NOTICE OF MEETING

CABINET

Tuesday, 8th March, 2022, 6.30 pm - George Meehan House, 294 High Road, Wood Green, N22 8JZ (watch the live meeting Here

watch the recording here)

Members: Councillors Peray Ahmet (Chair), Mike Hakata, John Bevan, Zena Brabazon, Seema Chandwani, Lucia das Neves, Julie Davies, Isidoros Diakides, Erdal Dogan and Ruth Gordon

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 26 below. New items of exempt business will be dealt with at Item 32 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 27: 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 - 14)

To confirm and sign the minutes of the meeting held on 8 February 2022 as a correct record.

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

For Cabinet to note (if any).

8. DEPUTATIONS/PETITIONS/QUESTIONS

To consider any requests received in accordance with Standing Orders.

9. HARINGEY SCHOOL TRAVEL ASSISTANCE POLICY (PAGES 15 - 178)

Report of the Director of Children's Services. To be introduced by the Cabinet Member for Early Years, Children and Families.

Cabinet approval is required to undertake public consultation on the Haringey School Travel Assistance Policy for home to school transport for children and young people with Special Educational Needs and Disabilities (SEND).

10. EARLY YEARS STRATEGY (PAGES 179 - 210)

Report of the Director of Children's Services. To be introduced by the Cabinet Member for Early Years, Children and Families.

Approval to consult on the draft Early Years Strategy with stakeholders.

11. 2021/22 FINANCE UPDATE QUARTER 3 (PAGES 211 - 264)

Report of the Director of Finance. To be introduced by the Cabinet Member for Finance and Transformation.

This report will provide an update on the Quarter 3 budget monitoring and Council's financial position. It will seek approval for any changes to the Council's revenue or capital budgets required to respond to the changing financial scenario and the delivery of the MTFS. It will also seek a decision relating to the agreement with the London Pension Fund Authority.

12. ROAD DANGER REDUCTION ACTION PLAN AND INVESTMENT PLAN FOR 2022-23 (PAGES 265 - 318)

Report of the Director of Environment and Neighbourhoods. To be introduced by the Cabinet Member for Customer Service, Welfare and the Public Realm.

To outline and seek approval for the council's road danger reduction action plan (as the local response to the Mayor of London's Vision Zero Strategy) and the associated investment across the borough in the next financial year (2022/23).

13. PARKING INVESTMENT PLAN (PAGES 319 - 332)

Report of the Director of Environment and Neighbourhoods. To be introduced by the Cabinet Member for Customer Service, Welfare and the Public Realm.

To outline and seek approval for the Council's parking schemes and programmes to be delivered across the borough in the next financial year (2022/23).

14. OUTCOME OF PUBLIC CONSULTATION FOR WOOD GREEN CONTROLLED PARKING ZONE REVIEW (PAGES 333 - 408)

Report of the Director of Environment and Neighbourhoods. To be introduced by the Cabinet Member for Customer Service, Welfare and the Public Realm.

This report details the results of the public consultation, in addition to approvals being sought on the outcome to the proposed split of the existing Wood Green Inner and Wood Green Outer Controlled Parking Zones (CPZs) into five new separate CPZ areas.

15. REPORT FROM THE LOCAL GOVERNMENT AND SOCIAL CARE OMBUDSMAN (REFERENCE NUMBER 19 020 651) (PAGES 409 - 434)

Report of the Chief Executive. To be introduced by the Cabinet Member for Health, Social Care, and Well-Being.

To consider the report of the Local Government and Social Care Ombudsman (19 020 651) and confirm the actions that the Council has taken or proposes to take, under the requirements of the Local Government Act 1974, section 31(2) (as amended).

16. REPORT FROM THE LOCAL GOVERNMENT AND SOCIAL CARE OMBUDSMAN (REFERENCE NUMBER 20 006 289) NON KEY (PAGES 435 - 448)

Report of the Chief Executive. To be introduced by the Leader.

To consider the report of the Local Government and Social Care Ombudsman (20 006 289) and confirm the actions that the Council has taken or proposes to take, under the requirements of the Local Government Act 1974, section 31(2) (as amended).

17. RECONSIDERATION OF THE PROPOSALS FOR THE DEVELOPMENT OF THE SITE OF THE FORMER CARE HOME AT 100 WOODSIDE AVENUE AND THE TERRACES AT 102 TO 108 AND 110 TO 116 WOODSIDE AVENUE. (PAGES 449 - 460)

The report of the Director for Housing, Regeneration and Planning. To be introduced by the Cabinet Member for House Building, Place - Making and Development.

The report and recommendations arise in response to report by the Local Government and Social Care Ombudsman (reference number: 20 006 289)

a) Not to acquire 104 Woodside Avenue

b) Not to consider the potential decanting of the tenanted homes belonging to the Council at 102 and 106 to 116 Woodside Avenue
c) To proceed with the development of the proposal for 100 Woodside Avenue as outlined in the planning application HGY/2021/2727 as set out in paragraph 3.2 of the report
d) That a further report will be bought back to Cabinet for final decision regarding this development in due course.

18. ADOPTION OF WALKING AND CYCLING ACTION PLAN (PAGES 461 - 692)

Report of the Director for Housing, Regeneration, and Planning. To be introduced by the Cabinet Member for Environment, Transport, and the Climate Emergency.

Reports recommends adoption of the Walking and Cycling Action Plan (WACP) following consultation on a draft WCAP from 8 November 2021 to 10 January 2022.

19. HOUSING STRATEGY CONSULTATION (PAGES 693 - 756)

Report of the Director for Housing, Regeneration, and Planning. To be introduced by the Cabinet Member for House Building, Place-Making and Development.

The report will ask Cabinet to approve a draft new Housing Strategy for Haringey and to agree to commence a consultation on this new Housing Strategy.

20. LONDON BOROUGH OF HARINGEY PROPOSED SELECTIVE PROPERTY LICENSING SCHEME (PAGES 757 - 982)

Report of the Director of Environment and Neighbourhoods. To be introduced by the Cabinet Member for Planning, Licensing, and Housing Services.

To consider the outcome of consultation and report on Selective Licensing and (subject to those considerations) seek to approve or not approve the introduction of a licensing scheme within a proposed designaton/s of the borough.

21. LETTING OF BUILD CONTRACT FOR CHOCOLATE FACTORY PHASE 1 (PAGES 983 - 1002)

Report of the Director for Housing, Regeneration, and Planning. To be introduced by the Cabinet Member for House Building, Place-Making and Development.

The report will ask Cabinet to approve the letting of a build contract in relation to the construction of affordable housing at the Chocolate Factory, N22 (Phase 1). It will also request the appropriation of the land for planning

purposes, approval to exercise powers under s203 of the Housing and Planning Act 2016, and appropriation of the land for housing purposes upon Practical Completion.

22. GOURLEY TRIANGLE: ACQUISITIONS PROGRAMME AND PRE-CONTRACT PROJECT DEVELOPMENT (PAGES 1003 - 1028)

Report of the Assistant Director for Regeneration and Economic Development and Assistant Director for Capital Projects and Property. To be introduced by the Cabinet Member for House Building, Place-Making and Development.

Approval is sought for acquisition of third-party land based on a business case and as per the boundary set out within the report. Approval is also sought to progress to pre-contract stage with extension of the existing design team contract.

23. REFURBISHMENT OF SUPPORT AND WELLBEING HUBS (PAGES 1029 - 1036)

Report of the Director of Housing, Regeneration, and Planning. To be introduced by the Cabinet Member for Planning, Licensing, and Housing Services.

To seek approval to award the contract for refurbishment of support and wellbeing hubs at Latimer House, Bigsbury Close, Hilldene Court, The Lindales, Sophia House, Lowry House, and Palace Gates.

24. REVISED COMMUNITY INFRASTRUCTURE LEVY CHARGING SCHEDULE (PAGES 1037 - 1096)

Report of the Director of Housing, Regeneration, and Planning. To be introduced by the Cabinet Member for Planning, Licensing, and Housing Services.

The report recommends approval of a Revised Community Infrastructure Levy Charging Schedule. This follows a partial review of the existing adopted Charging Schedule and a recent independent examination in that connection which found the proposed amended CIL rates to be sound.

25. MINUTES OF OTHER BODIES (PAGES 1097 - 1122)

To note the minutes of the following:

Cabinet Member Signing

4 February 2022
7 February 2022 (11.30am)
7 February 2022 (1.30pm)
10 February 2022
16 February 2022

18 February 2022
25 February 2022

26. NEW ITEMS OF URGENT BUSINESS

As per item 3.

27. EXCLUSION OF THE PRESS AND PUBLIC

Note from the Democratic Services and Scrutiny Manager

Items 28 to 32 allow for consideration of exempt information in relation to items 21, 22, 23, and 6.

TO RESOLVE

That the press and public be excluded from the remainder of the meeting as items 29 - 32 contain exempt information as defined under paragraphs 3 and 5, Part 1, Schedule 12A of the Local Government Act 1972:

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.

28. EXEMPT - LETTING OF BUILD CONTRACT FOR CHOCOLATE FACTORY PHASE 1 (PAGES 1123 - 1128)

As per item 21.

29. EXEMPT - GOURLEY TRIANGLE: ACQUISITIONS PROGRAMME AND PRE-CONTRACT PROJECT DEVELOPMENT (PAGES 1129 - 1184)

As per item 22.

30. EXEMPT - REFURBISHMENT OF SUPPORT AND WELLBEING HUBS (PAGES 1185 - 1188)

As per item 23.

31. EXEMPT - MINUTES (PAGES 1189 - 1190)

To confirm and sign the exempt minutes of the meeting held on 8 February 2022 as a correct record.

32. NEW ITEMS OF EXEMPT URGENT BUSINESS

As per item 3.

Ayshe Simsek, Democratic Services and Scrutiny Manager / Fiona Rae, Acting Committees Manager
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Fiona Alderman
Head of Legal & Governance (Monitoring Officer)
George Meehan House, 294 High Road, Wood Green, N22 8JZ

Monday, 28 February 2022

Agenda Item 6

MINUTES OF MEETING Cabinet HELD ON Tuesday, 8th February, 2022, 6.30 - 7.40 pm

PRESENT:

Councillors: Peray Ahmet (Chair), Mike Hakata, John Bevan, Zena Brabazon, Seema Chandwani, Julie Davies, Isidoros Diakides, Erdal Dogan and Ruth Gordon

ALSO ATTENDING VIRTUALLY: Cllr Gunes, Cllr Connor, Cllr Dennison

723. FILMING AT MEETINGS

The Chair referred to the information as set out in the agenda and advised that the meeting was being filmed.

724. APOLOGIES

Apologies for absence were received from Councillor Lucia das Neves.

725. URGENT BUSINESS

There were no items of urgent business.

726. DECLARATIONS OF INTEREST

Councillor Erdal Dogan declared a personal interest in relation to item 9, Scrutiny Panel Review on Haringey Family of Schools, as he had been the Chair of the Children and Young People's Scrutiny Panel between 2020-21 when the review had commenced.

Councillor Seema Chandwani declared an interest in relation to item 11, To Award a Leasehold Building Insurance Contract, as she was a Homes for Haringey leaseholder. She confirmed that she. would not take part in the discussion and voting on this item and would leave the room for the duration of the item.

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

No representations were received.

728. MINUTES

RESOLVED

That the minutes of the Cabinet meeting held on 18 January 2022 be approved as a correct record.

729. DEPUTATIONS/PETITIONS/QUESTIONS

No deputations, petitions, or questions were received.

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

The Chair advised that the budget scrutiny recommendations would be considered as part of item 10 and the scrutiny report on Haringey Family of schools would be considered as part of item 9.

731. SCRUTINY PANEL REVIEW ON HARINGEY FAMILY OF SCHOOLS

Cllr Gunes, Chair of the Children and Young People's Scrutiny Panel introduced the Scrutiny Review on Haringey Family of Schools, thanking fellow Panel members and Co-opted members for their support and participation in the review.

She outlined that there were now a far greater variety of schools than previously, with a number of new types being established in recent years. The resulting fragmentation presented challenges for local authorities, which included ensuring that all schools were providing a good standard of education and planning and co-ordinating the provision of school places. Schools were also now subject to varying degrees of local democratic control and the capacity of local authorities to influence them had been diminished.

The Chair of the Children and Young People's Scrutiny Panel referred to the demand for primary school places, which had reduced, and there was currently a significant surplus of reception places in Haringey. This had serious budgetary implications for many primary schools due to the way in which schools were funded. The drop in demand for places would feed through to secondary schools in due course. Demand for school places was subject to fluctuation though and there would be a need for sufficient places to be available to accommodate any future increases in demand for places.

The review report had looked at how the Council could respond most effectively and strategically to these issues and made a number of recommendations.

The Chair of the Children and Young People's Scrutiny Panel continued to present the recommendations as set out in pages 4 to 7 of Appendix 3.

The Leader invited questions on the Scrutiny Review report.

There were questions from Cllr Bevan on the lessons learnt from the school learning event on exclusions, and when the follow up event would take place. It was noted that there was a learning event, last night, on exclusions with a further event planned for the summer considering inclusion in the borough.

It was noted a framework of support had been put in place to help schools at a much earlier stage when the pupil's needs become apparent. There was particular focus in the framework on primary schools and the boundaries that are put in place during a school day. The AD for Schools and Learning offered to provide more details to the Cabinet Member for Housing, Licensing and Planning outside of the meeting.

Councillor Brabazon, Cabinet Member for Children, Families and Early Years welcomed the report and the discussion on school structures. She set out the Cabinet response to the scrutiny recommendations, highlighting the following:

- That all of the recommendations were agreed or partially agreed.
- The areas explored in the review concerning: admissions, finance, school numbers, SEND and academisation were significant issues in their own right for schools.
- Paragraph 6.11 highlighted that the Department of Education had carried out a consultation on the school improvement and brokering gran. This was resulting in £250k being removed from the budget for supporting school improvement. The Council would be working with schools to manage and contain this decrease in funding to provide the support needed in 2022/23.
- Grateful to the Scrutiny Panel for inviting people to speak and provide evidence on this subject of schools. It was important for the Council to maintain relationships with the Church diocese as it continues to consider school numbers and planning places together with the support needed to a variety of schools.

- The Cabinet Member added that she had attended the learning event on exclusions, referred to by the AD for Schools and Learning , and she commented on the good progress made in support , positively impacting on the most vulnerable students as exclusion numbers had reduced. It was noted that the Haringey Education Department [HEP] was working well on early intervention programmes and offering alternative placements for a while and then allowing children& young people to go back into their mainstream school. This successful approach was being developed further, in the next couple of the months.

In response to questions from Cllr Gordon, Cllr Chandwani, and the Leader of the Council, the following information was provided.

- With regards to the action, being taken on absenteeism and where children/young people were frightened to come back because of issues from the pandemic, attendance was recorded, monitored and discussed each week. During the pandemic schools were contacting families that they were most concerned about on a daily basis to assess how they were doing.

- The AD for Schools and Learning provided information on the Council's statutory requirement, through the Schools Welfare team, to pursue non-attendance. This team dealt with intransigence issues and was making sure children and young people were enrolled and getting to school. However, there was work done with schools, well before, Welfare services became involved to support schools to improve attendance of some pupils.

- The Council could identify attendance issues through their daily monitoring activities which included considering data to understand if was a pattern of absences developing or where they identified that the absences were going above a certain level. The AD for Schools and Learning was happy to provide more detail outside of the meeting.

- Responding to the question on the support for BAME children who were under achieving but not at risk of exclusion, there was work being completed by the BAME achievement group and it was noted that Black Afro Caribbean student's attainment at Commerce House had significantly improved.

- The Cabinet Member noted that there was good improvements across the borough on attainment and it was important to celebrate all successes in attainment and not just in GCSE and A level exams. There was an online Saturday academy, which had over 80registered pupils. This was a supplementary school for year 7 and year 4 to help improve attainment.

- The Director for Children's Services outlined that there was a high focus by teachers and schools on a framework and contained strategies for narrowing the attainment gap for BAME students.

- It was noted that , the curriculum was reviewed and updated to be culturally appropriate. Examinations would be likely reinstated nationally and would help further measure progress in attainment. There was focus on all BAME group and this included support for parents to help their children with attainment.

- There was a question on how the Council focus on support to different ethnicity groups given the way the data was collated. A big minority of BAME groups such as Turkish and Kurdish pupils could be hidden under 'white other' in schools data. It was noted that the Council did have data on the BAME ethnic groups; it was collected locally, and provided a focus for the Schools service. It was noted that this data could be collected at every level. The Council could analyse and extrapolate this data to gain a constant understanding of how different BAME cohorts were performing. This data was also used with school improvement partners to challenge schools around outcomes and underpinned part of the BAME pledge programme. This helped ensure outcomes for BAME children and young people as good as can be.

RESOLVED

1. To consider the report and recommendations of the Scrutiny Committee attached at Appendix 1 and Appendix 3.

2. To agree the response to these recommendations attached at Appendix 2 to the report.

Reasons for decision

On 29 November 2021, the Overview and Scrutiny Committee met to approve the recommendations of the scrutiny review of the Haringey Family of Schools.

In its work, which contributed to the report, the Children and Young People's Scrutiny Panel held several evidence gathering sessions and took evidence from Council officers and key stakeholders. The CYP Scrutiny Panel then made several recommendations, which were adopted by the Overview and Scrutiny Committee at its meeting on 29 November 2021.

Alternative options considered

None.

732. 2022/23 BUDGET AND 2022-2027 MEDIUM TERM FINANCIAL STRATEGY REPORT

The Cabinet Member for Finance and Transformation introduced the report, which finalised the Council's General Fund and HRA 2022/23 Budgets and Medium-Term Financial Strategies for 2022-2027.

It was noted that the only items not confirmed at this stage were:

- Notification of final levy sums however, the Council were not forecasting any levies to be significantly different to the sums currently budgeted for;
- Confirmation of the GLA council tax element;
- The implications of the Final 2020/21 Local Government Finance Settlement announcement and any other late notifications from government departments – there were no indications that this would bring forward any / material changes to the provisional figures already received.

The report outlined that these final notifications were not expected to lead to any significant budget implications, but an update would be included in the Full Council report on 1st March; this would also include details of any final budget adjustments required.

The Cabinet Member advised that the budget was well received and the consultation dialogue had been genuinely constructive with no hidden issues.

There was praise for the Finance Team and other officers for compiling the report and producing good budget proposals. The Cabinet Member continued that this was the first budget that balanced without savings and allowed for substantial levels of investment in revenue and capital whilst maintaining a fiduciary approach.

The Cabinet Member continued to refer to alignment of the budget to the administration's future manifesto and political priorities. This included:

- increase in council housing,
- helping the most vulnerable,
- support to the social care budget which in the past had been chronically underfunded,
- maintained commitment to the green agenda,

- support to parks, active travel,
- investment in preventing antisocial behaviour,
- significant increase in budget allocation for the prevention of violence against women and young girls , and
- investment in public participation, co- design and co-production.

The Cabinet Member also highlighted the following:

- A Council Tax rise by 1.99% for the general Council services, plus a further 1% social care precept, which added up to a total of 2.99%, (i.e. lower than the anticipated rate of inflation). In practice, this would mean that the increase for a Band D property (excluding the GLA element) would be 83 pence per household per week,
- Continuing with a comprehensive Council Tax Reduction Scheme which meant that over 16,000 residents would pay no Council Tax at all;
- Recognition that even this modest council-tax increase, at this challenging time, would be an additional ask for some. However, it was felt that without these resources, the Council would have to cut back support and services for the most vulnerable in the borough and therefore felt appropriate to put forward.

In conclusion, the Cabinet Member was proud to recommend this budget for Cabinet and onward full Council approval.

Councillor Pippa Connor, Vice Chair of the Overview and Scrutiny Committee and Chair of the budget scrutiny meetings presented the Overview and Scrutiny recommendations set out at appendix 9 of the report.

She thanked Finance officers and scrutiny officers for facilitating the process, also praising co-opted members for helping members maintain their community focus of what scrutiny were trying to achieve in the budget recommendations.

The Vice Chair of Scrutiny spoke about the format of the papers for budget Scrutiny Panel meetings and, for future years asked that, these reports were made more accessible to the public as it was helpful to ensure that these are as clearly presented as possible.

She asked that each of the four Scrutiny Panels have their own budget specific papers for their respective revenue and budget areas.

The Vice Chair for Overview and Scrutiny continued to refer to the recommendations set out at Appendix 9 - pages 191 to 231.

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

- With regards to the contention that the budget assumed a structural gap of £65m over the next term of the administration and would involve budget cuts of this sum, the Cabinet Member underlined that there would be no cuts to the budget. The Director for Finance further responded that the report made clear there was a balanced budget for next financial period, a pre-requisite for the

budget to be considered at full Council on the 1st of March. The Director further explained that as the MTFS moved forward in year two, and onwards, there was a significant budget gap identified in the report. However, this was now around 50% less for 2023/24 than assumed for and reported in the draft MTFS report considered in December 2021. This helped make the closing of this budget gap more accessible over this coming year.

- The ambition for the forthcoming period was to consider efficiency improvements and opportunities to fulfil the roles of the Council at a lower total cost.

- The Director of Finance continued to outline that the long-term challenge for the budget had not changed for a number of years. This report was consistent with information provided in the February 2021 reports but there were a number of factors being considered that might change the long-term budget positions in a positive way. This included potential re-establishing of the funding base for Local Authorities under the Government's levelling up scheme and the council were waiting to find out how this will affect the longer-term funding position. This was hoped to be better known in the course of this year and would help consideration of the approach that the Council will take for year three, when the budget gap is expected to widen. The Council would also use this coming longer financial period in year one and year two, to develop the change and transformation agenda to also mitigate the budget gap which if continued at the scale described would require the Council to do things differently.

- In response to Cllr Connor's request from Scrutiny to consider the risk of additional costs to cover increased future borrowing, the Cabinet Member advised that Overview & Scrutiny Committee had put forward constructive recommendations and the responses were set out in Appendix 9. The Finance Team would continue to work on considering and accommodating them as much as possible. Overall, the long financial strategy calculations took into account projected loan charges and revenue costs.

- In response to the question that there was a reduction in the Place budget area of £3.7m, it was clarified that there were no new cuts involved to this budget area. There were budgetary changes between December 2021 and February 2022 in the Place budget that looked like the budget had been reduced but this was to do with the budget forecast revised estimates concerning the concessionary fare charges and other areas outlined at paragraph 1.3.

- The Director of Finance advised that the revised budget forecast areas listed in paragraph 1.3 and 1.4 would primarily fund budget growth in the social care services area. The Cabinet Member concurred and highlighted the potential accumulative positive impact of invest to save schemes on the budget.

RESOLVED

1. To consider the outcome of the budget consultation as set out in Appendix 8, to be included in the report to Council. Having taken this into account this report does not propose any amendment to the Budget for 2022/23 nor to the MTFS 2022/27.

2. To approve the responses made to the Overview and Scrutiny Committee recommendations following their consideration of the draft budget proposals as set out in Appendix 9. Having taken this into account this report does not propose any amendment to the Budget for 2022/23 nor to the MTFS 2022/27.

3. To propose approval to the Council of the 2022/23 Budget and MTFS 2022/27 Budget Proposals as set out in Appendix 2.

4. To propose approval to the Council of the 2022/23 General Fund Revenue Budget as set out in Appendix 1, including specifically a General Fund budget requirement of £262.923m, but subject to final decisions of the levying and precepting bodies and the final local government finance Settlement.

5. To propose approval to the Council of the General Fund Medium Term Financial Strategy (MTFS) 2022-2027 as set out in Appendix 1.

6. To propose approval to the Council that the overall Haringey element of Council Tax to be set by London Borough of Haringey for 2022/23 will be £1,484.13 per Band D property, which represents a 1.99% increase on the 2022/23 Haringey element and with an additional 1% for the Adult Social Care Precept amount.

7. To note the Council Tax Base of the London Borough of Haringey, as agreed by the Section 151 Officer under delegated authority (Article 4.01(b), Part 2, of the Constitution), as 79,303 for the financial year 2022/23.

8. To propose approval to the Council of the 2022/23 Housing Revenue Account budget as set out in Table 9.4.

9. To propose approval to the Council of the Housing Revenue Account Medium Term Financial Strategy (MTFS) 2022-2027 as set out in Table 9.4.

10. To approve the changes to the rent levels for residents in temporary accommodation, Council tenants in General Needs and Sheltered/Supported homes reflecting the recent rent guideline requiring Councils in England to increase rent by no more than the Consumer Price Index (CPI) at September of the previous year plus 1%. This will increase the average weekly rents as set out in Tables 9.1 and 9.2.

11. To agree the changes to service charges to tenants as set out in Table 9.3.

12. To propose approval to the Council of the 2022/23 – 2026/27 General Fund capital programme detailed in Appendix 4.

13. To propose approval to the Council of the 2022/23 – 2026/27 Housing Revenue Account (HRA) capital programme detailed in Table 9.5.

14. To propose approval to the Council of the Capital Strategy detailed in Section 8 of this report.

15. To propose approval to Council of the strategy on the use of flexible capital receipts to facilitate the delivery of efficiency savings including capitalisation of redundancy costs (Appendix 6).

16. To propose to the Council the Dedicated Schools Budget (DSB) allocations for 2022/23 of £282.282m as set out in Appendix 7.

17. To note the funding to be distributed to primary and secondary schools for 2022/23 based on the figures advised to Schools Forum and submitted to the Education Funding Agency in January 2022 set out in Section 10.

18. To note the budgets (including the use of brought forward DSG) for the Schools Block, Central Services Block, High Needs Block and Early Years Block as per Appendix 7.

19. To delegate to the Director of Children Services, in consultation with the Cabinet Member for Children, Education and Families, the power to amend the Delegated Schools Budget to take account of any changes to Haringey's total schools funding allocation by the Education and Skills Funding Agency.

20. To delegate to the Section 151 officer, in consultation with the Cabinet Member for Finance, the power to make further changes to the 2022/23 budget proposals to Full Council up to a maximum limit of £1.0m.

Reasons for decision

The Council has a statutory requirement to set a balanced budget for 2022/23 and this report forms a key part of the budget setting process by setting out the forecast funding and expenditure for that year. Additionally, in order to ensure the Council's finances for the medium term are maintained on a sound basis, this report also sets out the funding and expenditure assumptions for the following four years in the form of a Medium Term Financial Strategy.

Alternative options considered

The Cabinet must consider how to deliver a balanced 2022/23 Budget and sustainable MTFS over the five-year period 2022/27, to be reviewed and ultimately adopted at the meeting of Full Council on 1st March 2022.

Clearly there are options available to achieve a balanced budget and the Council has developed the proposals contained in this report after determining levels of both income and service provision. These take account of the Council's priorities, the extent of the estimated funding shortfall, the estimated impact of wider environmental factors such as the Covid-19 pandemic and the Council's overall financial position.

These final proposals now presented take into consideration the funding allocations announced in the Provisional Local Government Finance Settlement, the responses to the consultation and the Overview & Scrutiny process.

733. COUNCIL'S CORPORATE INSURANCE ARRANGEMENTS

The Cabinet Member for Finance and Transformation introduced the report which sought approval to award the contract for insurance arrangements to successful tenderer(s) for the following: Property, Combined Liability, and Terrorism.

Following consideration of the exempt information, it was

RESOLVED

In accordance with Contract Standing Order (CSO) 9.07.1(d), to approve the award of the contracts for the provision of the Insurance Services via the Insurance London Consortium (ILC), effective from 1 April 2022, for a period of five years with a break clause at the end of year three and year four to the following providers: Property Insurance Services (Lot 1) to Insurer 1 (identified in Appendix A to the report), Terrorism Insurance Services (Lot 2) to Insurer 1 (identified in Appendix A to the report), and Liability Insurance Services (Lot 3) to Insurer 3 (identified in Appendix A to the report).

Reasons for decision

The current insurance contracts commenced on 1 April 2017 and were based on a three year agreement with an option to extend by a further two years. The extension period will end on 31 March 2022. It is necessary to ensure that the new contracts are in place from 1 April 2022, to avoid any gap in insurance cover for the Council.

Alternative options considered

Purchasing stand-alone cover for the Council, using agreed procurement processes. This was not considered appropriate because:

- Haringey Council's membership of the ILC has enabled it to benefit from significant economies of scale in procuring policies for a number of local authorities; these economies of scale would not be available if the Council were to opt for a single authority procurement route.
- Membership of the ILC has also allowed the Council to share best practice on insurance and risk management practices, which would not be available on a stand-alone basis; and
- The insurance market for local authority risks has historically had a limited number of competitors. Procuring through the ILC has previously increased the number of providers willing to respond and resulted in lower premiums.

734. TO AWARD A LEASEHOLD BUILDING INSURANCE CONTRACT

At this point in the meeting, Cllr Chandwani left the room.

The Cabinet Member for Finance and Transformation introduced the report which sought approval to award a contract for the provision of the Leaseholders' Building Insurance Service from 1 April 2022 for a period of five years with a break clause at the end of year three and year four.

Following consideration of the exempt information, it was

RESOLVED

In accordance with Contract Standing Order 9.07.1(d), to approve the award of the contract for the provision of the Leaseholder Building Insurance Service from 1 April 2022 for a period of five years with a break clause at the end of year three and year four to Insurer 1 (identified in Appendix A to the report).

Reasons for decision

The current insurance contract commenced on 1 April 2017 and was based on a 3-year agreement, with an option to extend by a further 2 years, expiring on 31st March 2022. It is necessary to ensure that the new contract is in place from 1 April 2022, to avoid any gap in insurance cover for the Council and leaseholders.

Alternative options considered

The Council as the freeholder of the property it owns is required to put appropriate insurance arrangements in place. Procurement of stand-alone cover for leaseholder insurance was carried out via Open tender process.

Historically, leaseholder insurance tender was run utilising the Crown Commercial Services framework (Pro 5 Insurance Framework) but this resulted in reduced competition compared to tenders in recent years. As a result, for this tender, the Council decided to use the Open tender process.

Cllr Chandwani did not take part in the discussion or voting on this item and re-entered the room at the end of the item.

735. APPROVAL FOR HARINGEY TO WITHDRAW FROM THE LONDON HOUSING CONSORTIUM JOINT COMMITTEE

The Cabinet Member for Planning, Housing, and Licensing Services introduced the report which sough Cabinet approval for Haringey to withdraw from the London Housing Consortium (LHC) Joint Committee and, in the case of its disbandment, to agree to consider at a future meeting options for the Council's continued participation in a new LHC corporate entity.

RESOLVED

1. To agree that Haringey, as one of the ten Constituent Authorities of the London Housing Consortium (LHC) Joint Committee, withdraws from the LHC Joint Committee, resulting in its potential disbandment in December 2022 at the earliest.

2. That Haringey notifies LHC of this decision by 25th February 2022 at the latest.

3. To agree that Haringey will consider at a future meeting, the options for continued participation in the new LHC corporate entity when the options are known.

Reasons for decision

Recommendation 3.1 takes forward the decision reached by all 10 constituent boroughs, including Haringey, on the 3rd of December that the Joint Committee be disbanded and a new corporate entity explored.

Members of the LHC Joint Committee recognised that the dynamic nature of LHC as a commercial enterprise is also at odds with the democratic and regulatory processes that are required by local authorities. It is felt that LHC would benefit from having more autonomy around:

- Governance and organisational design
- Job design and reward
- Future provision of pension
- Financial modelling and risk management.

Recommendation 3.3 indicates that LHC would encourage current Constituent Authorities to consider participation in the new corporate entity. LHC officers indicated there would still be potential, with this decision to explore partnership related working with neighbouring boroughs and maintain the principle of collaborative working.

Alternative options considered

To continue as a Joint Committee which would require two or more Constituent Authorities with one of them acting as lead authority. This was not considered as Haringey voted to withdraw from the Joint Committee and new corporate entity be explored.

Please note in the unlikely event Hillingdon decides not to withdraw, the Joint Committee will continue (provided that at least one other Constituent Authority also decides not to withdraw).

736. MINUTES OF OTHER BODIES

RESOLVED

To note the minutes of other bodies.

737. SIGNIFICANT AND DELEGATED ACTIONS

RESOLVED

To note the significant and delegated actions.

738. NEW ITEMS OF URGENT BUSINESS

There were no new items of urgent business.

739. EXCLUSION OF THE PRESS AND PUBLIC

RESOLVED

That the press and public be excluded from the meeting for the consideration of agenda items 18-21 as they contained exempt information as defined in Section 100a of the Local Government Act 1972; Paragraph 3 – information relating to the financial or business affairs of any particular person (including the authority holding that information; Paragraph 5 – information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.

740. EXEMPT - COUNCIL'S CORPORATE INSURANCE ARRANGEMENTS

The Cabinet noted the exempt information and resolutions as per minute 733.

741. EXEMPT - TO AWARD A LEASEHOLD BUILDING INSURANCE CONTRACT

At this point in the meeting, Cllr Chandwani left the room.

The Cabinet noted the exempt information and resolutions as per minute 734.

Cllr Chandwani did not take part in the discussion or voting on this item and re-entered the room at the end of the item.

742. EXEMPT - MINUTES

RESOLVED

That the exempt minutes of the Cabinet meeting held on 18 January 2022 be approved as a correct record.

743. NEW ITEMS OF EXEMPT URGENT BUSINESS

There were no new items of exempt urgent business.

CHAIR: Councillor Peray Ahmet

Signed by Chair ……..

Date ……

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Report for: Cabinet – 8 March 2022

Title: Haringey School Travel Assistance Policy

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

Lead Officer: Jackie Difolco, Assistant Director Early Help, Prevention and SEND, and Mary Jarrett, Head of Service SEND Services

Ward(s) affected: All

Report for Key/ Non Key Decision: Key Decision

1. Describe the issue under consideration

1.1 This paper reports on the proposed changes made to the current Spencial Educational Needs (SEN) Transport Policy now proposed to be renamed the Travel Assistance Policy and seeks Cabinet approval for public consultation on the proposed changes. Following consultation, a final draft of the policy will be submitted to Cabinet for approval prior to implementation.

2. Cabinet Member Introduction

2.1 I am pleased to introduce this report which is the result of a detailed policy review. Haringey Council has a statutory duty to deliver home-school transport for children and young people up to 16 years, post 16 years and adults learners in accordance with the Education Act 1996. The current policy is in need of updating to provide clarity on a range of areas including eligibility, procedures with the development of a new policy focusing soley on people requirting travel assistance who are aged 16 and over.

2.2 The policy review comprised of a small stakeholder group including officers from the SEND team, representatives from Special School Headteachers and a representative from the Haringey Parent Carers Forum. This has informed the updated draft and new policies attached as appendices. This report asks colleauges to approve public consultation of the two policies which will enable wider stakeholder feedback and input into the final policies for implementation.

3. Recommendations

Cabinet is asked:

3.1 To approve a consultation on the proposed changes to the Haringey Travel Policy (2018-2020) (Appendix 5) now proposed to be referred to as School Travel Assistance Policy, Children & Young People up to 16 years of Age (Appendix 2) and Post-16 School Travel Assistance Policy (Appendix 3). The consultation to be for a period of 12 weeks from 9 May 2021 to 31 July 2022.

3.2 To note that a report on the outcome of the consultation be brought back to Cabinet for a final decision on the proposed policy changes.

4. Reasons for decision

4.1 Local processes must have due regard to The Home to School Travel and Transport Statutory Guidance for Local Authorities July 2014 and Post 16 Transport and Travel Support to Education and Training Statutory Guidance 2019. Under the Act and the Guidance, the Council must consult widely with interested parties on any proposed changes to their home to school travel arrangements policy statements for children, young people and adult learners.

4.2 A key change is that the current School Travel Policy title has been amended to the 'School Travel Assistance Policy (Children & Young People up to 16 years of Age)' and 'Post-16 School Travel Assistance Policy'.

4.3 The main changes to the current policy are as follows:

a) consideration of sustainability, focusing on the environment, emissions reduction, and promotion of indepent travel options.
b) creating a specific policy for young people aged 16-25, including information about external travel support.
c) introduction of behavioural standards for children and young people using transport commissioned by the Local Authority.
d) detaled explanation of the transport decision making process.
e) standardisation of disputes and appeals process in accordance with statutory guidance.
f) clarification regarding 'personal travel budgets' and how they are calculated.
g) comprehensive application procedure and guidance.
h) clarity around breakfast/ after school clubs and times when Haringey Council will provide transport.
i) cut off deadlines for applications with exceptional circumstances included
j) COVID-19 information in relation to home-school transport.

4.4 These policy changes will need to be subject to full public consultation via an on-line consultation form published on the Haringey SEND Local Offer web-site for a period of 12 weeks to ensure that families, schools and other parties have sufficient time to respond to the proposed changes.

4.5 The consultation will be promoted via the SEND Newsletter, Special Schools and Parent Carers Forum and ar range of other relevant networks within the education, health and care sector.

5. Alternative options considered

Not applicable.

6. Background information

6.1 The current policy (Appendix 5) has been subject to internal review and external scrutiny and has been updated to take into consideration work undertaken via the SEN Transport Learning review (Autumn 2021), feedback from parents and carers via the SEND Home-School transport questionnaire and feedback received during the academic year 2020-21 regarding the Home School Transport Service.

6.2 To inform the refreshed policy for consultation, a stakeholder group including representatives from Special School Headteachers, Transport Staff and a representative from the Haringey Parent Carers Forum came together to review the current policy and make suggestions for proposed changes.

6.3 Haringey Council began a review of home-school transport arrangements in 2019 with a series of public meetings and review led by the, then Assistant Director for Early Help Prevention and SEND. The focus of the review were the dissatisfaction of SEND parents in relation to the following:

a) Lack of clarity and flexibility within the policy.
b) Lack of involvement of parents with decisions made in relation to their child's transport
c) Lack of a clearly described dispute resolution process for Home School Transport.

6.4 The review was suspended during the coronavirus pandemic as home-school transport services were reconfigured during periods of school closure and lockdown.

6.5 Service improvement work in relation to provision of home-school transport continued throughout the pandemic with the introduction of new software to support the service and a staffing review. In 2021, the Council in-sourced the Transport Buddies service (who support young people by training them to travel to school and post 16 provision independently).

6.6 Subsequently, following an escalation of concerns regarding disruption to home-school transport in September 2021, the current Assistant Director for Early Help, Prevention and SEND chaired a learning review of home-school transport arrangements with key stakeholders including schools, parents, carer representatves, governors, transport providers and council officers from Procurement and the SEN Transport Team. The learning review identified a series of recommendations regarding operational and strategic service improvement including the following:

a) revision and up-dating of the Travel policy with clarity given to the transport issues for those under statutory school age and those aed 16+.
b) consideration of a revision of policy to 'Transport Assistance Policy'
c) commissioning of transport providers for 3-5 years to create stability and sustainability.

6.7 The two policies have resulted from this improvement work and are designed to clarify the duties of the council, the responsibilities of schools and families and to create a fair, open and transparent set of criteria and expectations regarding the provision of home-school transport. (Refer to Appendix Two: Haringey Travel Assistance Policy 5 – 16 and Appendix Three: Haringey Travel Assistance Policy 16+)

6.8 Proposed questions for consultation have been drafted. (Refer to Appendix Four: Proposed Consultation Questions).

7. Contribution to strategic outcomes

7.1 The objectives of the Assisted Travel polices are aligned with the priorities within Haringey's Early Help Strategy and the 'Borough Plan – Priority 2 (People)' specifically:

- 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
- Every young person, whatever their background, has a pathway to success for the future
- All adults are able to live healthy and fulfilling lives, with dignity, staying active and connected in their communities

7.2 Haringey has published a Draft Walking and Cycling Action Plan (WCAP) for consultation to cover the years 2021- 2031 which closed on the 10 January. Two key aspirations within the WCAP are two promote walking and cycling as natural choices and to improve the wellbeing of residents. The Assisted Travel policies will contribute to these outcomes by promoting both walking and cycling as beneficial independent travel choices for children and young people who no longer require support and able to travel to their place of learning independently.

8. Statutory Officers Comments (Director of Finance (procurement), Head of Legal and Governance, Equalities)

Finance

The recommendation to commence consultation will not give rise to any financial implications. Any future decisions arising as a result of the consultation will be considered as they arise. The authority currently has a budget of £4556,420 for travel assistance, which has been under pressure. The cost implications of the proposals subject to consultation here will not be clear until the policy is decided after this process and it is implemented. However, it is expected to not cost more than the existing arrangements.

Procurement

Strategic Procurement notes the contents of this report and confirms there are no procurement related matters that would prevent the Council agreeing the recommendations stated in this report.

Legal

Under Section 508B of the Education Act 1996 (the Act) *(travel arrangements for eligible children)* local authorities must provide free school transport to facilitate attendance at school for the following categories of eligible children of compulsory school age (5-16) in the authority's area; children whose nearest suitable school is: beyond 2 miles (if below the age of 8); or beyond 3 miles (if aged between 8 and 16); children that cannot reasonably be expected to walk to school because of their mobility problems or because of associated health and safety issues related to their special educational needs (SEN) or disability; children who cannot reasonably be expected to walk to nearest suitable school because the nature of the route is deemed unsafe to walk; children entitled to free school meals or their parents are in receipt of maximum Working Tax Credit etc.

Under Section 508C of the Act *(travel arrangements etc for other children)* local authorities have discretionary powers to provide transport for children who are not eligible to free transport.

Section 509A of the Act *(travel arrangements for children receiving early years education otherwise than at school)* confers on local authorities a discretionary power to provide a child with assistance with school transport. The authority must be satisfied that, without such assistance, a child would be prevented from attending at any premises which are not a school or part of a school but at which relevant early years education is provided, for the purposes of receiving early years education there.

Under Section 508D of the Act, local authorities must have regard to the Secretary of State's guidance. The Home to School Travel and Transport Statutory Guidance for Local Authorities July 2014 provides that

"51 Publication of general arrangements and policies Local authorities must publish general arrangements and policies in respect of home to school travel and transport for children of compulsory school age. This information should be clear, easy to understand and provide full information on the travel and transport arrangements. It should explain both statutory transport provision, and that provided on a discretionary basis. It should also set out clearly how parents can hold local authorities to account through their appeals processes. Local authorities should ideally integrate their Sustainable Modes of School Travel strategies into these policy statements, and publish them together.

Policy Changes
52. Local authorities should consult widely on any proposed changes to their local policies on school travel arrangements with all interested parties. Consultations should last for at least 28 working days during term time. This period should be extended to take account of any school holidays that may occur during the period of consultation.

53. Good practice suggests that the introduction of any such changes should be phased-in so that children who start under one set of transport arrangements continue to benefit from them until they either conclude their education at that school or choose to move to another school. Parents make school choices based on, amongst other things, the home to school transport arrangements for a particular school, and any changes might impact adversely on individual family budgets.

Under section 508F *(provision of transport etc. for adult learners)*, local authorities are required to make such arrangements for the provision of transport as they consider necessary in respect of: (a) adults (i.e. those who are aged 19 or over) for the purpose of facilitating their attendance at local authority maintained or assisted further or higher education institutions or institutions within the further education sector; and (b) relevant young adults with an EHC plan (which can only be maintained up until the age of 25) for the purpose of facilitating their attendance at institutions where they are receiving education or training outside the further and higher education sectors. Where the local authority makes such arrangements, any transport provided must be free of charge. Where the local authority decides not to provide transport arrangements in a particular case, they still have discretion to pay all or part of the reasonable travelling expenses for the student.

Under Section 508G *(transport policy statements etc. for young adults subject to learning difficulty assessment)* local authorities making arrangements, or proposing to pay travelling expenses, under section 508F in relation to relevant young adults must consult: (a) any other local authority that they consider it appropriate to consult; (b) governing bodies of institutions within the further education sector in the authority's area; (ba) proprietors of 16 to 19 Academies in the authority's area; (c) persons in the local authority's area who will be relevant young adults when the arrangements or payments have effect, and their parents; (d) the Secretary of State; and (e) any other person specified by the Secretary of State. The authority must prepare for each academic year a transport policy statement that amongst others must specify any transport or other arrangements, and any payment of travelling expenses, made or to be made in relation to relevant young adults. The statement must be published by the end of May in the year in which the relevant academic year begins.

Section 509AA of the Act *(provision of transport etc. for persons of sixth form age)* obliges local authorities to prepare, for each academic year, a transport policy statement specifying the arrangements for the provision of transport or otherwise that it considers necessary to make for facilitating the attendance of persons of sixth form age receiving education or training at: Schools; any institution maintained or assisted by the authority which provides

further education or higher education (or both); any institution within the further education sector; any 16 to 19 Academy; or any other establishment supported by the Education Funding Agency (EFA). ”Persons of sixth form age” means those over compulsory school age but under 19 (or those who began a course of education or training before turning 19 and are still attending that course). Local authorities are obliged to secure that effect is given to the arrangements specified in transport policy statements.

Section 509AB(1) of the Act *(further provision about transport policy statements for persons of sixth form age)* imposes a requirement that the transport policy statement should set out the extent to which the arrangements specified in the statement include arrangements for facilitating the attendance at schools and learning providers of young people with learning difficulties and/or disabilities. Arrangements for this group of young people must therefore be set out explicitly in the statement.

