of section 90 and schedule 11 of the Environment Act 1995 the Council must consult the Mayor of London, the Secretary of State, the Environment Agency, the Highway Authorities for the area, neighbouring local authorities, appropriate public authorities exercising functions in the vicinity, bodies representing local business interests, and other bodies or organisations as considered appropriate.
- 11.5. The Council must have regard to the guidance issued by the Mayor of London. The Mayor of London also has broad powers to direct the Council to act in respect of air quality, and the Council must comply with any such direction under section 85 of the Environment Act 1995.
- 11.6. By virtue of schedule 2 paragraph 11 of the Local Authorities (Functions and Responsibilities) (England) Regulations 2000/2853, the discharge of any function relating to the management of air quality can be the responsibility of either the full Council or the executive, depending on the choice of the individual Council. The Council has decided that such decisions should be made by the executive, as set out in Part 3 Section D of the Council's constitution: Local Choice Functions.
- 11.7. As set out in the body of the report, the Council has power to authorise officers and other persons to impose fixed penalty notices for vehicle idling under regulations 6, 12 and 13 of the Road Traffic (Vehicle Emissions) (Fixed Penalty) (England) Regulations 2002.
- 11.8. Functions relating to such fixed penalty notices are not specified as a function that may or must be the responsibility of full Council. Therefore, they are functions that must be responsibility by the Council's executive by virtue of section 9D of the Local Government Act 2000.

12. Equality

- 12.1. 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.

- 12.2. The three parts of the duty applies to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/belief, sex and sexual orientation. Marriage and civil partnership status apply to the first part of the duty.
- 12.3. Air pollution is associated with a number of adverse health impacts and it is recognised as a contributing factor in the onset of heart disease and cancer. There is a strong association between air pollution and equalities issues. Air pollution particularly affects the most vulnerable in society, including children and older people, and those with long-term health conditions. Moreover, areas with poor air quality are also often the less affluent areas, in which BAME communities constitute a relatively high proportion of the resident population
- 12.4. The Air Quality Action Plan will improve outcomes for individuals and groups who share protected characteristics including age, race and ethnicity, and disability. By taking action to mitigate the effects of air pollution, the Council is working to address a known inequality in terms of environmental quality.
- 12.5. An Equality Impact Assessment has been undertaken to support the Haringey Air Quality Action Plan. The Assessment provides further details on how the strategy will support work to tackle inequalities, such as those relating to health in Haringey. (See Appendix C)

13. Use of appendices

- Appendix A – Consultation Report
- Appendix B – Amended Air Quality Action Plan 2019-24
- Appendix C – EQIA

14. Local Government (Access to Information) Act 1985

- 14.1. Haringey Air Quality Action Plan 2010-2018:
https://www.haringey.gov.uk/sites/haringeygovuk/files/air_quality_action_plan_2010_-_2018.pdf
- 14.2. Report for Cabinet meeting on 2 April 2019 on the consultation for the draft Air Quality Action Plan 2019-2024:
https://www.minutes.haringey.gov.uk/documents/s107945/Cabinet_report%20AQAP%20FINAL13.03.19.pdf
- 14.3. Mayor of London's London Local Air Quality Management Policy Guidance 2016:
https://www.london.gov.uk/sites/default/files/llaqm_policy_guidance_llaqm.pg_16.pdf
15. External links – Haringey Council is not responsible for the contents or reliability of linked web sites and does not necessarily endorse any views expressed within them. Listing should not be taken as endorsement of any kind. It is your responsibility to check the terms and conditions of any other web sites you may visit. We cannot guarantee that these links will work all of the time and we have no control over the availability of the linked pages.

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Consultation Responses on London Borough of Haringey Air Quality Action Plan 2019-2024



This report provides a summary of the responses to the consultation on the Haringey's Draft Air Quality Action Plan 2019-2024 carried out between the 28th May to the 30rd July 2019. It has been produced to meet the requirements of Schedule 11 of the Environment Act 1995.

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1. Introduction and Overview

1.1. The draft Air Quality Action Plan (AQAP) was produced as part of the local authority's duty to London Local Air Quality Management. It outlines the actions that will be taken to improve air quality in London Borough of Haringey between 2019-2024. The proposed actions were grouped into seven categories by priority¹. Schedule 11 of the Environment Act 1995 requires the Council to consider any representations made in accordance with the consultation. Therefore, public consultation was carried out between the 28th May 2019 to 30 July 2019.

1.2. Three main groups were consulted during the development of the Air Quality Action Plan. these comprised: -

- Internal stakeholders who will deliver the actions detailed in the plan
- Statutory consultees as required by the legislation
- The external stakeholders due to significant public interest in health issues and local air quality

1.3. **Internal Stakeholders:** The consultation of each relevant service areas was carried out before and during the development of the plan. This included the following service areas:

- Carbon Management & Homes for Haringey
- Development Management /Analyst & Systems Team
- Parks & Regeneration
- Public Health
- Smart travel
- Transport (including Parking Services Finance, Sustainable Transport – Operations, Sustainable Transport/Major Schemes Projects & Transport Planning)
- Strategic Procurement, Client & Commissioning
- Others (including Corporate Resources, Strategy & Communications, GLA and Enforcement Response)

¹ By order of priority, the following seven broad actions were proposed to reduce air pollution in Haringey:

1. *Monitoring and other core statutory duties: maintaining monitoring networks is critical for understanding where pollution is most acute, and what measures are effective to reduce pollution. There are also a number of other very important statutory duties undertaken by boroughs, which form the basis of action to improve pollution;*
2. *Emissions from developments and buildings: emissions from buildings account for about 15% of the Nitrogen Oxides (NO_x) emissions across London so are important in affecting Nitrogen Dioxide (NO₂) concentrations;*
3. *Public health and awareness raising increasing awareness can drive behavioural change to lower emissions as well as to reduce exposure to air pollution;*
4. *Delivery servicing and freight: vehicles delivering goods and services are usually light and heavy-duty diesel-fuelled vehicles with high primary NO₂ emissions;*
5. *Borough fleet actions: our fleet includes light and heavy-duty diesel-fuelled vehicles such as minibuses and refuse collection vehicles with high primary NO₂ emissions. Tackling our own fleet means we will be leading by example;*
6. *Localised solutions: these seek to improve the environment of neighbourhoods through a combination of measures; and*
7. *Cleaner transport: road transport is the main source of air pollution in London. We need to incentivise a change to walking, cycling and ultra-low emission vehicles (such as electric)*

- 1.4. Comments and queries made by each service areas were considered prior to external consultation. All staff working for Haringey Council were further consulted during the public consultation.
- 1.5. **Statutory consultees as required by legislation:** It is a legal duty under Environment Act 1995 and the London Local Air Quality Management Framework to consult specific parties and agencies during the development of any air quality strategies and action plans. The following parties were contacted directly by email.
- Residents
 - Local MPs and Members
 - Secretary of State
 - Environment Agency
 - Transport for London
 - All neighbouring local authorities, in particular the North London Cluster Group
 - Bodies representing local business interests and other organisations such as North London Chamber of Commerce and Enterprise
- 1.6. The Greater London Authority (GLA) was consulted during the development and consultation stages. They recommended more defined targets in relation to the Council's fleet and the localised solutions. These amendments were made, and the final draft agreed with the GLA. See Table 2 for full details of the GLA comments and amendments made to the plan as a result of them.
- 1.7. Eleven Statutory consultees responded to the consultation in total.
- 1.8. **External stakeholders:** the results of the consultation can be summarised as follows:
- 253 consultees responded to the AQAP consultation;
 - 85% were from Haringey resident;
 - 96% of the respondents said air pollution is important if not very important;
 - 42% agreed that the seven actions identified by priority will meet the needs of the borough and help reduce pollution;
 - 33% disagreed that the seven actions proposed in order of priority were appropriate and
 - 23% responded "I don't know",
- 1.9. The results of the consultation revealed that the proposed measures are generally acceptable and in overall agreement with that of the internal stakeholder consultation carried out prior. The consensus was that a combination of complementary initiatives is key to creating a positive impact in both the short and longer-term on-air quality in Haringey.
- 1.10. As emission from traffic is considered the main source of pollution in Haringey, initiatives with evidence of positive impacts on air quality in the short term such as traffic reducing interventions including charging for parking and enforcement, infrastructures and traffic management should be given priority. Pedestrianisation, road closures, temporary and permanent car free days as well as green infrastructure were particularly recommended as priority measures by most respondents. The consensus among the consultees was that good public transport coverage, good cycle and walking infrastructure, links to discouraging private use of petrol and diesel fuelled cars and encouraging alternative forms of transport could help resident and businesses improve air quality.

- 1.11. Better transport planning as well as a communications strategy with associated materials to build public awareness on air pollution was considered necessary to deal with pollution. In the longer term, behavioural change strategies to move people away from car use were considered warranted.
- 1.12. As with all London Borough Councils, vehicle idling was the most discussed problem. Stricter enforcement measures were recommended around schools and other vulnerable receptors.
- 1.13. Air pollution monitoring and audits were recommended at each school within Haringey.
- 1.14. Changing parking policies by increasing parking charges in line with the surrounding boroughs was suggested as source of additional revenue and to help reduce transboundary diesel car pollution.
- 1.15. More bold and ambitious actions with specific targets by Haringey Council will be welcomed by the residents. Further details of the consultation responses and proposed actions from Haringey Council are presented in the following sections.

2. Consultation Methods and Responses

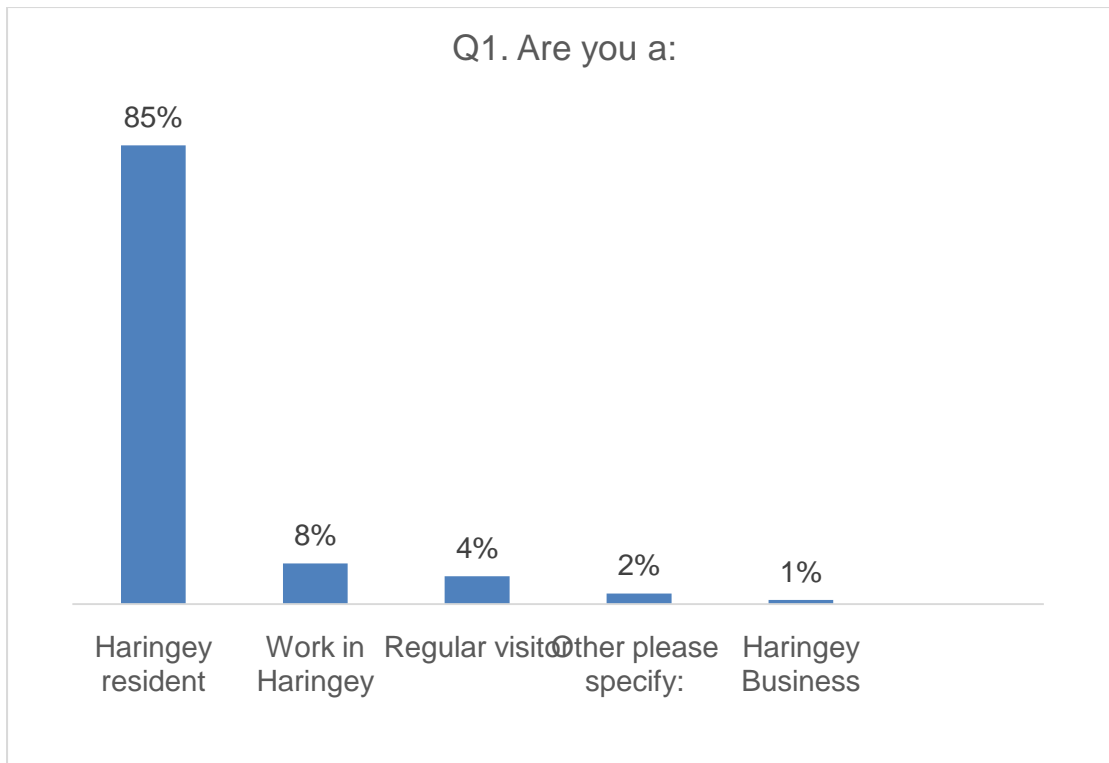
2.1. The methodology used for the consultation was presented in the communication and engagement plan in May 2019. Emails, questionnaires and face to face interviews during public workshops for example were used to gather the data.

- Responses to the consultation came from a range of external stakeholders and interested parties.
- In total 253 responses were received from external stakeholders, with only 2 from businesses exclusively. The following sections and Table 1 present the results of the consultation and responses from the questionnaire.
- Ten consultation responses were received from statutory stakeholders as summarised in Table 2.

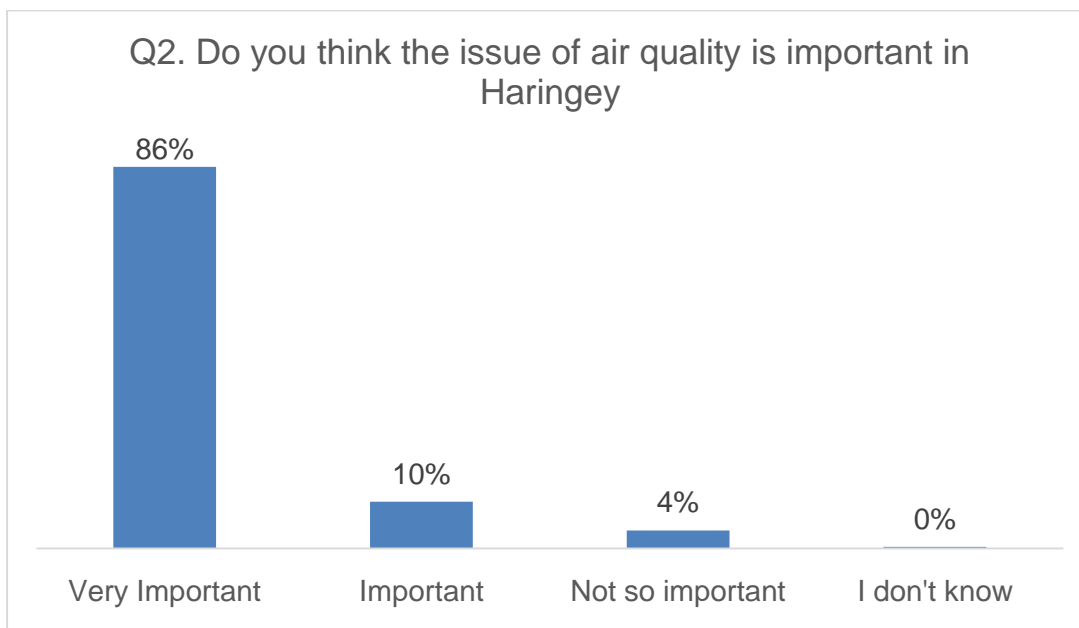
2.2. A summary of the responses to the questions are as follows:

Q1: Are you a:

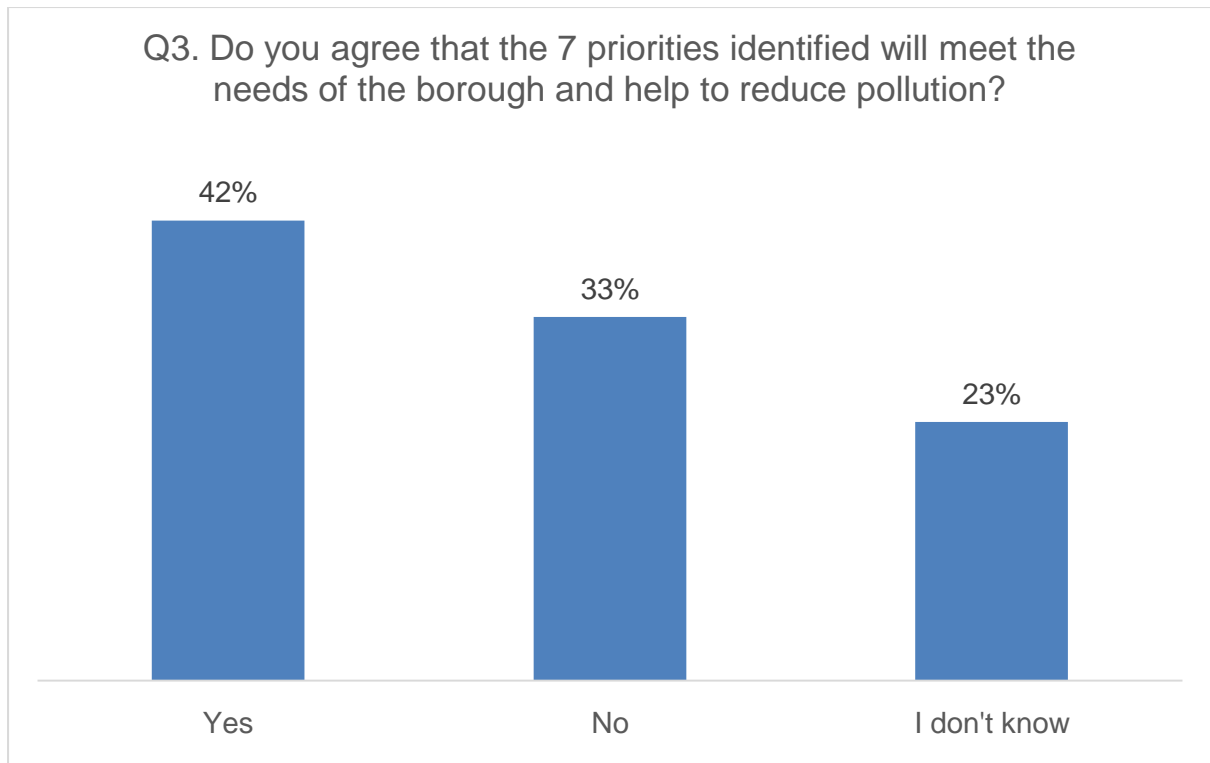
- Haringey resident
- Work in Haringey
- Regular visitor
- Other please specify:
- Haringey Business



Q2: Do you think the issue of air quality is important in Haringey?



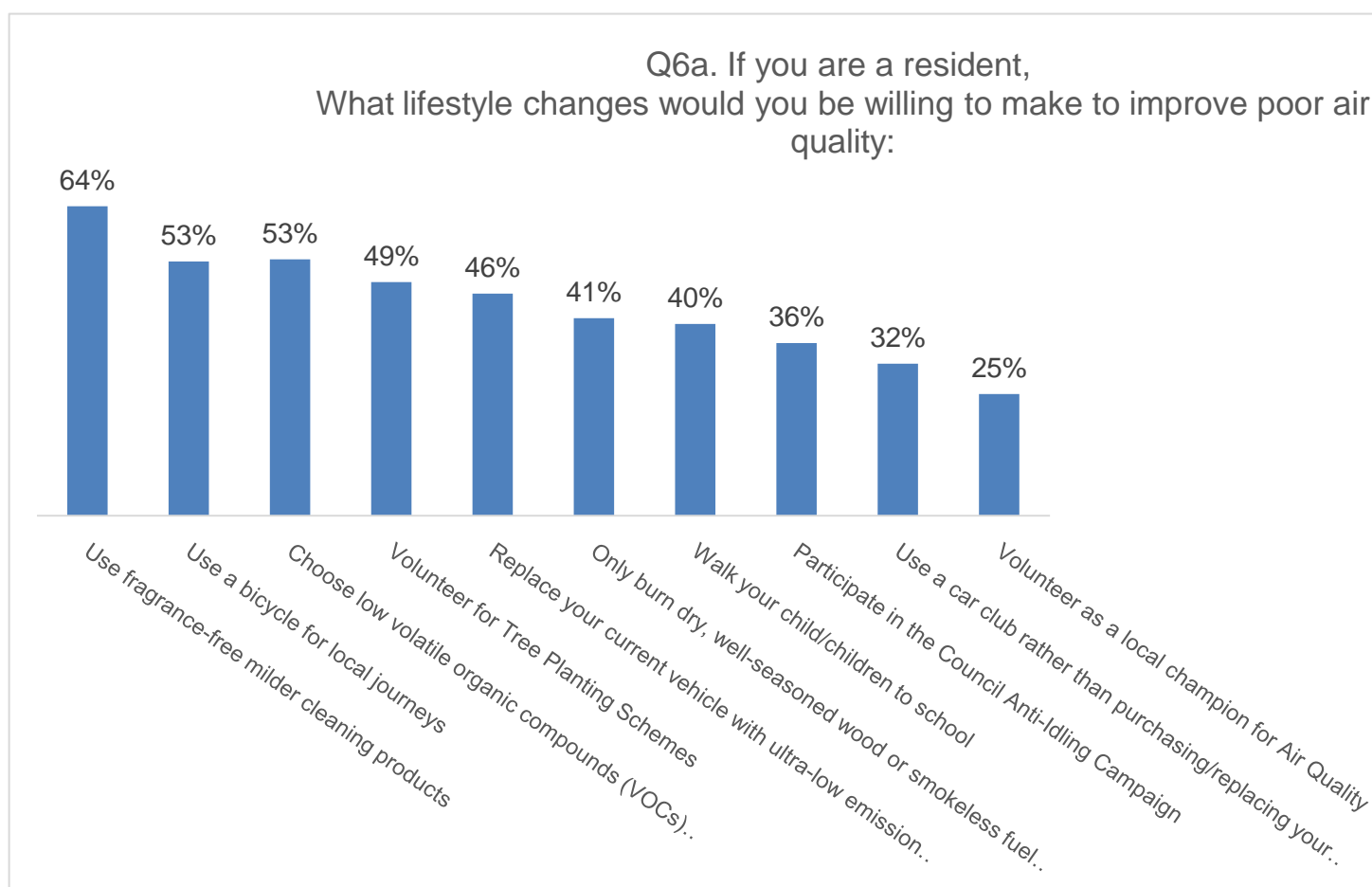
Q3: Do you agree that the 7 priorities identified will meet the needs of the borough and help to reduce pollution?



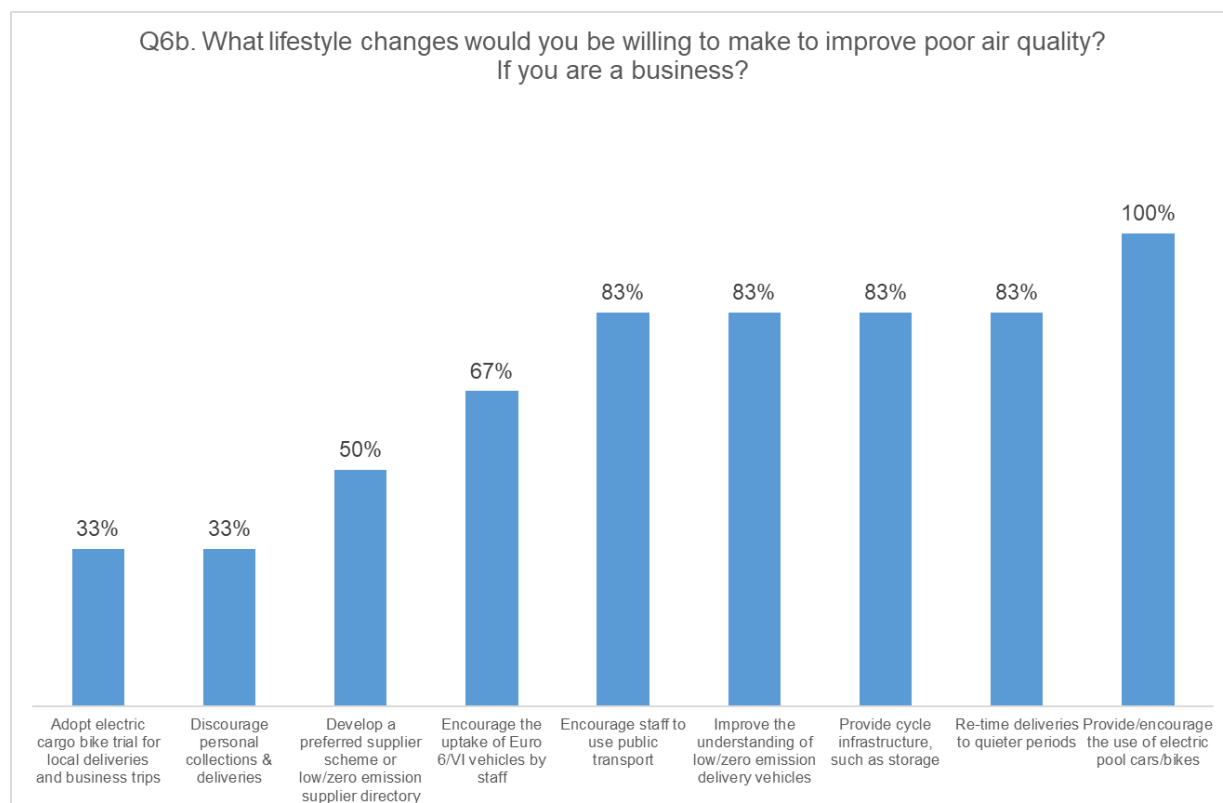
Q4. - If not, what other actions/measures, would you suggest**Q5. How might we improve the draft Air Quality Action Plan overall?**

The qualitative responses are summarised in Table 1 and include the following recommendations:

- Good cycling and walking infrastructure and public transport are necessary to create a behavioural shift away from private car use across Haringey.
- Increasing electric vehicle/bikes/scooters numbers have the potential to significantly reduce certain pollution emissions. Financial incentives, such as subsidies, can be effective in encouraging electric vehicle uptake.
- Suitable roadside barriers and street improvement may be a simple means of improving air quality.
- Low speed limits can have a prompt impact on air quality near roads, primarily through reducing the stop-start nature of the traffic flow.

Q6a: What lifestyle changes would you be willing to make to improve poor air quality? If you were a resident:**Q6b. What lifestyle changes would you be willing to make to improve poor air quality? If you are a business:**

Six respondents answered the questionnaire as follows:



Only 2 of the 6 respondents identified themselves as businesses. The other four respondent also completed question 6a that was specially designed for residents.

Q7. What can Haringey Council do to help you make these changes?

- Provision of better and safe cycling and walking infrastructure. Extend walking opportunities away from main, polluted roads, e.g. link the Haringey passage to Finsbury Park, extend the pathway alongside the New River
- Provide secure, monitored cycle parking at all the borough's underground stations
- Enable easier charging for electric vehicles, by either providing a network of points outside domestic properties, or by finding a means of allowing residents to run cables from their properties to their vehicles
- Stricter penalties for polluting activities: idling, wood-burning stoves etc
- Replace speed humps with less polluting alternative traffic-calming measures Basically, more carrot and stick
- Provide residents with trees to plant & designate areas where they can be planted.
- Provision, improvement and protection of green infrastructure to protect biodiversity and improve mental health wellbeing amongst residents.
- Give more support to the arboriculture officer plus his staff with tree planting plus greening of the borough plus its valuable open spaces plus parks. A vital plus enormously important step towards better air quality plus health.
- Bring in laws to impose heavier fines for polluters & ban the most polluting vehicles from our roads.
- Pedestrianised more areas especially near shopping streets & schools & community buildings where people walk & cannot avoid breathing in the current dangerous air; Pedestrian crossing over Turnpike Lane top of the passage

- Cargo bikes for hire and cheaper public transport for all
- Help homes for Haringey get solar panels on social housing. Very unfair that private house owned got grants for this whilst those at the bottom of society- and the poorest have been left out of the equation, replace gas boiler as soon as possible.
- Car replacement will make us lose money by selling up LEZ Cars.
- Setup schemes to encourage residents to reach their objectives
- Encourage children to walk to school
- Include clear yearly targets within the plan and focus on measures that work.
- Deal with waste management issues including cleaning the street.
- Deal with other sources of pollution including aircraft and smoke pollution from restaurants
- Financial incentives for modal shift and invest on more recycling projects
- Put pressure on the company who run Haringey mainline rail station to improve access
- Subsidise alternatives or make alternatives more attractive e.g. safer cycling routes and lanes;
- Subsidise car clubs so they are more attractive /have better daily rates and are located close to homes (important for families with car seats)
- Subsidise home improvement leading to reducing of emissions
- Get involved with community events

3. Equal Opportunities Monitoring form

3.1. The following findings show that people age between 30-44 were the most interest in air quality:

- 0% <24
- 5% 24-29
- 40% 30-44
- 30% 45-59
- 7% 60-64
- 12% 65-74
- 2% 75-84
- 1% 85 -94
- 2% did not provide an answering to this question

3.2. Response were from a variety of people including:

- 4% Deafness or partial loss of hearing
- 0% Developmental disorder
- 2% Mental ill health
- 2% Physical disability
- 2% Other disability
- 1% Learning disabilities
- 4% Long term illness or condition
- 46% No disabilities
- 39% did not provide an answer to this question

3.3. Most questions in the Equal Opportunities Monitoring Form were not completed.

4. Conclusion and next stage

4.1. The AQAP has been amended to include any feasible recommendations made during the consultation. The main changes are:

- Inclusion of the Schools Street Action Plan, which is to be completed by March 2020. The Action Plan will look into the possibility of more school streets, road closures and enforcement action in order to improve air quality around schools.
 - Supply air monitoring data to Kings College so that Haringey's air quality can be shown on the London Air Network website, as well as on the Defra Arun website.
 - Consideration of more air quality monitoring sites throughout Haringey.
- 4.2. The Plan will be formally adopted by the Council and will be overseen by the Air Quality Steering Group. The Group will sit every quarter and review the progress of each action.
- 4.3. Many of the actions have funding and resources allocated to them. However, some have limited resources attached and may need input from third party organisation. Haringey will actively pursue alternative sources of funding to implement the actions recommended.
- 4.4. The Annual Status Reports published on the Council's webpage are produced as part of the Council's statutory local air quality management duties. The Report will include an update on the action plan measures as well as the latest air quality data.
- 4.5. The following documents should be read in conjunction with this consultation response for completeness.
- London Borough of Haringey Air Quality Annual Status Report for 2018 available at <https://www.haringey.gov.uk/sites/haringeygovuk/files/air-quality-report-2018.pdf>
 - Parks and Open Spaces Strategy available at <https://www.haringey.gov.uk/libraries-sport-and-leisure/parks-and-open-spaces/open-space-strategy>
 - Haringey's Transport Strategy available at <https://www.haringey.gov.uk/local-democracy/have-your-say-haringey/haringeys-transport-strategy-2018-consultation>
 - Low Emission Vehicle Strategy available at https://www.haringey.gov.uk/sites/haringeygovuk/files/draft_ultra_low_emission_vehicle_action_plan_-_full_document.pdf
 - Crouch End Liveable Neighbourhoods Project available at <https://www.haringey.gov.uk/parking-roads-and-travel/roads-and-streets/public-realm-improvements/liveable-crouch-end>
 - Local Plan: Development Management DPD available at <https://www.haringey.gov.uk/planning-and-building-control/planning/planning-policy/local-plan/local-plan-development-management-dpd>
- 4.6. The following documents are still under development:
- School Street Action Plan (due in March 2020)
 - Parking Permits Strategy (Ongoing)
 - Transport Strategy March 2018
 - Transport Policy Statement (Ongoing)

Table 1 Air Quality Action Plan 2019-24 Table of Measures and comments received

Schedule 11 of the Environment Act 1995 requires the Council to consider any representations made in accordance with the consultation. Responses to the consultation came from a range of stakeholders and interested parties. The themes have been ranked by order of priority of the seven broad actions that were proposed to reduce air pollution in Haringey.

Seven broad priority actions: 1. Air Quality Monitoring and other core statutory duties 2. Emissions from developments and buildings 3. Public health and awareness raising				4. Delivery servicing and freight 5. Borough fleet action 6. Localised solutions 7. Cleaner transport	
Action category	Action ID	Action name and description	Summary of theme and comments received	Council's consideration/Response	Impact or Change
Monitoring and other core statutory duties	1	a) With the support of all relevant teams, monitoring to include maintaining the borough's two automatic and 13 NO _x diffusion tube monitors across the borough and expand monitoring networks, especially around school.	<p>The comments about monitoring from the consultation are as follows;</p> <ul style="list-style-type: none"> Air Quality monitors should be installed in each school playgrounds. There is need for an additional monitor on Green Lanes to the south of the existing one which under-records the levels in the busier and more frequented section of the road more monitoring to capture seasonal variations of air quality to include the worst-case scenario during in winter air pollution measurement of different vehicles so that people know how polluting their own vehicle is it is necessary to communicate monitoring effectively by making the data to residents in a visual way effectively monitoring and reducing emissions from demolition and construction sites is considered warranted monitoring of emissions from restaurants include CO₂ and PMs monitoring on the plan submission of monitoring data to Kings College for the LAQN as well as DEFRA's network to make available detailed map of the air quality across Haringey and London Monitoring to assess the impact of GLA's low emission zones e.g. Wood Green and Tottenham High Road/Seven Sisters where only cleaner buses are being deployed Co-operation between Haringey and the GLA Breathe London programme and the Kings College London 'toxic air supersite' in Honour Oak which will provide a better breakdown of the origins of pollutants e.g. Polish industry, distant farmlands. Haringey should track Government research listed in Clean Air Strategy 2019 into emissions, for instance from brakes and tyres (i.e. resuspension) to be able to inform residents better. Defra has commissioned the University of Plymouth to understand the air quality implications. Publicly signal pollution levels in hotspot areas It was recognised that monitoring data remain rudimentary and that monitoring is a good way to focus efforts and to track improvement, but this should not be the main thrust of the strategy. 	<p>The comments made with reference to monitoring have been noted and the plan will be modified. Implementation of some of the additional measures will be subject to the availability of funding.</p> <p>Monitoring of air pollution levels within different vehicles and monitoring to assess the impact of GLA's low emission zones e.g. Wood Green and Tottenham High Road/Seven Sisters where only cleaner buses are being deployed are outside the scope of this AQAP.</p> <p>Haringey Council intend to continue looking for alternative sources of funding to implement most of the measures recommended.</p>	Accepted and change.
	2	a) Investigate the potential for larger development areas to proactively assess air quality impacts	<p>Comments received about this action are as follows:</p> <ol style="list-style-type: none"> It was reiterated that there should be a requirement for all new developments to provide green space equivalent to 15% of the footprint of the development itself, through the use of roof gardens, terrace gardens, and green walls. Plant more pollution-absorbing street trees. These should be car free; Comments were made that it was unclear how significant and effective the measures will have, given the large contribution from high volumes of traffic in the borough, concentrated in certain localities, and which will continue to increase as a result of the extensive housing developments which are planned. 	<ol style="list-style-type: none"> The requirement for green infrastructure is already considered in Haringey's planning strategy. Haringey has a Transport Strategy which presents our vision on traffic within the borough. A Transport Policy Statement is also due for publication. 	No Change.

Seven broad priority actions:				4. <i>Delivery servicing and freight</i> 5. <i>Borough fleet action</i> 6. <i>Localised solutions</i> 7. <i>Cleaner transport</i>	
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		cumulatively	3. The LA should be planning for net zero emissions on all construction works within the borough 4. Lorry movements to and from building sites could be reduced if developers are pressed to do so. Measures to promote and support this could be included in part of the strategy. 5. Producing guidance by end of 2021 seems under-ambitious <ul style="list-style-type: none"> 2(a) 'Ensure that air quality assessment is dealt with adequately in planning applications' is inadequate. Planners should be trained and assessed on their understanding of potential air quality (and min CO₂) opportunities for new developments (more specific than at 5). Zero carbon offset should only be agreed where trained Planners concur that both max air quality and min CO₂ is incorporated in the design. 	3. Like most London Boroughs, Haringey Council is working toward zero emissions from all construction works. 4. As above 5. The Planning Dept consults with the Air Quality Officer and the Carbon Management Team at the design stage.	
		b) Ensuring emissions from demolition and construction are minimised	The Council and GLA – should press for zero-emissions equipment to be used on sites as soon as possible. This should include pumps and smaller plant running on metered mains electricity from adjacent sites where feasible. 2 (b) <i>'London Construction Programme (LCP) project for new pan London.... air quality to be a consideration....' and 'Continue to ensure that construction related complaints (>10 units) are referred for enforcement' are both inadequate.</i> All construction sites in Haringey to have clear signs saying what has been agreed re Air Quality and a hot line to report contraventions, as many people may be affected and not be aware, or not know where to complain to. 'increase inspection'(at3) could be conducted by volunteers if Haringey has insufficient staff.	1. Like most London Boroughs, Haringey Council is working toward zero emissions from all construction equipment. 2. All developments are required to comply with Policy 7.14 of the London Plan and the GLA SPG Sustainable Design and Construction. 3. There are important upcoming changes to the NRMM requirements for engines of 37kW-560kW on sites in London in general. There is also a target for zero emissions from construction machinery throughout London by 2040. 4. Construction Management plan, Logistic management Plan and Air Quality management plan are a requirement for major developments in Haringey to address issues that may arise as results of construction/demolition activities including environmental pollution and air quality.	No Change.
	3	Ensuring enforcement of non-road mobile machinery (NRMM) air	1. A suggestion was made that enforcement of NRMM standards should include penalties for non-compliance. 2. The Council should press developers to use Stage V generators (including Hydrogen fuel-cell powered) as soon as possible.	1. To protect local air quality and comply with Policy 7.14 of the London Plan and the GLA NRMM LEZ all major developments are required to meet the NRMM requirement. 2. From 1 st January 2020, all constant-speed	No change.

Seven broad priority actions: 1. Air Quality Monitoring and other core statutory duties 2. Emissions from developments and buildings 3. Public health and awareness raising				4. Delivery servicing and freight 5. Borough fleet action 6. Localised solutions 7. Cleaner transport	
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		quality policies		engines. e.g. generators will be required to meet EC Emissions Stage V. 3. Enforcement is being considered as part of wider London NRMM scheme.	
	4	Reducing emissions from CHP. Enforcing CHP air quality policy. Ensure smaller developments use ultra-low NO _x Boilers.	The Council should press for the replacement of existing fossil fuel combustion-based CHP engines as soon as possible.	1. This measure is already being implemented a part of the wider planning strategy and enable development to comply with Policy 7.14 of the London Plan and the GLA SPG Sustainable Design and Construction. 2. Our Carbon Management Strategy is also available at https://www.haringey.gov.uk/environment-and-waste/going-green/reducing-co2-emissions .	No change.
	6	Ensuring adequate, appropriate, and well-located green space and infrastructure is included in new and existing developments.	1. Greening should include major support for community growing projects including where these benefit groups with needs e.g. mental health/ refugee/ elderly/ vulnerable young 2. The LA should aim at least double the number of trees in Haringey, to absorb CO ₂ as well as improving air quality. This will probably mean strengthening the policies in DPD DM20 to achieve this.	1. This comment has been noted. 2. This measure is already being considered as part of the wider planning strategy and the ongoing Parks and Open Spaces Strategy.	No change.
	7	a) Declaring Smoke Control Zones and ensuring they are fully promoted	The consensus was that Point 7 is too vague and aspirational: some of the comments made include for example more control and regulation on restaurant, waste activities and the burning of appropriate fuel as follows: 1. Emission from restaurants (raised on several occasions) including smoke from meat-grilling establishments (Nando's, Chicken shops, Turkish restaurants, etc - the area around Wood Green Station and the library, green lanes. It was suggested that this measure needs to include wood smoke from restaurants	1. Haringey Council recognise that emission from restaurants can be a major problem and this source of pollution was reported in the GLA 2018 Annual summary report available on the website. Haringey has a strategy for dealing with smoke from restaurants. Enforcement Action is taken where standard operating procedures are not being met or adhered to.	1. No Change

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		and enforced. To include: an awareness campaign, engagement with suppliers, and active enforcement.	2. Prohibit the use of unauthorised equipment including limiting the sale of wood for stove burning and charcoal for barbecues in local shops. Prohibiting the Domestic wood burning, Research and stricter rules with restaurant business fume extraction. Fumes & fatty deposits are pumped out in the densely populated areas from Harringay Green Lanes in the Ladder and Gardens Streets. restaurants using dodgy coal / bad chimney vents which pollute the atmosphere also, smoke is everywhere from businesses in Green Lanes to wood burning stoves and people burning rubbish in their gardens. Barbecues need to be stopped in parks. 3. A concern about emission from waste incinerator which is located near the IKEA (Enfield) causes lots of air pollution, which is then dispersed to Haringey borough. Emission from recycling bin, the recycling bin collected by lorry coming from all over UK. 4. Strict ban on bonfires and wood burners e.g. Finsbury Park is not pleasant on hot days and fire is a hazard. This is all serious pollution. Better controls over domestic fires and bonfires and Stop residents burning plastic.	2. "Section 18 of the Clean Air Act 1993" declare that all buildings and industrial or trade premises within London Borough of Haringey (LBH) are subject to Smoke Control Orders. Haringey is a smoke control area where only authorised fuel using 'exempt appliances as defined by DEFRA are permitted 3. We will continue to raise awareness and enforce this regulation. 4. As above.	
		b) Ensuring that Smoke Control Areas are appropriately identified and fully promoted and enforced.	1. There is a local problem in Haringey/St Ann's due to smoke/fumes from a high concentration of charcoal grills in restaurants in Green Lanes, but it's not clear if a Smoke Control Zone would help. 2. Any zone needs the availability of staff to respond quickly at any time to complaints by monitoring and enforcement and also do frequent spot checks otherwise it is useless. 3. Gardeners and allotment-holders have bonfires to deal with weeds and grass that if composted locally would not destroy seeds. Can there be provision – on allotments at least – for drying facilities and efficient burners that would reduce smoke from bonfires?	1. Enforcing Smoke Control Zone will reduce the use of unauthorised equipment and fuel, therefore reducing air pollution 2. Haringey Council will continue to improve it services where as necessary. 3. Provision of drying facilities and efficient burners cannot be currently guaranteed by Haringey Council. However, this comment has been noted and will be given further considerations.	No change.
	8	Promoting and delivering energy efficiency and energy supply retrofitting projects in workplaces and homes	Comments include: 1. Create incentives (e.g. lower council tax) for non-carbon fuel generation at home: solar, wind turbine etc 2. Phase outgas use in council-owned properties in favour of electricity/renewable sources, insist developers fit electric water boilers 3. Encourage residents to use only renewable energy suppliers for gas and electricity 4. Solar panels on social council and school buildings 5. Building owner retrofit could include greater incentives e.g. one-stop shop teams (advice and full implementation) also as local employment initiative. This is key and needs to be properly funded. 6. <u>Existing buildings – Haringey Homes</u>	1. The Council does not have the power to do this currently. 2. Electrical heating is often more expensive to operate than cleaner gas. This may then put the occupier at greater risk from Fuel Poverty. Communal heating systems are often cheaper and less emitting than individual gas boilers. 3. The Council will continue to promote green energy suppliers alongside	No change

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		<p>through EFL retrofit programmes such as RE: FIT, RE: NEW and through borough carbon offset funds.</p> <p>to replace old boilers/top-up lost insulation in combination with other energy conservation measures.</p>	<p>a. Boilers – figs 8, 9a and 9b show how bad the NOx, PM10 and PM2.5 pollution is from domestic gas and boilers across the whole of Haringey, so therefore the pollution is much more dangerous in each specific home with an old boiler. 'Review procurement policy regarding replacement boilers' (at 8) is inadequate.</p> <p>b. As well as making sure that residents are aware of the dangers Haringey needs to raise sufficient funds to replace old boilers in Haringey's own homes, as RE: FIT, RE: NEW and carbon offset funds are likely to be insufficient.</p> <p>7. <u>Existing buildings - owner occupied</u> Typically, owners of old boilers are unaware of the health risks, so have no trigger to replace them with low emission/low carbon ones – or to explore zero carbon alternatives, such as heat pumps and solar thermal how water.</p> <p>a. Haringey needs to make sure that this sector is aware of the dangers (and opportunities for a healthier home and lower bills) e.g. expand the offer of the Parity Projects refurbishment, with an affordable repayment plan.</p> <p>8. Open fires – Investigation of 'complaints of dark smoke' within 5 working days (7) is insufficient, as the contravention will have ceased by then.</p> <p>a. There needs to be a streamlined process for members of the public to report contraventions for immediate action – using volunteers if Haringey has insufficient staff.</p> <p>9. <u>Existing buildings - private rented</u> a. Typically, renters are not in a position to ask for cleaner boilers, and the legislation on EPC levels for new lets are inadequate. Haringey needs focussed carrots and sticks to make improvements in this sector.</p> <p>10. Haringey is obliged to administer the Domestic Private Rented Property Minimum Standard for domestic rented properties to get them to an E (unless the landlord has registered an exemption), which effectively allows landlords to continue with old boilers and the need for wasted heat. Haringey is also proposing licensing for landlords of Private Sector Properties to be presented to the Council in October 2019, covering Houses of Multiple Occupation (HMO) and non-HMO rentals.</p> <p>11. Enforce a requirement to licence, with a condition that old boilers are replaced, and adequate insulation avoids energy waste, before renting.</p> <p>12. The resident would welcome further Liveable Neighbourhood schemes with filtered side roads. Tree and shrub planting can absorb particulates from roads. This could be achieved through initiatives such as the 'Parklet' scheme employed by Hackney Council, or the formal support of community street planting - which is currently sometimes removed without warning to those supporting it.</p> <p>13. The necessity for grid upgrades in cooperation with other boroughs on better public transport networks was very urgent because the electric grid imposes constraints for (fast) charging.</p>	<p>switching suppliers to residents.</p> <p>4. The Council already has 0.5MW of Solar Panels on its social housing and schools. We are reviewing the number of installations and seeing if we can increase this based on business cases.</p> <p>5. The council uses Pan London organisations such as Retrofit Works / Parity Projects to aid the occupier install carbon reduction and air quality measures. This is a one stop service and has links to local employment.</p> <p>6. Funding schemes typically have specific criteria with respect to both eligibility of households and the type of intervention offered. Through Haringey's Affordable Energy Strategy, we have committed to using a carrot and stick approach within the private rented sector. We aim to try and seek grant funding, revise minimum property standards and utilise enforcement and licencing conditions to stimulate property upgrades. All of which should provide a positive contribution towards achieving or Carbon Management goals.</p> <p>7. As above</p> <p>8. As above</p> <p>9. As above</p> <p>10. As above</p> <p>11. As above</p> <p>12. Haringey Council is working up bids on these types of schemes to try and deliver with TfL</p> <p>13. Our charging point suppliers ensure there is enough electricity supply to accommodate charging, from slow to rapid. We will work with UK Power Networks to ensure we have adequate supply in future years</p>	

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			<p>14. Reducing the number of vehicles in the borough fleet, replacing the most polluting with hydrogen, electric, hybrid, biomethane and other cleaner vehicles when no other options remain. This action is very unambitious, suggesting that it is not possible to reduce the overall number of fleet vehicles. Business as usual with cleaner vehicles is not ambitious. On outputs, rather than committing to: 'Review staff travel payments to incentivise use of cleaner vehicles and minimise mileage', there should be a clear commitment to incentivise walking and cycling for work purposes over motorised transport.</p> <p>15. Investigate partnerships with electric vehicle fleets (e.g. Zipcar, E-Car) to increase the number of easy access vehicles across the borough.</p> <p>16. Much greater disincentives for internal combustion engine vehicles.</p> <p>17. Changing the Source London electric charging points to a more affordable option would help drive people to electric vehicles.</p> <p>18. Investigate charging points across the borough potentially linking with households with solar panels - fitting battery charging points for free in return for % of energy produced e.g. x hours per week but no other financial incentives.</p> <p>19. The ultra-low emission zone should also be extended, with immediate effect.</p> <p>20. ensuring that the drive to install charging infrastructure for ULEV vehicles for residents and commercial vehicles such as taxis continues.</p> <p>21. The move to electric cars will help but will take some time to have a significant effect, and delivery and other commercial vehicles will lag behind and seem likely to continue to increase in numbers due to internet shopping. More traffic jams are to be expected and electric vehicles continue to produce particulates from their tyres/brakes.</p> <p>22. The ULEZ discriminates against poorer people - much more needs to be done to provide them, as well as everyone else, with alternatives. There is no mention of public transport at all in the Action Plan - this is certainly not the primary responsibility of Haringey Council, but negotiation with TfL must be a priority.</p> <p>23. EV chargers must not be installed on the pavement or in ways that block potential cycle routes as was done in the first tranche of on-street EV chargers in Haringey. Installations should focus on off-street parking areas for shared vehicles (i.e. car clubs).</p>	<p>14. The Council is proactive with minimising, and electrifying, the Council fleet. This is being done through various means, such as the use of Clean Car's GPS technology to undertake a fleet review. The fleet review identifies which electric vehicle models are suitable, lifecycle costs and potential emissions saved. When lease contracts are up, an electric vehicle will be the preferred option if there is a suitable model available and it is economically viable. Various Council fleets are also trialling an electric van.</p> <p>15. Zipcar is available in the borough and other car club services will be introduced to the borough. Car clubs must demonstrate that a percentage of their fleet are electric. This percentage should increase overtime.</p> <p>16. Under the Council's parking and permit charges, combustion engine vehicles pay higher fees due to their tailpipe emissions. This mechanism is due to be reviewed.</p> <p>17. The Council recognise the need for competition in charging point providers. Through the Go Ultra Low City Scheme, the Council are introducing Chargemaster free standing charging points and Char.gy lamp column charging points. Whilst Source London are relatively more expensive than other charging point providers, they offer a unique deal to the Council in that they reimburse for lost parking revenue. This money is ring-fenced for the Council's Medium-Term Financial Strategy (MTFS), which funds the Council's services.</p> <p>18. The Council will investigate this.</p> <p>19. This is outside of the Council's remit. The</p>	

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				<p>Ultra-Low Emission Zone is led by the Mayor of London.</p> <p>20. The Council have an ambitious draft Ultra-Low Emission Vehicle Action Plan, which outlines the Council's charging point roll out for different user groups, including residents, businesses and taxis.</p> <p>21. The Council note that electric vehicles do not alleviate congestion or all air pollution. However, they provide a good option to those who require a vehicle. The Council's priority is to promote modal shift to active transport (cycling and walking) and public transport. This is reflected in Haringey's Transport Strategy (2018). Furthermore, other initiatives such as car clubs can reduce vehicle numbers.</p> <p>22. The Council agree that the ULEZ disproportionately affects the most vulnerable in the borough. Ensuring there are electric car clubs, for example, is one way to ensure that everyone has access to clean and affordable vehicle options. Public transport is captured in Haringey's Transport Strategy (2018).</p> <p>23. The Council agree with this and have devised a hierarchy to install slow and fast charging points: i) on a build-out in the road; ii) retrofitting street furniture (e.g. lamp columns); iii) on the pavement where 2 metres width remains and when there is significant benefit of the charging point being there. For rapid chargers, the hierarchy is as follows: i) off-street locations (e.g. car parks); ii) on a build-out in the road; iii) on the pavement where there 2 metres width remains and when there is significant benefit of the charging point being there.</p>	

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	9	Master planning and redevelopment areas aligned with Air Quality Positive and Healthy Streets approaches	No comments made		
Public health and awareness raising	10	a) Public Health department taking shared responsibility for borough air quality issues and implementation of Air Quality Action Plans. Public Health Teams should be supporting engagement with local stakeholders (businesses, schools, community groups and healthcare providers). They should be asked for	1. Although the consensus was that good communication, publicity/promotion, education and advertisement should help raise awareness about pollution issues there was a suggestion from one respondent that promotion has very little impact on air pollution as opposed to processes and infrastructures that would be more effective. The LA should be more specific on the actions and upstream downstream actions designed to enhance clean transport. Invite the general public to co-design actions (like Climate CIC climathon in several cities). 2. A public health campaign was recommended. 3. It was recognised that a stronger emphasis should be put on public awareness with more specific points (e.g. the issue of idling needs to be tackled) because people are just not aware that they shouldn't do it. Other actions were as follows: <ul style="list-style-type: none"> • Focus should be put on young people's education so that they can put pressure to their parents to change behaviour. • Ensure that streets are safer so people will walk more by increasing police presence; providing places for young people to go to. Stop people drinking on the high road/outside pubs/gambling establishments to improve the feel of the area making it a more pleasant place to walk. • Plant more trees to capture carbon and to make the area look nicer and more inspiring to be in Inform children to stand back from the road edge thus reducing their own exposure. • Connecting info on using cars in a responsible way with the process of administering the vouchers on a residents' and visitors' parking scheme. • Information to Haringey resident's car owners that 'cars should not be used it in an anti-social way. • Idling campaign • A meaningful summary of the action plan should be made available on, the Council's website and available as a poster for community noticeboards • More public engagement events, perhaps asking school and college students to lead on devising their structure and material. • Engaging and consulting with communities, shops/traders, residents. Empowering these communities so that they are open and ready for this change. Having big fun events that promote car sharing, cycling etc 	1. Haringey is putting put more emphasis on education and promotion to raise awareness and change behaviours. 2. The superzone project tackles some of the social issues affecting the most polluted schools in Tottenham. 3. All comments made have been forwarded to public health for consideration and action as required.	No Change

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		their support via the DPH when projects are being developed.	<ul style="list-style-type: none"> Get some views and suggestions from Haringey residents and come to an agreement to a solution Public education of AQAP to help dissuade advise motorists of what upgrades are available. Statutory bodies staff to set the example by stop using cars but buses and wheeled vehicles only. Ban essential car use concept education programme including booklets and videos in health hazards should be designed- leaflets Haringey should 'require an audit of every school to identify measures to make sure the air is safe – including appropriate green measures, e.g. using the Mayor's toolkit as completed for Holy Trinity CofE and Lordship Lane. Newham are installing monitors at every school and Haringey must do the same. Haringey should apply for the Mayors Green Fund for the measures being applied, such as Green walls to absorb pollution. 		
		Directors of Public Health (DsPH) fully briefed on the scale of the problem in your local authority area; what is being done, and what is needed. A briefing should be provided	No comments made		
		b) Direct ors of Public Health to have responsibility for ensuring their Joint Strategic Needs Assessment (JSNA) has up to date information	No comments made		

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		on air quality impacts on the population			
		c) Strengthening co-ordination with Public Health by ensuring that at least one public health specialist within the borough has air quality responsibilities outlined in their job profile	No comments made		
		d) Direct or of Public Health to sign off Statutory Annual Status Reports and all new Air Quality Action Plans	No comments made		
	11	Engagement with	The resident would welcome further Liveable Neighbourhood schemes with filtered side roads. Tree and shrub planting can absorb particulates from roads. This could be achieved through initiatives	Other Liveable Neighbourhood schemes are being considered to the east of the borough.	No change.

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		businesses as part of the 'Liveable Neighbourhoods' project in Crouch End	such as the 'Parklet' scheme employed by Hackney Council, or the formal support of community street planting - which is currently sometimes removed without warning to those supporting it.		
	12	Supporting Air text, promotion and dissemination of high pollution alert services.	No comments made		
	13	Encourage schools to join the TfL STARS accredited travel planning programme	No comments made		
	14	Air quality in and around schools	<p>A consensus was the AQAP failed to put more emphasis on protecting and improving public health, and in particular of reducing children's exposure to harmful NO₂ and PMs. Tackling Idling across the borough and around schools especially was the main subject of discussion. Suggestion include:</p> <ol style="list-style-type: none"> 1. Getting bus drivers to switch off engines at stands e.g. Tottenham lane. 2. penalised for parking on double yellow lines to wait for their children 3. enforce and fine drivers for vehicle idling around schools 4. education and campaign again idling 5. Cars use Alexandra Park road as a rat run from the north circular and the road is jammed with North Circular traffic at busy times. This massively increases the pollution at Rhodes Avenue Primary School and all the children walking to school. therefore, High polluting cars should be made to stay on the North Circular. 6. Reduce cars and emissions near playgrounds. 7. Introduce Low Traffic Neighbourhoods all over the borough especially around schools and decrease the amount of road traffic that passes through Haringey. 8. Given the strong emphasis on schools and protecting schoolchildren there should be a commitment to explaining to parents and the local community what they can do to make 	<ol style="list-style-type: none"> 1. As part of the London wide idling program funded by the Mayor, Haringey Council will be taking enforcement action and encouraging behaviour change to tackle idling. 2. Double yellow lines are enforced by CEO's 3. See 1 above 4. See 1 above 5. A School Street Action plan is also due for publication in 2020 and will address some of the measure necessary to tackle air pollution around schools. 6. See 5 above 7. Haringey has a Transport Strategy which presents our vision on traffic within the borough. A Transport Policy Statement is 	No change

Seven broad priority actions:				4. <i>Delivery servicing and freight</i> 5. <i>Borough fleet action</i> 6. <i>Localised solutions</i> 7. <i>Cleaner transport</i>	
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			<p>their children safer, and what the Council is doing to achieve this. Examples for parents are making use of walking zones for travelling to school, supporting their school in joining the TfL STARS scheme, and supporting road closures around schools. There should also be mention of trialling green infrastructure such as hedge installation to protect schools on busy main roads, and tree planting on main roads themselves</p> <p>9. Schools need pollution screens as children are being exposed to high levels of pollution and Haringey has a duty of care to ensure children are learning in a safe environment!</p> <p>10. Spot people and vulnerable people being exposed to secondary smoking, and secondary toxic gas from vehicles.</p> <p>11. To include air filter systems in schools so the children aren't breathing in polluted air all day</p> <p>12. Encourage parents to walk or cycle their children to school instead of driving them by car</p> <p>13. Investigate the petrol station being so close to Rokesly school.</p> <p>14. Clean the street PM resuspension is common</p> <p>15. Although referenced at action 19(c), astonishing that School Streets are not mentioned in this action, let alone what should be here - a plan for their rapid roll-out across the borough.</p>	<p>also due for publication</p> <p>8. See 5 above</p> <p>9. See 5 above</p> <p>10. Commented noted</p> <p>11. Consideration is being given to auditing all schools in Haringey pending funds being made available.</p> <p>12. The active travel team currently promote alternative means of transport in schools through the TfL Stars scheme etc.</p> <p>13. Comment noted and passed on to relevant service.</p> <p>14. See 13 above</p> <p>15. See 5 above</p>	
Delivery servicing and freight	15	Update of procurement policies to reduce pollution from logistics and servicing.	Measure on delivery servicing and freight were found to be rudimentary by a respondent. A suggestion was made that small deliveries in the Borough be made by cargo bike, which could be available on a hire scheme as in Waltham Forest.	Haringey is considering delivery by cargo bikes for local deliveries in future projects to tackle emission from business activities.	Accepted and amended.
		Ensure local authority procurement policies include a requirement for suppliers with large fleets to have attained bronze Fleet Operator Recognition Scheme (FORS) accreditation or equivalent standard	No comments made		
		Priority	Include specific reference to cargo bikes: Businesses in Crouch End are already using cargo bikes	Cargo bikes for site deliveries in Haringey are	Accepted - Plan will be

Seven broad priority actions:				4. <i>Delivery servicing and freight</i> 5. <i>Borough fleet action</i> 6. <i>Localised solutions</i> 7. <i>Cleaner transport</i>	
1. <i>Air Quality Monitoring and other core statutory duties</i> 2. <i>Emissions from developments and buildings</i> 3. <i>Public health and awareness raising</i>					
Action category	Action ID	Action name and description	Summary of theme and comments received	Council's consideration/Response	Impact or Change
		loading for ultra-low emission delivery vehicles	for deliveries. TfL are trialling cargo bikes for site deliveries in Haringey. It is a huge oversight not to include these vehicles which are much cheaper, cleaner, take up less space driven and parked, present a lower risk of harming other road users due to smaller, lighter and lower top speed, along with lower infrastructure maintenance costs due to lower weight than electric vans.	an important consideration. Haringey is considering delivery by cargo bikes for local deliveries in future projects to tackle emission from business activities.	amended to include Business Low Emission Neighbourhood following successful bid for funding
	16	Reducing emissions from deliveries to local businesses and residents: Re-organisation of freight to support consolidation (or micro-consolidation) of deliveries, by setting up or participating in new logistics facilities, and/or Potentially additional cost depending upon type of contract and distance needed to travel	Other suggestions include: <ol style="list-style-type: none"> 1. small deliveries in the Borough be made by cargo bike, which could be available on a hire scheme as in Waltham Forest. 2. Encourage bus companies, car drivers and lorry drivers to switch to cleaner fuels. 3. Incentivise deliveries to high street stores to happen outside of peak times to reduce emissions when people are around Work with surrounding boroughs about how to tackle cross-borough traffic Work with railways. Work on mechanisms to help local businesses to lower need for transport - such as delivery sharing etc. 4. Introduce workplace parking levy for all businesses (including private schools) employing more than 10 staff. 5. GPS navigator should show the level of pollution in cars and on the hotspots being transited. Yearly Climation with population, schools, businesses to improve air quality (connect with Climate Kic https://www.climate-kic.org/ for resources). Pollution kills more than terrorism, share this fact widely. 6. The issue of pollution from aircraft flying over the borough should be addressed by campaigning against a third runway at Heathrow and discouraging people from taking so many overseas holidays plus business trips because most of the latter can now be covered by video link meetings. 7. Assist popular anti-idling project by supplying business card size stickers with message e.g. 'please switch off your engine, help to save a child's life' for popular use. 8. Indicate how Haringey will seek to work with neighbouring boroughs and other bodies across London to minimise delivery traffic. Commit to the provision of a cycle network safe for children to use. Price residents parking by market value, as it stands it represents a significant subsidy to private motor vehicle ownership. Provide safe, sheltered bike parking in residential areas. 	<ol style="list-style-type: none"> 1. Cargo bikes for site deliveries in Haringey are an important consideration. Haringey is considering delivery by cargo bikes for local deliveries in future projects to tackle emission from business activities. 2. Haringey has a Transport Strategy which presents our vision on traffic within the borough. A Transport Policy Statement is also due for publication 3. See 1 above 4. See 2 above 5. This is outside the control of local authorities 6. This is outside the control of local authorities 7. As part of the London wide idling program funded by the Mayor, Haringey Council will be taking enforcement action and encouraging behaviour change to tackle idling. 8. See 2 above 	<ol style="list-style-type: none"> 1. Accepted - Plan will be amended to include Business Low Emission Neighbourhood following successful bid for funding 2. Points 2 – 8 No change

Seven broad priority actions: 1. <i>Air Quality Monitoring and other core statutory duties</i> 2. <i>Emissions from developments and buildings</i> 3. <i>Public health and awareness raising</i>				4. <i>Delivery servicing and freight</i> 5. <i>Borough fleet action</i> 6. <i>Localised solutions</i> 7. <i>Cleaner transport</i>	
Action category	Action ID	Action name and description	Summary of theme and comments received	Council's consideration/Response	Impact or Change
Borough Fleet	17				
		a) Increasing the number of hydrogens, electric, hybrid, bio-methane and cleaner vehicles in the boroughs' fleet	<p>These measures were welcome, and the following suggestions were made that the measure should cover waste management firms such as Veolia.</p> <ol style="list-style-type: none"> 1. A respondent commented that improvements to Council fleet and procurement incentives will have little impact on commercial delivery vehicles and heavy through traffic which must account for the majority of the air quality problem. Need cleaner (electric) buses, rubbish vehicles, and other state/council fleet were suggested. In addition, a discussion on the necessity for grid upgrades in cooperation with other boroughs on better public transport networks was considered to be very urgent because the electric grid imposes constraints for (fast) charging. 2. Reducing the number of vehicles in the borough fleet, replacing the most polluting with hydrogen, electric, hybrid, biomethane and other cleaner vehicles when no other options remain. This action is very unambitious, suggesting that it is not possible to reduce the overall number of fleet vehicles. Business as usual with cleaner vehicles is not ambitious. On outputs, rather than committing to: 'Review staff travel payments to incentivise use of cleaner vehicles and minimise mileage', there should be a clear commitment to incentivise walking and cycling for work purposes over motorised transport. 	<ol style="list-style-type: none"> 1. Haringey has a Transport Strategy which presents our vision on traffic within the borough. A Transport Policy Statement is also due for publication 2. See 1 above 	The report will be upgraded accordingly.
		Accelerate uptake of new ULEV in borough fleet	No comments made		
Localised solutions	18	Expanding and improving green Infrastructure (GI)	<ol style="list-style-type: none"> 1. Updating CPZ in Crouch End to complement that imposed by Islington Council to reduce localised air pollution: Pollution of Crouch End near Crescent Road N8, next to Coleridge School and the Parkland Walk which borders Islington by older/more polluting vehicles including vans, small lorries and old cars from nearby Islington streets using the streets as a free parking zone because our CPZ operates at a different time to theirs. This could be stopped simply by changing CPZ times, for example adding a 10-12 CPZ in Haringey streets and keeping the current 2-4pm restrictions 2. Implement notice board on highest levels of pollution (e.g. green lanes), to stipulate this to stop people parking and idling their engines. 3. Treat air pollution a public health emergency 	<ol style="list-style-type: none"> 1. A parking action plan is being developed that will consider this point. There is likely to be a formal public consultation on any suggestion made. 2. This comment has been passed on to transport-operation team for further consideration and action if feasible. 3. This comment has been forwarded to public health for consideration and action. 	No change.
	19	a) Low Emission Neighbourhoods (LENs)	<p>Low Emissions neighbourhoods and 19c) Trial of Road Closure around Schools and are the only ones I can see that would have an impact which would be widespread and significant.</p> <p>The resident will welcome further Liveable Neighbourhood schemes with filtered side roads. This should include Tree and shrub planting can absorb particulates from roads. 'Parklet' scheme</p> <ol style="list-style-type: none"> 1. Low traffic neighbourhoods in ALL residential areas to improve air quality around people's homes & discourage people making short journeys by car. 	<ol style="list-style-type: none"> 1. Other Liveable Neighbourhood schemes are being considered to the east of the borough. 2. A School Street Action Plan is also due for publication in 2020 and will address some of the measure necessary to tackle air pollution around schools. 	No change.

Seven broad priority actions: 1. Air Quality Monitoring and other core statutory duties 2. Emissions from developments and buildings 3. Public health and awareness raising				4. Delivery servicing and freight 5. Borough fleet action 6. Localised solutions 7. Cleaner transport	
Action category	Action ID	Action name and description	Summary of theme and comments received	Council's consideration/Response	Impact or Change
			2. Introduce Low Traffic Neighbourhoods all over the borough especially around schools and decrease the amount of road traffic that passes through Haringey. 3. <u>Promote the introduction of low-traffic neighbourhoods</u> , to stop through-traffic from using small residential streets, and to make the use of cars by residents rather more inconvenient (at present Satnavs are encouraging drivers to use residential streets, and the volume of traffic on main roads is consequently going down) 4. Some LENSs could be implemented largely with Transport Regulation Orders without huge cost. E.g. restrictions on private motor traffic in Turnpike Lane and Wightman Road to reduce congestion and improve efficiency of public transport e.g. 144 and 41 buses. 5. Space for expanding green infrastructure should be found by reducing on-street car parking spaces. 6. This action is far too vague. It needs to commit to delivery of a set number of LENSs over a set timeframe.	3. See 1 above 4. This comment has been forwarded to Transport team for consideration and action. 5. See 4 above 6. See 4 above	
		b) Low Emission Vehicle Strategy	1. Good to see canal boats included here. We should ask Canal & River Trust to implement policy that boats using solid fuel heaters should NOT moor adjacent to residential properties. 2. This action is very unambitious. Neighbouring boroughs are getting on with implementing school streets - this action does not commit to any action.	Haringey will be working in collaboration with Canal & River Trust	Accepted and changed.
		c) Trial of Road Closure around Schools	The word "trial" should be removed, and actual road closures suggested: Several comments were made to stipulate that the transport plan incorporated in the action plan was weak compare this to all surrounding boroughs transport planning. The general public strongly suggested that the following measures: 1. More temporary (e.g. Wightman Road) and permanent road closures because the major source of pollution is from road transport 2. Measure to render commuting through the borough impossible to restrain traffic 3. Have traffic restrictions and incorporate pedestrian areas 4. School streets for every school even on main roads 5. Prioritise pedestrian, cycle and public transport routes, movements and safety and convenience. 6. Especially welcome closure of roads around schools	1. Haringey has a Transport Strategy which presents our vision on traffic within the borough. A Transport Policy Statement is also due for publication 2. See 1 above 3. See 1 above 4. A School street Action plan is also due for publication in 2020 and will address some of the measure necessary to tackle air pollution around schools	No change.
		d) Public recognition of businesses that contribute to good air quality	No comments made		

Seven broad priority actions:				4. <i>Delivery servicing and freight</i> 5. <i>Borough fleet action</i> 6. <i>Localised solutions</i> 7. <i>Cleaner transport</i>	
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		e) Publicity of air quality status and Council activity	No comments made		
Cleaner transport	20	Ensuring that Transport and Air Quality policies and projects are integrated	<p>Most respondent welcome measures related to cleaner transport. Suggestions include:</p> <ol style="list-style-type: none"> 1. further traffic reducing measure could include extending community transport to serve people less able to walk/cycle/use public transport e.g. carers with double buggies plus toddlers, or elderly. This could be council sponsored- community- local employment project. 2. Much stronger measures to discourage car use and encourage the use of public transport or cycling (but given that cyclists on the road take up much more space than in a bus or train, I would put the emphasis on improving and promoting public transport in our crowded borough). 3. The ULEZ extension to the North Circular will mean many Haringey residents being priced out of their daily commute and unable to afford a ULEZ compliant car. To make this transition easier, residents need to have viable alternatives. Car sharing, cycling and public transport will be possible for many, but not residents. Haringey should make sure: Residents are fully informed of the ULEZ and are aware of their options Haringey makes sure more and better infrastructure for cyclists is built (bike racks/hangers, protected cycleways). 4. We would like the Borough to commit to participating in at least one car free day each year. 	<ol style="list-style-type: none"> 1. Haringey has a Transport Strategy which presents our vision on traffic within the borough. A Transport Policy Statement is also due for publication 2. See 1 above 3. See 1 above 4. Haringey is participating in a pan London Pedestrian Healthy Street project which requires participants to implement street closures on an agreed annual 'Healthy Streets Day'. 	No Change.
	21	Discouraging unnecessary idling by taxis and other vehicles	<p>A consensus was the AQAP failed to put more emphasis on protecting and improving public health, and in particular of reducing children's exposure to harmful NO₂ and PMs. Tacking Idling across the borough and around schools especially was the main subject of most discussed. Suggestion include:</p> <ul style="list-style-type: none"> • Assist popular anti-idling project by supplying business card size stickers with message e.g. 'please switch off your engine, help to save a child's life' for popular use • Getting bus drivers to switch off engines at stands e.g. Tottenham lane. • penalised for parking on double yellow lines to wait for their children • enforce and fine drivers for vehicle idling around schools • education and campaign again idling • Cars use Alexandra Park road as a rat run from the north circular and the road is jammed with North Circular traffic at busy times. This massively increases the pollution at Rhodes Avenue Primary School and all the children walking to school. therefore, High polluting cars should be made to stay on the North Circular. • Reduce cars and emissions near playgrounds. • Introduce Low Traffic Neighbourhoods all over the borough especially around schools and decrease the amount of road traffic that passes through Haringey. • Given the strong emphasis on schools and protecting schoolchildren there should be a commitment to explaining to parents and the local community what they can do to make 	<p>Dealing with idling by taxis and other vehicles is being considered as part of the wider pan London project funded by the MAQF as advertised on the Council webpage located at https://www.haringey.gov.uk/business/licensing-and-regulations/environment-and-waste/pollution-control/air-pollution/no-engine-idling-animation.</p> <p>Our Parking Action Plan due for publication also includes consideration to enforce idling vehicle.</p> <p>A School Street Action Plan is also due for publication in 2020 and will address some of the measure necessary to tackle air pollution around schools.</p>	No change

Seven broad priority actions:				4. <i>Delivery servicing and freight</i> 5. <i>Borough fleet action</i> 6. <i>Localised solutions</i> 7. <i>Cleaner transport</i>	
1. <i>Air Quality Monitoring and other core statutory duties</i> 2. <i>Emissions from developments and buildings</i> 3. <i>Public health and awareness raising</i>					
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			<p>their children safer, and what the Council is doing to achieve this. Examples for parents are making use of walking zones for travelling to school, supporting their school in joining the TfL STARS scheme, and supporting road closures around schools. There should also be mention of trialling green infrastructure such as hedge installation to protect schools on busy main roads, and tree planting on main roads themselves</p> <ul style="list-style-type: none"> Schools need pollution screens as children are being exposed to high levels of pollution and Haringey has a duty of care to ensure children are learning in a safe environment! Spot people and vulnerable people being exposed to secondary smoking, and secondary toxic gas from vehicles. To include air filter systems in schools so the children aren't breathing in polluted air all day Encourage parents to walk or cycle their children to school instead of driving them by car Investigate the petrol station being so close to Rokesly school. Cleaning the street PM resuspension is common 		
	22	Regular temporary car free days	<p>The implementation of more car/traffic free days was encouraged across the borough with special emphasis on most polluted areas like focus areas. An example of traffic-Free Sunday was suggested on Green Lane.</p> <p>One-off car free days are worthwhile events but are not likely to lead to a meaningful change in transport behaviour and we are not aware of any evidence that they do. Some car free days should be used to gain community buy-in for larger scale, permanent area-wide traffic removal.</p>	Car free events and road closures are also being considered as part of the pan London pedestrianisation scheme funded by the MAQF.	No change
	23	Using parking policy to reduce pollution emissions	<p>Enforcement and higher fee were the main interventions to reduce pollution across Haringey. following suggestions were made:</p> <ol style="list-style-type: none"> Ban car parking on Green Lanes and other high streets CPZ hours should be in accordance with surrounding boroughs deprioritise car parking and move parking onto ladder roads and create a better flowing well provision traffic strategy that prioritises buses, cycling and walking Stop catering to non-local North/South traffic in the borough Introduce workplace parking levy for all businesses (including private schools) employing more than 10 staff. Introduce free parking for electric vehicles charging more for parking and charging more for parking permits where two or more vehicles are used by one household. This measure could help reduce the number of petrol and diesel vehicles in the borough. It was recognised that this measure will have regressive effects because it encourages paving over of front gardens, and doesn't hit those in properties large enough for off-street parking, which tend to be higher income households More vehicle free areas & pedestrianised streets e.g. Muswell Hill Broadway & Crouch end. Higher costs for parking & the curtailment of people turning front gardens full of plants into car parking spaces full of concrete enforce and fine drivers for vehicle idling around schools. Reduce parking spots, increase fee for gas cars, and free parking for electric cars. Provide subsidies for hybrid and electric cars Closure all public, Council, NHS PLUS CCG car parks and make allowances for disable and 	<ol style="list-style-type: none"> This recommendation will be considered in the parking action plan due for publication. See 1 above. See 1 above. See 1 above. This is being considered by colleagues in Transport Planning/Caron Management EV's receive a substantial discount. Although EV's produce far less pollution they do still produce Particulate Matter from brake dust, tyre wear and congestion and so should pay a fee for this. As part of PAP we shall be seeking to introduce an incremental fee for multi-car households. This may be considered through further Liveable Neighbourhood type schemes. See 1 above. 	No change

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			<p>two wheeled transport. E.g. In Zurich, it is easier to drive through easily but difficult to stop and paid.</p> <p>14. limit public space used for parking and limit public space used for car lanes/driving</p> <p>15. penalised parents for parking on double yellow lines to wait for their children</p> <p>16. This again is key. The Council should be reducing the number of parking spaces for private fossil-fuel motor vehicles across the borough.</p>	<p>10. Enforcement vehicle idling will be addressed as part of the Pan London Idling project funded by the MAQF.</p> <p>11. PAP considers reducing parking spaces in CPZs should demand/occupancy allow and for these spaces to be converted to EVCP's, planting etc.</p> <p>12. Haringey will continue to search funding the implement this measure.</p> <p>13. Noted</p> <p>14. see 11</p> <p>15. Enforcement vehicle idling will be addressed as part of the Pan London Idling project funded by the MAQF</p> <p>16. See 11.</p>	
	24	a) Installation of Ultra-low Emission Vehicle (ULEV) infrastructure (electric vehicle charging points, rapid electric vehicle charging point and hydrogen refuelling stations): Support GLA in the Expansio	<p>The following measures were suggested:</p> <ol style="list-style-type: none"> 1. Anti-car measures are regressive and hammer the poorest who can least afford to pay and help deal with air pollution. 2. Ban non-electric car use across the borough, increasingly from a few days a year. 3. Investigate partnerships with electric vehicle fleets (e.g. Zipcar, E-Car) to increase the number of easy access vehicles across the borough. 4. Much greater disincentives for internal combustion engine vehicles 5. Massively increase the number electric car charging points 6. Changing the Source London electric charging points to a more affordable option would help drive people to electric vehicles. 7. cleaner (electric) buses, rubbish vehicles, and other state/council fleet imminently. 8. Investigate charging points across the borough potentially linking with households with solar panels - fitting battery charging points for free in return for % of energy produced e.g. x hours per week but no other financial incentives. 9. The ultra-low emission zone should also be extended, with immediate effect. 10. ensuring that the drive to install charging infrastructure for ULEV vehicles for residents and commercial vehicles such as taxis continues 11. The move to electric cars will help but will take some time to have a significant effect, and delivery and other commercial vehicles will lag behind and seem likely to continue to increase in numbers due to internet shopping. More traffic jams are to be expected and electric vehicles continue to produce particulates from their tyres/brakes. 12. The ULEZ discriminates against poorer people - much more needs to be done to provide them, as well as everyone else, with alternatives. There is no mention of public transport at all in the Action Plan - this is certainly not the primary responsibility of Haringey Council, but negotiation with TfL has to be a priority. 13. EV chargers must not be installed on the pavement or in ways that block potential cycle routes 	<p>The suggestions have been noted and will be given further consideration as part of the wider actions to reduce air pollution across Haringey.</p>	No change.

Seven broad priority actions:				4. <i>Delivery servicing and freight</i> 5. <i>Borough fleet action</i> 6. <i>Localised solutions</i> 7. <i>Cleaner transport</i>	
1. <i>Air Quality Monitoring and other core statutory duties</i> 2. <i>Emissions from developments and buildings</i> 3. <i>Public health and awareness raising</i>					
Action category	Action ID	Action name and description	Summary of theme and comments received	Council's consideration/Response	Impact or Change
		n of ULEZ	as was done in the first tranche of on-street EV chargers in Haringey. Installations should focus on off-street parking areas for shared vehicles (i.e. car clubs). 14. car replacement will make us lose a lot of money for selling up LEZCAR..Can I claim compensation? How to stop cars commuting through Haringey from/to central London city and west end, are they the highest polluters		
		b) Increasing the proportion of electric, hydrogen and ultra-low emission vehicles in Car Clubs	A respondent would like to see full support for car clubs and the provision of more dedicated parking for these.	The following provides link to car clubs https://www.haringey.gov.uk/parking-roads-and-travel/travel/car-clubs-haringey	No change
		c) Increase the introduction and use of Car Clubs across the borough	No comments made		
		Free or discounted parking charges at existing parking meters for zero emission cars. Free or discounted residential parking permits for	The Council should encourage a shift to low- or zero-emission vehicles by setting charges for resident's parking permits more steeply against emissions of pollutants and CO ₂ .	Increasing of parking charges is due for consideration by the Cabinet and parking.	No change.

Seven broad priority actions: 1. <i>Air Quality Monitoring and other core statutory duties</i> 2. <i>Emissions from developments and buildings</i> 3. <i>Public health and awareness raising</i>				4. <i>Delivery servicing and freight</i> 5. <i>Borough fleet action</i> 6. <i>Localised solutions</i> 7. <i>Cleaner transport</i>	
Action category	Action ID	Action name and description	Summary of theme and comments received	Council's consideration/Response	Impact or Change
		zero emission cars and/or surcharge on diesel vehicles below Euro 6 standards for Resident and Controlled Parking Zone permits			
		d) Install ation of residential electric charge points including within developments	1. This section is misleading as there is no such thing as 'free' parking. If no revenue is made via charging for car parking, the upkeep/enforcement etc. costs fall to Council taxpayers. We therefore strongly oppose providing a subsidy to car drivers in this manner. Lower emission vehicles should be encouraged through price signals that disincentivise the most polluting, not through subsidising owners of cleaner vehicles. 2. Haringey currently charge over £30 per annum for a secure residential cycle parking space. There should never be a circumstance when the charge for parking a car is less than the cost of parking a bicycle. 3. In addition, there is no such thing as a 'zero emission car', a more accurate way to describe a fully electric car, which still emits considerable emissions in manufacture and use, is 'zero tailpipe emission'.	These comments have been noted and will be given further consideration.	No change.
		e) Install ation of rapid chargers to help enable the take up of electric taxis, cabs and commercial vehicles (in partnership with TfL and/or OLEV)	No comment	No comment	No Change

Seven broad priority actions: 1. <i>Air Quality Monitoring and other core statutory duties</i> 2. <i>Emissions from developments and buildings</i> 3. <i>Public health and awareness raising</i>				4. <i>Delivery servicing and freight</i> 5. <i>Borough fleet action</i> 6. <i>Localised solutions</i> 7. <i>Cleaner transport</i>	
Action category	Action ID	Action name and description	Summary of theme and comments received	Council's consideration/Response	Impact or Change
		f) Reprioritisation of road space; reducing parking at some destinations and or restricting parking on congested high streets and A roads to improve bus journey times, cycling experience, and reduce emissions caused by congested traffic	The Council should re-allocate road space away from private motor vehicles. Major schemes are needed, not minor tinkering. Wightman Road, Turnpike Lane, Green Lanes are all potential routes where a big shift to cycling and bus use could result.	Haringey has a Transport Strategy which presents our vision on traffic within the borough. A Transport Policy Statement is also due for publication	No change.
	25	Provision of infrastructure to support walking and cycling To enable cycling by increasing the number of secure cycle parking spaces.	Provision of adequate infrastructure was considered to be at the top priority to reduce air pollution in Haringey. A greater priority was recommended on encouraging cycling through the implementation of cycling infrastructure to recognized quality standards. The following measures were suggested: 1. Create protected cycle lanes on Green Lanes and other high streets 2. promote more use of bike and dramatically increase bike racks/hanger on the high road and in front of shops to enable people to run errands and do their shopping on their bike to mimic the Dutch model. 3. Interactive panels should be visible on the critical hotspots around schools, main arteries, crossroad. Also, actions with Driving school instructors to educate new drivers. 4. Poor driving ability is a major cause of polluting behaviour. GPS navigator should show the level of pollution in cars and on the hotspots being transited. Yearly Climation with population, schools, businesses to improve air quality (connect with Climate Kic https://www.climate-kic.org/ for resources). Pollution kills more than terrorism, share this fact widely.	Haringey has a Transport Strategy that presents our vision on traffic within the borough. A Transport Policy Statement is also due for publication.	No change

Seven broad priority actions:				4. <i>Delivery servicing and freight</i> 5. <i>Borough fleet action</i> 6. <i>Localised solutions</i> 7. <i>Cleaner transport</i>	
1. <i>Air Quality Monitoring and other core statutory duties</i> 2. <i>Emissions from developments and buildings</i> 3. <i>Public health and awareness raising</i>					
Action category	Action ID	Action name and description	Summary of theme and comments received	Council's consideration/Response	Impact or Change
			5. A Dutch style cycle infrastructure which includes protected bicycle lanes along the main arteries... moving prioritisation away from motor vehicle traffic and onto cycling and other green acceptable alternatives like e-scooters. 6. Firm commitment to create cycle paths on every main road to change behaviour 7. Safe cycling to create less pollution. 8. Protected cycling infrastructure on the main roads (e.g. A10, West Green Road, Philip Lane, Lordship Lane, Hornsey Hill, etc) 9. Cycle paths (segregated and safe) on all roads. Where roads are too thin for 2-way motor traffic and parked cars, close them to such traffic and thereby discourage unnecessary and polluting car journeys. 10. Make buses, walking and cycling so easy that driving is a last resort. 11. More cycle lanes and build bike hangers, parking spots and bike-friendly areas 12. Dealt with broken glass on the ground, which is barrier to cycling in Haringey 13. to promote walking & cycling infrastructure. The commitments to increasing walking and cycling uptake need to be strengthened. 14. Reduce car park spaces, replace with wider pavements, bike parking, bike paths 15. Incentivise walking/travelling by bicycle by reducing council rates for those who live in a more sustainable way 16. Build a segregated northbound bike path on Green Lanes and widen the pavement. Make the bus lane on Green Lanes 24hr no parking. Increase parking charges. Make bike lockers free to use. Filter 50% of all residential side roads. Enforce pavement parking with tow trucks. Remove parking facilities on high streets. 17. Widen roads such as park road to avoid stationery vehicles stuck in traffic causing unnecessary and nasty pollution 18. Haringey staff/employees need to be incentivised to walk or cycle or take public transport to walk. 19. Emphasis on changing some of our spaces and making a real difference in making better cycle lanes that make it less dangerous for cyclists and much more accessible. 20. Better linked cycle paths and better cycle training for children, young people and vulnerable adults. 21. It was suggested that some specific proposals to changes in infrastructure, where and how cycling infrastructure could be improved would be useful. Also, specific ideas for changes to high road pollution areas such as traffic reduction by making one-way roads or blocking some roads at one end (thinking of the Haringey ladder roads). 22. Encourage people to cycle to schools and shops. 23. Increase provision of on-street cycle storage lockers to keep up with demand (as recommended by Tottenham Carbon Commission): this should be revenue-neutral, as they are rented out. However, rentals should not exceed resident car parking rates. Promote 'car share' clubs and designated parking provision for them. 24. increase segregated one-way cycle infrastructure, e.g. best practice "Copenhagen" style, ref. http://www.copenhagenize.com/ https://gehlpeople.com/ 25. place the segregated one-way cycle infra. to accommodate shortest route from A-B (not "Quite"/detour routes); 26. on existing streets, along both sides of waterways and railway tracks (e.g. New River) together with segregated walking infrastructure – use waterways for cargo transport on electric boats to connect to cargo bicycle infrastructure (think Amsterdam/Copenhagen/Venice waterways)		

Seven broad priority actions: 1. Air Quality Monitoring and other core statutory duties 2. Emissions from developments and buildings 3. Public health and awareness raising				4. Delivery servicing and freight 5. Borough fleet action 6. Localised solutions 7. Cleaner transport	
Action category	Action ID	Action name and description	Summary of theme and comments received	Council's consideration/Response	Impact or Change
			27. This section seems to suggest that cycle parking is the greatest infrastructural impediment to cycling in Haringey. All the evidence suggests otherwise, that a lack of safe places to cycle (due to the continued prioritisation of space and routes for motor vehicles) is the greatest barrier to more cycling in Haringey. This action needs to be much more specific about what infrastructure is required to increase walking and cycling.		
26. Actual AQAP structure			1. Whilst the measures are announced are clearly well intentioned it remains to be seen if they're sufficient to have an impact on air quality in the absence of broader London wide initiatives. e.g. improvements to council fleet and procurement incentives will have little impact on commercial delivery vehicles and heavy through traffic which must account for the majority of the air quality problem 2. You need to have very specific goals which must be measurable. This means an absolute focus on numbers and dates. You must aim to reduce for example transport pollution by (. fill in the date.) and by this much (fill in the amount/percentage). You should plan how to do this with strict measures (for example absolute road closure for x distance around schools at drop-off and pick-up times). To discourage is not good enough. It has to be forbidden and it has to be law. 3. It is not clear what these priorities are. Are they in the 2010-18 report? The objectives seem reasonable although there are no targets so 'improve' and 'involve' can be achieved easily. Engage residents in agreeing a vision 4. Where are and what are the 7 priorities 5. You'd need to show me the 7 priorities. 6. The proposals are vague. This is especially the case for neighbourhood solutions. Nothing specific is proposed. There will still need to be efficient access for vehicles. Disabled drivers are not mentioned at all. Are they to be trapped at home? 7. You need to address the issue of pollution from aircraft flying over our borough by campaigning against a third runway at Heathrow and discouraging people from taking so many overseas holidays plus business trips (most of the latter can now be covered by video link meetings) 8. Overall strategic priority for transport and built development planning	The comments have been noted. Please note that the AQAP follows a template and priority rating recommended by the GLA.	No change

Table 2 Air Quality Action Plan 2019-24 Statutory Consultees Received

Date	Ref.	Organisation	Summary of theme and comments received	Council's consideration/Response	Impact or Change
24/09/2019	1	Greater London Authority	1. Monitoring and other core statutory duties: <ul style="list-style-type: none"> specify how many additional monitoring stations will be installed and 80% data capture not enough. 2. Emissions from developments and buildings: <ul style="list-style-type: none"> Produce guidance earlier than 2021, Define how we will promote the energy performance regulations to commercial and 	1. Install 20 new diffusion tube monitors by 2020, Over 90% data capture 2. Guidance published by the end of 2020, Promote the Minimum Energy Performance Regulation requirements to commercial and residential landlords on	

			<p>residential landlords and</p> <ul style="list-style-type: none"> • Include the Council's targets for retrofits/carbon reduction. <p>3. Delivery servicing and freight:</p> <ul style="list-style-type: none"> • Deadline date of 2030 for all actions too far away, • Provide specific deadlines for all actions. <p>4. Localised solutions:</p> <ul style="list-style-type: none"> • All actions too vague provide specific actions with deadlines • Include your local targets from your cycling and walking action plan. 	<p>the Council's website and via Haringey's Home Finder Scheme and Private Sector Housing team at Landlord forums and Reduce CO₂ emissions by 40% by 2020 and being Zero-Carbon by 2050.</p> <p>3. Publication of new procurement strategy to include pollution reduction measures by end of 2019, increase the no> of ULEV in council owned fleet by 80% by 2021, review use of electric pool cars for staff use and investigate viability of buying more by 2021, review Staff Travel Plan to include travel payments to incentivise use of cleaner vehicles and minimise mileage and investigate Tax benefits of electric vehicles: fossil fuelled vehicles – consider including salary sacrifice schemes for employees – by Mar 2020, Incentivise providers of Passenger transport to use electric/low emission vehicles through the procurement process – Mar 2020.</p> <p>4. Introduce a policy of maximising green infrastructure in all regeneration schemes and large scale developments March 2020, investigate options for green infrastructure in schools in areas of higher pollution subject to funding as part of the school street action plan by Mar 2020, develop a new parks strategy to be delivered by end of year 2020, delivery of 40 additional trees in Wightman Road by 2020, 60 per year thereafter and apply to the Urban Tree Challenge Fund to fund up to 750 trees over two years. 81% of all trips to be made by foot, cycling or public transport by 2021 (88% by 2041), 20% of residents within 400m of a cycle network - by 2021 and 41% of residents doing at least 2X10mins (or 1 block of 20mins) of active travel per day by 2021.</p>	
10/07/2019	2	Ferry Lane Action Group (FLAG)	<p>5. FLAG recognised by Homes for Haringey as the resident's group for the Ferry Lane Estate in Tottenham supports the action plan in general. It was suggested that London-wide schemes such as the Ultra-Low Emission Zone are likely to deliver the greatest benefit in combination of local actions.</p> <p>6. Tottenham Hale is one of the areas with the highest pollution levels in the borough, and this will include parts of the estate nearest Ferry Lane. And we are all affected when we go to the station, retail park or beyond.</p> <p>7. The plan also mentions dealing with pollution from canal boats (in action 19b). This can</p>	<p>All the comments made have been noted</p> <p>The suggestion to restrict mooring within residential areas is being considered within the plan.</p>	Accepted and changed to include restriction of mooring

			<p>be from engines and from stoves burning wood or coke. Usually the engines are only in use for short periods, but the stoves can be burning and creating smoke and invisible fumes for long periods in winter. This has a direct effect on residents in flats or houses adjacent to the river. The fumes can rise and blow straight into windows.</p> <p>8. It was suggested the Council to work with the Canal & River Trust to implement a policy that boats using solid fuel heaters should not moor adjacent to residential properties. That will not stop boat-dwellers keeping warm, but it would mean they have to moor on other stretches when they need to burn. Meanwhile boats with gas-fired heaters could still moor here.</p>		
23/07/2019	3	Natural England	<p>9. Natural England does not consider that the London Borough of Haringey's Air Quality Action Plan poses any likely risk or opportunity in relation to our statutory purpose, and so made no significant comment on this consultation.</p>	Comment noted.	No change.
26/07/2019	4	Environment Agency	<p>10. Unfortunately, the EA we are not able to provide detailed comments on every Air Quality Action Plan received. Therefore, a summary of issues/priorities that are common to each air quality action plan and where possible/appropriate, was provided.</p> <p>11. It is important to note that we are not aware of any waste facilities or other industrial installations regulated by the Environment Agency in the London borough of Haringey that are causing or contributing to failures of air quality standards.</p> <p>12. It is encouraging to see that consideration within the planning stage of development(s) and construction is playing a role in the London borough of Haringey's Air Quality Action Plan 2019-2024 - i.e.: the intensification of activities (e.g.: waste management facilities) may require to be fully enclosed within the future.</p> <p>13. Also, it is good to see that the Environment Agency and the London borough of Haringey agree in that we both need to cooperate and work together, not just with one another – but also with the other London borough's and in line with the London Plan</p>	The comments have been noted.	No change.
26/07/2019	5	Haringey Liberal Democrat	<p>To whom it may concern,</p> <p>Please see below the Haringey Liberal Democrat response to the Air Quality Action Plan. The online survey is focused on getting data, it was not easy to provide our response in a well-presented way, so I have emailed it.</p> <p>***</p> <p>I am Haringey Liberal Democrat spokesperson on the Environment. I am replying on behalf of the fifteen Liberal Democrat members of Haringey Council.</p> <p>We welcome most of the individual measures in the Plan. However, taken as a package, they do not amount to an adequate response to the problem of air pollution.</p> <p>We know that poor air quality causes a wide range of health issues and is a contributor to many fatalities in our borough. We also know that children are most vulnerable to its effects.</p> <p>It also stands apart morally from many other public health concerns. While it would be misguided, in the extreme, to ignore the existence of societal factors that influence the propensity to smoke; drink to excess; or eat a poor diet, at some level one usually has to make an active choice to smoke a cigarette, drink a glass of wine or eat a burger. By contrast, we all have to breathe and can exert only limited control over the quality of the air we inhale. There simply is not a practical way to live in Haringey without being hurt by air pollution.</p> <p>This creates an ethical imperative for us to tackle poor air quality in a far more forthright</p>	<p>The comments have been noted.</p> <ol style="list-style-type: none"> 1. A School street Action plan is also due for publication in 2020 and will address some of the measure necessary to tackle air pollution around schools. 2. Air quality is measured on an hourly basis by the 2 continuous monitoring stations within the borough. 3. See 1 above 4. Enforcement vehicle idling will be addressed as part of the Pan London Idling project funded by the MAQF. 5. The Council is considering monitoring particulate matter. 	No change

			<p>manner than this plan envisages, that would probably necessitate a fundamental rewrite to make it more ambitious and include more specific actions and targets. This would probably also require the injection of additional resources into this area by the Council.</p> <p>However, if the current plan is retained then we would recommend the following modifications:</p> <ol style="list-style-type: none"> 1. It needs to reflect the resolutions of the motion entitled “improving air quality around schools” passed by Full Council on the 18th March 2019. At present, the plan only discusses School Streets in the context of a pilot at Lordship Lane Primary School. School Streets have long been successful and this plan should follow other boroughs in including a full programme across Haringey. At a minimum it should include the fact that a School Street action plan is due in March 2020, as set out in the motion. 2. Monitoring of pollution levels needs to account for variations depending on the time of the day, week and year. For example, it would be wrong to conclude that the area around a school was not a pollution hotspot unless the reading was taken during drop-off or collection times. 3. The Council should consider taking on a ‘corporate’ responsibility for ensuring that children in Haringey are not exposed to unsafe levels of air pollution. 4. More rigorous enforcement of no-idling rules. This could potentially include an ‘invest to save’ approach, where more enforcement officers are funded by the fines they collect. The Council should also encourage its own staff and councillors to become trained to act as no-idling volunteers. 5. The Council should commit to the reintroduction of PM 2.5 and 10 monitoring and remove the language in action 1 making this conditional evidence showing there is a need. The adverse public health impacts of these kind of very fine particles are well document by the World Health Organisation among other sources. If the claim is that we need evidence that the levels of these pollutants have reached dangerous levels in Haringey, then this is likely to be more evident if the Council monitors these pollutants. 		
30/07/2019	6	Tottenham & Wood Green Friends of the Earth	<ol style="list-style-type: none"> 1. <i>Tottenham & Wood Green Friends of the Earth strongly support the action plan in general and reiterated their concerns about the health impacts of air pollution, and recognised that most of the sources of pollution are also sources of carbon dioxide and so tackling these sources is vital for averting the worst of climate breakdown, as well as yielding immediate health benefits.</i> 2. <i>It was noted that an overall weakness, that the key actions that will deliver greater benefits are mostly dependent on securing funding. Therefore, increasing revenue from increasing parking permits charges to fund action to cut pollution and greenhouse gas emissions was suggested. With this increased income the Council could improve monitoring, give residents more feedback about the need to constrain car use, and can deliver the more sustainable transport options such as School Streets, Cycle Storage, Active Travel, and better footpaths set out in the action plan, in the Zero 50 route map, and in the draft walking and cycling strategy.</i> 	<ol style="list-style-type: none"> 1. Our carbon management plan explain how carbon dioxide specially will be tackle within the borough and both plans are complementary. 2. increasing parking permits charges to fund action to cut pollution and greenhouse gas emissions will be suggested to the relevant parking team within Haringey Council. It is likely that changing current parking policy will go through formal consultation. 	No change.
30/07/2019	7	PHE London-North East and North	<p>It is clear from reading them that this is aimed at residents or businesses located in Haringey rather than corporate partners/stakeholders so I don't think it would be appropriate for us to take part in this part of the consultation.</p> <p>But do get back to me if you disagree</p>	Comment noted	No change.
31/07/2019	8	Highgate Society Sustainable Living/Transition Highgate and Hornsey/ Wood	<ul style="list-style-type: none"> • The questionnaire was poorly designed and any inferences from the questionnaire would distort policy decisions. It was however suggested that the draft air quality has improved from the previous version and that the intention to work collaboratively across all the relevant departments is extremely hopeful. • It was further suggested that the actions need to be clear and deliverable, but there are 	Comments noted.	No change

		Green Labour Climate Change and Environment Group	<p>several examples where 'explore', 'where practicable' etc are used, and these should be replaced by specific immediate actions. Sequential plans should become parallel plans. In some cases, where there are already regulations in place, enforcement needs to now be enacted e.g. open fires, vehicles blocking charge points etc.</p> <ul style="list-style-type: none"> The above actions are particularly important now that Haringey Council has declared a Climate Emergency it is vital to do as much as possible as soon as possible to minimise climate breakdown, and these actions aimed at reducing Air Pollution will also do this. Further comment was in accordance other suggestions made as detailed in Table 1. 		
31/07/2019	9	Haringey Living Streets	<p>The need for an Air Quality Action Plan has never been greater. Air pollution is a major concern affecting the health of everyone and particularly children and old people. Haringey Living Streets is therefore pleased that the Council is beginning to recognise this problem.</p> <p>The major cause of pollution is from road traffic and its reduction is therefore a key objective. This is not adequately dealt with in the plan. Much stronger measures are needed to cut road traffic. Measures can be divided between controls and incentives.</p> <p>Controls include:</p> <ul style="list-style-type: none"> Restrictions on the number of parking places and extension of CPZs Higher charges for parking Parking restrictions to permit free movement of walker and cyclists particularly around schools More low traffic neighbourhoods where through traffic is banned Giving priority to walking and cycling overpowered vehicles Lower speed limits: 20mph on all roads and lower limits in busy areas. <p>Incentives include:</p> <ul style="list-style-type: none"> Awareness campaigns Better access to public transport (where this is within the Council's control) Better walking and cycling routes. This includes moves to ensure that pavements are kept in good repair, that road crossings are made more pedestrian friendly and that pavements are not cluttered with unnecessary street furniture, including electric vehicle charging points Promotion of cargo bikes for deliveries. <p>A key measure proposed is the replacement of fossil fuel with electricity. Whilst electric vehicles solve the problem of tailpipe emission and is a necessary measure for essential vehicles such as refuse collection vehicles and buses, it goes nowhere near eliminating pollution from brakes, tyres and road dust nor from emissions produced in manufacture. It also does nothing to deal with danger and congestion, factors discouraging walking and cycling. Promotion of electric cars as an alternative to fossil-fuelled cars is therefore not something which should be encouraged.</p> <p>We look forward to seeing a timetable of action to implement the measures described. The comments specific measures have been added to Table 1.</p>	Comments noted	No change

31/07/2019	10	Haringey Cycling Campaign	<p>The overall view of Haringey Cycling Campaign is that the actions proposed within the AQAP for transport emissions are not anywhere near as ambitious or far-reaching as they should be as detailed in the following section.</p> <ol style="list-style-type: none"> 1. At a time where there is growing recognition of the damage being done to our health by poor air quality, coupled with a climate emergency, there has never been a more appropriate time for bold action to get us out of our cars and on to truly clean, active transport. This draft air quality action plan, whose proposals for transport appear to be aimed mainly at converting existing trips by fossil fuelled motor transport to battery powered motor transport, is completely incompatible with the Council's declared climate emergency, and is often incompatible with at least three out of the four outcomes of Haringey's adopted transport strategy. As such this plan is not fit for purpose. 2. This plan will not help us to deal with poor air quality in the urgent manner that is required and will not tackle the other negativities of car-based travel in urban areas including the epidemic of inactivity and the pressing need to reduce road danger. Haringey needs to think again and come back with much bolder plans to reduce car travel and increase the mode share of walking and cycling. We have perhaps 12 years to avert a climate catastrophe, we have no time to waste in more studies considering what action might be taken, or in promoting the use of slightly cleaner cars. From the evidence of other boroughs, we know what works to enable more walking and cycling and improve air quality: a dense cycle network separated from traffic; low traffic neighbourhoods; and slower vehicle speeds. This plan contains no firm commitment to deliver any of those things, while containing firmer commitments to deliver de facto subsidies for car drivers in the form of 'free' parking and other benefits. 3. The Minister of State for Transport recently suggested that converting all existing fossil-fuelled car trips to EV powered car trips would be a 'total policy failure'. However this action plan appears to be a plan for just that scenario, where the vision for transport in Haringey seems to be one where the roads are just as congested as they are now, where the roads are just as hostile as they are now, and where transport poverty is even more stark for those not able to afford a car - but one where car drivers are encouraged and subsidised to drive slightly cleaner vehicles. Any reasonable assessment of transportation in future urban areas would conclude that we need fewer cars not cleaner cars, unfortunately there is little in this action plan that will facilitate this transition. In the midst of a climate breakdown it is irresponsible in the extreme to encourage further use of transport that is so carbon intensive in both manufacture and use. 4. This document's actions appear to reflect a desire to maintain business as usual, while deferring the difficult decisions needed to reduce the convenience of the car for shorter journeys. The upcoming Environment Bill is likely to set public bodies a legally binding commitment to reduce particulate pollution, with an obligation on local authorities to take additional action to protect children and the elderly. This action plan appears to think promoting the use of vehicles that emit considerable amounts of non-tailpipe particulate matter is a sensible way forward. The consequence of this policy, and the putting off of 	<ol style="list-style-type: none"> 1. The measures being proposed aim to reduce emissions 2. Cycle network separated from traffic; low traffic neighbourhoods; and slower vehicle speeds are considered as part of the plan. 3. There is proposal for Cleaner transport (Action 20) to improve public health and reduce air pollution in our plan. 4. Comment noted. 5. At least 42% of the consultee agreed that the seven actions identified by priority will meet the needs of the borough and help reduce pollution. 	No change
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			<p>the difficult actions that are required until sometime in the future, is that children currently growing up in areas of poor air quality are likely to see little or no improvement as a consequence of this plan over the time of their childhoods, leaving them to bear the health consequences of Haringey's inaction for the rest of their lives. Haringey could be a place where anyone feels they can choose truly zero-emission transport - walking and cycling - for any of their journeys. The reason it is not, is the almost total car dominance of our streets, along with decades of car-focussed transport planning. This needs to change, but this plan suggests change is still some way off.</p> <p>5. While we think this plan needs substantial re-working from first principles, we have provided comments on specific section that have been incorporated in Table 1 together with other comments made by other.</p>		
6/08/2019	11	Islington Council	<p>Islington agreed that pollution is a transboundary problem the therefore it is very important to work together to improve air pollution not only in our borough but also more widely. Islington Council's welcomes the actions that Haringey council intent to take many of the main sources of pollution with actions proven to improve air quality. In particular, the greater link to Public Health, actions focusing on schools and businesses, and initiatives to reduce emissions from transport and encourage a shift to active travel. We look forward to seeing the outcomes of the planned actions and hope Haringey will share their learnings where possible.</p> <p>It was suggested that the two boroughs work together to develop a joint initiative similar to the joint activities they currently undertake with Hackney Council where we have developed Ultra Low Emissions Streets towards the south of our borough.</p> <p>Haringey could learn from other boroughs. For example, Islington already has parking surcharges in place for diesel vehicles and is working with the canal and river trust on reducing emissions from canal boats.</p> <p>A provision of further information from dated scheme mentioned in the AQAP such as Mayors Air Quality Funding for Low Emission Neighbourhoods or the first school street in Haringey was suggested.</p>	Haringey will continue collaborative working with other boroughs.	No change.
28/07/2019	12	Resident	<p>I also agree with many of the measures being considered such as reducing the number of road traffic journeys and reducing the emissions and the harm of any journeys.</p> <p>However, my general understanding is that the best way to reduce the harm from vehicle emissions is to sperate pedestrians, cyclists and children from vehicles. It has been demonstrated that for every meter one is from traffic the affects and pollution reduce dramatically, especially if there is an element of nature between the two parties.</p> <p>Therefore, that is my main focus. The separation of people from traffic, and the promotion of non-traffic journeys, thereby reducing traffic and making these journeys more pleasurable, creating a virtuous circle, where people will decide that walking or cycling is</p>	Comments noted.	No change.

			<p>the best journey option.</p> <p>I have also focussed on my locality as I understand the geography and issues in more detail, however I feel these measures would benefit a large proportion of people in the area and I would support any such measures in other locations not mentioned.</p> <p>Therefore, from the action plan I have focussed on these stated aims:</p> <ul style="list-style-type: none">○ Localised solutions: these seek to improve the environment of neighbourhoods through a combination of measures - for example; expanding and improvement of green infrastructure and Low Emission Neighbourhood programmes.○ Infrastructure - increase cycling and walking infrastructure○ Other measures include: Promote Walking and Cycling		
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London Borough of Haringey

Air Quality Action Plan 2019-2024

London Borough of Haringey Air Quality Action Plan **2019-2024**

SUMMARY

This Air Quality Action Plan (AQAP) has been produced as part of our duty to London Local Air Quality Management. It outlines the action we will take to improve air quality in London Borough of Haringey (Haringey) between 2019-2024.

This action plan replaces the previous action plan, which ran from 2010-2018. Highlights of successful projects delivered through the past action plan include:

- employment of an Air Quality Apprentice to deliver awareness raising exercises and smarter travel initiatives in schools;
- employment of a shared Non-Road Mobile Machinery (NRMM) Enforcement Officer to enforce planning conditions;
- delivery of internal and public workshops to increase knowledge about the causes and effects of air quality with actions to improve it
- Work with Development Management to ensure that the air quality impacts upon new developments are appropriately assessed and mitigated.
- Public transport improvements and cycling/walking infrastructure are being delivered via the Local Implementation Plan (LIP).

Air pollution is associated with several adverse health impacts; it is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions. There is also often a strong correlation with equalities issues, because areas with poor air quality are also often the less affluent areas^{1,2}.

The annual health costs to society of the impacts of air pollution in the UK is estimated to be roughly £15 billion³. Haringey is committed to reducing the exposure of people in the Borough to poor air quality in order to improve health.

We have developed actions that can be considered under seven broad topics:

1. **Monitoring and other core statutory duties:** maintaining monitoring networks is critical for understanding where pollution is most acute, and what measures are effective to reduce pollution. There are also several other very important statutory duties undertaken by boroughs, which form the basis of action to improve pollution;
2. **Emissions from developments and buildings:** emissions from buildings account for about 15% of the Nitrogen Oxides (NO_x) emissions across London so are important in affecting Nitrogen Dioxide (NO₂) concentrations;
3. **Public health and awareness raising** increasing awareness can drive behavioural change to lower emissions as well as to reduce exposure to air pollution;
4. **Delivery servicing and freight:** vehicles delivering goods and services are usually light and heavy-duty diesel-fuelled vehicles with high primary NO₂ emissions;

¹ Environmental equity, air quality, socioeconomic status and respiratory health, 2010.

² Air quality and social deprivation in the UK: an environmental inequalities analysis, 2006.

³ Defra. Air Pollution: Action in a Changing Climate, March 2010

5. **Borough fleet actions:** our fleet includes light and heavy-duty diesel-fuelled vehicles such as minibuses and refuse collection vehicles with high primary NO₂ emissions. Tackling our own fleet means we will be leading by example;
6. **Localised solutions:** these seek to improve the environment of neighbourhoods through a combination of measures; and
7. **Cleaner transport:** road transport is the main source of air pollution in London. We need to incentivise a change to walking, cycling and ultra-low emission vehicles (such as electric).

Within the above categories the Greater London Authority (GLA) have identified 9 key priorities that all London Boroughs should be focussing on in addition to other air quality measures. Our priorities are summarised as follows:

1. Enforcing the Non-Road Mobile Machinery (NRMM) Low Emission Zone.
2. Promoting and enforcing Smoke Control Zones.
3. Promoting and delivering energy efficiency retrofitting projects in workplaces and homes.
4. Supporting alerts services such as Airtex and promoting the Mayor's air pollution forecasts.
5. Reducing pollution in and around schools and extending school audits to other schools in polluted areas.
6. Installing Ultra-Low Emission Vehicle (ULEV) infrastructure.
7. Improving walking and cycling infrastructure: we will build on the work already undertaken in relation to encouraging cycling and walking.
8. Regular Car Free days/temporary road closures in high footfall areas.
9. Reducing emissions from Council fleets

To achieve these priorities and actions we will work in partnership across the Council with neighbouring authorities and with partners such as the GLA to effectively use the following local levers to tackle air quality issues within our control including:

- i. delivering transport projects through the Local Implementation Plan (LIP).
- ii. implement joint working with public health professionals.
- iii. to continue to utilise the planning system to drive the air quality agenda via conditions and enforcement where appropriate.
- iv. to encourage the use of lower emission vehicles by the Council, businesses and residents.
- v. measures at a wider scale and investigate options to make efficient use of resources by delivering joint actions, such as the London wide NRMM and Idling projects.

We have worked hard to engage with stakeholders and communities who can make a difference to air quality in the borough. We would like to thank all those who have worked with us in the past and we look forward to continued partnership (as well with new partners) as we deliver this new action plan over the coming years.