In preparing the transport policy statement for persons of sixth form age, the local authority must consult: a) any other local authority that they consider it appropriate to consult; b) the governing bodies of schools and further education institutions; c) persons in the local authority area who will be of sixth form age when the statement has effect, and their parents; d) Transport for London (TfL); and e) any other person specified by the Secretary of State. The Statutory Guidance referred to below provides that *"48. Other bodies including education and training providers; higher education institutions; transport companies and authorities operating in the locality; public sector bodies; community groups; voluntary organisations and groups/organisations with an interest in disability issues (including independent specialist providers) should also be consulted where appropriate."*

In preparing and publishing the policy statement, the local authority must have regard (among other things) to the need to— (a) include in the statement sufficient information about the matters that the statement must specify, and (b) publish the statement in time, to enable persons who will be of sixth form age when the statement has effect and their parents to take reasonable account of those matters when choosing between different establishments at which education or training is provided.

In preparing the post 16 statement, the local authority shall have regard to any guidance issued by the Secretary of State. The DfE has issued the Post 16 Transport and Travel Support to Education and Training Statutory Guidance that the authority must have due regard to.

The consultation to be undertaken must be adequate and fair having regard to all the circumstances. The consultation must take place at a time when the proposed change is still at its formative stages. The Council must provide the consultees with sufficient information to enable them properly to understand the proposed changes 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 proposed changes and to respond.

Equality

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

- eliminate discrimination, harassment and victimisation and any other conduct prohibited under the Act
- advance equality of opportunity between people who share 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. The first part of the duty applies to marriage and civil partnership status only.

The proposed decision is to approve a public consultation on the proposed changes to the current SEN Transport Policy (to be renamed as the Travel Assistance Policy), which ensures that the Local Authority delivers home-school transport in accordance with national guidance. In particular it promotes and supports transport which is sustainable,

creates a greener environment and wherever possible supports young people to be independent and achieve their education outcomes; where young people require assistance due to their SEND needs the proposal is for this to be supported based on an assessment of individual needs in accordance with the policy.

This will affect:

- all children and young people who require support with transport to school
- children and young people with SEND
- parents and carers with disabilities who are prevented by virtue of their disabilities from transporting their children to school
- workforce capacity to respond to providing travel assistance

Accordingly, this policy will affect the following groups who have protected characteristics: Children and young people; Children and young people with SEND and adults with disabilities.
The objective of the proposed decision is to improve the Council's policies and processes in relation to the provision of home-school transport by providing clear guidance and formal dispute resolution processes in accordance with national guidance.

This will lead to better access and support for Home-School transport for children, young people and adults with disabilities, helping address difficulties they may face in travelling to school by virtue of their protected characteristics, in particular if they or their parents or carers have SEND.

The proposed decision therefore represents a measure to:

- support access to education for all children and young people including those with SEND
- ensure children and young people of parents with a disability who cannot otherwise transport their children to school have access to home-school transport.

As part of the public consultation on the proposals to change the current policy, provision will be made to ensure that families, schools and other parties have sufficient time to respond to proposed changes. Accessibility needs will also be accommodated by providing translated and/or large print copies of the consultation on request. The consultation will also be promoted so as to maximise reach and seek the views of interested families and parties as far as possible.

An EQIA is underway to understand the key groups who will be affected by the policy, how they will be impacted by it, and any mitigations that might be needed in order to ensure that the public sector duty is met. This will be finalised and brought for approval alongside the final Travel Assistance Policy.

The Council will take steps to collect demographic data on service users in order to identify any inequalities in service provision that may arise and to inform future equalities analysis.

9. Use of Appendices

Appendix 1 – Home to school travel and transport guidance; Statutory guidance for local authorities July 2014
Appendix 2 – Haringey Assisted Travel Policy 5 – 16 year
Appendix 3 – Haringey Assisted Travel Policy Post 16
Appendix 4 – Proposed consultation questions
Appendix 5 – Haringey Travel Policy 2018-2020.

10. Local Government (Access to Information) Act 1985

N/A

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Department for Education

Home to school travel and transport guidance

Statutory guidance for local authorities

July 2014

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Summary

This is statutory guidance from the Department for Education. This means local authorities are under a duty to have regard to it when carrying out their duties in relation to home to school travel and transport, and sustainable travel.

This guidance is issued under duties placed on the Secretary of State by sections 508A and 508D of the Education Act 1996 (the Act). It deals with sections 508A, 508B, 508C, 509AD, and Schedule 35B of the Act which were inserted by Part 6 of the Education and Inspections Act 2006 (the EIA 2006).

This guidance replaces Home to School Travel and Transport Guidance Ref: 00373-2007BKT-EN.

Review date

This guidance will next be reviewed in 2017.

What legislation (including statutory instruments) does this guidance refer to?

This guidance refers to the following legislation (including statutory instruments):

- Sections 444, 508A, 508B, 508C, 508D, 509AD and Schedule 35B of the Education Act 1996 (the Act), as inserted by Part 6 of the Education and Inspections Act 2006 (the EIA 2006)
- Regulation 5 and Part 2 of Schedule 2 to The School Information (England) Regulations 2002, as amended
- Equality Act 2010
- School Admissions Code
- European Convention on Human Rights
- The School Travel (Pupils with Dual Registration)(England) Regulations 2007
- Public Service Vehicles (Carrying Capacity) Regulations 1984
- Section 48 of the School Standards and Framework Act 1998

Who is this guidance for?

This guidance is for:

- Local authorities
- Leaders of maintained schools, academies and free schools
- Parents
- Other interested parties, e.g. Transport Providers

Main points

- There has been no change to school transport legislation and the associated duties continue to rest with local authorities.
- With the widening of the academies programme, the introduction of the free schools programme, and all schools now having the power to decide their session times, there will be an increasing need for local stakeholders to work together in partnership to agree and deliver transport policies that meet the particular needs of their area[1].
- The guidance on appeals has changed and is intended to ensure greater consistency in approach and to be clearer and more transparent for both parents and local authorities.
- The policy for post 16 transport is different from that for compulsory school aged children (5-16). The link to the department's guidance on post 16 transport is provided in the 'Further information' section of this guidance.
- Local authorities should review travel policies, arrangements and contracts regularly to ensure best value for money is achieved.

Local authorities' statutory duties

In order to comply with their home to school transport duties local authorities must:

- Promote the use of sustainable travel and transport (Part 1.1).
- Make transport arrangements for all eligible children (Part 1.2).

[1] See Hertfordshire County Council's approach to capacity building in the case study at Annex 1.

Part 1 - Statutory duties

1.1 Sustainable school travel

1. Section 508A of the Act places a general duty on local authorities to promote the use of sustainable travel and transport[2]. The duty applies to children and young people of compulsory school age who travel to receive education or training in a local authority's area[3]. The duty relates to journeys to and from institutions where education or training is delivered.

2. There are five main elements to the duty which local authorities must undertake:

- an assessment of the travel and transport needs of children, and young people within the authority's area;
- an audit of the sustainable travel and transport infrastructure within the authority's area that may be used when travelling to and from, or between schools/institutions;
- a strategy to develop the sustainable travel and transport infrastructure within the authority so that the travel and transport needs of children and young people are best catered for;
- the promotion of sustainable travel and transport modes on the journey to, from, and between schools and other institutions; and
- the publication of Sustainable Modes of Travel Strategy.

3. The Act defines sustainable modes of travel as those that the local authority considers may improve the physical well-being of those who use them, the environmental well-being of all or part of the local authority's area, or a combination of the two.

Assessing the travel and transport needs of children and young people

4. Local authorities should, in large part, base their assessment of children and young people's travel and transport needs on the data provided by schools or colleges, often contained within school travel plans. Effective school travel plans, updated as necessary, put forward a package of measures to improve safety and reduce car use, backed by a partnership involving the school, education, health and transport officers from the local authority, and the police. These seek to secure benefits for both the school and the children by improving their health through active travel and reducing congestion caused by school runs, which in turn helps improve local air quality. Many travel plans

[2] See Darlington Borough Council's approach to sustainable travel in the case study at Annex 1.

[3] 'Child', 'compulsory school age' and 'sixth-form age' are defined respectively in sections 579(1), 8 and 509 AC of the Act.

are produced as a result of planning conditions placed on new developments by local authority planning departments. This highlights the need for all relevant departments (e.g. highways departments, planning departments, transport departments, children's services, environment departments, and public health) to be fully engaged when addressing this duty.

Audit of infrastructure to support sustainable school travel

5. Local authorities already collect much of the information required for the audit of the infrastructure supporting sustainable school travel. Local authorities should audit infrastructure in accordance with any relevant guidance and the requirements of any infrastructure implemented. Specific school routes audits are considered good practice. The specifics of the audit and how often it should be reviewed are for a local authority to decide on as appropriate. However, the audit should include a mapping exercise showing how schools are served by:

- bus and other public transport routes (including school transport provided by the local authority);
- footpaths, cycle ways, roads and associated features (including crossing points and patrols, traffic calming measures, speed limits, 20mph zones); and
- any other arrangements made to support sustainable school transport that may be in operation (including the provision of cycle training, road safety training, and independent travel training; the provision of walking promotion and barrier removal schemes, car sharing schemes, park and stride/ride schemes, cycle parking).

6. The audit should also consider data relating to personal safety and security, and other factors that influence travel choices, such as poor behaviour on school buses and/or the incidence of bullying on the journey to school. School travel plans will help local authorities understand any specific local issues, including perceptions of pupils and parents.

7. The arrangements or requirements for children with special education needs (SEN) or disabilities should also be considered and whether, for example, some might benefit from independent travel training which can result in a skill for life[4].

Strategy to develop infrastructure to support travel needs of pupils

8. Following the assessment of pupil needs, and audit of the sustainable transport infrastructure that supports travel to school, local authorities must establish a strategy for

[4] See Coventry City Council's approach to independent travel training in the case study at Annex 1.

developing that infrastructure so that it better meets the needs of children and young people in their area. These improvements should address a range of objectives, including environmental improvements, health benefits and enhanced child safety and security. The strategy should be a statement of the authority's overall vision, objectives and work programme for improving accessibility to schools and will be an important source of information to parents on the travel options available to them when expressing their preferences for particular schools in the admissions round.

9. The strategy should be evidence-based, including an assessment of the accessibility needs and problems of the local authority's area. Local authorities must monitor the implementation of their strategy and revise these as they feel necessary.

Promoting sustainable travel and transport to and from school

10. Local walking, cycling, and bus strategies should inform the local authority's duty to promote sustainable school travel. In line with the physical Olympic and Paralympic legacy, as set out in HM Government's document 'Moving More, Living More', promotion of walking and cycling to school can be an effective way to increase physical activity in children.

11. The sustainable school travel duty should have a broad impact, including providing health benefits for children, and their families, through active journeys, such as walking and cycling. It can also bring significant environmental improvements, through reduced levels of congestion and improvements in air quality to which children are particularly vulnerable.

Publication of Sustainable Modes of Travel Strategy

12. The Education (School Information) (England) Regulations 2002, as amended require local authorities to publish their Sustainable Modes of Travel Strategy on their website by 31 August each year[5].

1.2 Provision of travel arrangements

13. Sections 508B and 508C of the Act make provision for local authorities to ensure that suitable travel arrangements are made, where necessary, to facilitate a child's attendance at school.

[5] S.I. 2002/2897, amended by The Education (School Information) (England) (Amendment) Regulations 2007 (S.I. 2007/1365).

14. These provisions apply to home[6] to school travel arrangements, and vice versa[7]. They do not relate to travel between educational institutions during the school day[8].

15. Parents are responsible for ensuring that their children attend school regularly. However, section 444(3B) of the Act provides that a parent will have a defence in law against a prosecution by a local authority for their child's non-attendance at school where the local authority has a duty to make travel arrangements in relation to the child under section 508B and has failed to discharge that duty.

1.3 Provision of travel arrangements: Eligible children

16. Section 508B of the Act deals with the duty on local authorities to make such travel arrangements as they consider necessary to facilitate attendance at school for eligible children. Schedule 35B of the Act defines eligible children – those categories of children of compulsory school age (5-16) in an authority's area for whom free travel arrangements will be required local authorities are required to:

Statutory walking distances eligibility

- provide free transport for all pupils of compulsory school age (5-16) if their nearest suitable school[9] is:
    - beyond 2 miles (if below the age of 8); or
    - beyond 3 miles (if aged between 8 and 16)

Special educational needs, a disability or mobility problems eligibility

- make transport arrangements for all children who cannot reasonably be expected to walk to school because of their mobility problems or because of associated health and safety issues related to their special educational needs (SEN) or disability[10]. Eligibility, for such children should be assessed on an individual basis to identify their particular transport requirements. Usual

[6] A child's 'home' is the place where he/she is habitually and normally resident.

[7] Including to boarding provision, where applicable.

[8] When a dual placement is outlined on an EHC Plan or statement, a local authority should use its discretion to decide on how best to cater for this child's individual circumstances.

[9] Taken to mean the nearest qualifying school with places available that provides education appropriate to the age, ability and aptitude of the child, and any SEN that the child may have.

[10] As per Schedule 35 of The Act, disability is as defined in S.6 of EA 2010: a person has a disability if they have (a) a physical or mental impairment, and (b) that impairment has a substantial a long-term effect on the ability to carry out normal day-to-day activities. Therefore a chronic health condition may lead to eligibility under this definition.

transport requirements (e.g. the statutory walking distances) should not be considered when assessing the transport needs of children eligible due to SEN and/or disability.

Unsafe route eligibility

- make transport arrangements for all children who cannot reasonably be expected to walk to nearest suitable school because the nature of the route is deemed unsafe to walk.[11].

Extended rights eligibility

- provide free transport where pupils are entitled to free school meals or their parents are in receipt of maximum Working Tax Credit [12] if:
    - the nearest suitable school is beyond 2 miles (for children over the age of 8 and under 11);
    - the school is between 2 and 6 miles (if aged 11-16 and there are not three or more suitable nearer schools);
    - the school is between 2 and 15 miles and is the nearest school preferred on the grounds of religion or belief (aged 11-16).

Accompaniment

17. In determining whether a child cannot reasonably be expected to walk for the purposes of 'special educational needs, a disability or mobility problems eligibility' or 'unsafe route eligibility', the local authority will need to consider whether the child could reasonably be expected to walk if accompanied and, if so, whether the child's parent can reasonably be expected to accompany the child. When considering whether a child's parent can reasonably be expected to accompany the child on the journey to school a range of factors may need to be taken into account, such as the age of the child and whether one would ordinarily expect a child of that age to be accompanied.

18. The general expectation is that a child will be accompanied by a parent where necessary, unless there is a good reason why it is not reasonable to expect the parent to do so.

19. Local authorities should, however, promote and ensure equality of opportunity for disabled parents. For example, if a parent's disability prevents them from accompanying

[11] Paragraphs 4 and 5 of Schedule 35B.
[12] Paragraphs 9-14 of Schedule 35B.

their child along a walking route that would otherwise be considered unsafe without adult supervision, a reasonable adjustment might be to provide free home to school transport for the child in question.

Assessing route safety

20. Creating safe walking, cycling and travel routes and encouraging more pupils to walk and cycle to school is one of the best ways to reduce the need for transport and associated costs. In assessing safety, local authorities should consider a range of risks, such as: canals, rivers, ditches, speed of traffic and fields of vision for the pedestrian or motorist. An authority should also consider whether it is reasonable to expect the child's parent to accompany the child along a route which would otherwise be classified as being unsafe.

21. Good practice shows that using local knowledge, coupled with modern IT tools, is essential when assessing existing walking routes and identifying potential new ones. Putting in place suitable new paths, pedestrian crossings and cycle lanes can improve safety, but minimal investment can also reap significant rewards. This might be something as simple as trimming overgrown hedges or preventing illegal parking. Making parents aware of safe walking routes and the time taken to assess them can help alleviate concerns and significantly increase the amount of pupils choosing to walk.

Measurement of routes

22. The measurement of the statutory walking distances is not necessarily the shortest distance by road. It is measured by the shortest route along which a child, accompanied as necessary, may walk safely. As such, the route measured may include footpaths, bridleways, and other pathways, as well as recognised roads.

23. The 2 mile limit for extended rights should be measured in the same way as the statutory walking distances. However, the 6 mile upper limit to a choice of schools, and the 15 mile upper limit to a school preferred on grounds of religion or belief are not walking routes, and should therefore be measured along routes that are passable using a suitable motorised vehicle. In short, the upper limits should be measured along road routes.

Timing of assessment of eligibility

24. At the point when transport eligibility is considered, the prospect of being able to secure a place in an alternative (usually nearer) school must be a real one. For most cases this will be during the normal school admissions round when places are allocated. A smaller number of cases will need to be considered during the course of the school year e.g. as a result of families moving to a new area.

25. Where entitlement to extended travel rights has been established the department's opinion is that local authorities should consider the pupil to be eligible for the entirety of

the school year for which the assessment has been made. If a pupil ceases to be eligible any change to provision made by the local authority must be considered in the context of the potential impact on the child. Disruption to a child's education should be avoided.

26. Where a pupil is registered at a school, but is attending a place other than that school as a result of temporary exclusion, eligibility for home to school travel will apply to the other place for the temporary period.

Qualifying school

27. The relevant educational establishment in relation to an eligible child will be either a qualifying school or the place, other than a school, where they are receiving education by virtue of arrangements made under section 19(1) of the Act[13].

28. Regulations[14] clarify the entitlement for eligible children, a small number of whom may be registered at more than one educational establishment, e.g. children of no fixed abode might be registered at more than one school, and other children may be registered at a hospital school and another school, etc.

29. Qualifying schools are:

- community, foundation or voluntary schools;
- community or foundation special schools;
- non-maintained special schools;
- pupil referral units;
- maintained nursery schools; or
- city technology colleges (CTC), city colleges for the technology of the arts (CCTA) or academies, including free schools and University Technical Colleges (UTC)[15].

30. For children with SEN, an independent school can also be a qualifying school where this is named on the child's Education, Health and Care Plan (EHC Plan) or statement, or it is the nearest of two or more schools named.

Travel arrangements made by the local authority or other bodies/persons

31. Examples of other bodies or persons making travel arrangements might include: a parent consenting to use their car in return for a mileage allowance; a school or group of

[13] Section 508B(10) of the Act.
[14] The School Travel (Pupils with Dual Registration)(England) Regulations 2007 (S.I.2007/1367).
[15] Paragraph 15 of Schedule 35B.

schools reaching an agreement with a local authority to provide transport in minibuses owned by the school; or a transport authority providing free passes for all children on public transport. For example, in London, Transport for London provides free bus passes for all children under the age of 16. In many circumstances, London Boroughs may therefore not need to make any additional travel arrangements for children living in their area, particularly when eligibility would be through statutory walking distances or extended rights.

32. Subsection (4) of 508B and 508C of the Act list some of the travel and transport arrangements that may be made. These might include: provision of a seat on a bus or minibus provided by the local authority; provision of a seat in a taxi where more individualised arrangements are necessary; and provision of a pass for a public service bus, or other means of public transport.

33. On condition that the relevant parental consent has been obtained (annually or, if a child moves school, at that point too) by the local authority, a number of alternative arrangements might be considered to meet the local authority duty relating to travel arrangements. Examples include:

- a mileage allowance paid to a parent driving their eligible child to school in lieu of the local authority making arrangements for a taxi to transport the child;
- a cycling allowance paid by the local authority where the parent agreed for their child to cycle to and from school instead of catching a bus for, say a three mile journey; and
- local authority provision of a suitable escort to enable an eligible child with a disability to walk a short distance to school in safety, instead of making arrangements for a taxi to take them to and from school.

Suitability of arrangements

34. As a general guide, transport arrangements should not require a child to make several changes on public transport resulting in an unreasonably long journey time. Best practice suggests that the maximum each way length of journey for a child of primary school age to be 45 minutes and for secondary school age 75 minutes, but these should be regarded as the maximum. For children with SEN and/or disabilities, journeys may be more complex and a shorter journey time, although desirable, may not always be possible.

35. Consideration should also be given to the walking distance required in order to access public transport. The maximum distances will depend on a range of circumstances, including the age of the child, their individual needs and the nature of the routes they are expected to walk to the pick up or set down points and should try to be combined with the transport time when considering the overall duration of a journey. With regards to pick up points, local authorities may at their discretion use appropriate pick up points when making travel arrangements. For arrangements to be suitable, they must

also be safe and reasonably stress free, to enable the child to arrive at school ready for a day of study.

Part 2 - Discretionary Arrangements

Travel arrangements for other children

36. Section 508C of the Act provides local authorities with discretionary powers to go beyond their statutory duties and provide transport for children who are not entitled to free transport. Charges can be made, or, as stated in Subsection (5) of 508C local authorities may also pay all or part of the reasonable travel expenses of children who have not had travel arrangements made either under the statutory duty placed on local authorities, or under their discretionary powers to make travel arrangements. Where charges are imposed, good practice suggests that children from low income groups (those not eligible for extended rights, either due to being just outside financial eligibility or live outside of the distance criteria and therefore not in receipt of free travel) should be exempt.

37. It is very much for the individual local authority to decide whether and how to apply this discretion as they are best placed to determine local needs and circumstances. It is recognised that local authorities will need to balance the demands for a broad range of discretionary travel against their budget priorities. While the department offers guidance, the final decision on any discretionary travel arrangements must rest with the individual local authority who should engage with parents and clearly communicate what support they can expect from the local authority.

Religion or belief

38. Many parents will choose to send their children to a school as near as possible to their home. However, some parents choose to send their children to a school with a particular ethos because they adhere to a particular faith, or belief. Local authorities need to respect parents' religious and philosophical convictions as to the education to be provided for their children[16], give careful consideration to discrimination issues and seek legal opinion if they are unsure about the effect of their policies, before publishing them each year.

39. Under the European Convention on Human Rights (ECHR), parents do not enjoy a specific right to have their children educated at a school with a religious character or a secular school, or to have transport arrangements made by their local authority to and from any such school and the Equality Act 2010 (which places a duty on local authorities

[16] Article 2 of the First Protocol.

not to discriminate against a person on the grounds of their religion or belief), does not apply to the exercise of an authority's functions in relation to transport[17].

40. However, the Secretary of State continues to attach importance to the opportunity that many parents have to choose a school or college in accordance with their religious or philosophical beliefs, and believes that wherever possible, local authorities should ensure that transport arrangements support the religious or philosophical preference parents express. In many cases these schools may be more distant and therefore the provision of transport and/or training, and the avoidance of unreasonable expenditure on travel are encouraged. However, the department appreciates that this may be incompatible, for example, on grounds of excessive journey length, or where the journey may have a detrimental impact on the child's education.

41. The Act places a duty on local authorities to make arrangements for secondary pupils from low income backgrounds to attend the nearest school preferred on grounds of "religion or belief", where that school is between 2 and 15 miles from their home. Local authorities may wish to use their discretionary powers to extend transport arrangements beyond the extended rights duty and facilitate attendance at such schools. The Secretary of State expects local authorities to consider all possible options before they disturb well established arrangements, some of which have been associated with local agreements or understandings about the siting of such schools. Local authorities should pay particularly careful attention to the potential impact of any changes on low income families (those not eligible under extended rights) whose parents adhere to a particular faith or philosophy, and who have expressed a preference for a particular school because of their religious or philosophical beliefs.

42. Local authorities will need to be aware of their obligation not to discriminate under article 14 of ECHR. For example, where local authorities use their discretionary powers to make travel arrangements for children on the basis of their parents' religious beliefs to schools designated with a religious character, the equalities implications should be considered, to facilitate parents' who wish their children to be educated in accordance with their philosophical convictions.

[17] s31 of, and paragraph 11 of Schedule 3 to, the Equality Act 2010.

Part 3 - Transport Considerations

Safeguarding requirements

43. It is the responsibility of the individual local authority to ensure the suitability of its employees and any contractors or their employees by undertaking the required safeguarding checks on those whose work or other involvement will bring them into contact with children, or more widely, vulnerable adults. This should include bus drivers, taxi drivers and escorts, as necessary. The Criminal Records Bureau (CRB) and the Independent Safeguarding Authority (ISA) have merged to become the Disclosure and Barring Service (DBS). CRB checks are now called DBS checks. Please see Further information.

Training and Equalities

44. All local authorities should ensure that all drivers and escorts taking pupils to and from school and related services have undertaken appropriate training, and that this is kept up to date. It is also considered good practice for those responsible for planning and managing school transport to have undertaken appropriate equality training. This training could consist of (but is not restricted to):

- an awareness of different types of disability including hidden disabilities;
- an awareness of what constitutes discrimination;
- training in the necessary skills to recognise, support and manage pupils with different types of disabilities, including hidden disabilities and certain behaviour that may be associated with such disabilities;
- training in the skills necessary to communicate appropriately with pupils with all types of different disabilities, including the hidden disabilities; and
- training in the implementation of health care protocols to cover emergency procedures.

Bus safety considerations

45. Buses and coaches used to take pupils to and from school are public service vehicles and, as such, are subject to specific legislation on safety standards. All coaches and minibuses carrying groups of children of 3 to 15 years of age on organised trips are required to be equipped with seat belts. The legal requirement to fit seat belts does not apply to other types of bus, including those on public service. These tend to travel relatively slowly, over short distances, with frequent stops. Schools or local authorities making arrangements for home to school transport are free to specify within their contracts that they will only accept vehicles fitted with seatbelts.

46. The Public Service Vehicles (Carrying Capacity) Regulations 1984 allow the option of three children under the age of 14 to occupy a bench seat designed for two adults on a

service bus. Modern bus designs and seat belt requirements are reducing the circumstances in which this practice can be adopted and in the opinion of the Secretary of State, local authorities making arrangements for home to school travel should only make use of this concession on an exceptional basis.

Poor behaviour on school buses/other modes of transport

47. The department expects each school to promote appropriate standards of behaviour by pupils on their journey to and from school through rewarding positive behaviour and using sanctions to address poor behaviour. The EIA 2006 empowers headteachers to take action to address unacceptable behaviour even when this takes place outside the school premises and when pupils are not under the legal control of the school, but when it is reasonable to do so. In the department's view, this would include behaviour on school buses, or otherwise on the route to and from school, whether or not the pupils are in school uniform.

48. A number of local authorities have adopted a policy of withdrawing transport, either for a temporary period, or permanently for more serious or repeated cases of misbehaviour. Equally, the behaviour of pupils outside school can be considered as grounds for exclusion. This will be a matter of judgment for the Headteacher[18]. Local authorities might also consider that escorts are necessary to ensure safety of pupils on buses and can stipulate the provision of suitable escorts in their tender documents.

Partnership

49. The department strongly supports local authorities in developing cross-cutting approaches to home to school travel and transport. Relevant considerations would include sustainability, delivering value money and finding school and parent friendly solutions. This could be through strong partnerships between local authorities and academies, the use of Department for Transport policies and practices, such as Local Transport Plans and Local Sustainable Transport fund (see Further information) and partnership with parents, for example to allow them to top up transport costs through the payment of fees in order to maintain the provision.

50. Partnerships are strongly encouraged, particularly in rural areas, where the generally more limited transport services could disadvantage children[19].

[18] https://www.gov.uk/government/publications/school-exclusion

[19] See Staffordshire County Council's approach to rural travel provision in case study at Annex 1.

Part 4 – Policy Changes

Publication of general arrangements and policies

51. Local authorities must publish general arrangements and policies in respect of home to school travel and transport for children of compulsory school age. This information should be clear, easy to understand and provide full information on the travel and transport arrangements. It should explain both statutory transport provision, and that provided on a discretionary basis. It should also set out clearly how parents can hold local authorities to account through their appeals processes. Local authorities should ideally integrate their Sustainable Modes of School Travel strategies into these policy statements, and publish them together.

Policy Changes

52. Local authorities should consult widely on any proposed changes to their local policies on school travel arrangements with all interested parties. Consultations should last for at least 28 working days during term time. This period should be extended to take account of any school holidays that may occur during the period of consultation.

53. Good practice suggests that the introduction of any such changes should be phased-in so that children who start under one set of transport arrangements continue to benefit from them until they either conclude their education at that school or choose to move to another school. Parents make school choices based on, amongst other things, the home to school transport arrangements for a particular school, and any changes might impact adversely on individual family budgets.

Part 5 - Appeals process

54. Local authorities should have in place both complaints and appeals procedures for parents to follow should they have cause for complaint about the service, or wish to appeal about the eligibility of their child for travel support. The procedure should be published alongside the local authority travel policy statement. If an appellant considers that there has been a failure to comply with the procedural rules or if there are any other irregularities in the way an appeal was handled they may have a right to refer the matter to the Local Government Ombudsman. If an appellant considers the decision of the independent appeals panel to be flawed on public law grounds, they may apply for a judicial review.

55. In the past we have left it to local authorities to determine how their appeals procedures should operate in practice. However, in the interests of consistency and to be both clearer and more transparent, for both parents and local authorities, we have now set out a recommended review/appeals process in Annex 2.

Further information

Post-16 transport

Guidance relating to post-16 transport is available on the department's website

Sustainable transport

British Cycling is the national governing body for cycling and can provide advice on cycling to school and cycle training. More information is available at www.britishcycling.org.uk

Department for Transport funding is available to Local Highway Authorities and Schools Games Organiser Host Schools for the provision of Bikeability cycle training for school children in England. This will teach children to cycle safely, confidently and competently on the roads. More information is available here: www.dft.gov.uk/bikeability/schools

The Department for Transport Local Sustainable Transport Fund was established to support authorities in delivering local economic growth whilst cutting carbon emissions from transport. Further information can be found at: https://www.gov.uk/government/collections/local-sustainable-transport-fund

Living Streets runs the national Walk to School campaign which reaches over 13 million people. The campaign successfully encourages and supports parents/carers and children to make walking to school part of their daily routine. More information is available on their website www.livingstreets.org.uk

Modeshift is the national sustainable travel organisation. Modeshift supports local authorities, schools, business and communities to increase levels of sustainable travel. More information is available on their website www.modeshift.org.uk

Moving More, Living More is a document produced by the Department of Health which builds on the work already under way to help realise the aim of having a more physically active nation as part of the legacy from the London 2012 Olympic and Paralympic Games: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/279657/moving_living_more_inspired_2012.pdf

Sustrans is the leading sustainable transport charity that provides practical advice that can be passed onto parents to increase confidence in walking and cycling. More information is available on their website: www.sustrans.org.uk

DBS (formerly CRB) employee suitability checks

Further information about DBS checks (and who requires them or is eligible, for example bus drivers for designated home to school transport are eligible, whereas those driving

public services are not) can be obtained from: https://www.gov.uk/disclosure-barring-service-check

Definitions

- Section 444(5) of the Act defines the statutory walking distances.
- Schedule 35B of the Act defines:
  - ‘eligible children’ (paragraphs 2-7 and 9-13);
  - ‘qualifying school’ (paragraph 15);
  - ‘disabled child’ (paragraph 15(4));
  - ‘religion and belief’ (paragraph 15(6)) and 509AD of the Act;
  - ‘low income family’ (paragraphs 9-14).
- Section 579 of the Act defines ‘child’.
- Section 509AC of the Act defines ‘compulsory school age’.
- The Equality Act 2010 defines ‘religion or belief’ for the purposes of this Act.
- The Children’s and Families Act section 10 defines ‘SEN’

Key term Glossary

- Home: A child's 'home' is the place where he/she is habitually and normally resident.
- Nearest suitable school: Taken to mean the nearest qualifying school with places available that provides education appropriate to the age, ability and aptitude of the child, and any SEN that the child may have.
- Parent: Reference to parent in this document should be equated to mean parent/carer/legal guardian.
- Philosophical Belief: For a philosophical "belief" to be worthy of protection, it must attain a certain level of cogency, seriousness, cohesion and importance; be worthy of respect in a democratic society; and not be incompatible with human dignity or the fundamental rights of the child. Examples of beliefs are humanism and atheism.
- Road routes: Reference to road route should be taken to mean a route passable by a motor vehicle, and could include distance covered on additional transport, e.g. via ferry.

Annex 1: Case Studies

Sustainable travel

Effective sustainable travel plans have wider benefits for a local area than simply improving access to schools and education. Evidence shows that school travel plans can have benefits ranging from increased road safety, to healthier, more alert and engaged pupils, to increasing independent travel and associated life skills for pupils with SEN. Enabling the increased use of sustainable modes of travel such as walking, cycling and the use of public transport has environmental benefits in reducing levels of noise, congestion and poor air quality - the latter of which children are particularly at risk to.

Darlington Borough Council case study

Impact/benefits

The data from 2011-12 indicates that on average, 7% of secondary school pupils are choosing to cycle to school. Before the Local Motion initiative began, this figure stood at just 1%.

Details of the approach

Darlington Borough Council has encouraged a modal shift away from the car to more sustainable modes under the brand ‘Local Motion’. The Local Sustainable Transport Fund has provided funding for the continuation of this project since 2011. It ensures that schools, young people and their families receive relevant information, to enable them to choose sustainable travel options to get to and from school.

How was the change made?

The whole schools package is underpinned by the Modeshift STARS online accreditation scheme which recognises and rewards each school’s commitment to promoting sustainable travel. All Darlington schools must engage with Modeshift STARS in order to access other support and resources from the Local Motion project.

A new Year 6 Transition Programme has been introduced to help pupils and their parents make informed choices about sustainable travel options to the secondary school they will be attending.

All Darlington secondary schools have converted to academy status, but have continued to engage with the Local Motion programme and continue to support sustainable travel.

Advice for other LAs contemplating such an initiative

The Local Motion Transition encourages families to start thinking about how they are going to travel to secondary school long before they start at the school, to avoid relying on private cars.

For further information please email Louise Neale: louise.neale@darlington.gov.uk

Stoke-on-Trent case study

Impact/benefits

After just one year of Sustrans' engagement (2013/14) regular cycling amongst pupils (once or twice a week or more) increased from 8.5% to 12.7% and those regularly being driven (once or twice a week or more) decreased from 49.9% to 45.3%. This is helping to reduce the impact of congestion from education travel which is estimated to cost £2.6m per year.

Details of the approach

Stoke is one of eight partner local authorities in the Access to Education (A2E) programme, led by Devon County Council and coordinated by Sustrans. It is funded by the Local Sustainable Transport Fund.

Using locally-tailored packages Sustrans provide a real alternative to the car for trips to schools, colleges and universities, reducing congestion, improving journey reliability and boosting local economies.

How was the change made?

- Intensive engagement from two Sustrans officers working with 21 primary and seven secondary schools
- Provision of 'Access to Bikes School Hubs' – shipping containers that contain 15 bikes, helmets, hi-viz jackets, pumps, locks, lights and maintenance tools placed in nine schools
- Installation of cycle parking and scooter pods at schools
- A programme of highway safety improvements, including new crossings and off-road cycle access links from residential areas to schools

Advice for other LAs contemplating such an initiative

Schools need to have intensive support over an extended period of time which would include building the skills, knowledge and confidence of 'champions' to deliver the ongoing work. The Sustrans School Mark, an accreditation scheme which recognises and supports schools' excellence in active and sustainable travel, provides a framework to drive this forward.

For further information please email Allan Williams: allan.williams@sustrans.org.uk

Home to school travel assistance for pupils with SEN or disabilities

Research indicates that there can be significant short and long term benefits in the application of independent travel training for pupils with special educational needs or disabilities. The training given can result in savings to transport budgets in the short term, but can also provide longer term benefits to the individual in terms of a skill for life that might lead to greater social inclusion and employment prospects.

Coventry City Council case study

Impact/savings achieved

As a result of this initiative and tighter control and work to secure efficiencies in the operation of the home to school travel assistance programme the Council made £326k savings in 2011/12. The savings made in 2012/13 equated to £374k which includes the reductions in expenditure on home to school escorts. The total reduction over the 2 years is a 19% fall in expenditure.

Details of the new approach

Successful work has been undertaken to provide independent travel training for secondary aged pupils and the provision of personal transport budgets to the parents of pupils in special schools. This has enabled young people to become more independent and given them valuable skills for life, as well as securing a reduction in spending for the Council.

How was the change made?

Impower Consultancy was commissioned to identify potential efficiencies. Focus groups of parents of pupils with SEN or disabilities were formed to seek views and identify new ways of working. Two key work streams were then established to take forward the provision of Independent Travel Training and Personal Transport Budgets (PTBs).

Two travel trainers now focus their work on school aged pupils, to help them improve their independence skills. This also reduces the number of adults needing training in subsequent years.

The Council also developed a scheme to offer PTBs to parents. The funding was high enough to incentivise parents, while being low enough to deliver savings for the Council. This was piloted in one school initially and then rolled out across all the special schools.

Advice for other LAs implementing the change

Special school headteachers are fully involved in this initiative and they help identify suitable young people to undertake training.

Contacting parents by telephone was resource intensive, but very positive in terms of fully explaining the benefits and options. PTBs are voluntary, tailored and non-prescriptive. The attendance and punctuality of pupils with a PTB is monitored. Beyond this there is no prescription and parents are not asked to account for expenditure.

For further information please email Marian Simpson: marian.simpson@coventry.gov.uk

Capacity building with schools and transport operators

In a financial climate where spending is reduced and costs are increasing local authorities may well find that they have less funding available to support discretionary transport provision, but there may be alternative solutions.

Many academies, with support from their local communities, are taking full advantage of their academy freedoms and are collaborating with other stakeholders and providers to offer discretionary transport to their schools. Local authorities can greatly assist with these initiatives by sharing their experience, expertise and influence in the procurement of transport.

Hertfordshire County Council case study

Impact/savings achieved

£5-6 million will be saved each year as a result of schools and commercial operators providing discretionary travel on routes previously funded and delivered by the Council.

Details of the new approach

From September 2012 Hertfordshire County Council introduced a statutory only home-school transport policy. The Council was keen to attract third party providers to arrange transport on routes which it had previously organised and subsidised and that catered mainly for children without a statutory entitlement to home to school transport.

The Council has worked to build capacity locally to encourage and enable schools, community groups and commercial operators to provide school transport. From September 2013 a total of 130 routes to schools of preference operate without a financial subsidy from the Council. Thirty of these routes have been operating since April 2012.

How was the change made?

The Council supported schools and parents to help develop transport plans. The Council also secured the involvement of the commercial sector and promoted awareness of business opportunities to it.

Advice for other LAs implementing the change

Commercial operators require routes to be financially secure, and therefore are only likely to consider taking on routes where there is a predicted, fare paying commitment from parents. School transport only accounts for 192 days a year.

Local authorities should act as facilitators with the commercial sector, to help schools with contracts and to ensure competition law is followed. Models should rely on parents being able to fund their family's school transport, without any subsidy from the LA. In the

current financial climate, there has been more opportunity for commercial coach companies to participate in this market, rather than commercial bus companies.

For further information please email Sarah Vize: sarah.vize@hertfordshire.gov.uk

Demand responsive service in rural areas

Counties with a large number of small rural communities face the challenge of ensuring that children in these communities are transported to their local schools whilst also providing a cost efficient transport network to the wider community to avoid rural isolation. Rural transport is essential in sustaining local rural communities and connecting people with essential services.

Staffordshire County Council case study

Impacts/Benefits

As a result of replacing infrequent existing local service buses and incorporating home to school transport on to a demand responsive service, a sustainable service has been developed which transports children to school and enables the rural population to be connected with essential services and the wider community. Children that have been transported to school frequently go on to use the service when they move up to middle or high school, increasing their independence despite their rural location.

Details of the approach

Moorlands Connect, a Demand Responsive Service was launched in 2010. The service incorporates the home to school transport to two village schools within the operating area which covers approximately 125 square miles. Outside school transport times the vehicles can be booked as a door to door service to transport people to work, appointments or other essential journeys. Using smaller vehicles and a demand responsive approach that is not tied to a scheduled route has meant that remote areas now have access to a service.

How was the change made?

A rural transport review was commissioned in 2008 and recommended the implementation of a demand responsive service. Residents in the area were consulted and current services, including home to school transport, were reviewed to establish which services could be incorporated on to a new service to increase its sustainability. Funding was sourced from various external agencies for the purchase of two fully accessible vehicles that carry bicycles and the service was launched in September 2010. It continues to be well used by the local communities and also by visitors to the area who can get out and about in the Peak District using the service.

Advice for other LA’s implementing the change

The process in setting up the service should include service demand evaluation, assessment of service options, the associated costs and, importantly, comprehensive consultation. Such service complements existing local bus services and provides

alternative choice for passengers. The latter ensures new and continuing public and political support for the scheme. Ticketing options need to be considered, including onward ticketing and potential integration with the local bus service(s). All funding options should be explored at a local and national level; this connect service received initial funding from Districts, Staffordshire Police and Fire services. Once the service is operational there is the need to monitor and evolve the service to meet ongoing needs and changing travel patterns.

For further information please email: kathryn.grattage@staffordshire.gov.uk

Annex 2: Recommended Review/Appeals Process

Previous guidance made clear that local authorities should have in place and publish their appeals procedures, but left it to the individual authority to determine how this should operate in practice. We are now recommending that local authorities adopt the appeals process set out below, appreciating that specifics, such as the identification of an appeal compared to a complaint, will need to be decided by local authorities. The intention is to ensure a consistent approach across all local authorities, and to provide a completely impartial second stage, for those cases that are not resolved at the first stage.

Local authorities should publish annually their appeals process on their website. This should set out a clear and transparent two stage process (with paper copies available on request) for parents who wish to challenge a decision about:

- the transport arrangements offered;
- their child's eligibility;
- the distance measurement in relation to statutory walking distances; and
- the safety of the route.

Stage one: Review by a senior officer

- A parent has 20 working days[20] from receipt of the local authority's home to school transport decision to make a written request asking for a review of the decision.
- The written request should detail why the parent believes the decision should be reviewed and give details of any personal and/or family circumstances the parent believes should be considered when the decision is reviewed.
- Within 20 working days of receipt of the parent's written request a senior officer reviews the original decision and sends the parent a detailed written notification of the outcome of their review, setting out:
- the nature of the decision reached;
- how the review was conducted (including the standard followed e.g. Road Safety GB[21]);
- information about other departments and/or agencies that were consulted as part of the process;
- what factors were considered;
    - the rationale for the decision reached; and

[20] As with the whole appeals process the timings are recommended and not compulsory. We envisage many appeals will be dealt with much sooner that these timings, particularly those which have a time pressure, whilst complex cases may take longer.

[21] Road Safety GB is the sole published standards known to the department, hence referenced.

- information about how the parent can escalate their case to stage two (if appropriate).

Stage two: Review by an independent appeal panel

A parent has 20 working days from receipt of the local authority's stage one written decision notification to make a written request to escalate the matter to stage two.

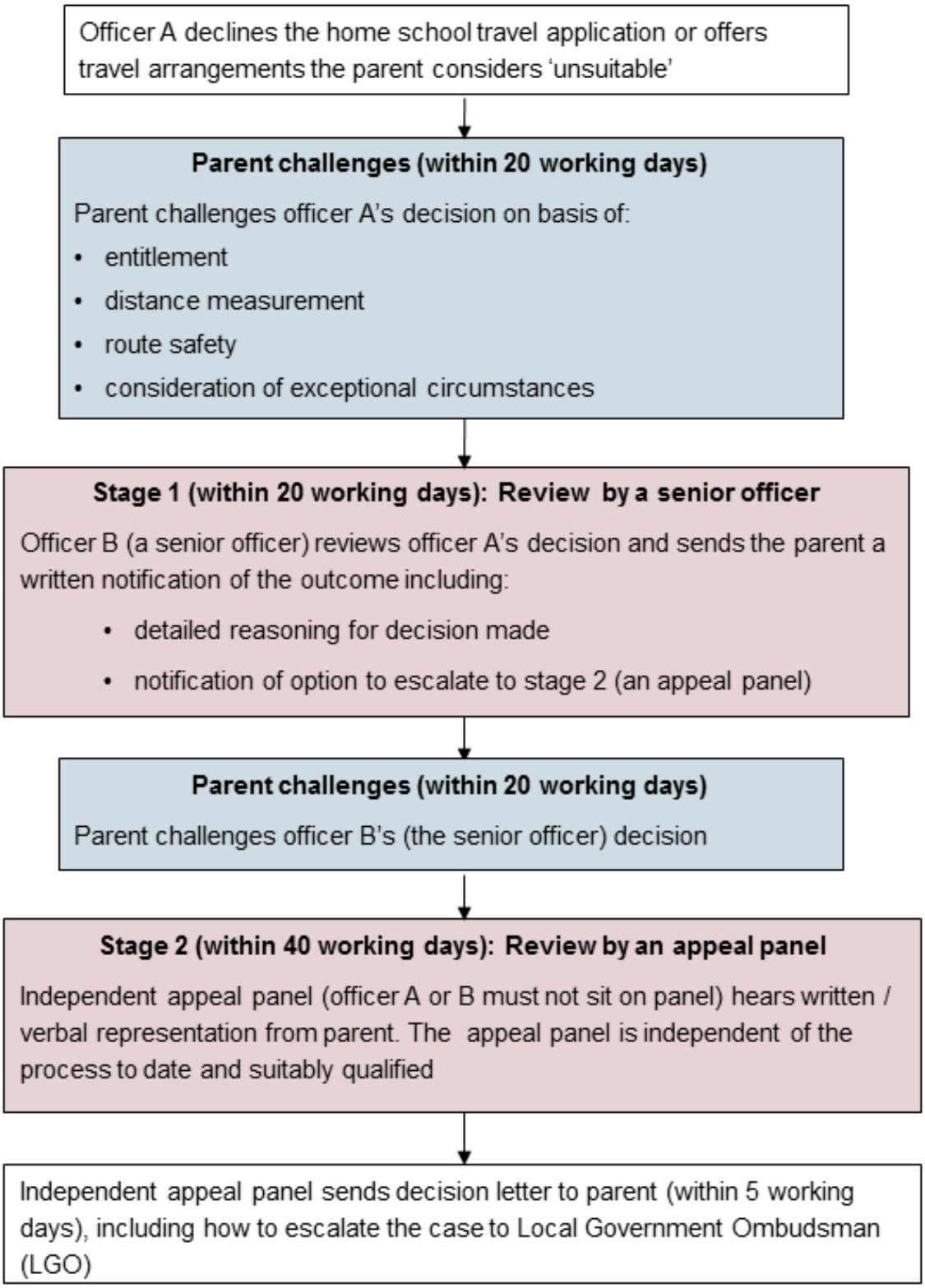
Within 40 working days of receipt of the parents request an independent appeal panel considers written and verbal representations from both the parent and officers involved in the case and gives a detailed written notification of the outcome (within 5 working days), setting out:

- the nature of the decision reached;
- how the review was conducted (including the standard followed e.g. Road Safety GB);
- information about other departments and/or agencies that were consulted as part of the process;
- what factors were considered;
- the rationale for the decision reached; and
- information about the parent's right to put the matter to the Local Government Ombudsman (see below).

The independent appeal panel members should be independent of the original decision making process (but are not required to be independent of the local authority) and suitably experienced (at the discretion of the local authority), to ensure a balance is achieved between meeting the needs of the parents and the local authority, and that road safety requirements are complied with and no child is placed at unnecessary risk.

Local Government Ombudsman – it is recommended that as part of this process, local authorities make it clear that there is a right of complaint to the Local Government Ombudsman, but only if complainants consider that there was a failure to comply with the procedural rules or if there are any other irregularities in the way the appeal has been handled. If the complainant considers the decision of the independent panel to be flawed on public law grounds, the complainant may also apply for judicial review.

Home to school travel and transport: flowchart of the review/appeals process



Department for Education

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London Borough of Haringey

School Travel Assistance Policy

Children and Young People up to 16 Years of Age in Compulsory Education

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1. Introduction

This document outlines the policy of the London Borough of Haringey (LBH) in relation to the provision of free school travel assistance for children and young people of compulsory school age (0-16 years old)[1]. It covers the period up until the end of the academic year in which the individual turns 16.

It gives guidance for children, young people, parents/carers[2] and schools about how the LBH fulfils its legal duties as a local authority in providing school travel arrangements for its residents.

The purpose of this policy is not to provide LBH with a blanket set of rules to apply to each application or case. The aim is to provide a framework within which the council can make decisions that are consistent and equitable, meeting the specific needs of each individual child and young person.

This document will also explain how parents and where appropriate, young people may apply for home to school travel assistance, how decisions are made, and how parents and young people may appeal against decisions that they are unhappy with.

We offer several different types of travel arrangements to assist children and young people in attending their place of learning, more of which will be explained later in this document. LB therefore used the term ‘travel assistance’, rather than ‘free school transport’.

Statutory Guidance

The principles of this policy have been developed in conjunction with advice from the Department of Education’s ‘Home to school travel and transport guidance’[3]. Local Authorities are under a duty to have regard to the guidance when carrying out their duties in relation to home to school transport, and sustainable travel.

Within the guidance, it states that the free transport that Transport for London (TFL) offer for children under the age of 16 is an acceptable form of travel assistance, as long as the needs of the child/ young person have been taken into account. We expect that this provision of travel assistance is sufficient to meet the needs of most children and young people who live in LBH.

[1] This document will use the term ‘child’ or ‘children’ throughout to refer to any person who is of compulsory school age, between 0-16 years old.
[2] This document will use the term ‘parent’ throughout to refer to a child’s legal guardian.
[3] A website link to this is available in Section 7 of this document.

1.1 LBH's principles

We are constantly evolving the way in which our school travel assistance services operate, to better suit the needs of our residents. This involves implementing changes to the service to correspond with some of the key principles we have in LBH. Our principles include ensuring the safety of children and young people, sustainability and creating a cleaner environment, and promoting the independence and life skills of children and young people.

1.2 Sustainability

We are also committed to promoting more sustainable travel methods to transport eligible children and young people from their home[4] to their place of learning. Sustainable travel means modes of travel which may improve either the physical wellbeing of those who use them, or the environmental well-being of the whole or part of the area. LBH's 'Local Implementation Plan' details the council's goals in relation to sustainable travel. More information can be found at: https://www.haringey.gov.uk/sites/haringeygovuk/files/local_plan_first_steps_presentation_transport_.pdf.

At LBH, we actively encourage children and young people to use alternative forms of travel that promote sustainability, such as walking, cycling, and using public transport to fulfil their needs. As a local authority, we are aware that these travel methods may not be suitable for all the children who are eligible for travel assistance. When these forms of travel are not suitable due to exceptional circumstances such as the child/young person having special educational needs or disability (SEND), we will provide other types of travel arrangements such as taxis and buses. Travel arrangements that are vehicle based are inherently less sustainable than walking and cycling and will only be utilised where all other suitable options are exhausted.

As a local authority we have identified several practices that can help to reduce the impact of vehicle-based travel arrangements. Such practices include but are not limited to:

- incentivising LBH providers to invest in and use greener vehicles by offering longer term contracts;
- routing vehicles in the most efficient way possible;
- devising local pick up/ drop off points to reduce vehicle distances and times;
- grouping children or young people onto buses to reduce vehicle numbers and therefore traffic congestion.

Wherever possible, Haringey will always promote the most sustainable method for a child or young person, based on their specific needs. This is a fundamental part of

[4] Refers to the registered address of child, or the address that is agreed on the child's EHCP.

how we decide on the provisions we will put in place for children and young people if their application for school travel assistance is successful.

1.3 Promoting independence

LBH are committed to providing support for eligible children and young people that enable them to develop independent travel skills that will assist them with taking part in education, employment, life, and leisure activities within their community.

It is our aim to move away from transport practices that don't encourage children to develop independence skills, such as door-to-door taxi or bus services. LBH will utilise one of the many projects that we have implemented that promote independence.

We are particularly proud of our offer in the independent and assisted travel training, aspects of which are delivered via our 'Travel Buddies' service. More information in relation to this can be found later in this document (section 3.3). This form of travel assistance has had demonstrable success in assisting in developing the skills to lead truly independent lives.

As a council, we are committed to developing the methods and practices we use that enable us to attain this key principle. We aim to do this in conjunction with parents and schools, to ensure the travel assistance we provide caters for the specific needs of the children and young people living within the borough.

1.5 Safeguarding

As a local authority, LBH are committed to ensuring the safeguarding of children and young people and this is particularly important when children and young people are receiving home to school travel assistance.

Safeguarding means protecting a person's health, wellbeing, and human rights; enabling them to live free from harm, abuse, and neglect. In most instances, the most effective way to ensure the safeguarding of a child or young person on their journey to/ from school is for their parents to provide travel arrangements for them.

Where this is not a possibility and LBH provide travel assistance, we have several ways that we ensure the safeguarding of children and young people. These include but not exhaustive to:

- all staff complete compulsory compliance checks such as Disclosure and Barring Service (DBS);
- robust processes and procedures for reporting safeguarding issues;
- travel assistance staff are trained in an accredited 'Child Protection/ Safeguarding' programme;
- stringent contractor vetting processes, including regular audits;

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- regular inspections by senior officers of the Passenger Transport Service (PTS) of the provisions we have in place for children.

1.6 Children and young people covered by this policy

This policy applies to all children and young people who are a resident[5] of the LBH.

The child/young person will also have to be:

- under compulsory school age;
- of compulsory school age (5-16) with or without SEND.

There is a separate policy regarding school travel assistance for young people who are considered 'Post 16' i.e. between the ages of 16 and 25 years old.

If a family has moved out of the LBH to another Local Authority, even temporarily, it is the responsibility of the new local authority to provide travel arrangements, even if the child or young person remains in a Haringey school.

1.7 Children under 5 years old

There is no legal requirement for local authorities to provide travel support to and from school for children under five years old. As such, LBH will not be offer travel arrangements to children under the age of 5[6], unless there are exceptional circumstances. We expect that children under the age of five are taken to school by their parent.

There are exceptional circumstances whereby LBH will provide travel assistance for a child under the age of 5. In determining this, we as the Local Authority will consider:

- if a child has SEND and the contents of any Education, Health and Care Plan (EHCP);
- if there are alternative means of facilitating the child's attendance at school;
- what alternative placements or options that may be available;
- the distance and journey time from the child's home to their place of education.
- the best use of the LBH's resources.

[5] Means that a child is registered at an address in the borough which is the child's principal residence. If the child resides equally between both parents, the principal home address will be considered to be the address at which the child is registered, whilst attending school, with their GP and, if applicable, the address of the parent who is in receipt of Child Benefit or Child Tax Credits for your child.

[6] In instances where a child turns 5 during an academic year, travel assistance will only be offered when they are in full time education.

1.8 Eligibility criteria

Statutory guidance dictates that there are instances in which a local authority must provide children with home to school travel arrangements or support. To be in receipt of this assistance from LBH, children must adhere to certain eligibility criteria. These revolve around the following:

Distance

LBH will provide transport in principle to children or young people whose distance between their home address and school is greater than the 'Statutory walking distances' (more information is available in section 3.9 of this document).

Where a school is within the statutory walking distances of a child's home address, LBH expects parent to make suitable arrangements for their child to travel to school; unless there are exceptional circumstances, such as children with SEND.

School placement

A child is only eligible to receive travel assistance from LBH if they are attending their nearest suitable[7] or qualifying[8] school.

This means that if a child attends a school on the basis of parental preference and there is a more local provision that can meet the child's needs, i.e. there is a suitable school that is closer to the child's home address, it is the responsibility of the parent to make arrangements for the child's travel to school.

The exceptions to this rule are:

a) based on religious belief. LBH respects a parents' religious and philosophical convictions in relation to their child's education and this will be considered when evaluating which schools are deemed 'suitable' or 'qualifying'.

b) a child having an EHCP, with the 'preferred' school being named in the EHCP. If a different school is named in the plan and the parent still wishes to send their child to the 'preferred' school, LBH will expect the parent to make their own travel arrangements, other than in exceptional circumstances[9].

Children of compulsory school age with SEND

LBH will make arrangements for all children who cannot reasonably be expected to either walk, cycle, or use public transport to travel to school because of the associated health and safety issues related to their SEND. This may be because a

[7] Means a school that is suited to the pupil's age, ability and aptitude and/or any special educational needs the pupil may have.
[8] Means a school maintained by a local authority (state school), a pupil referral unit, a non-maintained special school or an academy (including free schools and University or City Technical Colleges).
[9] An exceptional circumstance may be that the school named in a child's EHCP does not have any placements available, thereby forcing them to attend a different school.

child's mobility, medical and/ or behavioural needs make it challenging for parent to provide travel arrangements to assist the child's journey to and from school.

Most children in LBH with EHCPs do not require specialised travel assistance. We will assess and identify the travel requirements for each child on an individual basis and put suitable arrangements in place, where necessary. Further information can be found in the 'Haringey's decision process' part of this document (section 3.5).

Children who are looked after

For children who are looked after by LBH but not living in the borough, it is the responsibility of the local authority that the child lives in to assess their needs and provide school travel assistance, the costs of this transport may be recharged to LBH.

Children living in LBH but are looked after by a different local authority, will have their travel needs assessed and provided by LBH. (The costs of this transport may be recharged to the placing authority)

1.9 Exceptional circumstances

Although there isn't a statutory responsibility for local authorities to provide school travel arrangements outside of the remit of the criteria above, LBH recognises that there may be several circumstances that may prevent a child, or their parent, accessing their usual method of school travel. In these instances, we will endeavour to put the necessary arrangements in place. Applications for travel assistance will need to be submitted via the usual process, with more information to be found in section 2.

Families in crisis

LBH will consider applications for school travel assistance in instances where families are in 'crisis'. We define 'crisis' as a set of issues that a family encounters that prevent a parent's ability to be reasonably expected to provide school travel arrangements for their child, due of the circumstances. An example of this may be because one of the child's parents has passed away and the remaining parent is not able to escort their child to school due to having to provide care for other siblings.

In instances of a family being in 'crisis', LBH will assess the best way in which we can support the family's school travel needs. This will be assessed on a case-by-case basis, using the assessment criteria which can be found later in this document We will review the arrangements and the needs of the child on a regular basis, with LBH removing the travel assistance when the child no longer requires support.

Temporary medical conditions

LBH will consider applications for school travel assistance if a child has a temporary medical condition that means that they are unable to use the regular for of school

travel that they would normally use. In these instances, we will expect parents to have exhausted all other options for school travel prior to applying.

We will require written evidence from a medical practitioner, such as a doctor, confirming that the child is unable to use the normal method of transportation as a direct result of the medical condition.

The eligibility of this criteria will be assessed outside the parameters of statutory walking distances and if the individual is deemed eligible, the travel arrangements put in place will be based on the specific needs of the child. We will review the arrangements and the needs of the child on a regular basis, with LBH removing the travel assistance when the child no longer requires support[10].

Children with disabled parents or carers

Haringey expects parents or carers to escort or provide the necessary travel arrangements for their children in instances where they are not eligible for assistance from LBF.

This may not be appropriate for all residents within the borough, particularly in cases where a parent has a disability that may restrict their ability to accompany the child to their place of learning. In instances such as this, we will consider applications for travel assistance, even if the child is not eligible by other criteria.

We will require written evidence from a medical practitioner, such as a doctor, confirming that the parent is unable to escort/ provide travel assistance for their child due to their medical condition(s).

The council will use their discretion as to which provisions are put in place, on a case-by-case basis, using the assessment criteria which can be found later in this document (section 3.5).

[10] When the medical condition no longer prevents the child from accessing their usual form of school transport.

2. Applications

Applications for school travel assistance can be made via our website: https://eforms.secure.haringey.gov.uk/ufs/TRANSPORT_AND_TRAVEL.eb?ebd=0&ebp=10&ebz=1_1636535537036
All applications must be submitted via the website and can't be made over the telephone or via email. It is essential that applicants[11] include as much information as possible with regards to a child's condition(s) as this will allow us to provide the most suitable travel arrangements to fulfil the child's needs.

If an applicant is unable to complete the application form whatever reason, they should contact the PTS team (details in section 6) or seek assistance from their school to submit it on their behalf.

Applicants will receive a decision with regards to the outcome of their application in writing.

2.1 When is a new application required?

Applicants will need to complete a new application for a child if one of the following applies to them:

- the child has changed address;
- the child has changed the school they attend;
- the child is moving from nursery school to primary school;
- the child is moving from primary school to secondary school;
- the child is 16+ and moving to a new school or college, or remaining at the same school.

Making a new application will allow LBH to gather the most accurate information and allow us to accommodate the needs of the children more effectively.

2.2 Timescale

Although we aim to process applications as quickly as possible, parents should allow up to 30 days[12] from the date of application for a response to their application. After the acceptance of an application, a parent should allow up to ten working days from receipt of the confirmation for the travel arrangements to be put in place. If an applicant has not received an answer in this timeframe, they should contact the PTS team (details in section 6).

To reduce disruption to the service and inform effective planning, LBH are implementing cut off dates for applications. The beginning of the academic year is the most critical time with regards to school travel and we aim to promote continuity

[11] Applicants has been used in this document, as parents, carers, schools or even children can make an application for travel assistance
[12] This document uses calendar days- not working days unless stated otherwise.

in the service we provide the children. Late applications present several issues for the service in several ways, which is why a cut-off date is necessary. These issues include but are not limited to:

- other service users having to be placed on different vehicles to what they have become accustomed to in order to accommodate new children and young people;
- vehicles not being optimised to fulfil the specific needs of the children on board;
- longer journey times due to routes becoming inefficient;
- temporary overcrowding of vehicles until children and young people can be moved/ new vehicles procured.

Cut-off dates will be published well in advance on the LBH's local offer, which is available on our website. We will also correspond with parents in writing via mail/ email informing them of the exact dates.

Late applications may result in a delay in LBF providing travel arrangements for the child. We endeavour to process applications as quickly as possible, but it will likely result in travel arrangements not being in place until after the term begins. Until arrangements have been put in place, it is the parent's responsibility to provide travel assistance for their child.

The cut-off dates will not apply in cases where there are exceptional circumstances. For example, the cut-off dates will not apply to anyone whose circumstances change at any time after the published dates[13].

[13] For example, where an EHC plan is finalised and the Local Authority places the child in different school, or where the family moves home.

3. LBH's travel assistance offer

LBH considers public transport as a suitable method of transportation for most children to travel to their educational provisions. As a resident of a LBH, ALL children under the age of 16 are entitled to free travel on buses to facilitate this.
Where this option may not be suitable for a child, we operate several different schemes to provide support for children and young people to allow them to attend their place of learning. These services can be accessed upon application and only if certain criteria are met (as per section 1.9).

In instances where a child/ young person is not eligible for travel assistance and/or their application has been declined, LBH will expect them to travel to their place of learning (accompanied if necessary) using provisions in place by TfL (more information in 2.2.1).

If a child/ young person's application for school travel assistance is successful, LBH will use its discretion to offer one of three travel options, based on the specific needs of the individual. The options are as follows:

- vehicle transportation- the child will be transported by taxi or bus, most likely with other children attending the same school. More information in section 2.2.2.
- independent or assisted travel training- supported one-to-one or group training designed to equip children with the skills required to travel independently, be it on foot, or by public transport. More information in section 2.2.3.
- personal travel budget (PTB)- a PTB is a payment designed to help parents to make any of the travel arrangements needed to facilitate their child accessing school. More information in section 2.2.4.

It is down to the discretion of LBH to decide which of these options is most suited to the needs of the child, as well as the best use of Haringey's resources.
Further information about how Haringey makes their decisions can be found in section 2.3.

3.1 Transport for London (TfL) Travel Pass/ Oyster Card

In instances where a child/young person is not eligible for assistance from LBH and/ or, is capable of using and has access to public transport, LBH will expect the offer of travel assistance from Transport for London to provide sufficient support to facilitate a person's transport to school. The current offer allows children and young people of school age, up to the age of 16, free travel on buses and trams[14]. In conjunction with this, TfL offers discounted Tube, TfL Rail and National Rail Services.

[14] This is up until the end of the academic year in which the individual turns 16.

Applications or further information regarding travel passes or oyster cards can be accessed through the TfL website (www.tfl.gov.uk/).

3.2 Vehicle transportation

Provisions of travel assistance using taxis or buses will only be granted when it is deemed essential to the child or young person's needs. LBH will provide suitably qualified, registered vehicles from a commercial provider that adhere to the contractual standards that the council have set.

In a bid to reduce congestion and to make best use of council resources, children and young people will mostly travel together on communal bus routes. We will only provide individual private hire vehicles based on the assessed needs of the child.

LBH may also provide vehicular transportation if the child/young person is the only person, or a small number of children and young people, who attend a particular school or placement. This is usually the case when the child/young person attends a school out of the borough.

We will regularly review the duration of vehicle journeys, taking into consideration the route and the individual needs of the passengers on board. Statutory guidance suggests that the maximum each way length of journey for a child of primary school age to be 45 minutes and for secondary school age 75 minutes[15]. This journey time may not be suitable for every young person, for example where they have SEND and/ or has acute medical needs. LBH will assess routes on a case-by-case basis and provide additional travel assistance arrangements where necessary.

Pick-up & drop-off points

Children and young people will only be picked up from their home address if it is essential to their individual needs. In all other cases, LBH will inform the parents of a local pick up/ drop-off point. These locations are usually communal areas where we can pick up/ drop-off children. The reasons for using these are:

- to encourage and maintain independent travel for children;
- to reduce the journey times for children/ young people;
- to ensure that the route taken is the most efficient.

We offer two types of pick up & drop off points. They are:

- local pick-up & drop-off points
- home pick-up & drop-off

Local pick-up & drop-off points

This will be a safe and convenient location, close to the child/ young person's home address, within a reasonable walking distance.

[15] This is dependent on the placement the child attends. For example, if a young person attends a college that is approximately 75 minutes away, it is reasonable that the person may be on a vehicle longer than the statutory guidance, due to variances in traffic etc.

When assessing if a child/ young person will access their travel arrangements from a local collection point, LBH will consider both the child's and the parent's individual needs. This will include but not exhaustive to:

- the mobility needs of the child;
- the health needs and/ or medical conditions of the child;
- any sensory impairments of a child;
- the personal safety of the child;
- public safety;
- family circumstances.

Local pick-up points will be individually assessed for suitability and will be approved by LBH before they are used. When assessing the suitability of a local pick-up point, we will consider the following:

- if the pick-up/ drop off location is within a suitable distance of the child/young person; s home address;
- if the vehicle can access the area and can effectively allow children and young people to board the safely;
- if the location allows for the child/ young person's mobility needs e.g. wheelchair access;
- if the location is an area where there is low traffic/ pedestrian congestion e.g. avoiding busy car parks where possible;
- if the location has suitable shelter in the event of adverse weather conditions.

It is a parent's responsibility to ensure their child's safe passage to and from these locations. We therefore do not consider age a factor in determining whether a child/young person is suitable for local pick-up / drop-off points.

Home pick-up & drop-off

Where it is determined to be necessary due to a child/ young person; s needs, LBH can provide pick up and drop offs from their home address.

The parent or a responsible adult must be at the home address at the time that the child/ young person is picked up/ dropped off. We will endeavour to provide the most accurate times but variables such as traffic can affect these.

Carers with more than one child on Haringey travel assistance

We will also consider providing home pick up/ drop off where a parent has more than one child on travel provided by LBH. This is to prevent any issues arising from parents having to be at certain pick up/ drop off points at logistically challenging times.

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Pick-up/ drop-off times

Parents will be informed of approximate times that their child is to be picked-up or dropped off by the PTS team. Although we will endeavour to accommodate the individual needs of children and young people, we cannot take parental and family circumstances into account when arranging pick-up and drop-off times. Due to many of the vehicle services we operate being communal, we are unable to provide times based on parental 'preference', as we will not be able to cater for every user's needs at the same time. This would include whether a parent is unable to accompany their child to and from their pick-up & drop-off point due to work commitments.

In instances where parents are taking siblings of their child to the same, or another school, we expect parents to make suitable arrangements to ensure their child is at the collection point in the morning/ a responsible adult is available at the drop-off location in the afternoon.

Exceptional circumstances may exist and if so, we will consider the evidence provided on a case-by-case basis.

Lateness

If a parent is late in getting a child to the pick-up point or getting them ready, LBH's vehicles will wait a maximum of three minutes after arrival. After this point, the vehicle will move on to the next child that needs to be picked up. This is to ensure the smooth running of the service and to prevent any further delays for other passengers on the route.

If the vehicle has left the pick-up point due to the child being late, it is the responsibility of the parent to make their own travel arrangements to get the child to their place of learning. If the parent is able do this, LBH will be able to recommence arrangements from the afternoon collection from school.

If a LBH vehicle is running late, parents may be able to track the progress of the route by using the 'Missions' app. The App will provide parents with the current geographical location and they should therefore check the 'Missions' App prior to contacting the PTS team. For more information on the 'Missions' App or how to access it, parents people should check with the PTS team.

In instances of severe lateness, we will endeavour to notify the parents by SMS text, email, or by a phone call[16]. It is therefore pivotal that we are kept informed of the latest contact information for parents. We will also endeavour to keep schools appraised of the lateness when this occurs.

[16] This may either be from the PTS office team or the passenger attendant on board the vehicle.

Passenger assistants/ escorts

Based on the needs of the children on any given vehicle, LBH may provide a passenger assistant (PA)[17]. A PA will only be provided where it is deemed necessary for the safe operation of the vehicle and/ or care of the children and young people on board.

Factors that determine the need for an escort include but are not exhaustive to:

- the age of the child or young person.
- the medical needs of the children and young people.
- the behavioural needs based on a young person's SEND.

The needs of the passengers on board the vehicle will be assessed by a member of the PTS team.

3.3 Travel training and travel buddy scheme

LBH may decide to provide assistance in the form of travel training via our travel training and travel buddy scheme. One of our core values is to promote independence for older children and young people, with this form of travel assistance the most effective way to achieve this.

We offer two types of travel training:

- Independent travel training (ITT);
- Assisted travel training (ATT)/ travel buddy scheme.

Independent travel training (ITT) is one-to-one, or group classroom training designed to equip older children and young people who are entitled to school transport with the confidence and skills required to travel independently, be it on foot, or public transport.

Assisted Travel Training (ATT)/ travel buddy scheme is a supported travel training scheme, which involves a travel trainer accompanying the older child/ young person on their journey to school, be it on foot, or public transport. Travel buddies and trainers will work closely with school staff, parents, and children and young people to cater the travel training to the specific needs of the child.

Travel training is not only beneficial for children and young people whilst they are travelling to education, but it can also help them in many other ways. This includes such benefits as increased independence, self-esteem, access to social life, social skills, and access to job opportunities.

[17] Also referred to as an 'escort'.

We aim for older children and young people to have the same trainer throughout their training (except during leave and exceptional circumstances), and the team can offer support afterwards.

All our training programmes are accredited. For an older child/ young person to be declared ‘independent’, the individual’s travel skills are evaluated by one of our assessors. Where the older child/young person displays the necessary skills to travel safely to school independently, they will be accredited with a certificate detailing that they have successfully completed the course.

In instances where an older child/young person doesn’t exhibit the necessary skills to be independent, LBH will provide additional training, amending the teaching methods where necessary.

Once a child has been certified as independent, LBH will expect the travel assistance offer from TfL (in section 3.1) to provide sufficient support for the child’s journey to and from school.

Training delivery

Parents will be involved from the outset, starting with a meeting with the travel assessor who will work with them to tailor the program to their child’s needs. A travel trainer will accompany the applicant throughout their whole journey from home to school and vice versa, empowering them to manage every aspect of their journey independently. The program will encompass:

- personal safety;
- children finding their way;
- Green Cross Code;
- road, walking, and bus safety;
- planning a journey;
- using a bus pass and paying a fare;
- using buses, trams, & trains;
- problem solving, such as service cancellations.

The training is delivered one-to-one from a trained ‘travel buddy’. Until the older child/ young person is considered capable of completing the route on their own confidently, they will always be accompanied by a travel trainer. There will be regular assessments of progress, which will be shared with the family and school of the child/young person.

Some special schools in the borough offer their own travel training for their pupils. Parents should check with their child's school first before applying to the Passenger Transport Service.

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Eligibility

To be considered for travel training a child/young person must have the potential, once trained, to travel to and from school completely independently. Before any training takes place, we will first assess whether the older child/young person is ready for travel training on individual basis. To assess a child/young person's eligibility/ potential to travel independently, LBH will consider:

- the information on an EHCP for the child/young person, if applicable;
- information contained in the application form;
- risk assessments obtained from schools;
- route assessments by a LBH officer;
- information from key workers.

On the days where there is no travel training, for example when a travel trainer is absent due to illness, the learner will continue to use their normal mode of transport to get to school/college. Once the training is completed and the learner becomes independent, they will start to walk or use public transport as trained.

Applications should be made via the usual method, more information in section 2.1.

3.4 Personal transport budget (PTB)

A PTB is a payment designed to help parents make any of the arrangements needed to facilitate their child accessing school. Parents can use the budget in any way they wish to ensure the child attends school every day, on time, and ready to learn. Examples of how a PTB may be used include:

- contributing towards covering the costs of running a car;
- purchasing travel passes for the parent and/ or child to use public transport;
- paying for travel arrangements for an older sibling, thus allowing the parent to accompany the younger child to school[18];
- paying for childcare arrangements for a younger sibling, whilst the parent takes the older sibling to school;
- paying a PA to accompany the child to school on public transport i.e. a travel buddy;
- arrange shared travel, such as a car or taxi, sharing with another family;
- purchasing bikes for children and support climate change initiatives.

If a parent chooses to receive a PTB, LBH will consider their duty of providing school travel arrangements for eligible children fulfilled and will provide no further assistance.

PTBs are granted at the discretion of the local authority, where it is cost effective for the authority to do so. There is no automatic right to receive a PTB, in place of alternative transport assistance, which may have been offered. We reserve the right

[18] This should be considered particularly in cases for children with SEND, with this parent taking the child with SEND themselves.

to withdraw the PTB at any time. If we were to withdraw this support, LBH will provide alternative forms of travel assistance[19].

To receive a PTB, applicants must apply through the usual application form and contact PTS (details on how can be found in section 6) to state their preference for a PTB. Children must comply with the eligibility criteria detailed within this policy (more information in section 1.8) to entitled to a PTB.

The value of a PTB is dependent on numerous factors, which will be considered when determining the amount of financial support each child is entitled to. These include but are not limited to:

- the distance from the child/young person's home address and school;
- the duration of the journey from the child/young person's home address and school[20];
- school schedule i.e. the number of days the child/young person attends school;
- reasonable methods of travel (i.e. walking, bus, tram or train) based on the child's needs, and the expense associated with them;
- passenger assistant costs to act as a 'travel buddy' or trainer[21]. LBH will pay the 'London Living Wage' for this cost, for the duration of the journey only;
- fuel costs.

Formula for PTB value:
(journey time x PA cost per hour + journey cost) x journeys per day x number of days attending school per week x number of weeks per academic year = PTB value

Appendix A (on page 38) displays a diagram demonstrating an example of how a PTB is calculated.

When a parent has more than one child who are eligible for a PTB, they may be entitled to receive a PTB for each child. The values of each PTB will be determined by the above criteria, however the budget paid for the first child will also be considered when determining the value for subsequent children and young people.

PTBs are paid over the academic year (in arrears on a monthly basis unless other arrangements have been made). As a part of receiving a PTB, a child/young person's attendance record at school will be monitored and reviewed. Payments that have been made for days that they are absent will be deducted from the following

[19] Unless there are exceptional circumstances, such as those outlined in the Ceasing/ withdrawal of travel assistance (section 3.7).
[20] Journey times will be calculated using Google Maps, taking into consideration traffic or public transport variances for the time of day that a child travels.
[21] Parents may be considered to undertake this role.

month's PTB payment. If a child's attendance drops below an acceptable level without a suitable reason[22], LBH may decide to withdraw the PTB. We determine that the statutory expectation of 95% attendance to be acceptable.

If a child/young person is in receipt of a PTB and their parent believes it is no longer suitable, or not of sufficient value to fulfil their needs, they must notify LBH in writing (details can be found section 6 of this document). We will require supporting evidence as to why the PTB is no longer suitable, or of sufficient value for the parent to provide travel arrangements for the child. The case will be reviewed by a senior officer of the PTS team, who will consider:

- LBH's decision making process (outlined in section 3.5 of this document);
- the factors such as distance and journey times etc.; as outlined in this section of the document (section 3.4),
- the supporting evidence supplied by the parent.

Parents should allow for 30 calendar days to receive a response in writing. During this time, it is the parent's responsibility to provide travel arrangements for their child. If LBH determine that the parent's explanation is valid, we may:

- provide an alternative form of travel assistance, with arrangements commencing after the payment period for the most recent PTB instalment;
- increase the value of the PTB accordingly, with adjustments being made from the date of the confirmation email.

Parents who are not satisfied with the outcome of this review of their PTB should follow the procedure outlined in the Appeals section (4) of this document.

Mileage claim

In instances where a parent can provide their own travel arrangements by vehicle, they may be eligible to claim mileage. The child will have to be eligible to receive travel support as per the criteria in section 1.8).

Formula for mileage:
(Miles per journey x average vehicle miles per litre x fuel cost per litre) x number of days attending school per month = Mileage claim value

3.5 Haringey's decision process

After receiving an application, an assessment will be made as to whether the child/young person is eligible to receive travel assistance from LBH, as per the

[22] LBH will correspond with schools and parents to determine what is an 'acceptable level', based on the individual needs of the child. We will only consider unauthorised absences when determining acceptable levels of attendance.

'Eligibility Criteria' section 1.8 above. All decisions will take governmental statutory guidance and legislation into consideration.

Once a child/young person is deemed to be eligible, LBH will determine the type of travel assistance that we will provide. We will consider evidence regarding, but not limited to:

- the specific needs of the child/young person, particularly in instances where they have SEND;
- whether the child/young person is attending the nearest suitable educational establishment that fulfils their needs;
- whether there is a family member/carer who is able to transport or accompany the child/young person.
- the distance from home to school;
- the complexity of the journey from home to school;
- if the child/ young person can become an independent traveller;
- the best use of Haringey's resources.

To ascertain all of this information, we rely on a number of sources. These include:

- the information within a child's EHCP, if applicable;
- information contained in the application form;
- risk assessments obtained from schools;
- route assessments by a PTS officer;
- information from passenger attendant/ escorts;
- information from key workers.

As such, it is essential that information about a child/ young person's medical needs, ways of communicating with people, particular likes and dislikes or fears (such as loud noises etc.) are included in their application.

As an example, a particular child is a wheelchair user. As a result of being informed of this, LBH can plan to put provisions in place that reduce the impact of this on the child's journey. If the child is receiving travel training, we will take this information into account to ensure the public transport routes they use are accessible.

A diagram of the decision process can be seen in Appendix B (on page 39).

3.6 Travel assistance reviews

LBH reserves the right to review the type of travel assistance that a child/young person receives. Typically, this will be assessed annually but there are some circumstances that may result in transport arrangements being reviewed. These include but not exhaustive to:

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- a child/young person transitioning from one school to another (nursery to primary, primary to secondary and after the child or young person is over 16 years old);
- a child/young person's home address changing;
- a change in the child/young person's needs;
- an incident occurring on the current travel arrangements[23], necessitating the need for a change in the type of travel assistance provided.

In all the above examples, it is the parent or carer's responsibility to re-apply for transport and/or notify LBH of the change in circumstances. Failure to inform the PTS team of any changes may cause delays with the provision of transport for the child/young person being put in place, or potentially withdrawn.

The results of a review will be implemented at a convenient time of the academic year, such as the beginning of the school term. In instances where a child/young person is moving home, the new arrangements will be made as soon as reasonably practicable.

3.7 Ceasing/ withdrawal of travel assistance

Outside of the outcome of a review there may be various reasons why a child/young person's travel provisions may be withdrawn. These reasons may include but are not restricted to:

- if it is proven that travel assistance was obtained on the basis of fraudulent or misleading information;
- a child/ young person's behaviour is in contradiction to the behavioural standards (more information can be found in section 5.1 of this document) and is so severe that travel arrangements are withdrawn. This is assessed on an individual basis, taking into consideration the specific behaviours a child's SEND.

3.8 Transport times

LBH will provide travel assistance to and from school at the beginning and end of each day. This will be at 'regular' school times, as determined by the school schedule. This ensures that we; as the local authority, will have the necessary resources available at the specific times that travel assistance are required.
LBH appreciates that a child/ young person's educational programme may differ to 'conventional' school timetables, especially in the case of children and young people with SEND. In exceptional circumstances, we will put provisions in place. An example of one of these circumstances would be if a differing timetable were to be named as part of a child/young person's EHCP.

[23] Such as an incident that that has led to a temporary suspension from transport.

Prior to LBH providing of travel assistance for a child/young person, we will inform parents of the schedule around which those arrangements will be made. For example, a child/young person will be given travel assistance in the mornings only if finish school earlier than the 'regular' school closing time.

Breakfast/ after school clubs

LBH do not provide travel arrangements outside of regular school times and do not provide transport for non-statutory school activities, such as breakfast clubs. In these circumstances, it remains the parent's responsibility[24] to provide travel assistance for the child.

There are various reasons why travel assistance isn't provided outside of the 'regular' school times. These include but are not exhaustive to:

- a PA being allocated to the route and this resource not being able to accommodate the different times;
- a child/young person being allocated to a route with other passengers who do not attend the same club;
- breakfast/ after school clubs not being at the same location as the school;
- club times being inconsistent e.g. a club finishing at 4pm one day and 5pm the next.

LBH will only consider providing travel arrangements for breakfast/ after school clubs where it is logistically viable. An example of this would be where all the children who are allocated to a particular vehicle all attend the same after school club, and the travel providers and PA are able to accommodate the change in times. It is down to the discretion of LBH whether we will provide travel assistance for breakfast/ after school clubs.

Residential schools

Where a child/young person is attending a residential school, LBH will only provide travel assistance:

- at the beginning of the week;
- at the end of the week;
- at the start of half term/ term
- at the end of half term/ term
- in cases of emergency, with what constitutes an 'emergency' being at the discretion of LBH.

We will not provide travel arrangements for parents or families to visit the school. If parents wish to visit (including the first day of school), they must make their own arrangements or contact the school.

[24] In some instances, schools provide their own transport for these activities. Parents should check with their school prior to contacting LBH regarding this.

Additional journeys

LBH's transport providers are only permitted to provide travel assistance for children in the following instances, unless authorised by an officer in the PTS team:

- a journey from a child's designated pick-up point to their school;
- a journey from a child's school to their designated drop off point;
- on journeys as per the child's school schedule, as agreed by LBH.

We will not provide travel arrangements for:

- school trips;
- medical appointments;
- work experience or work placements;
- early collections from school due to a child/ young person's illness;
- visits to other school locations away from the pre-agreed school placement location;
- sports facilities.

Where pupils have more than one address, home to school travel assistance will be provided to and from the residence where the pupil is habitually and normally resident.

3.9 Statutory walking distances

To promote the travel arrangement ideals of the LBH, children will be expected to walk; where possible, if their residence is within the following distances from their school:

- 2 miles for children under the age of 8 years old;
- 3 miles for children or young people over the age of 8 years old.

In summary, any child living a distance further than the above will have school travel assistance provided by LBH, providing that the eligibility criteria are met.

How do we measure distance?

The distance is measured using online mapping tools, which measure the actual distance travelled (not a straight line or 'as the crow flies'). This will account for a 'reasonable' and 'suitable' route that the child/young person could take to travel to school.

Children with SEND

Statutory guidance dictates that statutory walking distances should not be considered when assessing the transport needs of children and young people eligible due to SEND.

LBH therefore do not consider this when determining the outcome of applications involving a child/young person with SEND.

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3.10 What to do if a child/young person's arrangements aren't suitable?

If a parent feels that the arrangements for their children are not suitable, they should email PTS at school.transport@haringey.gov.uk; stating the reasons that they are not suitable and provide any supporting evidence for this..

They can also follow the 'Appeals' procedure outline in section 4.

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4. Appealing a decision

A parent has the right to appeal decisions that LBH make surrounding their child's travel assistance arrangements. Reasons for parents to appeal may include but not exhaustive to:

- when an application for travel assistance is refused;
- when LBH proposes arrangements for travel assistance that the parent does not agree to;
- when LBH changes the existing travel assistance arrangements for a child that a parent does not agree to.

The appeal process has two stages. Stage one will the look at the original decision and assess whether it had the correct outcome. If a parent is still not happy with the decision of the stage one appeal, they have the right to proceed with a stage two appeal.

Appendix C (on page 40) displays a flow diagram showing the appeals process.

Each stage of the appeal will assess:

- the nature of the decision reached;
- how the review was conducted (including the standards followed e.g. Road Safety GB);
- information about other departments and/or agencies that were consulted as part of the process;
- what factors were considered in the decision;
- the rationale for the decision reached.

4.1 Stage one appeal

A stage one appeal must be submitted in writing within 20 **days** of the letter or email refusing travel assistance or proposing changes to existing arrangements. Stage one appeals must be sent to:

School Travel Assistance Appeal,
Special Education Needs,
London Borough of Haringey,
2nd Floor, Alexandra House,
10 Station Road, London,
N22 7TR
or by email to: appeals@Haringey.gov.uk

This appeal will be reviewed by a senior officer within the SEND team at LBH, who were not involved in the original decision. It should contain:

- the reasons why the parent believes the decision should be reviewed;
- any details of supplementary evidence or reasoning that the parent believes should be considered when the decision is reviewed.

After the appeal has been reviewed, the outcome may be to:

- uphold the appeal, or;
- not uphold the appeal and continue to refuse travel assistance.

The person appealing will be informed of the stage one decision in writing within 20 days of receipt of the appeal.

If a parent is not satisfied with the outcome of the stage one appeal, they can proceed with a Stage Two appeal.

4.2 Stage two appeal

A parent has 20 days from receipt of LBH's decision of the stage one appeal to escalate the appeal to stage two. This must be submitted in writing to:

School Travel Assistance Appeal,
Special Education Needs,
London Borough of Haringey,
2nd Floor, Alexandra House,
10 Station Road, London,
N22 7TR
or by email to: appeals@Haringey.gov.uk

The appeal must be submitted in writing and must include the reasons for challenging the decision of the stage one appeal. It should include any new evidence or documentation that has become available.

Within 60 days of receipt of the parent's request, an independent appeal panel will consider written and/ or verbal representations from both the parent and the officers involved in the case. The person appealing will be provided with a detailed written notification of the outcome of the stage two appeal, within 5 working days of the panel convening.

The outcome of Stage two appeals are final and there is no further right to appeal.

4.3 Ombudsman

If a parent believes that the LBH has failed to follow correct procedures, or if there were any irregularities in the way the appeal has been handled, they have the right to complain to the Local Government Ombudsman.

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The Local Government Ombudsman's contact details are:

- 0300 061 0614
- www.lgo.org.uk

If the parent considers the decision of the independent panel to be flawed on public law grounds, the complainant may also apply for judicial review.

4.4 Important appeals information

During the appeals process, the following will apply:

- no travel assistance will be provided;
- no changes to existence arrangements will be implemented.

Parents are responsible for providing travel assistance for their child until the outcome of the appeal has been determined.

4.5 Complaints

If parents wish to make a complaint about the level of service they have received regarding their child's school travel arrangements, they can submit a complaint via the council's dedicated webpage:

https://www.haringey.gov.uk/contact/council-feedback/make-complaint

They can also complain in writing to the following address:

Head of Service, Integrated SEND
Special Education Needs,
London Borough of Haringey,
2nd Floor, Alexandra House,
10 Station Road, London,
N22 7TR

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5. General information

5.1 Behavioural standards

As a local authority, it is not LBH's intention to enforce a 'Code of Conduct' for children and young people accessing home to school travel assistance. Children and young people interact differently with the types of arrangements we provide, particularly in instances where a child/ young person has SEND. We therefore aim to encourage children and young people to adhere to a set of principles to keep behavioural standards consistent, as well as ensuring the safety of all the people involved.

Principles

Although we acknowledge the need to consider a child's needs and circumstances into consideration, there are several principles that must be always adhered to. Once on the vehicle, children must:

- remain in their seat at all times;
- wear their seat belts at all times;
- follow the instructions of the PA and/or driver (where applicable).

We ask that service users do not:

- be verbally abusive to drivers, PAs, other passengers or any other member of the public whilst in or around the vehicle;
- behave in a way that may create danger to themselves or other passengers;
- cause damage to the vehicle itself;
- abscond from the vehicle;
- eat or drink on the vehicle, unless there are exceptional circumstances[25]
- use mobile devices to take pictures or video recordings whilst in or around the vehicle[26];
- exhibit behaviour of a sexual nature;
- spit at or fight with other service users.

For children and young people with SEND

LBH understands that children and young people with SEND may experience challenging behaviours because of their condition(s).

When LBH experiences an incident or an exhibition of challenging behaviour on the travel arrangements we provide, we will work closely with parents and schools to gather more information into their child's specific needs and how our service can meet them.

[25] This is for health and safety reasons. We must be informed by a parent or carer of any reasons why a service user needs to eat on the vehicle. This may include medical or religious reasons.
[26] This is for the safeguarding of other passengers.

We may contact schools to obtain 'Behavioural, Sensory and Communication' profiles for the child/young person, as well as asking parents for their assessment of their child's needs in the form of a 'One Page Profile'. An officer of the PTS team will contact the relevant party i.e. the parent or school, to provide the information where necessary. Both profiles will enable us to cater to the specific needs of the child and prevent further incidents from occurring in the future.

If a child/young person is still experiencing behavioural issues whilst using the travel assistance we provide, a risk assessment may be conducted by an officer of the PTS team to determine what other provisions may be necessary to allow safe travel of all the parties involved.

Outcome of principle rule breaks

It is the responsibility of LBH to ensure that all children and young people who are provided with travel assistance get to their place of learning safely. Behaviour that doesn't conform with the principles in section 5.1. may affect the safety of other children, drivers, and PAs. Poor behaviour of children and young people on transport can cause distress to others, preventing them from arriving at school in a good state of mind and ready to learn.

Incidents of misbehaviour or principle rule breaks will be fully investigated by a member of the PTS team. When determining the outcome of an investigation, LBH will consider:

- any SEND a child/ young person may have and how this may affect their behaviour;
- reports and testimony from drivers, PAs, other passengers, and/ or members of the public who witnessed the incident;
- evidence submitted by parents;
- evidence submitted by schools.