We recognise that there are a large number of air quality policy areas that are outside of our influence (such as Euro standards, national vehicle taxation policy, taxis and buses), and so we will continue to work with and lobby regional and central government on issues beyond Haringey's influence.

RESPONSIBILITIES AND COMMITMENT

This AQAP was prepared by the Haringey Council's Regulatory Services – Pollution Team with the support and agreement of the following officers and departments:

Role/Team/Department	Officer Name
• Pollution Officer- Lead	Dr Eliane Foteu Madio
• Sustainable Transport Group Manager	Peter Boddy
• Transport Planner	Neil Goldberg
• Active Travel and Health Officer/Smarter Travel	Keeble Andrea
• Head of Carbon Management	Joe Baker
• Health in All Policies Officer	Marlene D'Aguilar
• Commercial Environmental Health Manager	Felicia Ekemezuma
• Commissioning Manager - Active Communities	Zoe Robertson
• Regulatory Services Manager, Community Safety & Enforcement	Gavin Douglas
• Regeneration Manager	Emily Read
• Community Safety, Enforcement & Waste Manager, Commissioning & Client	Ian Kershaw
• Strategic Procurement	Michael Molony
• Assistant Director of Planning	Emma Williamson
• Director of Public Health	Dr Will Maimaris
• Tree & Nature Conservation Manager	Alex Fraser

This AQAP has been approved by:

Name of Council member	Name	e-signatures [To be inserted]	Date [To be inserted]
• Interim Director of Public Health	Dr Will Maimaris		
• Assistant Director of Planning	Emma Williamson		
• Director of Environment & Neighbourhoods,	Stephen McDonnell		

This AQAP will be subject to an annual review, appraisal of progress and reporting to Directors of Planning, Public Health and Environment & Neighbourhoods. Progress each year will be reported in the Annual Status Reports produced by Haringey Council, as part of our statutory London Local Air Quality Management duties.

If you have any comments on this AQAP please send them to Lead Officer - Pollution at:

Pollution, 1st Floor River Park House, 225 High Road, London N22 8HQ, Email: Pollution@haringey.gov.uk

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Abbreviations

AQAP	Air Quality Action Plan
AQMA	Air Quality Management Area
AQO	Air Quality Objective
BEB	Buildings Emission Benchmark
BP	Borough Plan
CAB	Cleaner Air Borough
CAZ	Central Activity Zone
EV	Electric Vehicle
GLA	Greater London Authority
LAEI	London Atmospheric Emissions Inventory
LAQM	Local Air Quality Management
LLAQM	London Local Air Quality Management
NRMM	Non-Road Mobile Machinery
PM ₁₀	Particulate matter less than 10 micron in diameter
PM _{2.5}	Particulate matter less than 2.5 micron in diameter
TEB	Transport Emissions Benchmark
TfL	Transport for London

Foreword

Please find below a joint statement of intent to work together to deliver the shared aims of improving air pollution from the undersigned Cabinet Member.

We are pleased to present Haringey's Air Quality Action Plan setting out measures to improve air quality in Haringey between 2019 and 2024. This Action Plan replaces the Council's second plan 2010-18, published in 2011.

Haringey is committed to making the borough a better place to live and work. Air quality affects everyone living and working in the borough and is therefore an integral part of this vision.

A number of initiatives are already in place to improve air quality both London-wide and at a local level and these are already working well. We will build on these initiatives to further encourage active travel, implementation of transport improvements, reduced emissions from new developments and reduced exposure for residents.

This Action Plan sets out how we will work together towards meeting national air quality objectives for nitrogen dioxide (NO₂) and Particulate Matter. We cannot achieve this alone, and we will be taking a partnership approach both across Haringey, with the adjoining boroughs and other external stakeholders.

Haringey has been awarded Cleaner Air Borough Status, which means that criteria under the following 6 themes must be met: (1) political leadership; (2) taking action; (3) leading by example; (4) using the planning system; (5) informing the public and (6) integrating air quality into the public health system. This Action Plan contributes to achieving these criteria and to ensuring that Haringey retains its Cleaner Air Borough **status**.

Name of Council member	Name	e-signature [To be inserted]	Date [To be inserted]
• Cabinet Member for Environment	Councillor Hearn		
• Interim Director of Public Health	Dr Will Maimaris		
• Assistant Director of Planning	Emma Williamson		
• Director of Environment & Neighbourhoods,	Stephen McDonnell		

Introduction

This report outlines the actions that Haringey will deliver between 2019-2024 in order to reduce concentrations of pollution, and exposure to pollution; thereby positively impacting on the health and quality of life of residents and visitors to the borough.

It has been developed in recognition of the legal requirement on the Local Authority to work towards air quality objectives under Part IV of the Environment Act 1995 and relevant regulations made under that part. It also meets the requirements of the London Local Air Quality Management statutory process⁴.

1. Summary of current air quality in Haringey Council

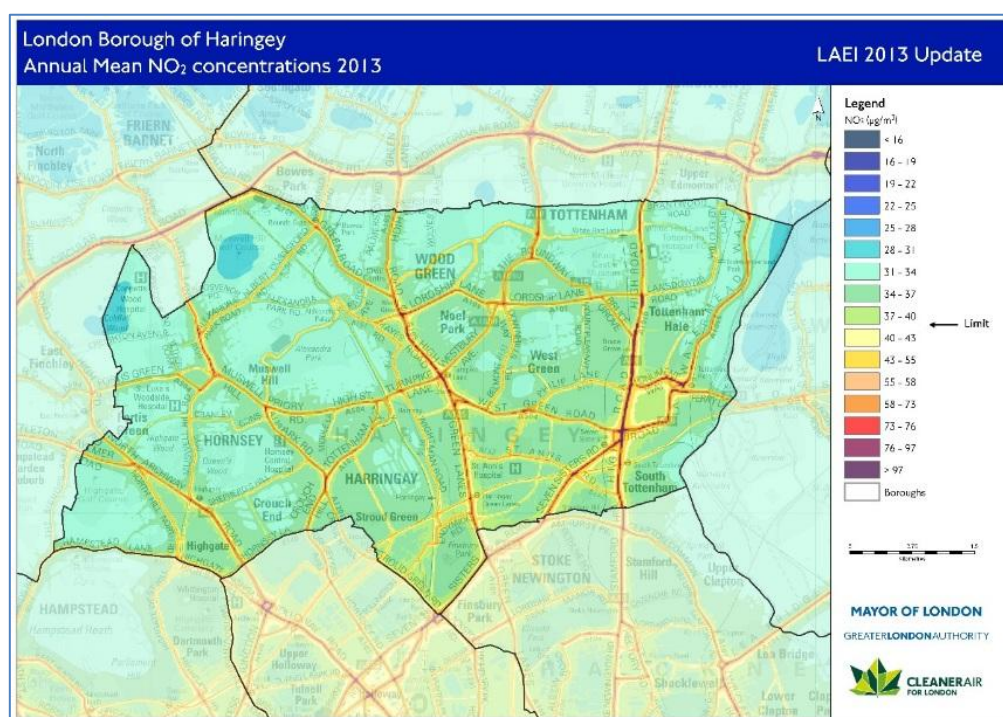
The UK Air Quality Strategy (AQS), released in July 2007, provides the overarching strategic framework for air quality management in the UK and contains national air quality standards and objectives established by the Government to protect human health. The AQS objectives considers EU Directives that set limit values which member states are legally required to achieve by their target dates.

Haringey is meeting all the national AQS objectives other than for the gas Nitrogen Dioxide (NO_2). Haringey is meeting the current objectives for Particulate Matter (PM_{10} and $\text{PM}_{2.5}$) but as this pollutant is damaging to health at any level, this remains a pollutant of concern.

LAEI model provides mapped annual mean NO_x , NO_2 , PM_{10} and $\text{PM}_{2.5}$ concentrations on a 20m x 20m basis for the whole of London from a base-year of 2013 for 2020, 2025 and 2030. The LAEI uses air pollution emission estimates from a wide range of sources including transport (including agriculture and long-range), industrial, domestic and commercial combustion, using the most up-to-date activity data, emission factors and projection factors.

Figure 1 shows the 2013 LAEI baseline annual mean NO_2 concentrations in Haringey. The changes in colours show how the pollution gradient changes, with distance, away from the heavier traffic.

The map shows that much of the borough has pollution levels below the target limit. The highest concentrations of NO_2 which breach the legal limits are found on the busiest main roads in the borough however pollution levels quickly reduce with distance from the pollution source.



⁴ LLAQM Policy and Technical Guidance. <https://www.london.gov.uk/what-we-do/environment/pollution-and-air-quality/working-boroughs>

Figure 1 Modelled map of annual mean NO₂ concentrations (from the LAEI 2013)

Figure 2 shows the 2013 LAEI baseline annual mean PM₁₀ concentrations in Haringey. Similarly, the contours (changes in colours) show how the pollution gradient changes, with distance, away from the heavier traffic. The concentrations PM₁₀ are generally low and below the recommended limit with the exception of major road where heavy traffic is expected.

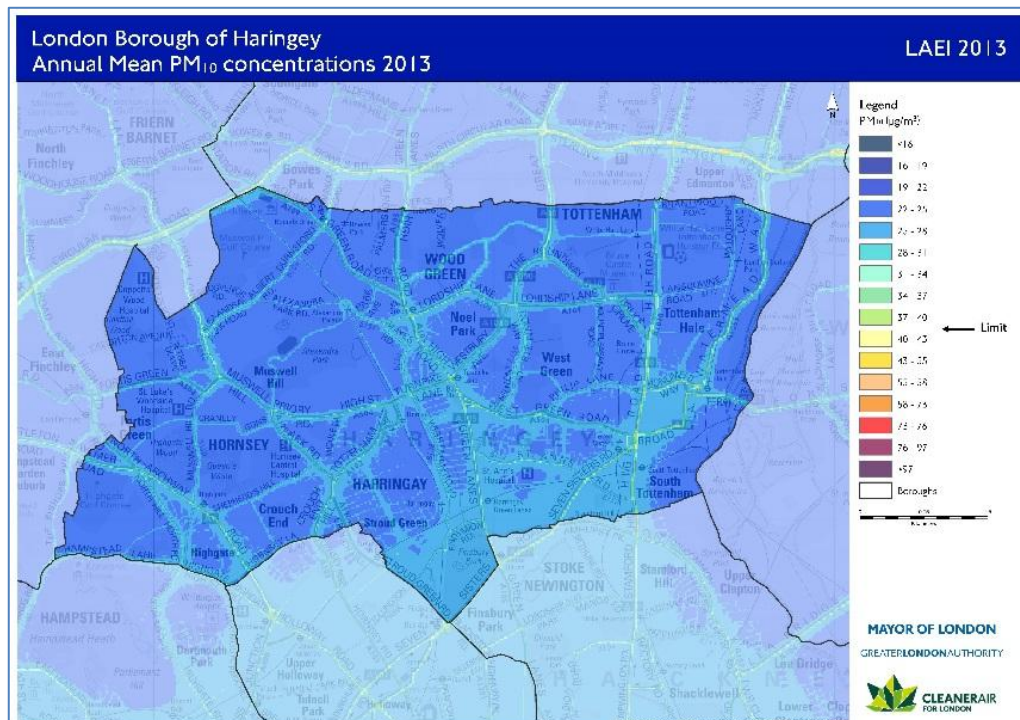


Figure 2 Modelled map of annual mean PM₁₀ (from the LAEI 2013)

Figure 3 shows the 2013 LAEI baseline annual mean PM_{2.5} concentrations in Haringey. There is no evidence that there is any safe level for PM_{2.5}. They are small enough that they penetrate deeply into the lungs and get stuck there, then cause negative impacts to human health. The map shows that higher concentrations of PM_{2.5} are recorded on major roads where heavy traffic occur.

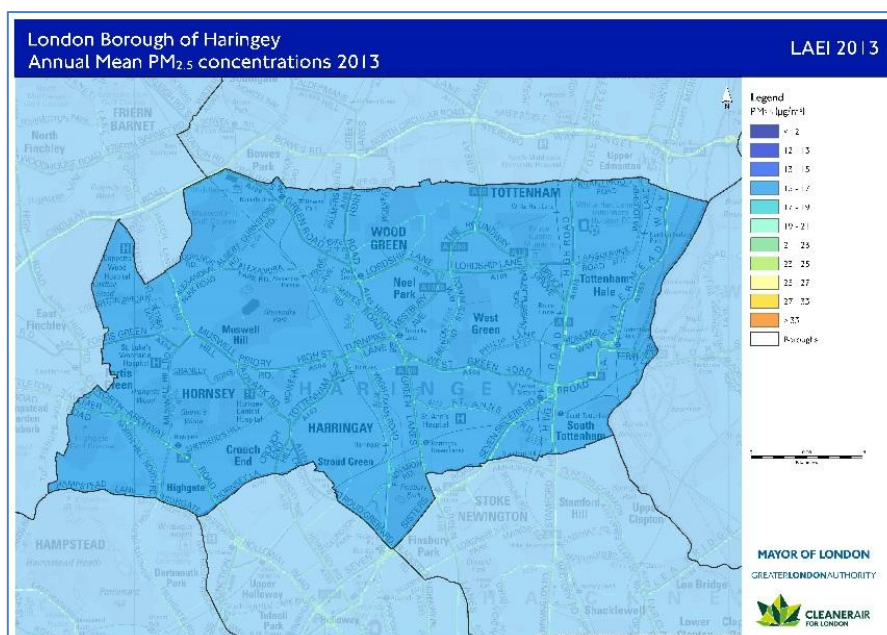


Figure 3 Modelled map of annual mean PM_{2.5} (from the LAEI 2013)

1.1. Air Quality Management Areas (AQMA) and Focus Areas

Haringey was declared an Air Quality Management Area in 2001.

The AQMA declared for nitrogen dioxide (NO₂; annual mean objective) and Particulate Matter (PM₁₀; 24-Hour mean objective), as both pollutants failed to meet the relevant air quality objectives. For PM₁₀, air quality objectives are now largely being achieved, but there are still widespread exceedances of NO₂, particularly along busy and congested roads. Haringey also has a formal responsibility to work towards the national requirement for reductions of PM_{2.5}.

Current NO₂ diffusions tube locations and results of the 2018 air quality monitoring round are shown in Figure 4.

An air quality 'Focus Area' is a location that has been identified by the GLA as having high levels of pollution and human exposure. There are eight focus areas in the borough. In addition, through air quality modelling work commissioned by the Council, a further seven hotspot areas at these locations have been identified. Haringey's annual summary report available on our website show the actions taken in Focus Areas. Further actions are proposed as part of this AQAP.

The current air quality Focus Areas are included on the maps (Figures 5, 6, 7) of pollutant concentrations across Haringey.

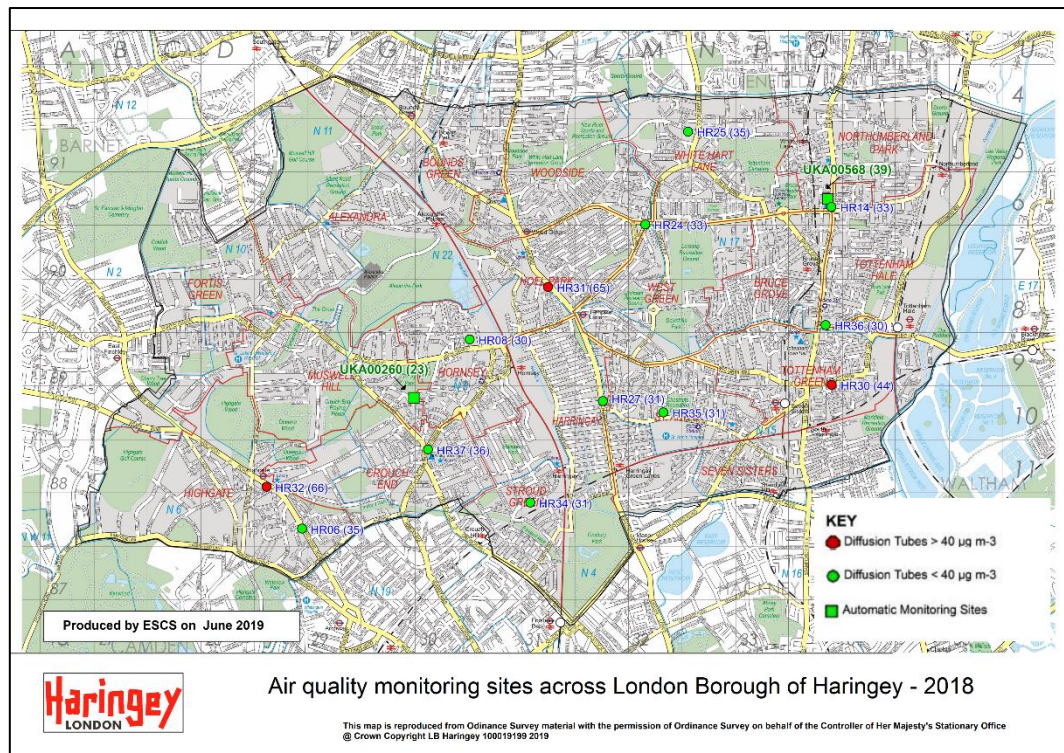


Figure 4 above Map of monitoring locations and annual mean NO₂ concentrations for 2018.

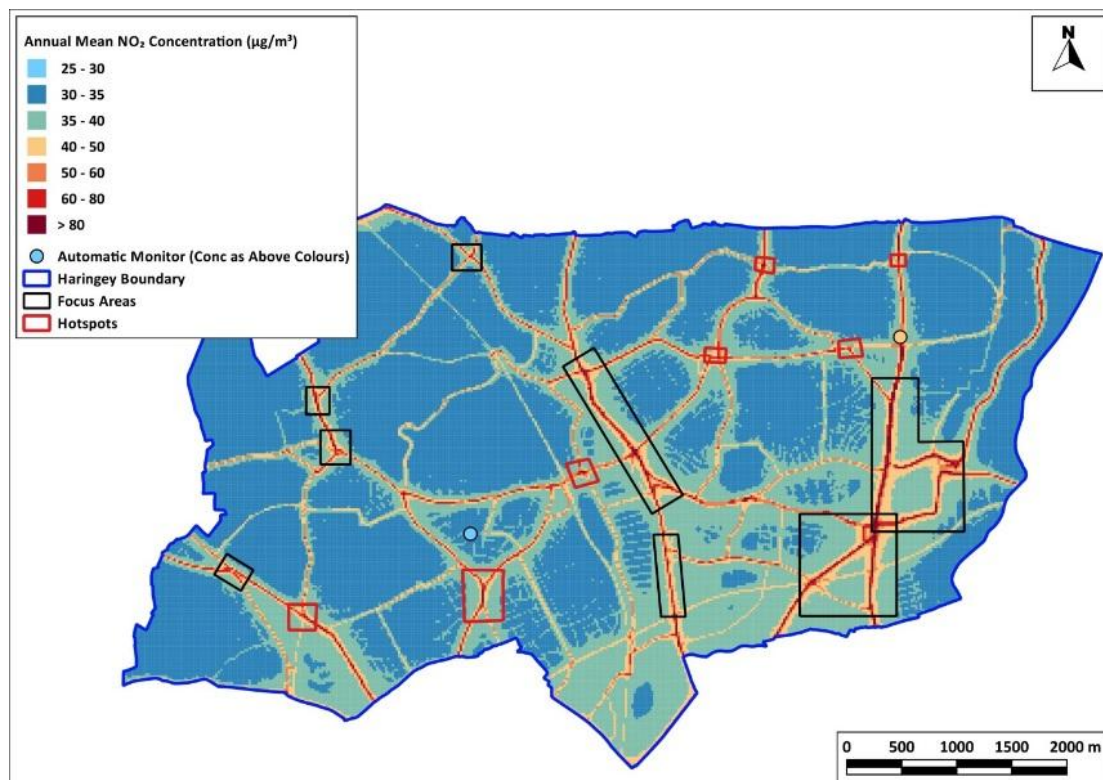


Figure 5 Modelled map of annual mean NO₂ concentrations including monitoring locations and Air Quality Focus Areas (from the LAEI 2013)

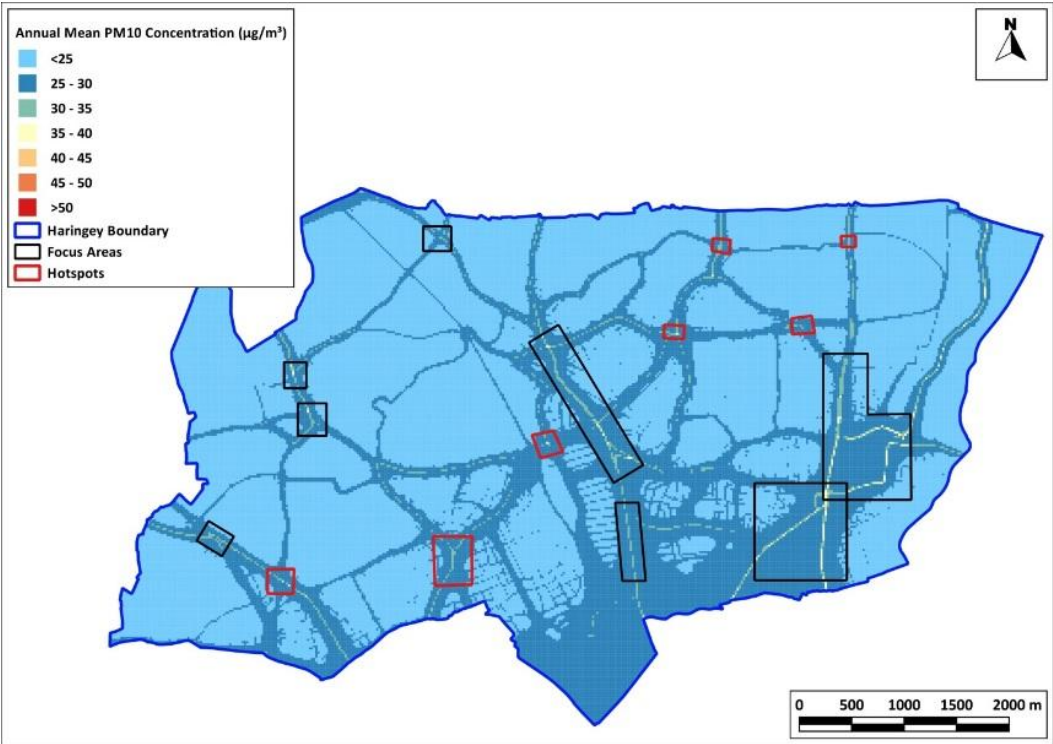


Figure 6 Modelled map of annual mean PM₁₀ including Air Quality Focus Areas (from the LAEI 2013)

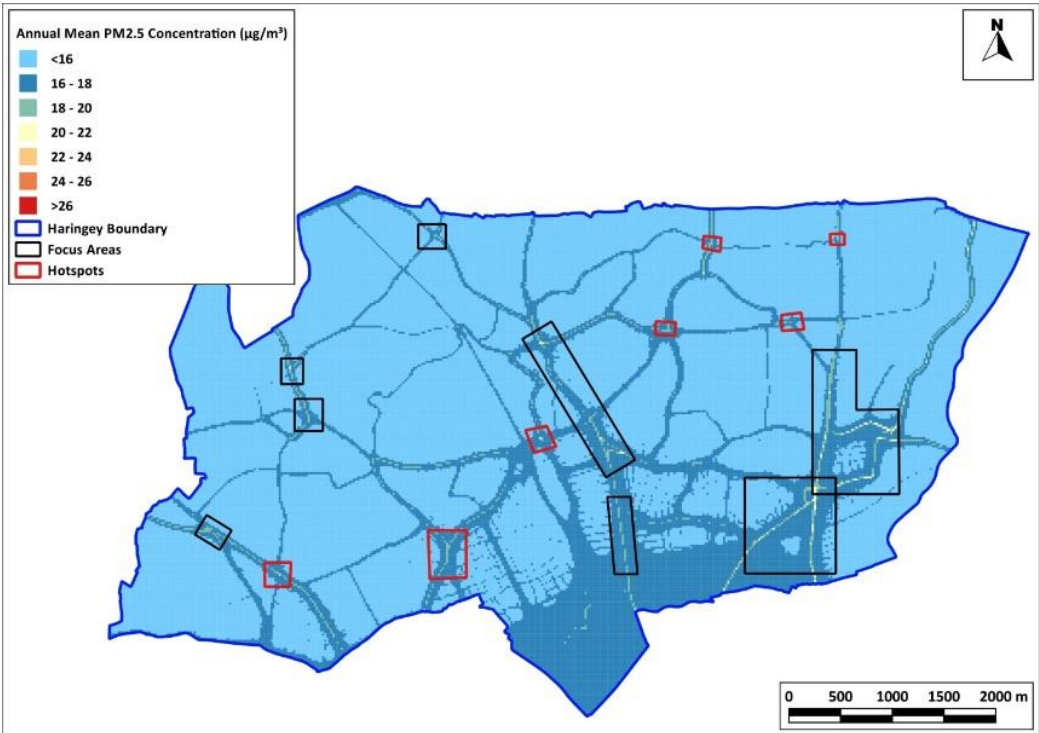


Figure7 Modelled map of annual mean PM_{2.5} including Air Quality Focus Areas (from the LAEI 2013)

1.2. Sources of Pollution in London Borough of Haringey

Pollution in Haringey comes from a variety of sources. This includes pollution from sources outside of the borough, and, in the case of particulate matter, a significant proportion of this comes from outside of London and even the UK.

Of the pollution that originates in the borough the main sources of NO₂ are road transport and domestic and commercial gas sources (i.e. boilers) (Figure 8a). In relation to transport emissions (Figure 8b), diesel vehicles predominate. The main sources of particulate matter are road transport, resuspension, and Non-Road Mobile Machinery (Figure 9a and Figure 9b).

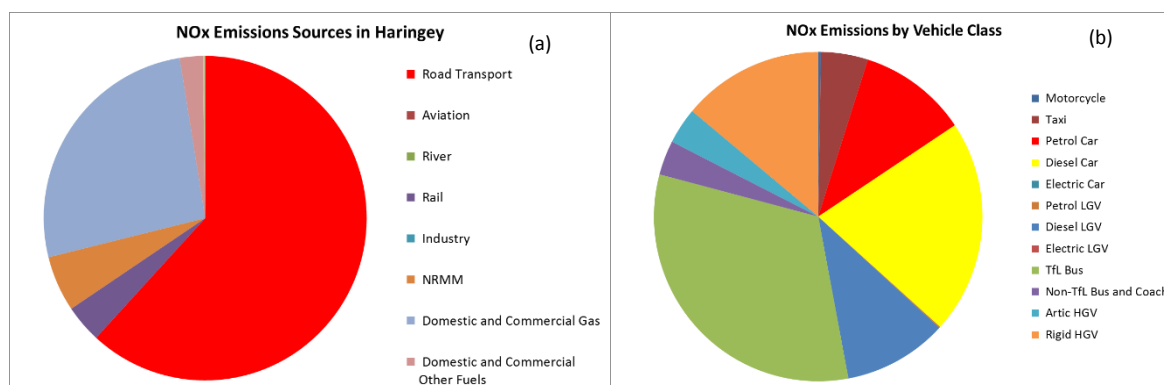


Figure 8 NOx Emissions by source(a) and vehicle type(b) (from the LAEI 2013)

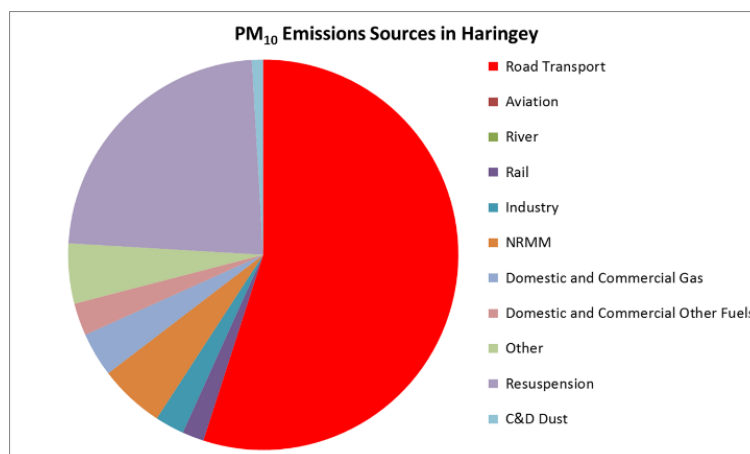


Figure 9a PM₁₀ Emissions by source (from the LAEI 2013)

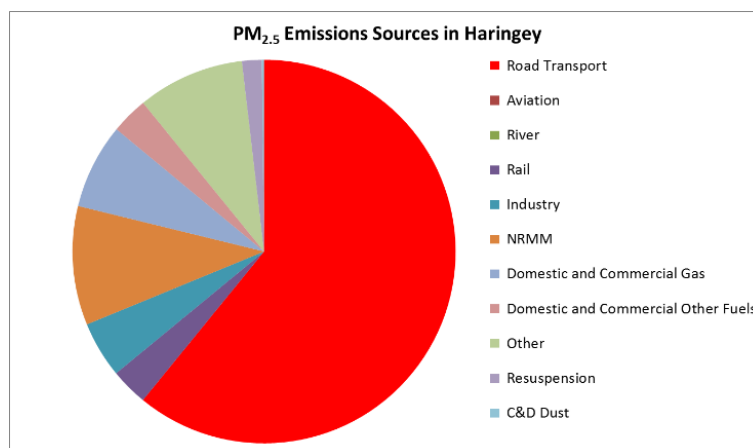


Figure 9b PM_{2.5} Emissions by source (from the LAEI 2013)

Emissions from restaurants, takeaways and canal boat have been specifically identified as additional sources of air pollution within Haringey that will be tackled by this Action Plan.

2. London Borough of Haringey's Air Quality Priorities

Borough Plan⁵ - the Council's Four-year plan sets out a vision for how we want to support a healthier and better quality of life for Haringey residents and businesses. It sets out the key priorities, all of which are designed to have a major positive impact on the quality of people's lives. In order to deliver on these targets, we will work closely with other organisations, and support residents to act.

This Action Plan has been developed in tandem with the current corporate priorities via the Borough Plan. The priorities are:

Priority 1 - Housing - a safe, stable and affordable home for everyone, whatever their circumstances,

Priority 2 - People - our vision is a Haringey where strong families, strong networks and strong communities nurture all residents to live well and achieve their potential,

Priority 3 - Place - a place with strong, resilient and connected communities where people can lead active and healthy lives in an environment that is safe, clean and green,

Priority 4 - Economy - a growing economy which provides opportunities for all our residents and supports our businesses to thrive and

Priority 5 - Your Council - the way the council works.

With the Borough Plan we have also published Equality Principles, Partner Statements and Key Pledges for our relationships with Residents, Business and the Voluntary and Community Sector.

A series of engagement workshops were held during February and March 2017, and in 2018 as part of the development of AQAP for members of the public, local community groups and Council departments. The aim of the workshops was to raise awareness of local air quality issues and to listen to concerns about air quality from the whole community. The following issues were raised and taken into consideration when drafting this plan:

⁵ <http://www.minutes.haringey.gov.uk/documents/s106970/BP%20-%20Cabinet%20Report%20-%20Feb%202019.pdf>

- Opportunities for partnership working across Council departments
- Air quality monitoring
- Enforcement
- Planning
- Borough fleet and procurement
- Cycling and walking
- Encourage low emission vehicles for deliveries and via parking policies.

Cleaner Air Borough Status was awarded to Haringey by the Mayor of London in recognition of the efforts made via the AQAP towards tackling air pollution. This status has enabled the Council to bid for additional air quality funding from the GLA. Improving air quality and maintaining Cleaner Air Borough Status by achieving our AQAP actions is a critical priority for Haringey.

3. Development and Implementation of London Borough of Haringey's AQAP

3.1. Consultation and Stakeholder Engagement

We have worked with other Local Authorities, agencies, businesses and the local community in developing/updating the action plan to improve local air quality. Schedule 11 of the Environment Act 1995 requires Local Authorities to consult the bodies listed in Table 3.1. In addition, we have undertaken the following stakeholder engagement:

- An online questionnaire which was available in accessible formats, launched on the Council's website on the 28th of June;
- Information leaflets and questionnaires were available at all major libraries;
- The consultation was publicised in local press such as Haringey & Enfield Independent and Haringey People.
- All schools, colleges and interest groups were emailed the questionnaire directly
- 4 public, 2 members and 2 specialist groups workshops were delivered to provide opportunities for further stakeholder engagement.
- Regular tweets were made to encourage attendance of workshops and completion of questionnaire

3.2. The key statutory consultees were also consulted directly by email.

A summary of the response to our consultation stakeholder engagement is given in Appendix A. Detailed responses are presented in a separate report available on the council's website or on request.

Table 3.1 Consultation Undertaken

Answer	Consultee
Yes	The Secretary of State
Yes	The Environment Agency
Yes	Transport for London and the Mayor of London (who will provide a joint response)
Yes	All neighbouring local authorities
Yes	Other public authorities as appropriate
Yes	Bodies representing local business interests and other organisations as appropriate

3.2 Steering Group

An air quality steering group comprising representatives from all relevant departments has been set up to develop this updated AQAP. The group have been meeting regularly to develop the plan. In addition, one to one meeting has been held with steering group members to discuss and agree certain actions. The steering group will continue to meet periodically once the plan is in place in order to monitor, review and drive the Action Plan forward.

Monthly Carbon Management and Air Quality One to One Meetings are held with the Cabinet Member for Environment.

The following meetings have been held to discuss the AQAP:

Table 3.2 Summary of Meetings Held to Discuss the AQAP

Meetings date	Meetings Time	Title	Locations
2017	Various	Stakeholder workshops held in 2017	Various
13/12/17	2.00 pm	AQAP Steering Group Meeting	Alexandra House
18/12/17	12.30pm	AQAP Presentation to Priority 4 Board	River Park House
10/1/18	-	AQAP Steering Group Meeting	Alexandra House
14/2/18	-	AQAP Steering Group Meeting	River Park House
15/2/18	10.00am	AQAP/Planning Development Management	River Park House
14/3/18	2.00pm	AQAP Steering group	River Park House
21/3/18	3.00pm	AQAP Stakeholder Engagement Workshop	Lordship recreation Community Hub
23/3/18	2.00pm	AQAP/Transport Planning – Transport Strategy	River Park House
11/4/18	10.00am	AQAP Stakeholder Engagement Feedback Session	River Park House
11/4/18	2.00pm	AQAP/Comms Consultation Plan	River Park House
18/4/18	10.30am	AQAP/Procurement	River Park House
25/4/18	11.00am	AQAP/Low Emission Vehicle Strategy	River Park House
25/4/18	3.00pm	AQAP/Public Health	River Park House
2/5/18	10.00am	AQAP Steering Group	Haringey Civic Centre
9/5/18	4.30pm	AQAP/Canals	River Park House
8/6/18	10.00am	AQAP/Sustrans	River Park House N22
13/6/18	2.00pm	AQAP Steering Group	Level 1 River Park House N22
14/6/18	9.30am	AQAP/Regeneration	River Park House N22
15/6/18	4.30pm	AQAP/School	River Park House
20/6/18	2.00pm	AQAP/ Service Head Progress Review	River Park House
28/6/18	11.00am	AQAP/Commissioning and	River Park House

Meetings date	Meetings Time	Title	Locations
		Client Services	
2/7/18	9.30am	AQAP/ Service Head Progress Review	River Park House
4/7/18	11.15am	AQ and Zero Carbon Portfolio 1:1	River Park House
1/8/18	11.45am	AQ and Zero Carbon Portfolio 1;1	River Park House
23/8/18	2.00pm	AQAP/Public Health	River Park House
5/9/18	2.30am	AQ and Zero carbon Portfolio 1:1	River Park House
13/9/18	9.30am	Draft AQAP presentation to Corporate Board	River Park House
21/9/18	2.00pm	AQAP/Zero Carbon 1:1	River Park House
8/11/18	2.00pm	AQAP/Public Health	River Park House
14/11/18	2.00pm	AQAP/Passenger Transport	River Park House
10/01/19	10.00am	AQAP Steering Group	River Park House
11/02/19	10.00am	AQAP Steering Group	River Park House
08/05/19	2.00pm	AQAP/ Transportation and Highways, /Development Control/Transport and planning policy	River Park House
13/05/19	2.30pm	AQAP/ Regeneration & Park	River Park House
15/05/19	2.00pm	AQAP/ Public Health & Carbon Management	River Park House
29/05/19	4:00pm	Haringey Transport Forum	Haringey Civic Centre
10/06/19	2:00pm	Procurement/Active Communities & Health	River Park House
11/06/19	9:00am	Public Workshop	Enterprise Centre 639 High Road
19/06/19	7:00pm	Climate Change Forum	Haringey Civic Centre
24/06/19	6:30pm	Members workshop	Haringey Civic Centre
25/06/19	9:00am	Public Workshop	Hornsey Library
28/06/19	9:00am	Public Workshop	Wood Green Library
29/07/19	7:00pm	Members Workshop	Haringey Civic Centre

4. Action Plan Table

Table 4.1 shows the London Borough of Haringey AQAP (2019-2024). It contains:

- a list of the actions that form part of the plan;
- the responsible individual and departments/organisations who will deliver this action;
- estimated cost to the council;
- expected benefit in terms of emissions and concentration reduction;
- the timescale for implementation
- the outputs, targets and Key Performance Indicators
- how progress will be monitored.

4.1. Evaluation Approach

Within 4.1 the actions are evaluated in relation to their expected impact on:

- air quality (i.e. reduction in emissions or concentrations);
- cost; and
- timescale for implementation.

4.2. Air Quality Impact

Air quality impacts have been classified to represent 'low' to 'high' impact. The higher the impact, the greater the improvement in air quality, i.e. the greater the reduction in NO₂ and/ or PM₁₀ concentrations. For each Action, the expected reduction in annual mean NO₂ and/ or PM₁₀ concentrations has been determined based on professional judgement, drawing on experience gained from other studies, as well as the LLAQM Borough Air Quality Action Matrix as published by the GLA. The following classification scheme has been used:

- **Low:** imperceptible (a step in the right direction). Improvements unlikely to be detected within the uncertainties of monitoring and modelling;
- **Medium:** perceptible (a demonstrable improvement in air quality). An improvement of up to 5% of the objective (2 µg/m³), which could be shown by a modelling scenario. Improvement is not likely to be shown by monitoring due to confounding factors of the weather; and
- **High:** significant. Improvement of more than 5% of the objective (2 µg/m³). Can be clearly demonstrated by modelling or monitoring (a significant improvement is likely to be delivered by a package of options rather than by a single intervention).

4.3. Cost

The implementation of the measures set out in this Action Plan are dependent on the resources required to deliver the programme. In line with current London Technical guidance, it is not necessary to carry out a detailed cost-benefit analysis. Rather the aim is to provide a broad indication of costs so that the proposed measures can be ranked according to the cost and the expected improvement to air quality. Costs are represented as follows:

- **'Very Low'** cost is taken to be £10K and under;
- **'Low'** cost is taken to be £10 - £50K;
- **'Medium'** cost is £50K - 500K;
- **'High'** cost is £500K - £2 million; and
- **'Very High'** cost is over £2 million.

4.4. Timescale

The timescale for the implementation of measures have been considered using the following classifications:

- Short-term relates to those measures that can be implemented within 1-2 years;
- Medium-term relates to those implemented within 2-5 years;
- Long-term options are those, which are 6+ years.

Table 4.1 Air Quality Action Plan 2019-24 Table of Measures

The actions have been grouped into seven categories: Monitoring and core statutory duties; Emissions from developments and buildings; Public health and awareness raising; Delivery servicing and freight; Borough fleet actions; Localised solutions; and Cleaner transport. This table should be read in conjunction with the below listed documents⁶. Traffic and parking related improvement measures are detailed in Transport Strategy (March 2018) and the Parking Strategy which will be published in due course.

Action category	Action ID	Action name and description	Responsibility	Cost (to Borough)	Expected emissions/concentrations benefit	Timescale for implementation	Performance Management and Measures (Outputs, Targets and KPIs)	Further Information
Monitoring and other core statutory duties	1	a) With the support of all relevant teams, monitoring to include maintaining the borough's two automatic and 13 NO _x diffusion tube monitors across the borough and expand monitoring networks, especially around schools.	Pollution Development Management.	Low – medium	No emissions/concentrations benefit but critical in terms of understanding emissions and concentrations and the impact of action taken.	This action is ongoing and there is a target to install 20 new diffusion tube monitors by 2020.	<u>Outputs/Measures/Targets</u> <ul style="list-style-type: none"> • Outputs to be presented in our Annual Summary Report (ASR) available on our website. • Continue to monitor via 2 automatic monitoring stations and via 13 NO_x diffusion tubes. • Reintroduction of PM10 & 2.5 monitoring if evidence shows there is a need. • Increase the number of diffusion tube by more than 50% • Review diffusion tube locations periodically to reflect changes in the environmental settings • Feasibility of implementing additional monitoring sites e.g. Wood Green, B/LEN 	<p>The council will continue looking for alternative sources of funding to implement the measures listed below where justified.</p> <ul style="list-style-type: none"> • Installation of low cost NO₂ monitors in each school playgrounds and at hotspots areas including Green Lanes for example; • Installation of more monitoring to capture seasonal variations of air quality to include the worst-case scenario during winter; • inclusion of CO₂ and PMs monitoring in our monitoring plan • Co-operation with other GLA London programmes (e.g. Breathe

6

- Parks and Open Spaces Strategy available at <https://www.haringey.gov.uk/libraries-sport-and-leisure/parks-and-open-spaces/open-space-strategy>
- Ultra-Low Emission Vehicle Action Plan available at https://www.haringey.gov.uk/sites/haringeygovuk/files/draft_ultra_low_emission_vehicle_action_plan_-_full_document.pdf
- Parking Permits Strategy (Ongoing)
- Transport Strategy available at https://www.haringey.gov.uk/sites/haringeygovuk/files/haringey_transport_strategy_2018.pdf
- Transport Policy Statement (ongoing)
- Crouch End Liveable Neighbourhoods Project available at <https://www.haringey.gov.uk/parking-roads-and-travel/roads-and-streets/public-realm-improvements/liveable-crouch-end>
- Local Plan: Development Management DPD available at <https://www.haringey.gov.uk/planning-and-building-control/planning/planning-policy/local-plan/local-plan-development-management-dpd>
- School Street action plan is due in March 2020

Action category	Action ID	Action name and description	Responsibility	Cost (to Borough)	Expected emissions/concentrations benefit	Timescale for implementation	Performance Management and Measures (Outputs, Targets and KPIs)	Further Information
							<ul style="list-style-type: none"> Explore opportunities to increase monitoring e.g. at schools Diffusion tubes replacement according to published calendar Require monitors to be placed around large scale developments as part of planning process Submit monitoring data to Kings College for the LAQN as well as DEFRA's network to make available detailed map of the air quality across Haringey and London. Publish moderate or high air pollution levels on Clear Channel UK digital display signs within the borough. <p>KPIs</p> <ul style="list-style-type: none"> Over 90% data capture. Produce an inventory of the number of monitoring sites to fit the target and regularly review as appropriate. Maintain existing networks (at a minimum) Potentially use of sensors to monitor the effectiveness of interventions (BP) Publish data on digital display signs in Wood Green by end of 2019. Roll service out to other areas by March 2020. 	<ul style="list-style-type: none"> London and Kings College London 'toxic air supersite') where necessary; Tracking Government research into emissions listed in Clean Air Strategy 2019, for instance from brakes and tyres in due course.
		b) Complete and submit Annual Status Reports on time.	Pollution	Low – medium	Allows for a much deeper understanding of annual trends across the borough for better management.	Months/Years	<p>Outputs/Measures/Targets:</p> <ul style="list-style-type: none"> Content and context of the document found to be satisfactory following a review by GLA/DEFRA to meet submission deadline. Annual publication on website on target deadline <p>KPIs: Submission and review following comments on the report by GLA/DEFRA.</p>	

Action category	Action ID	Action name and description	Responsibility	Cost (to Borough)	Expected emissions/concentrations benefit	Timescale for implementation	Performance Management and Measures (Outputs, Targets and KPIs)	Further Information
		c) Update AQAPs every five years at a minimum and follow LLAQM guidance when doing this; check/amend AQMA's as required.	All	Low – medium		Five years	Outputs/Measures/Targets <ul style="list-style-type: none"> Content and context of the Air Quality Action Plan (AQAP) found to be satisfactory following a review by GLA/TFL meet submission deadline Annual publication on website on target deadline AQAP action table kept up to date annually KPIs: <ul style="list-style-type: none"> Annual review of AQAP and action table Publish new AQAP by 2024 	

Action category	Action ID	Action name and description	Responsibility	Cost (to Borough)	Expected emissions/concentrations benefit	Timescale for implementation	Performance Management and Measures (Outputs, Targets and KPIs)	Further Information
Emissions from developments and buildings	2	a) Investigate the potential for larger development areas to proactively assess air quality impacts cumulatively	Development Management Regeneration Pollution	Low	Low in short term, but potentially medium in longer term	Ongoing	Outputs/Measures/targets: <ul style="list-style-type: none"> Develop guidance for assessment of cumulative air quality impacts Ensure consistent conditions applied Ensure that cumulative assessment has been successfully undertaken in large development where necessary. Ensure that air quality assessment is dealt with adequately in planning applications KPIs: <ul style="list-style-type: none"> Guidance published by the end of 2020 Development of scheme to monitor the effects of the guidance by end of 2021 Produce statistics on Cumulative assessment of air quality around larger development using the recommended guidance April 2022 	
		b) Ensuring emissions from demolition and construction are	Development Management/ Pollution/Enforcem	Very Low to Low	PM Medium-High	Short	Outputs/Measures/Targets: <ul style="list-style-type: none"> Continue to ensure that construction and demolition method statements are referred to pollution team for review at 	Planning condition to include where appropriate: <ul style="list-style-type: none"> Air Quality assessment Management and Control of

Action category	Action ID	Action name and description	Responsibility	Cost (to Borough)	Expected emissions/concentrations benefit	Timescale for implementation	Performance Management and Measures (Outputs, Targets and KPIs)	Further Information
		minimised	ent Response		Localised benefits likely but not quantifiable		<p>the discharge stage.</p> <ul style="list-style-type: none"> Continue to ensure all air quality conditions are discharged prior to development starting/occupation Continue to require Air Quality Dust Management Plans (AQDMP) by Condition for major developments Compile Annual Status report (ASR) and submit to GLA/DEFRA Continue to ensure that construction related complaints (>10 units) are referred for enforcement Log of Complaints and enforcement Register of enforcement action taken <p>KPIs:</p> <ul style="list-style-type: none"> Ensure 100% of all major planning applications have NRMM and AQDP conditions/ air quality and dust enforcement actions (BP) Reduction in air pollution complaints from construction sites over the course of the AQAP year on year Overall reduction of LAEI 2013 construction related PM10 & 2.5 emissions 	<p>Dust then registration Considerate Constructors Scheme</p> <ul style="list-style-type: none"> NRMM and plant to be used on the site of net power between 37kW and 560 kW has been registered at http://nrmm.london/. Asbestos management
	3	Ensuring enforcement of non-road mobile machinery (NRMM) air quality policies	Pollution Development Management		<p>NOx and PM</p> <p>Medium-High</p> <p>Localised benefits likely but not quantifiable</p>	<p>Short</p> <p>Until 2022</p>	<p><u>Outputs /Measures/targets</u></p> <ul style="list-style-type: none"> Statistic to be reported in our Annual Status Report including number of applications with NRMM conditions Participate in Pan London NRMM project Carry out enforcement and monitoring as prescribed by the project Log of enforcement visits to be kept Increase inspection on sites with NRMM requirements and keep a register All major planning applications conditioned with NRMM requirements Publicise role to make site operators aware that details of enforcement will 	<ul style="list-style-type: none"> Haringey and 27 other LAs successfully bid for funding from the MAQF to undertake auditing, enforcement and monitoring of major development sites.

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							<p>be within initial application advisory documentation</p> <ul style="list-style-type: none"> Disseminate NRMM literature to site managers during site visits as part of London wide NRMM project <p>KPIs:</p> <ul style="list-style-type: none"> Aim for 100% of, all major application to be registered at http://nrmm.london/. Monitor percentage of development sites that comply to the NRMM requirements and proportion of relevant sites inspected each year Percentage of relevant development sites that are subject to planning condition requiring compliance with the NRMM LEZ Number or proportion of events or roadworks required by licence or contract to comply with the NRMM LEZ Reporting on the collection and spend of section 106 contributions on construction management issues in the annual statement Reductions in the number of complaints associated with construction machinery 	
	4	<p>Reducing emissions from CHP.</p> <p>Enforcing CHP air quality policy. Ensure smaller developments use ultra-low NO_x Boilers.</p>	<p>Development Management</p> <p>Pollution</p> <p>Carbon Management</p>	Very Low to Low	<p>Medium-High</p> <p>Localised benefits likely but unquantifiable</p>	Short	<p>Outputs/Measures/Targets</p> <ul style="list-style-type: none"> ASR and planning portal including number of conditions requiring high efficiency boilers. Condition requiring band B emissions standards of CHP in Air Quality management Area (AQMA). Condition requiring ultra-low NO_x boilers Planning to refer relevant discharge of conditions to pollution. 	

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							<ul style="list-style-type: none"> A database/register of all sites with CHP will be kept. Log of applications where CHP and biomass conditions apply with 100% Target Continue to review air quality assessments/energy strategies to ensure compliance Investigate setting a requirement for evidence of maintenance of CHP combustion plant. <p>KPIs: indicator will be obtained through monitoring the following:</p> <ul style="list-style-type: none"> Number of secondary heat sources integrated into heat networks Number of existing combustion-based CHP engines removed/replaced with cleaner, lower carbon heat sources 	
	5	Enforce Air Quality Neutral (AQN) policy	Development Management Pollution	Very Low to Low	Medium Localised benefits likely but unquantifiable	Short	<p>Outputs/Measures/Targets: ASR and planning portal</p> <ul style="list-style-type: none"> Disseminate Information to support planners in understanding on site mitigation options Ensuring conditions and requirements are enforced and monitored. Agreeing standard planning conditions to require compliance with air quality neutral standards and submission of details prior to occupation for all developments. Apply Air Quality Positive standards where appropriate (New London Plan) AQN assessments submitted with Major applications. Enforcement via planning process – i.e. via approval of plans discharge of conditions Knowledge sharing with planners, so that they can assess basic compliance in cases that are otherwise non-contentious for air quality. Log of applications where AQ Neutral/positive conditions applied, and benchmarks achieved Target 100% 	

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							KPIs: <ul style="list-style-type: none"> Increase in number of development proposals meeting the air quality neutral standards Annual Status Report submitted on time 	
	6	Ensuring adequate, appropriate, and well-located green space and infrastructure is included in new and existing developments.	Analyst & Systems Team Development Management	Very Low to Low	Low	Short to medium	Outputs/Measures/Targets: <ul style="list-style-type: none"> Regularly produce map of green space. Area of green space incorporated into new developments Pursue "Healthy Streets" in areas of development and estate renewal Apply London Plan Policy principles for Increasing Green Space in development opportunities Access to information on suitable greenery Implementing a mechanism for air quality and biodiversity officers to jointly comment on green infrastructure Recording and benchmarking the levels of green infrastructure in developments and setting targets to improve on levels and quality of green infrastructure provided. Requirements for green space set out within the Haringey Development plan Document (DPD DM20) Ensuring that exposure in amenity spaces is considered at the design stage and as part of the Air Quality assessment for new development and redevelopment proposals <p>KPIs: The following parameters will be used to monitor progress:</p> <ul style="list-style-type: none"> Numbers of proposals or projects where green infrastructure is used or enhanced to provide low exposure walking and cycling routes Proportion of major planning applications where green amenity spaces are in areas of low exposure. 	

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							<ul style="list-style-type: none"> For stand-alone green infrastructure projects consider using exposure reduction targets as project KPIs 	
	7	a) Declaring Smoke Control Zones and ensuring they are fully promoted To include: an awareness campaign, engagement with suppliers, and active enforcement.	Pollution	Very Low to Low	Use literature published London-wide estimates.	Campaign initiated by March 2020	<u>Outputs/Measures/Targets:</u> <ul style="list-style-type: none"> Review and clarify the smoke control zone and send to cabinet Develop information packs and plan face to face meetings with residents and other members of the public. All fuel suppliers in the borough engaged, and 50% showing point of sale information about cleaner fuels. Residents engaged via 2 council newsletter articles, and 1 photo opportunity/press release with local papers. <u>KPIs:</u> <ul style="list-style-type: none"> Estimated reach of awareness campaigns Number of suppliers engaged Increased enforcement 	
		b) Ensuring that Smoke Control Areas are appropriately identified and fully enforced.	Pollution	Low – No additional cost	Low- Medium Localised benefits	Ongoing	<u>Outputs/Measures/Targets:</u> <ul style="list-style-type: none"> All complaints of dark smoke investigated within 5 working days by pollution/enforcement team as appropriate. Enforcement action taken where appropriate. Annual reports of smoke control areas within Haringey, enforcement actions taken and recommendations <u>KPIs:</u> <ul style="list-style-type: none"> Number of Enforcement visits/action 	
	8	Promoting and delivering energy efficiency and energy supply retrofitting projects in workplaces and	Carbon Management Homes for Haringey	Low Most schemes externally funded so	Low/medium	ongoing	<u>Outputs/Measures/targets:</u> <ul style="list-style-type: none"> Outputs from different program as detailed below for carbon management SAP scores from HfH and other housing sectors. ASR and planning. 	

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		homes through EFL retrofit programmes such as RE: FIT, RE: NEW and through borough carbon offset funds. to replace old boilers/top-up lost insulation in combination with other energy conservation measures.		low to neutral cost to council			<ul style="list-style-type: none"> Continue monitoring the before/after benefits Improve energy efficiency in Haringey's corporate buildings Review procurement policy regarding replacement boilers to introduce NOx emission standards for all council property stock for upgraded heating system Promoting the Minimum Energy Performance Regulation requirements to commercial and residential landlords on the Councils website and via Haringey's Home Finder Scheme and Private Sector Housing team at Landlord forums. Continue to deliver home improvements such as loft and roof insulation, energy efficient boilers, upgrades to communal boilers and double-glazed windows through Homes for Haringey major works programme. Promote energy efficiency to both council and private residential and commercial property owners/tenants. Facilitate the design and development of decentralised energy networks in Tottenham Hale, North Tottenham and Wood Green. Explore the opportunity to install clean renewable energy technologies in the Council's housing and commercial stock. Applying for new funding opportunities to encourage energy efficiency improvements in the borough. To maximise the opportunities to achieve zero carbon on-site and to collect carbon offsetting contributions. To finalise the priority projects for funding from the Councils carbon offsetting fund. Using it to deliver energy efficient projects with wider community benefit. <p>KPIs:</p> <ul style="list-style-type: none"> Reduce CO₂ emissions by 40% by 	

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			GLA GLA Carbon Management				2020 and being Zero-Carbon by 2050. <ul style="list-style-type: none"> No. of schemes using RE: FIT and RE: NEW. as the programme guarantees the amount of CO₂ emissions reduced. (GLA) Tracks the percentage of the boroughs social housing stock which has been updated through the RE: NEW scheme. (GLA) 	
	9	a) Installation of residential electric charge points within developments	Development Management Carbon management	Low to High Private funding may be an option	Low to Medium depending on uptake NO2 PM CO2	Short to medium term	<u>Targets:</u> <ul style="list-style-type: none"> Install additional EV charge points Wood Green Area Action Plan requires new parking spaces to have EV recharging points Encourage EV in new developments – via policy or guidance Consider development of guide for mitigation of new developments. Consider specific options in Tottenham regeneration areas Pursue as part of Neighbourhoods for the Future in Wood Green and roll out successful initiatives elsewhere in the borough <u>KPI</u> <ul style="list-style-type: none"> No. of rapid points provided within major developments 	Development Management Carbon management
		b) Master planning and redevelopment areas aligned	Development Management	Very Low to Low	Low- Medium	Ongoing	<u>Outputs/Measures/Target:</u> <ul style="list-style-type: none"> ASR and planning portal. Log of applications Target 100% Haringey will ensure that the planning and redevelopment teams considers 	.