Persistent principle rule breaks or exhibitions of extreme behaviour may result in:

- a warning. We will inform the child's parent and school of the incident that has occurred and ask for them to reinforce the 'Behavioural Principles' of LBH with the individual.
- a temporary/ fixed period exclusion from transport[27]. This will allow LBH the time to arrange for the necessary provisions to be put in place to ensure the safe travel of the individual, other passengers, PAs and drivers. We may need to arrange for additional resources, such as a one-to-one PA or additional safety equipment for the child/young person during transit, which may take time to put in place.
- a permanent exclusion from transport. This will only be in cases of extreme behaviour once all other avenues have been exhausted.

[27] Guidance from the Department for Education states that non-provision of transport during periods of exclusion on behavioural grounds does not mean that LBH is failing in its statutory duties.

It is the aim of the PTS team to facilitate the learning of all eligible children and young people, and we will consider suspensions only when it is necessary for the health and safety of all the individuals involved.
Prior to any of the outcomes of principle rule breaks being enforced, LBH will consult with the parents and the school of the child to:

- inform them of the decision that was reached;
- explain how decision was reached;
- explain how the decision affects their child's school travel arrangements going forward.

Parents/ carers will be responsible for transporting their own children during any period of exclusion from transport.

5.2 Parental/ carer responsibilities

Overall responsibility for a child/young person's attendance at school is that of the parent. LBH will endeavour to make travel arrangements for eligible children and young people that are suitable not only for the child/young person, but parents and schools alike. Despite this, we cannot change travel arrangements to suit a parent's work schedule. Parents are expected to make other suitable arrangements for someone else to accompany their children as necessary.

In the instances that LBH do provide travel arrangements for a child/young person, it is the responsibility of the parent(s) to ensure:

- their child is at the 'pick up point' or ready to be collected from home at the allocated time in the morning;
- a responsible adult is at the drop off point or home of their child at the end of the day at the allocated time;
- their child is brought to the vehicle and parents assist LBH staff with placing them on the vehicle;
- the PTS team is provided with the correct and up-to-date contact information and addresses;
- the PTS is informed, in writing, if there is a change to the 'regular' person collecting their child from the drop-off point[28].
- they re-apply for transport and/or notify LBH of the change in circumstances (please see the 'Applications' section 2 for more details);
- the PTS team are informed as soon as possible if their child is sick or unable to attend school for whatever reason. Contact information can be found in section 6;
- the child behaves in accordance with the 'Behavioural standards' of LBH school travel assistance policy (details in section 5.1).

[28] Without confirmation in writing, Haringey *WON'T* allow the child to be handed over. This is for the safety of the children.

- they treat all members of the school travel assistance team with courtesy. This includes but is not limited to office staff, PAs, travel buddies and/or drivers.
-

LBH do not deem it sufficient for parents to inform a PA, travel buddy or driver of any changes in circumstances, such as home address or contact information. We require formal correspondence to put the necessary arrangements in place.

Parents failing to meet the above consistently may result in the child's eligibility for travel assistance to be reviewed and/or suspended until suitable measures can be put in place.

Failure to attend home/ collection point

In instances where a parent is not at home or the pick-up/ drop-off point at the designated time to collect their child, the vehicle will wait three minutes from the arrival time. If the parent doesn't arrive, the vehicle will drop the other passengers on board the vehicle off and after this, attempt to drop-off their child again. In the interim, our office and/or the PA will attempt to contact the parent. It is therefore important that the PTS are provided with the latest contact information for parents.

If a parent or responsible adult is still not at the pick-up/drop-off point after this final attempt, the child will be taken to a point of safety, such as a police station.

The parent is responsible for collecting their child from this location and are liable for any associated costs.

Persistent failure of a parent to be at the pick-up/ drop-off point or home, may result in the suspension of travel arrangements for the child until there is a resolution to the issue.

5.3 Adverse Weather

LBH will endeavour to reduce the impact that adverse weather may have on the service but in the event of severe weather conditions such as snow, storms, and/ or flooding, we may:

- inform the parent that the 'regular' service the child is allocated to may be delayed;
- change the vehicle the child is allocated to;
- change the PAs/ drivers allocated to the vehicle;
- change the type travel arrangements in place for a child;
- cancel the travel arrangements in place for a child.

Parents will be informed as soon as possible by an officer of the PTS team when either of these occur.

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We will only cancel travel arrangements when it is deemed necessary to guarantee the health and safe of the passengers, PAs and, drivers on the vehicle. If parents have been advised that travel arrangements have been cancelled for their child's morning journey, LBH cannot guarantee that arrangements will be in place for the afternoon journey.

Parents who have chosen to take their children to school themselves during severe weather conditions, should ensure that they have confirmed return transport arrangements for the return journey for their child before leaving them at school on that day.

5.4 Medication

Members of transport staff, such as PAs and drivers, are not permitted to carry or administer medication, or to replace medical accessories (for example, gastrostomy or tracheotomy tubes) on board vehicles. There is no statutory duty for agents of LBH to administer medication whilst on school travel assistance.

We do expect PAs and/ or drivers to promote the health and safety of all of the service users in their care.

All members of the PA team have received accredited emergency first aid training. This is refreshed within the designated timescales, or where it is deemed necessary by the PTS team. This training covers a wide range of topics, including but not exhaustive to:

- cardiopulmonary resuscitation (CPR);
- managing an emergency;
- general injuries e.g. cuts;
- dealing with instances of choking;
- identification and management of seizures;
- dealing with an unresponsive person;
- managing symptoms of shock;
- choking.

As a part of their application for transport, a parent is required to provide LBH of any information regarding the medical needs of the child. It is vital that this is done to ensure that we accommodate the needs of every eligible child accessing school travel assistance. For the safety of the passenger, failure to provide the requested information may result in a delays in provisions being put in place and/ or temporary withdrawal of travel assistance services until the required information is obtained.

What happens in the event of a medical emergency?

In the event of an emergency, the protocol is for PAs and/ or drivers to contact emergency services by calling 999. They are expected to ask for a paramedic crew to attend the location of the incident and follow any of the guidance given by the medical professionals on the call.

By parents providing us with the most recent information pertaining to their child's medical conditions, we are able relay the correct information to attending paramedics.

It is for parents to decide whether they wish for their child to travel on these terms.

Children/ young people with complex or acute medical needs

Where a child/young person has complex or acute medical needs that the existing PA team are not trained or qualified to deal with, LBH will seek to provide a medically trained professional to accompany them for the duration of their school journey.

LBH will assess whether a child/young person will require any extra provisions to be put in place in order for them to travel safely to school, such as a specialist nurse. In order to determine the needs of the child/young person, we will:

- consult their EHC plan;
- use information contained within the application for travel assistance;
- risk assessments conducted by PTS officials;
- consult with the child/young person's school about their needs;
- correspondence with the parents.

If a child/young person already has specialist care in place to accommodate their needs, parents should let the PTS team know of these arrangements. We may be able to organise for these carers to accompany the child/young person on their journey, at the council's expense, thus allowing for continuity for the child/young person.

5.5 COVID-19

Young people and parents should follow public health advice on when to self-isolate and what to do. National and local guidance is subject to change therefore current guidance at the time will apply.

If a child or young person develops COVID-19 symptoms, however mild, while at school, they will be sent home. LBH will not be able to provide travel arrangements in these circumstances. They should avoid using public transport and, wherever possible, be collected by a member of their family or household. In exceptional circumstances, if parents cannot arrange to have their child collected, and it is age-appropriate and safe to do so, the child/young person should walk, cycle or scoot home. If this is not possible, alternative arrangements may need to be organised by the school.

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What is transport doing to stop the spread of COVID-19?

In order to combat the spread of COVID-19, LBH has adopted a number of measures. These include but not exhaustive to:

- PAs and drivers wearing the appropriate PPE, such as gloves and face masks;
- PAs and drivers testing regularly, even if they are not displaying any symptoms;
- vehicles cleaned regularly, in particularly when a positive case has been on a vehicle;
- windows opened when possible, to allow the vehicle to be properly ventilated;
- passenger attendants conducting vehicle pre-admittance checks with children/young people and parents.
- encourage passengers to wear facemasks and other PPE. We understand that this may not be possible for all passengers due to exemptions.

Things to consider

The safety of passengers is main priority of the PTS team. However, in order to provide the necessary arrangements for the numbers of children and young people requiring school travel assistance, we have to group passengers together on communal buses. As described above (section 5.5), there are measures we are putting in place as a local authority to reduce the spread of COVID-19, but there is an inherent risk involved with these sorts of travel arrangements.

Consequently, parents may wish to make their own travel arrangements for their children, using a personal travel budget to support this (more information in section 3.4). This is the safest way for a child/young person to travel to school. In instances where a young person is already receiving travel assistance from LBH i.e. by taxi, bus, or travel training, but wish to be allocated a PTB instead, it is down to the discretion of the council to determine whether the individual will be allocated a PTB, based on the best use of LBH's resources.

We do acknowledge that this is not possible for all parents, and in this case, LBH will arrange for travel assistance for those who are eligible. We will endeavour to reduce the risk of COVID-19 to children as much as possible but cannot guarantee their safety in this regard. It is for parents to decide whether they wish for their child/young person to travel on these terms.

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6 Contact Information

Passenger Transport Service (PTS)
Alexandra House - 2nd Floor
10 Station Road
Wood Green
N22 7TR

Email: school.transport@haringey.gov.uk

Contact names and numbers:

Matthew Fisk, *Transport Manager*:	0208 489 2729
Ricky Morris, *Passenger Assistant Coordinator*:	0208 489 6937
Pembe Hippolyte, *Assistant Passenger Assistant Coordinator*:	0208 489 5629
Ilhan Abdurrahmanoglu, *Travel Buddy Coordinator*:	0208 489 1729
Joseph Willis, *Assistant Travel Buddy Coordinator*:	
Vivienne Austin, *Passenger Liaison Officer*:	0208 489 4376
Kathleen Johnston, *Charge Person*:	0208 489 5692

Please note that general enquiries should try to avoid calling at peak times such as 07.00am-am 09.00and 2.30pm-4.00pm. If a query is urgent, the PTS team will endeavour to respond as soon as possible.

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7 Links

Haringey local offer for young people with SEND 0-25

https://www.haringey.gov.uk/children-and-families/local-offer/5-15-year-olds/school-transport

Haringey application page

https://eforms.secure.haringey.gov.uk/ufs/TRANSPORT_AND_TRAVEL.eb?ebd=0&ebp=10&ebz=1_1636535537036

D of E guidance on home to school travel assistance for children

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/575323/Home_to_school_travel_and_transport_guidance.pdf

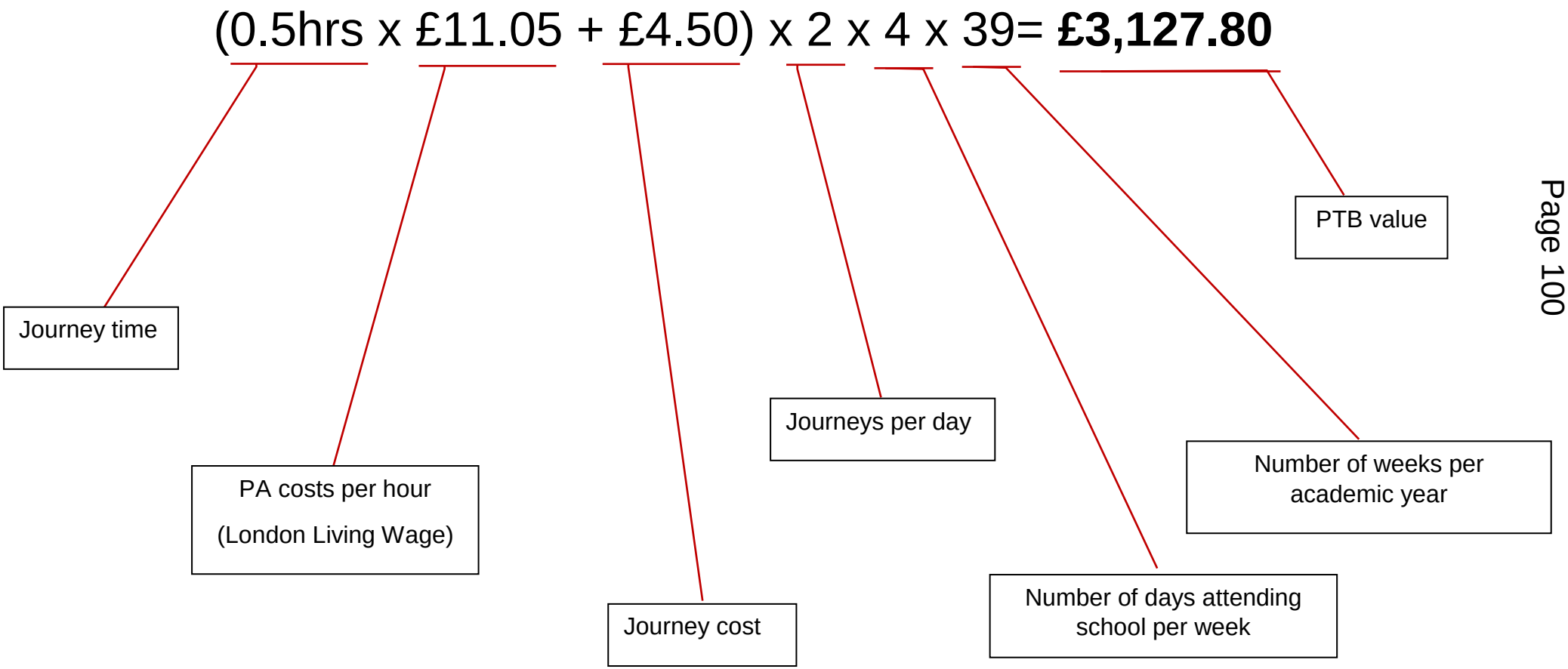
Care act guidance

https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance

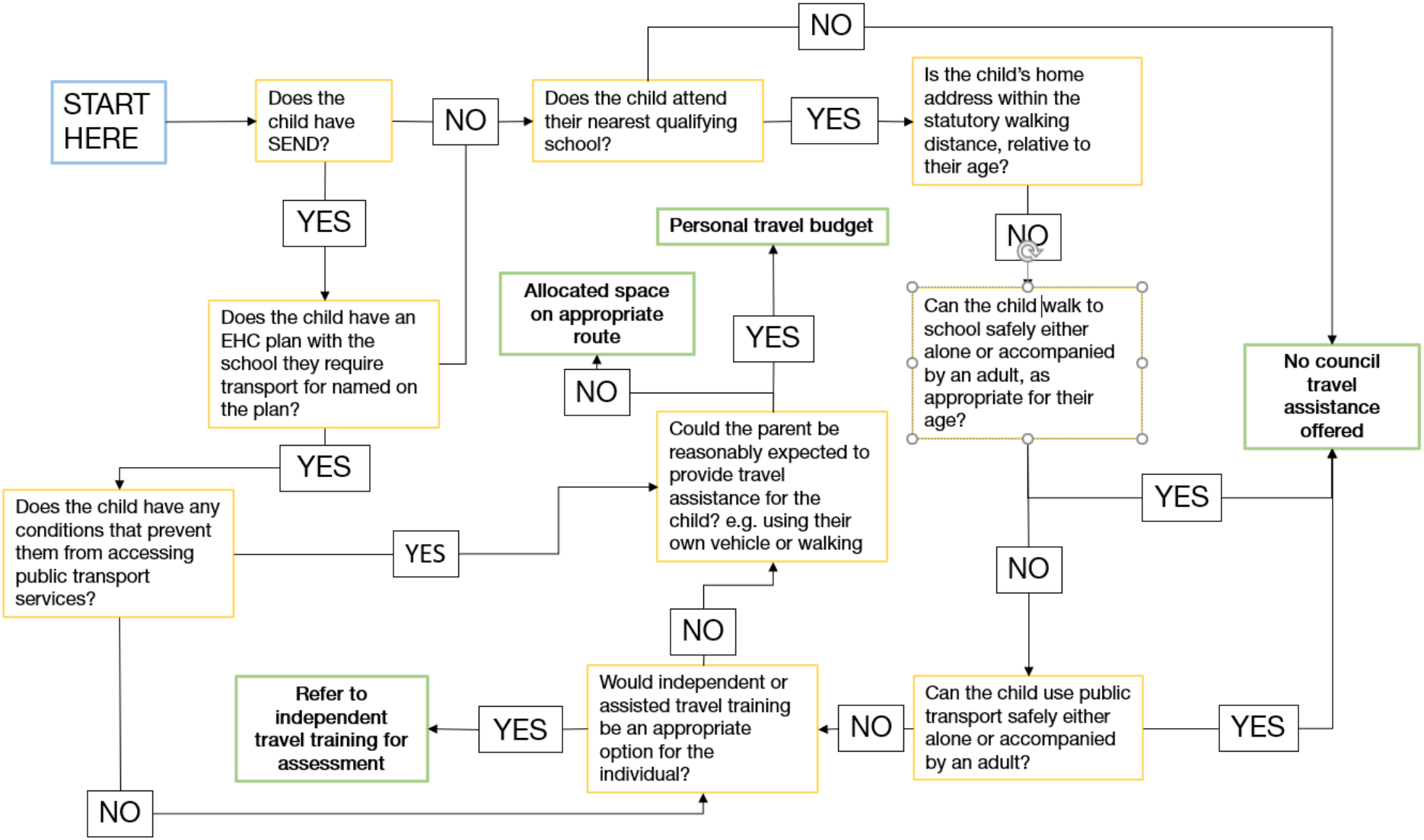
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8.1 Appendix A

Scenario: the duration of a child's journey to school is 30 minutes. They travel with a PA and use the train to get to school (which costs £1.50 for the child and £3 for the PA per journey). The young person attends school 4 days per week, 39 weeks per year.



8.2 Appendix B



8.3 Appendix C

LBH officer declines the school travel application or offers travel arrangements that the parent considers 'unsuitable'.

Parent challenges the decision (within 20 days)
Parent challenges the decision of LBH's officer in writing on the grounds of:
- Entitlement
- Distance measurement
- Route safety
- Consideration of exceptional circumstances

Stage 1 (within 20 days): Review by a senior office at LBH
Senior officer reviews the original decision and sends parent written confirmation of their decision, detailing:
- Reasoning for the decision made
- Notification of option to escalate to a stage 2 appeal

Appeal upheld
Travel arrangements will be put in place for the child/young person.

Parent challenges the Stage 1 Decision
Parent challenges the decision of the Stage 1 appeal in writing.

Stage 2 (within 60 days): Review by an appeal panel
An independent panel (of which the officers involved in the previous two appeals must not be a part of) hears written/ verbal evidence from parent, outlining why the decision of the Stage 1 appeal was incorrect.

Independent appeal panel send decision in writing to parent or carer (5 working days)

Appeal declined
The original decision is supported and travel arrangements will not be put in place. This will include details of how to escalate the case to the Local Government Ombudsman

Appeal upheld
Travel arrangements will be put in place for the child/ young person.

London Borough of Haringey

Post-16 School Travel Assistance Policy

Young People Post 16 Years of Age

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1. Introduction

This document outlines the policy of the London Borough of Haringey (LBH) in relation to the provision of school travel assistance for young people between the ages of 16 and 25[1]. It covers the period after a young person has completed their compulsory education in instances where they have turned 16 years old within the academic year.

It gives guidance for young people, parents/carers[2] and schools about how the LBH fulfils its legal duty as a local authority in providing school travel arrangements for its residents.

Local authorities do not have to provide free or subsidised post-16[3] travel support. This policy fulfils LBH's duty to prepare and publish an annual travel policy statement specifying the arrangements for the provision of transport, or other support that the authority considers it necessary to make to facilitate the attendance of all persons of sixth form age receiving education or training.

All young people carrying on their education post-16 must reapply for travel assistance. 'Sixth form age' refers to those young people who are over 16 years of age but under 19 or continuing learners who started their programme of learning before their 19th birthday (years 12,13,14).

Local authorities also have a duty to encourage, enable and assist young people with special educational needs or disability (SEND) to participate in education and training[4], up to the age of 25.

The purpose of this policy is not to provide LBH with a blanket set of rules to apply to each application or case. The aim is to provide a framework within which the council can make decisions that are consistent and equitable, meeting the specific needs of each young person.

This document will also explain how parents and where appropriate, young people may apply for home to school travel assistance, how decisions are made, and how parents may appeal against decisions that they are unhappy with.

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[1] This document will use the term 'young person' or 'young people' throughout to refer to any person between 16-25 years old.
[2] This document will use the term 'parent' throughout to refer to a young person's legal guardian.
[3] This policy uses the term 'Post 16' to include both learners of sixth form age and those with learning difficulties / disabilities up to the age of 25.
[4] Education or training refers to learning or training at a school, further education institution, a council maintained or assisted institution providing higher or further education, an establishment funded directly by the Education Skills Funding Agency, learning providers delivering accredited programmes of learning which lead to positive outcomes and are funded by the council, for example, colleges, charities and private learning providers.

We offer several different types of travel arrangements to assist young people in attending their place of learning, more of which will be explained later in this document. LBH therefore used the term 'travel assistance', rather than 'school transport'.

Statutory Guidance

The principles of this policy have been developed in conjunction with advice from the Department of Education's 'Post-16 transport and travel support to education and training'[5]. Local Authorities are under a duty to have regard to the guidance when carrying out their duties in relation to home to school transport, and sustainable travel.

Within the guidance, it states that the free transport that Transport for London (TfL) offer for young people is an acceptable form of travel assistance, as long as the needs of the young person has been taken into account. We expect that this provision of travel assistance is sufficient to meet the needs of most young people who live in LBH.

1.1 LBH principles

We are constantly evolving the way in which our travel assistance services operate, to better suit the needs of our residents. This involves implementing changes to the service to correspond with some of the key principles we have in LBH. Our principles include ensuring the safety of children and young people, sustainability and creating a cleaner environment, and promoting the independence and life skills of children and young people.

1.2 Sustainability

We are also committed to promoting more sustainable travel methods to transport eligible young people from their home[6] to their place of learning. Sustainable travel means modes of travel which may improve either the physical wellbeing of those who use them, or the environmental well-being of the whole or part of the area. LBH's 'Local Implementation Plan' details the council's goals in relation to sustainable travel. More information can be found at: https://www.haringey.gov.uk/sites/haringeygovuk/files/local_plan_first_steps_presentation_transport_.pdf.

At LBH, we actively encourage young people to use alternative forms of travel that promote sustainability, such as walking, cycling, and using public transport to fulfil their needs. As a local authority, we are aware that these travel methods may not be suitable for all the residents of LBH who are eligible. When these forms of travel are

[5] A website link to this is available in Section 10 of this document.
[6] Refers to the registered address of child, or the address that is agreed on the child's EHCP.

not suitable due to exceptional circumstances such as the young person having special educational needs or disability (SEND) etc., we will provide other types of travel arrangements such as taxis and buses. Travel arrangements that are vehicle based are inherently less sustainable than walking and cycling and will only be utilised where all other suitable options are exhausted.

As a local authority we have identified several practices that can help to reduce the impact of vehicle-based travel arrangements. Such practices include but are not limited to:

- incentivising LBH providers to invest in and use greener vehicles by offering longer term contracts;
- routing vehicles in the most efficient way possible;
- devising local pick up/ drop off points to reduce vehicle distances and times;
- grouping children or young people onto buses to reduce vehicle numbers and therefore traffic congestion.

Wherever possible, Haringey will always promote the most sustainable method for a young person, based on their specific needs. This is a fundamental part of how we decide on the provisions we will put in place for young people if their application for school travel assistance is successful.

1.3 Promoting independence

LBH are committed to providing support for eligible young people that enable them to develop independent travel skills that will assist them with taking part in education, employment, life, and leisure activities within their community.

It is our aim to move away from transport practices that don't encourage young people to develop independence skills, such as door-to-door taxi or bus services. LBH will utilise one of the many projects that we have implemented that promote independence.

We are particularly proud of our offer in the independent and assisted travel training, aspects of which are delivered via our 'Travel Buddies' service. More information in relation to this can be found later in this document (section 6.3). This form of travel assistance has had demonstrable success in assisting in developing the skills to lead truly independent lives.

As a council, we are committed to developing the methods and practices we use that enable us to attain this key principle. We aim to do this in conjunction with young people, parents, and schools[7], to ensure the travel assistance we provide caters for the specific needs of the young people living within the borough.

[7] When this document uses the word 'school(s)' it is referring a young person's educational provide, up to Level 3.

1.4 Safeguarding

As a local authority, LBH are committed to safeguarding and this is particularly prevalent when young people are receiving home to school travel assistance.

Safeguarding means protecting a person's health, wellbeing, and human rights; enabling them to live free from harm, abuse, and neglect. In most instances, the most effective way to ensure the safeguarding of a child on their journey to/ from school is for their parents to provide travel arrangements for them.

Where this is not a possibility and LBH provide travel assistance, we have several ways that we ensure the safeguarding of young person. These include but not exhaustive to:

- all staff complete compulsory compliance checks such as Disclosure and Barring Service (DBS);
- robust processes and procedures for reporting safeguarding issues;
- travel assistance staff are trained in an accredited 'Child Protection/ Safeguarding' programme;
- stringent contractor vetting processes, including regular audits;
- regular inspections by senior officers of the Passenger Transport Service (PTS) of the provisions we have in place for children and young people.

1.5 Young people are covered by this policy

This policy applies to all young people who are a resident[8] of the LBH.

The young person will also have to be:

- Over the age of 16 with or without SEND;
- Between ages of 16 and 25 and have an Education, Health and Care Plan (EHCP).

If a family has moved out of the LBH to another Local Authority, even temporarily, it is the responsibility of the new local authority to provide travel arrangements, even if the young person remains in a Haringey school/post 16 provision.

2. Concessionary tickets for young people 16 – 25 from public transport providers

[8] Means that a child is registered at an address in the borough which is the child's principal residence. If the child resides equally between both parents, the principal home address will be considered to be the address at which the child is registered, whilst attending school, with their GP and, if applicable, the address of the parent who is in receipt of Child Benefit or Child Tax Credits for your child.

LBH will expect the offer of travel assistance from TfL to provide sufficient support to facilitate most young people's need in attending post-16 education, unless in exceptional circumstances[9]. Details of these offers can be found below.

2.1 Transport for London(TfL) – free and discounted travel

TfL offer several free or discounted schemes which can fulfil an individual's travel needs. It is the responsibility of the young person or parent to ensure they:

- obtain the appropriate Oyster card prior to starting their post-16 educational programme;
- meet the requirements set by TfL for retaining an Oyster card.

For further details on these options, young people can visit the TfL website (www.tfl.gov.uk).

16+ Oyster photocard

As a part of being a resident of LBH, young people aged between 16 and 18 may obtain a 16+ Oyster photo card if either:

- they are in full-time education'
- they are on a work-based learning scheme of at least 12 hours per week (including apprenticeships).

The 16+ Oyster photo card provide young people who are eligible with:

- free travel on London buses and trams;
- half adult rate Oyster single fares on the tube, DLR, London Overground and some national rail services;
- Child rate travel card season tickets on the tube, DLR, London Overground and some national rail services.

As a part of being a resident of LBH, young people can apply for an Apprentice Oyster photocard if they:

- are aged 18 or over;
- live in a London borough
- are enrolled on an apprenticeship with a further education college or training organisation (funded or approved by the Education and Skills Funding Agency) for a minimum of 12 months;
- are in the first 12 months of your apprenticeship,
- started your apprenticeship and not on a planned break from your learning.

The Apprentice Oyster photocard gives a 30% discount on bus, tram, tube, DLR, London Overground, and national rail travel season tickets.

[9] Such as in instances where a young person has SEND/ an EHCP.

18+ Student Oyster photocard

As a part of being a resident of LBH, young people can apply for an Apprentice Oyster photocard if they:

- are aged 18 or over;
- live in a London borough during term time;
- enrolled at a school, college or university registered on the TfL scheme, or on a mandatory work placement in London.

To be eligible for an 18+ Student Oyster card, one of the following must apply to the young person:

- they are enrolled on a full-time course, with at least 15 tuition-led or structured learning hours a week. They must attend classes Monday to Friday only (not including evening classes) that span a minimum of 14 weeks on the same course (shorter courses repeated over 14 or more weeks aren't eligible);
- they are receiving an NHS Bursary as a full-time student. The young person must give their school, college, or university evidence of their sponsorship to validate their application;
- they are a full-time postgraduate student, studying or writing up to more than 15 hours a week;
- they are a full-time student registered and studying on a higher education course at a school, college or university not registered with the TfL scheme but on mandatory work placement in London for at least 14 weeks;
- they are a sabbatical officer;
- they are enrolled on a part-time course for at least 14 weeks and:
    - receiving an NHS Bursary;
    - a postgraduate student receiving financial help from your education establishment's hardship fund;
- if their school, college or university is outside Greater London but they live in a London borough during term time and travel regularly. Young people should ask their school, college or university if they're registered on the 18+ Student Oyster photocard scheme;
- if they were 18 on 31 August and live in a London borough, they may still be eligible for a 16+ Zip Oyster photocard.

The 18+ student oyster photocard gives a 30% discount on bus, tram, tube, DLR London Overground and national rail travelcard season tickets.

Freedom Pass for those with disabilities

TfL offers free or discounted travel on several services for those who have a qualifying disability.

To be eligible for a disabled persons Freedom Pass, the young person must:

- have a sole or principal residence located in a London Borough i.e. LBH; and
- have any of the statutory disabilities listed in the Transport Act 2000, as set out below.

The statutory disabilities which make someone eligible for a disabled persons Freedom Pass are:

- people who are blind or partially sighted;
- people who are profoundly or severely deaf;
- people without speech;
- people who have a disability, or have suffered an injury, which has left them with a substantial and long-term adverse effect on their ability to walk;
- people who do not have arms or have a long-term loss of the use of both arms;
- people who have a learning disability that is defined as 'a state of arrested or incomplete development of mind which includes significant impairment of intelligence and social functioning';
- people who, if they applied for the grant of a licence to drive a motor vehicle under Part III of the Road Traffic Act 1988, would have their application refused pursuant to section 92 of the Act (physical fitness) otherwise than on the ground of persistent misuse of drugs or alcohol.

Young people who fulfil the criteria above are eligible for a ‘Disabled Persons Freedom Pass’, and will need to contact their local authority where they apply i.e. LBH, for an application form. Applicants will be asked to:

- provide evidence of their eligibility
- provide a colour, passport sized photograph.

The application form will give guidance on what documents the young person must provide. Once a young person’s eligibility has been confirmed, their Freedom Pass will go into production and will be posted to them by second class post.

For more information on Freedom Passes and how to apply, please refer to: https://www.haringey.gov.uk/parking-roads-and-travel/travel/passes-and-concessions/disabled-persons-freedom-passapplication

Freedom Pass holders who find it too difficult to travel without assistance using public transport may be eligible for the Taxicard scheme, which is managed by London Councils. This service provides subsidised trips in licensed taxis and private hire vehicles for people with serious mobility problems.

Application forms are available by telephoning 020 7934 9791 or emailing Taxicard@londoncouncils.gov.uk
More details at: https://www.londoncouncils.gov.uk/services/taxicard

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TfL Dial-a-Ride

London Dial-a-Ride is a free, door-to-door transport service provided by TfL for older and disabled Londoners who can't either access or use other forms of public transport.

Dial-a-Ride is a shared bus service and will usually need to be booked in advance in order to use the service. It is currently operating between 07:00-22:00, seven days a week. To use Dial-a-Ride, the young person must have a permanent or long-term disability which prevents them from using public transport.

Young people are automatically eligible for membership if they are:

- a Taxicard member;
- getting the Higher Rate Mobility Component of Disability Living Allowance;
- getting the Standard or Enhanced Mobility Rate of the Personal Independence Payment (PIP);
- registered blind or partially sighted;
- getting a Higher Rate Attendance Allowance;
- getting a War Pension Mobility Supplement.

Young people may still be eligible to use the Dial-a-Ride service if the above doesn't apply to them. They will have to undergo a paper-based mobility assessment to establish their eligibility for the service.

Young people can apply for Dial-a-Ride if they are a permanent resident of a London borough i.e LBH.

Application forms are available by telephoning 0343 222 7777 (TfL call charges) or emailing dar@tfl.gov.uk

More information at: https://tfl.gov.uk/modes/dial-a-ride/

2.2 Bursaries available from your Education Provider

The 16-19 Bursary Fund

The 16 to 19 Bursary Fund provides financial support to help young people overcome specific barriers to participation so they can remain in education, including travel costs.

There are two types of bursary available. For both of the bursaries below, it is the responsibility of the educational establishments to manage them. Young people requiring support from the bursary fund, should contact their school or college to make an application.

More information at: 16 to 19 Bursary Fund: Eligibility - GOV.UK (www.gov.uk)

Vulnerable Student Bursary

A bursary of up to £1,200 a year will be awarded for young people who meet at least one of the following criteria:

- the young person is currently in LBH care;
- the young person has recently left LBH care;
- the young person receives Income Support, or Universal Credit in place of Income Support, in their own name;
- the young person receives Employment and Support Allowance (ESA) or Universal Credit and Disability Living Allowance (DLA) or Personal Independence Payments (PIP) in their own name.

To receive the maximum bursary the programme of study must last for 30 weeks or more. If the programme is shorter than 30 weeks, the young person may receive less.

Discretionary Bursary

If a young person does not qualify for a 'Vulnerable Student Bursary' they may be eligible for a Discretionary Bursary. Education providers may, at their discretion, provide financial support to meet the individual needs of the young person, including travel costs.

To be eligible for the discretionary bursary young people must:

- be aged 16 or over but under 19 at 31 August 20xx[10];
- be aged 19 or over at 31 August 20xx and have an EHCP;
- be aged 19 or over at 31 August 20xx and continuing on a study programme they began aged 16 to 18 ('19+ continuers');
- be studying a programme that is subject to inspection by a public body which assures quality (such as Ofsted), the provision must also be funded by either a Government funding agency or the local authority.

All education providers must make available a copy of their 16-19 Bursary Fund Policy. More information can be found at: www.gov.uk/1619-bursary-fund

2.3 Learner Support

If the young person is aged 19 or over, on a further education course and facing financial hardship, they may be entitled to get Learner Support (LS). The money can help pay for things like:

- accommodation;
- travel;
- course materials and equipment;
- childcare - if you qualify.

The amount of financial support that a young person may receive will depend on their individual circumstances.

[10] 'xx' should be substituted for the year that the bursary is being applied for.

To make an application for LS, young people must apply directly to their education provider i.e. their school or college. More information at: https://www.gov.uk/learner-support

2.4 Residential support

There are two types of residential support available to young people. They are:

Residential Bursary Fund

Young people may be able to get help with the cost of accommodation from the Residential Bursary Fund (RBF). For the young person to be eligible for RBF they must:

- meet the residency requirements (the college will check this);
- be at least 16 and under 19 on 31 August 20xx.

The young person may be eligible if they're 19 and either:

- continuing on a course you started aged 16 to 18;
- have an EHCP.

The young person's course must:

- be at a specialist residential centre (their school can confirm this);
- be too far to travel to each day (their school must agree with this);
- be full-time;
- be '16 to 19 funded' (their college can confirm this).

The amount of financial support will be determined by the education provider. It depends on the household income of the young person. Payments will be in place for a maximum of 3 years. Young people should apply for this assistance through the student support officers at schools or colleges.

Residential Support Scheme

Young people may be able to get help with the cost of accommodation from the Residential Bursary Fund (RSS).

For the young person to be eligible for RSS they must:

- be at least 16 and under 19 on 31 August 20xx;
- meet the residency requirements (the college will check this);
- not be on housing benefit;
- have a household income of less than £30,993;
- be studying your first level 2 or level 3 qualification (for example 2 or more A levels, a diploma or a national vocational qualification).

The young person may be eligible if they're 19 and either:

- continuing a course you started aged 16 to 18,

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- have an EHCP.

The young person's course must:

- not be at a specialist residential centre (their college can confirm this)
- be full-time at a college in England;
- be '16 to 19 funded' (your college can confirm this);
- be more than either 15 miles or a 2-hour round trip from their home, and not available any closer than that.

How much assistance the young person receives will depend on household income and where the education provider is based.

To claim RSS, the young person should contact the student support officer at their education provider.

More information at: www.gov.uk/residential-support-scheme

2.5 Young parents / Care to Learn

Young parents under 20 can access support via Care to Learn to help pay for childcare and related travel costs. As a LBH resident, the individual will be able to claim up to £175 per child per week, while they are learning.

Young parents will be eligible if:

- they're a parent under 20 at the start of your course;
- they're the main carer for their child;
- they live in England;
- they're either a British citizen or a national of a European Economic Area (EEA) country;
- their course is publicly funded (check with school or college);
- the childcare provider is registered with Ofsted or the Care Quality Commission.

The support from Care to Learn can help cover the costs of:

- childcare, including deposit and registration fees;
- a childcare 'taster' session (up to 5 days);
- keeping a childcare place over the summer holidays;
- taking a child to the childcare provider.

Young parents are also entitled to apply for an Under 19 Bus Only Ticket or for those aged 19 and over can apply for the 19 – 25 card. More information can be found at: https://www.gov.uk/care-to-learn

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2.6 Other support

Advice and Planning

For advice regarding the use using London's transport, young people can contact Transport for All's Advocacy and Advice Line on 020 7737 2339.

Transport for All is an organisation of disabled and older people. It provides advice, information, and advocacy about travelling in London, campaigns for a fully accessible, reliable, and affordable transport network for disabled and older Londoners.

TfL Travel Mentoring

TfL's free Travel Mentoring service can give guidance and support to help young people get around London. They can provide advice to help plan accessible routes for young people and help develop to gain confidence to become an independent traveller across the TfL network.

Mentoring is free of charge and can be provided Monday to Friday from 09:00 to 17:00.

More information at: https://tfl.gov.uk/transport-accessibility/learn-to-use-public-transport

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3. Travel assistance for Sixth Form[11] including young people with SEND

LBH expects that the travel assistance offer from Transport for London (TfL) to fulfil the needs of most of the young people of Sixth Form age, who are able to both access and use public transport. This means that most young people attending college/ sixth form will not require any further support from the LBH to provide them with travel arrangements.

3.1.Eligibility Criteria

Statutory guidance dictates that there are a number of criteria that a local authority must provide young people of Sixth Form age with home to school travel assistance. In order for the young person to be eligible for school transport, they must adhere to the criteria described in the following.

Age

The young person must be over 16 and under the age of 19 years of age or, they are over 19 and are continuing with a course that they started before their 19th Birthday.

LBH will not provide travel arrangements for young people who have left education and are returning after the age of 19. Those re-starting education after their 19th birthday will be assessed as adults.

Young people with SEND

LBH will make arrangements for all young people who cannot reasonably be expected to either walk, cycle, or use public transport to travel to school because of the associated health and safety issues related to their SEND. This may be because a young person's mobility, medical and/ or behavioural needs make it challenging for them to either travel alone and/ or have parents provide travel arrangements to assist their journey to and from school.

Most young people in LBH with EHCPs do not require specialised travel assistance. We will assess and identify the travel requirements for each young person on an individual basis and put suitable arrangements in place, where necessary. Further information can be found in the 'Haringey's decision process' part of this document (section 6.5).

Distance

LBH will provide transport in principle to young people whose distance between their home address and school is greater than the 'Statutory walking distances' (more information is available in section 6.9 of this document).

[11] Sixth form age refers to young people in years 12, 13 and 14 – between the ages of 16-19 years old.

Where a school is within the statutory walking distances of a young person's home address, LBH expects young people or parent to make suitable arrangements for their travel to school; unless there are exceptional circumstances, such as young people with SEND.

Those who live less than statutory walking distances away from their school will be expected to utilise the offers set out previously in this policy.

School placement

A young person is only eligible to receive travel assistance from LBH if they attending their nearest suitable school. By suitable, LBH means an education provider who can cater for the majority of the needs for the individual.

There are a number of exceptions to this rule:

- on the basis of religious belief. LBH respect a young person's religious and philosophical convictions as to the education they are provided and this will be considered when evaluating what is suitable;
- a young person having an EHCP, with the 'preferred' school being named in the EHCP. If a different school is named in the plan and the young person still wishes to attend their 'preferred' school, LBH will expect the young person to make their own travel arrangements, other than in exceptional circumstances[12].

For a young person to be eligible for travel provisions, the education provider that their study programme takes place must be publicly funded. If the school or college the individual attends is privately funded, they will not be eligible for transport.

Study Programme

The study programme that the young person attends must be full time. This means that the course must be the equivalent to a minimum of 18 hours per week, usually across at least a 3 days per week schedule.

Qualification Level

The course that the young person is on must be at Level 3 or below (information on how this is classified can be found at https://www.gov.uk/what-different-qualification-levels-mean/list-of-qualification-levels) Young people accessing Level 4 education or above, will be expected to use the financial support they receive as a part of this placement (such as a student loan or grant) to make the necessary transport arrangements they require.

[12] An exceptional circumstance may be that the school named in a young person's EHCP does not have any placements available, thereby forcing them to attend a different school.

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4. Travel assistance for young people between the ages of 19 and 25 with SEND

There is no legal requirement for local authorities to provide travel assistance for young people between the ages of 19 and 25, unless there are exceptional circumstances and LBH are therefore not necessarily required to put provisions in place for young people within this age group.

If young person has an EHC plan, is above the age of 19 and below the age of 25 years old they may be eligible to receive travel assistance from LBH.

4.1Eligibility criteria

Statutory guidance dictates that there are a number of criteria that a local authority must provide young people aged between 19 and 25 years of age with home to school travel arrangements. In order for the young person to be eligible for school transport, they must adhere to the criteria described in the following.

Age

The young person's course must start on or after the student's 19th birthday and may continue no later than the academic year in which the young person reaches 25 years old.

Distance & school placement

The young person must be attending the nearest suitable or most accessible college to their home.

More information on the guidelines for this can be found in the 'School placement' & 'Distance' section in 3.1.

Young people with SEND

The young person has SEND supported by an EHCP. More information can be found in section 3.1 'Young people with SEND'.

Study programme

The study programme that the person attends must be full time. This means that the course must be the equivalent to a minimum of 18 hours per week, usually across at least a 3 days per week schedule.

Qualification level

The course must be at Level 3 or below. More information in section 3.1 'Qualification level'.

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5. Applications

Applications for Post-16 travel assistance can be made via our website (https://eforms.secure.haringey.gov.uk/ufs/TRANSPORT_AND_TRAVEL.eb?ebd=0&ebp=10&ebz=1_1636535537036

All applications must be submitted via the website and can't be made over the telephone or via email. It is essential that applicants[13] include as much information as possible with regards to a young person's condition(s) as this will allow us to provide the most suitable travel arrangements to fulfil the individual.

If an applicant is unable to complete the application form whatever reason, they should contact the PTS team (details in section 9) or seek assistance from their school to submit it on their behalf.

Applicants will receive a decision with regards to the outcome of their application in writing.

5.1 When is a new application required?

Applicants will need to complete a new application for a child if one of the following applies to them:

- the young person has changed address;
- the young person has changed the school they attend;
- the young person is attending a new school or college, or remaining at the same school.

Making a new application will allow LBH to gather the most accurate information and allow us to accommodate the needs of the children more effectively.

5.2 Timescale

Although we aim to process applications as quickly as possible, young people and parents should allow up to 30 days[14] from the date of application for a response to their application. After the acceptance of an application, a parent should allow up to ten working days from receipt of the confirmation for the travel arrangements to be put in place. If an applicant has not received an answer in this timeframe, they should contact the PTS team (details in section 9).

To reduce disruption to the service and inform effective planning, LBH are implementing cut-off dates for applications. The beginning of the academic year is the most critical time with regards to school travel and we aim to promote continuity in the service we provide the children. Late applications present several issues for

[13] Applicants has been used in this document, as parents, carers, schools or even children can make an application for travel assistance.
[14] Calendar days- not working days unless stated otherwise.

the service in several ways, which is why a cut-off date is necessary. These issues include but are not limited to:

- other service users having to be placed on different vehicles to what they have become accustomed to in order to accommodate new passengers;
- vehicles not being optimised to fulfil the specific needs of the young people on board;
- longer journey times due to routes becoming inefficient;
- temporary overcrowding of vehicles until young people can be moved/ new vehicles procured.

Cut-off dates will be published well in advance on the LBH's local offer, which is available on our website. We will also correspond with parents in writing via mail/ email informing them of the exact dates.

Late applications may result in a delay in LBF providing travel arrangements for the young person. We endeavour to process applications as quickly as possible, but it will likely result in travel arrangements not being in place until after the term begins. Until arrangements have been put in place, it is the parent/ young person's responsibility to provide travel assistance.

The cut-off dates will not apply in cases where there are exceptional circumstances. For example, the cut-off dates will not apply to anyone whose circumstances change at any time after the published dates[15].

[15] For example, where an EHC plan is finalised and the Local Authority places the young person in different school, or where the family moves home.