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		with Air Quality Positive and Healthy Streets approaches			Localised benefits		<p>new policies on air quality positive and healthy streets at an early stage in the development of plans.</p> <ul style="list-style-type: none"> We will engage with GLA and TfL resources to support the development and deployment of these policies <p>KPIs:</p> <ul style="list-style-type: none"> For Air Quality Positive specific metrics of success will be expected to be proposed for each selected measure, and more detail on this will be provide in new Guidance accompanying the London Plan For Healthy Streets success should be measured against the ten Healthy Streets indicators. 	

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Public health and awareness raising	10.	<p>a) Public Health department taking shared responsibility for borough air quality issues and implementation of Air Quality Action Plans.</p> <p>b) Public Health Teams should be supporting engagement with local stakeholders (businesses,</p>	<p>Pollution</p> <p>Public Health</p>	Very Low to Low	<p>Low</p> <p>Protect individual health</p>	Ongoing	<p>Outputs/Measure/Targets:</p> <ul style="list-style-type: none"> Quarterly progress meeting on agreed actions Annual reporting. Healthy Living Pharmacy – to provide existing Cleaner Air for Haringey postcards to Public Health to distribute to relevant groups. Provide further material for engagement with vulnerable groups and active travel work. Discuss potential follow up to vulnerable groups workshops and consider additional groups. Clinical commissioning Group - This has a two-part objective, to raise awareness in a phased timeline to reach the following: <ul style="list-style-type: none"> Deliver awareness training to the CCG. Discuss asthma and air quality. 	<ul style="list-style-type: none"> Haringey council will continue to look for additional source of funding to enhance the measures described. Haringey will incorporate any measures identified by the School Street Action Plan into the Plan.

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		schools, community groups and healthcare providers). They should be asked for their support via the DPH when projects are being developed.				March 2020	<p>Looking at how key messages can be included into the school asthma guidelines and raising awareness sessions.</p> <ul style="list-style-type: none"> Develop a School Streets Action Plan identifying measures to be taken to reduce pollution around school <p>KPIs:</p> <ul style="list-style-type: none"> 70% School to attend Asthma Friendly Workshop 50% of school to achieve Asthma Friendly Status Monitor measures identified by School Street Action Plan 	
	c)	Directors of Public Health (DsPH) fully briefed on the scale of the problem in your local authority area; what is being done, and what is needed. A briefing should be provided	Public Health	Very Low	n/a unquantifiable but enhanced coordination will benefit air quality initiatives	Dec 2019	<p>Outputs/Measure/Targets</p> <ul style="list-style-type: none"> Public Health represented at Air Quality steering Group and Plan to be signed off by DOPH <p>KPIs:</p> <ul style="list-style-type: none"> Agreement to be signed off by DOPH 	
	d)	Directors of Public Health to have responsibility for ensuring their Joint Strategic Needs Assessment (JSNA) has up to date information on air quality impacts on the population	Public Health	Very Low	n/a unquantifiable but enhanced coordination will benefit air quality initiatives	To be updated 2020	<p>Outputs/Measure/Targets</p> <ul style="list-style-type: none"> Report/chapter reviews JSNA update – appropriate air quality considerations Update Chapter on Air Quality in the JSNA. <p>KPIs: JSNA to be reviewed and updated by 2020.</p>	
	e)	Strengthening co-ordination with Public Health by ensuring that at	Public Health	None	n/a unquantifiable but enhanced	Short term Ongoing	<p>Outputs/Measure/Targets</p> <ul style="list-style-type: none"> Minutes of AQ Steering Group Representative from PH part of AQ steering Group At least one PH specialist has air 	

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		least one public health specialist within the borough has air quality responsibilities outlined in their job profile			coordination will benefit air quality initiatives		quality in their objectives KPIs: Job specification of specialist to comply with requirement and actions included in workplan i.e. Health in all policy portfolio.	
		f) Director of Public Health to sign off Statutory Annual Status Reports and all new Air Quality Action Plans	Public Health	None	n/a unquantifiable but enhanced coordination will benefit air quality initiatives	As and when ASRs and AQAPs are completed	Outputs/Measure/Targets <ul style="list-style-type: none"> AQAP and Annual Status Reports are signed off by Director of Public Health benefits will be linked to increased health and well being KPIs: <ul style="list-style-type: none"> Signed AQAP and ASR as of when completed 	
	11	Engagement with businesses as part of the 'Liveable Neighbourhoods' project in Crouch End	Sustainable Transport/Major Schemes Projects	Medium	Low enhanced coordination will benefit air quality initiatives	Short term	Outputs/Measure/Targets: <ul style="list-style-type: none"> Progress Update Website/survey on Project Centre's consultation portal www.pclconsult.co.uk, mailing lists, leaflet drop, council channels, promotional boards, press (photo op for Cllr) and social media KPIs: <ul style="list-style-type: none"> Delivery of 3 workshops for residents/businesses/transport providers etc. Development of scheme and consultation on proposals by November 2019. Number of businesses actively engaged with. Number of businesses actively participating in reducing emissions. 	
	12	Supporting Airtex, promotion and dissemination of	Pollution	Very Low	Low Protect individual	Ongoing	Outputs/Measure/Targets: <ul style="list-style-type: none"> Information and promotion packs Promote via Public Health, schools (via 	

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		high pollution alert services.	Public Health, Active Communities and Health		Health		<p>smarter travel team Active communities and health) and business engagement</p> <ul style="list-style-type: none"> Disseminate Air text leaflets to Pharmacies – via Healthy Living Pharmacy Continue to distribute Cleaner Air for Haringey postcards and leaflets at events and stands Funding the air TEXT message service for Haringey Re-publicising the Mayor's social media pollution alerts through comms and social media channels. <p>KPIs:</p> <ul style="list-style-type: none"> Number of subscribers, Sign-ups to airtext or similar alert systems in the borough Engagement with vulnerable groups Estimated reach of pollution alerts within the borough (via social media etc.) 	
	13	Encourage schools to join the TfL STARS accredited travel planning programme	Active Communities and Health	Low	Low	Ongoing 67% of Haringey's schools accredited in 2016	<p>Outputs/Measure/Targets</p> <ul style="list-style-type: none"> Continue to promote the Schools STARS scheme Create activities to promote a sustainable and safe approach to travel Work with school to encourage schools to engage with the STARS scheme and gain accreditation, and Enable some schools to share their good news stories and activities - via the STARS website Develop a School Streets Action Plan identifying measures to be taken to reduce pollution around school <p>KPIs:</p> <ul style="list-style-type: none"> Increase the number of school travel plans to 68. With 38 at Gold and 20 at Silver Status in Haringey Monitor measures identified by School Street Action Plan 	
	14	Air quality in and around schools	Active Communities and Health	Low to Medium	Low – Medium	Ongoing	<p>Outputs/Measure/Targets:</p> <ul style="list-style-type: none"> Where funding is available deliver Personalised parent travel plan projects. Targeting schools where air quality is poorest. This will involve 	

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			Pollution				<p>working directly with parents and staff to produce individual travel plans that encourage active travel.</p> <ul style="list-style-type: none"> Where funding is available progress, implement School Walk Zone projects at schools where air quality is poorest. This will include 121 support with schools and delivery of walking campaigns. Work with TfL to incorporate Air Quality awareness into JTA and STARS programmes Engage in existing and future GLA's AQ Schools Audit Initiative Review monitoring at schools Subject to staffing resources provide presentations at schools on how to improve air quality and actions to take on high pollution days Identify further projects within schools with AQ in Focus Areas Investigate strategic partnership opportunities e.g. Trees for Cities <p>KPIs:</p> <ul style="list-style-type: none"> Where there are specific funded projects for Walk Zones and Parent Travel Plans that the projects specific KPIs are achieved. Schools that have received GLA audits supported to fully implement actions from their Implementation Plans by end of 2019. 5 schools supported to deliver their own air quality audits by April 2020 	

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Delivery servicing and freight	15	a) Update of procurement policies to reduce pollution from logistics and servicing.	Strategic Procurement	Very Low	Low NO ₂ PM & CO ₂	Short term	<p>Outputs/Measure/Targets</p> <p>Update all procurement policies as detailed below: policies</p> <ul style="list-style-type: none"> • Procurement guidance and documents to be updated to support low emission vehicles in our supply chain. To include model questions for tenders, model clauses and KPI's for our contract documents by Jan 2020. • Tender Documentation for Supply Chain to require ULEZ compliance by 2020. • Supply Chain engagement events held at contract renewal. • Inclusion of Air Quality considerations in updated Procurement Strategy by end of 2019 • Integrated Waste Management Contract (Veolia at present) has provision for a percentage of vehicle replaced to be electric. • Inclusion of Air Quality in Category Strategies for each main category area (Public Realm includes transport), Construction, Social Care and Corporate Supplies and Services) by May 2020 • Consultation with Dynamic Procurement System (DPS) team around including provision to incentivise passenger transport companies using lower emission/electric vehicles by May 2020 • Air Quality considerations in standard terms and conditions for Council Contracts (where applicable) • London Construction Programme (LCP) project for new pan London framework for construction; air quality to be a consideration in framework T&C's <p>KPIs:</p> <ul style="list-style-type: none"> • All passenger transport providers vehicles Euro VI compliant by end of 2021, 50% ULEV end of 2022 rising to 75% by end of 2023. 	<p>Haringey will seek further funding to encourage the use of cargo bikes by businesses.</p> <p>Businesses will be encouraged to apply for grants to purchase cargo bikes for small/local deliveries.</p>

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							<ul style="list-style-type: none"> internal fleet to be ULEZ compliant by 2020 Number of contracts with air quality requirements included. Number of Non-Road Mobile Machinery procured that are compliant with the NRMM Low Emission Zone standards or zero emission. 	
		b) Ensure local authority procurement policies include a requirement for suppliers with large fleets to have attained bronze Fleet Operator Recognition Scheme (FORS) accreditation or equivalent standard	Client & Commissioning	Low	Low NO ₂ PM & CO ₂	2019-2020	<p>Outputs/Measure/Targets Policies design to fit objective of the action. Measures included in policies:</p> <ul style="list-style-type: none"> Identify Resource to engage relevant Council staff to identify fleets and discuss potential measures Minimum standard of bronze or equivalent applied to relevant new contracts Audit of current fuel use and options for more sustainable solutions Explicit reference to air quality within procurement policy <p>KPIs:</p> <ul style="list-style-type: none"> Rigorous vehicle standards included within procurement policies. Number of contracts with air quality requirements included. 	
		c) Priority loading for ultra-low emission delivery vehicles	Carbon Management	Very Low	Low	Short to medium term	<p>Outputs/Measure/Targets</p> <ul style="list-style-type: none"> Loading bays and priority loading for ultra-low emission delivery vehicles Completion of investigation <p>KPIs:</p> <ul style="list-style-type: none"> No. of Loading Bays with electric charging 	
	16	<p>Reducing emissions from deliveries to local businesses and residents:</p> <p>Re-organisation of freight to support consolidation (or micro-consolidation) of deliveries, by</p>	<p>Pollution</p> <p>Procurement</p> <p>Regeneration</p>	Low to Medium	<p>Low- Medium</p> <p>Localised effect</p> <p>NO₂ PM & CO₂</p>	<p>Short - Medium term</p> <p>2019-2021</p>	<p>Outputs/Measure/Targets</p> <ul style="list-style-type: none"> Completion of Crouch End Business Engagement Project - to increase low emission deliveries and to investigate feasibility of installing an electric charging point/ cycle stands by April 2020. Promote the switch to lower emission vehicles, adopting smarter practices and reducing freight movements by better use of consolidated trips within 	

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		setting up or participating in new logistics facilities, and/or Potentially additional cost depending upon type of contract and distance needed to travel					BLEN 2020 - 2022 <ul style="list-style-type: none"> Cleaner vehicles and consolidated deliveries, such as EV-only loading bays, ULEV only areas within BLEN 2020 - 2022 <u>KPIs:</u> <ul style="list-style-type: none"> No. of businesses participating in projects or changing their fleet. Progress on Neighbourhoods of the Future project <ul style="list-style-type: none"> Number of residents engaged Number of businesses engaged Number of new charging infrastructure Number of EV's in Wood Green 	

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Borough Fleet	17	Reducing emissions from council fleets: Increasing the number of hydrogens, electric, hybrid, bio-methane and cleaner vehicles in the boroughs' fleet	Client and Commissioning Corporate Resources	Unknown	Low- Medium because borough fleet is small	Short to Medium term (2021)	<u>Outputs/Measure/Targets</u> <ul style="list-style-type: none"> Publication of new procurement strategy to include pollution reduction measures by end of 2019. Lead by example and increase the no> of ULEV in council owned fleet by 80% by 2021 	

				additional capital costs may be incurred but this could be offset by lower running and fuel costs			<ul style="list-style-type: none"> Review use of electric pool cars for staff use and of buying more by 2021. Review Staff Travel Plan to include travel payments to incentivise use of cleaner vehicles and minimise mileage and investigate Tax benefits of electric Vehicles: fossil fuelled vehicles – include salary sacrifice schemes for employees – by Mar 2020 Incentivise providers of Passenger transport to use electric/low emission vehicles through the procurement process – Mar 2020 <p>KPIs:</p> <ul style="list-style-type: none"> Replace 40% of our own vehicle fleets by 2020 and 80% by 2021 	
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Localised solutions	18	Expanding and improving green Infrastructure (GI)	Development Management Regeneration Carbon Management Pollution	Low to borough through regeneration Medium	Low Strong visual impact reinforces air quality message – long term air quality benefits	Short to medium	<p>Outputs/Measure/Targets.</p> <ul style="list-style-type: none"> Introduce a policy of maximising green infrastructure in all regeneration schemes and large scale developments March 2020. Investigate options for green infrastructure in schools in areas of higher as part of the school street action plan by Mar 2020. Develop a new parks and green space strategy to be delivered by end of year 2020 and to include measures to address air pollution and improve air quality i.e. tree planting, promotion of walking and cycling. Delivery of 265 additional trees on the streets, parks and housing estates within the borough by 2020 and 60 per 	

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			Parks				<p>year thereafter.</p> <ul style="list-style-type: none"> Apply to the Urban Tree Challenge Fund to fund up to 750 trees over two years <p>KPIs:</p> <ul style="list-style-type: none"> No. of Green Infrastructure projects implemented by the council NO. of trees planted. Monitoring data as an impact of projects including – concentration monitoring and the use of other indicators such as increases in walking and cycling. 	
	19	a) Low Emission Neighbourhoods (LENs)	Transport Planning Pollution Regeneration Carbon management	High (dependant on funding)	Medium	Mar 2020 Try to obtain funding in future	<p>Outputs/Measure/Targets</p> <ul style="list-style-type: none"> Carryout feasibility study into the viability of a LEN in one of Haringey's pollution hotspots Implementation of LEN in Haringey where funding identified. <p>KPIs:</p> <ul style="list-style-type: none"> LEN feasibility study to be completed by target deadline. 	<ul style="list-style-type: none"> Haringey's application for MAQF funding to implement a LEN was rejected, however we received funding to carry out a feasibility study therefore the delivery of any actions in relation to implementing a LEN will only be delivered if an alternative source of funding is found.
		b) Low Emission Vehicle Strategy	Carbon Management	Very Low	Low NO ₂ PM CO ₂	2019-2026	<p>Outputs/Measure/Targets</p> <ul style="list-style-type: none"> Implement measures in the ULEV Action Plan that were developed in line with Transport Strategy. To include Canal boats within strategy to improve emissions from heating fuel and transport fuel Incorporate reference to Air Quality considerations in the Procurement Code of Practice document by end of 2019. Adopt model Air Quality related clauses in our standard contracts by Mar 2020; Introduce specific Air Quality sections 	<ul style="list-style-type: none"> Consideration will be given to restricting mooring within residential areas.

Action category	Action ID	Action name and description	Responsibility	Cost (to Borough)	Expected emissions/concentrations benefit	Timescale for implementation	Performance Management and Measures (Outputs, Targets and KPIs)	Further Information
							<p>within our transport DPS that will enable suppliers to achieve higher quality scores for using lower emission vehicles by Mar 2020;</p> <ul style="list-style-type: none"> Incorporate Air Quality provision in several Pan London Works related Frameworks let by the Council. Haringey to initiate working in collaboration with Canal & River Trust to produce an action plan to reduce emissions from Canal Boats, end 2020. <p>KPIs:</p> <ul style="list-style-type: none"> Adoption of Low Emission Vehicle Strategy by end of 2019 Annual reduction in no. of complaints relating to pollution from canal boats. 	
		c) Road closures around Schools	Sustainable Transport - Operations	Medium	Low NO2 PM CO2	March 2020	<p>Outputs/Measure/Targets</p> <ul style="list-style-type: none"> Develop a School Streets Action Plan identifying measures to be taken to reduce pollution around schools Trial one road closure at Lordship Primary School at the start and end of school to inform a wider programme The appropriateness for further school streets projects will be subject to many factors including lessons learned from the Lordship pilot <p>KPIs:</p> <ul style="list-style-type: none"> Lordship primary road closures were implemented in the 1st quarter of 2019 after which the scheme will be monitored. Monitor measures identified by School Street Action Plan 	<ul style="list-style-type: none"> All consultation responses relating to traffic improvement measures have been referred to the Transport Strategy 2018 and Transport Policy statement due for publication.
		d) Public recognition of businesses that contribute to good air quality	Strategy & Communications	Very Low	Low	Short	<p>Outputs/Measure/Targets</p> <ul style="list-style-type: none"> Quarterly progress meeting on agreed actions Publicise actions that local businesses take to promote good air quality in Haringey through the Council's external communications channels Recognise individual businesses or groups of businesses, whether by 	

Action category	Action ID	Action name and description	Responsibility	Cost (to Borough)	Expected emissions/concentrations benefit	Timescale for implementation	Performance Management and Measures (Outputs, Targets and KPIs)	Further Information
							sector or locality, for innovation to commitment to improving air quality in the borough KPIs: No. of businesses where behaviour change identified.	
		e) Publicity of air quality status and Council activity	Strategy & Communications Pollution	Very Low	Low	Short	Outputs/Measure/Targets <ul style="list-style-type: none"> Achieve behaviour change from people living, working and visiting Haringey to improve air quality based on the information from the council Quarterly progress meeting on agreed actions Publicise actions that the Council is taking to tackle air pollution through the Council's social media channels Make the most recent air quality status from the borough's monitoring stations visible on the Council's website KPIs: <ul style="list-style-type: none"> Feedback from people living and working in Haringey entered into the council information systems 	

Cleaner transport	20	Ensuring that Transport and Air Quality policies and projects are integrated	Transport planning Development Management Pollution	Low	Medium	By 2020	<u>Outputs/Measure/Targets</u> <ul style="list-style-type: none"> • Work with TFL and GLA to reduce emission from transport • Effective communication between teams. • Regular meetings and formal processes in place to ensure effective communication. • Transport inputting into AQAPs and AQ inputting on all major transport projects. Develop a School Streets Action Plan identifying measures to be taken to reduce pollution around school <u>KPIs:</u> <ul style="list-style-type: none"> • Delivery of Walking and Cycling Action Plan by summer 2019 and work to its delivery. • Review and update current planning policies through the forthcoming local plan review and by April 2020 • Monitor measures identified by School Street Action Plan 	See 2018 ASR <ul style="list-style-type: none"> • All consultation responses relating to traffic improvement measures have been referred to the Transport Strategy 2018 and Transport Policy statement due for publication.
	21	Discouraging unnecessary idling by taxis and other vehicles	Pollution Transport Planning Smarter Travel Team	Low	Medium	By 2020	<u>Outputs/Measure/Targets</u> <ul style="list-style-type: none"> • Participate in the Pan London Anti-Idling Project to raise awareness and include enforcement by December 2019. • Reduce emission from Taxis and other vehicles idling unnecessary through raising awareness and taking enforcement actions by April 2020 • Continue engagement /awareness as part of the Pan London No Idling projects. • Several tools such as Wi-Fi enabled enforcement System, Bollards and advisory signage such as “no Idling” will be delivered as part of the project to enforce car idling and other environmental crimes occurring around school especially and in Haringey in general • Train enforcement officers on car idling and how to issue parking fines • Advisory notes to be issues to drivers, enforcement officer to issue fines for idling crimes 	

							<u>KPIs:</u> <ul style="list-style-type: none">• Number of vehicles ask to stop idling• No. of FPNs issued for vehicle idling.• Where marketing campaigns are undertaken the effects of these could be tracked, the number of hospitals displaying anti-idling videos for example.• Monitoring along the lines of Idling Action Days study will be considered.	
22	Regular temporary car free days	Pollution and All	Low	Medium	By 2020	<u>Outputs/Measure/Targets</u> <ul style="list-style-type: none">• Deliver regular temporary road closures in high footfall/iconic areas, schools and hospitals for example working with local community group and other relevant organisations• Organise and car free day at least once per year• Implement and gain lessons from car free days.• Develop a School Streets Action Plan identifying measures to be taken to reduce pollution around school <u>KPIs:</u> <ul style="list-style-type: none">• Annual evaluation of scheme• No. Of temporary road closures undertaken by community groups as tracked through local authority records.• Concentration monitoring of the impact of road closures• Increases in walking and cycling after road closure events.• Monitor measures identified by School Street Action Plan		
23	Using parking policy to reduce pollution emissions such as free or discounted parking charges or residential parking permits for zero emission cars and/ or surcharges on diesel vehicles below Euro 6 standards for Resident and Controlled Parking	Paring Services/Finance	Low	Medium	By 2020	<u>Outputs/Measure/Targets</u> <ul style="list-style-type: none">• Investigate modification of parking policies to reduce air pollution by end of 2020.• Report on Parking Action Plan to address air quality and carbon emissions. <u>KPIs:</u> performance indicators will be obtained through <ul style="list-style-type: none">• Delivery of a stronger emissions-based parking permitting scheme• Proportion of residential permits issued to both most polluting and cleanest vehicles.• Comparison of fine income against	A Parking Action Plan is being developed as part of the Transport Strategy (March 2018)	

		Zone permits					other boroughs.	
24	a)	Installation of Ultra-low Emission Vehicle (ULEV) infrastructure (electric vehicle charging points, rapid electric vehicle charging point and hydrogen refuelling stations): Support GLA in the Expansion of ULEZ	Transport Planning Pollution Carbon Management Strategy and Communications TFL	Low	Medium	By 2020	Outputs/Measure/Targets <ul style="list-style-type: none"> Aim for all taxis and Private Hire Vehicles to become zero-emission by target deadlines. Communications campaign to let residents know about benefits that ULEZ will bring and help them get prepared including making them aware of the options (public transport, cycling, walking and low emission vehicles) We will install at least 10 rapid points across the borough by 2020 We will install at least 300 points by 2021 KPIs: an increase in the following through monitoring will provide us with some performance indicators <ul style="list-style-type: none"> To install a total of 670 new electric vehicle charging points in the borough by March 2023 (BP) Monitoring proportion of electric vehicles registered by residents in the borough. (TfL) Monitoring proportion of lampposts or equivalent infrastructure which have been modified to enable EV charging. 	
	b)	Increasing the proportion of electric, hydrogen and ultra-low emission vehicles in Car Clubs	Transport Planning and Carbon Management TFL	Very Low to Low	Low	2019/24	Outputs/Measure/Targets <ul style="list-style-type: none"> Register the proportion of electric, hydrogen and ultra-low emission vehicles in Car Clubs Number of EV car club cars in the borough. Continue to increase the EV fleet within car clubs. (Currently 20%) Neighbourhoods for the Future aiming to increase EV charging in Wood Green to support this. All car club spaces in Wood green will be electrified as part of NoF KPIs: <ul style="list-style-type: none"> Monitoring proportion of electric, hydrogen and ultra-low registered by residents in the borough. (TFL) 	
	c)	Increase the introduction and use of electric	Transport Planning Carbon	Low	Low	2018/21	Targets: <ul style="list-style-type: none"> Number of new car club cars/bays and no. members 	

		vehicle Car Clubs across the borough	Management Development Management				<ul style="list-style-type: none"> Conditions are included for car clubs' spaces in developments Car clubs continue to expand number of spaces Continue to request car club spaces in new development <p>KPIs:</p> <ul style="list-style-type: none"> Number of Car Clubs in the borough Number of car club permits given 	
		d) Reprioritisation of road space; reducing parking at some destinations and or restricting parking on congested high streets and A roads to improve bus journey times, cycling experience, and reduce emissions caused by congested traffic	Transport Planning, TfL	Medium to High	Low to Medium NO2 PM CO2	Ongoing 2019-2022	<p>Targets:</p> <p>Number of relevant major schemes implemented</p> <ul style="list-style-type: none"> Pursue as part of Neighbourhoods for the Future in Wood Green and roll out successful initiatives elsewhere in the borough. Plans to deliver 3 points in the borough (Crouch End 2, Wood Green 1) Rapid charging for taxi ranks in Wood Green (NoF) Mayor of London Healthy streets initiative - Haringey awarded funding for 'Liveable Neighbourhoods' project in Crouch End Investigate potential for additional schemes in Focus Areas Bus priority measures Bus enabling measures Cycle parking Priority in Borough Transport Plan 	
	25	Provision of infrastructure to support walking and cycling To enable cycling by increasing the number of secure cycle parking spaces.	Development Management Transport Planning Smarter Travel Team	Medium to High	Low to Medium depending on level of implementation	<p>Action plan developed by summer 2019</p> <p>Action Plan Adopted 2019</p> <p>Ongoing actions</p>	<p>Outputs/Measure/Targets</p> <ul style="list-style-type: none"> Adopt a The Healthy Streets Approach to help, everyone to use cars less and to walk, cycle and use public transport more. Cycling and Walking action plan adopted Increase modal share for Walking Increase modal share of Cycling Increase in Cycle parking spaces Haringey DPD Policy DM31 – supports the protection, improvement and creation of pedestrian and cycle routes to encourage walking and cycling as a means of transport and as a recreational activity. Require submission of travel plan a transport assessment for developments 	

							<p>in line with TFL thresholds</p> <ul style="list-style-type: none"> • Develop Cycling and Walking Action Plan in line with Transport Strategy • Borough led investment to promote cycling includes measures in the LIP: • To promote and support cycling via Cycle Training and Cycle Maintenance workshops local cycle routes • Increase cycle parking • Crouch End Liveable Neighbourhoods Project <p>KPIs:</p> <ul style="list-style-type: none"> • The number of additional space/hanger provision per year will depend on funding (ideally 72 spaces or 12 hangers per year) (BP) • 81% of all trips to be made by foot, cycling or public transport by 2021 (88% by 2041) • 20% of residents within 400m of a cycle network - by 2021 • 41% of residents doing at least 2X10mins (or 1 block of 20mins) of active travel per day by 2021. • Cycle counter results (TfL) • Length in miles of dedicated cycle paths 	
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1 **Appendix A Response to Consultation**

Schedule 11 of the Environment Act 1995 requires the Council to consider any representations made in accordance with the consultation. Therefore, public consultation was carried out between the 28th May 2019 to 30rd July 2019.

Three main groups were consulted during the development of the Air Quality Action Plan.

these comprised of: -

- Internal stakeholders who will deliver the actions detailed in the plan;
- Statutory consultees as required by the legislation and
- The external stakeholders due to significant public interest in health issues and local air quality.

a) **Internal Stakeholders:** The consultation of each relevant service area was carried out before and during the development of the plan. This included the following service areas:

- Carbon Management & Homes for Haringey
- Development Management /Analyst & Systems Team
- Parks & Regeneration
- Public Health
- Smart travel
- Transport (including Parking Services Finance, Sustainable Transport – Operations, Sustainable Transport/Major Schemes Projects & Transport Planning)
- Strategic Procurement, Client & Commissioning
- Others (including Corporate Resources, Strategy & Communications, GLA and Enforcement Response)

Comments and queries made by each service were addressed prior to external consultation. All staff working for Haringey council were further consulted during the public consultation.

b) **Statutory consultees as required by legislation:** It is a legal duty under Environment Act 1995 and the London Local Air Quality Management Framework to consult specific parties and agencies during the development of any air quality strategies and action plans. The following parties were contacted directly by email as planned.

- Residents
- Local MPs and Members
- Secretary of State
- Environment Agency
- Transport for London
- All neighbouring local authorities, the North London Cluster Group
- Bodies representing local business interests and other organisations such as North London Chamber of Commerce and Enterprise
- The Greater London Authority (GLA) was consulted during the development and consultation stages. They recommended more defined targets in relation to the Council's fleet and the localised solutions. These amendments were made, and the

final draft plan was agreed with the GLA. See Appendix A - Consultation Report Table 2 for full details of the GLA comments and amendments made to the plan as a result of them.

Eleven statutory stakeholders responded to the consultation.

c) External Stakeholders: The results of the consultation can be summarised as follows:

- 253 consultees responded to the AQAP consultation; with only 2 from businesses exclusively;
- 85% were from Haringey resident;
- 96% of all respondents said air pollution is important if not very important;
- 44% agreed that the seven actions identified by priority will meet the needs of the borough and help reduce pollution;
- 33% disagreed that the seven actions proposed were appropriate, and
- 23% responded “I don’t know”,

The results of the consultation revealed that whilst the proposed measures are generally acceptable, a combination of complementary initiatives is key to creating a positive impact in both the short and longer-term on-air quality in Haringey.

Emissions from traffic are considered the main source of pollution in Haringey. Initiatives with evidence of positive impacts on air quality in the short term such as increasing charging fee and enforcement, infrastructures and traffic management should be given priority. Pedestrianisation, road closures, temporary and permanent car free days as well as green infrastructure were particularly recommended as one of the priority measures by most respondents. The consensus among the consultees was that good public transport coverage, good cycle and walking infrastructure linked to discouraging private use of petrol and diesel fuelled cars and encouraging alternative forms of transport could help resident and businesses improve air quality.

Better transport planning as well as a communications strategy with associated materials to build public awareness on air pollution was considered necessary. In the longer term, behavioural change strategies to move people away from car use were considered warranted.

As with all London Borough Councils, vehicle idling was the most discussed problem. Stricter enforcement measures were recommended around schools and other venerable receptors.

Air pollution monitoring and audits were recommended at each school within Haringey.

Changing parking policies by increasing parking charges in line with the surrounding boroughs was suggested as source of additional revenue and to help reduce transboundary diesel car pollution.

More bold and ambitious actions with specific targets by Haringey Council will be welcomed by the residents. Further details of the consultation responses and proposed actions from Haringey Council are presented in a separate report available on the Council’s website or on request.

2 Appendix B Reasons for Not Pursuing Action Plan Measures**Table B.1 Action Plan Measures Not Pursued and the Reasons for that Decision**

Action category	Action description	Reason action is not being pursued (including Stakeholder views)
None	Not applicable	Not applicable

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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 protected 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	Air Quality Action Plan 2019-24
Service area	Regulatory Services
Officer completing assessment	Felicia Ekemezuma
Equalities/ HR Advisor	Luke Rigg
Cabinet meeting date (if applicable)	12 th November 2019
Director/Assistant Director	Stephen McDonnell

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*

Haringey Air Quality Action Plan (AQAP) 2019-2024

1. This proposal outlines the air quality actions that the London Borough of Haringey (The Council) will deliver in partnership with others between 2019-2024 in order to reduce concentrations of pollutants, and exposure to pollution; thereby positively influencing the health and quality of life of residents and those employed in or visiting the borough. The AQAP has been developed in recognition of Haringey's corporate priorities and the legal requirement for the local authority to work towards air quality objectives under Part IV of the Environment Act 1995 and relevant regulations made under that Act and to meet the requirements of the London Local Air Quality Management statutory process¹. The AQAP will be subject to an annual review and progress reporting.
2. Key Stakeholders –All Haringey residents/visitors/employees and employers, Regulatory Services, Planning, Public Health, Transport Planning, Procurement, Homes for Haringey DEFRA, GLA, Mayor of London, Neighboring local Authorities.
3. The draft Air Quality Action Plan will go to cabinet for sign off prior to statutory and public consultation and will return to cabinet for final approval after the consultation.

¹ LLAQM Policy and Technical Guidance. <https://www.london.gov.uk/what-we-do/environment/pollution-and-air-quality/working-boroughs>

² <https://www.equalityhumanrights.com/en/anghydraddoldeb-traws-wedi%E2%80%99i-adolygu/introduction-review>

² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/457752/nts2014-01.pdf

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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	<i>Equalities Scorecard</i>
Gender Reassignment	EHRC national data	
Age	Haringey JSNA, 2011 Census ONS data,	<i>Equalities Scorecard</i>
Disability	Haringey JSNA, 2011 Census ONS data, JMP report Haringey ONS Disability in England and Wales, 2011	<i>Equalities Scorecard</i>
Race & Ethnicity	Haringey JSNA, 2011 Census ONS data, JMP report Haringey	<i>Equalities Scorecard</i>
Sexual Orientation	ONS integrated household survey data,	
Religion or Belief (or No Belief)	Haringey JSNA, 2011 Census ONS data,	
Pregnancy & Maternity	Haringey JSNA, 2011 Census ONS data,	

Marriage and Civil Partnership	2011 Census	
<p>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?</p> <p><i>Explain how you will overcome this within the proposal.</i></p> <p><i>Further information on how to do data analysis can be found in the guidance.</i></p>		
<p>Key Findings</p> <p>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.</p> <p>Air quality is a complex problem with a range of impacts on health and is a contributor to health inequalities. There is strong evidence that NO₂ and PM are harmful to health in a number of ways.</p> <ul style="list-style-type: none"> • Short term exposure is associated with: <ul style="list-style-type: none"> a) Worsening symptoms in those with pre-existing lung disease and asthma b) Increased risk of cardiovascular events including myocardial infarction and stroke • Long term exposure is associated with: <ul style="list-style-type: none"> a) Increased risk of developing cardiovascular disease b) Increased risk of developing cancer (especially lung cancer) c) Reductions in lung function for both children and adults d) Low birthweight (which leads to a higher risk of a range of complications and longer-term effects) <p>London has experienced significant reductions in NO_x emissions since 2008, and these have been replicated in Haringey. Nevertheless, parts of Haringey still routinely exceed European standards relating to air quality, including NO₂ and PM₁₀ and as such the whole of Haringey was designated an air quality management area in 2001.</p> <p>Poor air quality disproportionately affects groups with certain characteristics, such as:</p> <ul style="list-style-type: none"> a) Age: with the young and old being at particularly high risk b) Disability: Pre-existing health conditions including diabetes, respiratory symptoms and obesity c) Proximity to pollution sources d) Poor diet e) Deprivation <p>The Air Quality Action Plan will continue to drive the air quality agenda forward and ensure that Haringey leads by example and that improving air quality is embedded within all relevant Council strategies and policies.</p>		

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 action plan demonstrates the Council's commitment to continuing its active travel programme of cycle promotion and training for its residents and refers to the Cycling and Walking Action Plan.

The National Travel Survey: England 2014 indicate that women are more likely to make short/local car trips as they tend to be the primary carers to young children, the elderly or disabled relatives. They may be negatively impacted by the ambition to reduce private car use, but should concurrently benefit from the improved public transport, improved walking and cycling routes, active travel planning via schools and the resulting cleaner air.

We will examine the barriers to this protected group and set out a list of actions needed to increase the proportion of this protected group making trips by bicycle and on foot in the borough.

At this stage, it is considered that the AQAP will have a positive impact on this protected characteristic.

Gender Reassignment

We do not hold data on the number of people who are seeking, receiving or have received gender reassignment surgery in Haringey. The Equality and Human Rights Commission estimate that there is between 300,000-500,000 transgender people in the UK¹. 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.

The Council will use the public consultation to support the identification of any potential impact.

Age – Children

The population in Haringey 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.

Air pollution disproportionately affects the young. Studies have shown that the lung development of a baby exposed to air pollution in the womb can be altered, and it affects birth weight.

Young children are also more vulnerable to breathing in polluted air than adults. For their size, they breathe more air each minute than an adult. Buggies and prams put them at the level of

car exhausts. If a child breathes high levels of air pollution over a long period, they might be at risk of:

- their lungs not working as well as they grow older
- developing asthma during childhood or as an adult - and if they have asthma already, air pollution can make it worse
- wheezing
- coughs
- lung cancer when they're older
- infections like pneumonia

Children will therefore benefit from the drive to improve air quality.

Three Schools in the east of the borough received Air Quality Audits and the recommendations are likely to have a positive impact on the pupils. Learning from these audits will be rolled out across the borough.

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. This group will therefore be targeted by the active travel options and therefore should receive increased health benefits.

Age - Older People

Elderly residents in the more deprived parts of the borough are particularly vulnerable to poor air quality.

The air quality action plan will have a positive impact on this groups by reducing pollution sources and pollution exposure, this group will also receive health benefits from the increased focus on active travel and public transport options. The Council will use the public consultation to support the identification of any potential impact.

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.

Reducing toxic pollutants such as NO₂, PM₁₀ & PM_{2.5} will benefit people with pre-existing health conditions such as chronic obstructive pulmonary disease (COPD) and asthma, whereas those residents suffering from obesity will benefit from the active travel options.

At this stage, it is considered that the AQAP will have a positive impact on this protected characteristic. The Council will use the public consultation to identify any potential impact.

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 and 55% for London. Nearly 81% of our schoolchildren come from a non-white community. 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. Studies have shown that there is a strong correlation between deprivation and pollution. Homes and residences in highly deprived areas tend to be more condense, nearer to roads with high concentration of pollution and less green space.

It is therefore thought that this group will greatly benefit from improvements in air quality and a reduction in exposure to pollution.

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 specific needs identified for LGB people in the borough and it is thought that they will not be disproportionately impacted by the strategy.

This group like all other residents should benefit from the improvements in air quality and reduction in exposure to pollution.

At this stage, it is considered that the AQAP will not disproportionately impact this protected characteristic, however the Council will use the public consultation to identify any potential impact.

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%).

It is considered, at this stage, that there are no specific needs identified for faith groups in the borough and therefore they should not be disproportionately impacted by the air quality action plan.

The Council will use the public consultation to identify any potential impact.

Pregnancy and Maternity

Long term exposure to air pollution is associated with low birthweight (which leads to a higher risk of a range of complications and longer-term health effects).

Women in Haringey who are pregnant or are caring for young babies will also fall into other vulnerable groups and groups with protected characteristics.

Although pregnant women may not be able to access all of the opportunities available via active travel, they will benefit from the resultant improvements in air quality and reduction in exposure to pollution.

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 have no identified specific needs in relation to the air quality action plan. However, they may fall into a vulnerable group or in a group with other protected characteristics.

At this stage, it is considered that the AQAP will not have a disproportionate impact on this protected characteristic. The Council will use the public consultation to identify any potential impact.

Engagement to date:

The draft plan was written with the engagement of all key stakeholders, including local community groups and Councillors. Four workshops were held during the initial drafting of the document, which were attended by Council staff, Members and the local community.

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

Public consultation on the Draft Air Quality Action Plan will take place in May 2019. The consultation will involve public exhibitions, the use of social media including twitter, an online questionnaire as well as availability in accessible formats and information via a dedicated web page.

The needs of protected groups will be considered when deciding how to consult:

- The time and location of the exhibitions will be chosen so as not to exclude any group
- Accessible locations will be chosen in different parts of the borough. The timing of exhibitions will allow for those who work or have childcare commitments the opportunity to attend

- Exhibition boards will be designed to summarise the key points of the action plan to assist the visually impaired or those who have difficulty reading. Officers will be on hand to explain the action plan and to take note of any comments received. The locations will be chosen because they are frequently used, particularly by school children, parents and older people.
- The council will send out 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 will be placed in all Haringey libraries and the Civic centre to review.

Consultation will provide residents with an opportunity to inform the council about the particular impacts on protected groups. The findings of the consultation will inform the final version of the AQAP

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?

Public Consultation took place between 28th May and the 30th July 2019. The Council used a variety of consultation techniques including:

- An online questionnaire which was available in accessible formats, launched on the Council's website on the 28th of June;
- Information leaflets and questionnaires were available at all major libraries;
- 3 public, 2 members and 2 specialist groups workshops were delivered to provide opportunities for further stakeholder engagement.

The following key statutory consultees were also consulted directly by email:

- Local MPs and Members
- Secretary of State
- Environment Agency
- Transport for London
- All neighbouring local authorities, in particular the North London Cluster Group
- Bodies representing local business interests and other organisations such as North London Chamber of Commerce and Enterprise
- Local schools and colleges
- The Greater London Authority (GLA) was consulted during the development stage and will be consulted again on the final issue of the document.

A total of 248 general public consultees responded to the AQAP consultation;

84% were from Haringey resident;
1% Haringey Business
8% Work in Haringey
5% Regular visitor
2% Other please

Eleven consultation responses were received from statutory stakeholders.

The majority of respondents most interest in air quality were age between 30-44:

0% <24
5% 24-29
40% 30-44
30% 45-59
7% 60-64
12% 65-74
2% 75-84
1% 85 -94
2% did not provide an answering to this question

Response were from a variety of people including:

4% Deafness or partial loss of hearing
0% Developmental disorder
2% Mental ill health
2% Physical disability
2% Other disability
1% Learning disabilities
4% Long term illness or condition
46% No disabilities
39% did not provide an answer to this question

Unfortunately, most questions in the Equal Opportunities Monitoring Form were not completed.

The results of the consultation revealed that the proposed measures are generally acceptable. The consensus was that a combination of complementary initiatives is key to creating a positive impact in both the short and longer-term on-air quality in Haringey.

Emission from traffic is the main source of pollution in Haringey, initiatives with evidence of positive impacts on air quality in the short term such as traffic reducing interventions including more charging points, enforcement, infrastructures and traffic management should be given priority. Pedestrianisation, road closures, temporary and permanent car free days as well as green infrastructure were particularly recommended as priority measures by most respondents.

The consensus among the consultees was that good public transport coverage, good cycle and walking infrastructure, linked with discouraging private use of petrol and diesel fuelled cars and encouraging alternative forms of transport could help resident and businesses improve air quality.

Better transport planning as well as a communications strategy to build public awareness on air pollution was considered necessary to deal with pollution. In the longer term, behavioural change strategies to move people away from car use were considered warranted.

As with all London borough councils, vehicle idling was the most discussed problem. Stricter enforcement measures were recommended around schools and other vulnerable receptors.

Air pollution monitoring and audits were recommended at each school within Haringey.

Changing parking policies by increasing parking charges in line with the surrounding boroughs was suggested as source of additional revenue and to help reduce transboundary diesel car pollution.

More bold and ambitious actions with specific targets by Haringey Council will be welcome by the residents. Further details of the consultation responses and proposed actions from Haringey Council are presented the consultation report attached as Appendix A.

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 EqlA guidance

1. Sex

At present it is thought that the air quality action plan will have a positive impact to all residents regardless of gender it is also thought that it will have a positive impact on women who tend to make more trips within the borough in relation to childcare, school runs and caring for elderly or disabled relatives.

Positive	X	Negative		Neutral impact		Unknown Impact	
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2. Gender reassignment

It is not known whether the air quality action plan will have either a positive or negative impact on people undergoing or who have undergone gender reassignment, however it is thought that it will have a positive impact on everyone.

The public consultation failed to identify any information relevant to this protected group.

Positive		Negative		Neutral impact		Unknown Impact	X
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3. Age

Children and older people are particularly vulnerable to poor air quality and will benefit from improved air quality and reduced exposure to air pollution.

The consultation demonstrated a real need for reducing pollution around sensitive receptors i.e. near school, hospitals, care homes and pedestrians. Recommendations made have been incorporated into the AQAP or already referenced in other policies and strategies across the Council.

Positive	X	Negative		Neutral impact		Unknown Impact	
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4. Disability

The air quality action plan will have a positive impact on disabled people, particularly those with pre-existing health conditions such as asthma, chronic obstructive pulmonary disease, diabetes by improving air quality and reducing exposure to pollution. The active travel actions will also assist this group.

Positive	X	Negative		Neutral impact		Unknown Impact	
----------	---	----------	--	----------------	--	----------------	--

4. Race and ethnicity

This group are particularly vulnerable to poor air quality due to their homes and residencies being near areas where pollution levels are high. They will positively benefit from improvements in air quality and a reduction in exposure to pollution

Positive	X	Negative		Neutral impact		Unknown Impact	
----------	---	----------	--	----------------	--	----------------	--

6. Sexual orientation

It is anticipated that the impact on people with this protected characteristic will be the same as for people who do not share this protected characteristic.

Positive	X	Negative		Neutral impact		Unknown Impact	
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7. Religion or belief (or no belief)

It is anticipated that the impact on people with this protected characteristic will be the same as for people who do not share this protected characteristic.

Positive	X	Negative		Neutral impact		Unknown Impact	
----------	---	----------	--	----------------	--	----------------	--

8. Pregnancy and maternity

Pregnant women and unborn children are particularly vulnerable to poor air quality as it is associated with low birthweight and subsequent health conditions. This group will benefit from improvements in air quality and a reduction in exposure to pollution.

Positive	X	Negative		Neutral impact		Unknown Impact	
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9. Marriage and Civil Partnership

It is anticipated that the impact on people with this protected characteristic will be the same as for people who do not share this protected characteristic. This group will benefit from improvements in air quality and a reduction in exposure to pollution.

Positive	X	Negative		Neutral impact		Unknown Impact	
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10. Groups that cross two or more equality strands e.g. young black women

Black and Ethnic Minority (BAEM) Children

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 and may also fall into one or more of the groups with protected characteristics.

The plan has focused more of its actions in the East of the borough as people that reside in the area are more likely to be deprived and exposed to higher levels of pollution. As the overall impact of the action plan is to improve air quality and reduce people's exposure to air pollution, it is anticipated that all groups will experience a positive 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 strategy is not considered to result in any direct/indirect discrimination for any groups that share the protected characteristics.

The Air Quality Action Plan is considered to have a positive effect on all residents in Haringey and in particular it should have a positive impact on:

- The vulnerable groups such as the young, elderly and those with pre-existing health conditions, by reducing the risk of symptoms such as underdeveloped lungs, on set of Asthma, aggravation of coronary/pulmonary diseases.
- BAEM and the deprived – as a large number of them live in the East of the borough where exposure to pollution is higher.

The action plan ties into a range of other borough plans, strategies and policies that will also drive air quality improvements.

- All residents, but in particular the young, elderly, disabled and pregnant mothers will be encouraged to take up active travel options which will improve their health and foster good relations with others who already participate.

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 EqlA guidance

Outcome	Y/N
No major change to the proposal: the EqlA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken. <u>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.</u>	Y
Adjust the proposal: the EqlA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality. Clearly <u>set out below</u> 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
N/A			


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:

Progress on each of the actions in the air quality action plan will be reported on annually to central government and published on the Council website

7. Authorisation

EqlA approved by 
(Assistant Director/ Director)

Date 24/10/19

8. Publication

Please ensure the completed EqlA is published in accordance with the Council's policy.

Please contact the Policy & Strategy Team for any feedback on the EqlA process.

Report for: Cabinet, 12th November 2019

Title: **Affordable Energy Strategy and agreement to proceed with public consultation**

Report

authorised by : Dan Hawthorn, Director, Housing, Regeneration and Planning

Lead Officer: Gillian Cox, 0208 489 3489, gillian.cox@haringey.gov.uk

Ward(s) affected: ALL

Report for Key/

Non Key Decision: Key Decision

1. Describe the issue under consideration

- 1.1 Cabinet is asked to approve the Draft Affordable Energy Strategy (2020-2025) and for it to go out for a three month public consultation. The Affordable Energy Strategy replaces the previous Affordable Warmth Strategy. This is in recognition that fuel poverty or 'energy vulnerability' goes beyond cold homes and related health effects. It sets out the vision and objectives for reducing the proportion of households in fuel poverty in the borough which has increased from 11.2% in 2011 to 14.5% in 2017.
- 1.2 The vision of this strategy is:-
To reduce the number of households struggling to afford to adequately power their homes and improve the health and wellbeing of residents by:-
- Improving the energy efficiency of housing and reducing overheating risks,
 - Connecting residents to support services and initiatives to overcome the many causes of fuel poverty, such as energy prices, low incomes and unemployment.
- 1.3 This vision will be delivered by the following objectives:-
- Objective 1. Increase the number of struggling households receiving energy advice and expanding the support available to create a people-centred solution
 - Objective 2. Improve housing energy performance to reduce fuel poverty, cold homes and overheating
 - Objective 3. Maximise the funding and resources secured within Haringey to alleviate fuel poverty
- 1.4 If approved by Cabinet on 12th November, the strategy should go out for public consultation. The final Strategy will take account of consultation feedback before being finalised for approval and adoption by Cabinet.

2. Cabinet Member Introduction

Tackling fuel poverty will help develop a fairer Haringey. Over 15,000 households in the borough struggle to pay their energy bills and can face the difficult decision of switching off appliances and heating over food and managing household finances. Living this way can have a huge impact on the health and wellbeing of our residents, the academic achievements of our children, and ultimately more demand on public services.

I am therefore pleased to introduce Haringey's Affordable Energy Strategy which sets out our 5 year plan to improve the energy efficiency of homes in all tenures and a referral network throughout the borough to tackle fuel poverty. Unlike previous Affordable Warmth Strategies, the risk of overheating and the associated health impacts are considered due to the impacts of Climate Change already being felt in Haringey.

Tackling fuel poverty should be and is a priority. One which is even more important with the ever-increasing cost of energy, the impact of climate change, and the urgent need to reduce carbon emissions from our homes.

3. Recommendations

3.1 It is recommended that Cabinet:

- i) Approve the draft Affordable Energy Strategy 2020-2025 at appendix for public consultation.
- ii) Note that following the public consultation the final strategy will come back to cabinet for approval

4. Reasons for decision

4.1 'Energy vulnerability' is a recognised term that highlights that some households find it difficult to adequately power their homes which adversely affects their daily life and health. It incorporates fuel poverty, which is caused by low incomes, high energy prices and energy inefficient housing. In England fuel poverty is currently measured using the low income-high cost definition, which states that a household is in fuel poverty if:

- Their income is below the poverty line (taking into account energy costs and;
- Their energy costs are higher than is typical for their household type

Overheating can impact the same groups that are at risk from fuel poverty.

4.2 The existing [Affordable Warmth Strategy \(2009-2019\)](#) has now expired. It is estimated that over 15,000 households in Haringey experience fuel poverty. By adopting a new strategy Haringey will have a clear way forward to tackle fuel poverty in the borough and improve the health and wellbeing of its residents.

4.3. The proposed revised strategy- the Affordable Energy Strategy (2020-25), has a wider scope to recognise that fuel poverty goes beyond cold homes. The ability to adequately power household appliances, lighting and communication equipment can impact academic attainment, digital inclusion, access to employment opportunities and increase social isolation. The strategy also

recognises that in a changing climate, there is a need to keep homes cool during periods of high temperatures as well as warm in winter.

- 4.4 **The government's [Fuel Poverty Strategy For England \(Cutting the Cost of Keeping Warm\) 2015](#) and [Fuel Poverty Regulations \(England\) 2014](#)** set a target to ensure that as many fuel poor homes 'as is reasonably practicable' achieve a minimum energy efficiency rating of Band C by 2030.

Interim milestones have also been set to ensure 'as many fuel poor homes as is reasonably practicable' achieve a minimum energy efficiency rating of Band E by 2020, and Band D by 2025. The phased approach follows a principle of prioritising assistance to those in the deepest levels of fuel poverty.

- 4.5 Public consultation will ensure that residents have the opportunity to reflect on the proposals and provide their views. A key recommendation of the strategy is to develop a referral network to reach those most in need, conducting a public consultation exercise will begin the relationship building process required to develop such a network.

- 4.6 The draft vision is:

"To reduce the number of households struggling to afford to adequately power their homes and improve the health and wellbeing of residents by:-

- *Improving the energy efficiency of housing and reducing overheating risks,*
- *Connecting residents to support services and initiatives to overcome the many causes of fuel poverty, such as energy prices, low incomes and unemployment."*

- 4.7 This vision will be delivered through the following objectives:-

- Increase the number of struggling households receiving energy advice and expand the support available to create a people-centred solution
- Improve housing energy performance to reduce fuel poverty, cold homes and overheating
- Maximise the funding and resources secured within Haringey to alleviate fuel poverty

5. Alternative options considered

5.1 Do nothing

The strategy would not be redrafted and released. The Council will have no coherent strategy to improve the circumstances of around 15,000 households living in fuel poverty in Haringey and meet the ambitions of the Borough Plan by driving up the quality of housing for everyone and exploring setting up an alternative local or regional energy savings company(s).

5.2 Reduce the scope of the strategy

Reducing the scope to address the energy efficiency of homes would not necessarily lift households out of fuel poverty. Ignoring overheating risks could cause problems in the future as periods of hotter weather increase.

6. Background information

6.1 Haringey's [Affordable Warmth Strategy 2009-2019](#) has expired. This strategy concentrated on assisting residents to adequately heat their homes with a vision *"To make sure that no household in Haringey lives in a cold, unheated home and that people know how to use energy in their homes efficiently, therefore saving money and reducing CO2 emissions"*.

6.2 Whilst many fuel poverty interventions have been undertaken in the borough under this strategy. Fuel poverty remains an issue for many Haringey residents. Fuel poverty in England is measured using the Low Income High Costs (LIHC) indicator. Under the LIHC indicator, a household is considered to be fuel poor if they have required fuel costs that are above average (the national median level) and were they to spend that amount, they would be left with a residual income below the official poverty line.

- In 2017 there were 15,189 households living in fuel poverty in Haringey. 14.5% of the households in the borough. This is the 4th highest percentage in London and substantially above the London average (11.8%).
- Over the past 5 winters, there were 350 Excess Winter Deaths (EWDs) in Haringey. The Office for National Statistics defines EWDs as the additional number of deaths occurring during December to March in any one year compared to the number of deaths that occurred in the preceding August to November and the following April to July. [The Hills Review](#) estimated that some 10 per cent of EWDs are directly attributable to fuel poverty and a World Health Organization report estimates that 30 per cent of EWDs could be attributed to cold housing. This equates to between 35 – 105 deaths in Haringey between 2012 and 2017 where the inability to heat homes adequately may have been a contributory factor. The Excess Winter Mortality index (EWM) is calculated so that comparisons can be made between sexes, age groups and regions, and is calculated as the number of EWD divided by the average non-winter deaths in the winter of 2017/18 the EWM for London was 27.3 compared to 29.8 for Haringey.