6. LBH's travel assistance offer

LBH considers public transport as a suitable method of transportation for most young people to travel to their educational provisions. Where this option may not be suitable for a young person, we operate several different schemes to provide support them in attending their place of learning. These services can be accessed upon application and only if certain criteria are met (as per sections 3.1 & 4.1).

In instances where a young person is not eligible for travel assistance and/or their application has been declined, LBH will expect them to travel to their place of learning (accompanied if necessary) using provisions in place by TfL (more information in 6.1 & 2.1).

If a young person's application for school travel assistance is successful, LBH will use its discretion to offer one of three travel options, based on the specific needs of the individual. The options are as follows:

- vehicle transportation- the young person will be transported by taxi or bus, most likely with other passengers attending the same school. More information in section 6.2.
- independent or assisted travel training- supported one-to-one or group training designed to equip young persons with the skills required to travel independently, be it on foot, or by public transport. More information in section 6.3.
- personal travel budget (PTB)- a PTB is a payment designed to help young people/ parents to make any of the travel arrangements needed to facilitate their young person accessing school. More information in section 6.4.

It is down to the discretion of LBH to decide which of these options is most suited to the needs of the young person, as well as the best use of LBH's resources. Further information about how LBH makes their decisions can be found in section 6.5.

6.1 TfL's Offer

In instances where a young person is not eligible for assistance from LBH and/ or, is capable of using and has access to public transport, LBH will expect the offer of travel assistance from Transport for London to provide sufficient support to facilitate a person's transport to school.

More information on their offer for young people who are considered Post-16 can be found in section 2.1 of this policy.

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6.2 Vehicle transportation

Provisions of travel assistance using taxis or buses will only be granted when it is deemed essential to the young person's needs. LBH will provide suitably qualified, registered vehicles from a commercial provider that adhere to the contractual standards that the council have set.

In a bid to reduce congestion and to make best use of council resources, young people will mostly travel together on communal bus routes. We will only provide individual private hire vehicles based on the assessed needs of the young person.

LBH may also provide vehicular transportation if the passenger is the only person, or a small number of people, who attend a particular school or placement. This is usually the case when the young person attends a school out of the borough.

We will regularly review the duration of vehicle journeys, taking into consideration the route and the individual needs of the passengers on board. Statutory guidance suggests young people of post-16 age may reasonably be expected to travel up to 75 minutes[16]. This journey time may not be suitable for every young person, for example where they have SEND and/ or has acute medical needs. LBH will assess routes on a case-by-case basis and provide additional travel assistance arrangements where necessary.

Pick-up & drop-off points

Young people will only be picked up from their home address if it is essential to their individual needs. In all other cases, LBH will inform the young person/ parents of a local pick up/ drop-off point. These locations are usually communal areas where we can pick up/ drop-off children. The reasons for using these are:

- to encourage and maintain independent travel for young people;
- to reduce the journey times for young people;
- to ensure that the route taken is the most efficient.

We offer two types of pick up & drop off points. They are:

- local pick-up & drop-off points
- home pick-up & drop-off

Where an individual is of 'Sixth form' age, it is the responsibility of parents to ensure that the young person is at the pick-up point in the morning, and that a responsible adult is at the drop-off point to collect them in the afternoon.

[16] This is dependent on the placement the child attends. For example, if a young person attends a college that is approximately 75 minutes away, it is reasonable that the person may be on a vehicle longer than the statutory guidance, due to variances in traffic etc.

LBH will determine whether it is necessary for a young person between the ages of 19-25 to be accompanied to a pick-up point/ collected from a drop off point by a parent, based on their specific needs. Parents should assume that this is required, unless notified otherwise.

Local pick-up & drop-off points

This will be a safe and convenient location, close to the young person's home address, within a reasonable walking distance.

When assessing if a young person will access their travel arrangements from a local collection point, LBH will consider both the passenger's and the parent's individual needs. This will include but not exhaustive to:

- the mobility needs of the young person;
- the health needs and/ or medical conditions of the young person;
- any sensory impairments of a young person;
- the personal safety of the young person;
- public safety;
- family circumstances.

Local pick-up points will be individually assessed for suitability and will be approved by LBH before they are used. When assessing the suitability of a local pick-up point, we will consider the following:

- if the pick-up/ drop off location is within a suitable distance of the young person's home address;
- if the vehicle can access the area and can effectively allow people to board the safely;
- if the location allows for the young person's mobility needs e.g. wheelchair access;
- if the location is an area where there is low traffic/ pedestrian congestion e.g. avoiding busy car parks where possible;
- if the location has suitable shelter in the event of adverse weather conditions.

Home pick-up & drop-off

Where it is determined to be necessary due to a young person's needs, LBH can provide pick up and drop offs from their home address.

The parent or a responsible adult must be at the home address at the time that the young person is picked up/ dropped off, unless they are informed otherwise. We will endeavour to provide the most accurate times but variables such as traffic can affect these.

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Carers with more than one child on LBH travel assistance

We will also consider providing home pick up/ drop off where a parent has more than one child/ young person on travel provided by LBH. This is to prevent any issues arising from parents having to be at certain pick up/ drop off points at logistically challenging times.

Pick-up/ drop-off times

Parents/ young people will be informed of approximate times that they will be picked-up or dropped off by the PTS team. Although we will endeavour to accommodate the individual needs of child, we cannot take parental and family circumstances into account when arranging pick-up and drop-off times. Due to many of the vehicle services we operate being communal, we are unable to provide times based on parental 'preference', as we will not be able to cater for every user's needs at the same time. This would include whether a parent is unable to accompany a young person to and from their pick-up & drop-off point due to work commitments.

In instances where parents are taking siblings of a young person to the same, or another school, we expect parents to make suitable arrangements to ensure the individual is at the collection point in the morning/ a responsible adult is available at the drop-off location in the afternoon.

Exceptional circumstances may exist and if so, we will consider the evidence provided on a case-by-case basis.

Lateness

If a parent is late in getting a young person to the pick-up point or getting them ready, LBH's vehicles will wait a maximum of three minutes after arrival. After this point, the vehicle will move on to the next passenger that needs to be picked up. This is to ensure the smooth running of the service and to prevent any further delays for other passengers on the route.

If the vehicle has left the pick-up point due to the young person being late, it is the responsibility of the parent/ young person to make their own travel arrangements to get to their place of learning. If they are able do this, LBH will be able to recommence arrangements from the afternoon collection from school.

If a LBH vehicle is running late, parents/ young people may be able to track the progress of the route by using the 'Missions' app. The App will provide parents/ young people with the current geographical location and they should therefore check the 'Missions' App prior to contacting the PTS team. For more information on the 'Missions' App or how to access it, parents/ young people should check with the PTS team.

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In instances of severe lateness, we will endeavour to notify the parents and passengers by SMS text, email, or by a phone call[17]. It is therefore pivotal that we are kept informed of the latest contact information for parents. We will also endeavour to keep schools appraised of the lateness when this occurs.

Passenger assistants/ escorts

Based on the needs of the passengers on any given vehicle, LBH may provide a passenger assistant (PA)[18]. A PA will only be provided where it is deemed necessary for the safe operation of the vehicle and/ or care of the young people on board.

Factors that determine the need for an escort include but are not exhaustive to:

- the medical needs of the young person;
- the behavioural needs based on a young person's SEND.

The needs of the passengers on board the vehicle will be assessed by a member of the PTS team.

6.3 Travel training and travel buddy scheme

LBH may decide to provide assistance in the form of travel training via our travel training and travel buddy scheme. One of our core values is to promote independence for young people with this form of travel assistance the most effective way to achieve this.

We offer two types of travel training:

- Independent travel training (ITT);
- Assisted travel training (ATT)/ travel buddy scheme.

Independent travel training (ITT) is one-to-one, or group classroom training designed to equip young people who are entitled to school transport with the confidence and skills required to travel independently, be it on foot, or public transport.

Assisted Travel Training (ATT)/ travel buddy scheme is a supported travel training scheme, which involves a travel trainer accompanying the young person on their journey to school, be it on foot, or public transport. Travel buddies and trainers will work closely with school staff, parents, and the young person to cater the travel training to the specific needs of the person.

Travel training is not only beneficial for young people whilst they are travelling to education, but it can also help them in many other ways. This includes such benefits as increased independence, self-esteem, access to social life, social skills, and access to job opportunities.

[17] This may either be from the PTS office team or the passenger attendant on board the vehicle.
[18] Also referred to as an 'escort'.

We aim for the young person to have the same trainer throughout their training (except during leave and exceptional circumstances), and the team can offer support afterwards.

All our training programmes are accredited. For a young person to be declared 'independent', the individual's travel skills are evaluated by one of our assessors. Where the young person displays the necessary skills to travel safely to school independently, they will be accredited with a certificate detailing that they have successfully completed the course.

In instances where a young person doesn't exhibit the necessary skills to be independent, LBH will provide additional training, amending the teaching methods where necessary.

Once a young person has been certified as independent, LBH will expect the travel assistance offer from TfL (in section 2.1) to provide sufficient support for the individual's journey for school.

Training delivery

Parents/ young people will be involved from the outset, starting with a meeting with the travel assessor who will work with them to tailor the program to the individual's needs. A travel trainer will accompany the applicant throughout their whole journey from home to school and vice versa, empowering them to manage every aspect of their journey independently. The program will encompass:

- personal safety;
- finding their way;
- Green Cross Code;
- road, walking, and bus safety;
- planning a journey;
- using a bus pass and paying a fare;
- using buses, trams, & trains;
- problem solving, such as service cancellations.

The training is delivered one-to-one from a trained 'travel buddy'. Until the young person is considered capable of completing the route on their own confidently, they will always be accompanied by a travel trainer. There will be regular assessments of progress, which will be shared with the family and school of the young person.

Some special schools in the borough offer their own travel training for their pupils. Parents should check with their young person's school first before applying to the Passenger Transport Service.

Eligibility

To be considered for travel training a young person must have the potential, once trained, to travel to and from school completely independently. Before any training

takes place, we will first assess whether the young person is ready for travel training on individual basis. To assess a applicant's eligibility/ potential to travel independently, LBH will consider:

- the information on an EHCP for the young person, if applicable;
- information contained in the application form;
- risk assessments obtained from schools;
- route assessments by a LBH officer;
- information from key workers.

On the days where there is no travel training, for example when a travel trainer is absent due to illness, the learner will continue to use their normal mode of transport to get to school/college. Once the training is completed and the learner becomes independent, they will start to walk or use public transport as trained.

Applications should be made via the usual method, more information in section 5.

6.4 Personal transport budget (PTB)

A PTB is a payment designed to help parents make any of the arrangements needed to facilitate the young person accessing school. Parents/ young people can use the budget in any way they wish to ensure the child attends school every day, on time, and ready to learn. Examples of how a PTB may be used include:

- contributing towards covering the costs of running a car;
- purchasing travel passes for the parent and/ or child to use public transport;
- paying for travel arrangements for an older sibling, thus allowing the parent to accompany the younger child to school[19];
- paying for childcare arrangements for a younger sibling, whilst the parent takes the older sibling to school;
- paying a PA to accompany the child to school on public transport i.e. a travel buddy;
- arrange shared travel, such as a car or taxi, sharing with another family;
- purchasing bikes for children and support climate change initiatives.

If a parent/ young person chooses to receive a PTB, LBH will consider their duty of providing school travel arrangements for eligible young person fulfilled and will provide no further assistance.

PTBs are granted at the discretion of the local authority, where it is cost effective for the authority to do so. There is no automatic right to receive a PTB, in place of alternative transport assistance, which parents/ young people may have been offered. We reserve the right to withdraw the PTB at any time. If we to withdraw this support, LBH will provide alternative forms of travel assistance[20].

[19] This should be considered particularly in cases for children with SEND, with this parent taking the child with SEND themselves.

[20] Unless there are exceptional circumstances, such as those outlined in the Ceasing/ withdrawal of travel assistance (section 6.7).

To receive a PTB, applicants must apply through the usual application form and contact PTS (details on how can be found in section 9) to state their preference for a PTB. Young people must comply with the eligibility criteria detailed within this policy (more information in sections 3.1 & 4.1) to entitled to a PTB.

The value of a PTB is dependent on numerous factors, which will be considered when determining the amount of financial support each young person is entitled to. These include but are not limited to:

- the distance from the young person's home address and school;
- the duration of the journey from the young person's home address and school[21];
- school schedule i.e. the number of days the young person attends school;
- reasonable methods of travel (i.e. walking, bus, tram or train) based on the young person's needs, and the expense associated with them;
- passenger assistant costs to act as a 'travel buddy' or trainer[22]. LBH will pay the 'London Living Wage' for this cost, for the duration of the journey only;
- fuel costs.

Formula for PTB value:
(journey time x PA cost per hour + journey cost) x journeys per day x number of days attending school per week x number of weeks per academic year = PTB value

Appendix A (on page 48) displays a diagram showing an example of how a PTB is calculated.

When a parent has more than one child who are eligible for a PTB, they may be entitled to receive a PTB for each child. The values of each PTB will be determined by the above criteria, however the budget paid for the first child will also be considered when determining the value for any subsequent children.

PTBs are paid over the academic year (in arrears on a monthly basis unless other arrangements have been made). As a part of receiving a PTB, a young person's attendance record at school will be monitored and reviewed. Payments that have been made for days that they are absent will be deducted from the following month's PTB payment. If a young's attendance drops below an acceptable level without a

[21] Journey times will be calculated using Google Maps, taking into consideration traffic or public transport variances for the time of day that a child travels.
[22] Parents may be considered to undertake this role.

suitable reason[23], LBH may decide to withdraw the PTB. We determine that the statutory expectation of 95% attendance to be acceptable.

If a young person is in receipt of a PTB and they or their parent believes it is no longer suitable, or not of sufficient value to fulfil their needs, they must notify LBH in writing (details can be found section 9 of this document). We will require supporting evidence as to why the PTB is no longer suitable, or of sufficient value to make the necessary travel arrangements. The case will be reviewed by a senior officer of the PTS team, who will consider:

- LBH's decision making process (outlined in section 6.5 of this document);
- the factors such as distance and journey times etc.; as outlined in this section of the document (section 6.4),
- the supporting evidence supplied by the young person/ parent.

Young people or parents should allow for 30 calendar days to receive a response in writing. During this time, it is the parent's responsibility to provide travel arrangements. If LBF determine that the explanation is valid, we may:

- provide an alternative form of travel assistance, with arrangements commencing after the payment period for the most recent PTB instalment;
- increase the value of the PTB accordingly, with adjustments being made from the date of the confirmation email.

Parents/ young people who are not satisfied with the outcome of this review of their PTB should follow the procedure outlined in the Appeals section (7) of this document.

Mileage claim

In instances where a parent/ young person can provide their own travel arrangements by vehicle, they may be eligible to claim mileage. The young person will have to be eligible to receive travel support as per the criteria in sections 3.1 & 4.1).

Formula for mileage:
(Miles per journey x average vehicle miles per litre x fuel cost per litre) x number of days attending school per month = Mileage claim value

6.5 Haringey's decision process

After receiving an application, an assessment will be made as to whether the young person is eligible to receive travel assistance from LBH, as per the 'Eligibility Criteria'

[23] LBH will correspond with schools and parents to determine what is an 'acceptable level', based on the individual needs of the child. We will only consider unauthorised absences when determining acceptable levels of attendance.

sections 3.1 & 4.1 above. All decisions will take governmental statutory guidance and legislation into consideration.

Once a young person is deemed to be eligible, LBH will determine the type of travel assistance that we will provide. We will consider evidence regarding, but not limited to:

- what other arrangements the parent/ young person have considered or tried and why they are not suitable;
- the specific needs of the young person, particularly in instances where the individual has SEND;
- whether the young person is attending the nearest suitable educational establishment that fulfils their needs;
- whether there is a family member/carer who is able to transport or accompany the young person.
- the distance from home to school;
- the complexity of the journey from home to school;
- whether there are other efforts have been made to financially support the young person to access education, e.g. grants, bursaries and other benefits and allowances.
- if the young person can become an independent traveller;
- the best use of LBH's resources.

To ascertain all of this information, we rely on a number of sources. These include:

- the information within a young person's EHCP, if applicable;
- information contained in the application form;
- risk assessments obtained from schools;
- route assessments by a PTS officer;
- information from passenger attendant/ escorts;
- information from key workers.

As such, it is essential that information about a young person's medical needs, ways of communicating with people, particular likes and dislikes or fears (such as loud noises etc.) are included in their application.

As an example, a particular young person is a wheelchair user. As a result of being informed of this, LBH can plan to put provisions in place that reduce the impact of this on the young person's journey. If the individual is receiving travel training, we will take this information into account to ensure the public transport routes they use are accessible.

A diagram of the decision process can be seen in Appendix B (on page 49).

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6.6 Travel assistance reviews

LBH reserves the right to review the type of travel assistance that a young person receives. Typically, this will be assessed annually but there are some circumstances that may result in transport arrangements being reviewed. These include but not exhaustive to:

- a young person transitioning from one school to another ;
- a young person's home address changing;
- a change in the young person's needs;
- an incident occurring on the current travel arrangements[24], necessitating the need for a change in the type of travel assistance provided.

In all the above examples, it is the parent/ young person's responsibility to re-apply for transport and/or notify LBH of the change in circumstances. Failure to inform the PTS team of any changes may cause delays with the provision of transport for the young person being put in place, or potentially withdrawn.

The results of a review will be implemented at a convenient time of the academic year, such as the beginning of the school term. In instances where a young person is moving home, the new arrangements will be made as soon as reasonably practicable.

6.7 Ceasing/ withdrawal of travel assistance

Outside of the outcome of a review there may be various reasons why a young person's travel provisions may be withdrawn. These reasons may include but are not restricted to:

- if it is proven that travel assistance was obtained on the basis of fraudulent or misleading information;
- a young person's behaviour is in contradiction to the behavioural standards (more information can be found in section 8.1 of this document) and is so severe that travel arrangements are withdrawn. This is assessed on an individual basis, taking into consideration the specific behaviours a young person's SEND.

6.8 Transport times

LBH will provide travel assistance to and from school at the beginning and end of each day. This will be at 'regular' school times, as determined by the school schedule. This ensures that we; as the local authority, will have the necessary resources available at the specific times that travel assistance are required.
LBH appreciates that a young person's educational programme may differ to 'conventional' school timetables, especially in the case of individual's with SEND. In exceptional circumstances, we will put provisions in place. An example of one of

[24] Such as an incident that that has led to a temporary suspension from transport.

these circumstances would be if a differing timetable were to be named as part of a young person's EHCP.

Prior to LBH providing of travel assistance for a young person, we will inform parents/ young person of the schedule around which those arrangements will be made. For example, an individual will be given travel assistance in the mornings only if finish school earlier than the 'regular' school closing time.

Breakfast/ after school clubs

LBH do not provide travel arrangements outside of regular school times and do not provide transport for non-statutory school activities, such as breakfast clubs. In these circumstances, it remains the parent's responsibility[25] to provide travel assistance for the child.

There are various reasons why travel assistance isn't provided outside of the 'regular' school times. These include but are not exhaustive to:

- a PA being allocated to the route and this resource not being able to accommodate the different times;
- a young person being allocated to a route with other passengers who do not attend the same club;
- breakfast/ after school clubs not being at the same location as the school;
- club times being inconsistent e.g. a club finishing at 4pm one day and 5pm the next.

LBH will only consider providing travel arrangements for breakfast/ after school clubs where it is logistically viable. An example of this would be where all the young people who are allocated to a particular vehicle all attend the same after school club, and the travel providers and PA are able to accommodate the change in times. It is down to the discretion of LBH whether we will provide travel assistance for breakfast/ after school clubs.

Residential schools

Where a young person is attending a residential school, LBH will only provide travel assistance:

- at the beginning of the week;
- at the end of the week;
- at the start of half term/ term
- at the end of half term/ term
- in cases of emergency, with what constitutes an 'emergency' being at the discretion of LBH.

[25] In some instances, schools provide their own transport for these activities. Parents should check with their school prior to contacting LBH regarding this.

We will not provide travel arrangements for parents or families to visit the school. If parents wish to visit (including the first day of school), they must make their own arrangements or contact the school.

Additional journeys

LBH's transport providers are only permitted to provide travel assistance for young people in the following instances, unless authorised by an officer in the PTS team:

- a journey from a young person's designated pick-up point to their school;
- a journey from a young person's school to their designated drop off point;
- on journeys as per the young person's school schedule, as agreed by LBH.

We will not provide travel arrangements for:

- school trips;
- medical appointments;
- work experience or work placements;
- early collections from school due to a young person's illness;
- visits to other school locations away from the pre-agreed school placement location;
- sports facilities.

Where a person has more than one address, home to school travel assistance will be provided to and from the residence where the individual is habitually and normally resident.

6.9 Statutory walking distances

To promote the travel arrangement ideals of the LBH, young people will be expected to walk; where possible, if their residence is within the following distances from their school:

- 3 miles for young people over the age of 8 years old.

How do we measure distance?

The distance is measured using online mapping tools, which measure the actual distance travelled (not a straight line or 'as the crow flies'). This will account for a 'reasonable' and 'suitable' route that the young person could take to travel to school.

Young people with SEND

Statutory guidance dictates that statutory walking distances should not be considered when assessing the transport needs of young people eligible due to SEND.

LBH therefore do not consider this when determining the outcome of applications involving a young person with SEND.

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6.10 What to do if a young person's arrangements aren't suitable?

If a parent/ young person feels that the arrangements they receive are not suitable, they should email PTS at school.transport@haringey.gov.uk; stating the reasons that they are not suitable and provide any supporting evidence for this.

They can also follow the 'Appeals' procedure outline in section 7.

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7. Appeals

A parent/ young person has the right to appeal decisions that LBH make surrounding their travel assistance arrangements. Reasons to appeal may include but not exhaustive to:

- when an application for travel assistance is refused;
- when LBH proposes arrangements for travel assistance that the parent/ young person does not agree to;
- when LBH changes the existing travel assistance arrangements for a young person that a parent does not agree to.

The appeal process has two stages. Stage one will the look at the original decision and assess whether it had the correct outcome. If the person appealing is still not happy with the decision of the stage one appeal, they have the right to proceed with a stage two appeal.

Appendix C (on page 50) displays a flow diagram showing the appeals process.

Each stage of the appeal will assess:

- the nature of the decision reached;
- how the review was conducted (including the standards followed e.g. Road Safety GB);
- information about other departments and/or agencies that were consulted as part of the process;
- what factors were considered in the decision;
- the rationale for the decision reached.

7.1 Stage one appeal

A stage one appeal must be submitted in writing within 20 days of the letter or email refusing travel assistance or proposing changes to existing arrangements. Stage one appeals must be sent to:

School Travel Assistance Appeal,
Special Education Needs,
London Borough of Haringey,
2nd Floor, Alexandra House,
10 Station Road, London,
N22 7TR
or by email to: appeals@Haringey.gov.uk

This appeal will be reviewed by a senior officer within the SEND team at LBH, who were not involved in the original decision. It should contain:

- the reasons why the parent believes the decision should be reviewed;

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- any details of supplementary evidence or reasoning that the person appealing believes should be considered when the decision is reviewed.

After the appeal has been reviewed, the outcome may be to:

- uphold the appeal, or;
- not uphold the appeal and continue to refuse travel assistance.

The person appealing will be informed of the stage one decision in writing within 20 days of receipt of the appeal.

If they are not satisfied with the outcome of the stage one appeal, they can proceed with a Stage Two appeal.

7.2 Stage two appeal

A parent/ young person has 20 days from receipt of LBH's decision of the stage one appeal to escalate the appeal to stage two. This must be submitted in writing to:

School Travel Assistance Appeal,
Special Education Needs,
London Borough of Haringey,
2nd Floor, Alexandra House,
10 Station Road, London,
N22 7TR
or by email to: appeals@Haringey.gov.uk

The appeal must be submitted in writing and must include the reasons for challenging the decision of the stage one appeal. It should include any new evidence or documentation that has become available.

Within 60 days of receipt of the parent's request, an independent appeal panel will consider written and/ or verbal representations from both the parent/ young person and the officers involved in the case. The person appealing will be provided with a detailed written notification of the outcome of the stage two appeal, within 5 working days of the panel convening.

The outcome of Stage two appeals are final and there is no further right to appeal.

7.3 Ombudsman

If the person appealing believes that the LBH has failed to follow correct procedures, or if there were any irregularities in the way the appeal has been handled, they have the right to complain to the Local Government Ombudsman.

The Local Government Ombudsman's contact details are:

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- 0300 061 0614
- www.lgo.org.uk

If the parent/ young person considers the decision of the independent panel to be flawed on public law grounds, the complainant may also apply for judicial review.

7.4 Important appeals information

During the appeals process, the following will apply:

- no travel assistance will be provided;
- no changes to existence arrangements will be implemented.

Parents/ young people are responsible for providing their own travel arrangements until the outcome of the appeal has been determined.

7.5 Complaints

If parents/ young people wish to make a complaint about the level of service they have received regarding their travel arrangements, they can submit a complaint via the council's dedicated webpage:

https://www.haringey.gov.uk/contact/council-feedback/make-complaint

They can also complain in writing to the following address:

Special Education Needs,
London Borough of Haringey,
2nd Floor, Alexandra House,
10 Station Road, London,
N22 7TR

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8. General Information

8.1 Behavioural standards

As a local authority, it is not LBH's intention to enforce a 'Code of Conduct' for young people accessing home to school travel assistance. Young people interact differently with the types of arrangements we provide, particularly in instances where an individual has SEND. We therefore aim to encourage young people to adhere to a set of principles to keep behavioural standards consistent, as well as ensuring the safety of all the people involved.

Principles

Although we acknowledge the need to consider a young person's needs and circumstances into consideration, there are several principles that must be always adhered to. Once on the vehicle, a young person must:

- remain in their seat at all times;
- wear their seat belts at all times;
- follow the instructions of the PA and/or driver (where applicable).

We ask that service users do not:

- be verbally abusive to drivers, PAs, other passengers or any other member of the public whilst in or around the vehicle;
- behave in a way that may create danger to themselves or other passengers;
- cause damage to the vehicle itself;
- abscond from the vehicle;
- eat or drink on the vehicle, unless there are exceptional circumstances[26]
- use mobile devices to take pictures or video recordings whilst in or around the vehicle[27];
- exhibit behaviour of a sexual nature;
- spit at or fight with other service users.

For young people with SEND

LBH understands that young people with SEND may experience challenging behaviours because of their condition(s).

When LBH experiences an incident or an exhibition of challenging behaviour on the travel arrangements we provide, we will work closely with parents and schools to gather more information into the individual's specific needs and how our service can meet them.

We may contact schools to obtain 'Behavioural, Sensory and Communication' profiles for the child, as well as asking parents for their assessment of their child's

[26] This is for health and safety reasons. We must be informed of any reasons why a service user needs to eat on the vehicle. This may include medical or religious reasons.
[27] This is for the safeguarding of other passengers.

needs in the form of a 'One Page Profile'. An officer of the PTS team will contact the relevant party i.e. the parent or school, to provide the information where necessary. Both profiles will enable us to cater to the specific needs of the young person and prevent further incidents from occurring in the future.

If a child is still experiencing behavioural issues whilst using the travel assistance we provide, a risk assessment may be conducted by an officer of the PTS team to determine what other provisions may be necessary to allow safe travel of all the parties involved.

Outcome of principle rule breaks

It is the responsibility of LBH to ensure that all young people who are provided with travel assistance get to their place of learning safely. Behaviour that doesn't conform with the principles in section 8.1 may affect the safety of other passengers, drivers, and PAs. Poor behaviour of young people on transport can cause distress to others, preventing them from arriving at school in a good state of mind.
Incidents of misbehaviour or principle rule breaks will be fully investigated by a member of the PTS team. When determining the outcome of an investigation, LBH will consider:

- any SEND a young person may have and how this may affect their behaviour;
- reports and testimony from drivers, PAs, other passengers, and/ or members of the public who witnessed the incident;
- evidence submitted by parents;
- evidence submitted by schools.

Persistent principle rule breaks or exhibitions of extreme behaviour may result in:

- a warning. We will inform the young person's parent and school of the incident that has occurred and ask for them to reinforce the 'Behavioural Principles' of LBH with the individual.
- a temporary/ fixed period exclusion from transport[28]. This will allow LBH the time to arrange for the necessary provisions to be put in place to ensure the safe travel of the individual, other passengers, PAs and drivers. We may need to arrange for additional resources, such as a one-to-one PA or a harness for the young person during transit, which may take time to put in place.
- a permanent exclusion from transport. This will only be in cases of extreme behaviour once all other avenues have been exhausted.

It is the aim of the PTS team to facilitate the learning of all eligible young persons, and we will consider suspensions only when it is necessary for the health and safety of all the individuals involved.

[28] Guidance from the Department for Education states that non-provision of transport during periods of exclusion on behavioural grounds does not mean that LBH is failing in its statutory duties.

Prior to any of the outcomes of principle rule breaks being enforced, LBH will consult with the parents and the school of the young person to:

- inform them of the decision that was reached;
- explain how decision was reached;
- explain how the decision affects the young person's school travel arrangements going forward.

Parents/ young people will be responsible for their own travel arrangements during any period of exclusion from transport.

8.2 Parental/ carer responsibilities

Overall responsibility for a young person's attendance at school is that of the parent. LBH will endeavour to make travel arrangements for eligible young people that are suitable not only for the individual, but parents and schools alike. Despite this, we cannot change travel arrangements to suit a parent's work schedule. Parents are expected to make other suitable arrangements for someone else to accompany their children as necessary.

In the instances that LBH do provide travel arrangements for a child, it is the responsibility of the parent(s) to ensure:

- the young person is at the 'pick up point' or ready to be collected from home at the allocated time in the morning, unless they are told otherwise by a member of the PTS team;
- a responsible adult is at the drop off point or home of the young person at the end of the day at the allocated time, unless they are told otherwise by a member of the PTS team;
- the young person is brought to the vehicle and parents assist LBH staff with placing them on the vehicle, where appropriate;
- the PTS team is provided with the correct and up-to-date contact information and addresses;
- the PTS is informed, in writing, if there is a change to the 'regular' person collecting their child from the drop-off point[29].
- they re-apply for transport and/or notify LBH of the change in circumstances (please see the 'Applications' sections 5 for more details);
- the PTS team are informed as soon as possible if the young person is sick or unable to attend school for whatever reason. Contact information can be found in section 9;
- the young person behaves in accordance with the 'Behavioural standards' of LBH school travel assistance policy (details in section 8.1).

[29] Without confirmation in writing, Haringey *WON'T* allow the child to be handed over. This is for the safety of the children.

- they treat all members of the school travel assistance team with courtesy. This includes but is not limited to office staff, PAs, travel buddies and/or drivers.

LBH do not deem it sufficient for parents to inform a PA, travel buddy or driver of any changes in circumstances, such as home address or contact information. We require formal correspondence to put the necessary arrangements in place.

Parents failing to meet the above consistently may result in the young person's eligibility for travel assistance to be reviewed and/or suspended until suitable measures can be put in place.

Failure to attend home/ collection point

In instances where a parent is not at home or the pick-up/ drop-off point at the designated time to collect the young person, the vehicle will wait three minutes from the arrival time. If the parent doesn't arrive, the vehicle will drop the other passengers on board the vehicle off and after this, attempt to drop-off the young person again. In the interim, our office and/or the PA will attempt to contact the parent. It is therefore important that the PTS are provided with the latest contact information for parents.

If a parent or responsible adult is still not at the pick-up/drop-off point after this final attempt, the young person will be taken to a point of safety, such as a police station[30].

The parent is responsible for collecting the young person from this location and are liable for any associated costs.

Persistent failure of a parent to be at the pick-up/ drop-off point or home, may result in the suspension of travel arrangements for the individual until there is a resolution to the issue.

Some Post-16 young people do not require a parent to pick them up/ drop them off. A child will only be allowed to travel to/ from the pick-up & drop off point if:

- we have received written confirmation from the young person's parent that this arrangement is appropriate;
- it is suitable based on the young person's need[31].

The overall decision as to whether a young person needs a parent to escort them to and from pick/up/ drop off points is LBHs.

[30] This will only be the case where a young person needs to be collected by a responsible adult ang/ or if it is deemed necessary for the young person's safety.
[31] This will be determined by a member of the PTS team.

8.3 Adverse Weather

LBH will endeavour to reduce the impact that adverse weather may have on the service but in the event of severe weather conditions such as snow, storms, and/ or flooding, we may:

- inform the parent/ young person that the 'regular' service the passenger is allocated to may be delayed;
- change the vehicle a young person is allocated to;
- change the PAs/ drivers allocated to the vehicle;
- change the type travel arrangements in place for a young person;
- cancel the travel arrangements in place for a young person.

Parents/ young people will be informed as soon as possible by an officer of the PTS team when either of these occur.

We will only cancel travel arrangements when it is deemed necessary to guarantee the health and safe of the passengers, PAs and, drivers on the vehicle. If parents have been advised that travel arrangements have been cancelled for the passenger's morning journey, LBH cannot guarantee that arrangements will be in place for the afternoon journey.

Parents/ young people who have chosen to travel to school by their own arrangements during severe weather conditions, should ensure that they have confirmed return transport arrangements for the return journey before attending school on that day.

8.4 Medication

Members of transport staff, such as PAs and drivers, are not permitted to carry or administer medication, or to replace medical accessories (for example, gastrostomy or tracheotomy tubes) on board vehicles. There is no statutory duty for agents of LBH to administer medication whilst on school travel assistance.

We do expect PAs and/ or drivers to promote the health and safety of all of the service users in their care.

All members of the PA team have received accredited emergency first aid training. This is refreshed within the designated timescales, or where it is deemed necessary by the PTS team. This training covers a wide range of topics, including but not exhaustive to:

- cardiopulmonary resuscitation (CPR);
- managing an emergency;
- general injuries e.g. cuts;
- dealing with instances of choking;
- identification and management of seizures;

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- dealing with an unresponsive person;
- managing symptoms of shock;
- choking.

As a part of their application for transport, a parent/ young person is required to provide LBH of any information regarding the medical needs of the passenger. It is vital that this is done to ensure that we accommodate the needs of every eligible young person accessing school travel assistance. For the safety of the passenger, failure to provide the requested information may result in a delays in provisions being put in place and/ or temporary withdrawal of travel assistance services until the required information is obtained.

What happens in the event of a medical emergency?

In the event of an emergency, the protocol is for PAs and/ or drivers to contact emergency services by calling 999. They are expected to ask for a paramedic crew to attend the location of the incident and follow any of the guidance given by the medical professionals on the call.

By parents providing us with the most recent information pertaining to a passenger's medical conditions, we are able relay the correct information to attending paramedics.

It is for parents/ young people to decide whether they wish to travel on these terms.

Children/ young people with complex or acute medical needs

Where a young person has complex or acute medical needs that the existing PA team are not trained or qualified to deal with, LBH will seek to provide a medically trained professionals to accompany them for the duration of their school journey.

LBH will assess whether a young person will require any extra provisions to be put in place in order for them to travel safely to school, such as a specialist nurse. In order to determine the needs of the child, we will:

- consult their EHC plan;
- use information contained within the application for travel assistance;
- risk assessments conducted by PTS officials;
- consult with the individual's school about their needs;
- correspondence with the parents.

If a young person already has specialist care in place to accommodate their needs, parents should let the PTS team know of these arrangements. We may be able to organise for these carers to accompany the passenger on their journey, at the LBH's expense, thus allowing for continuity for the child.

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8.5 COVID-19

Young people and parents should follow public health advice on when to self-isolate and what to do. National and local guidance is subject to change therefore current guidance at the time will apply with regards to isolating etc.

If a young person develops COVID-19 symptoms, however mild, while at school/post 16 provision, they may be sent home. LBH will not be able to provide travel arrangements in these circumstances. They should avoid using public transport and, wherever possible, be collected by a member of their family or household. In exceptional circumstances, if parents cannot arrange to have the young person to be collected, and it is safe to do so, the young person should walk, cycle or scoot home. If this is not possible, alternative arrangements may need to be organised by the school.

What is transport doing to stop the spread of COVID-19?

In order to combat the spread of COVID-19, LBH has adopted a number of measures. These include but not exhaustive to:

- PAs and drivers wearing the appropriate PPE, such as gloves and face masks;
- PAs and drivers testing regularly, even if they are not displaying any symptoms;
- vehicles cleaned regularly, in particularly when a positive case has been on a vehicle;
- windows opened when possible, to allow the vehicle to be properly ventilated;
- PAs conducting vehicle pre-admittance checks with children/ parents.
- encourage passengers to wear facemasks and other PPE. We understand that this may not be possible for all passengers due to exemptions.

Things to consider

The safety of passengers is main priority of the PTS team. However, in order to provide the necessary arrangements for the numbers of children and young people requiring school travel assistance, we have to group passengers together on communal buses. As described above (section 8.5), there are measures we are putting in place as a local authority to reduce the spread of COVID-19, but there is an inherent risk involved with these sorts of travel arrangements.

Consequently, parents/ young people may wish to make their own arrangements with the support of a PTB (more information in section 6.4). This is the safest way for a child to travel to school. In instances where a young person is already receiving travel assistance from LBH i.e. by taxi, bus, or travel training, but wish to be allocated a PTB instead, it is down to the discretion of the council to determine whether the individual will be allocated a PTB, based on the best use of LBH's resources.

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We do acknowledge that this is not possible for all parents/ young people and in this case, LBH will arrange for travel assistance for those who are eligible. We will endeavour to reduce the risk of COVID-19 to passengers as much as possible, but cannot guarantee their safety in this regard. It is for parents to decide whether they wish for their child to travel on these terms.

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9. Contact Information

Passenger Transport Service (PTS)
Alexandra House - 2nd Floor
10 Station Road
Wood Green
N22 7TR

Email: school.transport@haringey.gov.uk

Contact names and numbers:

Matthew Fisk, *Transport Manager*:	0208 489 2729
Ricky Morris, *Passenger Assistant Coordinator*:	0208 489 6937
Pembe Hippolyte, *Assistant Passenger Assistant Coordinator*:	0208 489 5629
Ilhan Abdurrahmanoglu, *Travel Buddy Coordinator*:	0208 489 1729
Joseph Willis, *Assistant Travel Buddy Coordinator*:	
Vivienne Austin, *Passenger Liaison Officer*:	0208 489 4376
Kathleen Johnston, *Charge Person*:	0208 489 5692

Please note that general enquiries should try to avoid calling at peak times such as 07.00am-am 09.00and 2.30pm-4.00pm. If a query is urgent, the PTS team will endeavour to respond as soon as possible.

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10. Links

Haringey local offer for young people with SEND 0-25

https://www.haringey.gov.uk/children-and-families/local-offer/5-15-year-olds/school-transport

Haringey application page

https://eforms.secure.haringey.gov.uk/ufs/TRANSPORT_AND_TRAVEL.eb?ebd=0&ebp=10&ebz=1_1636535537036

D of E guidance on home to school travel assistance for children

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/772913/Post16_transport_guidance.pdf

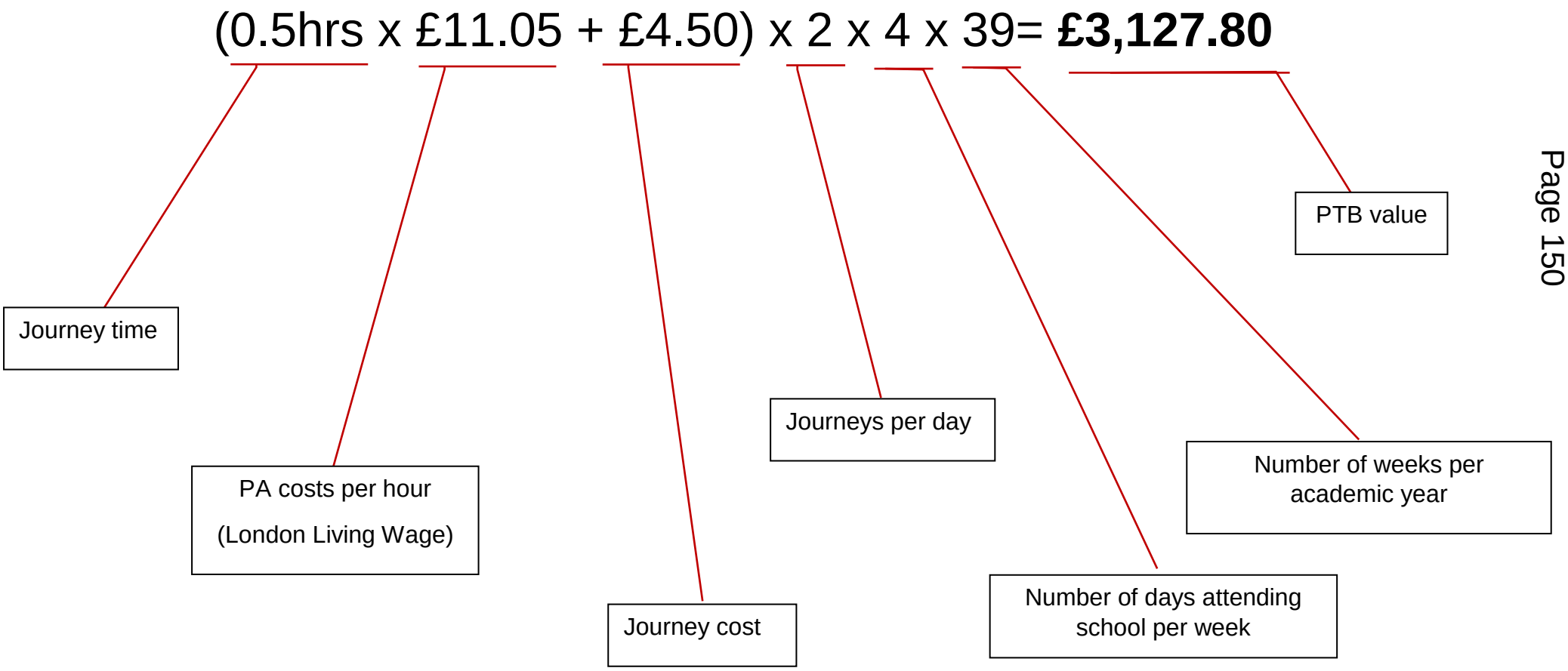
Care act guidance

https://www.gov.uk/government/publications/care-act-statutory-guidance/care-and-support-statutory-guidance

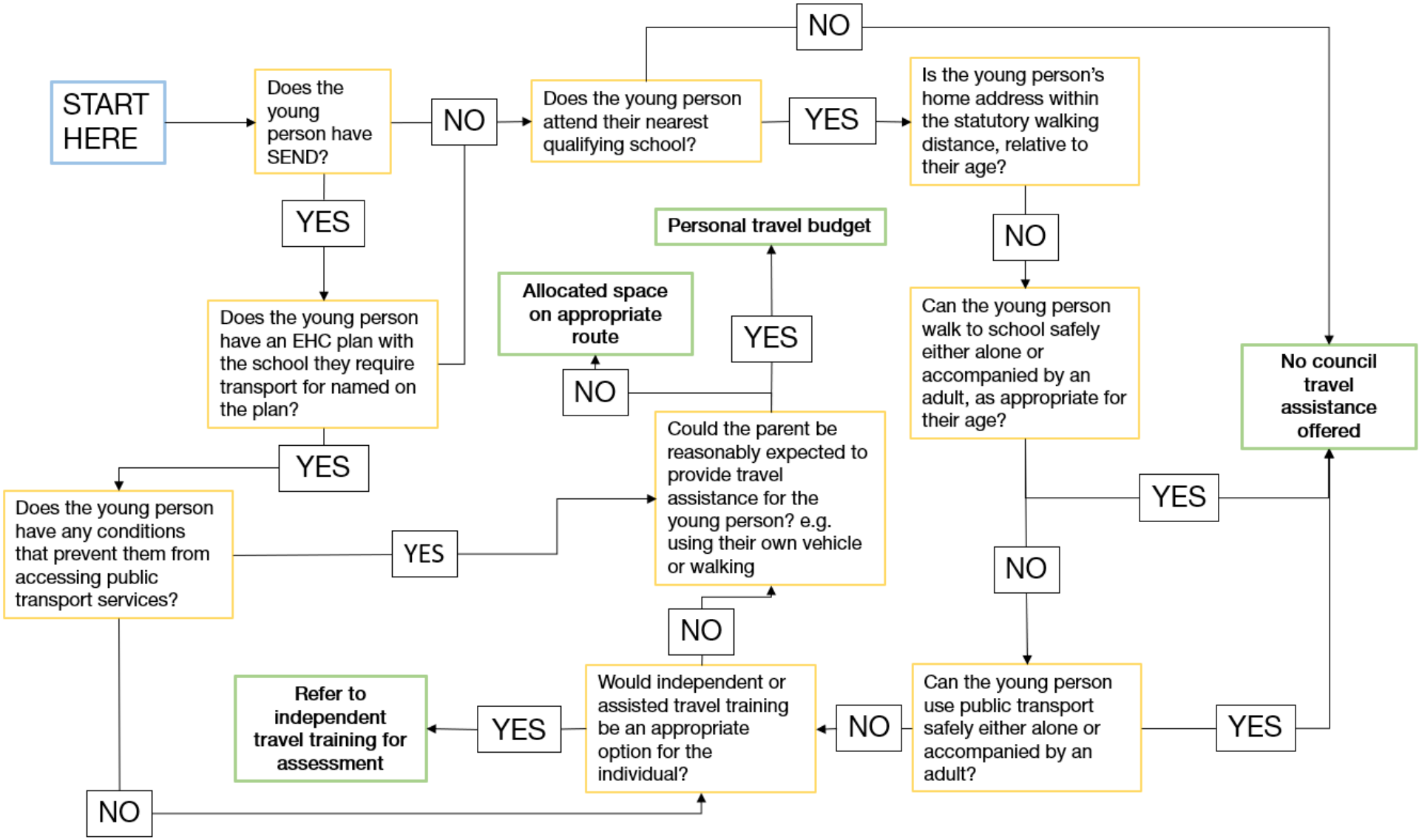
DRAFT

11.1 Appendix A

Scenario 1: the duration of a young person's journey to school is 30 minutes. They travel with a PA and use the train to get to school (which costs £1.50 for the young person and £3 for the PA per journey). The young person attends school 4 days per week, 39 weeks per year.