6.2.1 To assist these households and to meet national targets in the Fuel Poverty (England) Regulations 2014 and the Government's Fuel Energy Strategy 2015, ie to ensure that "as many fuel poor households ensure that as many fuel poor homes 'as is reasonably practicable' achieve a minimum energy efficiency rating of Band C by 2030, it is recommended that a new strategy is adopted. This will ensure that Haringey has a co-ordinated approach to alleviate fuel poverty providing a focus for action and ensuring limited resources are put to best use.

6.4 The proposed Affordable Energy Strategy 2020-2025 builds upon previous and existing fuel poverty interventions. However it has a wider scope than previous strategies. This is in recognition that being unable to adequately power a home for lighting, heating, communication can also have an adverse impact on the occupants health, academic attainment and general wellbeing. The strategy also acknowledges that the increasing impacts of climate change will increase overheating risks and that making homes more energy efficient can introduce further overheating problems. Its vision is *"To reduce the number of households struggling to afford to adequately power their homes and improve the health and wellbeing of residents by:-*

- *Improving the energy efficiency of housing and reducing overheating risks,*
- *Connecting residents to support services and initiatives to overcome the many causes of fuel poverty, such as energy prices, low incomes and unemployment."*

6.5 The draft strategy sets out the following objectives to deliver this vision:-

6.5.1 Increase the number of struggling households receiving energy advice and expanding the support available to create a people-centred solution

Fuel poor households may be dealing with a multitude of issues and developing a support network which tackles more than energy efficiency and which focuses on the people rather than just the property would be beneficial. This would meet the recommendations made by the National Institute of Health and Care Excellence (NICE NG6 guidelines¹), which advocates providing a one-stop advice service.

A trusted and well publicised energy advice service will provide a focus point ensuring fuel poverty interventions have a wide reach throughout the borough. To be effective a referral network will need to be developed through engagement with relevant health, community and housing services which can work together to offer a package of services to eligible residents helping to address their needs and improve their circumstances. An overall assessment of people and their homes and an effort to prioritise requirements could result in the people most in need receiving a package of solutions taking significant steps to lift them out of fuel poverty.

6.5.2 Improve housing energy performance to reduce fuel poverty, cold homes and overheating

¹ [NICE NG6 Excess Winter Deaths and illness and the health risks associated with cold home. March 2015](#)

The refurbishment of existing homes is one of the most effective means of reducing fuel poverty. Households with a lower energy efficiency band have a higher likelihood of being fuel poor. Energy performance certificate ratings range from band A, with 92-100 SAP² points (the most efficient) to band G, with 1-20 SAP points (the least efficient). Band G properties are twice as likely to be fuel poor with fuel costs 3 times higher than the most efficient properties.

The strategy sets a target to meet the national fuel poverty standards by ensuring as many fuel poor homes as practically possible reach an energy efficiency rating of Band D by 2025. It is estimated that there are over 25,000 homes in the borough with energy efficiency bands of E, F and G. 22% of all households living in E, F and G rated properties are likely to be fuel poor so that it can be estimated that over 5,500 households within the borough are living in the least energy efficient properties.

6.5.3 **Maximise the funding and resources secured within Haringey to alleviate fuel poverty**

Nationally there is a significant funding gap for energy efficiency measures in fuel poor homes. The Committee on Fuel Poverty estimated in 2018³ that there are funding gaps of £2.4 billion to achieve the governments 2025 target to ensure that as many fuel poor homes as is reasonably practicable achieve a minimum energy efficiency rating of Band D. Haringey will, therefore, need to ensure it is sufficiently prepared to secure funding opportunities as they arise. To do this the strategy suggests creating a pipeline of ready to go projects, with identified delivery/research/financial partners.

6.6 Haringey faces a number of challenges in delivery of this strategy. These challenges include:-

- 6.6.1 Identification and targeting of fuel poor homes can be difficult and will require better use of available data ie reviewing information coming from our referral activities and analysing datasets such as energy performance certificates and energy consumption data.
- 6.6.2 Difficulty in engaging fuel poor households. Creating and maintaining an effective referral network will be key to overcoming this but will require continued effort and effective communication.
- 6.6.3 Competition for external funding streams will be high but will be required to deliver the required level of retrofit. Ensuring that there is a pipeline of ready to go projects, with identified delivery/research/financial partners will

² Standard Assessment Procedure - A **SAP Rating** is a way of comparing energy performance of different homes – it results in a figure between 1 and 100+ (100 representing zero energy cost and anything over means you are exporting energy). The higher the **SAP rating**, the lower the fuel costs and the lower the associated emissions of carbon dioxide.

³ [Committee on Fuel Poverty annual report: 2018](#)

ensure that Haringey is well placed to secure any funding that becomes available.

- 6.6.4 Within the Borough Plan, the Council committed to explore setting up a local or regional energy savings company to serve the community and tackle fuel poverty. Current thinking is that this will be a decentralised energy network (DEN) company which will also deliver on the Borough Plan commitment for the Council to lead on setting up an energy network supplying sustainable energy.
- 6.6.5 The Council is currently exploring setting up neighbourhood DENs focussed around the new developments in North Tottenham, Tottenham Hale and Wood Green (see below for more detail) with a long-term plan to connect to the Energy Recovery Facility in Edmonton and build a network spanning into Hackney. The first phase of the 3 neighbourhood schemes would serve around 2,000 homes in each location. The proposed company's customers will be determined by geographic circumstances rather than by their fuel poverty status. The proposal is to charge customers a fair price of heat (to be no more than it would cost to run a domestic gas boiler, the prevailing heating system in the UK) but to run the company for profit; profits would be ring-fenced for the Council to fund fuel poverty work.
- 6.6.4 The housing stock within Haringey holds a relatively high proportion of:-
- solid walled properties where insulation measures are expensive to fit and for this reason they have often been overlooked by previous funded schemes. The number of properties within the borough with solid walls is estimated at over 68,000 these are dispersed across the centre of the borough. Bruce Grove, Alexandra, Harringay and Muswell Hill in particular are notable for high concentrations of uninsulated solid walls.
 - flats (54%). These can be more complex to retrofit and can be more difficult to cool in hot weather. Additionally some measures such as external wall insulation or energy efficient glazing will require agreement from tenants, leaseholders and freeholders.
 - privately rented – (around a third of Haringey homes). Landlords have little incentive to improve the energy efficiency of their properties as they do not receive the savings on energy bills. The strategy suggests engaging with those working within the private rented sector, revising minimum property standards, seeking grant funding and utilising enforcement and licencing conditions to stimulate property upgrades.
 - Council housing stock has an overall Average Energy efficiency rating of Band D (SAP⁴ 9.92 rating – 65.4). Bringing all of the Council Housing stock up to an EPC Band D by 2025 will have a financial impact on the Council. These costs are being built into the current

⁴ The Standard Assessment Procedure (SAP) is the methodology used to assess and compare the energy and environmental performance of properties. A SAP calculation indicates a score from 1 to 100+ for the annual energy cost. The higher the score the lower the running costs, with 100 representing zero energy cost.

Housing Revenue Account and Medium Term Financial Strategy process. The strategy includes an action to work with Homes for Haringey to determine budget requirements and develop a retrofit programme to improve the energy efficiency of existing housing stock.

- 6.7 The 2015 Energy Efficiency Regulations Minimum Energy Efficiency Standards for England and Wales set out that from April 2018, private landlords were not permitted to *re-let* existing rented homes rated EPC F or G unless exemptions apply and from April 2020 domestic private landlords will not be able to continue letting properties with an EPC rating of F or G. The Council is currently considering how it can enforce on these regulations.
- 6.8 Despite the challenges, Haringey already has a number of initiatives to build upon including:-
- An existing energy one stop advice service provided by The Seasonal Health Intervention Network (SHINE) London and LEAP (Local Energy Advice Partnership). These services are currently fully funded by energy supply companies or the Mayor of London.
 - A number of active and engaged community group schemes, for example Public Voice Haringey who are working with the Council to deliver a UK Power Networks funded project to increase the number of residents referred to SHINE London through their volunteers and 8 energy advice events over the next year.
 - The availability of a housing stock assessment tool (Crohm) to design and implement strategic retrofit programmes and prepare for funding bid opportunities.
 - Previous experience of managing large-scale retrofit schemes and successfully engaging private rented sector landlords in energy retrofit during the Smart Homes project.
- 6.5 The draft Affordable Energy Strategy has been developed through collaboration with council services and community groups who deal directly with those struggling to pay their energy bills or suffering with related health conditions. On 22 May 2019 a Fuel poverty community workshop was held with Durham University and SHINE London to discuss the proposed strategy, engagement and support available for residents in the borough. A cross section of community representatives attended including those supporting residents with mental health issues, low income families, carers, learning disabilities and food poverty. It has also been informed by previous fuel poverty research projects carried out in the borough with Durham University.
- 6.6 It is recommended that the strategy undergoes a 12 week consultation period (December 2019 – March 2020). The process of developing the strategy and subsequent consultation exercise will promote cross-community participation, co-operation and wider ownership of the strategy.
- 6.7 The strategy will be made publicly available on the Haringey website and respondents will be able to submit their response to questions online. The consultation will be promoted through social media channels.

- 6.8 For those without internet access, it is planned to conduct a series of focus group meetings at various locations across the borough including at Libraries, Children's Centres, Faith group and resident association meetings.
- 6.9 Public consultation will be completed in March 2020. All feedback will be reviewed and amendments made to the Strategy where appropriate.
- 6.10 The final strategy will return to Cabinet for approval and adoption June 2020.
- 6.12 The strategy will be delivered through collaboration between Council Services and partnerships with community groups and external organisations. Delivery will be led by Carbon Management. Progress will be publicly reported annually through the Annual Carbon Report and bi-annually to government through Home Energy Conservation Act (HECA) reports.

7. Contribution to strategic outcomes

- 7.1 This strategy supports the Borough Plan by driving up the quality of housing for everyone (Housing), promoting health and wellbeing (People) and delivering a reduction in carbon emissions (Place). This strategy will also assist the delivery of other Council priorities including the Fairness Commission, Housing, Air Quality and Carbon Reduction.

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

8.1 Finance:-

The report requests Cabinet to approve the draft Affordable Energy Strategy and for the Council to engage in public consultation. The Strategy proposes a number of actions to achieve the 4 objectives as set out above.

There are financial implications for the council in relation to the adaptation of the Council's housing stock (existing and new). The potential financial implications of these are being considered in the current process to update the (draft) HRA Budget 2020/21 and 2021/25 MTFS and this will determine the extent and timing of Council's HRA resources to address this strategy.

The Council intends to bid for funding streams as they become available to assist owner occupiers and private-rented tenants, whilst utilising the Minimum Energy performance regulations to encourage landlords to upgrade their properties. The Council will also take advantage of Mayor of London funding for provision of the Energy Advice service and free training opportunities provided by the NEA. The strategy sets out (in objective 4) how the Council will prepare to ensure that funding is secured successfully.

Any proposed initiatives will be subject to individual financial appraisals. The extent of external funding available will play a major part in determining the extent to which the Council can deliver its affordable energy strategic objectives.

8.2 Procurement

Strategic Procurement has read the report and the accompanying affordable energy strategic report and concurs with the policy of trying to secure free

funding from wherever possible . Clearly, free funding is a very desirable outcome for the Borough of Haringey. Strategic Procurement, of course, also strongly supports the attempts to alleviate fuel poverty from the Borough of Haringey . The situation appears to be worsening and it is desirable and humanitarian to correct this situation as expediently as possible. Strategic Procurement is also in agreement with the reports comments of accessing funding to facilitate a reduction in fuel poverty across the Borough. Strategic Procurement confirms that any procurement activities related to this report will be managed via the correct, compliant route to market. Strategic Procurement is ready to support any further developments / initiatives apropos fuel poverty as and when they arise.

8.3 Legal comment

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

The Affordable Energy Strategy 2020 – 2025 will assist in compliance with the objectives in the Warm Homes and Energy Conservation Act 2000, National targets in the Fuel Poverty (England) Regulations 2014 and the Government's Fuel Energy Strategy 2015 which is currently the subject of consultation.

As public consultation was undertaken for the previous Affordable Warmth Strategy 2009 – 2019 there is a legitimate expectation that there will be public consultation on the Affordable Energy Strategy 2020 – 2025.

In the case of *R (Moseley) v Haringey* the Supreme Court endorsed the following general principles of consultation:

- That consultation must be at a time when proposals are still at a formative stage;
- That the proposer must give sufficient reasons for any proposal to permit intelligent consideration and response;
- That adequate time must be given for consideration and response; and
- That the product of consultation must be conscientiously taken into account in finalising any proposals.

The consultation must be conducted in accordance with these principles.

8.4 Equality

A full Equality Impact Assessment (EqIA) has been carried out and is attached.

The EqIA process did not identify any issues which would have an adverse or differential impact on protected groups. Officers will continue to monitor for any equalities implications and modify the proposed initiatives to mitigate any issues which arise.

9. Use of Appendices

Affordable Energy Strategy 2020-2025 – appendix 1

Affordable Energy EqIA – appendix 2

10. Local Government (Access to Information) Act 1985

[Haringey's Affordable Warmth Strategy 2009-2019](#)

[Fuel Poverty Strategy For England \(Cutting the Cost of Keeping Warm\) 2015](#)

[Mayor of London fuel poverty action plan](#)

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Affordable Energy Strategy 2020-2025

London Borough of Haringey

V1 – October 2019

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- Foreword from Councillor Kirsten Hearn

Tackling fuel poverty will help develop of a fairer Haringey. Over 15,000 households in the borough struggle to pay their energy bills and can face the difficult decision of switching off appliances or heating to manage household finances. Living this way can have a huge impact on the health and wellbeing of our residents, the academic achievements of our children and ultimately more demand on public services. Tackling fuel poverty should therefore be a priority. One which is even more important with the ever-increasing impact of climate change and the urgent need to reduce carbon emissions from our homes.

Haringey's Affordable Energy Strategy sets out our 5 year plan to improve the energy efficiency of homes in all tenures. However, energy efficiency on its own will not eradicate fuel poverty. Only by developing partnerships and working collaboratively can we hope to reduce the high levels of fuel poverty in the borough. The aim is therefore to develop a referral network throughout the borough with the ability to offer a variety of support services with a borough-wide reach.

Unlike previous Affordable Warmth Strategies, the risk of overheating and the associated health impacts are considered. Some climate changes are now believed to be inevitable, regardless of a reduction in carbon emissions. Overheating risks are therefore expected to increase and there is a real possibility of creating problems for the future if action is not taken to mitigate these risks when building new homes or the modifying existing homes.

We would like to thank everyone involved in developing this strategy. We are particularly grateful for the support and research undertaken by Durham University which has helped shape this strategy. There is no single intervention or easy win to eradicate fuel poverty but by working together we can make a real difference.

- Partnership Statement, Durham University

Haringey's new Affordable Energy Strategy is the result of joint enquiry between researchers from Durham University and Haringey's Carbon Management team. The Strategy is based on a careful appraisal of efforts to address what is commonly referred to as fuel poverty through a diverse range of activities and funding programmes, some of which were delivered by the Council and the remainder by civic and grass-roots organisations. We mapped these various delivery channels as a system to see how communication and coordination among them worked. We held a dialogue with partners about how to improve integration of efforts among community organisations and between them and the Council, all of which can lead to better ways of finding and interacting with people most in need of support.

During this work we came to prefer the concept of *energy affordability* to refer to households that struggle to afford adequate energy provision. The term advances the concept of *fuel poverty*, with its restricted emphasis on the provision of warmth. Energy affordability firmly acknowledges the overriding significance of warmth, but also recognises cumulative effects on households when they cannot afford to buy energy for washing clothes, cooking, personal hygiene, communication, entertainment, education and job search. We listened to members of the local voluntary sector talk about their relations with residents living in energy inefficient homes and studied how these organisations helped people deal with negative impacts on income, health and wellbeing often affecting entire families. We visited homes to better understand problems faced by residents at risk of spending too great a proportion of income on energy.

We thank all the people who joined us in this exploration of energy vulnerability in Haringey; especially the local volunteers who were trained to assist with interviewing, the residents themselves, and the members of community organisations who were so generous with their time. The holistic picture they helped us to construct was used to diagnose problems and barriers to progress, make recommendations and test them again through further dialogue. All this jointly produced learning provided new insights for designing the Strategy and set an example of co-operative, cross-sector working that will assist its delivery at community level.

Prof Sandra Bell

Department of Anthropology, Durham University

1. Executive Summary

This five-year Affordable Energy Strategy replaces our previous Affordable Warmth Strategy. This is in recognition that fuel poverty goes beyond cold homes and related health effects. We are seeing stronger evidence that the ability to adequately power household appliances, lighting and communication equipment can impact academic attainment, digital inclusion, access to employment opportunities and increase social isolation. We also recognise that in a changing climate, there is a need to keep homes cool during periods of high temperatures as well as warm in winter. Which we are already seeing in new homes due to high levels of insulation alongside the inclusion of larger windows. The health impacts of these events can be significant, particularly for the young, older and disabled people, or those with a long-term illness.

Housing (age, location, building type, tenure), income, employment, age and mobility (how often in the home and for how long each day) and digital access all effect fuel poverty. Taking a holistic approach to tackling these social determinants could reduce inequality and promote fairness in the borough.

This strategy supports the Borough Plan by driving up the quality of housing for everyone (Housing), promoting health and wellbeing (People) and delivering a reduction in carbon emissions (Place). This strategy will also assist the delivery of other Council priorities including Housing, Air Quality and Carbon Reduction, as well as the emerging recommendations of the Fairness Commission. It also ensures compliance with the Home Energy Conservation Act 1995.

The strategy has been developed through collaboration with council services and community groups who deal directly with those struggling to pay their energy bills or suffering with related health conditions. It has also been informed by previous fuel poverty research projects carried out in the

<p style="text-align: center;">Haringey's Affordable Energy Strategy</p> <p style="text-align: center;">Vision</p> <p>To reduce the number of households struggling to afford to adequately power their homes and improve the health and wellbeing of residents by:-</p> <ul style="list-style-type: none"> • Improving the energy efficiency of housing and reducing overheating risks, • Connecting residents to support services and initiatives to overcome the many causes of fuel poverty, such as energy prices, low incomes and unemployment.
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borough with Durham University.

This vision will be delivered by the following objectives:-

- Objective 1. Increase the number of struggling households receiving energy advice and expand the support available to create a people-centred solution
- Objective 2. Improve housing energy performance to reduce fuel poverty, cold homes and overheating
- Objective 3. Maximise the funding and resources secured within Haringey to alleviate fuel poverty

It is proposed that the success of this strategy will be measured on whether, by 2025, within Haringey:-

- There is an active referral and advice service which identifies and assists the most vulnerable and hard to reach residents. Over 1,500 residents have received support.
- Housing stock data has been used to develop an action plan to retrofit as many fuel poor homes 'as is reasonably practicable' to a minimum energy efficiency rating of Band C by 2030.
- Overheating risks are fully considered in the design of new builds and energy efficiency retrofit projects.
- The number of interventions available to residents through a referral to the energy advice service has increased. The palette of services available aims to provide a holistic, people-centred solution to fuel poverty. It includes advice on employment, income maximisation, health and wellbeing advice.
- Partnerships have been developed to secure funding to deliver the retrofit action plan.

2. Introduction

“Energy vulnerability” is a recognised term that highlights that some households find it difficult to adequately power their homes which adversely affects their daily life and health. This can be caused by a variety of factors including the complexity of energy pricing, difficulties around engaging with energy suppliers and increased household energy requirements. It incorporates fuel poverty, in England fuel poverty is currently measured using the low income-high cost definition, which states that a household is in fuel poverty if:

- Their income is below the poverty line (taking into account energy costs) and;
- Their energy costs are higher than is typical for their household type

Overheating problems can affect the same groups that are at risk from fuel poverty. However rather than focus on keeping warm in winter, its cause is the requirement to keep cool in the summer months. To manage this risk from overheating residents often require measures such as air conditioning to ensure their health and safety, as the building design is already set. But an air conditioning unit can cost around 50 pence an hour to cool a small room. Therefore, over a summer 3 month season a home could easily end up paying close to £3,000 to cool a top floor 3 room flat with a mobile air conditioning unit.

Properties at most risk of fuel poverty are those: -

- with an Energy Performance Certificate (EPC) rating of E, F or G.
- built pre 1944
- in the private rented sector
- fitted with an electricity pre-payment meter.

Properties at most risk of overheating are: -

- Converted flats or newly built blocks of flats
- Flats facing east/west/south and with a single aspect

In both situations the households most at risk include those with:

- low incomes.
- elderly occupants
- children under the age of 16.
- occupants with disabilities or suffering from a long-term illness.
- occupants confined to home during long periods of the day

Excess seasonal temperatures (extreme hot and cold) can adversely affect health particularly in the young and elderly and those with cardio-vascular and respiratory diseases. Mental health can also be negatively affected by fuel poverty and cold housing. More than 1 in 4 adolescents living in cold housing are at risk of multiple mental health problems, whereas only 1 in 20 adolescents who have always lived in warm housing are at risk of multiple mental health problems.¹ These effects increase the demand for health services such as GP and hospital visits. Estimates suggests that each local Health and Wellbeing board spends around £9.8m per year treating the illnesses associated with cold homes.

¹ [The Health Impacts of Cold Homes and fuel poverty, Marmot Review and Friends of the Earth](#)

Whilst overheating is also a problem, in the UK we do acknowledge that it is on a smaller scale to that caused by cold homes in winter. However, during the summer heatwave in Northern France in August 2003, high temperatures for a period of three weeks resulted in 15,000 excess deaths. The vast majority of these were among older people. Research after the heatwave event revealed that at least 50% of these deaths could have occurred due to exposure to heat in people's homes. Across England and Wales that same year, there were over 2,000 excess deaths during the ten-day heatwave in August 2003, compared to the previous five years over the same period. Again, the worst affected were people over the age of 75 years². Climate change predictions suggest that such heatwaves will increase and as we strive to retrofit and build energy efficient, airtight buildings to reduce fuel poverty and provide warm homes we could inadvertently increase overheating issues if action is not taken.

The wider social impacts of fuel poverty include:

- social isolation with people not wanting to invite people into their cold/damp homes
- links between hot weather and higher levels of street violence and social unrest³
- poor academic attainment due to time off school through illness or inability to find a warm, lit environment or computer access to study.
- negative impacts on dietary opportunities and choices
- increase in risky behaviours (early alcohol or tobacco use, truancy) as young people try to find respite and privacy in other venues outside their home.⁴

Improving the energy efficiency of homes, reducing energy costs and improving incomes assist residents to adequately heat their homes in cold weather and reduce damp and mould. Appropriate insulation measures, shading and adequate ventilation can minimise heat gains in the summer months. These improvements will decrease the cause of preventable health and education inequalities, reduce healthcare costs and support carbon reduction ambitions.

² OVERHEATING IN HOMES – THE BIG PICTURE Zero Carbon hub 2015

³ Rotton and Cohn, 2000

⁴ [National Children's Bureau, Fuel Poverty What it means for Young parents and their children](#)

3. Energy Poverty - Context and Policy

3.1 a Energy poverty in England – The National Context

- In 2017, the number of households in fuel poverty in England was estimated at 2.53 million, representing approximately 10.91% of all English households.
- In the 2017 to 2018 winter period, there were an estimated 50,100 excess winter deaths in England and Wales. Estimates suggest that some 10% of excess winter deaths are directly attributable to fuel poverty and 21.5% of excess winter deaths are attributable to the coldest 25% of homes.
- The summer of 2018 saw 4 heatwaves (3 Level-3 heatwave alerts issued by the Met Office and 1 heatwave where the mean Central England Temperature (CET) was greater than 20°C). The total estimate of excess deaths over this period was 863⁵.

3.1 b Energy Poverty in England - Policy

The government's Fuel Poverty Strategy For England (Cutting the Cost of Keeping Warm) 2015 and Fuel Poverty Regulations (England) 2014 set a target to ensure that as many fuel poor homes 'as is reasonably practicable' achieve a minimum energy efficiency rating of Band C by 2030.

Interim milestones have also been set to ensure 'as many fuel poor homes as is reasonably practicable' achieve a minimum energy efficiency rating of Band E by 2020, and Band D by 2025. The phased approach follows a principle of prioritising assistance to those in the deepest levels of fuel poverty.

The Third Annual Report (2018) from The Committee on Fuel Poverty (CFP) advises that progress on these targets is stalling. Since the strategy was introduced in 2014/15 the number of households in fuel poverty has risen although the fuel poverty gap has reduced by 7%. It estimates that the funding required to meet the strategy is £17.1 billion and emphasises the importance of:

- identifying individual households in fuel poverty and directing funding appropriately.
- targeting the private rented sector to ensure properties meet minimum energy efficiency standards

Energy Company Obligation (ECO) is an obligation that government has placed on the larger energy suppliers to reduce the UK's energy consumption by funding domestic energy efficiency improvements.

The current scheme, called ECO3, began in December 2018. It runs until 31 March 2022 and is focused exclusively on those customers with lower incomes, considered to be in vulnerable situations or living in fuel poverty.

Under ECO3, energy suppliers are able to meet up to 25% of their obligation under a local authority's "flexible eligibility" mechanism. This has an estimated value of around £560m over the obligation period.

Under ECO "flexible eligibility", local authorities can declare certain households meet the eligibility criteria for a measure. It is intended to help two groups of households:

- Fuel poor households, especially those that are not in receipt of ECO eligible benefits; and
- Low income households that are susceptible to the effects of living in a cold home. For example, households who have physical and/or mental health issues caused or exacerbated

⁵ Source [PHW Heatwave Mortality Monitoring: Summer 2018](#)

by living in a cold home. This approach relies on local authorities having mechanisms in place to identify such households, for example GP or hospital referrals.

The 2015 Energy Efficiency Regulations Minimum Energy Efficiency Standards for England and Wales.

From April 2018, private landlords were not permitted to *re-let* existing rented homes rated EPC F or G unless exemptions apply. Local authorities are expected to enforce these regulations.

From April 2020 domestic private landlords will not be able to continue letting properties with an EPC rating of F or G.

Housing Health Safety Rating System (HHSRS)

The housing health and safety rating system (HHSRS) is a risk-based evaluation tool to help local authorities identify and protect against potential risks and hazards to health and safety from any deficiencies identified in dwellings. It was introduced under the Housing Act 2004 and applies to residential properties in England and Wales. It assesses 29 housing hazards and the effect that each may have on the health and safety of the occupants. The 29 hazards include excess cold and excessively high indoor air temperatures.

Public Health Outcome Framework

This includes a direct duty on upper tier local authorities to tackle fuel poverty (1.17) and reduce Excess Winter Deaths (4.15).

NHS Five Year Forward View

The NHS Five Year Forward View outlines three areas of focus to address the widening gap between resources and demands on services. Central to this is a shift towards emphasis on prevention and working in partnership. The 44 Sustainability and Transformation Partnerships (STPs), which link the NHS with local authorities across the UK, are likely to play a key role in the move towards this. The NHS Five Year Forwards plan strengthens the case for NHS involvement in tackling ill health due to cold homes and unaffordable bills.

NICE (National Institute of Health and Care Excellence) guideline NG6 Excess winter deaths and illness and the health risks associated with cold homes

This guideline covers reducing the health risks (including preventable deaths) associated with living in a cold home. It recommends:

- developing a strategy for people living in cold homes
- identifying people at risk from cold homes
- provide tailored solutions via the single- point-of-contact health and housing referral service for people living in cold homes
- training practitioners to help people with cold homes
- raising awareness of how to keep warm at home
- ensuring buildings meet required standards

3.2 a Energy poverty in London - Context

- In 2017 there were 397,924 households living in fuel poverty in London (around 11.8% of the households in London.)
- Between 2011 and 2016 there were 13,390 excess winter deaths in London
- During the 4 heatwaves in the summer of 2018 there were 468 excess deaths in London.

3.2 b London Policy - Fuel Poverty Action Plan for London

The Mayor of London, has set up the Fuel Poverty Partnership, working together with experts across the health, social justice and environment sectors to guide London's work on fuel poverty. The Fuel Poverty Partnership brings together stakeholders from sectors including local government, social housing, landlords, tenants, health, social care, academic, charities, energy suppliers and the energy efficiency industry. The group will not only assist the Mayor in delivering fuel poverty support but also work across support services to identify households living in fuel poverty.

The London Fuel Poverty Action Plan proposes the following actions: -

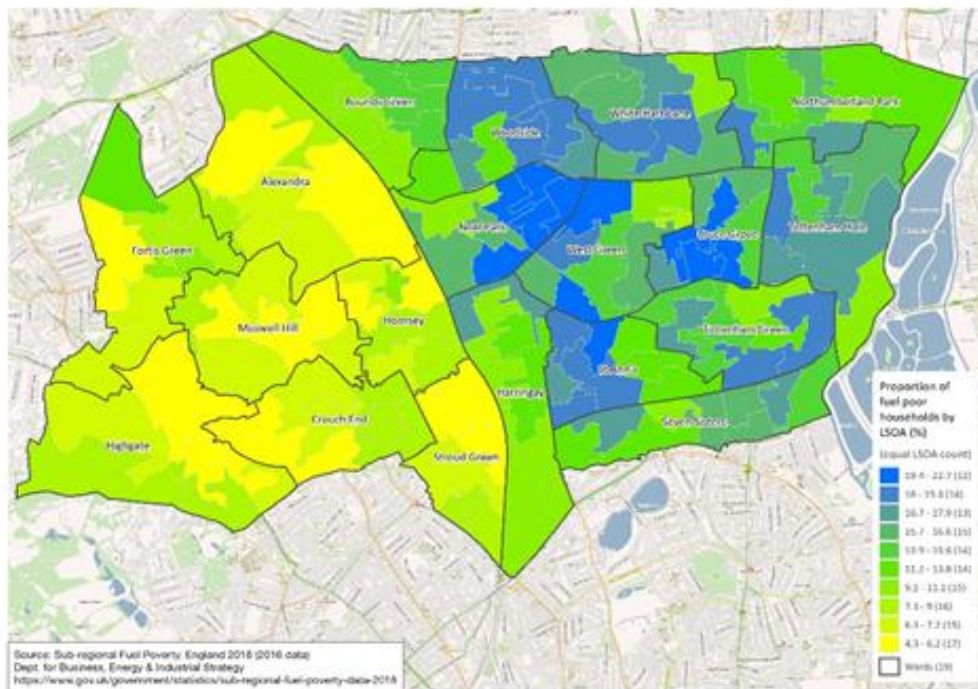
1. Boosting the incomes of people in fuel poverty by supporting benefits uptake campaigns, referral services and programme that provide advice and support to the fuel poor.
2. Providing up to £500k to support the creation or local advice referral networks.
3. Increasing the energy efficiency of London homes and earmarking over £10m to energy efficiency delivery programmes
4. Targeting the private rented sector
5. Providing access to fairer energy tariffs through the delivery of an energy supply company

3.3 Energy Poverty in Haringey - Context

- In 2017 there were 15,189 households living in fuel poverty in Haringey; this was 14.5% of the households in the borough. This is the 4th highest percentage in London and substantially above the London average (11.8%).
- In Haringey there were 100 Excess winter deaths⁶ (EWD) in 2016/17 and 60 in 2015/16.
- The proportion of households in fuel poverty is highest in the east of the borough particularly Noel Park and Bruce Grove wards. (see fig. 1)
- In the summer built up areas act as a 'heat islands' where temperatures can be as much as 10°C higher than elsewhere. This effect is most evident in the north-east of the borough and Northumberland Park specifically.
- It is projected that for every excess winter death (EWD), there are also around 8 admissions to hospital, 32 visits to outpatient care and 30 social services calls (Age UK, 2011). With 100 EWD in Haringey over the winter of 2016/17 this would equate to 800 hospital admissions, 3200 outpatient visits and 3000 calls to social services.

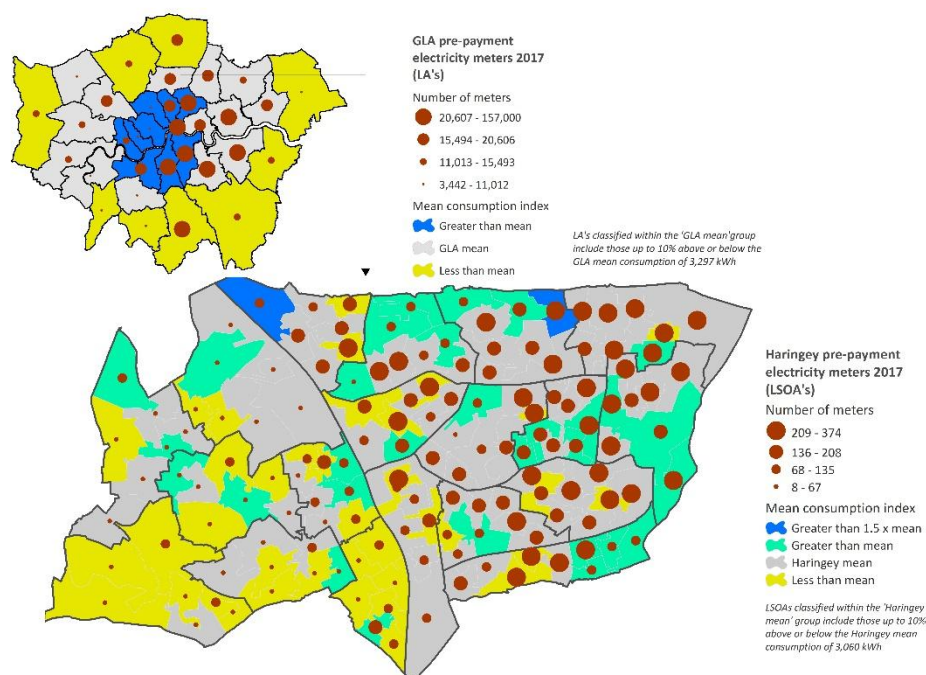
⁶ **Excess winter deaths**, the ratio between average daily deaths in December–March versus other months, is a measure commonly used by public health practitioners and analysts to assess health burdens associated with wintertime weather.

Fig 1: Incidences of Fuel Poverty in Haringey



- People on prepayment meters pay more for their fuel because prepayment tariffs are more expensive than other payment methods. There are 20,518 prepayment meters in Haringey, this is the 9th highest volume in London and represents 4% of all prepayment meters. This is notably greater than the London average of 15,421. Figure 2 shows the vast majority of LSOAs with high numbers of prepayment customers located in the east half of the borough (large brown circles).

Fig 2 GLA and Haringey prepayment electricity: number of meters and mean consumption (kWh) for both London (by borough) and Haringey by LSOA.



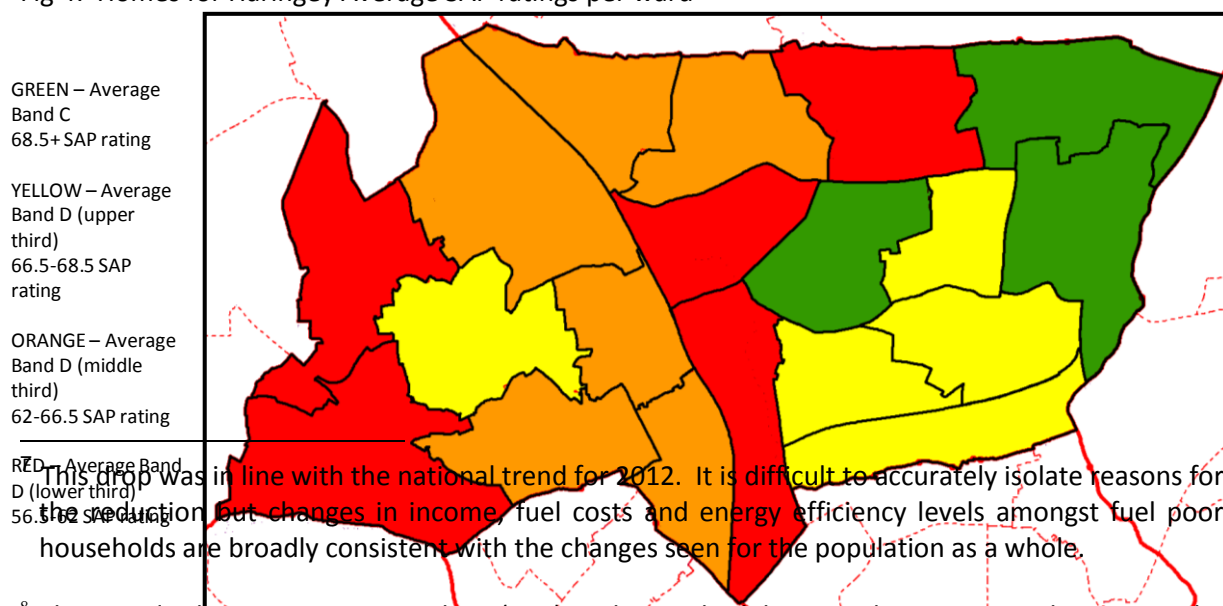
Challenges for Haringey

- The number of households experiencing fuel poverty is not improving.

Year	Haringey % of households in fuel poverty	London % of households in fuel poverty
2017	14.5%	11.8%
2016	12.6%	10%
2015	12.6%	10.1%
2014	13.3%	10.6%
2013	11.9%	9.8%
2012	10.1%	8.9% ⁷
2011	11.2%	9.9%

- Many homes in Haringey are defined as hard to treat, meaning that insulation measures are expensive to deliver in homes that are expensive to heat.
- The housing stock within Haringey holds a relatively high proportion of flats (54%). These can be more complex to retrofit and can be more difficult to cool in hot weather.
- The private rented sector is growing: a third of Haringey residents already rent privately.
- Council housing stock has an overall Average SAP⁸ 9.92 rating – 65.4 (EPC Band D). Of the 29 London boroughs which own housing stock, 15 boroughs have an average C band rating and 13 an average band D.

Fig 4: Homes for Haringey Average SAP ratings per ward



⁸ The Standard Assessment Procedure (SAP) is the methodology used to assess and compare the energy and environmental performance of properties. A SAP calculation indicates a score from 1 to 100+ for the annual energy cost. The higher the score the lower the running costs, with 100 representing zero energy cost.

3.3 b Energy Poverty in Haringey Policy

Many Council policy and strategy documents reference energy poverty. The following Strategies and Action Plans supports this document in addressing energy poverty in the borough's households.

The Haringey Borough Plan 2019 - 2023

The Borough Plan sets out Haringey's priorities until 2023. Consultation with residents highlighted that housing was a top priority; along with the safety of young people and tackling poverty and inequality whilst strengthening the local economy. The plan includes an objective to explore setting up an alternative local or regional energy savings company that would serve our community by helping to tackle fuel poverty.

Haringey's Housing Strategy

The Housing Strategy 2017-2022 set out Haringey's vision for housing in Haringey from 2017 to 2022. It has four key strategic objectives which includes driving up the quality of housing for all residents and a priority to improve energy efficiency and reduce carbon emissions and fuel poverty. This strategy is currently being revised.

Haringey's Health and Wellbeing Strategy

This sets out a vision and action plan to work with communities and residents to reduce health inequalities and improve opportunities for all children, young people and adults to live health, fulfilling and long lives.

Haringey's Local Development Framework (LDF)

Haringey's LDF provides detail on policy implementation to help ensure new development is delivered to a high sustainable design and construction standard. All new developments are expected to demonstrate that their heating, cooling and power systems have been selected to minimise carbon dioxide emissions. The need for active cooling systems should be reduced as far as possible through passive design including ventilation, appropriate use of thermal mass, external summer shading and vegetation on and adjacent to developments. The heating and cooling systems should be designed to connect to decentralised energy networks - including linking to existing networks where feasible, and/or be designed to have the capacity to connect to future networks.

3.3c Haringey Fairness Commission

The aim of the Commission is to develop practical recommendations on how the council - working with others - can tackle inequality and promote fairness in the borough.

The Commission is focusing on a range of themes, which have a clear link to reducing inequality and promoting fairness. It includes the cost of household energy and fuel poverty. The final Commission recommendations are due for publication in Autumn 2019.

3.3d Haringey Zero by 2050 commitment

Haringey's aim is to reach zero carbon emissions by 2050. To reach this target most homes, regardless of tenure, will need to be retrofitted to improve their energy efficiency.

3. Objectives and actions

OBJECTIVE 1: **Increase the number of struggling households receiving energy advice and expand the support available to create a people-centred solution**

TARGET: 1,500+ referrals are made between 2019-2025. 40% of these referrals should be from households with an occupant with a long-term health condition or a child under the age of 16

Even with perfect targeting and the provision of energy efficiency measures some households will remain in fuel poverty. This is due to a combination of factors including: -

- low incomes
- the increasing cost of energy
- the way energy is used in the home

These households may be dealing with a multitude of issues and developing a support network which tackles more than energy efficiency and which focuses on the people rather than just the property would be beneficial. This would meet the recommendations made by the National Institute of Health and Care Excellence (NICE NG6 guidelines⁹), which advocates providing a one-stop advice service.

A trusted and well publicised energy advice service will provide a focus point ensuring fuel poverty interventions have a wide reach throughout the borough. To be effective a referral network will need to be developed through engagement with relevant health, community and housing services which can work together to offer a package of services to eligible residents helping to address their needs and improve their circumstances. An overall assessment of people and their homes and an effort to prioritise requirements could result in the people most in need receiving a package of solutions taking significant steps to lift them out of fuel poverty.

Our priorities are to: -

- maintain a one-stop shop energy advice service
- create and maintain an effective referral service
- reach and identify residents in the most need
- increase the number of support services linked to the Energy Advice One Stop Shop service.
- assist residents to switch to cheaper energy tariffs
- promote behaviour change to reduce fuel bills and maintain a comfortable home

Maintain a one-stop shop energy advice service

Haringey has already partnered with Shine London for homeowners and private rented tenants and the LEAP (Local Energy Advice Programme) for Homes for Haringey residents. Both Shine and LEAP offer a “one-stop shop” support service. These provide support relating to energy efficiency,

⁹ NICE NG6 Excess Winter Deaths and illness and the health risks associated with cold home. March 2015

income, health and wellbeing and general housing. However, the referral network can be improved to increase the number of residents benefiting from the service and increasing the number of interventions available.

Shine LONDON (Seasonal Health Interventions Network) is funded by the Mayor of London and energy suppliers. Support includes eligibility checks for energy efficiency grant schemes, energy doctor visits, support with water and fuel debt, as well as referrals to Adult Services, health services such as flu clinics, London Fire Brigade for smoke alarms or the Police for security checks.

LEAP (Local Energy Advice Programme, Agility ECO) is funded by energy suppliers, as part of their Warm Home Discount (WHD) obligation. LEAP delivers an energy home visit to deliver free energy saving and switching advice, installation of simple energy saving measures or to arrange telephone advice to help with benefits and debt.

Case study: SHINE helped a resident who was on a low income and spending more than 10 per cent on his energy.

The resident suffered from long term health conditions, was responsible for twin children of school age and lived in temporary accommodation. The client approached SHINE having received letters threatening further action from the energy supplier if an outstanding gas bill of £160 was not paid in full. Due to the client health status and being at risk of disconnection, SHINE was concerned for the man's household wellbeing. With urgency, SHINE arranged an energy home visit to establish the status of his gas account. It was discovered that all previous meter reads were estimates. SHINE therefore submitted the latest meter read on the customer's behalf, which was much lower. **The bill was reduced to £9.90, a reduction of £150.10.** SHINE added him to his supplier's vulnerable person's registers. The gentleman stressed his need to become more independent, so SHINE also signposted the client to iWork.

In 2018, LEAP assisted 136 Homes for Haringey residents. This resulted in:

- 723 LED bulbs fitted
- 92 radiators fitted with reflectors
- 32 doors draught-proofed
- 24 shower aerators
- 20 door brushes fitted
- 13 letterbox brushes
- 10 windows draught-proofed
- 9 TV standby plugs

Leading to a total lifetime bill saving of £82,749.85 across all energy visits. Twelve people switched their gas tariff, saving £905 and sixteen residents switched their electricity tariff, saving £1035.

To achieve this, we will: -

- Improve partnership working with SHINE and LEAP by evaluating the effectiveness of referrals.
- Promote the existing service via existing council communication channels.

Create and maintain an effective referral network

An effective referral system is central to tackling fuel poverty. It should reach those most in need and connect them to the energy advice service.

Effective referral depends on a good network of referrers and service providers and a sound set of procedures to efficiently and effectively analyse needs and deliver services.

Haringey has a diverse range of community organisations who offer support and services that together address the multiple dimensions of fuel poverty. Their efforts would be enhanced by better collaboration and co-ordination so that they work together as a system and offer residents a palette of services to address their needs.

To achieve this, we will: -

- Engage with internal departments and external organisations to promote the Energy Advice Service ensuring that messages filtrate to all those engaging with the community.
- Provide training for frontline staff so that they are confident in identifying and assisting energy vulnerable residents.
- Ensure that the network reaches out to all members of the community for example, the elderly, working families, owner occupier, private sector tenants. The emphasis will be to reach those experiencing health issues and families with children.
- Maintain the network by providing feedback on the outcome of referrals.

Identifying and reaching the residents in most need

Many of those who experience fuel poverty can be described as 'hard to reach'. They may be isolated for one reason or another (including problems of physical and mental health) or they face linguistic or cultural barriers. Often their situation makes them wary of seeking support. The key to addressing fuel poverty at a community level is therefore to ensure that there is a variety of entry points. Once identified these residents should be connected to a range of services, activities and organisations that can address the variety of factors that produce their fuel poverty.

In the past fuel poverty schemes have successfully identified eligible residents using council data such as benefit data to identify eligible residents. However, there is a need to find ways to reach out to a wider group of residents including those in full time work. 35.7% of the fuel poor are in full-time employment.¹⁰

Part of this relates to efficiently and effectively collecting and analysing data and regularly assessing the changing demographics of the area. Bearing in mind that the likelihood and severity of fuel poverty depends on the characteristics of the households that live in the property. For example, single parent households are most likely to be fuel poor and couples with children have the largest

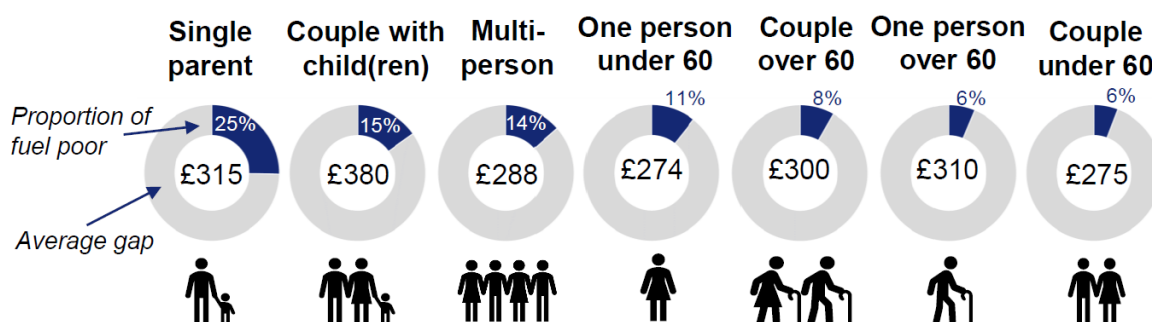


Figure 5

¹⁰ Fuel Poverty Statistics for England 2017

gap – see figure 5 below.¹¹

It also requires considering the long-term effects of energy poverty on certain social groups e.g. households that include children or people with existing health conditions to ensure our referral and communication activities target establishments that they frequent e.g. schools, health care facilities etc.

To achieve this, we will: -

- Draw on information coming from our referral activities
- Make use of increasingly available “big” data including analysing datasets such as energy performance certificates and energy consumption data
- Develop a communications campaign and engage with health and education services
- Liaise with community organisations already working with hard to reach clients or specific cultural groups.

Increase the number of support services linked to the Energy Advice One Stop Shop service.

Fuel poverty involves a range of interrelated factors and effects, dealing with them all are the people affected. Once they are referred to the Energy Advice service, they should ideally be connected to a range of services, activities and organisations that can address a multitude of issues.

SHINE and LEAP currently offer a package of generic support services in all London boroughs such as, referrals to energy efficiency schemes

- energy and water saving advice
- installation of free water saving measures
- support to eliminate fuel and water debt
- benefits maximisation for those eligible

However, within each boroughs the offer varies depending on the support available locally and level of engagement with local services and community organisations. By working to increase the number organisations and services linked to the Energy Advice One Stop Shop service Haringey will deliver an improved intervention for its residents for example services which address barriers to employment, improve health or support families.

To achieve this, we will: -

- Engage relevant council and local health services
- Develop a directory of relevant community organisations and services

¹¹ Fuel Poverty Statistics for England 2017

Assist residents to switch to cheaper energy tariffs

Switching energy suppliers to secure the best deal can be the last thing that households in crisis can find time to deal with. Some poorer households fear switching will incur financial costs or are anxious not to upset carefully designed coping strategies. Working with partners to provide a trusted means of switching or partnering with a supplier that will provide a fair deal to residents will remove the hassle factor associated with this process. For those who do switch, it is often the case that cheap deals are secured for the first year, but they are “rolled over” onto an expensive standard variable rate the following year. Partnering with a supplier to safeguard residents from this practice could ensure that the benefits of switching to a cheaper tariff are secured for the long term.

Households that pay for their energy through a prepayment meter are more likely to be fuel poor. There are over 20,500 households in Haringey on prepayment tariffs. Promoting the benefits of switching to a cheaper direct debit tariff or a more competitive smart prepayment meter could have a significant impact.

To achieve this, we will: -

- Create partnerships to offer residents a trusted switching pathway.
- Support the uptake of smart meters and smart meter prepayment meters with a competitive tariff.

The Selby Trust Big Energy Saving Network (BESN)

In 2017/18 the Selby Trust raised £8,000 external funding in partnership with London Sustainability Exchange to enable two Community Organisers to deliver the Big Energy Saving Network project, offering fuel poverty advice. This involved raising awareness of domestic users about switching to more cost effective energy companies. One success story resulted in an end user wiping out debt of over £2,500.

BESN was aimed at helping a wide range of people reduce their energy costs by providing personalised advice and information. By engaging with local events such as Haringey Advice Day in Muswell Hill, and holding stalls in public places, people can be provided with one-to-one information about the project and how much they can save.

Over 300 people were informed of this and at least 80 of them were trained to become front-line workers to pass on the information to family and friends and to network with communities and organisations that have experience in other fields.

Promote behaviour change to reduce fuel bills and maintain a comfortable home

How people use energy and their heating systems can influence fuel poverty. Householders can often stop using appliances or switch off heating to immediately impact their fuel bill rather than adopting on-going energy-efficiency behaviours to manage consumption. Condensation and mould issues can be made worse through household activities such as drying clothes indoors, switching off heating and covering vents. It is equally important that residents understand how the systems in their homes work so that they can operate them effectively. Providing information in the form of advice sheets or face-to-face conversations could therefore make a low-cost improvement to householders' fuel bills and comfort levels. Smart meter installations coupled with energy efficiency advice may offer another suitable source of advice and make energy and water consumption tangible.

To achieve this, we will: -

- Promote the one-stop energy advice energy doctor service
- Include education in funding bids and ask contractors to provide user-friendly information sheets and advice for newly installed energy efficiency measures
- Train frontline staff and community groups

- Investigate the benefits of promoting smart meter installations

Delivery of objective 1 will be resourced by: -

- Continuing to partner with advice services funded through the Mayor of London or Energy Suppliers
- Taking advantage of free training schemes provided by organisations such as National Energy Action (NEA)
- Making use of existing communication channels such as Haringey People, Haringey web pages
- Existing internal staff resources
- Seeking grant opportunities from BEIS or national charities such as the NEA
- Capital Projects
- Supporting community groups to bid for grant opportunities

OBJECTIVE 2: IMPROVE HOUSING ENERGY PERFORMANCE TO REDUCE FUEL POVERTY, COLD HOMES AND OVERHEATING

TARGET: To retrofit existing properties to meet the national fuel poverty standard ensuring that as many fuel poor homes ‘as is reasonably practicable’ achieve a minimum energy efficiency rating of Band D by 2025. Whilst ensuring that all new-build homes meet zero carbon standards onsite.

Many factors influence the root causes and effects of fuel poverty and to reduce fuel poverty our approach will need to focus on the people effected. This strategy aims to develop a people centred approach in the long term. However, initially the priority will be to ensure that household energy efficiency is not the sole cause of fuel poverty.

Our priorities are to: -

- Improve the energy efficiency of existing housing in all tenures.
- Encourage developers to build all new homes to zero carbon standards on-site
- Reduce the effects of overheating in new building designs and retrofitting programmes

Improve the energy efficiency of housing in all tenures

The refurbishment of existing homes is a great opportunity to reduce fuel poverty and carbon emissions. Households with lower energy efficiency bands have a higher likelihood of being fuel poor (see Fig 6). Energy performance certificate ratings range from band A, with 92-100 SAP points (the most efficient) to band G, with 1-20 SAP points (the least efficient). Band G properties are twice as likely to be fuel poor with fuel costs 3 times higher than the most efficient properties¹².

Fig 6 - **Required fuel costs for the least efficient properties are 3 times higher than costs for the most efficient properties**



Whilst the council can directly influence the energy efficiency of its own housing stock, it is will also work to encourage and enforce energy efficiency standards in homes in all tenures. This will include a focus on households in the private rented sector where incidences of fuel poverty are particularly high. 19.4% of households living in the private rented sector suffer from fuel poverty compared to 8% of owner-occupiers¹³.

Meeting the national standard of ensuring that as many fuel poor households ‘as is reasonably practicable’ achieve a minimum energy efficiency rating of Band C by 2030 will be challenging. The ultimate goal will for homes to be above a Band C to meet our carbon reduction ambitions. This will be even more onerous and dependent on the level of external funding available. We acknowledge that gas central heating systems are cheaper to run than electric heating and these may be installed to offer immediate financial relief and warm housing. Where funding allows, and it is appropriate for the

¹² [Beis Fuel poverty factsheet, England 2017](#)

¹³ [BEIS Fuel poverty factsheet, England 2017](#)

property, we will consider the use of electric alongside renewables. Such an approach will future proof installations from further work to meet carbon neutral targets. The challenge for Haringey will be to tackle the high number of hard to treat properties in the borough such as solid walled properties. Hard to treat properties mean that fitting insulation measures is expensive and for this reason they have often been overlooked by previous funded schemes. However, these properties require greater focus as they have the highest prevalence of fuel poverty. Properties with solid uninsulated wall had the highest proportion of households in fuel poverty, 16.8 per cent with an average fuel poverty gap of £420 – more than double that of those with insulated solid walls.¹⁴

Funding schemes typically have specific criteria with respect to both eligibility of households and the type of intervention offered. However, schemes which offer a new boiler for example will not necessarily offer the level of retrofit required to meet the national standards or move the occupier out of fuel poverty. To achieve this a package of works may be required and it would be preferable to take a whole house approach¹⁵. Where funding does not allow this, a register of works could be considered to revisit properties as more funding becomes available. Taking a whole house approach will reduce the risk of introducing unintended consequences for example, increased insulation and air tightness levels can increase condensation (leading to damp and mould) and overheating. All of which can have an adverse impact on the occupant's health and wellbeing.