11.2 Appendix B



11.3 Appendix C

LBH officer declines the school travel application or offers travel arrangements that the applicant considers 'unsuitable'.

Applicant challenges the decision (within 20 days)
Applicant challenges the decision of LBH's officer in writing on the grounds of:

- Entitlement
- Distance measurement
- Route safety
- Consideration of exceptional circumstances

Stage 1 (within 20 days): Review by a senior office at LBH
Senior officer reviews the original decision and sends parent written confirmation of their decision, detailing:

- Reasoning for the decision made
- Notification of option to escalate to a stage 2 appeal

Appeal upheld
Travel arrangements will be put in place for the young person.

Applicant challenges the Stage 1 Decision
Applicant challenges the decision of the Stage 1 appeal in writing.

Stage 2 (within 60 days): Review by an appeal panel
An independent panel (of which the officers involved in the previous two appeals must not be a part of) hears written/ verbal evidence from parent, outlining why the decision of the Stage 1 appeal was incorrect.

Independent appeal panel send decision in writing to parent or carer (5 working days)

Appeal declined
The original decision is supported and travel arrangements will not be put in place. This will include details of how to escalate the case to the Local Government Ombudsman

Appeal upheld
Travel arrangements will be put in place for the young person.

Appendix Four: Proposed Consultation Questions

Proposed consultation exercise 8th May 2022 - 31st July 2022

Assisted Transport Policy 0-16

Assisted Transport Policy 16-25

Haringey Council have reviewed and reviewed their Home-School transport policy to ensure that it follows national guidance and continues to meet the council's objectives regarding sustainable transport. Haringey will collate all responses to consultation via a questionnaire on the Local offer web-site and officers will hold a series of briefings for interested parties particularly for schools, parents and carers of children and young people with SEND.

It is proposed that there are 2 policies which address the different needs and of the children and young and young people concerned and the legislation and guidance which applies to them.

The specific changes within the policy are as follows:

a) consideration of sustainability, focusing on the environment, emissions reduction, and promotion of independent travel options.
b) Changing the title of the policy from 'Transport' Policy to 'Travel Assistance' policy.
c) Creation of a specific policy for young people aged 16-25, including information about external travel support.
d) introduction of behavioural standards for children and young people using transport commissioned by the Local Authority.
e) detailed explanation of the transport decision making process.
f) standardisation of disputes and appeals process in accordance with statutory guidance
g) clarification of 'personal travel budgets' and how they are calculated.
h) comprehensive 'Application' procedure and guidance.
i) clarity around breakfast/ after school clubs and times when Haringey will provide transport.
j) COVID-19 information in relation to home-school transport.

Questions for Consultation:

1. Demographic questions
    - Role -parent/carer/ teacher/ young person/ transport provider/ escort/
    - Postcode
    - Please describe your ethnic origin.
    - Age
    - If responding as a parent/carer, age of your child?
    - Do you (or as a parent/carer of a child – does your child) have SEND? (Yes/No)
    - Do you (or as a parent/carer of a child – does your child) use Transport for London (TfL) services to get to school?

(Yes/No)

- Do you (or as a parent/carer of a child – does your child) use Haringey SEND Transport Services?
  (Yes/No)

2. Is it clear who the policy is for, including the ages of people that it applies to? (yes/no/somewhat, free text box) If no, please suggest why. (Free text box)

3. Are you happy with the move to encourage more environmentally friendly transport? (yes/no, somewhat, free text box for comments)

4. Is there anything further Haringey Council could do to promote environmentally friendly travel? (free text box)

5. Are you happy with the proposed inclusion of behaviour contract in the policy (yes/no/somewhat, free text box for comments)

6. In your opinion does the policy support and promote young people to become independent travellers (yes/no/ somewhat, free text box)

7. If not what else could be added (free text)

8. Please use this space to indicate any improvements in the policy: (free text box)

Promoting Independence, Enabling Mobility:

Haringey's Travel Policy 2018- 2020

For Children & Young people with Special Educational Needs & Disabilities (0 – 25)

&

Adults with a Care Act Eligible Need

VMM Aug 2019 edited date for review, address and complaints process

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Promoting independence, enabling mobility: Haringey's Travel Policy – For Children & Young people with Special Educational Needs & Disabilities And Adults with a Care Act Eligible Need (18 +)

1. Introduction

Haringey Council has developed a single travel policy to cover travel arrangements for all eligible children and young people with a special educational need and or disability and adults in receipt of adult social care and support to facilitate attendance at education and services. This Travel Policy sets out both the policy framework and the procedures for travel assistance including eligibility criteria, entitlement, how parents/carers/service users may apply, how decisions are made and how parents/carers service users may appeal against decisions with which they are unhappy.

The policy offers a single approach to travel assistance for children and young people attending school or college. The aim is to ensure that the service received and the user experience are consistent and that the most efficient, effective and suitable travel assistance is provided. Haringey Council expects all pupils to travel to their education provision by walking where possible, wheel chairing or making use of the free travel available on London Transport. Haringey Council also provides travel arrangements through a variety of options to people with learning disabilities, mental health needs, physical disabilities, frailty and dementia across the borough. This policy outlines how we will move towards a consistent and equitable way of supporting such people in the provision of Council funded travel.

Haringey Council is committed to improving road safety and reducing the environmental impact of vehicle journeys by promoting alternative forms of travel, such as walking, wheel chairing, cycling and use of integrated public transport. Wherever possible, in the provision of travel assistance the Authority will consider travel options for 'eligible children and adults' that lead to reducing the number and length of vehicle journeys.

The policy is intended to provide clarity for parents and service users in a wide range of circumstances, and to ensure that those with particular and significant needs are appropriately supported. References in this Policy to "parents" are to parents, carers or legal guardians. The Policy is divided into two main sections Children and Young people (0 to 18 years) (including continuing learners who started their programme of learning before their 19th birthday) and Adults with Learning Disabilities and Disabilities (18+)

1.1 Background

Our three-year Corporate Plan, Building a Stronger Haringey Together, sets out the vision and priorities for the Council over the next three years. Its underpinning principles of empowering communities to enable people to do more for themselves and promoting equality to enable each young person to thrive and to achieve their potential are reflected in this Travel Policy.

As well as seeking to ensure every child has the best start in life and that adults are enabled to lead healthy and fulfilling lives, the Council is also committed to improving our

environment and to making Haringey one of the most cycling and pedestrian friendly boroughs in London.

This policy has been drafted therefore to promote independence and to enable mobility for children, young people and adults with additional needs and disabilities who may not be able to access mainstream transport without assistance. This policy has been drafted to support wider policy imperatives of independence, personalisation and self-reliance and to ensure that all children, young people and adults are empowered to be as independent aspossible.

This policy offers the opportunity to support a key aim of the Special Educational Needs and Disabilities Reform 2014 which is preparing children and young people with special educational needs (SEN) and disabilities for adulthood. Being supported towards greater independence and employability can be life-transforming for children, young people and adults with SEN. Preparing for adulthood includes preparing for independent living and being as healthy as possible in adult life, themes echoed in Haringey's Health and Wellbeing Strategy with its focus on obesity, long term conditions and mental health and wellbeing and in the Corporate Plan.

2. Policy Statement - Children and Young People

2.1 Introduction

This section of the policy explains the entitlement to travel assistance for children and young people up to the age of 19 (including continuing learners who started their programme of learning before their 19th birthday) and up to 25 **for those who have a statement of Special Educational Needs or an Education, Health and Care (EHC) Plan** and who are in education or training. It has been developed in the context of the Special Educational Needs and Disabilities (SEND) reforms under Part 3 of the Children and Families Act 2014 and a new Code of Practice, the *Special educational needs and disability code of practice: 0 to 25 years* which set out respectively the duties and guidance for local authorities, schools and others in respect of these reforms, including in respect of travel. Under these reforms, there are a number of key principles for children and young people with special educational needs and/or disabilities. The following relate directly to travel assistance:

- To give more importance to the views, wishes and feelings of children and young people and their families.
- To offer support which enables children and young people with SEND to achieve the best possible educational progress, and have choices in their lives as they grow up.
- To ensure the EHC plan is relevant from birth to 25 years where appropriate

The aim of this policy is to support all children, young people and adults with significant SEND to lead lives that are as independent and as free from restriction as possible. The criteria for granting travel assistance will be based on what is best for each person in supporting their development to achieve independent travel.

In light of the above, Haringey Council expects pupils/students to travel to their learning provision using local arrangements by walking, wheel chairing or making use of the free or concessionary travel available on London Transport. This policy sets out in what circumstances Haringey Council will agree home to facility travel assistance.

The Policy does not affect, remove or reduce the legal responsibility of parents to ensure that their children attend school regularly.

The Authority also has a duty to ensure that all arrangements make best use of its resources. If the Authority agrees to provide travel assistance it will be provided in a safe and cost effective manner taking account of the child's specific needs and working closely with parents/carers, schools and other agencies to oversee the application of this policy and the allocation of travel assistance.

This policy is designed to be consistent with the Council's legal obligations as set out in the Government's Home to School Travel and Transport Guidance. If there are any inadvertent differences between this Policy and the underlying legislation, then the legislation will of course take precedence, wherever the legislation imposes a higher duty on the local authority.

The Council must make decisions in accordance with the relevant provisions which are (primarily) in Sections 444, 508A, 508B, 508C, 508D, 509AA, 509AB, 509AC, and 509AD, Schedule 35B of the Education Act 1996 (as inserted by Part 6 of the Education and Inspections Act 2006). The Act provides that a duty to provide free school transport will be owed by the Local Authority to a child of compulsory school age in its area who is an "Eligible Child" and either (i) no travel arrangements relating to travel in either direction between his home and school are provided free of charge by any other person, or (ii) such arrangements are not suitable for the purpose of facilitating attendance at school.

In addition, parent should note their responsibility to ensure that their child/children attend school under Section 444 of the Education Act 1996 – this includes making the necessary travel arrangements to get their child/children to and from school. The initial onus therefore rests with parents to make travel arrangements but to ask for assistance from the Council where this is not possible or where the parent considers that the responsibility should fall on the Council. The Council will make an assessment to identify eligibility for assistance in line with the law and its published criteria as set out in the policy below.

The Council will assist parents with travel arrangements after an assessment has been carried out and it has been proved that the service user meets the criteria outlined in this document.

2.2 Purpose

This policy is aimed at promoting the maximum possible independence for the service user, and sets the criteria that will be used to assess whether the service user's travel needs can be met best through independent travel arrangements or whether assisted travel services are necessary.

2.3 Eligibility Criteria for access to travel assistance

where there are special educational needs, a disability or mobility problems

Eligibility is based on the needs of the child, and not family circumstances such as parental employment responsibilities. However, the Authority may take family circumstances into account when considering the type of travel assistance to be offered provided that it is consistent with the efficient use of resources (including routing).

A child or young person will normally be eligible for travel assistance under this policy if the child or young person:

a) Has a statement of Special Educational Needs or an Education, Health and Care (EHC) Plan; or

b) Has a disability for the purposes of the Equality Act 2010 (e.g a significant learning, physical or sensory disability) or mobility problems; and

c) His/her special educational needs or disability affects his/her capacity to travel independently; and

d) S/he attends a school that the Authority has determined or is named in the Statement or EHC Plan as being the nearest available school that is able to meet the needs of the child

A child or young person may be eligible for travel assistance if the child or young person:

a) Has a Statement or EHC Plan, lives within the statutory walking distance but is unable to travel to school owing to disability or mobility problems (including temporary medical conditions) and family circumstances make it impossible for the parent to take the child to school.

b) Has a significant learning, physical or sensory disability affecting capacity to travel independently

c) Lives further than the statutory walking distance between home and school (ie over 2 miles for children under eight years of age or over 3 miles for children aged eight years old and over)

d) Attends a school that the Authority has determined or is named in the Statement or EHC Plan as being the nearest available school that is able to meet the needs of the child

e) Attends a school chosen by the parents on the grounds of a recognised religion or belief and there is evidence of adherence to that religion and the first preference was for a denominational school and the denominational school is the nearest available for the pupil's age group and the denominational school can meet the needs of the child.

Other than in exceptional circumstance a child or young person <u>will not be eligible</u> for travel assistance under this policy:

a) Where the pupil is not attending their local mainstream school, or the closest special provision or as named in their statement and the school is one of parental preference (except when the preference is on religious or belief grounds – see above).

b) Where the parent has requested that the Statement or EHC Plan names a school that is not the nearest available school able to meet the child's needs as deemed by the Authority.

c) When travel assistance is being requested solely to facilitate attendance at school. It is a parental responsibility to ensure their child/children attend school regularly.

d) For Pupils aged 14 or older who have a Statement or EHC Plan, vehicular transport (school bus or taxi) will not be offered. If the statutory walking distance criteria are met, then the Authority may offer petrol reimbursement for parents or a travel card. Examples of exceptional circumstances where the pupil would be eligible for travel assistance under this

policy would include where the pupil had severe learning difficulties or profound and multiple learning and physical disabilities.
e) Children in Early Education Settings/Pre-school Children under the age of 5 are eligible to travel free on public transport when accompanied by a fare-paying passenger. An example of exceptional circumstances where the child would be eligible for travel assistance under this policy would include where there is a profound need for such assistance.

f) For young people over the age of 19 attending further education, provision of transport will be the responsibility of Haringey Council's Adult Care Services (ACS). Such arrangements will form part of their transition into adulthood plan.

g) When travel assistance is being requested solely because a child is being raised by a lone parent.

h) When travel assistance is being requested solely because a parent or parents are disabled for the purposes of the Equality Act 2010. An example of exceptional circumstances where the child or young person would be eligible for travel assistance under this policy would be where the parent(s) can demonstrate with medical evidence that they have a disability which prevents them from accompanying their children along a pedestrian route, in circumstances where adult accompaniment is necessary to make the route safe.
i) Where a child does not have a Statement or an EHC Plan and cannot attend school for a diagnosed medical condition. For further information, the parent will need to contact Haringey Council Customer Services.

Where families of children likely to be affected by this policy live at more than one address, they must be clear which home is the child's main home for travel assistance purposes. The Council may require proof that this address is the child's main home as travel assistance will not automatically be provided in respect of more than one home.

2.4 Travel beyond statutory walking distances

Local authorities must provide free home to school travel assistance for children aged between 5 and 16 years if their nearest suitable school is further away than the statutory walking distances, which are:

- 2 miles for pupils aged under 8
- 3 miles for those aged 8 and over.

Special educational needs, a disability or mobility problems eligibility -

Local authorities should make transport arrangements for all children who cannot reasonably be expected to walk to school because of their mobility problems or because of associated health and safety issues related to their special educational needs (SEN) or disability. Eligibility, for such children should be assessed on an individual basis to identify their particular transport requirements.

Accompaniment -

In determining whether a child cannot reasonably be expected to walk for the purposes of 'special educational needs, a disability or mobility problems eligibility' or 'unsafe route eligibility', the local authority will need to consider whether the child could reasonably be

expected to walk if accompanied and, if so, whether the child's parent can reasonably be expected to accompany the child.

The general expectation is that a child will be accompanied by a parent where necessary, unless there is a good reason why it is not reasonable to expect the parent to do so.

Suitable School –

A 'suitable school' is defined as "a school with places available that provides education appropriate to the child's age, ability and aptitude and to any special educational needs the child may have".

Please note however, that if parents choose a school which is further away than a suitable one where a place is available and that chosen school is beyond the statutory walking distances from their home, they will be responsible for their own travel assistance.

2.5 Nature of the Route

Local authorities are required to offer travel assistance to children registered at a school within statutory walking distance of their home but, having regard to the nature of the routes which they could reasonably be expected to walk, cannot reasonably be expected to walk them, and no suitable arrangements have been made to enable the child to attend a nearer school.

2.6 Travel to Alternative Provision

Pupils aged 14-15 who have been placed in alternative provision by their school are expected to make use of free travel on buses and trams operated by Transport for London. However, pupils can apply to the governing body of their school to cover the costs of travel on the London Underground or Overground network if:

- a journey by bus will take longer than an hour during peak hours as calculated using the TFL Journey Planner (http://journeyplanner.tfl.gov.uk/user/XSLT_TRIP_REQUEST2?language=en); or
- they consider there are other circumstances which make a journey by bus unsuitable

Pupils aged 14-15 who have been placed in alternative provision by Haringey Council are expected to make use of free travel on buses and trams operated by Transport for London. However, pupils can apply to Haringey Council to cover the costs of travel on London Underground or Overground network if:

- a journey by bus will take longer than an hour during peak hours as calculated using the TFL Journey Planner (http://journeyplanner.tfl.gov.uk/user/XSLT_TRIP_REQUEST2?language=en); or
- they consider there are other circumstances which make a journey by bus unsuitable

Where the pupil is unable to travel to the alternative provision then Haringey Council will facilitate transportation

2.7 Individual circumstances

Where there are reasons relating to the child's health or social needs (as supported by documentary evidence) which Haringey Council deem as exceptional, travel costs will be met or travel arrangements will be made. Each case will be considered on an individual basis bearing in mind the individual circumstances of each particular case.

2.8 Free school Meals

Pupils are entitled to free travel assistance where they are entitled to free school meals or their parents are in receipt of maximum Working Tax Credit if the nearest suitable schools are:

Beyond 2 miles (for children over the age of 8 and under 11).

Between 2 and 6 miles (if aged 11-16 and there are no more than three suitable nearer schools).

Between 2 and 15 miles and is the nearest school preferred on the grounds of religion or belief (aged 11-16).

2.9 Parental preference for particular schools

on the grounds of religion or belief

A child or young person will normally be eligible for travel assistance under this policy if:-

- The child or young person attends a school chosen by the parents on the grounds of a recognised religion or belief
- There is evidence of adherence to that religion by the parents
- The parents' first preference was for a denominational school
- The denominational school is the nearest available for the pupil's age group
- The denominational school can meet the needs of the child.

2.10 Children with Special Educational Needs and or Disabilities (SEND)

This section explains what travel assistance will be provided for children and young people with a Statement of Special Educational Needs (SEN) or disabilities or an Education Health and Care Plan, or with mobility problems, if they could not reasonably be expected to travel to school/college independently and even if the journey is within the statutory walking distance described above.

Having a Statement of Special Educational Needs or an Education, Health and Care Plan does not necessarily provide entitlement to free travel. Requests will be considered for children with special educational needs, a disability as defined by the Equality Act 2010 or mobility problem, who:

- Live within the statutory walking distance, but cannot reasonably be expected to walk to the school ; and

- Cannot be placed by the Local Authority at a suitable school nearer to his/her home;
- Have needs such that public transport is not a suitable method for them of travelling between their home and the school.

If possible, Haringey Council will always aim to enable children to walk, wheel or use public transport independently by the age of 16 or earlier.

The entitlement to travel assistance for children and young people who meet these criteria varies according to their age group as follows:

- Pre-School children with a statement of SEN under the age of 5

There is no legal requirement for the Local Authority to provide travel assistance for children under the age of 5 to travel between home and school. The LA expects that children under the age of 5 will be taken to their educational provision by a parent.

Children under the age of 5 can travel free at any time on the Underground Railway (tube), Docklands Light Railway, buses, trams, London Overground, and Emirates Air Line cable car, as long as they are accompanied by an adult with a valid ticket.

In exceptional circumstances, where a child has a statement of special educational needs, the Local Authority will provide travel assistance, after looking at the individual circumstances and the individual merits of the particular case,

For children without a statement of SEN and are not eligible for LA travel arrangements, Haringey may offer support, depending on availability.

- Children with SEND aged 5-16

The Local Authority will make a decision for children with a Statement of Special Educational Needs, an Education, Health and Care Plan, or disabilities as defined in the Equality Act based on a number of key factors which include:

- distance from home to school; and
- the needs of the child (whether the child has physical, learning and/or mental health needs which mean they cannot walk or access public transport);

Any travel assistance will only be provided for travel to a qualifying school.

A qualifying school means one that can meet the child's needs and is nearest to their home. The Local Authority is not obliged to pay the travel assistance costs for a child to travel to a school, if a school nearer to the child's home can meet the child's needs. If the parent(s) expresses a preference for a school which is further away, the presumption would be for parent(s) to pay the costs of travel arrangements in respect of that school. However, in deciding whether to pay these costs, each case will be considered by the Council on an individual basis bearing in mind the individual circumstances of each particular child or young person.

- Children and young people with SEND aged 5-19 in educational residential placements

A residential school is a specialist provision which caters for pupils with special educational needs and/or disabilities, who receive overnight accommodation (usually over a 38 week period).

Haringey Council will reimburse the parents their reasonable costs of accompanying their child to and from school via public transport. The costs of second-class, not first-class, train travel will be reimbursed. Reimbursement will be made for journeys taken at the start and end of term, of half term holidays and for parents to attend the Annual Review meeting. Reimbursement will be dependent on production of valid receipts.

Parents may wish to transport their child to school by car. Where Haringey Council agrees to this arrangement, the parent will be reimbursed their reasonable fuel expenses, if this is an additional/different journey to that undertaken to take other children in the family to their schools. In the event of illness of the parent then they should accept full responsibility and make alternative arrangement to transport their child to and from school.

- Young people and adults with SEND aged 16 – 25

For young people with statements of SEN or Education Health and Care Plans who move from schools to Further Education colleges at age 16, and who were given travel assistance support until the end of their school studies, travel assistance provision will be reviewed. Where Haringey Council has decided that it is necessary to continue to provide travel assistance, it will, in addition, consider whether it is necessary to provide an escort to supervise the young person's journey. This will depend on, amongst other matters, their age and general behaviour.

The majority of Haringey Council pupils with a Statement of SEN or EHC Plan do not receive or require specialised travel assistance from the Authority. Wherever possible the Authority expects parents of pupils with a Statement of SEN or EHC Plan to make arrangements for their child to attend school in the same way as for parents of pupils without a Statement of SEN, as this is an important factor in developing the pupil's independence, social and life skills. To assist with facilitating independence, young people of compulsory school age (including students in full time education up to the age of 18 years) are entitled to free travel on buses and trams operated by Transport for London. Young people with special educational needs and/ or disabilities where free travel on buses and trams is not suitable,

but where there is a long term plan to achieve as much independence as possible, including travel, will be eligible for travel assistance.

2.11 Travel Assistance Allocation

Haringey Council will allocate travel assistance in the most cost-effective manner. Pupils will be expected to travel with other children attending the same, or nearby school, unless there are compelling reasons for individual travel, (eg no travel sharing options available, significant challenging behaviour and/or significant medical needs). The Local Authority where agreed will provide home to school travel collecting identified children and young people from agreed designated pick up points or bus stops and where not appropriate then from designated home addresses.

Haringey Council has an ongoing responsibility to ensure value for money. Therefore, the mode of travel assistance offered will be regularly reviewed, and will not necessarily remain the same for the duration of eligibility.

Generally, travel provision will not be made other than at the beginning and end of the normal school day. However, there are some instances where this can be waived if this will benefit the young person's educational development (for example, where a child has to attend an after school class as part of their education, or related work experience/ examinations at a different location other than the school). In cases of exclusion, illness etc, when a child has to go home during the course of the school day the school's governing body, or parent would be responsible for travel.

Where the Authority decides to issue a travel card, it will be available for collection at the beginning of each term from the education establishment that the child attends. In order to collect a travel card, the pupil and/or parent must present a current photo card.

2.12 Pickup and Drop off

The Council where agreed will provide pick up and drop off, collecting identified service users from agreed designated group pick up points or bus stops. The vehicle will arrive at the designated pick up or drop off point at agreed times [+/ 5 minutes]. Parents/carers who bring the service user late to the drop off point will be expected to bring the service user to the school or centre themselves.

2.13 Entitlement

Standard

Children in Early Education Settings or pre-school who are under the age of 5 years are eligible to travel free on public transport when accompanied by a fare-paying passenger.

For large numbers of children, getting to school will be a reasonable and safe travel experience, which will also help in promoting their independence and physical wellbeing. In addition, children:

London Transport for Under 5s: Children under five can travel free at any time on the Tube, Docklands Light Railway (DLR), buses, trams and London Overground as long as they are accompanied by an adult with a valid ticket.

London Transport for 5 to 10-year-olds: Children aged five to ten can travel free at any time on buses, Tube, DLR, trams and London Overground as long as they travel with an adult who has a valid ticket. Up to four children can travel free with one adult. Children aged 5 to 10 who are travelling unaccompanied on the Tube, DLR or London Overground will need a 5-10 Oyster photocard to travel free.

London Transport for 11- to 15-year olds: Children aged 11 to 15 years can travel free on buses and trams and at child rate on Tube, DLR and London Overground services, provided they have an 11-15 Oyster photocard.

London Transport for 16 - 18s: 16 and 17-year-olds can travel at a child rate on buses, Tube, DLR and trams, provided they have a 16+ Oyster photocard. 16 to 18 year-olds who live in a London borough and are in qualifying free time education can also apply to get free travel on buses and trams.

Non Standard

Transport for London provides free bus passes for all children under the age of 16, and so it is worth remembering that Haringey Council will not need to make any additional arrangements for the vast majority of the children in its area.

The Local Authority is not required to provide free travel for pupils who attend schools outside the statutory walking distance if there is a suitable place available at a nearer appropriate school. Whilst the wishes of parents are an important consideration, they are not the only legally recognised criterion in determining decisions by the Council on support for travel.

2.14 **Transport policy statements for 16 – 19 year olds -**

Transport policy statements for young people of sixth form age and adults aged 19 and over (including those with an Education, Health and Care (EHC) plan) in education and training

The duty applies to all local authorities in England in respect of arrangements for young people (over compulsory school age) aged 16-18 and those continuing learners who started their programme of learning before their 19th birthday.

Alternative means of facilitating attendance at establishments

Local authorities should consider alternative, safe means of facilitating attendance at establishments of education or training. Suitable and appropriate alternatives may include transport solutions, for example:

- independent travel training to enable young people (often with special educational needs and disabilities) to travel on public transport independently.

2.15 **Bursary Fund –**

students may be able to get support direct from schools and colleges.

3. Policy Statement - Adults

3.1 Introduction

As set out in the Care Act 2014, the core purpose of adult care and support is to help people to achieve the outcomes that matter to them in their life. The Act and its supporting statutory guidance set out how a local authority should go about performing its care and support responsibilities in light of this and also set out the need to ensure that doing so focuses on the needs and goals of the person concerned. In particular, local authorities must promote wellbeing when carrying out any of their care and support functions in respect of a person. This may sometimes be referred to as "the wellbeing principle" because it is a guiding principle that puts wellbeing at the heart of care and support. The wellbeing principle applies in all cases where a local authority is carrying out a care and support function, or making a decision, in relation to a person. It applies equally to adults with care and support needs and their carers.

This section of the Policy has been drafted in light of the Care Act 2014 and the wider focus on promoting wellbeing, preventing, reducing or delaying needs of adults for care and support, and of carers for support and providing information and advice in relation to care and support for adults, and support for carers. The Act highlights the need for complementary approaches across all areas of provision which support independence and promote self-reliance.

Purpose

This policy is aimed at promoting the maximum possible independence for the service user, and sets the criteria that will be used to assess whether the service user's travel needs can be met best through independent travel arrangements or whether assisted travel services are necessary.

Scope

This part of the policy covers adults (18 or older) with the exception of those adults aged 25 or lower who have a special educational need and /or disability and are in education or training . Those adults aged 18 – 24 years with a special educational need and/or disability who are in education or training are covered under section 2 of this policy.

This is not a general policy regarding transport; it is specifically for travel arrangements required to access services or support identified as part of an adult social service funded care package.

3.2 Policy Principles

Haringey's aim is to support the promotion of independence through the provision of Travel Training and by developing community involvement. Wherever possible the Council expects service users to utilise public transport as this is an important factor in developing the

service user's independence, social and life skills and this policy rests upon a general expectation that service users will meet their own needs for travel to access and take advantage of existing services or support wherever possible.

Travel arrangements are a means of accessing social care services or support. The overriding principle is therefore that the decision to provide travel support is made in order to enable needs for care and support to be met and to promote independence.

Funded travel will only be provided if, in the opinion of the assessor, it is the only reasonable means of ensuring that the service user can safely access an assessed and eligible service. It is not available to attend routine health appointments unless it is part of an agreement with the relevant health authority.

The need for travel arrangements must be part of the initial assessment of an individual's needs for care and support and travel arrangements can only be provided where the individual is eligible for a service as set out in the Care Act 2014 and travel arrangements are required to enable the needs for care and support to be wholly or partly met and after all travel options have been considered. An individual's use of Personal Independence Payment (PIP) (mobility component) and other transport concessions will be considered when determining whether travel support should be funded.

Travel arrangements should not be offered as an incentive to take up a care package.

Where there are appropriate travel options available (either personal or public transport), it will be assumed that the service user will use this as a first option. Travel will only be supported if alternatives are unavailable or inappropriate for some reason.

3.3 Eligibility

This policy is for those people assessed as eligible for adult social care. As a general principle: -

Travel arrangements will be considered if: -

- No suitable public transport is available
- No other modes of travel are available for example walking, access to a personal car or a vehicle funded through the Motability Scheme
- The service user is not able to use public or community transport for health or other identified reasons
- The family or other carer is not able to support travel arrangements
- There would be an unreasonable additional responsibility on family or other carer
- In the opinion of the assessor, it is the only reasonable means of ensuring that the service user can safely access an assessed and eligible service.

3.4 Charging

The policy recognises that there may be charges for the provision of travel arrangements as part of a care package which also attracts charges. These would only be applied following a financial assessment and would form part of any charges applied to the provision of the

care package overall. These charges would be made in line with the Charging Policy in place at the time and may be subject to amendment.

The Council will always ensure that when there is a choice of travel options which adequately meet the individual's needs, the most sustainable and cost efficient one will be chosen.

3.5 Roles and Responsibilities

As part of the Council's commitment to inclusion and independence, individuals who can travel to community activities, day opportunities and college independently or with assistance from family, friends or support providers will be encouraged and expected to do so.

The Council will allocate travel arrangements in the most cost-effective manner. Where a number of individuals are accessing the same or close by services the provision of shared travel arrangements should always be considered. Service users will be expected to travel with other service users attending the same, or nearby centre, unless there are compelling reasons for individual travel arrangements, (e.g. no sharing or community based options available, significant challenging behaviour and/or significant medical needs).

The Council has an ongoing responsibility to ensure value for money. Therefore, the mode of travel assistance offered will be regularly reviewed, and will not necessarily remain the same for the duration of eligibility.

The assessment and provision of travel assistance should be reviewed on a predetermined basis, e.g. at the annual review.

Concessionary Travel

Individuals who qualify for concessionary travel will be expected to apply for and use this as and when appropriate according to assessed needs. Where the Council decides to issue a travel card, it will be available for collection from the establishment that the service user attends. In order to collect a travel card, the service user and/or parent/carer must present a current photo card.

3.6 Risk Assessment

Service users who are assessed and successfully travel trained will only be expected to travel independently if the Council considers it is appropriate and safe for them to do so. The capacity to travel independently will always be subject to a risk assessment and the service user and or carer may decide to travel independently and disagree with the assessment made by the Council.

When assisted travel is provided the Council will ensure that providers are on an approved list of contractors, drivers have enhanced DBS clearance and have received passenger assistance training and any other training necessary for travel, in particular, in respect of service users with very specialist needs. As the Council continually strives to achieve value

for money, transport providers change. However any change will only be made after consultation with the service user, carer and care manager.

3.7 Personal Budgets

The assessed travel need will make up part of the service user's personal budget. This can be taken as a direct payment or as a Council managed service. Service users can pool their budgets to meet their travel needs. The personal budget can be used to purchase travel assistance options.

4. Travel Assistance Options

Where travel assistance is agreed, it may take one of the following forms:

a) An allocated **Personal Budget** for parent to arrange travel assistance themselves

b) **Support Worker/Escort** to provide travel assistance

c) Provision of a **bus pass for a parent or responsible adult** (of parent choice) to accompany the child to/from school.

d) **Travel Training** – to be supported to gain confidence and independence; is a gradual process which finishes with unaccompanied journeys.

e) **Travelmate** – peer accompanied journeys

f) **Walking Bus** - A community walking bus scheme led by a volunteer or parent(s) taking groups of people to their destination where it is practical and local.

g) **Reimbursement of mileage costs** for parents who are deemed able to transport their children to school in accordance with Her Majesty's Revenue & Customs (HMRC) directions.

h) **Car Share Scheme.** A lift may be provided through a car journey matching service where a parent already driving a similar route, has room and is willing to provide a lift to someone else. In these circumstances the driver may be paid a mileage rate in line with HMRC's directions.

l) **ZipCar scheme** is a car club that gives the driver access to the car or van s/he needs when s/he needs it.

j) **Passenger Transport Service** (PTS) coordinates School travel for children, and for young people up to 25 years with special educational needs and disabilities, as long as the passenger is able to walk unaided or with support, is a wheelchair [or buggy] user or can transfer to a seat It also provides transport for children looked after by the Council, irrespective of where the child lives (in or out of borough).

k) **Pooled Budget/Individual Service Fund** – using personal budgets jointly for example to hire a Minibus.

l) **Community Ride** scheme (along the lines of the community ambulance schemes) provided through a commissioned voluntary agency

m) **Dial-a-Ride** membership is open to people with a permanent or long-term disability which prevents them using scheduled public transport services.

n) **Taxicard** is a service that allows Haringey residents, with a mobility impairment that prevents them from using buses or trains, to travel in licensed radio taxis or black cabs at lower rates.

o) **Licensed Taxi** - In exceptional circumstances, travel assistance may be provided by licensed taxi with or without a passenger assistant.

5. Quality and Performance of the Policy

The effectiveness of the delivery of the policy will be measured through some Key Performance Indicators (KPI's) focusing on:

1. Improved range of travel assistance options
2. Take up of travel assistance options
3. Usage of Freedom Pass
4. Reduction in money spent on higher cost travel assistance
5. Amount of concessionary travel
6. Numbers travelling in integrated groups
7. Measurement of improvement in Levels of travel independence (5-point scale with criteria).

6. Safeguarding Requirements

It is the responsibility of the individual local authority to ensure the suitability of its employees and any contractors or their employees by undertaking the required safeguarding checks on those whose work or other involvement will bring them into contact with children, or more widely, vulnerable adults. This should include bus drivers, taxi drivers and escorts, as necessary.

The Criminal Records Bureau (CRB) and the Independent Safeguarding Authority (ISA) have merged to become the Disclosure and Barring Service (DBS). All transport staff have enhanced DBS checks.

7. Training Requirement –

Local authorities should ensure that all drivers and escorts taking pupils to and from school and related services have undertaken appropriate training, and that this is kept up to date. It is also considered good practice for those responsible for planning and managing school transport to have undertaken appropriate equality training. This training could consist of (but is not restricted to):

- an awareness of different types of disability including hidden disabilities;

- an awareness of what constitutes discrimination;

• training in the necessary skills to recognise, support and manage pupils with different types of disabilities and certain behaviour that may be associated with such disabilities;

• training in the skills necessary to communicate appropriately with pupils with all types of different disabilities, including the hidden disabilities and

- Training in the implementation of health care protocols to cover emergency procedures

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8. Poor behaviour on school buses/other modes of transport

The Transport team expects each school to promote appropriate standards of behaviour by pupils on their journey to and from school through rewarding positive behaviour and using sanctions to address poor behaviour. The Education and Inspections Act 2006 empowers headteachers to take action to address unacceptable behaviour even when this takes place outside the school premises and when pupils are not under the legal control of the school, but when it is reasonable to do so.

Local authorities have adopted a policy of withdrawing transport, either for a temporary period, or permanently for more serious or repeated cases of misbehaviour. Equally, the behaviour of pupils outside school can be considered as grounds for exclusion. This will be a matter of judgment for the Headteacher.

9. Reviews, Appeals and Complaints - Children and Young People

The SEN Transport Team, in discussion with colleagues in SEN, will keep under review the eligibility criteria for travel assistance and/or the type of travel assistance which is provided. Reviews will occur:

a) Annual Review. Every pupil with a Statement of SEN or EHC Plan will have an Annual Review, held at the school, to discuss progress towards targets and support requirements. Travel assistance will form part of this discussion.

b) When a pupil makes progress towards independence and is deemed capable of independent travel by school/college staff and/or parents.

c) When there is a significant change to the pupil's SEN, since the time of first application, rendering them no longer eligible for travel assistance.

d) If the Council decides to cease to maintain a Statement of SEN or EHC Plan . Travel assistance will be ceased.

e) At the Passenger Access Transport Services' annual review of transport routes. Prior to the start of each academic year, existing transport routes will be reviewed and where necessary changes will be made.

f) If a child moves from one education establishment to another. Travel assistance will not automatically continue, and parents must reapply.

g) if there is a change in other circumstances that affect eligibility.

h) If there is a change of home address. Distance between the home address and the school will be recalculated and may change eligibility for travel assistance.

9.1 Appeals

The Council will write to parent/carers to tell them if travel assistance will be given and what arrangements will be made. If parents are not satisfied with the decision, in whole or in part,they may wish to challenge a decision about:
• the transport arrangements offered;
• their child's eligibility;
• the distance measurement in relation to statutory walking distances; and
• the safety of the route.

Stage one:
Review by a Senior Officer –

Parents who wish to appeal should first write to;

Transport & Travel Contract Team Manager
Level 2, 10 Station Road

London N22 7TR

• A parent has 20 working days from receipt of the local authority's home to school transport decision to make a written request asking for a review of the decision.

• The written request should detail why the parent believes the decision should be reviewed and give details of any personal and/or family circumstances the parent believes should be considered when the decision is reviewed.

• Within 20 working days of receipt of the parent's written request the **Transport & Travel Contract Team Manager** reviews the original decision and sends the parent a detailed written notification of the outcome of their review, setting out:

• the nature of the decision reached;

• how the review was conducted (including the standard followed e.g. Road Safety GB)

• information about other departments and/or agencies that were consulted as part of the process;

• what factors were considered;

• the rationale for the decision reached; and

• information about how the parent can escalate their case to stage two (if appropriate).

Stage Two:
Review by an independent appeal panel – SEN Panel

Any parent still dissatisfied with the outcome of a stage 1 appeal should write again to;

SEND Panel
2nd Floor, Alexandra House
10 Station Road
Wood Green
N22 7TR

A parent has 20 working days from receipt of the local authority's stage one written decision notification to make a written request to escalate the matter to stage two.

Within 40 working days of receipt of the parents request an independent appeal panel considers written and verbal representations from both the parent and officers involved in the case and gives a detailed written notification of the outcome (within 5 working days), setting out:

• the nature of the decision reached;
• how the review was conducted (including the standard followed e.g. Road Safety GB);
• information about other departments and/or agencies that were consulted as part of the process;
• what factors were considered;
• the rationale for the decision reached; and
• information about the parent's right to put the matter to the Local Government Ombudsman (see below).

The independent appeal panel members should be independent of the original decision making process (but are not required to be independent of the local authority) and suitably experienced (at the discretion of the local authority), to ensure a balance is achieved between meeting the needs of the parents and the local authority, and that road safety requirements are complied with and no child is placed at unnecessary risk.

Local Government Ombudsman – There is a right of complaint to the Local Government Ombudsman, but only if complainants consider that there was a failure to comply with the procedural rules or if there are any other irregularities in the way the appeal has been handled. If the complainant considers the decision of the independent panel to be flawed on public law grounds, the complainant may also apply for judicial review.

10. Adults: Complaints

When an annual review of a care and support plan is carried out, travel needs will be taken into account.

Where a review/re-assessment identifies that assisted travel is no longer the best way to meet an eligible need, a time limited transition period of up to one month will be allowed so that alternative arrangements can be made according to needs and circumstances if required.

In all other circumstances, provided all other travel options have been considered, evidenced and recorded, assisted travel will then be considered.

All requests for assisted travel will be approved as part of the service package by Team Manager, Service Manager or Head of Service according to delegated responsibilities.

Where clients move from Children's to Adult Social Care services, then their needs will be reassessed by Adult Social Care in relation to the new services required with no assumptions made regarding automatic continuation of any assisted travel.

Appeals

The Council will write to the service user to inform them if travel assistance will be given and what arrangements will be made. If the service user is not satisfied with the decision , in whole or in part, or travel arrangements proposed by the Council, they have the right to appeal.

Appeals should be made within 15 working days of receipt of the decision from the Council. Service users who would like to seek support and information from an independent source in preparing evidence to present in their appeal will be put in touch by the Council with community based support. During an appeal, travel assistance will not be provided (although it will continue for those service users where a change is being recommended when travel assistance currently exists).

Stage One
Service Users who wish to appeal should first write to the Travel ad Transport Service Manager at:-

Haringey Council
Alexandra House, 2nd Floor, 10 Station Road, Wood Green, N22 7TR

Service Users should provide further information/clarification as to why travel assistance is required , if they are appealing against the refusal of travel assistance, and why they feel unable to undertake this responsibility themselves. If they are appealing against the decision concerning what arrangements will be made they should explain why they consider these arrangements inappropriate. They should give details of any personal and/or family circumstances they believe should be considered when the appeal is heard.
On receipt of an appeal, the Manager of the service will present the case to the Special Educational Needs Panel for re-consideration. Service Users will be informed of the outcome by letter or e-mail.

Stage Two
Any service user still dissatisfied with the outcome of a stage 1 appeal should write again to:-

Haringey Council
Alexandra House, 2nd Floor, 10 Station Road, Wood Green, N22 7TR

days of receipt of the stage 1 appeal outcome decision

Service users should explain in writing why they are dissatisfied with the stage 1 appeal decision. Stage 2 appeals will be considered independently of the special educational needs service and will be reviewed by the relevant Assistant Director for the service in adults or children's service.

A letter detailing the outcome will be sent to the service user. Decisions at this stage are final. Passenger Transport Service (PTS) Complaints should be made to:

Passenger Transport Service (PTS)
Alexandra House [Level 6]
10 Station Road
Wood Green
London
N22 7TR

10.1 Corporate complaints procedure

If you would like to make a complaint please complete our online feedback form at http://www.haringey.gov.uk/contact/council-feedback/complaints-about-council

The council's corporate complaints procedure has two stages:

10.2 Service investigation – this is detailed above

When we receive your complaint, we will try to sort out the problem straight away. If we can't:

- we will write to you within two working days to let you know who is dealing with your complaint
- a senior manager will reply to you in writing within 15 working days

If we need more time we will let you know and give you a new date for our response.

10.3 Independent review

If you are not happy with the response you received, please contact the Feedback and Information Governance Team (FIG) to explain why. FIG is independent of the service departments and Homes for Haringey and their investigations are impartial and on behalf of the Chief Executive. FIG will try to resolve the matter, but may investigate further, in which case they will:

- write to you within two working days to let you know who is dealing with your complaint
- reply to you in writing within 25 working days
- usually offer you escalation to the Local Government Ombudsman

If they need more time they will let you know and give you a new date for their response.

Appendices

APPENDIX 1

How to Access SEN School / College Transport

Travel Assistance Application –

For your child's school transport application, please try either of the following links below:

www.haringey.gov.uk/schooltransport

or

Go to council home page; www.haringey.gov.uk then click on 'Children & Families' and then 'Local Offer' and you will see a link to 'School Transport'

Report for: Cabinet – 8 March 2022

Title: Early Years Strategy

Report authorised by: Eveleen Riordan, Assistant Director Schools and Learning

Lead Officer: Nick Hewlett, Principal Advisor for Early Years Quality, nick.hewlett@haringey.gov.uk

Ward(s) affected: All

Report for Key/ Non Key Decision: Key Decision

1. Describe the issue under consideration

1.1 The purpose of this report is to seek Cabinet's agreement to move to consultation on proposals for the Early Years Strategy. The strategy has come out of the Early Years review as there is no current strategy and we need one to consolidate and clarify our focus over the next five years.

1.2 The proposals have been developed by officers, working with stakeholders, including governors, head teachers, the early years sector and professional partners.

1.3 The implementation of an Early Years Strategy is subject to statutory consultation and therefore permission is being sought from Cabinet to carry out a formal consultation with service users, stakeholders and residents on the basis of the strategy contained within this report.