To achieve this, we will: -

- work with Homes for Haringey to determine budget requirements and develop a retrofit programme to improve the energy efficiency of the Council's own existing housing stock.
- use a carrot and stick approach within the private rented sector. This will involve engaging with those working within the private rented sector, revising minimum property standards, seeking grant funding and using enforcement and licencing conditions to stimulate property upgrades.
- endeavour to source grant funding for owner occupiers to enable the installation of energy efficiency measures and to provide technical support.
- incorporate overheating and condensation mitigation into retrofit programmes
- seek funding for the installation of measures in hard-to-treat properties and deep retrofit projects

Encourage developers to build all new homes to zero carbon standards onsite

Incorporating energy efficiency into new homes will be far more cost effective than retrofitting measures later to meet net zero carbon 2050 targets. Whilst providing residents with an "affordable to run" home from the outset. Consideration should also be given to reducing water consumption to reduce water bills, which is also important for residents already struggling to power their homes.

There are opportunities for these to be addressed through the council housing programme and the enforcement of London and national planning regulations.

To achieve this, we will: -

- agree an energy design standard for all new-build council properties

¹⁴ Annual fuel poverty statistics report 2019 (2017 data) BEIS

¹⁵ A whole house approach considers the house as an energy system with interdependent parts, each of which affects the performance of the entire system. It also takes the occupants, site, and local climate into consideration.

- Continue to use the levers available through the Council's planning, housing and property functions to achieve zero carbon buildings

Reduce the effects of overheating in new building designs and retrofitting programmes

Ignoring overheating risks in new builds and inadvertently introducing them when retrofitting will also cause problems in the future. The number of excessively hot summers are expected to increase with climate change. By the 2040s a summer as hot as 2003, when over 2,000 excess heat-related deaths occurred, is expected to be very common in the UK – potentially every other year¹⁶.

These problems will not only affect residents' health and wellbeing but could involve costly retrofit solutions or increase fuel bills through the requirement of air conditioning units which are energy intensive and expel waste heat externally – making the situation even worse. The average number of heat-related deaths in the UK is expected to more than triple to 7,000 a year by the 2050s.¹⁷ Mitigating overheating will therefore be vital to avoid increased pressure on local health services.

The following household types are at risk¹⁸:-

- Any flat that has large areas of un-shaded glazing facing south, east or west.
- Any naturally ventilated flat where the windows are not opened, either because: They are sealed, they are not fully openable (restricted to prevent falling)
- Any home where security, noise or outdoor pollution concerns prevent occupants from opening windows
- New blocks of flats having a single aspect, leading from a central corridor, and where heating and hot water is distributed around the building.
- Older buildings that have been converted into small flats or houses of multiple occupancy.

Heat risk can be managed by following the cooling techniques:

- reduce the amount of heat entering a building through orientation, shading, insulation and the provision of green roofs / walls
- minimise internal heat generation through energy efficient design
- ventilation (passive; mechanical)

To achieve this, we will: -

- Continue to provide advice on overheating and design mitigation at pre-application stage
- Require thermal modelling for all new major building schemes to demonstrate how overheating risk is minimised through design. Where any future overheating risk is identified a mitigation strategy is in place.
- Ensure that energy efficiency retrofit programmes incorporate adequate ventilation and mitigation measures

Delivery of objective 2 will be resourced by: -

- External Funding – from Government, ECO and/or national charities such as the NEA
- Capital Projects
- Carbon Offsetting funds secured by planning

¹⁶ [Christidis et al 2014](#)

¹⁷ [\(The Environmental Audit Committee 'Heatwaves: adapting to climate change' 2018.\)](#)

¹⁸ [Good Homes Alliance – Preventing Overheating 2014](#)

OBJECTIVE 3 MAXIMISE THE FUNDING AND RESOURCES SECURED WITHIN HARINGEY TO ALLEVIATE FUEL POVERTY

TARGET: **Funding secured to meet the national standard ensuring as many fuel poor homes as is reasonably practicable achieve a minimum energy efficiency rating of Band D by 2025.**

Nationally there is a significant funding gap for energy efficiency measures in fuel poor homes. The Committee on Fuel Poverty estimated in 2018 that there are funding gaps of £2.4 billion to achieve the 2025 target. Haringey will, therefore, need to ensure it is sufficiently prepared to secure funding opportunities as they arise. To do this the strategy suggests creating a pipeline of ready to go projects, with identified delivery/research/financial partners.

Our priorities are to: -

- Pre-empt funding opportunities by identifying key projects and developing appropriate partnerships for delivery
- Allocate some of Haringey's Carbon Offsetting Fund to fund retrofit schemes
- Consider collaborative projects with local health service providers
- Ensure Haringey residents receive a fair share of the Energy Company Obligations (ECO3)
- Investigate funding mechanisms such as a borough-wide revolving energy fund or equity release schemes
- Explore setting up a local or regional energy savings company

Pre-empt funding opportunities by identifying key projects and developing appropriate partnerships for delivery

Chasing every funding opportunity would be resource intensive and could possibly result in missing those which would make the most meaningful impact on the levels of fuel poverty in the borough. By creating partnerships, reviewing the housing stock and co-ordinating activities a more strategic approach can be taken.

To achieve this, we will: -

- Use existing available data to assess current housing stock and identify struggling households. This will ensure the right funding opportunities are sought and limited resources targeted at achieving the most effective outcomes.
- Set evaluation criteria for future projects to create an evidence base
- Partner with other London boroughs. A consortium approach may create more interest and impact to secure funding.

Allocate some of Haringey's Carbon Offsetting Fund to fund retrofit schemes.

The council's planning policies require certain energy standards to be achieved in new-build properties. This can be achieved in several ways, for example by maximising the energy efficiency of the building fabric or installing renewable energy technologies such as solar panels. However, where it is demonstrated it is not possible to meet the standards on-site a developer can pay a carbon offsetting contribution. This money can then be spent on energy efficiency projects around the borough. Allocating some of the funds to matchfund projects, develop a social prescription scheme or top-up ECO funding could accelerate the impact of Haringey's fuel poverty interventions.

To achieve this we will:-

- Identify and test the impact of energy efficiency installations to set criteria for carbon offsetting fuel poverty contributions.

Consider collaborative projects with local health service providers

The effects of a cold home and excessive heat on people's health has already been referred to. This in turn can lead to demands on health services (see fig 6). Working on projects together could help alleviate fuel poverty and provide evidence that energy efficiency schemes can reduce the burden on health services leading to the provision of more funding. It will also ensure that we reach those residents with existing health conditions.

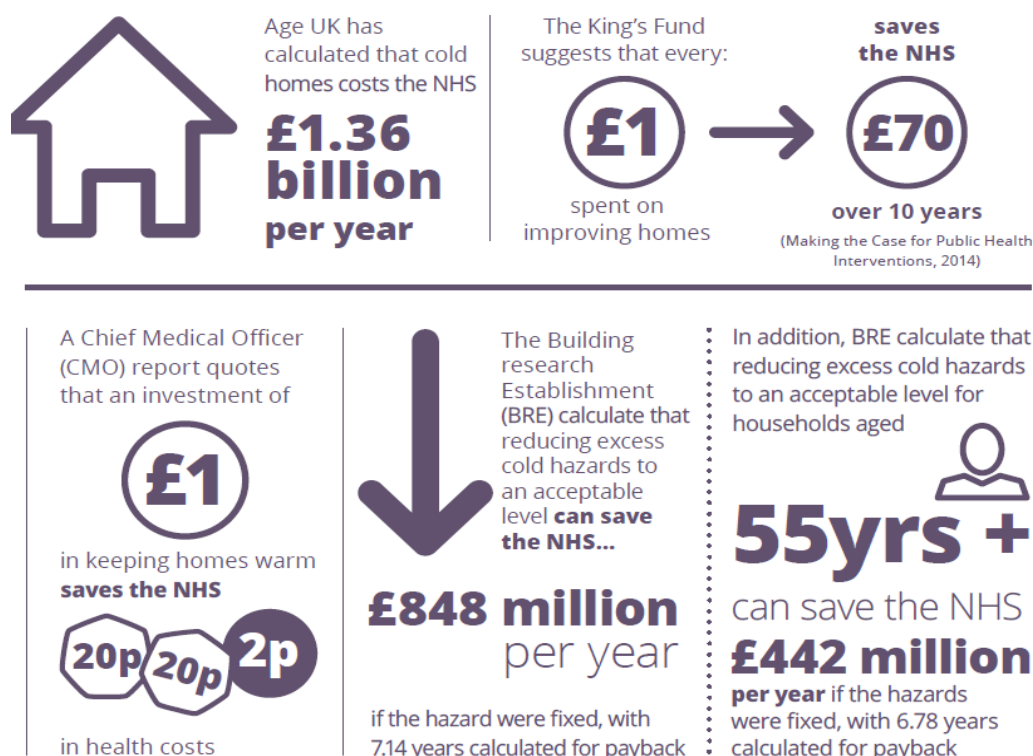


Fig 6. An infographic highlighting the savings that could be achieved by the NHS with good insulation standards.

To achieve this, we will: -

- Evaluate future schemes to produce an evidence base to prove the effect of energy efficiency interventions on reducing health issues and related healthcare costs
- Undertake a case study to inform an approach to social prescribing

Ensure Haringey residents receive a fair share of the Energy Company Obligations (ECO3)

ECO is one of the main sources of funding for fuel poverty energy efficiency installations. The current scheme ECO3 runs until 2022. ECO now includes a "flexibility" element where local authorities can specify eligibility criteria allowing those residents not receiving benefits to receive assistance. Historically, London has not received a fair share of ECO we will endeavour to increase the amount of ECO funding which is spent in Haringey. ECO can finance insulation and energy efficiency measures and BEIS estimate annual fuel bills can be reduced by £150-250 per annum following the installation of ECO funded measures.

This will be achieved by

- Partnering with installers and suppliers with access to ECO funding
- Reviewing our ECO Flexibility criteria to ensure the right people can benefit

Investigate funding mechanisms such as a borough-wide revolving energy fund or equity release schemes

Where grant funding is not available for energy efficiency improvements or matchfunding is required a revolving energy fund or equity release scheme may be able to plug the gap. Equity release schemes allow homeowners to withdraw some of the capital from their home to pay for energy efficiency improvements, repaying the money at the point the home is sold. This could assist asset rich but cash poor households make energy efficiency improvements to their properties. A Revolving energy funds are a source of money from which loans can be made for multiple energy efficiency projects. This source of funding is replenished as individual projects pay back their loans, creating the opportunity to issue other loans to new energy efficiency projects.

This will be achieved by

- Researching similar schemes and engaging with financial service partners.

Explore setting up a local or regional energy savings company (District Energy Networks)

In the Borough Plan, the Council committed to explore setting up a local or regional energy savings company to serve the community and tackle fuel poverty. Current thinking is that this will be a decentralised energy network (DEN) company which will also deliver on the Borough Plan commitment for the Council to lead on setting up an energy network supplying sustainable energy.

The Council is currently exploring setting up neighbourhood DENs focussed around the new developments in North Tottenham, Tottenham Hale and Wood Green (see below for more detail) with a long-term plan to connect to the Energy Recovery Facility in Edmonton and build a network spanning into Hackney. The first phase of the 3 neighbourhood schemes would serve around 2,000 homes in each location. The proposed company's customers will be determined by geographic circumstances rather than by their fuel poverty status. The proposal is to charge customers a fair price of heat (to be no more than it would cost to run a domestic gas boiler, the prevailing heating system in the UK) but to run the company for profit; profits would be ring-fenced for the Council to fund fuel poverty work.

North Tottenham – the Council would set-up a DEN at High Road West (HRW) to serve around 2,500 households in partnership with Lendlease and is in discussion with THFC and other developers in the area to expand the scheme to nearby sites. An Outline Business Case for the DEN was approved by Cabinet in January 2017. However, progress is dependent on the redevelopment of HRW - delivery of the DEN would commence in Phase 1b of the regeneration scheme (estimated at 2024 or later).

Tottenham Hale – the first phase of a council-led DEN in Tottenham Hale would focus on development around Ashley Road and the strategic centre. It could be operational in 2024 to serve around 2,000 homes from an energy centre on Council land at the northern end of Ashley Road.

Wood Green - the first phase of a council-led DEN in Wood Green would focus on development at Clarendon Square, the Chocolate Factory and other nearby sites potentially including a new Council

office on Wood Green High Road. It could be operational in 2024 to serve around 2,000 homes from an energy centre at Clarendon Square which received planning approval in October 2019.

Smaller DENs are also under consideration for the redevelopment of St Ann's hospital and the Council is currently refurbishing and expanding the DEN at Broadwater Farm (this is likely to be retained in the Housing Revenue Account). Works will be complete in early 2020 to allow supply to 850 homes with around 350 more homes expected to be added by 2025 as sites in and around the estate are redeveloped.

Objective 3 will be resourced by: -

- Existing internal staff resources to identify funding resources and writing funding bids

4. Monitoring and review

The Affordable Energy Strategy will be reviewed and progress assessed twice a year. In March and September at the end of each winter and summer period to review project progress and consider ongoing or strategic issues. Progress will be publicly reported as follows: -

- Annually through Carbon Report
- Bi-annually to government through HECA

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EQUALITY IMPACT ASSESSMENT

Name of proposal. Affordable Energy Strategy

Service area. Carbon Management

Officer completing assessment. Gill Cox

Equalities/ HR Advisor. Alisha Muhmood

Cabinet meeting date (if applicable). 12 November 2019

Director/Assistant Director. Dan Hawthorn/Emma Williamson

Summary of the proposal.

This five-year Affordable Energy Strategy (2020-2025) replaces the previous Affordable Warmth Strategy (2009-2019). This is in recognition that fuel poverty or 'energy vulnerability' goes beyond cold homes and related health effects, for example it can exacerbate existing health conditions such as circulatory or respiratory problems (e.g. asthma), diabetes, arthritis, depression and anxiety. The risks are even higher for people with certain disabilities, children and the elderly.

The strategy sets out the vision and action plan for reducing fuel poverty in the borough which has increased to 14.5% in 2018.

The Vision - To reduce the number of households struggling to afford to adequately power their homes and improve the health and wellbeing of residents by:

- Improving the energy efficiency of housing and reducing overheating risks,
- Connecting residents to support services and initiatives to overcome the many causes of energy vulnerability, such as energy prices, low incomes and unemployment.

To deliver this vision, there are three key objectives each with their own action plan:

- Objective 1. Increase the number of struggling households receiving energy advice and expanding the support available to create a people-centred solution
- Objective 2. Improve housing energy performance to reduce fuel poverty, cold homes and overheating
- Objective 3. Maximise the funding and resources secured within Haringey to alleviate energy vulnerability

Key stakeholders engaged as part of the Strategy development:

Internal stakeholders include Housing, Public Health, Carbon Management, and the Private Rented Enforcement team.

External stakeholders include community organisations already working with those on low incomes or long-term health conditions and residents struggling to afford to adequately power their homes.

This was undertaken through the following events as well as public discussions:

- Haringey's new Affordable Energy Strategy is the result of a joint enquiry between researchers from Durham University and Haringey's Carbon Management team.
- Durham has been researching Haringey's approach to fuel poverty since 2015 and have interviewed council staff, partner organisations delivering energy doctor services and community organisation staff to investigate how to find and interact with people most in need of support.
- They listened to members of the local voluntary sector talk about their relations with residents living in energy inefficient homes and studied how these organisations helped people deal with negative impacts on income, health and wellbeing. Households were visited homes to better understand problems faced by residents at risk of spending too great a proportion of income on energy.
- On 22 May 2019 a Fuel poverty community workshop was held with Durham University and SHINE London to discuss the proposed strategy, engagement and support available for residents in the borough. A cross section of community representatives attended including those supporting residents with mental health issues, low income families, carers, learning disabilities and food poverty.

The strategy will be presented to Cabinet in November 2019 for approval to proceed to public consultation.

3. Data

Sex. There is no national or regional data available relating directly to fuel poverty. Haringey borough profile data has been utilised.

Gender Reassignment. There is no national or regional data available relating directly to fuel poverty. Haringey borough profile data has been utilised.

Age. BEIS Fuel poverty statistics
Haringey Borough Profile

Disability. Haringey Borough profile and Institute for Fiscal Studies (2018), 'Living standards, poverty and inequality in the UK: 2018'

Race & Ethnicity. Haringey Borough Profile
BEIS Ethnicity facts and figures Fuel Poverty data

Sexual Orientation. There is no national or regional data available relating directly to fuel poverty. Haringey borough profile data has been utilised.

Religion or Belief (or No Belief) There is no national or regional data available relating directly to fuel poverty. Haringey borough profile data has been utilised.

Pregnancy & Maternity There is no national or regional data available relating directly to fuel poverty. Haringey borough profile data has been utilised.

Marriage and Civil Partnership There is no national or regional data available relating directly to fuel poverty. Haringey borough profile data has been utilised.

Outline of Findings of data analysis.

Summary of Key Findings

In 2017 there were 15,189 households living in fuel poverty in Haringey i.e. 14.5% of the households in the borough. This is the 4th highest percentage in London and substantially above the London average (11.8%).* (BEIS Fuel poverty sub-regional statistics 2017)

At LSOA level, the proportion of households in fuel poverty is highest in the east of the borough particularly Noel Park and Bruce Grove wards. There are no LSOAs in the west of the borough within the top quartile (greater than 16.8%).

Properties at most risk of fuel poverty are those: -*BEIS Fuel poverty sub-regional statistics 2017

- with an energy performance certificate (EPC) rating of E, F or G.
- built pre 1944
- in the private rented sector
- fitted with an electricity pre-payment meter.

Properties at most risk of overheating are: -

- Converted flats or newly built blocks of flats
- Flats facing east/west/south and with a single aspect

In both situations the households most at risk include those with:

- low incomes.
- elderly occupants
- children under the age of 16.
- disabilities or suffering from a long-term illness.
- Those confined to home during long periods of the day

Fuel poverty is measured by the Low-Income High Cost indicator. This ensures that residents qualify for support based on the energy efficiency of their home and their income. Use of property Energy Performance Certificate data will ensure that targeting covers anyone affected by fuel poverty, regardless of tenure, to improve the energy efficiency of their home, reduce the price they pay for energy and to refer them to support services specific to their needs.

The strategy promotes developing a people centred solution to fuel poverty which could reduce inequality and promote fairness in the borough. It sets out to ensure that assistance schemes are communicated to all areas of the community with specific reference to the “hard-to-reach groups”. This may be sections of the population that are not engaged fully in an active participatory citizenship process and fail to access services, either through choice, or the design of the engagement process.

Key Findings

On Sex:

Within Haringey, there is a roughly 50/50 split of males and females. In all age groups up to age 49, males outnumber females, however at aged 50+ this trend is reversed, and

females outnumber males in each bracket. This is particularly evident among those aged 85+, where 62% of residents are female and 38% of residents are male. With a greater number of women in the age 50+ group, and as the elderly are more likely to be affected by fuel poverty, this means women would be disproportionately affected by fuel poverty. The strategy will take this into account i.e. it is likely to have a positive impact on women who are disproportionately affected by fuel poverty. This will be reflected through targeted messaging to this group, and when installing measures for home-owners.

Should uptake data from the Shine and Leap referral services indicates unfair representation our targeting and communication methods will be modified.

On disability:

Research has found that people living with a long-term condition aged 24-54 are 50 per cent more likely to be living in poverty than their able-bodied peers. (Institute for Fiscal Studies (2018), 'Living standards, poverty and inequality in the UK: 2018', p. 59)

- Over 19,500 people aged 16 to 64 in Haringey have a physical disability; this equates to approximately 10% of the population aged 16-64.
- In Haringey 4,500 people have a serious physical disability; 15,700 adults have a moderate or severe hearing impairment; and almost 5,000 people have sight loss which impacts on daily life.
- In Haringey 12% of residents with a long-term health problem or disability that limits their day-to-day activities a lot are in employment, while 32% of those whose day-to-day activities are limited a little are in employment. This compares to 69% of residents whose day-to-day activities are not limited by any long-term illness or disability. 2011 Census ONS

The strategy sets out an ambition to improve the energy efficiency of all fuel poor households. It also aims to ensure all residents have access to cheaper energy tariffs. This will improve the comfort of disabled residents many of whom spend long periods of the day at home whilst reducing energy bills. It also sets out to conduct awareness campaigns with the health sector which should ensure that disabled residents have the opportunity to benefit from any initiatives/grant funding which is made available.

On age:

This strategy makes a commitment to ensure that the referral network reaches all age groups. However, Haringey has a relatively large child population with 20% of the population being under 16 years old. It is acknowledged that living in a fuel poor home can adversely affect a child's academic attainment* Fuel Poverty, National children's bureau. To ensure that families with children under the age of 16 are aware of any fuel poverty initiatives the strategy suggests specific communications with education services.

Over two thirds of the Haringey population are of working age (70.1%). However the strategy acknowledges that those with long term health conditions are adversely affected by living in cold homes and looks to source funding to reduce demands on the health services. In Great Britain in 2011, the proportion of people aged 16-44 reporting a limiting long-term illness was 12%, compared to 47% in those aged 75 and over. Health and Social Care Information Centre (2014) Focus on the health and social care of older people.*Leeds: Health and Social Care Information Centre. As ill health is more prevalent in older age it may appear that the older population are more likely to benefit from fuel poverty

interventions. In addition, the depth of fuel poverty is increases with age. The proportion of households living in fuel poverty is highest where the oldest person in the household is aged 16 to 24. However, the 'depth' of fuel poverty increases with age, with those households where the oldest person is aged 60+ having the largest fuel poverty gap. BEIS 2016 / Annual Fuel Poverty Statistics 2015, DECC.

On Ethnicity:

In 2017, 10.9% of all households in England (2.53 million households) were in fuel poverty. In every year from 2003 to 2017, households in the White ethnic group were less likely to be in fuel poverty than those from the other ethnic groups (made up of all other ethnic groups combined). The strategy will therefore have a positive impact on these non-white groups as these will be the groups that will most benefit from the interventions and measures.

On Sexual Orientation:

3.6% of residents in Haringey identify as Gay, Lesbian, Bisexual or another non-Heterosexual sexuality. Within this group just over half identify as Gay or Lesbian, just over one in four identify as Bisexual, and around one in seven identify as 'Other'. While there is no known correlation between the LGBT community and fuel poverty. The projects that will be delivered as part of the Affordable Warmth Strategy will be installed and delivered with the resident and occupier in mind. All delivery mechanisms and communications lead by the Council and partner organisations, will be designed to ensure that the needs of the LGBT community are reflected. So that delivery agents such as installers reflect the needs and sensitivities of this community.

On Religion and Belief:

Christian residents make up the predominant group in all tenure types and are broadly as likely to social rent as they are to private rent or be owner occupiers. Those of no religion and Jewish residents are more likely to be homeowners. Muslim residents are over-represented in the social rented market (which includes both council housing and housing association stock) and under-represented as homeowners. Alongside this regional and national data suggests that Muslim residents are more likely to have no qualifications and less likely to earn LLW; with Buddhist and Muslim residents most likely to be unemployed. As the Strategy has identified the rented sector of the community the Council will need to target for communications and measures, the strategy will have positive impact on these religious groups.

On Pregnancy & Maternity:

There is no known data on pregnancy and maternity relating to Housing and Place or fuel poverty.

On Gender Reassignment:

There is very little robust data on Haringey or the UK's trans population. However, it is estimated that there are between 200,000 and 500,000 people who identify as trans in the UK. According to the LGBT Survey 2018, younger trans people are more likely to identify as non-binary, with 57% of all trans respondents aged under 35 identifying as non-binary. The age at which transitioning is started tends to be younger, with 81% of people starting transitioning at 34 or younger, compared to 19% transitioning at 35 and over. Of those who identify as trans in the UK the largest group are of White ethnicity, representing 90% of this group. Trans people report lower levels of pay and a lower likelihood of having been in paid

work and these individuals will benefit measures proposed from the strategy. And all communications will ensure that this community is not excluded, and that the Council will work with installers to that the installers understand this groups needs and sensitivities.

On Marital status and Civil Partnership:

- According to the 2011 census, 1,191 residents were in a same-sex civil partnership. ONS Census 2011
- 33.3% of residents aged over 16 are married. ONS Census 2011

The data we hold across the key Borough Plan areas of Housing, People, Place, Economy and Your Council do not indicate any inequalities in the area of Marriage & Civil Partnership. We will continue to fulfil our commitments against this protected characteristic, and if any inequalities in this area emerge we will take the necessary steps to fix them.

Recommendations and Conclusion

The EQIA process did not identify any issues which would have an adverse or differential impact on protected groups. We will continue to monitor for any equalities implications and modify our initiatives to mitigate any issues which arise.

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?

The strategy will go out for public consultation and we will hold drop-in sessions at local libraries across the borough and conduct information sessions for Homes for Haringey residents.

We have also put together a directory of community organisations working within the borough and will offer them the opportunity to comment on the strategy. This includes those working with the elderly, those with long term health conditions and those with children under the age of 16.

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

The consultation will ask questions around the 3 key objectives of the strategy :-

- Objective 1. Increase the number of struggling households receiving energy advice and expanding the support available to create a people-centred solution
- Objective 2. Improve housing energy performance to reduce fuel poverty, cold homes and overheating
- Objective 3 Maximise the funding and resources secured within Haringey to alleviate energy vulnerability

These questions will be designed to ensure:-

- We have understood how residents are experiencing fuel poverty
- Our recommendations will have a positive impact

Where appropriate the strategy will be revised to incorporate comments and suggestions received. This EqlA will also be reviewed as a result of the consultation and updated accordingly. It will then be recommended that the strategy is adopted.

What is the likely impact of the proposal on groups of service users and/or staff that share the protected characteristics?

1. Sex Positive. The eligibility criteria for any fuel poverty initiatives undertaken as a result of this strategy will not be based on gender. Assisting residents of either sex will have the potential to improve the comfort level of their homes and improve their health and wellbeing.

2. Gender reassignment. Positive

There is a commitment to reduce fuel poverty in the borough, especially those from disadvantaged backgrounds and with additional needs. The needs of trans people should be addressed when putting these initiatives into place, while acknowledging that data on this group is often limited.

3. Age Positive

Improving the energy efficiency, reducing damp and mould and improving the comfort of a home will have a positive impact on any household. Young and old people are more affected by living in a cold home so improvements will have a positive impact on these residents.

4. Disability Positive.

Certain impairments and conditions require additional heating, either at higher temperatures, or for longer (or both). There are other factors that may also increase energy needs, for example energy to run nebulisers, stair lifts and hoists, for charging wheelchairs, and having to undertake additional washing and drying. Improving the energy efficiency, reducing damp and mould and improving the comfort of a home will have a positive impact.

5. Race and ethnicity Positive.

The eligibility criteria for any fuel poverty initiatives undertaken as a result of this strategy will not be based on race. However non-white ethnic residents are more likely to be in fuel poverty. Improving the energy efficiency, reducing damp and mould and improving the comfort of a home will have a positive impact on any home affected by fuel poverty.

6. Sexual orientation Positive.

Improving the energy efficiency, reducing damp and mould and improving the comfort of a home will have a positive impact on any home affected by fuel poverty.

7. Religion or belief (or no belief) Positive

Improving the energy efficiency, reducing damp and mould and improving the comfort of a home will have a positive impact on any home affected by fuel poverty. This will be particularly important to the unemployed or on low incomes, the evidence indicates that Muslim and Buddhist households are more likely to be unemployed.

8. Pregnancy and maternity Positive

Improving the energy efficiency, reducing damp and mould and improving the comfort of a home will have a positive impact on any home affected by fuel poverty.

9. Marriage and Civil Partnership Positive

Improving the energy efficiency, reducing damp and mould and improving the comfort of a home will have a positive impact on any home affected by fuel poverty.

10. Groups that cross two or more equality strands e.g. young black women

Improving the energy efficiency, reducing damp and mould and improving the comfort of a home will have a positive impact on any home affected by fuel poverty.

Outline the overall impact of the policy for the Public Sector Equality Duty:

The strategy will not discriminate any particular group. It endeavours to tackle the social determinants of fuel poverty ie Housing (age, location, building type, tenure), income, employment, age and mobility (how often in the home and for how long each day) to reduce inequality and promote fairness in the borough.

What changes if any do you plan to make to your proposal as a result of the Equality Impact Assessment?

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.

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.

Not applicable

Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented:

We will review:-

- Referrals to the energy advice service
- Allocation of grants for energy efficiency measures

To ensure that support is being apportioned across the borough. Where an issue is identified we will review the referral network to ensure the strategy and subsequent initiatives are reaching the whole community.

EqIA approved by Dan Hawthorn

Report for: Cabinet Meeting – 12th November 2019

Title: Council Energy Contracts Award

Report authorised by: Dan Hawthorn, Director of Housing, Regeneration and Planning

Lead Officer: Joe Baker, Head of Carbon Management
x3976, joe.baker@haringey.gov.uk

Ward(s) affected: All

Report for Key/

Non Key Decision: Non-Key Decision under Council Standing Order 9.7.1f.

1. Describe the issue under consideration

- 1.1 The purpose of this report is to seek formal approval for use of the LASER Energy Framework Agreement to administer the purchase and supply of the Council's corporate gas and electricity contracts for the period 1 April 2020 to 31 March 2022 with the option to continue with the purchasing arrangements under a rolling forward buying commitment arrangement until 31 March 2025 (unless terminated by the Council).
- 1.2 The Council's corporate gas and electricity contracts cover the supply of gas and electricity to Council office buildings, community centres, parks and open spaces, street lighting, schools and social housing communal supplies (staircase/corridor lighting and lifts). This comprises in excess of 3,000 individual gas and electricity supply points.
- 1.3 Haringey Council is a member of the London Energy Project (LEP). The LEP is a collaborative Category Management resource funded on a co-operative basis by its 36 participating authorities (primarily in London) and works in collaboration with NHS London Procurement Partnership. The LEP's principal purpose is to use authorities' combined spending power to minimise risk, reduce procurement, contract operation and back-office costs and achieve better commercial outcomes. As a member, Haringey receives specialist utility procurement advice and contract management support from the LEP.
- 1.4 In 2008, the LEP took a lead on centralising London energy spend and formally endorsed the use of two public sector Professional Buying Organisations (PBO) to undertake risk managed aggregated flexible energy procurement on behalf of its members; KCC Laser and Crown Commercial Services (CCS). Haringey has procured its gas and electricity supply requirements through the CCS energy supply framework since 2010, with the current arrangements coming to an end on the 31 March 2020.
- 1.5 The LEP on behalf of the London authorities including Haringey, considered private sector brokers and other public sector buying organisations, during a period of pre-market engagement. LASER was ultimately selected (more details in section 6.8)
- 1.6 Following evaluation LEP's Category Board endorsed LASER as the Central Purchasing Body (CPB) to establish a regional approach to energy procurement for London and the south that maximises LEP members' collective buying power, optimises contract options, develop different price risk products than those currently

available and makes best use of new supply and service options in the market – i.e. to deliver a bespoke energy supply solution for LEP authorities that can go beyond the value-for-money we receive in 'national' contracts with currently endorsed CPB's. It will also enable the Council to purchase 'Green' energy within the current budget, therefore, allowing the Council to start delivery on its Zero Carbon ambition through purchasing electricity from renewable sources at best value to the Council.

1.7 LASER will:

- aggregate LEP customer volumes and flexibly purchase energy requirements under a risk strategy in the complex, fast moving wholesale energy market
- Undertake an OJEU compliant process to appoint the framework energy suppliers who will supply and administer the purchased energy requirements. The framework governs the supplier arrangement and the services delivered.

2. Cabinet Member Introduction

2.1 The Council's energy consumption represents a significant, but necessary cost to the Council.

2.2 Haringey Council is committed to mitigating these costs as much as possible through flexible purchasing solutions, transactional efficiencies and energy conservation measures.

2.3 The strategy set out in this report ensures the Council reduces exposure to peaks in energy prices by spreading our purchasing over several months. In addition, the aggregation of our consumption with other public sector bodies helps reduce costs further, through economies of scale. And finally, this new contract will enable the Council to purchase green energy for a competitive price and give access to an energy efficiency advice service for all users to reduce carbon and costs.

3. Recommendations

- a) To approve the use of the LASER Energy Framework Agreement to administer the purchase and supply of the Council's corporate gas and electricity contracts for the period 1 April 2020 to 31 March 2022 (at an annual cost of £7.2m per annum) with the option to continue under a rolling forward buying arrangement up to 31 March 2025 (unless terminated by the Council) at an estimated total value of £36m.
- b) To approve the use of LASER's appointed energy framework suppliers for the supply of gas and electricity through the framework duration. The breakdown of contract spend between the appointed suppliers is estimated at; Npower (LASER Framework Y18003 - corporate electricity supplies, HRA and street lighting) at £5.2m per annum (up to £26m over 5 years), and Corona Energy (LASER Framework Y18002 - corporate gas supplies) at £2.02m per annum (up to £10m over 5 years); and to authorise the Director of Housing, Regeneration, & Planning to award the contracts and facilitate the execution, implementation and operation of the contract, including the use of ancillary services available under the contract
- c) To authorise the Director of Housing, Regeneration, & Planning to manage the Council's energy purchasing strategy through price and risk. Reviewing options for alternative price risk management strategies for the supply of energy during this supply period in order to minimise risk and market volatility and obtain best value. This will be undertaken through advice of the LEP, LASER and energy suppliers.

- d) To approve the use of a REGO backed 'green' tariff for Corporate Estate (Schools, Civic Buildings, Street Lighting etc), as part of the Council's commitment to carbon reduction. This will cost approximately £17k per year on top of the £5.2m electricity contract. This cost will be shared among all services who pay for electricity (Schools, Council Buildings.) The green tariff will not cover Homes for Haringey as this would require tenants voting on this policy and its implications.

4. Reasons for decision

- 4.1 Following a previous failed procurement the LEP accessed an existing LASER National framework which had been awarded in December 2018.
- Y18002 – Flexible Procurement and Supply of Daily and Non-Daily Metered Natural Gas
 - Y18003 – Flexible Procurement and Supply of Half Hourly and Non-Half Hourly Metered and Unmetered Electricity
- 4.2 The LEP specification for transactional efficiency, online portal, budget tools, customer service and wider strategic objectives including social value and green energy were embedded as an enhanced Service Level Agreement with the suppliers for LEP members. The social benefit is secured by requiring suppliers to ensure the London Living Wage is delivered through direct employees and being worked towards through their contractors. The suppliers are also required to recognise unions and the right for workers to join them. To demonstrate the green energy supply suppliers are required to produce REGO backed certificates that demonstrate a green energy supply chain has been followed.
- 4.3 The contract to supply Electricity (Half Hourly – covering large electricity sites, Non-Half Hourly – covering small electricity sites, unmetered supplies and streetlighting) was awarded directly to the Framework supplier following formal evaluation to ensure the enhanced SLA for LEP members could be fully delivered.
- 4.4 A mini-competition was undertaken between the Framework gas suppliers that assessed the supplier's capability and price to deliver the enhanced pan-LEP SLA. Corona Energy was evaluated to be the most economically advantageous provider following this process. Full details of the evaluation is detailed in the Part II.
- 4.5 In utilising the proposed pan-LEP arrangements, the Council will be able access best practice energy contract arrangements as endorsed by the LEP. Implementing the new arrangements from the 1 April 2020 to:

Address the Council's target to become carbon neutral by 2030 through:

- securing arrangements for the supply of 100% Renewable Energy Guarantee Origin (REGO) sourced energy
- deliver arrangements which facilitate on-site energy generation, demand side response, community engagement, development of district heat networks and Power Purchase Initiatives
- implement energy supply contracts that provide a one-stop route for energy efficiency, financing innovation and carbon reduction measures

Build on Value for Money and efficiencies already achieved in working in collaboration with the London Energy Project (LEP)

- achieve better budget, price and risk management through the continued aggregation of the Council's energy supplies with the rest of the public sector portfolio managed by Central Purchasing Bodies

- adapt to the changing energy supply market, the changing makes up of energy cost and move away from a transactional relationship with the appointed energy suppliers
- implement arrangements where the supplier is required to facilitate better energy consumption data analysis to support energy efficiency measures, improved billing quality and increase efficiency of back office processes

Ensure that the Council's Fairness and Responsible Procurement ambitions are realised.

- The Living-Wage will be applicable for directly employed and sub-contracted staff with respect to the proposed contracts.
- The providers are signatories of the Modern Slavery Act (2015) incorporating a whistleblowing policy and enabling the freedom of employees to join a trade union and not be treated unfairly because of belonging to one.
- Both providers have committed to the provision of Quality Apprenticeships under the contractual arrangements
- Both Providers have more than 250 staff and are signatories of the London Healthy Workplace Charter
- The necessity for rolling arrangements are to allow effective risk management and to accommodate decision making processes and timescales for Cabinet on extensions and terminations. Haringey Council would typically need to serve termination notice by March at least one or two years in advance of the supply period, e.g. in March 2020 to prevent a contract being delivered in April 2022. For effective management, our recommendation is that call-off contracts can roll forward with a final supply date of 31st March 2025, unless terminated by the Council, which is allowed as per recommendation number 3b).
- If the termination notice is not given the arrangement rolls forward automatically. The contracts allow us to reduce or increase our overall volume requirement each year prior to supply delivery without attracting a financial penalty. During each forward buying commitment period and contract delivery period the Council may remove Sites from the Site Schedule in the event that such Site has been sold or closed, without attracting a take or pay penalty and may add new sites to the contract under the same terms and conditions and non-energy pricing offered by the framework.

5. Alternative options considered

5.1 Spot Buy (Fixed Price Contracts)

This is where the Council would buy short-term contracts for a fixed price over the time period. Although there are savings that could be made, the council would be more exposed to the vagaries of the wholesale market (a price is fixed on a single day in the year) and could pay higher off-contract prices until an appropriate new contract is in place. It is also not compliant with either Procurement Standing Orders (PSOs) or public procurement legislation. This was ruled out due to the risk of price volatility, lack of in-house expertise and the fact that this does not comply with Council Standing Orders.

5.2 Procure our own energy by direct tender

This option is possible, but it would involve a standalone OJEU (Official Journal of the European Union) tender to secure contracts directly with the selected energy provider(s) (or via a broker see option 5.3). This approach is unlikely to produce the best results due to the relatively small scale of the portfolio compared that of most

large purchasing organisations. In contrast, a Public Sector Buying Organisation can obtain good wholesale prices through aggregating the demand of a large number of public sector organisations. In addition, a direct tender would require the Council to engage additional resources (skilled energy traders and additional staff for contract management) and provide greater risk of exposure to energy price fluctuations. It was therefore determined as unviable.

5.3 **Procure through a Private Sector based provider**

The Council would require a tender for a private sector Third Party Intermediary (TPI) to procure energy supply (as Option 2), but it would need to be sure that it would be getting best value through a truly aggregated, flexible contract. Full price transparency of all costs, including TPI fees and any commission paid by suppliers to the TPI would be needed. By aggregating the Council's volumes, the TPI could access the wholesale market on our behalf but we may only receive prices based on the supplier's view of the market. A full OJEU tender process would be required to engage with such a provider with all the associated resource and time implications that would be entailed. TPIs may have issues regarding business continuity in the present economic climate are unlikely to be able to aggregate the council's volume with other customers in an OJEU compliant manner or to the same level or offer the same additional and social value as the Pan-LEP contracts. Due to this level of complexity and lack of in-house resources to deliver this, this option was dismissed.

5.4 **Procure from generators**

The council could purchase electricity via an OJEU procedure from nominated generators. Power Purchase Agreements (PPAs) typically facilitate the sale of energy from the operators of small scale off site renewable generation assets including Combined Heat and Power (CHP) plant, wind turbines, solar PVs and anaerobic digestion. It is unlikely that the Council could rely solely on such a source, due to security of supply issues, but could combine such energy with that provided from a conventional supplier. As a customer, this could help increase the Council's environmental credentials through being seen to invest in generation from low carbon and renewable sources. Depending on the type of PPA, it could also reduce the impact of power/price volatility on the organisations as it is possible to fix prices on a long-term basis (typically up to 5 years ahead).

These are usually more attractive if the electricity can be supplied from the generator directly to the user without involving the national grid (i.e. over 'private wires') as this reduces the amount of transmission and distribution charges payable, but a conventional licensed supplier would need to be involved to ensure there is an adequate and consistent source of supply of electricity. It would also remain necessary to make suitable arrangements for the purchase of gas and oil. This type of PPA 'sleeving', will be possible through the Pan-LEP arrangement.

This option was not taken forward due to the complexity, lack of market interest for the Council (we are not a large energy purchaser in the national scale), and as similar environmental outcomes can be delivered through the Pan-LEP agreements.

5.5 **Generate the Council's own energy**

The council could invest in electricity generating assets and use the output to contribute towards the supply of electricity to council owned or operated buildings. Such as Combined heat and Power, or renewable technologies. A licensed supplier would still need to be involved to facilitate this and to ensure that the councils still received an adequate supply of electricity. This option is available within the Pan-LEP contract and was included with the OJEU process to ensure compliance with procurement regulations. And will be delivered as the Council starts to deliver the

Decentralised Energy Network (DEN) projects. But due to the high level of investment and timescales this was not taken forward.

5.6 **Procure via Central Purchasing Bodies (CPB)**

The Public Contracts Regulations 2015 define a Central Purchasing Body (CPB) as 'a contracting authority which provides centralised purchasing activities and which may also provide ancillary purchasing activities'. CPBs often set up and operate framework agreements which are accessible to contracting authorities such as the council.

There are a number of advantages to using a CPB, including better prices through economies of scale, lower transaction costs, improved capacity and expertise. A key role of most CPBs is the conclusion of framework agreements or other consolidated procurement tools. Framework agreements seek to achieve efficiency gains and greater value for money in the public procurement process using the aggregated purchasing power and expertise of CPBs that creates economies of scale in both supply and demand.

5.7 **Do nothing**

This is not an option as the Council and users of its buildings rely on energy to operate. It would place a requirement on schools and Homes for Haringey to procure their own energy supplier or run out of contract which is a cost with a premium.

6. **Background information**

- 6.1 The Council currently procures its energy supply from CCS via the LEP and this arrangement is due to come to an end on 31 March 2020. The Council's corporate gas and electricity contracts cover the supply of gas and electricity to Council office buildings, community centres, parks and open spaces, street lighting, schools and social housing communal supplies (staircase/corridor lighting and lifts). Haringey has in excess of 3,000 individual gas and electricity supply points. It is vital that the Council has energy suppliers (electricity and gas) in place, to ensure prices for budget monitoring, and contractual standards (such as billing and metering) are in place.
- 6.2 The Council is a member of the London Energy Project (LEP) which is funded on a cooperative basis by its 36 participating authorities. The LEP's principle purpose is to use authorities' combined spending power to minimise risk, reduce procurement, contract operation and back-office costs and achieve better commercial outcomes.
- 6.3 In aggregating its energy supplies with a Professional Buying Organisation (PBO) the Council benefits not only from the size of its estate but that of other public bodies. The PBO (and not the energy suppliers) purchases the energy on behalf of the Council direct from the wholesale energy market accessing reduced traded prices. This is currently done over a six-month procurement window, to enable our energy to be purchased in a regulated risk managed manner, providing protection from price peaks, smoothing out energy prices through a series of purchases over the procurement window.
- 6.4 The energy purchased by the PBO is supplied by their appointed framework energy suppliers, who are appointed following a competitive process in compliance with EU legislation, based on their cost to serve and administer the supply of the energy.
- 6.5 The average energy price achieved by the PBO over the set purchase window is combined with the energy suppliers agreed cost to serve and pass through industry charges to determine the fixed rate for each Council site for a 12-month period. This process is then repeated to renew prices each year. The process ensures that the Council's energy requirements are purchased in a risk managed manner, ensuring

value for money and enables our account to be managed strategically in collaboration with the LEP and participating members.

- 6.6 Whilst the current LEP endorsed arrangements (of which Haringey currently utilises CCS) generally deliver value for money, it has been recognised they reflect out of date assumptions about customer expectations for value-for-money, environmental and social value, and have service delivery methods that do not match LEP authorities' need for back-office and resource efficiency. The current models focus on establishing 'national' contracts that have benefits of large aggregation and low supplier cost to serve margins, but disadvantages of treating customers as if they have the same requirements.
- 6.7 Collectively the aggregation of energy supply contracts amongst LEP members is worth approximately £450-£500 million per year and the LEP has recognised that the combined spend can be leveraged further to achieve wider social & financial benefits.
- 6.8 The LEP on behalf of the London authorities including Haringey, reviewed its future energy procurement strategy. And as part of this considered private sector brokers and other public sector buying organisations, during a period of pre-market engagement. The LEP's Category Board endorsed LASER as the Central Purchasing Body (CPB) to establish a regional approach to energy procurement for London. LASER was selected on the following basis:
- capability, capacity and experience to deliver the tender and subsequent framework, contract, buying and risk management service.
 - It was not a competitive procurement process because LASER is a Centralised Purchasing Body (CPB) as defined in procurement regulations; and contracts for centralised purchasing services can be awarded directly to a CPB (where appropriate). The contract can include 'ancillary purchasing services' (covering technical infrastructure, procurement advice, management of procurement projects etc.) meaning that a full managed service can be provided, such as buying and risk management, or bill validation and payment
 - Another CPB company "The Energy Consortium" (TEC) withdrew from the process, as they could not deliver the volume of services.
 - CCS submitted a proposal, which was initially accepted, however, the appointment process was abandoned, as CCS was unable to deliver the stated goals within the timeframes required.
- 6.9 Following evaluation LEP's Category Board endorsed LASER as the Central Purchasing Body (CPB) to establish a regional approach to energy procurement for London and the south that maximises LEP members' collective buying power, optimises contract options, develop different price risk products than those currently available and makes best use of new supply and service options in the market – i.e. to deliver a bespoke energy supply solution for LEP authorities that can go beyond the value-for-money we receive in 'national' contracts with currently endorsed CPB's. It will also enable the Council to purchase 'Green' energy within the current budget, therefore, allowing the Council to start delivery on its Zero Carbon ambition through purchasing electricity from renewable sources.
- 6.10 LASER on behalf of the local authorities will:
- aggregate LEP customer volumes and flexibly purchase energy requirements under a risk strategy in the complex, fast moving wholesale energy market
 - Undertake an OJEU compliant process to appoint the framework energy suppliers who will supply and administer the purchased energy requirements. The framework governs the supplier arrangement and the services delivered.

7. Contribution to strategic outcomes

7.1 In agreeing this report, The Council will be:

- Addressing the Council's target to become carbon neutral, as the Council will move to a 'green' energy supplier (Place: Outcome 9 – a healthier, active and greener place)
- Build on Value for Money and efficiencies already achieved in working in collaboration with the London Energy Project (LEP) (Your Council: Outcome 20 - We will be a council that uses its resources in a sustainable way)
- Ensure that the Council's Fairness and Responsible Procurement ambitions are realised (Economy: Outcome 15: A borough with more quality jobs with opportunities for progression).

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

8.1 Finance

8.1.1 The council's `energy spend for 2018/19 is set out below:

- EDF Energy (large consuming electricity sites) total contract across the Council and partners spend is £3.83m. Of which £69k is paid corporately.
- British Gas Business (smaller consuming electricity sites) total contract across the Council and partners spend is £1.41m of which £948k is paid corporately.
- Corona Energy (corporate gas supply) Total Contract across the Council and partners spend is £2.03m of which £164k is paid corporately.
- This gives the total spend for energy at £7.27m. across the full portfolio (schools, Corporate estate, Street lighting, Homes for Haringey etc) with the corporate total being £1.181m.

8.1.2 The cost for moving the Corporate Estate (Schools, Civic Buildings, Street Lighting etc) to a 'green' tariff would cost approximately £17k pa on a £5.2m electricity contract. The green tariff is increasingly being asked for by schools and community users in our buildings. The additional costs will be split between corporate buildings and schools users based on consumption. The cost of green tariff will be mainly met out of Schools budgets and Community buildings.

8.1.3 In utilising the proposed pan-LEP arrangements, the Council will be able access best practice energy contract arrangements as endorsed by the LEP.

8.1.4 The approval of the recommendation in this report should minimise the Council's exposure to volatility in the energy market and help to control costs over the lifetime of the contracts.
There is currently an assumption built in the formulation of the new draft Budget and MTFS based on Laser projections to cover the increase in energy prices and this will need to be reviewed once the contracts have been agreed.

8.2 Procurement

Strategic Procurement are in agreement with this award that is compliant with the contract standing orders and 2015 Procurement Contract Regulations.

8.3 Legal

- 8.3.1 The Assistant Director of Corporate Governance notes the contents of the report.
- 8.3.2 The LASER Energy Framework Agreement which this report relates was established in accordance with the provisions of Regulation 33 of the Public Contracts Regulations 2015.
- 8.3.3 Pursuant to CSO 7.01(b) and pursuant to Regulation 33 of the Public Contracts Regulations 2015, the Council may select one or more Contractors from a Framework established by a public body where the Council has been identified in the OJEU Contract Notice as an approved user.
- 8.3.4 It is confirmed that the Council is identified as an approved user of this LASER Energy Framework Agreement in the OJEU Contract Notice and therefore Cabinet is in a position to approve the use of the Framework Agreement to administer the purchase and supply of the Council's corporate gas and electricity contracts.
- 8.3.5 Pursuant to CSO 9.07.1(d), Cabinet may approve the entering into a contract if the value of the contract is £500,000 or more and as such Cabinet has power to approve the recommendation in this Report.
- 8.3.6 The Assistant Director of Corporate Governance sees no legal reasons preventing the approval of the recommendations in the report.

8.4 Equalities

- 8.4.1 The Council has a public sector equality duty under the Equalities Act (2010) to have due regard 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 apply to the following protected characteristics: age, disability, gender reassignment, pregnancy/maternity, race, religion/faith, sex and sexual orientation. Marriage and civil partnership status apply to the first part of the duty.
- 8.4.3 The Council's Equal Opportunities Policy (2012) details how equality considerations are factored into the procurement process. The tendering process required the contractors to demonstrate their compliance with the Equality Act (2010). It is therefore not anticipated that the award of the contract will negatively impact on any protected characteristic groups.
- 8.4.4 This procurement strategy delivered here minimises the risk of exposure to peaks in the Energy Market. And the performance analysis suggests that achieved prices will be below the market average. This will protect against possible price increases and minimise the cost of utilities for Council, schools and community building operations. This in turn minimises increases in budgetary pressures and contributes to the protection of service delivery, for the Council, schools and community building occupiers on the Councils Energy Contracts.

- 8.4.5 With respect to schools, protection of service delivery can be expected to have a positive impact on children, a majority of whom in Haringey are from BAME communities. With respect to community buildings, this can be expected to have a positive impact on individuals and groups who share protected characteristics including race/ethnicity, religion/faith, age, and sex owing to the profile of the organisations that are tenants of community buildings in Haringey and the stated objectives of those organisations.

9. Use of Appendices
None

10. Local Government (Access to Information) Act 1985

This report contains exempt and non-exempt information. The exempt information is not publication as it contains information classified as exempt under the following categories (identified in the amended Schedule 12A of the Local Government Act 1972):

- (3) Information relating to the financial or business affairs of any particular person (including the authority holding that information).

Report for: Cabinet – 12th November 2019

Title: Improving High-Speed Broadband Infrastructure and Connectivity in Haringey

Report Authorised by Dan Hawthorn, Director of Housing, Regeneration & Planning

Lead Officer: Peter O'Brien, AD Regeneration & Economic Development

Ward(s) affected: All

Report for Key/Non-Key Decision: Key

1. Describe the issue under consideration

- 1.1 This report seeks approval to invite Expressions of Interest from broadband suppliers to install the latest full fibre high-speed broadband infrastructure and connections to council-owned housing stock, commercial properties, libraries, and other community buildings and facilities - in exchange for the council entering into a Non-Exclusive Wayleave (Access permission) Agreement ("Wayleave / Broadband Agreement") with the selected broadband supplier(s).
- 1.2 The broadband supplier(s) broadband upgrade will be at no cost to the council, social housing tenants/leaseholders or businesses/organisations occupying LBH-owned commercial premises. The tenants will pay broadband subscription fees only if they sign-up to the service of the broadband supplier(s) that provides the fibre broadband installations.
- 1.3 The proposed Wayleave/Broadband arrangement is designed to incentivise major broadband suppliers to improve the poor internet connectivity in many parts of the borough, by upgrading the borough's digital infrastructure.
- 1.4 In addition, the report updates Cabinet on the delivery plans for the £800,000 Haringey Council has secured from, the Strategic Investment Pot (SIP), a scheme funded through the London Business Rates Pool, to deliver full-fibre broadband infrastructure and connectivity in Northumberland Park/North Tottenham – the most economically deprived part of the borough and the area with the worst internet connectivity. As noted in the Finance comments, a capital budget allocation has been made for the SIP funded broadband project.

2. Cabinet Member introduction

- 2.1 High-speed internet connections are essential for Haringey's residents and businesses. They act as the fuel for our modern economy and without it residents and businesses face real risks of being digitally excluded from modern life.

- 2.2 However, our evidence suggests that Haringey lacks the modern high-speed broadband infrastructure and connectivity to be able to take advantage of many of the benefits and opportunities highlighted above.
- 2.3 The proposals and projects represent tangible initiatives to help improve high-speed broadband infrastructure and connectivity in the borough – and thereby maximise the advantages and potential associated with high-speed connectivity for the benefits of its residents, businesses and community.

3. Recommendations

Cabinet agrees:

- 3.1 the seeking of Expressions of Interest from broadband suppliers to install full fibre high-speed broadband infrastructure and connections to council-owned social housing stock, commercial properties and community buildings and facilities (at no cost to the council, residents or businesses), in exchange for the council entering into a Non-Exclusive Wayleave (Access permission) Agreement with the selected broadband supplier(s).
- 3.2 to give delegated authority to the Director of Housing, Regeneration and Planning, after consultation with the Cabinet Members for Local Investment, Economic Growth, Finance and Strategic Regeneration and Housing and Estate Renewal, to enter into the Wayleave Agreement(s) with the appointed broadband supplier(s) and approve the final terms.
- 3.3 In addition, Cabinet is asked to note the delivery plans for the £800,000 SIP funding to improve broadband infrastructure and connectivity in North Tottenham (Northumberland Park).

4. Reasons for decision

- 4.1 Investment in upgrading Haringey's digital infrastructure is of critical importance to allow the borough's residents and businesses benefit fully from the economic and social advantages provided by high-speed internet connectivity.
- 4.2 The proposed Wayleave/Broadband approach is one way the council can actively incentivise broadband suppliers to provide the much-needed capital investment into broadband connectivity within its estate.
- 4.3 It is hoped the Wayleave/Broadband scheme could result in the following benefits for the council, residents, businesses and the wider economy:
 - 21,000 council social housing properties being connected with full fibre high-speed internet connections
 - Council-owned commercial property being connected with full fibre business-grade high-speed broadband connections. This could lead to increased rental income for the council
 - Free high-speed internet connections to community buildings and spaces including libraries, community halls, youth clubs etc

- Low internet subscription charges for people on low incomes and the socially excluded
- Employment, digital training and apprenticeship opportunities for local people
- Regeneration, business and wider benefits for the local economy
- Efficiency and savings for the council, particularly on “Access to online services” and “Housing blocks and other building management services”.

Additional information on the benefits of the Wayleave/Broadband scheme for the council, residents, businesses and the wider economy, is outlined in Appendix 1

5. Alternative options considered

Option 1: ‘Do Nothing’

- 5.1 An option would be for the Council not to seek Expressions of Interest for broadband suppliers to upgrade the borough’s digital infrastructure through the Wayleave/broadband investment arrangement.
- 5.2 This would result in the council not being able to secure external investment to improve its digital infrastructure and connectivity. There is very little public funding currently available to target upgrades to digital infrastructure.