2. Cabinet Member Introduction

It is well-established that a child's early years experiences can influence their development and outcomes in life. Providing high quality early education and childcare, and ensuring there is early intervention for children who are vulnerable or who have special needs, is therefore of great importance, and is a priority for this administration. The Council has a strong record in directly providing this high quality provision, and of supporting other providers in this work, with over 99% of settings graded good or outstanding by Ofsted. A strategy to shape and strengthen the service, which supports children, parents, carers and families is long overdue, and I am pleased to bring this report and the draft strategy to Cabinet.

3. Recommendations

Cabinet is asked:

3.1 To approve the commencement of a statutory consultation on the Early Years Strategy (attached at Appendix 1).

3.2 To approve a 90 day period of consultation to commence in May and end in August 2022.

3.3 To agree that a report on the outcome of the consultation and final proposals for the Early Years Strategy will be submitted to Cabinet in November 2022.

4. Reasons for decision

4.1 Following the Early Years review stakeholders felt that the lack of a dedicated Early Years Strategy led to inconsistency of approach and a reduced focus on the importance of intervening in the early years. The strategy will give a clear focus on early years and provide a distinction between Early Years and Early Help.

4.2 The Early Years Strategy would ensure that there is more focus on the developmental benefits of prevention and universal support in the early years.

5. Alternative options considered

5.1 To continue without a strategy; however, was rejected as the strategy will give a clear focus to improving outcomes for the youngest children in the early years and developing wide partnerships across the early years sector. A strategy will enable us to set out aims and priorities and ensure there is a monitoring process in place to keep us on track to achieve them.

5.2 Funding for early years provision could be at risk without the outcomes, priorities and benefits being clearly articulated through a strategy.

6. Background information – Early Years review

6.1 From July 2021 – December 2021 an Early Years Review was completed with key stakeholders which set out to:

- Review what we currently offer for children and families 0 – 5 years in an inclusive and comprehensive way
- Propose a joined up Early Years approach and strategy that would meet the needs of local residents and families, deliver our statutory duties, improve outcomes and best utilise the assets and resources available.

6.2 The Early Years review identified four key strands of work:

- Development of an Early Years Strategy for Haringey
- Current delivery arrangements and scope of the children's centres
- Sustainability of Haringey's Nursery Schools and their role in supporting quality improvement and system leadership
- Early education and childcare provision in the borough.

6.3 Working groups with a range of partners and stakeholders were established to develop priorities and sets of options for action, with an Early Years Reference Group and Strategic Oversight Group providing robust scrutiny and challenge.

6.4 The main areas for action and focus of each group were as follows:

Children's Centres

- Review the current model of delivery in the Children Centres
- Consider the budgetary implications to deliver services and define a fit for purpose model moving forward that is equitable and responds to demand.
- Development of a Family Hub Model in Haringey. A bid of £1.2m has been submitted to the DfE to support the development of 4 Family Hubs in Haringey.
- Ensuring there is a core offer for childhood services across the Borough (including SEND)
- Ensuring data is timely, appropriate and proportionate to contract

6.5 **Maintained Nursery Schools**

- Working in partnership with both the Early Years advisory team and Haringey Education Partnership to provide system leadership for our schools and settings
- Working in partnership by providing high quality training for the wider Early Years sector
- Supporting Nursery Schools to be a sustainable model of integrated childcare and community services

6.6 **Early Years Education**

- Narrowing the attainment gap for different groups of children including Boys, Black Caribbean, Turkish and Kurdish children and young people.
- Ensuring there is equal access to early education and childcare for all children and especially those with SEND.
- Increasing take up of the 2 year old free entitlement as an integral part of our early intervention approach.
- Increasing and broadening participation in the 3 and 4 year old free entitlement.
- Working with underrepresented groups including the Turkish, Kurdish, Somali and Jewish communities
- Retaining sustainable early education and childcare to meet changing demand across the borough in a post pandemic landscape.

6.7 **The Early Years Strategy**

6.7.1 The strategy working group highlighted the following three challenges, recognising that addressing inequalities across communities was both a key driver and a key outcome:

- Improving access to early years education and the take up of the free entitlement childcare offer support for all and for our most vulnerable children
- Improving all young children's development especially social, communication, and speech and language.

- Improving health outcomes and reducing health inequalities across all areas, including emotional health and wellbeing, healthy weight, healthy nutrition and healthy development

6.7.2 An Early Years Strategy has been drafted which sets out our work with children and families and is guided by a set of principles below which support and enable all that we do. If we hold these principles in mind, they will support us to achieve our ambitions in the ways which will strengthen our approach.

- Whole family approach involving and enabling parents at all levels with co-production embedded throughout
- Prevention, early identification of need and early intervention to reduce harm
- Whole systems and partnership working throughout the borough, to build capacity, capability, workforce development and impact across all agencies including the voluntary and community sector, Private Voluntary and Independent Nurseries, schools and the NHS
- Equitable outcomes through a focus on localities and making sure our joined up responses meet locally identified need flexibly
- Funding supports and follows every child, is setting neutral and offers equitable access to high quality early years settings for all children
- Integrated planning and resources to deliver improved sustainability and outcomes.

6.7.3 To help us ensure these principles, there are some cross-cutting enablers which we need in place to deliver our wider aspirations to improve outcomes for our youngest children:

- Long term approach to making the best use of resources across our partnership, to build sustainability and long-term impact
- Joined up approach to multi agency workforce development across partners in the statutory and voluntary sector
- Support for co-production and engagement with residents – at all levels of implementation and delivery
- The effective use of digital communication to complement face to face delivery, strong information and enhanced capacity across all priorities
- Locality working multi-agency model so that parents can access support close to home, have equality of access and reach of services within local communities
- Robust and comprehensive data on our local communities and families
- Family hub development to facilitate the infrastructure needed to embed a whole family approach.

6.7.4 The formation of the strategy was informed by Haringey strategies and other Government and health initiatives. In addition to aligning to existing Haringey strategies and policies, the strategy was informed by a range of sources including stakeholder task and finish groups and focused conversations with the early years sector, partners and parents.

6.7.5 An oversight and reference group including representatives from the Early Years Sector, partner agencies and different service areas in the Council

including the Lead Member for Early Years, Children and Families and the Director of Children's Services provided scrutiny and challenge.

6.8. **Consultation Process**

There will be a 90 day period of consultation to commence in May and end in August 2022. The consultation will involve parents, agency partners, schools and the wider early years sector as well as service areas in the Council. We will be specifically tragetting community groups through established networks and the voluntary sector. The consultation will be a combination of online surveys and face to face discussions.

7. Contribution to strategic outcomes

- Best start in life: the first few years of every child's life will give them the long-term foundations to thrive
- 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
- Every young person, whatever their background, has a pathway to success for the future
- All adults are able to live healthy and fulfilling lives, with dignity, staying active and connected in their communities
- Strong communities where people look out for and care for one another.

8. Statutory Officers comments (Director of Finance (including procurement), Head of Legal and Governance, Equalities)

8.1 **Finance**

The recommendation to commence consultation on this Early Years Strategy will not give rise to any financial implications and can be contained within existing resources.

Future decisions arising as a result of the consultation may have financial implications, therefore further work may be required to quantify the impact on the council's budgets. Any additional funding or savings proposals would need to be considered in the decision making on future Medium-Term Financial Strategies (MTFS).

It should be noted that this Early Years Strategy includes a DfE bid for £1.2m capital funding to incorporate Family Hubs into Children's Centres.

8.2 **Procurement**

The content of this report is noted.

8.3 **Legal**

The proposed Early Years Strategy would enable the Council to deliver on its statutory obligations under the Childcare Act 2006, in particular, relating to its

general duties to improve the well-being young children and reduce inequalities between young children in their area (Section 1); and specific duty to make arrangements to secure that early childhood services in their area are provided in an integrated manner which is calculated to – a) facilitate access to those services, and b) maximise the benefit of those services to parents, prospective parents and young people (Section 3).

The proposed Strategy includes a commitment to implement a Family Hub Model to build on the current Childen's Centre offer in Haringey and to implement a locality model of East, West and Central. Section 5D of the Childcare Act 2006 requires the Council to carry out consultation before making arrangements to secure that early childhood services are provided in an integrated manner in children's centre, or before any significant change is made in the services provided through a relevant children's centre. A change in the manner in which, or the location at which, services are provided is to be treated as a change in the services. In addition, if the proposed Strategy would affect or impact on the existing services provided to or received by children, parents and prospective parents in the Borough, fairness demands that they be consulted before a final decision is made on the Strategy.

For the consultation to be fair, the consultation must be undertaken at a time when proposed Strategy is still at a formative stages. The Council must give sufficient reasons for the proposal to permit of intelligent consideration and response. Those consulted should be aware of the criteria that will be applied when considering proposals and which factors will be considered decisive or of substantial importance. Adequate time must be given for consideration and response to the proposal. The feedback from the consultation must be conscientiously taken into account before a final decision is made on the Strategy.

8.4 **Equality**

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

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

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

The proposal is to consult on the new Early Years Strategy. Those most affected by this decision are babies and children under 5, including those with SEND, their parents and carers.

The strategy recognises that children under five, particularly those born just before or within the pandemic, and their parents have been disproportionately disadvantaged by the closure or reduction of services during the pandemic and that the long term impacts that are not yet understood. It also recognises that lower income families, amongst whom Haringey's Black, Asian and Minority Ethnic (BAME) families are disproportionately represented, will have been even more greatly affected.

There is a strong focus on equity and inclusion which runs through the strategy which emphasises access and outreach, and achieving more equitable outcomes.

The formal consultation with service users, stakeholders and residents on the strategy contained within this report will be used to seek feedback on the anticipated equality impacts of this strategy and results from the consultation will inform the final strategy and be published as part of the final Cabinet report.

It can be anticipated that the Early Years Strategy will have a positive impact on residents in Haringey who share the protected characteristics noted above to the extent that the strategy's objectives are achieved.

9. Use of Appendices

Appendix 1 – Early Years Strategy

10. Local Government (Access to Information) Act 1985

Not applicable.

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Haringey Early Years Strategy 2022 – 2026



Haringey LONDON

‘Best Start in Life’

Foreword

Welcome to the Haringey's Early Year's Strategy 2022-2026.

We would like to thank all of our stakeholders and partners who have been actively involved in shaping the way we develop our early years approach and look forward to seeing all that can be achieved in the coming years. Haringey's Early Years Strategy recognises that the delivery of our early years offer is not the responsibility of a single agency but is owned by all partners that work with young children and their families.

In Haringey, we are committed to working in partnership to coordinate support, care and learning for young children and their families. We are proud of the quality of our early years provision in Haringey, and we know our early years services work hard to deliver good outcomes for children.

COVID-19 has a profound impact on our youngest children. It has not only disrupted their early education but also the social contact and development that is so important from early years through to childhood and into adulthood. These impacts are not evenly distributed, but instead disproportionately affect those already experiencing disadvantage and inequality.

A dedicated Early Years Strategy will contribute towards a borough-wide t approach which prioritises early years and places a strong focus on the importance and value of ensuring high quality provision for our youngest children and their families. By having a clear emphasis on improving early years outcomes, underpinned by an Inclusive, early intervention approach, we aim to ensure we deliver our ambition for working together, with families accessing the services they need and at the time when they need them, to truly support the best start in life for their young children and wider families.

Our Early Years strategy reflects our ambition for an integrated and better co-ordinated approach across all services for young children, their families and carers. is underpinned by 'The Best Start for Life' Review. Providing comprehensive, high quality early years services, is one of the best investments any society can make for the children, their families and for our communities and we are building on our already strong networks to do this for Haringey's youngest citizens.

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Haringey Context

Haringey is a dynamic and diverse London borough with over 180 languages spoken in local schools. Our most recent residents' survey[1] identified that many young families choose to move to Haringey because of the benefits of open spaces, good schools, easy access to a number of work locations and more affordable housing.

The borough has long welcomed communities from all over the world and, in addition to long standing Black Caribbean communities, there are significant communities of Turkish and Kurdish, Somali, Latin American and Eastern European residents living in the borough too. Haringey is home to a growing community of Orthodox Jewish residents, living largely in the south east of the borough

Haringey is marked by significant inequalities and whilst deprivation levels are high, particularly in the north and east and in pockets across the borough, there are areas of great affluence and wealth. Haringey is one of the more deprived authorities in the country, ranking 49 out of 317 local authorities and the 4th most deprived borough in London. 9 of Haringey's 19 wards are within the 20% most deprived wards in England, and these are located predominantly in the east of the borough. Northumberland Park and White Hart Lane are the two most deprived wards in Haringey, with Northumberland Park being the most deprived ward in London, and White Hart Lane the 4th.

The ward with the lowest income households in Haringey is Northumberland Park and 7,317 (32%) of low income households across the borough are households with children who are in poverty. 1,368 families were identified as being in food, fuel and water poverty as of February 2021. Crouch End has 19% of low income households with children and Seven Sisters has the highest at 48%. The proportion of households in fuel poverty are highest in the east of the borough. 14.4% of Haringey households (approx. 15,400) live in fuel poverty, the 2nd highest percentage in London and substantially above the London average (11.3%). Fuel poverty is concentrated in the centre of the borough.

In 2017, 8,820 children in Haringey were living in 'all out-of-work' benefit claimant households, a figure higher than average when compared with the rest of London. Approximately one in three Haringey pupils are eligible for and claiming free school meals (30.1%). This is significantly above the London average (17.1%).

Inequalities feed into differential outcomes for Haringey residents, not only in life expectancy, but in employment, income, housing, wider health and wellbeing, including mental health and educational attainment. Whilst GCSE attainment has improved comparative to England, but is below London, there are notable attainment gaps which start to manifest from the earliest age. The % of children reaching the expected Good Level of Development (GLD) at the end of the reception year is 75%

[1] ADD LINK TO SURVEY IN THIS FOOTNOTE WHEN IT IS PUBLISHED

(2019), which is higher than the national average, yet the overall figure of 74.6% children achieving a good level of development masks a gap between boys ((68/4%) and girls (80.9% 2019) and between different communities (Black Caribbean 60.5%, Kurdish 50% and Turkish Cypriot 57.7% 2019).

Haringey residents report higher levels of life satisfaction than residents across the rest of London on average, and there are significant community assets and levels of community capacity which residents draw on all the time. Working across statutory partners and the Voluntary and Community Sector alongside local residents, is a key element of the Strategy we are presenting here.

Haringey's age profile is relatively young, and staying relatively stable, with Greater London Authority population projections showing only a small increase in the 0-4yrs population in Haringey over the next few years:

2021	2022	2023	2024	2025	2026	2027
17,845	17,907	18,007	18,095	18,176	18,250	18,318

However, the population distribution by age is not even across the borough and the wards with the youngest age profile and which are the most highly populated are in the east of the borough, with Northumberland Park and Seven Sisters wards being the most populated. These are also the wards with the highest levels of deprivation, with on average lower household incomes and lower levels of education in the home. The deprivation profile can have profound impacts on the experience of young children with child poverty 7,317 (32%) of low income households are households with children who are in poverty.

Our current early years offer is delivered across the borough through 92 Private, Independent and Voluntary Nurseries, 164 childminders, 3 Nursery Schools and 74 primary schools working alongside 9 children centres in Haringey which offer community services and support for families. Free entitlement is a mix of universal and means tested offer, with a clear differential in take up between different communities. With Haringey's Free for 2s offer, some two year olds can have a free early learning place for up to 15 hours a week. The take up of this entitlement is 54% (2020) which is below the national average. This Strategy will act as a key driver for change in this area.

The take up of the universal offer for 3 and 4 year olds is 80%



Impact of COVID

Covid has had a huge impact on all aspects of life for our children and families. Children under five, particularly those born just before or within the pandemic, and their parents have been disproportionately disadvantaged by the closure or reduction of services. Mental health and wellbeing are long term impacts that are not yet understood.

Research shows that:

- because the impact of coronavirus is likely to be worse for those with lower incomes, the disparities in the quality of the home learning environments of children from disadvantaged families and others and the subsequent outcomes are likely to increase with the current crisis (EPI 2020).
- 76% of schools reported that children who started Reception needed more support than children in previous cohorts (Bowyer-Crane et al 2021).
- A survey of disadvantaged families by Buttle UK found that only 3% of families felt there had been positives to the pandemic, including being able to spend more time together as a family (Buttle UK 2021).
- However, there has been a marked difference between children who have spent enhanced quality time at home with their parents, and those who have been at home in more difficult circumstances (Pascal et al 2020; Children's Commissioner 2020; Ipsos Mori 2020; Buttle UK 2021).

- The pandemic has been particularly difficult for parents with very young children: pregnant women assessed during the COVID-19 pandemic reported more distress and mental health problems than pregnant women assessed before the pandemic (Berthelot et al 2020).

Our response to our context provides the background to our Strategy. Our aim is to work alongside parents and communities, and in partnership across sectors, to ensure we achieve equitable outcomes despite the inequities in opportunities, experience and income faced by many households in the borough. We will continue to focus on addressing barriers and removing challenges to households achieving their potential through a joined-up response which will see more resources in some areas and for some communities to ensure that every household benefits and that no community is left behind.



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Early Years Strategy development

Transition to Parenthood and the first 1001 days from Conception to age 2 is widely recognised as a crucial period in the life course of a developing child and these first days play a significant factor in shaping both their childhood and their future life. We know, for example, that 80% of brain cell development takes place by age three.

Whilst we understand that families and partners can address missed opportunities over time, research indicates there is little substitute for a caring, supporting and nurturing environment for all young children in those early years. There is a significant body of evidence that demonstrates the importance of sensitive attuned parenting on the development of the baby's brain and in promoting secure attachment and bonding. Prevention and early intervention to increase parenting capacity and strengthen attachment relationships can positively impact on family resilience for improved long-term physical, mental and socio-economic outcomes.

Our Strategy focuses on how we can all, working actively alongside parents and carers and as partners across the borough and across sectors, help to ensure such an environment is a reality for all young children in our borough.

Our demographic context highlights the potential challenges in such a genuinely universal approach. Haringey children under 5 are as diverse as any community across the borough, facing different barriers and needing help in some areas more than others. Our strategic approach therefore is to ensure our offer aligns with and responds to need, geography and community. This means our core offer will be enhanced in some areas and will meet specific conditions. There will be an alignment at a strategic level to ensure that we achieve greater equity of outcomes for all.

From a Strategy perspective, this has always meant that this strategy cannot sit alone, separate from other strategies, and still respond to all areas of a young child's life. Working in partnership, strategically and operationally, will continue to be a key area of focus. The development of this Early Years Strategy is a genuine opportunity for focus and prioritisation on the distinct needs of young children and their families and on our aim to ensure that all children do achieve the best start in life, an outcome which will positively support them throughout their lives.

Partnership is key, and each aspect of a young child and family's life is potentially an area of focus for this Strategy. We know, for example, that access to parks and open spaces is fundamentally important for the development of play and of good health throughout life, not just childhood. Likewise, a healthy balance of work requires effective and high quality early years education and childcare to ensure that parents can effectively juggle home and work life. We also know that children with special educational needs and/or disabilities (SEND) benefit from access to early years education, care and support above al,l and that this provides respite to family carers supporting them to maintain children at home wherever possible.

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As developing the strategy has relied on the strength of our partnership, so will the delivery across the range of public, voluntary and community and private business sectors. The shifts in central government thinking and policy towards the development of family hubs link to central government policy application here in Haringey.

A wide range of Haringey strategies and other initiatives outlined below, and which have been informed by local residents, communities and partners, touch the lives of young children and so both are pertinent to this strategy and have informed the development of our priorities: (add hyperlinks)

- The Borough Plan 2019-2023
- Haringey's Early Help Strategy 2021-2023
- Haringey SEND Strategy 2022 -2025
- The Best Start for Life – The First 1001 Critical Days
- Healthy Child Programme
- Healthy Early Years London
- The Baby Friendly Initiative UNICEF
- Good Economy Recovery Plan
- Forthcoming Parks and Open Spaces Strategy

In addition to strategies and policies, this strategy was informed by a range of sources as follows:

Stakeholder task and finish groups including:

- Children Centres
- Early Education and Childcare
- Nursery Schools
- An oversight and reference group including representatives from the Early Years Sector, partner agencies and different service areas in the Council including the Lead Member for Early Years, Children and Families and the Director of Children's Services

Focused conversations with:

- Parents
- Schools
- Private, Independent and Voluntary Nurseries
- Childminders

Finally, Haringey's Borough Plan, which runs until 2023 sets out our ambitions for children and young people in the vision for people and the key outcomes we set ourselves to achieve:

- Best start in life – the first few years of every child's life will give them the long-term foundations to thrive

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- 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
- Every young person, whatever their background, has a pathway to success for the future
- All residents will be able to live free from harm

These outcomes have shaped and underpin this strategy.



‘All children will have the best start in life and a happy, healthy childhood’

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Early Years Principles

Our work with children and families is guided by a set of principles which support and enable all that we do. If we hold these principles in mind, they will support us to achieve our ambitions in the ways which will strengthen our approach:

- Whole family approach involving and enabling parents at all levels with co-production embedded throughout
- Prevention, early identification of need and early intervention to reduce harm
- Whole systems and partnership working throughout the borough, to build capacity, capability, workforce development and impact across all agencies including the voluntary and community sector, the PVI, schools and the NHS
- Equitable outcomes through a focus on localities and making sure our joined up responses meet locally identified need flexibly
- Funding supports and follows every child, is setting neutral and offers equitable access to high quality early years setting for all children
- Integrated planning and resources to deliver improved sustainability and outcomes

To help us ensure these principles, there are some cross-cutting enablers which we need in place, in order to deliver our wider aspirations to improve outcomes for young children:

1. Long term approach to making the best use of resources across our partnership, to build sustainability and long term impact
2. Joined up approach to multi agency workforce development across partners in the statutory and voluntary sector
3. Support for co-production and engagement with residents – at all levels of implementation and delivery
4. Effective and inclusive use of digital – to complement face to face delivery, strong information and enhanced capacity across all priorities
5. Locality working multi-agency model – so that parents in their neighbourhoods can access support close to home, have equality of access and reach of services within local communities
6. Robust and comprehensive data on our local communities and families
7. Family hub development to facilitate the infrastructure needed to embed a whole family approach
8. Building links to economic development as accessible childcare serves the needs of working families and providing the best start for children

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Strategic Aim 1:

To work in partnership with our parents and carers to build resilience and enjoy family life.

Strategic Aim 2:

To support parents and babies before and after birth to create the conditions where stress is reduced, positive, bonds and attachments can form, and language and communications skills develop so that children are ready for life, enjoyment and learning.

Priority One:

To provide an early years local offer to all parents and families by providing clear information, advice and guidance

Why is this important?

Being a parent is an exciting, complex and often a challenging journey in any family's life. Parents provide those first steps of learning for a child and a good start in life as they nurture, care and guide their child's development. It is key to build on the resilience, strengths and capabilities of parents and by working in partnership we enable and empower parents to be the best that they can be. It is important for parents to recognise when they need help and know where to get it. The information, advice and guidance a parent receives is vital as they balance the various demands that parenting can bring. As part of our partnership with community services and facilities including our libraries, our parents to be able to access a wealth of support and advice to support their knowledge of early education for their children's development.

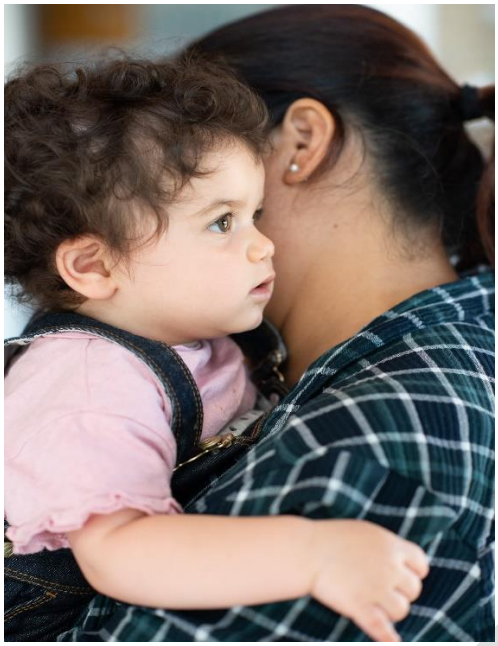
We will:

1. Develop a package of support for parents (and specifically new parents) which is clear and prioritised including adult learning, welfare support, employment, housing, early years education health and parenting

2. Review our early years digital offer, ensuring up to date and relevant information and resources are easily accessible and available.

3. Work in partnership with parents to build resilience and enjoy family life through the delivery of parenting programmes and support services

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‘If we value our children then we must cherish their parents’ Bowlby

Priority Two:

To embed and develop an integrated, multi-agency approach to support both pre- and post- birth and childhood through enhanced children’s centre partnerships and locality based 0-19 Family Hubs.

Why is this important?

A multi-agency whole family approach to support both pre- and post- birth and throughout childhood through enhanced Children’s Centre partnerships and the development of locality based 0-19 family hubs are key to our improved work with parents and the community.

By developing a Family Hub model, we aim to strengthen support to families using a life course approach by providing help with the many challenges parents face; especially those which will hamper children and young people’s social, emotional, physical development and their educational progress.

It’s important that families know where to go and get help, and that staff and volunteers are trained to respond sensitively and effectively to families’ enquiries.

Our Family Hub model will provide a single point of access to services and advice), connection with services working or co-located together and relationships that are focussed on families.

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We will:

4. Review and embed a comprehensive and consistent core offer of childhood services offer across all children centres

5. Implement a Family Hub model starting with Triangle Children, Young People and Community Centre as the pilot. building on our children centre offer providing services to support children and young people aged 0 – 19.

6. Develop a core health visiting, and midwifery offer within children's centre and Family Hub settings.

7. Establish stronger relationships with families to influence the shaping of services and our service delivery model.

Strategic Aim 3:

To narrow the gap in attainment for different groups of children ensuring there is equitable access to early education and childcare for all children across the borough



Priority Three:

To increase the take up of free entitlement to education and ensure we have flexible, affordable early years education which all communities in Haringey are supported to access.

Why is this important?

We want to ensure that there is flexible, affordable early years education which all communities in Haringey are supported to access. We will target those most in need including children in need, children with emerging special educational needs and children growing up in poverty.as well as some communities which are underrepresented. We will respond to how our communities access provision and childcare so that community needs are met supporting their child to the best start in life.

We will:

8. Develop a communications and marketing campaign to raise the awareness of the free entitlement throughout the borough.

9. Review how we can support our most vulnerable 0–5-year olds to access childcare including those who do not meet the entitlement criteria

10. Develop an outreach programme to engage with the Turkish, Kurdish Somali and Jewish communities to understand and respond to their childcare needs.

Priority Four:

Ensure the multi-agency early years workforce has consistent access to high quality workforce development and training across all early years education settings

Why is this important?

The importance of a high quality early years curriculum delivered by a skilled workforce is key to supporting our children to grow and develop in the early years and prepare them for the next stage in their education. Early years education can play a critical role in a child's life outcomes. Research shows that supporting and developing the early years workforce is central to delivering high quality provision for families. Haringey is committed to improving the skills of the workforce and establish a long-term vision for developing the sector for the new decade.

We will:

11. Continue to expand our model of setting to setting support to improve the quality of provision and skills of the early years workforce
12. To undertake a skills audit and work in partnership with the Nursery School Consortium to respond and develop a workforce development plan to provide high quality training responding to need.

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13. Work in partnership with both the Nursery School Consortium and Haringey Education Partnership to develop a programme of peer learning which provides system leadership for our schools and settings



Priority Five:

Every child should be able to have access to the high quality inclusive provision that is tailored to their needs.

Why is this important?

Research has shown that children with special education needs and disabilities (SEND) make better progress when they are in an early years setting. We want to ensure that disability and need does not reduce a parents childcare options and is not a barrier to accessing childcare that responds to children and the family's needs. A skilled workforce is pivotal to achieving our aim to provide the support and intervention that both the child and family need

Good communication and language skills combined with strong social and emotional development are key to supporting our youngest children to become lifelong learners and reach their full potential. Children who are helped to become resilient, confident and effective communicators can develop the skills to overcome challenges they will face through life. In Haringey we recognise that the levels of referrals to the Speech and Language Service are continually increasing and that services currently are unable to meet the needs of our youngest children because of the volume of demand.

We will:

14. Ensure there is sufficient funding to provide additional support for children with emerging needs or SEND that follows the child based on their need

15. With our Nursery Schools as a key partner, provide a comprehensive training programme to ensure that the early years workforce feel competent and confident in supporting young children with SEND within their settings.

16. Review and improve the speech, language and communication offer to better meet the needs for young children.



Haringey Nursery Schools

Haringey's three nursery schools (Pembury House, Rowland Hill and Woodlands Park) form the Haringey Nursery School Training Consortium (HNSTC) with the central aim of developing a progressive and outward looking role for nursery schools. In 2011 the Consortium was given Early Years Teaching Centre (EYTC) Status.

The nursery schools in Haringey have a rich and diverse history of excellent integrated early years practice and have developed a reputation for high quality accredited and non-accredited training.

Our Nursery Schools will have a a key role in delivering against priority five and supporting the wider early years workforce. Working in partnership with the Haringey Early Years team and a range of other partners we aim to progress our role in leading system improvement in the Early Years in Haringey and beyond.

Our Nursery Schools:

- provide high quality early education for led by specialist headteachers and by teachers, qualified SENCOs and early years educators
- each school has a Children Centre and provides integrated care, education, health and other services for children, so that all aspects of a child's development can be supported within the context of the family
- are in wards with some of the highest levels of deprivation in Haringey and are successful at working with the most disadvantaged and vulnerable children and their families
- give priority to vulnerable children and children with special needs and disabilities. Haringey SEND service commission specialist places in all three nursery schools

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Strategic Aim 4:

To ensure all families have a healthy pregnancy and a healthy early years, by improving health and wellbeing and reducing health inequalities for all children.



Priority Six:

To improve health and wellbeing and reduce health inequalities for all children.

Why is this important?

Our focus on health and wellbeing will ensure we address all aspects of a child's wellbeing and development, across social, emotional, mental and physical health. We recognise that no one aspect of a child's development is more important than another and we need to work across partners to ensure access for all our communities to the same health improvement and wellbeing opportunities.

Transition to Parenthood and the first 1001 days from Conception to age 2 is widely recognised as a crucial period in the life course of a developing child. We know that 80% of brain cell development takes place by age three. There is a significant body of evidence that demonstrates the importance of sensitive attuned parenting on the development of the baby's brain and in promoting secure attachment and bonding. Prevention and early intervention to increase parenting capacity and strengthen attachment relationships can positively impact on family resilience for improved long-term physical, mental and socio-economic outcomes.

We will:

17. Enhance access to parks, leisure facilities and holiday activities for under 5s and their families

18. Use a whole systems and partnership approach, to support change and improvements needed, maximising preventative activities for promoting healthy weight, physical activity and oral health among families.

19. Target resources in areas of highest risk of poor health outcomes

20. Work with health partners to develop integrated care pathways and ensure that all children receive statutory health and development reviews

21. Focus on supporting good infant and maternal mental health

22. Manage minor illnesses in the community to reduce hospital attendance and admissions



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Strategic Aim 5:

Developing partnership and joined up infrastructure to deliver equitable outcomes and make best use of resources

Priority Seven:

Working together to plan the best use of resources to deliver improved outcomes for all children and families

Why is this important?

Investment in the earliest years of a child's life will ensure that children grow up with the best possible outcomes. We will work together to ensure that funding and resources support all families and ensure that they are responsive to local need especially for those living in poverty and at risk from harm.

We will:

23. Integrate our resource planning to ensure effective use of funding to deliver shared outcomes

24. Target resources in areas and for communities at highest risk of poor health and wellbeing outcomes meaning money will move around the system and the borough

25. Work together to attract inward investment to early years provision prioritising bidding in line with this Strategy

26. Build the case for greater investment in our key strategic priorities

Priority Eight:

We will develop our partnerships to ensure that all professionals working with parents and children through their children from pregnancy to the end of the foundation stage deliver effective and consistent services of support and advice

Why is this important?

Our working partnerships will be key drivers for our success to improving outcomes for our youngest children and their families. By working together and building strong networks with community services and multi agencies we will aim to deliver consistent messages and high quality services for our families. This will enable us to have shared goals for our strategy and high expectations of deliverance for all. Our Early Years Partnership Board will provide a robust mechanism to ensure that we are on track with our aims, priorities and actions.

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We will:

27. Establish an Early Years Partnership Board across a range of partners and reflective of our borough's diversity and communities

28. Have a co-ordinated and consistent approach across services through this Strategy and Shared Strategic Action Planning

29. Provide clear communication and messaging for our families and partners through the Board, developing strong networks between us

30. Co-produce in partnership with parents and communities to develop policies and strategies to ensure ownership and consistency across the borough that:
    - Have shared outcomes and goals to support our children and their families
    - Have high expectations of each other and the services we offer
    - Provide high quality services that are open to scrutiny and challenge
    - Build trust within the communities we serve



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Governance, evaluation and continuous improvement

The Early Years Review and the associated development of an Early Years Strategy have highlighted the need for partnership governance around Early Years. By way of background, there is currently no dedicated partnership or strategic space for a focus on early years The Start Well Board in Haringey includes work from birth through childhood, and will therefore provide oversight, but it has limited time to focus on the early years per se.

It is therefore proposed that an Early Years Strategic Partnership Board be established which will report into the Start Well Board (which itself reports into the Borough Partnership Executive and Integrated Care Partnership). It will comprise partners across early years including the local authority, early years education (maintained and PVI), children's centres, NHS community and maternity services, the voluntary and community sector and be chaired by an Assistant Director from the Council. There is a known and understood crossover with early help and therefore there will be a close interface with the Early Help Strategic Partnership Board which also reports to the Start Well Board.

The Partnership Board will have a number of functions:

1. To be responsible for the implementation of the Early Years Strategy and action plan, providing robust scrutiny, challenge and oversight.
2. To ensure performance and outcome metrics are developed, reported and applied to evidence impact inform future developments
3. To offer a space for a focus on early years developments including new legislation and policy, etc.

Our Early Years Strategy sets out our ambitions to achieve our goals to provide the best possible education, care and support for our children and families in Haringey. The foundations in early childhood are key to a child's development and Haringey is committed to ensuring that these foundations are as strong and positive as possible. We want all children to have the best possible start in life, reach their greatest potential and most importantly be happy in everything they do.

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Report for: Cabinet – 8 March 2022

Title: 2021/22 Finance Update Quarter 3 (Period 9)

Report Authorised by: Jon Warlow, Chief Finance Officer & Section 151 Officer

Lead Officer: Frances Palopoli, Head of Corporate Financial Strategy & Monitoring

Ward(s) Affected: N/A

Report for Key/ Non-Key Decision Key Decision

1. Introduction

1.1 This budget report covers the position at Quarter 3 (Period 9) of the 2021/22 financial year including General Fund (GF) Revenue, Capital, Housing Revenue Account (HRA) and Dedicated Schools Grant (DSG) budgets. The report focuses on significant budget variances including those arising as a result of the forecast non-achievement of approved MTFS savings as well as the best estimates of the ongoing impact of the Covid-19 pandemic (C19) on the Council's financial plans.

1.2 The Budget/Medium Term Financial Strategy (MTFS) 2021/22-2025/26 report agreed by Full Council in March 2021 continued to assume that the Council could rely on general and specific grants from government to address the financial impact of the pandemic on 2021/22 budgets. The Budget also continued to acknowledge and respond to forecast demands and take as realistic a view of its circumstances as possible and as a consequence £8.6m (before savings) was invested primarily into Adults and Children's services.

1.3 The overall forecast General Fund variation from budget for the year as at Qtr3 stands at **£21.8m (£23.0m Qtr2)** with **£12.43m (£12.87m Qtr2)** attributable to C19 and **£9.36m** (£10.20m Qtr2) base budget pressure. Although this represents a small improvement on the Qtr2 position this has largely been achieved by the application of £3m earmarked inflationary budget provisions now assumed not to be required this year. The two care services are forecasting a further £2.6m deterioration in base budget pressure from the previous quarter as they continue to be adversely impacted by the direct and indirect consequences of the pandemic on demand as well as increased cost of placements. Identifying mitigations in these predominately statutory services will be challenging however, the Council must look to identify opportunities in other areas to seek to offset this spend as far as possible before year end.

1.4 In terms of C19, the financial impact for most priorities appears to have stabilised and the £9.1m un-ringfenced emergency C19 grant plus other specific grants and income compensation are still expected to offset the **£12.43m** in full. It must be recognised however, that there have been some considerable improvements in forecasts in some of the services which is masking increased C19 expenditure forecasts in Economy and Adults.

1.5 The financial pressure on the 2021/22 DSG budgets has also stabilised this Qtr with **£6.69m** overspend forecast (£6.38m Qtr2). The Council is currently finalising the DSG Management Plan which will be a live document that will be shared periodically with the DfE. This remains a national issue impacting many councils which the Government will need to address.

1.6 Excluding framework budgets which are held to allow the Council to respond to opportunities, the spend forecast in the 2021/22 capital programme has reduced this Qtr to 51% of budget (62% Qtr2).

2. Cabinet Member Introduction

2.1 This report provides an update on our in year financial position, as at the third quarter of the financial year. The report presents both base budget variations, and those which are exceptional, and are directly related to the pandemic.

2.2 The overall position is improved from that reported at the last quarter with a £1m favourable movement overall. There are several factors continuing to this. Pressure within our social care budgets has continued to grow over the last quarter, and in these statutory demand led services, it is challenging for the Council to be able to reduce spend in the short term. Offsetting these increased pressures in service budgets are improvements in a number of other budget areas, in and most significantly the release of corporate inflationary provisions which the Council is not now forecast to require in the current financial year.

2.3 As regards the directly related costs of the pandemic, these continue to be stable, and we continue to anticipate that they will be offset by various government funding streams. The ongoing effects of the pandemic are, however, of great concern, and we have looked to take these into account in our planning for the 2022/23 budget and MTFS. A great deal of uncertainty surrounds how the pandemic will eventually unfold and the long term this will have on the Council's finances. The Council will continue to monitor and report on this going forwards.

3. Recommendations

Cabinet is recommended:

3.1. To note the forecast base budget revenue outturn for the General Fund of **£9.37m** and that Directors are seeking actions to bring the forecast down before the end of the year. (Section 6, Tables 1a and 1b, and Appendix 1).

3.2. To note that the **£12.43m** forecast Covid pressure on the GF is expected to be offset by Government funding (Section 6 and Table 1a).

3.3. To note the net Housing Revenue Account (HRA) forecast of £0.3m overspend (Section 6 and Appendices 1 and 2).

3.4. To note the net DSG forecast of £6.69m overspend. (Section 6 and Appendix 1).

3.5. To note the forecast budget savings position in 2021/22 which indicates that £4.9m (46%) may not be achieved. (Section 6 and Appendix 3). This is incorporated in the GF budget pressures addressed in recommendations 3.1 and 3.2 above.

3.6. To approve the proposed budget adjustments and virements to the capital programme as set out in Table 2 and Appendix 6.

3.7. To note the forecast expenditure of £241.7m in 2021/22 which equates to 51% of the revised capital budget (Section 8 and Appendix 4).

3.8. To approve the revenue budget virements and receipt of grants as set out in Appendix 6.

3.9. To note the debt write-offs approved by officers in Quarter 3 2021/22 (Appendix 7) and to approve the debt write-offs greater than £50k in Appendix 7a.

3.10. To note the C19 grants schedule (Appendix 8).

3.11. To agree to delegate the authority to enter into a pensions agreement with the London Pensions Fund Authority (LPFA) in relation to historic Greater London Council/Inner London Education Authority pension liabilities, to the Director of Finance, as set out in section 9, and to note that the financial implications are in line with the Medium Term Financial Strategy assumptions.

3.12. To note the delegated decision made by the Director of Finance to enter into a 'Master Assignment Agreement' with the Secretary of State for Business, Energy and Industrial Strategy (BEIS) for the recovery of debts relating to the Covid 19 business rates grants schemes, as set out in section 10.

3.13. To approve the allocation of £1.1m from the approved capital programme contingency to the Alexandra Palace and Park Trust for urgent capital works, as set out in section 8.

3.14. To agree to defer repayment of £0.414m of loan repayments from Alexandra Palace and Park Trust in both 2021/22, and 2022/23, as set out in section 8.

3.15. To accept the CCG Grant of £1.34m in relation to the Wood Green NHS Hub project, as set out in section 8.

3.16. To approve a budget virement of £1m Strategic Community Infrastructure Levy from DEN budget to the Wood Green NHS Hub project, as set out in section 8.

3.17. To accept the GLA grant of £10m in relation to the High Road West scheme, from the Mayor's Land Fund, as set out in section 8.

4. Reason for Decision

4.1 A strong financial management framework, including oversight by Members and senior management, is an essential part of delivering the council's priorities and statutory duties. This is made more critically important than ever as a result of the on-going financial implications placed on the Council by the Covid-19 crisis.

5. Alternative Options Considered

5.1 The report of the management of the Council's financial resources is a key part of the role of the Director of Finance (Section 151 Officer) in helping members to exercise their role and no other options have therefore been considered.

6. Revenue Outturn

6.1. Covid -19 Financial Impact

6.1.1 As highlighted in Section 1 above, the Council continues to plan on the basis that government support will offset the forecast financial impact of C19 which was the case for 2020/21. However, it remains imperative that the forecast impact on agreed plans is carefully monitored throughout the year alongside receipt of government funding. Should insufficient resources be received from government, the Council will need to meet the shortfall from its own resources.

6.1.2 Table 1a below summarises the forecast C19 pressure on the GF and government funding assumed at Qtr3.

Table 1a

	P9	P6	Movement
General Fund	**2021/22**	**2021/22**	**2021/22**
	(£m)	**(£m)**	**(£m)**
Covid Pressure	12.43	12.87	(0.44)
Less: Un-ringfenced Emergency Grant received	(9.10)	(9.10)	0.00
Less: Income Loss Compensation Grant estimate	(2.50)	(2.70)	0.20
Government Funding Assumed	**0.83**	**1.07**	**(0.24)**
(b) Residual Non-Covid Pressure / (Surplus)	**9.37**	**10.17**	**(0.80)**
TOTAL Covid (a) + Non-Covid (b)	**10.19**	**11.24**	**(1.05)**

6.1.3 It should be stressed that the impact of C19 on the Council's **Collection Fund** continues, with in year collection estimated at 95.5% for Council Tax and 94% for Business Rates well below the 96.5% & 98% targets pre-pandemic. The Council received £3.6m Local Council Tax Support grant for 2021/22 which Haringey has utilised to fund increased CTRS claimant numbers (and therefore reduced Council Tax collection). The Introduction of a Local Welfare Assistance Scheme, Haringey Strategy for Tacking Debt and Haringey Ethical debt Reduction Policy are tools being used to support residents struggling financially. Government S31 grants continue to be paid to offset the on-going reliefs provided to businesses which continue to be significantly impacted by the pandemic.

6.1.4 The 2021/22 Budget and MTFS assumed lower collection rates for both of these revenue streams and bad debt provisions overall were augmented as part of the 2020/21 account closure process. The impact of lower than planned collections will manifest on GF revenue budgets in 2022/23 and 2023/24 and the most up to date forecasts have been built into the 2022/23 Budget/MTFS 2022/27.

6.2 General Fund Forecasts

6.2.1 Table 1b below sets out full year projections at priority level.

Table 1b – Revenue Budget Monitoring Forecast for Quarter 3 2021/22

Priority	Revised 2021/22 Budget	Total SAP Forecast	Base Budget Pressure / (Saving)	Covid Pressure	P9 Total Variance	P6 Total Variance	Movement P6 to P9
	£'000	£'000	£'000	£'000	£'000	£'000	£'000
Housing	17,317	18,542	71	1,153	1,224	1,215	9
People - Children's	65,889	73,954	5,025	3,040	8,065	7,039	1,027
People - Adults	87,700	96,436	6,536	2,200	8,736	6,648	2,088
Place	30,405	36,350	2,058	3,888	5,946	5,585	361
Economy	5,294	8,341	1,154	1,893	3,047	3,053	(6)
Your Council-Service	8,802	9,655	598	255	853	2,450	(1,597)
Your Council-Corporate	33,669	27,592	(6,077)	0	(6,077)	(2,950)	-3,127
General Fund Total (before funding & DSG)	**249,076**	**270,871**	**9,366**	**12,429**	**21,795**	**23,040**	**(1,245)**
External Finance	(249,076)	(249,076)	0	0	0	0	0
General Fund Total		**21,795**	**9,366**	**12,429**	**21,795**	**23,040**	**(1,245)**
DSG		6,689	6,689	0	6,689	6,380	309
HRA		308	308	0	308	937	-629
Haringey Total		**28,791**	**16,362**	**12,429**	**28,791**	**30,357**	**(1,566)**

6.2.2 The further £2.6m increase in base budget forecast pressures in the two care services over and above the £8.9m at Qtr2 is of great concern. With a sizeable structural funding gap forecast in in future years, it is critical that services remain as closely within their agreed 2021/22 budgets as possible. However, it must be recognised that much of the forecast variance is caused by the indirect impact of the pandemic. This is particularly true in the social care services which continue to see significant step up in demand since the original budgets were set; this has been coupled with increased placement and other costs. These are pressures not expected to be met by Government this year as they are consequential, rather than direct impacts of the pandemic.