Option 2:

- 5.3 The recommended option is to invite Expressions of Interests from broadband suppliers and for the council to enter into a Non-Exclusive Wayleave Agreement with the appointed broadband supplier(s) – for them to install full fibre high-speed infrastructure and connectivity to council-owned social housing stock, commercial properties and community buildings and facilities at no cost the council. Enabling private sector capital investment, through the Wayleave/Broadband arrangement, is the most viable and cost-effective option – to modernise the borough’s digital infrastructure and connectivity.

6 Background Information

- 6.1 It is well documented¹ that high-speed broadband (internet) has become a fundamental digital infrastructure for businesses and residents alike. The Council is acutely aware that access to quality digital infrastructure is necessary to support a modern economy and that connectivity must therefore be at the heart of the Council’s Community Wealth Building agenda.
- 6.2 It is also clear that a lack of digital connectivity can result in individuals, household and businesses being digitally excluded, and so the council views the provision of such infrastructure as an important part of creating an inclusive economy.

¹ Oxera (Sept 2019): Impact at a local level of full-fibre and 5 G investments; Tech City UK 2018: Tech Nation report 2018; GLA/LEP 2014, ESIF Strategy for London; DCMS: UK Digital Strategies (2017, 2016 and 2015); Regeneris (2012): Superfast broadband; impact on business and the UK economy; GLA (2012): London Super Connected Cities;

- 6.3 The UK Government has set a target that half of UK Homes should have a full fibre-optic broadband connection by 2025 and all properties should be connected by 2033². To facilitate the installation of full fibre infrastructure and connection across the UK, the Government introduced new obligations on land/property owners to grant permission to broadband suppliers to install their cables onto properties. These have been summarised by the industry regulator OFCOM³.
- 6.4 Research commissioned by the council found that many areas of the borough have poor high-speed broadband infrastructure and internet connectivity problems. These problems are particularly acute in Tottenham and Wood Green industrial estates and housing blocks and estates.
- 6.5 Despite the current and future importance of full fibre broadband infrastructure and connectivity, currently only 2.7% of the borough has full fibre broadband connections. (Haringey is ranked 23rd for full fibre connection out of the 33 London boroughs). The only areas of the borough with full fibre broadband infrastructure are parts of Tottenham Hale (near the Station); parts of White Hart Lane (near the Tottenham Hotspur stadium); St Ann's Hospital and a few areas in Highgate and Hornsey.
- 6.6 Evidence suggests that the poor connectivity is mainly due to lack of upgrade in the borough's digital infrastructure (especially full fibre broadband) by the major broadband suppliers – because of the high cost and return on investment concerns in investing in areas like Tottenham and Wood Green.
- 6.7 Moreover, it was found that the borough as a whole, is lacking in full fibre-optic broadband infrastructure. Full fibre broadband is the latest, fastest and future-proof (has a life span of over 20 years) broadband technology. Fibre broadband replaces the 100-year-old telecom technology of copper wiring which has been an essential part of most of the current broadband/internet infrastructure and connections. Full fibre offers the fastest internet speeds and the most reliable internet connection (i.e. does not crash or buffer). It provides download and upload speeds of more than 20 times (1000 Mbps/ 1 Gbps) the current copper-based broadband technology.
- 6.8 Full fibre is also the essential backbone for all the new and emerging technologies – including 5G, the next generation of high-speed mobile technology network. 5G will be the backbone of all new and emerging technologies and industries such as: Artificial Intelligence, Augmented Reality, Mobile Virtual Reality, Internet of Things (IOT), Smarter Cities, Driverless cars etc
- 6.9 Full fibre broadband infrastructure and connections will also be essential for the effective management of the council and other social housing properties, (including sheltered housing, residential blocks and community facilities). This is because it provides the digital platform upon which “Smart Building” technologies and services can be delivered. These smart systems can significantly increase the efficiency and reduce the costs associated with managing the property stock

² <https://www.computerweekly.com/news/252441741/Government-pledges-full-fibre-broadband-for-all-by-2033>

³ https://www.ofcom.org.uk/__data/assets/pdf_file/0025/108790/ECC-Code-of-Practice.pdf

and improve services to residents. Full fibre broadband also provides the backbone for the current (and future) technologies that powers new services for independent living for people with disabilities, older people or people with special needs.

6.10 There are two planks to the council's current work to improve high-speed broadband connectivity in the borough, namely:

- (i) Development work to secure private sector investment from major broadband suppliers for broadband upgrade in the borough - through Non-Exclusive Access Wayleaves
- (ii) delivering full-fibre broadband infrastructure and connectivity in Northumberland Park/North Tottenham – the most economically deprived part of the borough and the area with the worst internet connectivity

(i) Wayleave/broadband Agreements

6.11 Wayleave/Broadband Agreements involve the council giving a few broadband infrastructure providers (normally up to a maximum of three) access rights to Council owned (and long-term leasehold) property assets, to install and maintain a full fibre network in the common areas of the buildings.

6.12 The installation comes at no cost to the council or residents or businesses, with residents/businesses only paying if they decide to sign up/subscribe to the broadband supplier(s) chosen by the council to provide the broadband connection to the block/estate/commercial building. This is because the chosen broadband suppliers' connections would allow tenants or businesses to subscribe to any broadband supplier/network of their choice (including major suppliers such as BT, Virgin, Vodaphone etc).

6.13 To ensure that the subscription charges are affordable, the broadband suppliers chosen to partner with the Council, would provide different service packages based on internet speed. Therefore, residents and businesses would be able choose cheaper packages at a cost of £20 per month. Some suppliers can provide even cheaper subscription charges to customers who the Council identifies as being in particular need. In such cases, internet subscription charges could be as low as £10 per month.

6.14 A number of London Local Authorities have taken advantage of Wayleave/Broadband arrangements. Southwark, Wandsworth, Richmond, Brent, Bexley, City of London, Westminster, Tower Hamlets, Hammersmith & Fulham have entered into such Wayleave Agreements with broadband suppliers, which has led to significant economic and social benefits for the boroughs and their residents. For example:

- Wandsworth Council has a Wayleave Agreement with an established broadband supplier for the company to provide very fast high-speed infrastructure and connectivity to 30,000 Council managed properties. The Agreement includes free broadband to community halls and sheltered housing club rooms

- Croydon has a Wayleave Agreement with a broadband supplier to provide full-fibre broadband to 11,000 council properties across the borough
- City of London has a Wayleave Agreement with 3 broadband suppliers to connect 12 housing estates and a number of community facilities

- 6.15 Haringey Council has received initial informal proposals from a number of broadband suppliers to invest in full fibre high-speed broadband infrastructure in the borough's social housing, business locations and community buildings.
- 6.16 The proposals to upgrade broadband connectivity in council social stock through the Wayleave arrangements complements Homes for Haringey's Transformation Programme where priority will be given to installations within each of the Council's sheltered housing and purpose-built residential blocks of flats. It will also assist where there is a particular need to control building management systems remotely, for example, lighting, fire systems, security systems, CCTV, lifts, water storage tanks, boosted water pumps and communal gas boilers, as well as a number of other building management services which may require monitoring from a compliance perspective.

(ii) Improving broadband infrastructure and connectivity in North Tottenham/ Northumberland Park – Delivery proposals

- 6.17 As reported to March 2019 Cabinet, the council won £800,000 Government funding as part of the Local London Partnership⁴ to improve the poor internet connectivity in the Northumberland Park area.
- 6.18 The funding will be used to improve high-speed broadband connectivity in the area – by upgrading/installing full fibre/gigabit broadband infrastructure and connectivity to council and community buildings that are close to business locations. In addition, the project will explore more mobile solutions (Wi-Fi and 5G), which will be enabled by the improved fibre broadband infrastructure to the council and community buildings and public areas.
- 6.19 To date, officers have been developing the project and preparing a delivery plan for submission to the Accountable Body (L.B. Bexley) for approval. The work to date has included: assessment and mapping of council and community buildings to be connected at the different stages of the project, identifying the existing infrastructure (ducts, cabinets etc) among other activities. Buildings identified for fibre broadband connections includes the Northumberland Park Resource Centre.
- 6.20 The council has sought to identify CCTV sites which might benefit from fibre broadband upgrade and connectivity – to allow for the use of High Definition Cameras. This broadband project will therefore provide the additional benefit of helping address the crime and perception of crime in the North Tottenham area.

⁴ The Local London Partnership – is made of eight boroughs: Barking & Dagenham, Bexley, Greenwich, Havering, Newham, Redbridge, Waltham Forest and Enfield. L B Haringey made a case to join the partnership specifically for this broadband bid - because of Tottenham's Upper Lea Valley location

- 6.21 Where possible, LBH will co-ordinate its broadband installation with adjacent boroughs, (Enfield and Waltham Forest) to allow for both sides of the Upper Lea Valley (Productive Valley) to benefit from fibre broadband network and combined spending opportunities.
- 6.22 Selection of broadband suppliers for the upgrade and connection work will be via Procurement Framework/Panel which is organised and managed by the Accountable Body for the SIP Broadband Partnership. In terms of receipt of the funding, LBH will claim from the Accountable Body at the different stages of the broadband installation works. The spend profile for the funding is: £400,000 in 2020/21 and £400,000 in 2021/22.

Next steps:

- 6.23 Subject to Cabinet approval, the council will invite Expressions of Interest (EOI) from broadband infrastructure providers. This will be followed by an evaluation and selection process. The broadband supplier(s) selected to partner with the council would then enter into a Non-Exclusive Access Wayleave Agreement with the Council and/or Homes for Haringey.
- 6.24 The Council will ensure that the residents and businesses benefit from the Wayleave/Broadband arrangement by setting contractual output targets in the Council's Wayleave Agreement with the chosen broadband supplier(s). In addition, robust contract management systems and procedures will put in place to manage the installation works and monitor the contractual outputs

7 Contribution to strategic outcomes

- 7.1 The broadband projects set out in the report will support the Council in delivering the Borough Plan's Place, Economy and Housing Priorities:

Priority 3 (Place)

- 7.2 Outcome 12, Objective D (Improve connectivity, both digital and physical): The broadband project will significantly improve the borough's digital connectivity by providing modern high-speed broadband infrastructure and connections to council-owned social housing stock, commercial properties, libraries and other community buildings and facilities. The fibre connections will also contribute to the "Safer Borough" objective through their contribution to the fibre upgrades to the CCTV in the Northumberland Park area

Priority 4 (Economy)

- 7.3 Outcome 14, Objective A (Maximise the benefits of Council, other public sector funding and private investment for the local area): The £800,000 Government funding and the anticipated private sector investment in the borough's digital infrastructure, will contribute to this objective
- 7.4 Outcome 16, Objective A (Ensure investment in the borough increases the number of quality jobs): The broadband upgrades and connectivity to social housing stock, libraries and other community facilities – will improve employment and digital training opportunities to disadvantaged residents. It could also lead to more residents starting digital related businesses.

Priority 1 (Housing)

- 7.5 Outcome 1, Objective D (Secure the delivery of supported housing that meets the needs of older, disabled and vulnerable people in the borough): The Wayleave/Broadband scheme will enable LBH/Homes for Haringey(HfH) to provide the full fibre broadband infrastructure and associated "Smart Building" technologies - that delivers new and innovative services for independent living for people with disabilities, older people and people with special needs. HfH have stated that the broadband upgrades will be essential to delivering its "Supported Housing and Well-Being Hubs".
- 7.6 Outcome 3, Objective B (Improve residents' satisfaction with the service they receive from Homes for Haringey to be in the top quartile for London (78%) by 2022): The broadband upgrades will improve internet connectivity in the housing block/estates and thereby enable tenants to benefit from the opportunities associated with digital connectivity such as easy on-line access to council and other public services, jobs and training opportunities etc.

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

Finance and Procurement

Finance

- 8.1 Council at its meeting of the 25th February 2019, agreed the Council's capital budget for 2019/20, which included the Strategic Investment Pot (SIP) grant funding as detailed below:

2019/20:	£1.75m
2020/21:	£1.4m
2021/22:	£2.65m
Total:	£5.80m

- 8.2 The 2019/20 allocation includes £0.8m funding for the broadband project. To the extent that there is any underspend this financial year the resources will need to be carried forward to meet commitments. To date there has been no expenditure incurred.

Procurement

- 8.3 Strategic Procurement note the contents of the report and that the report is seeking authority commence an activity that will provide greater access to high speed broadband within the borough. It is noted that the report does not request approval to award contracts at this moment.
Strategic Procurement have provided advice relating to the process for the selection of the providers to ensure suitability of the provider and the sustainability of the provision.
Further Procurement advice will be provided on a compliant process once the activity has been approved

Legal

- 8.4 The Assistant Director of Corporate Governance notes the content of the report.
- 8.5 Pursuant to the Council's Contract Standing Order (CSO) 8.01, the Council may procure a contract through the advertisement of the opportunity via the Council's Corporate Sourcing Solution and tenderers may be selected to submit tenders in accordance with one of the procedures outlined in CSO 9.01.2. The use of Expression of Interest to invite potential tenderers is therefore in line with the provisions of CSO 9.01.2.
- 8.6 The Council is proposing to enter into Wayleave Agreements with various broadband suppliers. The details of these agreements are not yet known but it will be for the purposes of Section 123 of the Local Government Act 1972 a disposal of land (includes any interest in land and any easement or right in, to or over land). The Council has a statutory obligation under section 123 to obtain the best consideration that can reasonably be obtained where it is disposing of land otherwise it must seek the consent of the Secretary of State. The Council can rely on the General Disposal Consent 2003 which allows the Council to dispose at less than best consideration subject to the condition that the undervalue does not exceed £2,000,000.00 and the disposal is to help it secure the promotion or improvement of the economic, social or environmental well-being of its area.
- 8.7 Some of the land may be held for housing purposes and the Council cannot dispose of the land without obtaining the consent of the Secretary of State under section 32 of the Housing Act 1985. The Council may be able rely on the General Housing Consents 2013 where the land is vacant.

- 8.8 In granting the wayleaves, Council must comply with state aid rules so further advice will be required once the terms and conditions are known

Equality

- 8.9 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.
- 8.10 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.
- 8.11 This report seeks approval for officers to invite Expressions of Interest from broadband suppliers to install full fibre high-speed broadband infrastructure and connections to council-owned social housing stock, commercial properties, libraries, and other community building and facilities - in exchange for the council entering into a Non-Exclusive Wayleave (Access permission) Agreement ("Wayleave/Broadband Agreement") with the selected broadband supplier(s).
- 8.12 The upgrading of the borough's digital infrastructure as result of granting Wayleaves to broadband suppliers, would have potential benefits for the local communities this proposal affects.
- 8.13 This includes social housing tenants, as a potential of up to 20,000 of the council's social housing stock (including housing estates & blocks, sheltered housing, community facilities etc) would be connected with full fibre infrastructure – at no cost to the council or residents, as well as free Wi-Fi to communal areas of sheltered housing and council-owned community buildings.
- 8.14 Moreover, there is anticipated benefit to community groups and their users, through the provision of free full fibre Internet connection to Community Space (libraries, community halls, schools, youth clubs etc...).
- 8.15 Initiatives that will have a positive impact on low-income groups include:
- Low internet charges for low income and social excluded subscribers who the council identifies as being in particular need.
 - Digital inclusion and training: This will involve recruiting and training local people as Digital Champions in each of the areas and housing estates/blocks the fibre broadband infrastructure and connections take place. These Digital champions will then support, train and develop the digital skills of other

members of their community, in particular the Digitally Excluded (incl. the elderly, those in financial need and those in social need).

- Local employment and apprentice opportunities: This would involve the selected LBH wayleave broadband partner(s) working with the Council's Skill & Employment Team to recruit local people into jobs and apprentice opportunities that may become available in the partner broadband company(ies).

8.16 Many of the above actions would contribute to delivering the council's employment & skills, community wealth/social value agenda - particularly in deprived areas of the borough.

8.17 In conclusion, the proposal will have a positive impact on key groups in the borough, including social housing tenants, community groups, and low-income residents.

9. Local Government (Access to Information) Act 1985

Cabinet report, March 2019:

<http://www.minutes.haringey.gov.uk/ieListMeetings.aspx?CommitteeId=118>

Appendix 1: Wayleaves for broadband investment; *The potential benefits to the Council, economy and community*

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Appendix 1 : Wayleaves for broadband investment; *The potential benefits to the Council, economy and community*

1. Private sector investment in the borough's digital infrastructure at no cost to the council.

Depending on the broadband supplier(s) selected to partner with the council, the estimated private sector capital investment for a full fibre rollout to Haringey council's social housing stock, community facilities and commercial premises would run into millions of pounds.

2. Social housing and community benefits of full high-speed broadband upgrades. Some of the potential benefits and impacts include:

- **Full fibre broadband installation to social housing stock:** The potential of up to 20,000 of the council's social housing stock (including housing estates and blocks, sheltered housing, community facilities etc) being connected with full fibre infrastructure – at no cost to the council or residents
- **Free full fibre Internet connection to Community Space (libraries, community halls, schools, youth clubs etc)** that is passed by the broadband suppliers' network while connecting to the council's social housing stock and commercial premises
- **Free Wi-Fi** to communal areas of sheltered housing and council-owned community buildings
- **Low internet charges for low income and socially excluded subscribers** who the council identifies as being in particular need. Prices for such subscribers could be as low as £10 per month
- **Digital inclusion and training:** This will involve recruiting and training local people as Digital Champions in each of the areas and housing estates/blocks where the fibre broadband infrastructure and connections will take place. These Digital Champions will then support, train and develop the digital skills of other members of their community, in particular the digitally excluded (incl. the elderly, those in financial need and those in social need)
- **Local employment and apprentice opportunities:** This would involve the selected LBH wayleave broadband partner(s) working with the Council's skill and employment team (Haringey Works) to recruit local people into jobs and apprentice opportunities that may become available in the partner broadband company(ies)

Many of the above would contribute to delivering the council's employment and skills, community wealth/social value agenda - particularly in deprived areas of the borough.

3. Potential benefits of Fibre Broadband to the Council and Haringey's economy.

Some of these potential benefits and impacts are outlined below:

- **Flagship regeneration projects:** the successful delivery and greater impact of flagship LBH projects including: the new Council Offices/Civic Building; ADA Digital College, Tailoring Academy, Wayra Tech Accelerator Hub; Creative Enterprise Zone; Productive Valley etc
- **High-speed broadband upgrade of council's commercial premises** – leading to increased rental income for the council
- **New jobs and increased GVA:** A recent forecast economic impact analysis of fibre broadband upgrade in the borough found that:

- If 30% of Haringey's medium size and small business with growth potential were provided with full fibre broadband upgrade - **they will create 1,400 new jobs and generate an equivalent of £133 million in GVA** (Adroit Economic, April 2019)
- **Good return on investment:** A GLA study (2017) found that: for every £1 of public sector funds spent on high-speed broadband, there was a return on investment of £23.70
- **Help the growth of modern and traditional businesses:** through online sales and marketing; improved online ordering and services; technology driven manufacturing/production etc
- **Act as a catalyst:** for attracting new companies and creating new businesses, jobs, skills and qualifications into regeneration areas
- **Help diversify Haringey's economy:** by developing and attracting more modern sectors – tech, high growth digital, business services, technology driven production/manufacturing

4. Local Authority Cost Efficiency

Local Authorities can save money through borough wide deployment of full fibre broadband. These include:

- **Access to Online Services:** More residents with access to high speed, high quality broadband will result in more residents being able to use online Local Authority services; whether this is paying bills online, registering housing repair requests online, or getting access to online NHS services, the internet can help Local Authorities become more cost efficient
- **Housing blocks and other building management services:** Full fibre cabling that runs through housing blocks and other properties has the capacity to support many IOT (Internet of Things) applications. Examples of such applications adopted by Westminster, Southwark and other London councils include:
 - High definition CCTV cameras inside and outside Lifts in housing blocks to deter crime and anti-social behaviour; *low cost connectivity between the in-apartment heating controllers and the central heating control system* enabling a fully automated heating control system

Report for: Cabinet 12th November 2019

Title: Award of Contract for Ferry Lane Public Realm Scheme

Report authorised by : Dan Hawthorn, Director of Housing, Regeneration & Planning.

Lead Officer: Tracey McGovern, Project Manager, Environment and Neighbourhoods.

Ward(s) affected: Tottenham Hale

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

1. Describe the issue under consideration

- 1.1. This report seeks approval for the award by Cabinet of the Ferry Lane Public Realm Scheme contract, following a competitive tendering exercise, to **Bidder 1** for a total value of **£913,115.61** as permitted under CSO 9.07.01(d).
- 1.2. The construction sum to the winning bidder does not include scheme risk and contingency budget. A contingency and risk budget has been set aside and is fully funded, details of which are included within the (exempt) Part B of this report.

2. Cabinet Member Introduction

- 2.1. Ferry Lane is a strategic route providing a gateway into the borough and the emerging Tottenham Hale District Centre. The Green Grid is a key part of our vision for Tottenham Hale and the Tottenham Hale Green and Open Spaces Strategy (GOSS) provides the framework for improvements to those routes between the green and open spaces in the area, and will extend and connect these spaces from the Lea Valley through to the High Road.
- 2.2. The vision for the Ferry Lane Public Realm Scheme is to transform this strategic route into an exemplar project where pedestrian and cycle access is a priority.
- 2.3. The recommendations within this report for the appointment of the preferred bidder to deliver the Ferry Lane Public Realm scheme ensures that those improvements arising from the scheme are delivered for the benefit of local residents.

3. Recommendations

3.1. It is recommended that the Cabinet :

- Approves the award of the contract for the Ferry Lane Public Realm Scheme to **Bidder 1** identified in the exempt report in the sum of £913,115.61 as permitted under CSO 9.07.01(d).
- Authorises the issue of a Letter of Intent (LOI) for the amount of £91,311, being 10% of the contract price.

4. Reasons for decision

- 4.1. The appointment of the preferred bidder will enable the Council to deliver significant highway and public realm improvements for residents in accordance with the Council's Green and Open Spaces Strategy for Tottenham Hale.
- 4.2. Officers have undertaken a **tendering exercise** to secure a contractor to deliver the Ferry Lane Public Realm scheme. Through this process, **Bidder 1** have demonstrated that they should be awarded the contract.
- 4.3. In awarding the contract to **Bidder 1**, the Council is securing delivery of the Ferry Lane Public Realm Scheme.
- 4.4. The scheme will deliver Sustainable Urban Drainage (SUDs), introduction of segregated cycle lanes, improved surfacing, street lighting and minimise maintenance costs in the long term. There is community support for the project as established through the consultation process.

5. Alternative options considered

5.1. Option 1: Do nothing

Pursuing this option would fail to address the lack of a clear link between Tottenham Hale, The Paddock and The Walthamstow Wetland Centre. It would also fail to resolve the safety concerns around cyclists using the main carriageway with minimal protection. Option not recommended.

5.2. Option 2 Direct Award to Term Maintenance Contractor

This option was discounted since the current term Contract expired in October 2019 and it was considered more cost effective to test the market by undertaking a competitive procurement process to secure the most economically advantageous tender to the Council.

5.3. Option 3 In-house delivery

This option was discounted as the Council currently do not have the requisite in-house resource and expertise to construct the Scheme.

6. Background information

6.1. The Green and Open Spaces Strategy (GOSS) and suite of priority projects that includes Ferry Lane Public Realm Scheme were approved by Cabinet in February 2016. A RIBA stage 2 concept design for Ferry Lane was completed in October, 2016 led by Kinnear Landscape architects as part of the GOSS suite of projects to come forward. In January, 2017, Project Centre were appointed to oversee the delivery of the Scheme from RIBA stage 2 to completion. In July, 2019, the Highways team were commissioned by the Regeneration Service to project manage the delivery of the project; this included the tendering and appointment of the main contractor for the works.

6.2. Currently Ferry Lane / Forest Rd is not a comfortable environment for pedestrians or cyclists, with footpaths and cycle routes directly adjacent to a busy roadway. The cycle routes at present are provided on the carriageway and do not afford any protection from vehicles for cyclists. Footways along the route are in need of upgrading. Ferry Lane sits within a high risk flood zone where no Sustainable Urban Drainage features are provided at present to alleviate and attenuate rainfall discharge back into the drainage system. Views into the Paddock and across the reservoirs of the Lee valley are restricted due to enclosures formed by palisade fences and vegetation that block sightlines and add to a feeling of discomfort when walking along the route next to busy road. The Walthamstow Wetlands Centre opened in the summer of 2017 and is attracting a high volume of visitors to the Wetlands centre from outside Tottenham and from across the Country. Ferry Lane is the principle gateway access from Tottenham Hale to the Walthamstow Wetland Centre and at present, there is lack of a co-ordinated wayfinding strategy to aid visitors on the route to the Wetland Centre and equally to highlight other points of interest within Tottenham for visiting and supporting the local economy.

6.3. Key objectives of the scheme are:

- Making the Lea Valley visible, by providing a visual and environmental connection and introducing key aspects of the Paddock and the Wetlands environment onto this key route
- **Linking the two growth areas** and acting as an important gateway to each
- **Deliver a modal shift** in priority from motorised vehicles in favour of pedestrians and cyclists, by providing a safe, attractive and legible route
- **Greening the grey** – bringing the Lee Valley Park into the urban environment by providing an exemplar and sustainable drainage scheme, using a sustainable approach in dealing with surface water while creating a rich and

distinct habitat for wildlife which represents the habitats in the Lea Valley and Wetland

- Providing a step **change in the quality of lighting** to one which is both safe, attractive, and also ecologically sensitive

6.4. The **scope of the proposals** include:

- New trees and soft planting along Paddock frontage and Bream Close junction
- Two-way segregated cycle lane along Ferry Lane
- Footway repaving and road resurfacing
- Installation of improved drainage system which reduces the risk of flooding
- Removal of existing 'Razor Light' lighting column on Tottenham Lock Bridge
- New LED energy efficient street lighting, with lamp-shades designed to be ecologically sensitive and reduce light pollution
- De-clutter the road by removing unnecessary street signage and furniture
- Removal of west-bound bus lane and narrow the carriageway to re-allocate space for enhanced pedestrian and cycle lane
- Relocating existing zebra crossing to improve the pedestrian flow

Funding

6.5. The project is fully funded through the Council Capital funding, Section 106 and Section 278 contributions.

Adjacent work

6.6. The Ferry Lane Public Realm Scheme feeds into the the Construction Logistics Plan (CLP). The CLP aims to co-ordinate, reduce and mitigate the impact of Construction vehicular movements within Tottenham Hale whilst the Tottenham Hale District Centre development sites are built out in the short to medium term. Deliveries to/from Ferry Lane have been restricted in line with the CLP to avoid potential logistic issues with adjacent works.

Consultation

- 6.7. The statutory consultation for the scheme proposal was commenced on 9 November 2017 and closed on the 1st December, 2017. During the consultation period, feedback cards were delivered to residents in the area and an informal drop-in session, to enable residents to discuss the proposals, was held at 'The Engine Room', Eagle Heights, Hale Village N17 on Wednesday 23 November 2017.
- 6.8. Twenty responses were received to the consultation. This number represents approximately 6% of the population in the area proposed for the public realm improvements.
- 6.9. The current scheme is supported by a majority of respondents with 70% (of the 20 respondents) in support of the scheme.

Procurement Process

- 6.10. A competitive mini competition tendering exercise, led by the Council's Strategic Procurement team, was undertaken. Five suppliers from the London Construction Programme (LCP) Major Works 2019 Framework, Lot 5-Highways and Public Realm, were invited to participate in the procurement.
- 6.11. An invitation to tender was issued to all five suppliers, on 24th July 2019, within Lot 5 Highways and Public Realm of the LCP Major Work 2019 Framework. Two of the five suppliers declined to tender and by the set deadline date of 28th August 2019, only one out of the remaining three suppliers had submitted a tender. The Tender was evaluated on the basis of 40% quality and 60% price criteria.
- 6.12. The tender, was checked for completeness and compliance. Following that, a panel of evaluators, made up of four Council officers, conducted the quality evaluation exercise in accordance with the criteria set out in the Invitation to Tender (ITT) document. This was followed by a moderation meeting led by Strategic Procurement to agree on consensus scores.
- 6.13. A parallel commercial/pricing evaluation was undertaken independently, led by Stace LLP the appointed Quantity Surveyor (QS) and Cost Consultant for the project.
- 6.14. Following the two evaluations, the combined score (price and quality) were added to provide an overall total weighted score for the Tender. Table 1.0 below provides a breakdown of the scores.

Table 1.0: Ferry Lane Tender Summary of Scoring

Tenderer	Quality % Score	Price %Score	Total Score
Bidder 1:	30.4	60	90.4

- 6.15. Stace Consultants prepared a Pre-Tender Estimate (PTE) for the works. As tabulated below the PTE represents a tender in second place out of two.

Table 2.0: Ferry Lane Tender Summary of Pricing

Tenderer	Tender Sum (£)	Contract Period (weeks)
Bidder 1	913,115.61	32
Pre-tender estimate	1,130,909.88	32

- 6.16. Despite undertaking a mini competition procurement under the LCP MW19 Major Works Framework, only a single submission was returned. The Council is not obliged to accept or reject a single bid, however, following Strategic Procurement's

(SP's) guidance the evaluation and moderation of the single tender was undertaken with the understanding that value for money should be taken into consideration prior to deciding whether to award the contract.

- 6.17. Absence of competition from alternative suppliers, makes demonstration of value for money difficult, however, SP instructed the Project QS, Stace LLP, to provide recommendations of value for money based on the PTE, bid OHP (Overheads and Profit) figures and any available benchmark information.
- 6.18. The tender received was circa 19% below the Stace LLP PTE value which relates to a difference of £217,794. Further post-tender clarification with the contractor confirmed preliminarily sums were included in the Tender sum and there were no pricing emissions or unaccounted pricing errors detected. Stace LLP, felt that the 17.5% included for OHP might be relatively high compared to an OHP of 12.5% of a relatively similar scheme, however, Stace concluded that the Bid offered value for money despite being the only submission.
- 6.19. The £217,794 difference between Bidder 1 tender sum and the PTE represents 19.26%. The Council's Procurement Code and Contract Standing Orders (CSOs) provide guidelines regarding pricing submissions which are considered abnormally low. Section 11 Abnormally Low Bids of the CSO states:
- 11.1 The Council must consider low value bids and evaluate whether they are abnormally low. Bids are considered abnormally low in comparison with other bids or the Council's own cost estimate, typically this would relate to bids in excess of 20% lower than the Council's estimate or other bids*
- It is noted that the difference between the PTE and Bidder 1 tender sum is 19.26% and within the 20% threshold.
- 6.20. The Bidder 1 tender sum is the most favourable according to the quality/price scoring criteria and is below the PTE indicating good value for money.
- 6.21. The Council is aiming to commence the implementation of these works in March 2020 and complete the works by December 2020.

7. Contribution to strategic outcomes

7.1. This project will contribute to Priority 3 of the Borough Plan 2019-2023. Priority 3 aims to secure a place with strong, resilient & connected communities where people can lead active and healthy lives in an environment that is safe, clean and green.

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

Finance

8.1. In line with the current capital programme plan there is a £1m capital budget earmarked within capital scheme 401 – Tottenham Lane Green Spaces, toward the Ferry Lane project.

8.2. On the assumption that this project is to commence in March 2020, it is likely that most of the spend will occur in 2020/21, thereby creating in-year underspend, which will need to be carried forward as a commitment into 2020/21 capital programme as part of this financial year's closedown.

8.3. Strategic Procurement

8.3.1. Strategic Procurement (SP) confirms that the project was procured by undertaking a mini competition using the LCP MW19 Framework, Lot 5 – Highways & Public Realm in line with CSO 9.01.

8.3.2. SP notes that a single compliant Bid was submitted within the ITT deadline. SP also notes, the appointed Project QS, Stace LLP, undertook an independent pricing evaluation of the Bid, and confirmed that both the Pricing and quality elements of the Bid offered value for money.

8.3.3. SP notes that the ITT submission were evaluated according to the selection criteria of a quality (40%) / price (60%) basis.

8.3.4. SP acknowledges that Bidder 1 achieved QDP of 30.40% and a Pricing score of 60.00%, making a total score of 90.30%

8.3.5. SP has no objections to appoint Bidder 1 to the amount of £913,115.61 excl VAT for a contract period of 32 weeks pursuant to CSO 9.07.1(e)

8.3.6. Furthermore, SP has no objections to approve the issuance of a Letter of Intent (LOI) not exceeding 10% of the contract sum pursuant to CSO 9.07.3

8.4. Legal – Corporate Legal Services

- 8.4.1. The Assistant Director of Corporate Governance notes the content of this report.
- 8.4.2. The report is recommending the award of a public realm scheme contract. CSO 7.01(b) allows the Council to award a contract where the contractor was selected from a Framework which has been established in accordance with the Public Contract Regulations 2015.
- 8.4.3. This is a key decision and the Service have confirmed this on the Forward Plan in accordance with CSO 9.07.1 (e).
- 8.4.4. Pursuant to the CSO 9.07.1(d), Cabinet must approve the award of a contract if the value of the contract is £500,000 or more as is the case with the contract for award in this report.
- 8.4.5. Pursuant to CSO 9.07.3, approval may be granted for the issuance of a letter of intent for a sum not exceeding £100,000 or 10% of the total contract price pending the execution of a formal contract if it is in the best interest of the Council to do so. Although under CSOs the approval may be done by a Director, Cabinet also has power to approve the issuance of a letter of intent.
- 8.4.6. The Assistant Director of Corporate Governance sees no legal reasons preventing Cabinet from approving the recommendations in the report.

8.5. Equality

- 8.5.1. 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.
- 8.5.2. 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.

8.5.3. The decision is to approve the award of a contract to undertake the Ferry Lane Public Realm Scheme. It follows the decision by Cabinet in February 2016 to approve the Tottenham Hale Delivery: District Centre Framework. This decision was subject to an Equalities Impact Assessment, which can be accessed [here](#).

8.5.4. Those most affected by the decision include residents of Tottenham Hale ward. Relative to Haringey as a whole, the population of Tottenham Hale includes:

- More residents aged 0-19 and 20-44
- Fewer White British residents and significantly more residents from Black/African/Caribbean/Black British communities
- More Christian and Jewish residents
- More residents with a limiting long-term health condition or disability

The main likely impacts of the decision, drawing on the scope noted in para.8.1 are:

- Improved access to green and open space
- Improved walking and cycling infrastructure through footway repaving, a segregated cycle lane, and re-allocation of carriageway
- Improved visibility through street lighting measures

8.5.5. It is likely that the decision will result in positive physical health impacts for the population of Tottenham Hale due to improvements in air quality and measures to increase physical activity. It is also likely that the decision will have a positive impact with regard to community safety due to improvements in the public realm that address factors that may increase opportunistic criminal activity. These measures go some way to addressing known inequalities. It is notable that Tottenham Hale has significantly higher levels of air pollution than the Haringey average, that the population of Tottenham Hale has lower healthy life expectancy than the Haringey average, and that Tottenham Hale has a higher rate of crime than the Haringey average.

8.5.6. In order to fully realise potential positive impacts for groups with protected characteristics, the delivery of the regeneration scheme will need to have regard for existing inequalities in the ways groups with protected characteristics experience and use public space and the different needs of these groups. In particular, the design and delivery of the scheme will need to have due regard for the different access needs of individuals with disabilities and pregnant women.

8.5.7. As a body carrying out a public function on behalf of a public authority, the contractor will be required to have due regard for the need to achieve the three aims of the Public Sector Equality Duty, noted above. Arrangements will be in place to monitor the performance of the contractor and ensure that any reasonably possible measures are taken to address any issues that may occur that may have a

disproportionate negative impact on any groups who share the protected characteristics.

9. Use of Appendices

9.1. None

10. Local Government (Access to Information) Act 1985

10.1. Minutes from Cabinet Meeting on Tuesday 16th February 2016 can be found here:
<http://www.minutes.haringey.gov.uk/documents/s83531/160125%20Cabinet%20Report%20Tottenham%20Hale%20Delivery%20FINAL.pdf> detailing the decision referenced in paragraph 6.1 of this report.

10.2. This report contains exempt and non-exempt information. The exempt information is not publication as it contains information classified as exempt under the following categories (identified in the amended Schedule 12A of the Local Government Act 1972):

(3) Information relating to the financial or business affairs of any particular person (including the authority holding that information).

Report for Cabinet 12 November 2019

Title: Novation of SAP Managed Service Contract under Contract Standing Order(CSO) 10.03

Report authorised by : Richard Grice Director for Customers, Transformation and Resources

Lead Officer: Carla Villa, x3111, carla.villa@haringey.gov.uk

Ward(s) affected: N/A

Report for Key/ Non Key Decision: Key Decision

1. Describe the issue under consideration

This report seeks approval from Cabinet for the implementation of Contract Standing Order 10.03, which provides that contract novations valued at £500,000 (five hundred thousand pounds) or more may only be awarded, assigned or novated by the Cabinet.

2. Cabinet Member Introduction

To novate the contract for the SAP managed service to replace the company serving as the Council's main contractor by another company within the HCL group. This will allow for a continuation of the service for Finance, Payroll, HR and Procurement systems until 15/3/20 when the contract expires.

3. Recommendations

- 3.1 To approve the novation of the SAP Managed Service Contract from Axon Solutions Ltd T/A HCL Axon to HCL Technologies UK Ltd under Contract Standing Orders 10.03 and **9.07.1(d)**.
- 3.2 To note that the contract value over the life of the contract, from the contract start on 16/9/13 until the contract's current 6 month extension expires on 15/3/20, is £4,124,447.00.

4. Reasons for decision

To make a decision as Axon Solutions T/A HCL Axon is being wound up as part of a restructure to reduce a complicated structure of the European companies within the HCL group and it will no longer exist. Axon Solutions T/A HCL Axon is proposing to novate the contract from them to another company within the HCL group, HCL Technologies UK Ltd, to allow for a continuation of the service provided. HCL's parent company in India, HCL Technologies Ltd is, and would remain after the proposed contract novation, a co-contractor with the relevant HCL subsidiary.

5. Alternative options considered

- 5.1 Axon Solutions Ltd said that we are required to novate the contract as they are winding down the company due to a restructure.
- 5.2 Contract termination was considered but were unable to terminate as we require their services until the contract end.

6. Background information

In 2013 a contract was let for the SAP Managed Service for a term of 6+2+2 years. The contract recently arrived at the end of the initial term (6 years) on 16/9/19 and approval has been granted by the Director for Customers, Transformation & Resources for the current contract to be varied and extended for 6 months rather than 2 years. The contractor's responsibilities under the contract are shared between one HCL group subsidiary, a UK-registered company, Axon Solutions Ltd t/a HCL Axon, which provides the hosting, scanning, printing and invoicing and the HCL parent company registered in India, HCL Technologies Ltd, which provides the support and any development of the application. Under the proposed novation, Axon Solutions Ltd t/a HCL Axon would cease to be a party to the contract and would be replaced by a different UK-registered HCL subsidiary company, HCL Technologies UK Ltd, which will take over responsibility for the relevant service provision until the contract ends.

7. Contribution to strategic outcomes

To ensure continued service delivery until the end of the contract.

8. Statutory Officers comments

8.1 Finance

The proposed novation is required to ensure the continuation of the Council's SAP hosted managed service and payments for the service until contract expiry. There are no other financial implications arising from the contents of this report.

8.2 Statutory legal comments on behalf of the assistant Head of Corporate Governance

- 8.2.1 Cabinet approved the award of the initial contract for the provision of a SAP managed service on 9th July 2013 to Axon Solutions Ltd t/a HCL Axon with an affiliate company, HCL Technologies Ltd, as a co-contractor.
- 8.2.2 This report is recommending approval of the novation of that contract from the main contractor, Axon Solutions Ltd t/a HCL Axon, to an affiliate company within the HCL group of companies, HCL Technologies UK Ltd, with the other original co-contractor company, HCL Technologies Ltd, continuing on in that role.

8.2.3 Under CSO 10.03 the Council may agree to the novation of a contract in the circumstances permitted under Reg. 72 of the Public Contracts Regulations 2015 (PCR 2015). Under CSO 9.07.1(d) the novation must be approved by Cabinet if the contract was valued at over £500,000 at the time of the award, as was the case with the SAP contract.

8.2.4 Under PCR 2015, reg. 72(1)(d)(ii) a novation is permitted where the company to which a contract was originally awarded is replaced by another company pursuant to a corporate restructuring provided certain other conditions are met. The other conditions are that the company to which the contract is being novated must meet the qualitative selection criteria of the contracting authority, the Council in this case, and there must be no other substantial changes to the original contract. The novation must also not be just an attempt to circumvent the requirements of the PCR 2015 (such as the usual requirement for tendering a contract). In this case, Legal Services have been consulted on the preparation of the novation agreement and confirm that no material contract changes are proposed other than the novation itself. The Council has also received assurances from the HCL Group that the proposed novation is being done as part of a bona fide rationalisation of their corporate structures to streamline business efficacy. In light of this and also of the confirmation by Strategic Procurement (see para. 8.3 of this report) that they have done due diligence on the HCL company taking over as main contractor, ie. HCL Technologies UK Ltd, and have no objections to the novation, the proposed novation appears to be permitted under the above PCR 2015 provision.

8.2.5 The Assistant Director of Corporate Governance is not aware of any legal reasons preventing Cabinet from approving the recommendation in the report.

8.3 Procurement

CSO 10.03 allows that a contract may be novated in circumstances permitted in Regulation 72 of the Public Contract Regulations.

Regulation 72(1)(d)(ii) allows for the novation of the contract following a corporate restructure.

Due diligence has been undertaken on the novations and therefore Strategic Procurement have no objections to the novation

8.4 Equalities

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.

There are no particular equalities implications arising from the proposed decision. As an organisation undertaking a public function on behalf of a public body, the contractor will be required to comply with the Public Sector Equality Duty within the scope of the contract.

9. Use of Appendices

None

10. Local Government (Access to Information) Act 1985

None

Report for: Cabinet – 12 November 2019

Title: Regulation of Investigatory Powers Act (RIPA) 2000: Use within the Council 2019/20 and review of to the Council's investigatory powers policies

**Report
Authorised by :** Bernie Ryan
AD Corporate Governance

Lead Officer: Terese Johansson
Business Manager for Corporate Governance
Ext: 3975
Email: terese.johansson@haringey.gov.uk

Ward(s) affected: All

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

1. Describe the issue under consideration

- 1.1 To inform Cabinet about issues relevant to the use of investigatory powers (under the Regulation of Investigatory Powers Act (RIPA) 2000 and Investigatory Powers Act (IPA) 2016) and provide a refreshed policy for approval.

2. Cabinet Member Introduction

- 2.1 RIPA provides a statutory framework for public authorities to use covert investigatory techniques, such as surveillance, where necessary and proportionate, for the purpose of preventing or detecting crime.
- 2.2 The Council uses RIPA infrequently, but is required to report the use of directed surveillance to members. I am satisfied that the Council uses the powers afforded to it under the RIPA legislation appropriately.
- 2.3 Changes brought in by the IPA provide a new framework for dealing with communications data; previously RIPA covered communications data. On this basis, I recommend that Cabinet approve the revised RIPA policy for covert surveillance and covert human intelligence sources and a new, separate policy specific to communications data under IPA 2016.

3. Recommendations
That Cabinet:

- 3.1 Notes the use of RIPA by the Council;
- 3.2 Approves the amended RIPA policy at Appendix 1; and
- 3.3 Approves the new IPA policy at Appendix 2.

4. Reasons for decision

- 4.1 The RIPA codes of practice state that members should review the Council's use of investigatory powers at least annually. Therefore, although the powers under RIPA have been used sparsely in recent years, it is nevertheless important for members to be aware of the extent of usage.
- 4.2 There have been multiple legislative changes for investigatory powers since 2018. Therefore, it is important that the existing policy is updated. The proposed new policies reflect the most recent law and codes of practice.

5. Alternative options considered

- 5.1 Not applicable. If the Council's use of investigatory powers was not noted, the Council would not be complying with the codes of practice and so this alternative has not been considered. Similarly, if the existing policy is not updated as suggested it will not account for changes in the law and codes of practice and so this alternative has not been considered.

6. Background information

RIPA

- 6.1 The Regulation of Investigatory Powers Act (RIPA) 2000 was brought in to force in England and Wales in 2000. The purpose of the Act was to ensure that investigatory powers are used in accordance with human rights.
- 6.2 RIPA enables local authorities to use certain investigatory powers for the purpose of preventing and detecting crime, as long as specified procedures are followed. The information obtained as a result of the use of investigatory powers can be relied upon in court proceedings, provided RIPA is complied with. The Home Office issues codes of practice for the use of these investigatory powers, which offer further guidance.
- 6.3 RIPA local authority investigatory powers comprise:
 - Covert surveillance including: monitoring, observing, or listening to persons, their movements, their conversations or other activities. Recording anything monitored, observed or listened to in the course of surveillance. Surveillance by, or with the assistance of, a surveillance device.
 - The use of Covert Human Intelligence Sources (CHIS).
- 6.5 Before a local authority can use these investigatory powers, officers must obtain:
 - Internal authorisation from a director or equivalent; and

- Independent, external authorisation from a Justice of the Peace at a Magistrates' Court.
- 6.6 Local authority use of RIPA is also restricted to the investigation of criminal offences:
- Carrying a minimum sentence of imprisonment for six months or more
 - Relating to the underage sale of alcohol, tobacco and nicotine inhaling products.
- 6.7 The Home Office published revised codes of practice for covert surveillance and covert human intelligence source in August 2018. The revised policy at Appendix 1 ensures compliance with the latest codes of practice.
- 6.8 There have been no substantive changes to the Council's powers to use covert surveillance and Covert Human Intelligence Sources (CHIS) under RIPA.

IPA

- 6.9 The Investigatory Powers Act (IPA) 2016 provides a new legal framework for the acquisition of communication data. Communication data was previously dealt with under RIPA 2000.
- 6.10 Under IPA, local authorities can access certain communications data. Communications data is defined as the 'who', 'when', 'where' and 'how' of communication, but not the content of it. For example, information regarding the timing, sender and recipient of a message but not the actual content of the message.
- 6.11 The Council's powers remain broadly the same under IPA as under RIPA. It is still the case that the Council can only obtain communications data for preventing or detecting criminal offences or preventing disorder, and independent, external authorisation must be given before such data can be obtained.
- 6.12 However, there are five key changes from the treatment of communications data in the Council's policy approved in August 2018:
- 1) The external, independent authorisation must now be given by the Investigatory Powers Commission (IPC) via its staff in the Office for Communications Data Acquisition (OCDA). Previously, authorisation was given by a Justice of the Peace in a Magistrates' Court.
 - 2) When seeking authorisation, the Council must now use the services of the National Anti-Fraud Network (NAFN), who will submit the application to OCDA on the Council's behalf. The NAFN will scrutinise applications independently and provide advice to ensure the Council acts in an informed and lawful manner.

- 3) Communications data is now defined as falling into two categories: entity data and events data.
 - 4) Entity data is information about a person or a thing (such as a device) or information linking them. For example, information about which person is the account holder of email account example@example.co.uk. Entity data can now be obtained when seeking to prevent or detect any crime (irrespective of its seriousness) or to prevent disorder.
 - 5) Events data concerns specific communications. For example, information about who sent a particular email or the location of a mobile phone when a call was made. Events data has a higher threshold than entity data. Events data can now only be obtained when seeking to prevent or detect *serious* crime. This includes criminal offences carrying a maximum sentence of at least 12 months' imprisonment, offences committed by corporate bodies and offences involving (as an integral part) the sending of a communication or breach of a person's privacy.
- 6.13 The majority of the IPA 2016 powers do not apply to the Council. For example, the Council cannot intercept communications, obtain internet connection records or obtain bulk data.

Oversight

- 6.14 The use and application of RIPA and IPA legislation are monitored by the Investigatory Powers Commissioner's Office (IPCO). Visits are made to local authorities to monitor compliance with RIPA and IPA legislation by IPCO and they require annual returns to be made and performance information to be provided.

7. Operational Procedures in Haringey

- 7.1 The Home Office codes of practice recommend that a member of the organisation's corporate leadership team should be the Senior Responsible Officer for oversight of RIPA. Within Haringey, the Senior Responsible Officer (SRO) is the Assistant Director of Corporate Governance, who has been provided with guidance on the SRO role and its responsibilities.
- 7.2 The officers listed in Appendix 1 – RIPA Policy October 2019, Annex B may provide internal approval of RIPA forms prior to seeking judicial approval. The officers listed in Appendix 2 – IPA Policy October 2019, Annex A may provide internal approval of IPA forms prior to seeking independent authorisation. These officers have been trained in the use and application of RIPA and IPA. Refresher training is provided on a regular basis to ensure all officers are kept up to date with their roles and responsibilities.
- 7.3 Haringey has produced its own local procedure notes for RIPA and IPA, which are in accordance with the Home Office's requirements; and these are

circulated to all officers involved in RIPA when updates to the legislation or standard forms are issued. These operational procedure notes are also available on the Council's intranet site.

- 7.4 Haringey makes very limited use of RIPA and has always complied fully with the legislative requirements. A summary of the total number of applications to use RIPA (including communications data prior to the IPA 2016 coming into force) from 2015/16 to September 2018/19 is given in Table 1 below.

Table 1

Year	2015/16 applications	2016/17 applications	2017/18 applications	2018/19 applications
Service area				
Community Safety & Regulatory Services	1	0	0	0
Total	1	0	0	0

- 7.5 Table 2 below provides details of the use made of RIPA during 2015/16 to 2018/19.

Table 2

Service area	Use applied for	Application authorised
Community Safety & Regulatory Services 2015/16	Covert surveillance to capture evidence of the trade of illegally slaughtered sheep/goat carcasses.	Yes

- 7.6 There has been one application for covert surveillance so far in the financial year 2019/20, relating to social housing fraud matter which is being investigated by the Council's Fraud Team.
- 7.7 The Council was last subject to an inspection visit from the Office of the Surveillance Commissioner during November 2016 and the Council reported nil usage of its powers during 2018 to the Investigatory Powers Commissioner's Office.

8. Contribution to strategic outcomes

- 8.1 The Council needs to comply with relevant legislation to ensure that directed surveillance is undertaken lawfully.

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

9.1 Finance

- 9.1.1 There are no direct financial implications arising from this report. The work within Audit & Risk Management and other services to undertake and manage RIPA in accordance with statutory requirements is contained and managed within the relevant services' revenue budgets.

9.2 Legal

- 9.2.1 The Assistant Director of Corporate Governance has been consulted in the preparation of this report, and in noting that the RIPA and IPA procedures follow legislative requirements / industry guidance and best practice, has no comments. The relevant legislation is referred to in the main body of the report.

9.3 Equality

- 9.3.1 The Council has a public sector equality duty under the Equality Act 2010 to have due regard to the need to:

- eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
- advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

The 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.

- 9.3.2 The proposal seeks to separate one policy into two, in order to reflect changes to national legislation. The underlying principles, purpose and application of the policy has not been altered. There are no known implications on individuals or groups with protected characteristics. The policies provide the framework for authorising and conducting of surveillance and the retention of records and this does not adversely impact on any particular group. The Council's investigatory powers policies actively seek to promote transparency in decision-making. The Council's internal process ensures that requests for authorisation to use RIPA or IPA consider any potential impact on individuals and groups who share protected characteristics.

10. Use of Appendices

Appendix 1 – RIPA Policy October 2019.

Appendix 2 – IPA Policy October 2019.

11. Local Government (Access to Information) Act 1985

RIPA codes of practice, which can be found here:

<https://www.gov.uk/government/collections/ripa-codes>

IPA Communications data code of practice, which can be found here:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/757850/Communications_Data_Code_of_Practice.pdf

REGULATION OF
INVESTIGATORY
POWERS ACT 2000:

COVERT SURVEILLANCE AND COVERT
HUMAN INTELLIGENCE SOURCES

HARINGEY POLICY

Policy History					
Version	Summary of Change	Contact	Implementation Date	Review Date	EqIA Date
10.1	<ul style="list-style-type: none"> Updated use of open source material guidance Updated Authorised Officer list 	Head of Audit & Risk Management	November 2015	October 2016	June 2014
10.2	<ul style="list-style-type: none"> Updated Authorised Officer list Updated guidance on social media 	Head of Audit & Risk Management	March 2017	March 2018	June 2014
10.3	<ul style="list-style-type: none"> Updated Authorised Officer list Updated reference para 8.2. 	Head of Audit & Risk Management	August 2018	August 2019	June 2014
10.4	<ul style="list-style-type: none"> Updated to account for changes made by the Investigatory Powers Act 2016 coming into force: communications data dealt with separately 	Business Manager for Corporate Governance	November 2019	November 2020	October 2019

Links and Dependencies
RIPA – Procedure/Guidance Notes Corporate Anti-fraud Policy and Fraud Response Plan Whistleblowing Policy Sanctions Policy Anti-money Laundering Policy Anti-bribery Policy Employee Code of Conduct

Related Forms
RIPA Authorisation for Directed Surveillance RIIPA Review of Directed Surveillance Authorisation RIPA Renewal of Directed Surveillance Authorisation RIPA Cancellation of Directed Surveillance Authorisation

1. Policy statement

- 1.1 Haringey Council will apply the principles of the Regulation of Investigatory Powers Act 2000 (RIPA) to all activities where covert surveillance or covert human intelligence sources are used. In doing so, the Council will also take into account its duties under other legislation, in particular the Protection of Freedoms Act 2012; Human Rights Act 1998; and Data Protection Act 2018, and its common law obligations.
- 1.2 The purpose of this policy is to ensure that:
- an individual's right to privacy is not unlawfully breached;
 - the investigation is necessary and proportionate to the alleged offence;
 - proper authorisations are obtained for the use of covert surveillance and covert human intelligence sources;
 - the proper procedures are followed; and
 - is the use of covert surveillance and covert human intelligence sources are considered as a last resort having exhausted all other avenues.
- 1.3 The procedure for communications data has now changed and is dealt with under the Investigatory Powers Act 2016 and in a separate policy.

2. Overview and purpose of investigatory powers

- 2.1 RIPA came into force in 2000. It aims to balance the rights of individuals with the need for law enforcement and security agencies to have powers to perform their roles effectively. Any interference with an individual's human rights must be proportionate, necessary and non discriminatory, in order to comply with the European Convention on Human Rights.
- 2.2 RIPA allows local authorities to collect evidence of criminal activity lawfully where the investigation requires covert surveillance or covert human intelligence sources (CHIS, e.g. informants). The Home Office RIPA Codes of Practice provide further detailed guidance.
- 2.3 Any local authority who wishes to authorise such investigations must: (1) obtain internal authorisation from the relevant officer, and then (2) obtain approval from a Magistrates' Court before that it can take effect.
- 2.4 The Covert Surveillance and CHIS Codes of Practice from August 2018 require a Senior Responsible Officer (SRO) to be appointed. The Assistant Director of Corporate Governance is Haringey's SRO. The SRO is responsible for:
- the integrity of the processes in place within the public authority;
 - compliance with the relevant legislation and codes of practice;

- oversight of reporting of errors to the Investigatory Powers Commissioner, and the identification of both the cause(s) of errors and the implementation of processes to minimise repetition of errors;
- engagement with the Investigatory Powers Commissioner and inspectors who support the Commissioner when they conduct their inspections;
- where necessary, oversight of the implementation of post-inspection action plans;
- ensuring that all authorising officers are of an appropriate standard, addressing any recommendations and concerns in the inspection reports.

- 2.5 Failure to comply with RIPA may mean that the Council's actions are unlawful and/or that the evidence obtained would be inadmissible in court proceedings and jeopardise the outcome of such proceedings. Such action could also lead to a successful claim for damages against the Council.
- 2.6 Further information on RIPA can be obtained from the Investigatory Powers Commissioner's Office, the body responsible for overseeing the use of investigatory powers, and the RIPA Codes of Practice (as updated from time to time).
- 2.7 The Council's RIPA Procedure Notes provide guidance to investigating and authorising officers when undertaking RIPA activities. Copies of all relevant application, review, renewal and cancellation forms, together with the application for judicial approval form are held on the Council's Intranet. The Business Manager for Corporate Governance should be contacted in the first instance if covert surveillance or use of a covert human intelligence source (CHIS) is being considered.

3. Restrictions on the use of RIPA

- 3.1 Under RIPA, in certain circumstances the Council has power to use:
- i covert surveillance (Part II of RIPA); and
 - ii covert human intelligence sources (Part II of RIPA).

Covert surveillance

- 3.2 Local authority use of covert surveillance is restricted to:
- Preventing or detecting criminal offences punishable by a maximum term of at least 6 months imprisonment;
 - Preventing disorder involving a criminal offence punishable by a maximum term of at least 6 months imprisonment; or
 - Preventing or detecting criminal offences related to the underage sale of alcohol, tobacco or nicotine inhaling products.

Covert Human Intelligence Sources (CHIS)

- 3.3 Local authority use of CHIS under RIPA is restricted to:

- Preventing or detecting crime; or
- Preventing disorder.

3.4 The relevant RIPA tests of necessity and proportionality must still be applied and prior JP approval obtained before any surveillance takes place.

4. Authorisation and duration of RIPA activities

Authorisation

- 4.1 Each investigation involving covert surveillance or covert human intelligence sources must first be authorised internally within the council in writing. All applications must use the forms provided on the Council's intranet and, following internal approval, all applications must also be externally authorised by a Justice of the Peace (JP). Annex A provides a summary flow chart of the RIPA process. No investigation can commence until both internal and external authorisations have been given.
- 4.2 The application form will only be considered by a JP if it is authorised by a relevant authorising officer. Authorising officers are those listed at Annex B to this policy. Authorising officers can only authorise the use of RIPA if they have completed the SRO approved training. Guidance on completing the application and authorisation process is included in the Council's RIPA Procedure Notes and further advice can be obtained from the Business Manager for Corporate Governance.
- 4.3 For any urgent applications, the Business Manager for Corporate Governance and Legal Services should be contacted at the earliest opportunity in order to make urgent arrangements to see a JP. The application form and internal authorisation will still be needed but the time taken to get judicial approval may be reduced.

Duration

- 4.4 Authorisations only remain valid for specific periods and may require renewal or cancellation. The relevant authorisation durations are:
- Covert surveillance: 3 months
 - CHIS: 12 months
 - Juvenile CHIS: 4 months

Review

- 4.5 Authorisations should be reviewed periodically. The CHIS Code of Practice (August 2018) states that a juvenile CHIS should be reviewed at least once per month. Authorisations should be kept under regular review, especially if the risk of obtaining private information or of collateral intrusion is high, and in accordance with the circumstances of the case. Internal reviews should be recorded on the relevant forms, but do not need approval by a JP.

Cancellation

- 4.6 Authorisations must be cancelled if the conditions are no longer met. Authorisations do not automatically expire when the conditions are no longer met and therefore cancellations should be made at the earliest opportunity. If the conditions for surveillance being carried out are no longer satisfied, and the authorisation period has not ended, a cancellation form must be completed and all those involved in the surveillance should receive notification of the cancellation, which must be confirmed in writing at the earliest opportunity. Cancellations do not need any additional approval from a JP.

Renewal

- 4.7 Authorisations can be renewed, but these will be subject to the same internal and external authorisation processes to determine whether the grounds for authorisation still exist. A renewal can be granted for the same period as the original authorisation and will take effect from the date of expiry of the original authorisation. Any renewal application must take place prior to the expiry of the original authorisation. If this timeframe cannot be met, no further surveillance can be carried out until a further application has been authorised.

5. Covert Human Intelligence Sources (CHIS)

- 5.1 If a CHIS is to be used, there are detailed requirements regarding management of their activities which are set out in the Home Office Code of Practice. The use of a CHIS who is an adult and not a vulnerable person can be authorised by any of the authorising officers listed in Annex B. In a case where the proposed CHIS is a juvenile or a vulnerable person, only the Head of Paid Service (i.e. at Haringey, the Chief Executive) can grant an authorisation.
- 5.2 Before making any decisions about using a CHIS, the Assistant Director of Corporate Governance and Business Manager for Corporate Governance must be consulted. There are statutory risk assessment requirements specified in section 29 of the Act which are designed for the safety of the individual acting as a CHIS and the protection of the human rights of those who may be directly or indirectly involved in the operation. Guidance on the use of a CHIS is contained in the Council's RIPA Procedure Notes, including the records which must be kept when using a CHIS.

6. Social networking sites and internet sites

- 6.1 Social networking and internet sites are easily accessible, but if they are going to be used during the course of an investigation, the investigator must consider whether RIPA authorisation should be obtained.

- 6.2 In most cases, the Council will not seek to covertly breach a site's access controls, but if this is deemed necessary and proportionate, the minimum requirement is an authorisation for covert surveillance. An authorisation for the use and conduct of a CHIS is necessary if a relationship is established or maintained by the officer (i.e. the activity is more than simply reading the site's content). This could occur if an officer covertly asks to become a 'friend' or 'network contact' of someone on a social networking site and establishes a relationship or engages the individual in communication in order to obtain information. An investigator should not attempt to set up an account which adopts the identity of a person likely to be known to the subject of the investigation without authorisation and the explicit consent of the person whose identity is being used.
- 6.3 It is the responsibility of the individual to set privacy settings to protect unsolicited access of private information. Where privacy settings are available, but not applied, the data may be considered 'open source' and a RIPA authorisation is not usually required. However, repeated viewing of open source sites may constitute directed surveillance and whether authorisation is required should be considered on a case by case basis. Officers should also take account of the guidance issued by the Investigatory Powers Commissioner's Office (IPCO) in this respect.

7. Requests to undertake covert surveillance using CCTV

- 7.1 The Council's CCTV control room staff may be requested to undertake covert surveillance on behalf of other enforcement authorities, including the police. The Council supports working with external enforcement agencies and organisations to prevent and detect crime; but any requests must be supported by an appropriate RIPA authorisation from the relevant enforcement authority and be provided to the CCTV Manager before the covert surveillance is commenced.
- 7.2 Surveillance that is unforeseen and undertaken as an immediate response to a situation such that it would not be reasonably practicable to obtain an authorisation under RIPA falls outside the definition of directed surveillance and therefore authorisation is not required.

8. Records and inspections

- 8.1 RIPA requires the Council to maintain records, including details of all applications, reviews, renewals and cancellations. The Business Manager for Corporate Governance maintains the central record on behalf of the SRO, and retains hard and electronic copies of all forms and JP approval records.
- 8.2 The documents in the central record are retained in accordance with legal services' records management policy, which complies with relevant data protection legislation. The original documents should be retained by the service area responsible for the surveillance activity.

- 8.3 The Investigatory Powers Commissioner's Office (IPCO) monitors compliance with RIPA. Haringey's SRO and Business Manager for Corporate Governance will act as the first point of contact for the Inspectors, but all service areas that use RIPA should expect to be involved in any inspection visits.

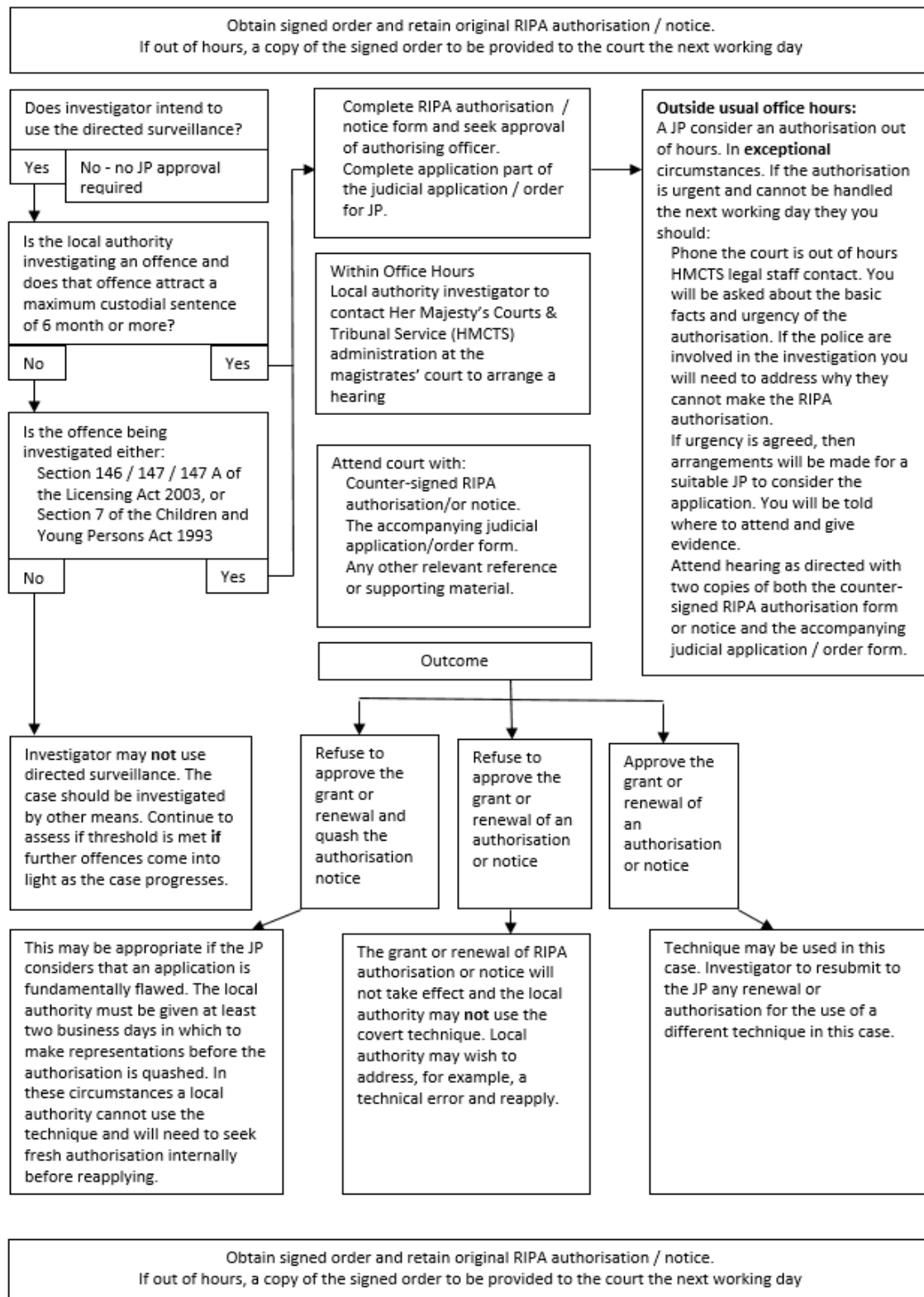
9. Monitoring and Reporting

- 9.1 The Assistant Director of Corporate Governance is responsible for the maintenance and operation of this policy, as the Council's nominated SRO under RIPA. The Assistant Director of Corporate Governance will liaise with the Business Manager for Corporate Governance to review the policy on a regular basis.
- 9.2 Regular reports will be made to Members in accordance with the requirements of the RIPA Codes of Practice.

Annex A

LOCAL AUTHORITY PROCEDURE: APPLICATION TO A JUSTICE OF THE PEACE SEEKING AN ORDER TO APPROVE THE GRANT OF A RIPA AUTHORISATION OR NOTICE

Local authority investigator wants to use a RIPA technique (directed surveillance or CHIS (covert human intelligence source))



Annex B

Haringey Council - Authorising Officers for RIPA

Job Title
Chief Executive (applications relating to confidential information and juvenile or vulnerable adult CHIS can only be authorised by the Chief Executive)
Director of Finance
Director of Environment and Neighbourhoods
Assistant Director for Stronger Communities

INVESTIGATORY
POWERS ACT 2016:
COMMUNICATIONS DATA

HARINGEY POLICY

Contents

1. Overview of IPA 2016
2. Policy statement
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12. Renewal of authorisations
13. Cancellation of authorisations
14. Offences for non-compliance with IPA 2016
15. Monitoring and record keeping
16. Errors
17. Investigations resulting in criminal proceedings

Policy History					
Version	Summary of Change	Contact	Implementation Date	Review Date	EqIA Date
1.0	New policy following the coming into force of the IPA 2016.	Business Manager for Corporate Governance	November 2019	October 2020	October 2019

Links and dependencies
Corporate Anti-Fraud Policy and Fraud Response Plan Whistleblowing Policy Sanctions Policy Anti-Money Laundering Policy Anti-Bribery Policy Employee Code of Conduct

Related forms
IPA Communications Data Authorisation IPA Application for Communications Data

1. Overview of IPA

- 1.1 The Investigatory Powers Act ("IPA") 2016 regulates access to communications data. It requires local authorities to follow a specific procedure and obtain independent authorisation before obtaining communications data.
- 1.2 Failure to comply with IPA 2016 may mean that the Council's actions are unlawful and amount to a criminal offence. It may also mean that the evidence obtained would be inadmissible in court proceedings and jeopardise the outcome of such proceedings. Such action could also lead to a successful claim for damages against the Council.
- 1.3 It is in the public interest for criminal investigations to be undertaken efficiently and promptly. Therefore, where proportionate and necessary, the IPA should be used as a tool to advance criminal investigations accordingly.
- 1.4 This policy should be read in conjunction with the latest Home Office Code of Practice on Communications Data.

Please note that, at the time of writing, the code published in November 2018 is not fully up to date with legislative changes. A new code is expected to be published soon. Therefore, legal services should always be consulted if an officer is considering obtaining communication data.

- 1.5 Further information on IPA can be obtained from the Investigatory Powers Commissioner's Office, the body responsible for overseeing the use of investigatory powers.
- 1.6 The procedure for use of surveillance and covert human intelligence sources (CHIS) is dealt with under the Regulation of Investigatory Powers Act 2000 and in a separate policy.

2. Policy statement

- 2.1 Haringey Council will apply the principles of IPA 2016 when obtaining communication data. In doing so, the Council will also take into account its duties under other legislation, in particular the Human Rights Act 1998, Data Protection Act 2018 and its common law obligations.
- 2.2 The purpose of this policy is to ensure that:
 - an individual's right to privacy is not unlawfully breached;
 - the investigation is necessary and proportionate to the alleged offence;
 - proper authorisations are obtained for obtaining of communications data; and
 - the proper procedures are followed.

3. Communications data

- 3.1 Communications data includes the 'who', 'when', 'where', and 'how' of a communication but not the content i.e. what was said or written. It includes the way in which, and by what method, a person or thing communicates with another person or thing. It excludes anything within a communication including text, audio and video that reveals the meaning, other than inferred meaning.
- 3.2 Communications data can include the address to which a letter is sent, the time and duration of a communication, the telephone number or email address of the originator and recipient, and the location of the device.
- 3.3 It covers electronic communications including internet access, internet telephony, instant messaging and the use of applications. It also includes postal services.
- 3.4 Communications data is generated, held or obtained in the provision, delivery and maintenance of communications services including telecommunications or postal services.
- 3.5 Communications data is defined as 'entity data' and/or 'events data'. These terms are defined in the Code of Practice on Communications Data. However, in essence:

Entity data is data about a person or thing (such as a device) or information linking them, that can change over time. For example, information about which person is the account holder of email account example@example.co.uk.

Events data concerns specific communications. For example, information about who sent a particular email or the location of a mobile phone when a call was made. There is a higher threshold to obtain events data than for entity data.

4. Data that cannot be requested under IPA 2016

- 4.1 The Council does not have legal power under IPA 2016 to:
- Intercept communications data;
 - Access the content of data communications e.g. the content of text messages, emails etc.;
 - Access internet connection records.



5. Authorisations

5.1 It is crucial that the obtaining of communications data is properly authorised. No officer may seek to obtain any form of communication data unless he has obtained the proper authorisation to do so, i.e.

- An Approved rank officer (ARO) must be consulted.
- The application must be provided to the Single Point of Contact (SPoC).
- The application must be approved by the Office for Communications Data Authorisations (OCDA).

5.2 Where an authorisation to obtain communications data has been granted, persons within a public authority may engage in conduct relating to a postal service or telecommunication system, or to data derived from a telecommunication system, to obtain communications data.

5.3 The following types of conduct may be authorised:

- conduct to obtain communications data - including obtaining data directly or asking any person believed to be in possession of or capable of obtaining such data to obtain and disclose it; and/or
- giving of a notice – requiring a telecommunications operator to obtain and disclose the required data.

5.4 In the case of Haringey Council the obtaining of communications data will be facilitated through our membership of the National Anti-Fraud Network (NAFN), which provides a comprehensive single point of contact (SPoC) service.

5.5 It will be the responsibility of NAFN to ensure all requests to a telecommunications/ postal operator for communications data, pursuant to the granting of an authorisation, comply with the requirements of the Code of Practice.

6. Roles and responsibilities

6.1 Obtaining communications data under the Act involves five roles:

- 1) Applicant;
- 2) Approved rank officer (ARO);
- 3) Single point of contact (SPoC);
- 4) Authorising agency (OCDA);
- 5) Senior Responsible Officer in a Public Authority (SRO).

Applicant

- 6.2 The applicant is a person involved in conducting or assisting an investigation or operation within a relevant public authority who makes an application in writing or electronically to obtain communications data.
- 6.3 Any person in a public authority which is permitted to obtain communications data may be an applicant, subject to any internal controls or restrictions put in place within public authorities.

Approved rank officer (ARO)

- 6.4 The Approved Rank Officer is a person who is a manager at service level or above within the Public Authority. The ARO's role is to have an awareness of the application made by the Applicant and convey this to the SPoC.
- 6.5 The ARO does not authorise or approve any element of the application and is not required to be 'operationally independent'. The AROs for Haringey Council are identified in **Annex A**.

Single point of contact (SPoC)

- 6.6 The SPoC is an individual trained to facilitate the lawful obtaining of communications data and effective co-operation between a public authority, the Office for Communications Data Authorisations (OCDA) and telecommunications and postal operators. To become accredited an individual must complete a course of training appropriate for the role of a SPoC and have been issued the relevant SPoC unique identifier.
- 6.7 Public authorities are expected to provide SPoC coverage for all reasonably expected instances of obtaining communications data. Haringey Council is a member of the National Anti-Fraud Network (NAFN). NAFN is an accredited body for the purpose of providing data and intelligence under the IPA for all public bodies. As part of their portfolio they offer a comprehensive SPoC service.

Authorising agency (OCDA)

- 6.8 The Office for Communications Data Authorisations (OCDA) is the independent body responsible for the authorisation and assessment of all Data Communications applications under the Act. They undertake the following roles:
- Independent assessment of all Data Communications applications.
 - Authorisation of any appropriate applications.
 - Ensuring accountability of Authorities in the process and safeguarding standards.

Senior responsible officer (SRO)

6.9 The Senior Responsible Officer (SRO) is a person of a senior rank, a manager at service level or above within the Public Authority. The SRO for Haringey Council is identified in **Annex A**.

6.10 The SRO is responsible for:

- the integrity of the process in place within the public authority to obtain communications data;
- engagement with authorising officers in the Office for Communications Data Authorisations (where relevant);
- compliance with Part 3 of the Act and with the Code of Practice, including responsibility for novel or contentious cases;
- oversight of the reporting of errors to the IPC and the identification of both the cause(s) of errors and the implementation of processes to minimise repetition of errors;
- ensuring the overall quality of applications submitted to OCDA;
- engagement with the IPC's inspectors during inspections; and
- where necessary, oversight of the implementation of post-inspection action plans approved by the IPC.

7. Necessity test

7.1 Applications to obtain Communications Data should only be made where it is **necessary** for an '**applicable crime purpose**'.

7.2 This allows for applications to be made for '**entity data**' where the purpose of obtaining the data is for the **prevention and detection of crime or prevention of disorder**. This definition permits the obtaining of Entity data for 'any' crime, irrespective of seriousness or for preventing disorder.

7.3 Applications for '**events data**', previously referred to as service or traffic data, requires a higher standard, and applications for this data should only be made where the purpose is the 'prevention and detection of **serious crime**'. Serious crime is defined in Section 86(2A) of IPA 2016, and includes, but is not limited to:

- Any crime that provides the potential for a prison sentence of imprisonment for 12 months or more (Either way or indictable offences);
- Offences committed by a corporate body;
- Any offence involving, **as an integral part**, the sending of a communication OR a breach of a person's privacy.

7.4 Necessity must be demonstrated by including in every application a short explanation of:

- The event under investigation, such as a crime.
- The person whose data is sought, such as a suspect AND description of how they are linked to the event.
- The communications data sought, such as a telephone number or IP address, and how this data is related to the person and event.

7.5 The application must explain the link between the three aspects to demonstrate it is necessary to obtain communications data.

8. Proportionality test

8.1 Applications should only be made where they are proportionate, and alternative means of obtaining the information are either, exhausted, not available or considered not practical to obtain the same information.

8.2 For example, the following should be considered:

- balancing the size and scope of the proposed activity against the gravity and extent of the perceived crime or offence;
- explaining how and why the methods to be adopted will cause the least possible intrusion on the target and others;
- considering whether the activity is an appropriate use of the legislation and a reasonable way, having considered all reasonable alternatives, of obtaining the necessary result; and
- evidencing, as far as reasonably practicable, what other methods had been considered and why they were not implemented.

8.3 Applications should include the following key explanations:

- An outline of how obtaining the data will benefit the investigation. The relevance of the data being sought should be explained and anything which might undermine the application.
- The relevance of time periods requested.
- How the level of intrusion is justified against any benefit the data will give to the investigation. This should include consideration of whether less intrusive investigations could be undertaken.
- A consideration of the rights (particularly to privacy and, in relevant cases, freedom of expression) of the individual and a balancing of these rights against the benefit to the investigation.
- Any details of what collateral intrusion may occur and how the time periods requested impact on the collateral intrusion, if applicable.
- Where no collateral intrusion will occur, such as when applying for entity data, the absence of collateral intrusion should be noted.

- Any circumstances which give rise to significant collateral intrusion.
- Any possible unintended consequences. This is more likely in more complicated requests for events data or in applications for the data of those in professions with duties of confidentiality. E.G journalists/doctors/solicitors.

9. Application procedure

- 9.1 Applicants must submit applications through the central NAFN (SPoC) portal. Applicants will need to be registered with NAFN to access the portal and have valid login and security details. An allocated SPoC officer will then check all applications for legal compliance and, where necessary, provide feedback before submitting for authorisation to OCDA.
- 9.2 OCDA will independently assess each application and will either grant or refuse the authorisation.

Authorised applications

- 9.3 Where the OCDA authorises the data request, this decision is communicated to the SPoC (NAFN) and actions are taken to request the data from the relevant telecommunications providers and other agencies holding such communications data to provide the necessary data.

Refused applications

- 9.4 Where the OCDA rejects an application, the Council has three options:
- Not proceed with the application;
 - Re-submit the application with revised justification and/or revised course of conduct to obtain the communications data; or
 - Re-submit the application without alteration and seek a review of the decision by the OCDA. This may only be done where the SRO (or a person of equivalent grade) has agreed to this course of action. The OCDA will provide guidance on this process.

10. Notices in pursuance of an authorisation

- 10.1 The giving of a notice is appropriate where a telecommunications operator or postal operator can retrieve or obtain specific data, and to disclose that data, and the relevant authorisation has been granted. A notice may require a telecommunications operator or postal operator to obtain any communications data, if that data is not already in its possession.
- 10.2 For local authorities the role to issue notices to telecommunications/postal operators sits with the SPoC (NAFN), and it will be the SPoC's role to ensure notices are given in accordance with the Code of Practice.

11. Duration of authorisations

- 11.1 An authorisation becomes valid on the date the authorisation is granted by the OCDA. It remains valid for a maximum of one month. Any conduct authorised or notice served should be commenced/served within that month.
- 11.2 Any notice given under an authorisation remains in force until complied with or until the authorisation under which it was given is cancelled.
- 11.3 All authorisations should relate to a specific date(s) or period(s), including start and end dates, and these should be clearly indicated in the authorisation.
- 11.4 Where the data to be obtained or disclosed is specified as 'current', the relevant date is the date on which the authorisation was granted.
- 11.5 Please note however that where a date or period cannot be specified other than for instance; 'the last transaction' or 'the most recent use of the service', it is still permitted to request the data for that unspecifiable period.
- 11.6 Where the request relates to specific data that will or may be generated in the future, the future period is restricted to no more than one month from the date of authorisation.

12. Renewal of authorisations

- 12.1 A valid authorisation may be renewed for a period of up to one month by the grant of a further authorisation and takes effect upon the expiry of the original authorisation. This may be appropriate where there is a continuing requirement to obtain data that may be generated in the future.
- 12.2 The Applicant will need to consider whether the application for renewal remains 'necessary and proportionate' and should reflect this in any renewal application made. The Authorising body (OCDA) will need to consider this carefully in authorising any renewal.

13. Cancellation of authorisations

- 13.1 Where it comes to the Council's attention after an authorisation has been granted that it is no longer necessary or proportionate, the Council is under a duty to notify the SPoC (NAFN) immediately.
- 13.2 It is the SPoC's (NAFN) responsibility to cease the authorised action and take steps to notify the telecommunications service provider. E.g. Such a scenario may occur where a legitimate application has been made for Entity data to identify and locate a suspect, but subsequently, and before the data has been obtained the Council becomes aware by some other legitimate means of the suspects name and address etc.

14. Offences for non-compliance with IPA 2016

- 14.1 It is an offence for a person in a public authority knowingly or recklessly to obtain communications data from a telecommunications operator or postal operator without lawful authority (section 11 of IPA 2016).
- 14.2 The roles and responsibilities laid down for the Senior Responsible officer and SPoC are designed to prevent the knowing or reckless obtaining of communications by a public authority without lawful authorisation. Adherence to the requirements of the Act and this Code, including procedures detailed in this Policy, will mitigate the risk of any offence being committed.
- 14.3 An offence is not committed if the person obtaining the data can show that they acted in the reasonable belief that they had lawful authority.
- 14.4 It is not an offence to obtain communications data where it is made publicly or commercially available by a telecommunications/postal operator. In such circumstances the consent of the operator provides the lawful authority. However, public authorities should not require, or invite, any operator to disclose communications data by relying on this exemption.

15. Monitoring and record keeping

- 15.1 Applications, authorisations, copies of notices, and records of the withdrawal and cancellation of authorisations, must be retained in written or electronic form for a minimum of 3 years and ideally 5 years. A record of the date and, when appropriate, the time each notice or authorisation is granted, renewed or cancelled.
- 15.2 Records kept must be held centrally by the SPoC and be available for inspection by the Investigatory Powers Commissioner's Office upon request and retained to allow the Investigatory Powers Tribunal (IPT), to carry out its functions. The retention of documents service will be provided by NAFN.
- 15.3 The Business Manager for Corporate Governance will maintain an internal record on behalf of the SRO, and retains hard and electronic copies of all forms sent to the NAFN.
- 15.4 The documents in the internal record are retained in accordance with legal services' records management policy which complies with relevant data protection legislation. The original documents should be retained by the service area responsible for the surveillance activity.
- 15.5 The Investigatory Powers Commissioner's Office (IPCO) monitors compliance with RIPA. Haringey's SRO and Business Manager for Corporate Governance will act as the first point of contact for the Inspectors within the Council, but all service areas that use IPA should expect to be involved in any inquiries from IPCO.

- 15.6 Nothing in the Code or this policy affects similar duties under the Criminal Procedure and Investigations Act 1996 requiring material which is obtained in the course of an investigation and which may be relevant to the investigation to be recorded, retained and revealed to the prosecutor.
- 15.7 For full details of the level of information expected to be retained by the SPoC reference should be made to the Code of Practice.
- 15.8 Regular reports will be made to Members in accordance with the requirements of the IPA Codes of Practice.

16. Errors

Errors generally

- 16.1 Where any error occurs in the granting of an authorisation or because of any authorised conduct a record should be kept.
- 16.2 Where the error results in communications data being obtained or disclosed incorrectly, a report must be made to the IPC by whoever is responsible for it. ('reportable error'). E.g. The telecommunications operator must report the error if it resulted from them disclosing data not requested, whereas if the error is because the public authority provided incorrect information, they must report the error. The SRO would be the appropriate person to make the report to the IPC.
- 16.3 Where an error has occurred before data has been obtained or disclosed incorrectly, a record will be maintained by the public authority ('recordable error'). These records must be available for inspection by the IPC.
- 16.4 A non-exhaustive list of reportable and recordable errors is provided in the Code of Practice.

Serious errors

- 16.5 There may be rare occasions when communications data is wrongly obtained or disclosed and this amounts to a 'serious error'. A serious error is anything that '**caused significant prejudice or harm to the person concerned.**' It is insufficient that there has been a breach of a person's human rights.
- 16.6 In these cases, the public authority which made the error, or established that the error had been made, must report the error to the Council's Senior Responsible Officer and the IPC.
- 16.7 When an error is reported to the IPC, the IPC may inform the affected individual subject of the data disclosure, who may make a complaint to the

IPT. The IPC must be satisfied that the error is a) a serious error AND b) it is in the public interest for the individual concerned to be informed of the error.

- 16.8 Before deciding if the error is serious or not the IPC will accept submissions from the Public Authority regarding whether it is in the public interest to disclose. For instance, it may not be in the public interest to disclose if to do so would be prejudicial to the 'prevention and detection of crime'.

17. Investigations resulting in criminal proceedings

- 17.1 When communications data is been obtained during a criminal investigation that comes to trial an individual may be made aware data has been obtained.
- 17.2 If communications data is used to support the prosecution case it will appear in the 'served' material as evidence and a copy provided to the defendant.
- 17.3 Where communication data is not served but retained in unused material it is subject of the rules governing disclosure under the Criminal Procedure and Investigations Act 1996 (CPIA). The prosecution may reveal the existence of communications data to a defendant on a schedule of non-sensitive unused material, only if that data is relevant, and copies of the material may be provided to the defendant if it might reasonably be considered capable of undermining the prosecution case and/or assisting the defence.
- 17.4 Where communications data is obtained but not directly relied on to prove offences, the material may alternatively be listed in the 'Sensitive' unused material and not disclosed to the defendant. The CPIA sets out exemptions to the disclosure obligation. Under section 3(6) of that Act, data must not be disclosed if it is material which, on application by the prosecutor, the Court concludes it is not in the public interest to disclose. Any communications data which comes within the scope of this exemption cannot be disclosed. E.g. Material that reveals a 'method of investigation' is usually not disclosable.
- 17.5 If through any of the above notification processes, an individual suspects that their communications data has been wrongly obtained, the IPT provides a right of redress. An individual may make a complaint to the IPT without the individual knowing, or having to demonstrate, that any investigatory powers have been used against them.

Annex A

Haringey Council - Approved Rank Officers for IPA 2016

Job Title
Chief Executive
Director of Finance
Director of Environment and Neighbourhoods
Assistant Director for Stronger Communities

Haringey Council – Senior Responsible Officer for IPA 2016

Job Title
Assistant Director of Corporate Governance

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Report for: Cabinet – 12th November 2019

Title: **Supply of Goods and Services for Cameras Refresh, Upgrade and Network Extension – Contract Award**

Report authorised by : Stephen McDonnell, Director of Environment and Neighbourhoods

Lead Officer: Sarah Tullett, Client & Contract Manager, 020 8489 7001, Sarah.Tullett@haringey.gov.uk

Ward(s) affected: All

Report for Key/

Non Key Decision: Key Decision

1. Describe the issue under consideration

1.1 This report is seeking approval from Cabinet for the award of contract under Contract Standing Order (CSO) 9.07.1 (d) which states that all contracts valued at £500,000 (five hundred thousand pounds) or more at the time of award may only be awarded, assigned, or novated by the Cabinet . The award is of the contract for installation of CCTV in the borough, including:

- The design, supply and installation at site;
- Testing and completion of the works;
- Remedying of defects in the works.

1.2 This contract will support the Council in delivering on the refresh and upgrade of the Council's CCTV infrastructure and significantly increase the current number of cameras across the borough (increasing from 75 to estimated 150) in order to improve public confidence, detect and deter criminality as well as improve the flow of traffic across the borough.

1.3 This is a new contract to be awarded for a period of 4 years at a maximum cost of £2.1M. The contract will be funded from the allocated capital of £4.1M for the provision of CCTV across the borough. The overall capital allocation is to procure new servers, cameras, and control room as below:

- | | |
|--|--------------|
| • Digital infrastructure upgrade – servers at River Park House | £700K |
| • Cameras refresh, upgrade and extension (this contract) | £2.1M |
| • Construction - Core and shelling of 48 Station Road | £700K |
| • Fit out of the new Control Room at 48 Station Road | £600K |
| Total | £4.1M |

This is a significant investment to increase how safe and confident people who live work and play in Haringey feel.

2. Cabinet Member Introduction

- 2.1 The need to provide a new CCTV Control Room followed the decision to decant from the Ashley Road depot where the current Control Room is based. Capital provision of £2.1m was made available for this. We took the opportunity to review the scale and ambition of our CCTV operation, considering both the need and opportunities for CCTV in Haringey. Consequently the Council increased the capital allocation for this to £4.2m in February 2019.
- 2.2 We are replacing and increasing the capacity of our servers. Through this contract award we will double the size of our camera network. This report is for the award of the contract for replacement, refresh and extension of our camera network.
- 2.3 As well as increasing the number of cameras we will take advantage of latest technology, providing high quality evidential footage to support any necessary enforcement and quality real time coverage to manage incidents dynamically. We will also increase coverage to enable us to better manage the road traffic network.
- 2.4 We will increase our pool of redeployable cameras to increase the tools available to tackle crime and Anti-social behaviour (ASB) hotspots. This will increase flexibility and capacity, and having solved an issue in one location we can then lift and shift our capability to other areas.
- 2.5 This will be followed by the fit out of a modern new control room, operated jointly with Homes for Haringey and the Metropolitan Police. The new control room will bring together all the key agencies in the borough able to provide a joined up seamless response to crime and ASB as it occurs.
- 2.6 At the end of the programme we will have an expanded, modern CCTV capability joined up with partners, that enables us to provide a flexible and seamless response to incidents and issues in the borough. This will help deliver our Borough Plan commitments to create a safer borough and improving public confidence and deterring and detecting criminality.

3. Recommendations

- 3.1 For Cabinet pursuant to Contract Standing Order 9.07.1(d) to approve the award of contract for the supply of CCTV goods and services to the successful bidder named in the exempt report for a period of 4 years under a schedule of rates framework (detailed in the Contract – and Appendix A of the exempt report) up to a maximum spend of £2.1m.

4. Reasons for decision

- 4.1 The council initiated a competitive exercise through the Official Journal of the EU (OJEU) and an OJEU notice was issued on 02 August 2019, to invite tenders with submissions due on 04 September 2019. The procurement process followed the Open Procedure in accordance with Regulation 27 of the Public Contract Regulations 2015. A total of seven providers registered interest and one provider submitted a bid for the contract.
- 4.2 The tender procedure consisted of a single stage process, including 'selection questions' and six qualitative questions, assessing the bidders against the broad range of required experience, skills and capabilities as described in the specification. The submitted bid has been evaluated against price and quality to ensure that it delivers value for money.
- 4.3 The successful bidder has demonstrated its ability and capability through responses to the tender requirements and questions, and it is therefore proposed to be the successful provider.

5. Alternative options considered

- 5.1 **Doing nothing** – continue as is, repairing the existing frail infrastructure that dates back to 2006. This option was not progressed as ultimately it risks infrastructure failure and loss of CCTV capability. Risks associated with failure include loss of public and key stakeholders' confidence, increased crime and disorder, failures in traffic management and loss of related income.

6. Background information

- 6.1 Haringey's current CCTV provision supports both Community Safety in the borough and Parking Enforcement. It needs replacing and expanding to meet current and future need.
- 6.2 Our current CCTV provision is monitored at the CCTV Control Room at Ashley Road Depot. As part of the Tottenham regeneration this site was earmarked for development and there is a need for the CCTV provision to be relocated by March 2021. Suitable accommodation on 5th Floor, 48 Station Road was identified for the upgraded Control Room. We have also taken the opportunity to place new CCTV servers in our current Corporate IT Data Centre in the basement of River Park House.
- 6.3 The existing CCTV Control Room at Ashley Road Depot was built in 2006 and most of the equipment was relocated from the previous site at Woodside House in Wood Green. The majority of the equipment and systems are approaching obsolescence and maintenance is increasingly becoming a challenge.
- 6.4 This procurement also contributes to the preparation for the future relocation of the CCTV operation from Ashley Road Depot to a purpose-built CCTV control Room at 48 Station Road which will be procured separately. The new digital

infrastructure at River Park House will interphase with the new Control Room as the provision is relocated out of Ashley Road Depot.

6.4 The tender evaluation criteria and weighting were set out in the tender documents and clarified during the tendering process. The evaluation of suppliers was conducted in accordance with the following criteria:

- Price – 60%
- Quality – 40%

6.5 The funding for this contract is held within the CCTV Capital Allocation.

7. Contribution to strategic outcomes

7.1 This directly supports the Borough Plan Outcome 12: A Safer Borough Objective a): Improve community confidence and reduce fear of crime using our relationships with partners and communities as well as our physical assets including the built environment and CCTV.

7.2 This also supports the Borough Plan Outcome 10: A Cleaner, Accessible, Attractive space through the Parking Transformation Programme which includes expansion of CCTV enforcement for moving traffic.

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

8.1 Procurement

8.1.1 Procurement supports the award of this contract by Cabinet as allowed under CSO 9.07.1(d). The procurement process was carried out through an open procedure as allowed under EU procurement directive.

8.2 Finance

8.2.1 The recommendation of this report is for the appointment of a contractor to undertake the refresh and expansion of the Council's CCTV estate as well as related infrastructure such as servicers etc.

8.2.2 This is a key component of the CCTV strategy. The proposed contract value is for £2.1m for this phase of the CCTV strategy. There is currently a capital budget of £2.1m within the agreed capital programme for 2019/20 against which there has been no expenditure. In addition there is budgetary provision of £0.830m in 2020/21, £1.0m in 2021/22 and £0.2m in 2022/23.

8.2.3 The proposed contract is based on a schedule of rates arrangement. This means that the price of individual elements are known in advance as is the cost of installation/delivery etc. As such there should be minimal risk of either over or underspending.

8.3 Legal

8.3.1 The Assistant Director of Corporate Governance has been consulted in the preparation of this report.

8.3.2 The procurement of the contract which this report relates to has been conducted in accordance with the Public Contracts Regulations 2015 (as amended) and the Council's Contract Standing Orders.

8.3.3 The Assistant Director of Corporate Governance sees no legal reasons preventing Cabinet from approving the recommendations in the report.

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 proposal is to award a contract for installation of CCTV in Haringey. The proposal supports strategic objectives to detect and deter criminality, reduce fear of crime, and improve traffic flow across the borough.

8.4.4 In terms of detecting and deterring criminality, the proposal can be expected to have a positive impact on those groups that are over-represented among victims of crime. The Community Safety Strategy Equalities Impact Assessment notes that these groups include BAME residents, men, those with SEND, and younger people. Moreover, particular groups including members of minority religious and faith groups, individuals with disabilities, and individuals who identify as LGBT+ are more vulnerable to becoming victims of hate crime. The proposal can therefore be expected to have a positive impact on these groups by providing a deterrent to victimisation and supporting means of redress when instances of victimisation have occurred.

8.4.5 In terms of fear of crime, it is notable that the Haringey Residents Survey 2018 found that fear of crime in the borough is highest among those most likely to be victims of crime, and hate crime in particular. Specifically, fear of crime was found to be highest among members of minority religious and faith groups, those with disabilities, and Asian residents. The proposal is therefore likely to have a positive equalities impact to the extent that it results in a reduction in fear of crime among these groups.

- 8.4.6 In terms of traffic flow, the proposal can be expected to benefit groups who are reliant on motor vehicles, including individuals with disabilities.
- 8.4.7 As a body carrying out a public function on behalf of the Council, the contractor will be expected to comply with the Public Sector Equalities Duty in all aspects of its operations.

9. Use of Appendices

- 9.1 Appendix A of the exempt report

10. Local Government (Access to Information) Act 1985
Not applicable

Report for: Cabinet Meeting 12/11/2019

Title: North Hill Retaining Wall Improvement Works – Contract Award

Report authorised by: Stephen McDonnell - Director of Environment & Neighbourhoods

Lead Officer: Dana Rasheed, Project Manager - Environment and Neighbourhoods

Ward(s) affected: Highgate

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

1 Describe the issue under consideration

- 1.1 The proposals are to build a new retaining wall to replace the existing retaining wall that has passed its design life (built in late 1800's) and failed a structural assessment.
- 1.2 The existing mass concrete retaining wall runs along the west side of North Hill in Highgate N6, between View Road and Storey Road, and retains a narrow service road, which is public highway, providing access to private residential properties. North Hill (B519) which sits at the bottom of the retaining wall, is a two-way wide carriageway linking the A1 and Highgate. The wall is approximately 152m long and varies in height from a minimum of 0.3m to a maximum of 1.9m.
- 1.3 The retaining wall structure has passed its design life and as part of the inspection regime the North Hill retaining wall was identified as a priority for improvements following structural assessments carried out in October 2014 which highlighted the risk of collapse. As such the Council decided in 2015 to progress with the replacement of the retaining wall as a long-term solution.
- 1.4 The proposals would ensure the new retaining wall structure is compliant with the latest design standards. This includes erecting vehicle restraints on the elevated service road, refurbishing and reusing existing railings that are of historic interest, improving the width of the service road, resurfacing the service road and the main North Hill road, and adding a new brick façade to the retaining wall. All the above measures would ensure Haringey's assets are up to date and would minimise maintenance.
- 1.5 The Council's Capital Strategy and 10-year Capital Programme, which went to Cabinet in June 2016, included an allocation in relation to the repair of the North Hill retaining wall. This allocation was approved.
- 1.6 The scheme was also included in the Sustainable Transport Works Plan (STWP) 2019/20 approved at the Cabinet meeting on 18th June 2019.

- 1.7 Other funding for the North Hill Retaining Wall Improvement Works is: £20,000 from Transport for London (TfL) and £25,000 contribution from Haringey Maintenance budget for the resurfacing works.
- 1.8 This report seeks approval, under Contracting Standing Order (CSO) 9.07.01(d), for the award of the North Hill Retaining Wall Improvement Works contract, following an open tendering exercise, to Bidder 1 for a total value of £897,536.53.
- 1.9 The construction costs sum proposed to be awarded to the winning bidder does not include any scheme risk and contingency allowance. A risk and contingency budget is required to cater for unforeseen circumstances during construction, for example when working underground on unseen assets and when the works programme is impacted by issues that are out of the Council's control, like highways network incidents. The proposed risk and contingency allowance provision is stated in the exempt report at paragraph 2.
- 1.10 The above spend is within the pre-tender estimate for the works provided by Stace LLP (the appointed Cost Consultant for the project), and contained within the Highways Structure Capital Programme, with any remaining funding being utilised on other projects within the programme. The pre-tender estimate for the works is stated in the exempt report at paragraph 1.5.

2 Cabinet Member Introduction

- 2.1 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, businesses and by people from across the City and beyond either passing through or interchanging at a station or bus stop.
- 2.2 Our aim is to ensure that Haringey has a high quality, resilient highway network and a reliable public transport system that everyone can access. This year in line with our Borough Plan priorities, we are investing over £1 million into the North Hill Retaining Wall replacement project. This will ensure that the new structure will have a design life of a minimum of 120 years before it will need replacing. This will go towards improving the overall quality of our road network and encouraging walking and cycling.
- 2.3 The retaining wall structure is located adjacent to Highgate Primary School and the elevated road supported by the retaining wall is one of the main walking routes to the school.

3 Recommendations

- 3.1 It is recommended that the Cabinet:
 - I. Approves, in accordance with Contracting Standing Order 9.07.01(d), the award of a contract for the North Hill Retaining Wall Improvement Works to Bidder 1 in the sum of £897,536.53 + VAT with provision to increase this sum, as necessary, by an amount not exceeding the risk and contingency allowance set out in the exempt report at paragraph 2.
 - II. Authorises the issue of a letter of intent (LOI) for the amount of £89,753.65 + VAT (being 10% of the total contract price), as permitted under CSO 9.07.3.

4 Reasons for decision

- 4.1 Officers have undertaken a competitive tendering exercise to secure a contractor to deliver the North Hill retaining Wall Works. Through this process Bidder 1 have scored the highest and have demonstrated that they should be awarded the contract.
- 4.2 By awarding the contract to Bidder 1, the Council is securing the delivery of the North Hill retaining Wall Improvement Works. It is the Council's intention for the works to be conducted between January 2020 and October 2020.
- 4.3 The scheme is funded by Haringey Council's Capital expenditure -Highways Structures Budget. This includes all the staff costs, design and statutory undertakers' investigations which have been carried out ahead of the main works to minimise the risks. Other funding is: £20,000 from TfL LIP programme and a £25,000 contribution from Haringey's Maintenance budget for the resurfacing works.
- 4.4 The works delivered by the scheme are essential to replace the existing retaining wall structure that has passed its design life and failed a structural assessment. The works will also result in minimising maintenance costs in the long term.
- 4.5 As part of the scheme delivery, the following works will be carried out:
 - 4.5.1 erecting vehicle restraints on the elevated service road,
 - 4.5.2 refurbishing and reusing existing railings that are of historic interest,
 - 4.5.3 improving the width of the service road, replacing kerbs and resurfacing the service road,
 - 4.5.4 carriageway resurfacing of the main North Hill road for the full width along the retaining wall;
 - 4.5.5 adding a new brick façade to the retaining wall, and
 - 4.5.6 improving the layout, signing and road marking of the junction of Storey Road/North Hill Road. All of the above measures would ensure Haringey's assets are up to date and would minimise maintenance.
- 4.6 The new structure will also create a better environment for walking by widening the existing service road and will ensure vehicles using it will not overrun the footways.

5 Alternative options considered

- 5.1 Option 1- Do Nothing: Pursuing this option would fail to address the critical issue that the wall has failed the structural assessment. It would also fail to provide the improvements to this area of Haringey, especially for walking within close proximity of a primary school. This option is not recommended.
- 5.2 Option 2 - Direct Award to Term Maintenance Contractor: this option was discounted as it was the intention to stop issuing works to the current term Contract at the end of October 2019 and it was considered more cost effective to test the market by undertaking a competitive procurement process to secure the most economically advantageous tender to the Council.

6 Background information

- 6.1 The existing mass concrete retaining wall runs along the west side of North Hill, between View Road and Storey Road, and retains a service road to private residential properties.
- 6.2 North Hill lies at the bottom of the retaining wall and is a two-way carriageway with residents parking bay on the opposite side. The wall is approximately 152m long and varies in height from a minimum of 0.3m to a maximum of 1.9m.
- 6.3 A metal handrail runs along the top of the wall with 54 railing panels. The handrails are of historic interest but not listed.
- 6.4 The top service road is one-way with entrance from the south end which is the high point. There are three large trees at the back of the footpath at the south end of the side road. There is residential parking at the south end of the service road.
- 6.5 There are no records available for when the retaining wall was built except for some historic pictures from early 1900's showing the wall standing in the background.
- 6.6 In October 2014, a report was produced by Frankham Consultancy Group titled "Structural Investigation and Stability Analysis at North Hill Retaining Wall". This found that the wall had failed the structural assessment. The possible failure modes are Overturning, Failure of the Foundation Soil and Slip Failure of the surrounding Soil.
- 6.7 The highway has a zebra crossing 15m north of the retaining wall, with the maximum permitted traffic speed set at 20mph; the speed restrictions were implemented as part of a borough wide policy to reduce the speed limit on its road network. Highgate Primary School is located to the north of the existing wall on Storey Road.
- 6.8 One high-frequency bus route and a school bus route operate on this section of North Hill. The proposals to repair the retaining wall would ensure minimum disruptions to buses over the long term.
- 6.9 The Council decided in 2015 to progress the replacement of the existing retaining wall structure as a long-term solution. Project Centre Ltd was reappointed as the designer in 2015 to progress the detailed design and Stace LLP was appointed as Quantity Surveyor and cost consultant for the scheme.
- 6.10 A number of design options were examined and following extensive site investigation the current design was finalised in early 2019.
- 6.11 The scope of the proposals include:
 - Construction of a reinforced concrete retaining wall to replace an existing retaining wall structure;
 - Associated drainage, brick façade, kerbing, footway works, lighting & signing and surfacing works;
 - Removal, refurbishment and replacement of existing iron railings; and
 - Upgrade and improvement of the junction layout of Storey Road/North Hill.

Public Engagement

- 6.12 A public engagement meeting took place following this one evening in January 2019 at a nearby school. Several residents attended and the scheme was explained. A few concerns were raised, predominantly the lack of vehicular access during the works, bin collections and the safety of the Storey Road junction.
- 6.13 The concerns raised in the public engagement meeting were reviewed following the meeting and a number of measures were put in place to address them including, issuing a dispensation permit for houses with driveways during construction, keeping the bin collections unchanged and accommodating them within the works and undertaking a review of the Storey Road junction.
- 6.14 Pedestrian and emergency access to the properties will be retained at all times, however, the lack of vehicular access to the service road during construction is still a concern for a number of residents. Further public engagement meeting is planned to further explain the restraints and reason behind the council decision to stop vehicular access during construction.
- 6.15 Prior to the public meeting, a parking survey in the immediate surrounding area was undertaken to assess the parking levels. It was established that there is sufficient free parking to accommodate parking displacement during construction.

The procurement process

- 6.16 These works were procured through an EU Open Tender process using Haringey's e-Sourcing Portal, HPCS (Haringey Procurement and Contract System). The procurement process was managed by Haringey's Procurement team.
- 6.17 The Council opted for an open tender route to maximise market interest. This procedure is a transparent procurement process which allows an unlimited number of Suppliers to tender for the requirement.
- 6.18 Post tender negotiations are not admissible and as such have not been undertaken.
- 6.19 The Opportunity was advertised on the Government website, Contract Finder. At the same time the tender documents were issued by the Council on 14th August 2019 with a return requested on 30th September 2019. Haringey received tender queries and minor amendments to the contract documents were made in response to this during the tender process.
- 6.20 The agreed tender award criteria, as set out in the Instructions for Tendering document, were based on a scoring Quality/Pricing ratio of 50/50%.
- 6.21 Seven contractors submitted their Form of Tender and associated tender return documentation by the allotted time and the Most Economic Advantageous Tender was selected to be awarded the contract.
- 6.22 Following evaluation, the combined scores (price and quality) were added to provide an overall total weighted score for the tenders. Table 1 below provides a breakdown of the scores.

A summary of the scoring is below (Table 1)

Tenderer	Quality (out of 50%)	Pricing (out of 50%)	Total (100%)
Bidder 1	38.00%	50.00%	88.00%
Bidder 2	41.00%	44.06%	85.06%
Bidder 3	26.00%	36.58%	62.58%
Bidder 4	24.00%	48.52%	72.52%
Bidder 5	21.50%	45.80%	67.30%
Bidder 6	17.50%	45.34%	62.84%
Bidder 7	10.00%	35.59%	45.59%

7 Contribution to strategic outcomes

- 7.1 The scheme supports the delivery of the Borough Plan 2019-2023 Place priority. Helping to create a place with strong, resilient & connected communities where people can lead active and healthy lives in an environment that is safe, clean and green.

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

Finance

- 8.1 The Highways Structure scheme had a 2019/20 budget of £1.574m at the beginning of the financial year. At its meeting of the 10th September Cabinet agreed to re-profile this budget due to the need to undertake the works at a time that minimised disruption to the road network. The revised 2019/20 budget is £0.774m with £0.8m re-profiled into 2020/21.
- 8.2 To date the scheme has incurred £0.029m of expenditure. If the tender is accepted it is estimated that £0.2m of the contract sum will be spent this financial year along with other costs of £0.024m. This revised spend profile will be reflected in the capital programme.
- 8.3 In addition to the contract sum of £0.898m which is being recommended for acceptance, there will be additional project costs of £0.073m. A risk and contingency allowance, in the amount set out in the exempt report.

	2019/20 (£000's)	2021/22 (£000's)	Total (£000's)
Expenditure to date	29		29
Tender Sum	200	698	898
Project Management	20	40	60
Quantity Surveyor	2	6	8
Design Adviser	2	3	5
Total	253	747	1,000
Risk and Contingency allowance as set out in para. 2 of the exempt report			

Strategic Procurement dc201218

- 8.4 Strategic Procurement (SP) confirms that the procurement of the works were undertaken using a below OJEU “Open Competitive Tender” exercise.
- 8.5 Strategic Procurement approves the appointment of the award of a contract for the "North Hill Retaining Wall Improvement Works" to Bidder 1 in the sum of £897,536.53 + VAT as permitted under Contracting Standing Order (CSO) 9.07.01(d). The Strategic Procurement Team also confirms this is a fully compliant tender and represents the best value for money offer for Haringey Council.

Legal

- 8.6 Comments of the Assistant Director of Corporate Governance
- 8.6.1 The Assistant Director of Corporate Governance notes the content of this report.
- 8.6.2 The report is recommending the award of a road improvement works contract. A non-EU open tender process was carried out for the award of the contract and the most economically advantageous tender was selected as the preferred tender. This is a permitted procurement procedure under Contract Standing Orders (CSO) 9.01.1 and 9.01.2 for a contract of this value.
- 8.6.3 Pursuant to the CSO 9.07.1(d), Cabinet may approve the award of a contract if the value of the contract is £500,000 or more as is the case with the contract for award in this report.
- 8.6.4 Pursuant to CSO 9.07.3, approval may be granted for the issuance of a letter of intent for a sum not exceeding £100,000 or 10% of the total contract price pending the execution of a formal contract if it is in the best interest of the Council to do so. Although under CSOs the approval may be done by a Director, Cabinet also has power to approve the issuance of a letter of intent.
- 8.6.5 The Assistant Director of Corporate Governance sees no legal reasons preventing Cabinet from approving the recommendations in the report.

Equality

- 8.7 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.
- 8.8 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.

- 8.9 The proposal is to award a contract to build a new retaining wall to replace the existing North Hill retaining wall. The objective of these works will be to keep Haringey's assets up to date and minimise ongoing maintenance. It is noted that the works will lead to more space for pedestrians, which may have a positive impact on children and young people, individuals with disabilities who use wheelchairs, and mothers of young children who use pushchairs. No negative impact is expected on any individual or group who share the protected characteristics. The Council and the contractor will have a duty to monitor any impact and take mitigating action where necessary.

9 Use of Appendices

- 9.1 None

10 Local Government (Access to Information) Act 1985

- 10.1 No supporting documents are required to support this award.
- 10.2 This report contains exempt and non-exempt information. The exempt information is not for publication as it contains information classified as exempt under the following categories (identified in the amended Schedule 12A of the Local Government Act 1972):
- (3) Information relating to the financial or business affairs of any particular person (including the authority holding that information).

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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