6.2.4 It should also be stressed that the £9.37m forecast is already **net** of a £6.1m forecast underspend against corporate budgets, predominately interest payments and, this quarter, earmarked inflationary budget provisions no longer forecast to be required this year. Where the Council has a statutory duty to provide a service, the options to reduce costs are constrained however, directors will continue to look to mitigate the pressures where possible. The financial planning process leading to the approval of the 2022/23 Budget sought to recognise and respond to the increased demand seen across the current year and social care budgets in particular have been increased as far as possible to match this evidenced demand.

6.2.5 However, the forecast year end budget variance cannot be ignored and the Council must look to identify opportunities in other areas to seek to offset this spend as far as possible before year end. Non-care service Directors are being asked to review the plans in place in their services to reduce overspending before the year end and identify any additional measures they can take to contribute to offsetting or at least contain the corporate overspend.

6.2.6 Members should be aware however that that the authority has sufficient financial means overall to cover off the forecast overspend should it not be fully mitigated by year end.

6.2.7 A detailed analysis at directorate level is attached in Appendix 1 along with relevant commentary.

MTFS Savings Delivery

6.2.8 Officers continue to monitor delivery of all agreed MTFS savings as part of their monthly budget monitoring processes. At **Qtr3 £4.9m (46%) (Qtr2 £5.8m/55%)** of the 2021/22 savings programme is forecast to deliver and Appendix 3 provides a detailed RAG rated analysis by Priority. This is a further drop and is contributing to the deterioration in the base budget forecast. The most significant change since the previous quarter is in Adults services which is now forecasting slippage of £1.4m this year. It should be noted though those services are forecasting slippage in delivery rather than non-delivery. This has been taken into account as part of the 2022/23 Budget formulation. Services also continue to monitor deliverability of savings agreed for 2022/23 and beyond.

7 Debt and Write Offs

7.1 Appendix 7 provides a summary of the debts under £50,000 written off in Qtr3 totalling £0.667m. These have been approved by the Director of Finance under his delegated authority and all are adequately provided for.

7.2 Under Haringey's constitution debts of £50,000 or more require the approval of the Cabinet member for finance or Cabinet. This quarter there are 13 such debts being recommended for approval as set out at Appendix 7 with a total value of £1.096m. These have arisen for different reasons in previous financial periods, and all available recovery action has now been undertaken. All are fully provided for and as per appropriate accounting practice, this position needs to be recognised in the Council's accounts and the debts written off. The detail surrounding each of these debts is set out in Appendix 7a

8 Capital Expenditure Forecast at Quarter 3

8.1 In quarter three, the capital programme has been further reviewed with the aim to closely align the financial performance of the programme, with actual progress. This review incorporates the known effects of the pandemic (such as labour shortages, material shortages, lengthened lead in times, inflation etc.), and a range of other factors. Findings of the review has brought to light some discrepancies between the current 2021/22 budgets and the expected physical progress. Consequently, the relevant budgets have been further realigned / reprofiled accordingly.

8.2 In addition, the capital programme contains a number of framework budgets. These budgets, such as the Strategic Acquisitions Fund, are there to enable the Council to

respond to opportunities as they arise but still be within the budget and policy framework.

8.3 These budgets are inherently difficult to forecast and if not accounted for will distort the performance of the capital programme. The table below restates the programme taking the review and the reprofiling into account as well as adjusting for the framework budgets.

Table 2 - 2021/22 Capital Expenditure Analysis as at Quarter 3

Priority	2021/22 Revised Budget (£'000)	2021/22 QTR. 3 Budget Adjustments (£'000)	2021/22 Framework Budget (£'000)	2021/22 Revised Budget (after adjustments) (£'000)	2021/22 Qtr. 3 Forecast (£'000)	2021/22 Budget Variance (£'000)	Variance Movt. Btw. QTR. 2 & QTR. 3 (£'000)
People (Children's)	41,024	0	0	41,024	28,133	(12,891)	(4,793)
People (Adults)	14,673	2,000	0	16,673	8,680	(7,993)	(2,575)
Place	43,894	1,100	0	44,994	31,196	(13,798)	(2,422)
Economy	225,122	10,506	(174,235)	61,393	35,564	(25,829)	(2,078)
Housing (GF)	13,050	0	(12,736)	314	314	0	314
Your Council	31,118	(1,078)	0	30,041	12,071	(17,969)	(14,210)
General Fund Total	**368,881**	**12,528**	**(186,971)**	**194,438**	**115,958**	**(78,480)**	**(25,764)**
Housing (HRA)	277,033	0	0	277,033	125,764	(151,269)	(26,387)
Total	**645,914**	**12,528**	**(186,971)**	**471,471**	**241,722**	**(229,749)**	**(52,151)**

8.4 At this point in the year, the forecast is for a spend level of £242m, or 51% of the restated budget, which reflects a reduction in quarter two forecast of £52m. Please refer to appendix four for detailed explanations and reasons for the reduction in forecast.

APPCT

8.5 The Council has been notified of a range of essential and urgent health and safety works that need to be undertaken at the Alexandra Palace by the Trust. The works include repairs to the outside of the building to prevent deterioration in its condition, mechanical and electrical works to renew outdated electrical wiring and boards and works to the ice rink to further protect people watching the skating. The works are estimated to cost £1.1m. It is recommended that £1.1m is allocated to the Alexandra Palace Maintenance budget from the approved capital programme contingency.

8.6 The impact of the pandemic on the Trust's trading subsidiary, Alexandra Park Trading Limited (APTL), has been and continues to be problematic with greatly reduced revenues. Whilst matters are improving the subsidiary is not making sufficient profits for it to gift aid them up to the Trust. The annual gift aid of c£1.2m has historically been nearly half of the Trust's revenue. The Trust has reduced expenditure wherever possible but is still in difficulty. The Trust has requested that the Corporate Trustee defers the loan repayments for 2021/22 and Cabinet is recommended to do so. In addition, the Trust has indicated that it will need to defer the loan repayments for the financial year 2022/23, it is also recommended that Cabinet agree this.

8.7 APPCT has also indicated that on current projections it could require additional revenue grant for 2022/23. This will be kept under review with APPCT.

Wood Green Integrated Care Hub

8.8 The Council has been approached to support the creation of the Wood Green Integrated Hub, a much needed medical facility for the residents of Wood Green. The creation of the Hub will underpin the regeneration and growth planned for the Wood Green area. The Council has been asked to contribute £1.0m.

8.9 There is no provision within the approved capital programme for the hub, however it has been identified that a corresponding amount of strategic community infrastructure levy (SCIL) can be vired from the District Energy Network (DEN) budget as it is no longer required.

8.10 The Council has been approached by the NHS to enter into a grant agreement and a memorandum of understanding in relation to the Hub. In order to secure the funding for the Hub, the NHS has requested that the Council receive a grant of £1.34m.

High Road West (HRW)

8.11 On the 21st December 2021 the Council entered into the various grant agreements with the GLA to fund the HRW project. The grant from the GLA and the associated payments to Lendlease have been built into the General Fund capital programme for future years. However, there is a grant payment of £10m being made to the Council in March 2022, as the first part of the Mayor's Land Fund grant, and Cabinet approval is sought to accept the grant.

9. London Pensions Fund Authority (LPFA) Agreement

9.1. The Greater London Council (GLC) and Inner London Education Authority (ILEA) were abolished in 1986 and 1990 respectively. On the abolition of these organisations, whilst pension liabilities for active employees at the time were transferred to the London Boroughs, the liabilities for deferred and pensioner members remained within the London Pension Fund Authority (LPFA), and a share of pension fund investment assets was retained to pay these liabilities. In 2001 a shortfall in this share of assets began to emerge, i.e. the funds retained by the LPFA to meet these liabilities for deferred and pensioner members would not be sufficient to meet the liabilities which are actually materialising.

9.2. The LPFA is a body with the power to issue levies to London Boroughs, and Haringey currently pays around £270k per annum to them. This levy relates to the administration costs of the LPFA paying historic pensions, as well as historic asbestosis claims as a large number of individuals were awarded pensions on the basis of ill health due to historic asbestos exposure. All else being equal, this levy would begin to reduce gradually over time as a result of these historic pension liabilities are extinguished, however the shortfall discovered in 2001 remains.

9.3. Dialogue has taken place between the LFPA and The Society of London Treasurers over many years regarding this shortfall, and it has been agreed that the boroughs should seek authorisation to fund 90% of the additional liabilities. Under such an arrangement, the levy issued by the LPFA will remain at the current level, and this would pay down the shortfall in 2001 liabilities which still exists.

10. BEIS Master Assignment Agreement

10.1. The Secretary of State for Business, Energy and Industrial Strategy (BEIS) has recently published guidance to local authorities for the recovery of debts relating to the various Covid 19 business rates grants schemes. After carrying out certain activities locally, Councils are able to transfer these debts to BEIS in order that they will take forward recovery action or make decisions regarding the write off of such debts. On economic grounds, it is in the Council's best interests to enter into this agreement to avoid the Council having to continue to pursue debts, given the Council is not resourced to do so.

10.2. In order to transfer any such debts to BEIS the Council was required to sign a 'master assignment agreement' with the Secretary of State for BEIS by 31st January 2022. This agreement was entered into by the Council's Director of Finance under their delegated powers.

9 Statutory Officers Comments

Finance

9.1 This is a report of the Director of Finance and therefore financial implications have been highlighted in the body of the report. In the light of the continued adverse year end variance in revenue budget forecasts this quarter, it is expedient that the Directors focus on the actions referenced in paragraph 6.2.5.

Strategic Procurement

9.2 Strategic Procurement notes the contents of this report and will continue to work with services to enable cost reductions.

Legal

9.3 The Head of Legal & Governance has been consulted on this report and makes the following comments.

9.4 The Council is under a duty to maintain a balanced budget. Pursuant to section 28 of the Local Government Act 2003, the Council is under a statutory duty to periodically conduct a budget monitoring exercise of its expenditure and income against the budget calculations during the financial year. If the monitoring establishes that the budgetary situation has deteriorated, the Council must take such remedial action as it considers necessary to deal with any projected overspends. This could include action to reduce spending, income generation or other measures to bring budget pressures under control for the rest of the year.

9.5 The Council must act reasonably and in accordance with its statutory duties and responsibilities when taking the necessary action to reduce the overspend. The Council is facing an unprecedented situation due to the pandemic and there is a risk of the financial impact on the Council if the government does not provide the Council with sufficient funding in year to cover the Council's costs due to the pandemic. That said, Members can take comfort from the assurance on funding set out at paragraph 6.2.6 of the report.

9.6 Pursuant to the Executive 'Financial management and resources' function set out at Part Three, Section C of the Constitution, the Cabinet is responsible for approving both virements and debt write offs in excess of certain limits as set out in the Financial Regulations at Part Four, Section I, Regulations 5.31 / 5.32 & 8.15(c) respectively.

9.7 Pursuant to Part Four, Section J (Contract Procedure Rules – Rule 17.1) of the Constitution, the Cabinet is responsible for approving grants from external bodies above £500,000.

9.8 In light of the above, coupled with the Equality Act 2010 comments below, there is no legal reason why Cabinet cannot adopt the Recommendations contained in the report.

Equalities

9.9 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.

9.10 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.

9.11 This budget report covers the position at Quarter 3 (Period 9) of the 2021/22 financial year including General Fund (GF) Revenue, Capital, Housing Revenue Account (HRA) and Dedicated Schools Grant (DSG) budgets. The report focuses on significant budget variances including those arising as a result of the forecast non-achievement of approved MTFS savings as well as the best estimates of the ongoing impact of the Covid-19 pandemic (C19) on the Council's financial plans.

9.12 It also includes proposed budget virements or adjustments. The recommendations in the report are not anticipated to have a negative impact on any groups with protected characteristics. In addition to this the Councils saving programme is subject to an equality assessment, which acts to mitigate against any potential impacts for those living and working in the Borough.

9 Use of Appendices

Appendix 1 – Directorate Level Forecast
Appendix 2 – HRA Forecast
Appendix 3 – MTFS Savings Delivery
Appendix 4 – Capital Programme Level Forecast
Appendix 5 – 2021/26 Revised General Fund (GF) Capital MTFS Budget
Appendix 6 – Virements (Revenue and Capital)

Appendix 7 and 7a – Debt Write Off
Appendix 8 – Covid-19 Related Grant Support

10 Local Government (Access to Information) Act 1985

10.1 For access to the background papers or any further information, please contact Frances Palopoli – Head of Corporate Financial Strategy & Monitoring extn 3896

Directorate Level Forecast P9 **Appendix 1**

PRIORITY	Revised 2021/22 Budget	P9 Outturn Forecast	P9 Forecast to Budget Variance	P6 Forecast to Budget Variance	Movement in Variance from P6 to P9
PEOPLE : CHILDREN'S	**65,889,068**	**73,954,481**	**8,065,413**	**7,038,695**	**1,026,719**
Childrens	53,438,394	61,151,523	7,713,129	6,765,054	948,075
Children's Commissioning	3,322,390	3,624,697	302,307	302,307	0
Children's Public Health	6,004,600	6,004,600	0	0	0
Schools & Learning	3,123,684	3,173,661	49,977	-28,667	78,644
PEOPLE : ADULTS	**87,700,257**	**96,436,282**	**8,736,025**	**6,647,816**	**2,088,210**
Adults Social Care	71,723,232	80,017,665	8,294,433	6,199,136	2,095,297
Adults Commissioning	4,490,350	4,931,942	441,592	425,059	16,533
Adults Public Health	11,486,675	11,486,675	0	23,620	-23,620
PLACE	**30,404,879**	**36,350,497**	**5,945,618**	**5,584,774**	**360,845**
Environment & Neighbourhood	23,139,512	28,913,710	5,774,198	5,410,049	364,149
Culture and Libraries	5,510,367	5,677,787	167,420	170,725	-3,305
Chief Finance Officer (Alexandra Palace)	1,755,000	1,759,000	4,000	4,000	0
ECONOMY	**5,294,140**	**8,341,461**	**3,047,321**	**3,053,455**	**-6,134**
Housing Regeneration & Planning	254,950	254,950	0	0	0
Housing	110,647	110,647	0	0	0
Planning Building Standards	2,337,781	2,759,291	421,510	332,394	89,116
Property & Capital Projects	-2,074,641	551,242	2,625,883	2,721,061	-95,179
Regeneration & Economic	4,665,403	4,665,331	-72	0	-72
HOUSING	**17,317,201**	**18,541,672**	**1,224,471**	**1,215,464**	**9,007**
Housing Demand	8,111,713	8,111,711	-2	-3,000,001	2,999,999
Housing Commissioned Services	-204,880	1,020,485	1,225,365	4,215,465	-2,990,100
Commissioning	8,950,374	8,949,482	-892	0	-892
Environment & Neighbourhood	459,994	459,994	0	0	0
YOUR COUNCIL	**42,470,717**	**37,246,669**	**-5,224,048**	**-500,211**	**-4,723,837**
Chief Finance Officer	33,718,895	27,891,780	-5,827,115	-2,700,214	-3,126,901
Corporate Governance	1,788,274	1,948,274	160,000	10,000	150,000
Corporate & Customer Services	6,284,478	6,206,458	-78,020	1,738,391	-1,816,412
Chief Executive	297,450	297,450	0	0	0
Strategy & Communication	363,173	524,528	161,355	168,164	-6,809
Human Resources	461,666	917,338	455,672	431,911	23,761
IT Digital Services	753	-239,294	-240,047	-279,697	39,650
Transformation & Resources	416,110	560,184	144,074	144,074	0
Strategic Procurement	-860,081	-860,048	33	-12,840	12,873
PRIORITY TOTAL	**249,076,262**	**270,871,062**	**21,794,800**	**23,039,992**	**-1,245,191**

Further detail on the drivers of the Priority variances follow:-

PEOPLE: CHILDREN'S **Over budget £8.07m (Q2 £7.04m)**

At Q3, Children and Young People Services reporting a pressure of £8m, an increase of £1.02m from the Q2 position. This change is mainly a result of an increase in the number of Social Care placements in the period.

A large proportion (£3.14m) of the budget pressure relates to a COVID-19 pressures in the services. This pressure has been driven by a significant increase in social care activity with additional numbers and unit cost increases for placement costs and SEND transport. In addition, there is anticipated loss of income across a few services such as Pendarren and Children's Centres.

Safeguarding and Social Care is reporting a pressure of £6.1m. This pressure is largely increasing complexity and cost of placements and an increase in staffing and legal pressures linked to child protection cases in the service.

Early Help and Prevention service is reporting a pressure of £1.8m which is a combination of SEN transport pressures and shortfalls in Nursery and Children centres' income.

PEOPLE: ADULTS & PUBLIC HEALTH **Over budget £8.736m (Q2 £6.648m)**

Adults and Public Health is forecast to spend £96.436m against a budget of £87.700m which is an adverse variance of £8.736m at Q3. This represents an increase in pressure of £2.088m from the £6.648m variance at Q2.

Adult Social Care, the Q3 adverse variance is £8.294m which is comprised of £2.200m COVID-19 related pressure, £2.300m base budget pressure, £3.650m savings and mitigations slippage, and £1.015m slipped savings carried forward from 20/21. Non-recurring grant funding of circa £1m is offsetting some of the pressures within the service. Pressure has arisen due to continued increased activity especially through short-term channels and complexity of care package costs due to legacy COVID-19 pressures. There has been significant slippage in demand mitigation projects and current demand has not been reduced in line with expectations because original modelling assumptions have been challenged by COVID-19 and difficulty in separating additional COVID-19 demand and base budget demand.

There has been a movement of £2.095m since Q2 in projected expenditure which is mainly attributable to £1.264m care purchasing due to a greater proportion of clients transferring from short-term to long-term care as well as an influx of high-cost and transition clients. Furthermore, due to delays caused by COVID-19 there is £1.072m slippage in savings and mitigations.

Adults Commissioning overall variance at Q3 is £0.442m which has not experienced material movement since Q2 (£0.425m). Pressure within the service is comprised of £0.215m COVID-19 related staffing pressure and £0.197m additional brokerage expenditure incurred to deliver client contribution income.

Adults Public Health is projected to break even with additional COVID-19 related expenditure being met by specific government grants.

It should be noted that there is an additional risk of a further increase in demand due to COVID-19 for packages of care that we are unable to quantify at this point in time: pressures arising through additional clients, care complexity, increased hours and carer breakdown. Dealing with COVID-19 continues to create unforeseen pressures on the service which ASC and health partners are dealing with. The impact and pressure are likely to change over the coming months as we begin to understand long-term and legacy implications of COVID-19. This poses additional risks to the budget position for 2021/22 and beyond especially if emergency funding measures were to cease.

PLACE **Over budget £5.946m (Q2 £5.585m)**

Place Priority is forecasting an over spend of £5.946m for Qtr3; a worsened position on Q2 of £0.361m. This is due to a worsened position in base budget pressure issues of £0.919m, and an improvement of pressures from COVID of £0.558m.

Parking & Highways is showing a worsened position of £0.279m at Q3. This is mainly due to increased costs in Highways reactive maintenance due to high level of defects being recorded and a correction to a mis posting to the parking budget.

Operational Facilities Management is showing a worsened position of £0.123m at Q3. This is due to further full year additional COVID cleaning and security costs being accounted for in this budget area rather than in other service budgets; plus, cross-cutting savings in the mail room not being achieved.

These adverse movements are partly off-set by improvements in other areas from increases in external income, and reductions in staffing and other costs.

ECONOMY **Over budget £3.047m (Q2 £3.054m)**

Economy Priority are reporting an adverse projected variance of £3.047m against the budget at Qtr3, in line with the Qtr2 forecast.

The main pressure remains Covid-19, which continues to significantly impact key income streams in Commercial Property (£1.316m) and Planning income (£0.395m). It is also creating overspends in Hard FM Services as a result of costs rising in Health and safety works (£0.138m) and other Covid pressures of (£0.065m).

The projected base budget adverse variance at Qtr3 is largely due to reduced capitalisation of costs in the Strategic Property unit of (£0.496m) and recovery of backdated rent payable on headlease renewals of (£0.400m). Emergency Planning continue to report a pressure of (£0.111m). It should be noted that this area is being closely monitored and any mitigations will be reported in the next Quarter.
The service is conducting ongoing reviews of these areas with the aim of reducing the impact of these pressures before year end.

HOUSING (General Fund) **Over budget £1.224m (Q2 £1.215m)**

Housing General fund reports a projected adverse variance of £1.224m the majority of which is driven by C19.
However, within the Temporary Accommodation budget area, the rent collection rate has improved slightly but is still lower than the budgeted performance of 97.5%.
This is being closely monitored with an aim to improve the position by the end of financial year.

HOUSING (Housing Revenue Account - HRA) Over budget £0.309m (Q2 £0.936m)

The Housing Revenue Account reports a projected adverse variance of £308k. This represents an improvement of £629k on the position reported in quarter 2.
This movement in variance is largely driven by £400k lower than anticipated actual Landlords Insurance premium (leasehold & tenanted). There is also a recent favourable £222k revision of the Grounds Maintenance end of year forecast to match the agreed SLA charges.

Table 3 – HRA Budget Forecast (Quarter 3)
2021/22 - Q3 vs Q2

HRA BUDGET 2021/22	2021/22 Revised Budget	HRA Projected Variance - directly related to Covid19	HRA Projected Variance - inherent base budget variance	Q3 2021/22 Forecast Variance	Q2 2021/22 Forecast Variance	Forecast Variance movement Q3v Q2
	£000's	£000's	£000's	£000's	£000's	£000's
UE0721 Managed Services Income TOTAL	(106,809)	0	762	762	513	249
UE0722 Managed Services Expenditure TOTAL	13,204	0	36	36	424	(388)
UE0731 Retained Services Expenditure TOTAL	84,821	0	-490	(490)		(490)
Surplus HRA Services (within Retained)	**8,784**	**0**	**0**	**0**	**0**	**0**
Balance of HRA Account	**0**	**0**	**308**	**308**	**937**	**(629)**

Your Council - Service Over budget £0.853m (Q2 £2.45m)

The Your Council Services projected overspend has decreased by £1.6m from Q2 to £0.853m. This favourable movement is driven by a £1.00m reduction in projected Covid pressures to £0.26m, due to an increase in projected CT and NNDR court cost income to take account of higher levels of activity following the reopening of the courts (£0.85m), and the receipt of Government Covid grant to assist with the costs of administering the business grants (£0.127m) scheme. Refunds from a Government department of £0.5m and balance sheet cleansing expected to deliver benefits of £0.5m have improved base pressures to £0.598m at Q3, an improvement of £0.6m compared to Q2.

The key base budget variances and causes are detailed below:

- Human Resources (£0.4m overspend) - an overspend on the recruitment insourcing project and higher than expected recruitment activity with Hays between April and July 2021
- Finance (£0.3m overspend) – a continued requirement for agency staff to fill key posts in the establishment
- Corporate and Customer Services (0.2m overspend) – the need to delay the planned release of staff within (a) Customer Services as a result of delays in implementation of

the new parking system and b) Revenues and Benefits due to current workload pressures

- Corporate Governance (£0.2m overspend) - a pressure in Legal Services due to a projected shortfall in commercial income and significantly higher agency rates.
- Digital Services (£0.2m underspend) – planned contract savings
- The balance of the overspend (£0.2m) is made up of minor staffing costs pressures across the remaining services.

Your Council - Corporate **Under budget £-6.1m (Q2 £-2.9m)**

The forecast underspend has increased by £3m this quarter due to is due to the application of £3m earmarked inflationary provision budgets for pay and non pay inflation, which are now assumed not to be required this year. The £2.9m underspend forecast at Qtr2 is still sound and is due predominately to capital financing borrowing costs assumed to be below budgeted figures as a result in slippage in the planned capital programme.

Dedicated Schools Grant (DSG) **Over budget £6.69m (Q2 £6.38m)**

The DSG overall deficit position compared with Q2 has increased by £301k from £6.38m to £6.69m. The movement between Q2 and Q3 is as a result of a pupil number adjustment.

Table 4 – DSG Position Quarter 3

P9

Blocks	Budget £'000	Forecast £'000	Variance £'000
Central Block	2,912	2,912	0
Early Years Block	21,036	21,036	0
High Needs Block	42,865	50,095	7,230
Schools Block	136,263	136,263	0
E40000	-203,076	-203,617	-541
Total	**0**	**6,689**	**6,689**

The main driver for the pressure in the High Needs block remains the increasing number of Education, Health and Care Plans (EHCP) in recent years. In addition, approximately 25% of our children who are looked after have an EHCP. Where we have children who are looked after with an EHCP and who require an out of borough placements e.g. specialist residential, the social and financial cost is higher than in borough.

The DSG reserve is ringfenced and outside the council's general fund reserves. The cumulative DSG deficit is detailed in the table below.

DSG cumulative deficit at Quarter 3

Blocks	Opening DSG at 01/04/21	Schools Forum agreed transfer between blocks	Qtr3 Forecast Outturn Variance	Drawdown Request	Qtr3 Forecast Closing Balance
	£m	**£m**	**£m**	**£m**	**£m**
Schools Block	0.00	0.00	0.00	0.00	0.00
Central Block	(0.08)	0.00	0.00	0.00	(0.08)
High Needs Block	16.87	0.00	6.69	0.00	23.56
Early Years Block	0.11	0.00		0.00	0.11
Total	**16.90**	**0.00**	**6.69**	**0.00**	**23.59**

The Council is producing a DSG Management Plan which will be coproduced with various stakeholders and shared with the DFE and which will detail the various actions the Council is taking to manage the level of DSG overspend. The plan will be a live document which will continue to be shared periodically with the DFE. Whilst Council actions may mitigate the level of overspend increasing, it is not anticipated that the Council will be able to ameliorate this.

HRA BUDGET 2021/22	2021/22 Revised Budget	Q3 2021/22 Forecast	Q3 2021/22 Forecast Variance	Q2 2021/22 Forecast Variance	Forecast Variance Movement Q3 v Q2
	£000's	£000's	£000's	£000's	£000's
Service Charge Income - Hostels	-319,700	**-236,821**	82,879	82,879	0
Rent - Hostels	-1,943,300	**-1,405,869**	537,431	537,431	0
Rent - Dwellings	-82,030,000	**-82,089,752**	-59,752	73,299	-133,051
Rent - Garages	-861,000	**-783,306**	77,694	61,868	15,826
Rent - Commercial	-756,300	**-756,300**	0	0	0
CBS - Lease Rental Income	-1,984,000	**-1,984,000**	0	0	0
Income - Heating	-617,000	**-618,715**	-1,715	-20,397	18,682
Income - Light and Power	-1,016,000	**-1,015,224**	776	-32,812	33,588
Service Charge Income - Leasehold	-7,562,000	**-7,562,000**	0	0	0
ServChgInc SuppHousg	-1,495,000	**-1,518,556**	-23,556	-71,396	47,840
Service Charge Income - Concierge	-1,741,000	**-1,600,208**	140,792	87,484	53,308
Grounds Maintenance	-2,201,000	**-2,208,693**	-7,693	-82,486	74,793
Caretaking	-1,943,000	**-1,931,577**	11,423	-50,986	62,409
Street Sweeping	-2,338,000	**-2,334,085**	3,915	-71,913	75,828
Water Rates Receivable	-1,200	**-1,200**	0	0	0
Managed Services Income	**-106,808,500**	**-106,046,306**	**762,194**	**512,970**	**249,224**
Supported Housing Central	290,600	**205,448**	-85,152	-85,152	0
Housing Management WG	23,500	**23,500**	0	0	0
Housing Management NT	28,300	**28,300**	0	0	0
Housing Management Hornsey	0	**0**	0	0	0
TA Hostels	252,300	**427,071**	174,771	174,771	0
Housing Management ST	9,500	**9,500**	0	0	0
Housing Management BWF	11,600	**11,600**	0	0	0
Rent Accounts	0	**0**	0	0	0
Accountancy	0	**0**	0	0	0
Under Occupation	170,600	**170,600**	0	0	0
Repairs - Central Recharges	2,300	**2,300**	0	0	0
Responsive Repairs - Hostels	387,300	**610,921**	223,621	223,621	0
Water Rates Payable	31,000	**31,000**	0	0	0
HousMgmntRechg Cent	110,000	**110,000**	0	0	0
Other RentCollection	138,400	**138,400**	0	0	0
Management Special - Nth Tott	0	**0**	0	0	0
HousMgmntRechg Energ	1,128,100	**1,128,100**	0	0	0
Special Services Cleaning	3,189,300	**3,300,000**	110,700	110,700	0
Special Services Ground Maint	2,075,300	**1,853,707**	-221,593	0	-221,593
HRA Pest Control	296,800	**296,800**	0	0	0
Estate Controlled Parking	145,300	**145,300**	0	0	0
Supporting People Payments	1,861,000	**1,332,528**	-528,472	0	-528,472
Commercial Property - Expenditure	0	**0**	0	0	0
Bad Debt Provision - Dwellings	2,535,000	**2,535,000**	0	0	0
Bad Debt Provision - Leaseholders	91,000	**91,000**	0	0	0
Bad Debt Provisions - Hostels	68,000	**68,000**	0	0	0
HRA- Council Tax	358,800	**721,000**	362,200	0	362,200
Managed Services Expenditure	**13,204,000**	**13,240,075**	**36,075**	**423,940**	**-387,865**
Housing Delivery Team	0	**0**	0	0	0
Anti Social Behaviour Service	610,800	**610,800**	0	0	0
Interest Receivable	-303,600	**303,600-**	0	0	0
Corporate democratic Core	600,900	**510,800**	-90,100	0	-90,100
Leasehold Payments	-142,200	**142,200-**	0	0	0
Landlords Insurance - Tenanted	326,000	**354,133**	28,133	0	28,133
Landlords - NNDR	138,000	**138,000**	0	0	0
Landlords Insurance - Leasehold	1,939,100	**1,510,690**	-428,410	0	-428,410
HfH-Insourcing to LBH	0		0		
Capital Financing Costs	16,242,000	**16,242,000**	0	0	0
Depreciation - Dwellings	20,197,000	**20,197,000**	0	0	0
ALMO HRA Management Fee	39,271,300	**39,271,300**	0	0	0
Community Benefit Society (CBS)	0		0	0	0
Housing Revenue Account	8,784,000	**8,784,000**	0	0	0
GF to HRA Recharges	3,264,700	**3,264,700**	0	0	0
Estate Renewal	1,370,000	**1,370,000**	0	0	0
HIERS/ Regeneration Team	1,306,500	**1,306,500**	0	0	0
Retained Services Expenditure	**93,604,500**	**93,114,123**	**-490,377**	**0**	**-490,377**
Balance of HRA Account	**0**	**307,892**	**307,892**	**936,910**	**-629,018**

Appendix 3a provides progress on savings 2021-22 delivery on a more detailed level.

MTFS Savings Ref	Saving proposal	2021/22 £'000s	2021/22 Saving achieved YTD £'000s	2021/22 Projected Full Year Savings £'000s	2021/22 Savings (surplus)/ shortfall £'000s	RAG Status (Delivery of 2020/21 Saving)	Comment on Delivery RAG Status
People - Children							
PC2	Reduce operational costs	(250)		(250)	0	**Green**	
20/25-PE03	Invest to Save - Edge of Care	(241)		(18)	(223)	**Green**	
20/25-PE04	Invest to Save proposal - In-House Fostering	11		11	0	**Green**	
20/25-PE05	Invest to Save - SEND Transport	(216)		(216)	0	**Green**	
20/25-PE06	Invest to Save - Pause Project	(1)		4	(5)	**Green**	
20/25-PE08	Invest to Save - Foster Carer Room Extension	0		(55)	55	**Green**	
20/25-PE09	0-19 year old public health commissioned services - a new integrated commissioned service delivery model	125		125	0	**Green**	
20/25-PE12	Reduce operational costs in Schools and Learning and Commissioning	25		25	0	**Green**	
CH102	Maya Angelou Assessment and Contact Centre Traded Service	82		10	72	**Amber**	Delayed implementation/slow uptake will result in target saving not being fully achieved in current year. Work ongoing to build up to full delivery next year
CH103	Delivering residential mother and baby assessments	239			239	**Amber**	Initial delivery method as described in Business Case proved to be not viable as PV sector partner no longer able to engage on those terms. Other options are currently being considered. The level of potential saving in this is still to be quantified. Shortfall mitigated by further cost avoidance activity by the Family Centre
Total: People (Childrens)		**(226)**	**0**	**(364)**	**138**		

MTFS Savings Ref	Saving proposal	Description	2021/22 Target £'000s	2021/22 Saving achieved YTD £'000s	2021/22 Projected Full Year Savings £'000s	2021/22 Savings (surplus)/ shortfall £'000s	RAG Status (Delivery of 2021/22 Saving)	Comment on Delivery RAG Status
People - Adults								
B2.7	Haringey Learning Disability Partnership	The Haringey Learning Disability Partnership, working jointly with Children's Services and with key partners such as the Clinical Commissioning Group and the London Borough of Islington, will implement a coherent strategy that aims to bring Haringey's demand and spending on adults with learning disabilities in line with our statistical neighbours and limit growth in spending in line with population growth.	1,430	830	930	500	**Amber**	High risk of only delivering partial savings due to resources being diverted away from savings programmes in emergency period.
B2.8	Mental Health	Working with our delivery partner, Barnet, Enfield & Haringey Mental Health Trust, the Clinical Commissioning Group and our communities to strengthen the prevention and 'enablement' pathways for mental health and to ensure the support we provide minimises the long-run dependency of adults with mental health issues. For those whose needs require a social care intervention, we will develop the market and look at new commissioning arrangements to improve value for money as well as promoting choice and control for the service user.	490	359	490	0	**Amber**	High risk of only delivering partial savings due to resources being diverted away from savings programmes in emergency period.
B2.9	Physical Support	Working with the CCG, acute providers and primary care to extend independence, choice and control to those with physical support needs and further strengthen the pathways that prevent, reduce and delay the need for social care.	1,070	1,007	1,070	0	**Green**	High risk of only delivering partial savings due to resources being diverted away from savings programmes in emergency period.
PA6	Transfer of High Cost Day Opps	Lease three ex-day centre premises to a local provider to support 15-20 service users at reduced cost, and closer to their existing support networks.	15	0	0	15	**Amber**	High risk of only delivering partial savings due to resources being diverted away from savings programmes in emergency period.
PA9	Further savings to be delivered by Adults Services	Further action by service to reduce cost of adult social care over the next 5 years *(re-profiled existing savings)*	180	0	0	180	**Amber**	Ongoing challenges with demand and staffing issues does provide an element of risk to achieving full target

20/25 PE01	Public Health Lifestyles	Look for alternative delivery options for lifestyles services (this includes; NHS Health Checks, smoking cessation, weight management and exercise programmes for the inactive), from April 2021 onwards. This proposal suggests alternative ways of delivering these services including: Reducing the capacity of services offered (but keeping services targeted at those who need them most), seeking partial funding from NHS partners, using an alternative delivery partner, joining up with other boroughs to commission the service for economies of scale.	60		60	0	**Green**	On course to achieve the savings of £60k from Life Expectancy
AS101	Fast Track Financial Assessments	Further to reviewing comparative statistics for income collection with our nearest neighbours, some areas of income collection were reviewed with the view to maximise council income collection. Existing income collection initiatives have been expanded upon where this has proved successful. this includes charging for managed accounts, fast tracking financial assessments, reviewing clients potentially eligible for charging that had not previously been assessed.	1,050	257	400	650	**Amber**	Backlog in assessments due to delays and challenges with recruitment due to pandemic.
AS102	Client Contributions	The income opportunities presented here are working with existing policies and approvals. This savings bid is noting the increased stretch for inclusion in the MTFS for 2020/21.	487	0	487	0	**Amber**	Backlog in assessments due to delays and challenges with recruitment due to pandemic.
	Adults Delayed Savings - C19		(1,621)		(1,621)	0		
Total: People (Adults)			**3,161**	**2,453**	**1,816**	**1,345**	**0**	**0**

MTFS Savings Ref	Saving proposal	2021/22 £'000s	2021/22 Saving achieved YTD £'000s	2021/22 Projected Full Year Savings £'000s	2021/22 Savings (surplus)/ shortfall £'000s	RAG Status (Delivery of 2020/21 Saving)	Comment on Delivery RAG Status
Place							
PL9	Leisure centre concessions	50			50	**Red**	Contract with Fusion is still in COVID recovery phase, it has not been possible to negotiate these savings due to fundamental shift in utilisation of the centres.
PL13	Parking Transformation Programme to deliver significant improvements to this service over the coming three years. Includes a CPZ rollout programme taking the borough to 100% coverage, and extending parking permit charging models to tackle emissions from Diesel vehicles	500	0	125	375	**Amber**	The CPZ programme was delayed and interrupted due to covid. Although schemes were carried forward to this year the overall timelines have been impacted as scheme by scheme is introduced. Additional delays due to Purdah and the pending elections next year. Consultations and developments have been delayed there is a view that parking decisions may impact on voting decisions.
20/25-PL03	CCTV enforcement of weight limits and emissions through ANPR/DVLA check. Use of new technology cameras to record vehicle reg plates and immediately look up DVLA database to establish vehicle weight and emissions. Will require significant investment in infrastructure and back office arrangements.	280	0	140	140	**Amber**	Capital investment £200k was approved for 2021-22. Procurement of camera's commenced, locations to be identified and implementation dates confirmed. The further £300k savings next year is subject to review dependant on contravention levels and compliance. Camera's due to be installed end of next month

20/25-PL04	Increase permit charges for highest emitting 'petrol' vehicles. A flat fee increase in Permit charge for the most polluting petrol emission band(s).	25	0	25	0	**Green**	on target
20/25-PL06	Contact Centre Efficiencies	50	0		50	Red	MTFS savings initiative on hold until further notice pending micro-website and associated channel-shift opportunities
20/25-PL07	Mechanisation of High Street Cleansing	150	0		150	Red	In-year, one-off budget pressure created by postponing the £150k yr1 savings to yr2, 2022/23
20/25-PL09	Hybrid Mail proposal	77	0	0	77	**Amber**	Savings should not be expected to be made just out OFM Budget - Savings should have been made across all service budgets that use the Post room facilities. Whilst E&N budget does not reflet the savings achievement because full costs were not recharged out, originating Services had reduced spend, as such there were savings in finance year 20/21 due to Covid, reduction of post being sent out with staff not being in office. Service review been discussed with procurement and can use DMS to do review. Will be started by end of March 22. Will work with service users and other groups (digital together) to understand future requirements and options available for new ways of working. E&N to be trial service.
20/25-PL11	New Lease Income v2	20	20	20	0	**Green**	Achieved

20/25-PL14	Parking Transformation Programme. Various workstreams - contactless £376, diesel & 2nd subsequent vehicle £300k and escalated essential permits, suspensions, carparks £164k MHCLG escalated 2021-22	840	0	364	476	Red	This saving is part of the PTP £2.5m that was made up of various workstreams. Not all elements were validated when the savings were originally taken and subsequently it is apparent that certain elements are unlikely to deliver savings target originally estimated. This is mainly as an effect of the delay in the virtual system Go-Live dates for the 3 phases. Last year budget savings of £1.360m was applied, however saving at this level were not achieved. The Service is reviewing the PTP £2.5m programme for more accurate achievable savings calculations. We are undertaking an exercise to review the factors that influence how and when the surcharge is applied. Permit module went live August. Review data to ascertain trends.
PL20/9	Full Cost recovery of services	130	0	20	110	Red	£130k cost recovery is predicated on gaining contributions from Spurs for all event cleansing and/or making reductions in Haringey's operational resources. Before new stadium, LBH paid ~£65k for Spurs event cleansing but received no contribution. £130k is the current whole year estimate of cost to clean for new stadium. £20k is the current financial contribution offered by Spurs. Negotiations with Spurs are ongoing.
PL20/18	Crematorium Lease and Parks Property	20	20	20	0	**Green**	Achieved
PL20/20	PL12 (Stage 2) Fuel Savings from Electric Vehicles	0	0		0		
PL20/21	Review of Events team	45	45	45	0	**Green**	Achieved

PL20/22	Visitors Vouchers Pricing Structure change	198	0	99	99	Red	Delay to the increase of visitors vouchers pricing levels. Virtual Permit Go-live in August has indicated a potential change in customer behaviour. We believe that the introduction of the electronic VP will help to some degree to address the abuse of the VP scheme, where those without entitlements where given access to the scheme. This may well drop the volume of sales. Customers purchased higher volumes (bulk buying) in the paper system, however, electronic VP customers are less likely bulk buying because of the nature of the electronic system - purchase as and when required. Customers may also be using up their residual vouchers valid up to DEC 2023 before purchasing virtual vouchers. We are reviewing data to ascertain impact and trends.
PL20/31	Concessionary Fares	1,200	0	1,200	(465)	**Green**	Achieved estimated surplus of £465k - reduced usage - to discuss impact of covid
PL20/32	Diesel surcharge - Pay for Parking	(10)	0	(10)	0		
PL20/35	Night Time Enforcement	(5)	0	(5)	0		
PL20/39	Management and Support structure review	160	160	160	0	**Green**	Achieved
PL20/3	Management of ASB Enforcement & Remodel of ASB & Waste Enforcement and Waste Services	78	78	78	0	**Green**	Achieved

PL20/25	Pay for Parking - Introduce a minimum 30 minute purchasable sessions, (currently 15 minutes)	250		125	125	**Amber**	This proposal is no longer aligned to Parking/Transport policy. Alternative options have been considered. extract of Decision Making Report - July 2021 Paid parking – purchase in 15-minute blocks **4.29 -** Paid parking, via the RingGo pay by phone / pay by app facility, is currently purchased in 15-minute blocks of time. **4.40 -** This report notes that these 15-minute blocks are an existing arrangement which will be formalised within the traffic management orders at the same time as other statutory processes arising from this report.
PL20/27	Back office services efficiencies.	100	0	0	100	Red	Dependant upon Customer services demand reducing post implementation.
PL20/28	Introduce Sunday charges - Car Park Pricing Structure	27	0	14	14	**Amber**	subject to outcome of statutory consultation and cabinet approval - delays due purdah and political consideration
PL20/29	Introduce Sunday charges - Pay for Parking Pricing Structure	63	0	32	32	**Amber**	subject to outcome of statutory consultation and cabinet approval - delays due purdah and political consideration
PL20/30	Targeted recovery of PCNs issued to persistent evaders. Dedicated resources introduced as part of new operational model and PMIS	80	0	80	0	**Green**	On Target - Parking services recruitment to commence end of May. Risk due to Introduction of Breathable policy that may influence Enforcement Agents collection rates.

20/25-YC09	Maximising income from filming and venue management. This proposal is in two parts. The first is to make Haringey more attractive to film companies by identifying vacant buildings for meanwhile use as production bases, and by making parking easier in order to generate income. The second is to consider employing staff, as an invest to save bid, to market the council's venues for events (currently uncosted).	6	0	6	0	**Green**	On Target
YC104	Highway Searches	24		6	18	**Red**	New income stream dependent on external demand and market conditions. Initial estimates may have been slightly over-optimistic
Total: PARKING		**4,358**	**323**	**2,543**	**1,350**		

MTFS Savings Ref	Cabinet Decision Date	Saving proposal	Description	2021/22 £'000s	2021/22 Saving achieved YTD £'000s	2021/22 Projected Full Year Savings £'000s	2021/22 Savings (surplus)/ shortfall £'000s	RAG Status (Delivery of 2020/21 Saving)	Comment on Delivery RAG Status
Housing									
HO1	12-Feb-19	Temporary accommodation reduction plan	Reduce TA costs, as detailed in the TA Reduction Plan. Proposals include initiatives to prevent homelessness, improve economic position of those in TA, and help support those in TA to move on. Revenue costs covered by the Flexible Homelessness Support Grant. Plan also includes proposals to increase supply of low cost TA through new purchase, repair and management joint venture partnership, and capital investment in new Community Benefit Society. Please note that due to the additional costs incurred due to unforeseen works at BWF, it may not be possible to meet the projected savings.	573	0	0	573	**Amber**	saving has already been taken from the budget, but due to the reasons described on the previous tab there is overspend. If this saving could be reversed the overspend would be significantly reduced.
20/25-HO01	11-Feb-20	Transferring PSLs to HfH	Private Sector Leasing properties are leased by the Council from private landlords for between one and five years with a guaranteed rent for the term of the lease. Leases are mainly based on 90% of the 2011 LHA plus a £40 a week management fee (the latter being a transfer from FHSG). The CBS has been established to lease properties purchased by the Council to use them as TA or to discharge homelessness. Unlike the Council, the CBS can charge the current (2019) Local Housing Allowance (LHA) for the area the property is located in. Therefore moving these leases could mean total additonal rental income of £1.19m if all leases were transferred. This would require, in each case, the landlords agreement to do so and additonal incentives may be required. A reduction in savings of 25% has thus been included to account for this and additonal costs	272	0	0	272	**Amber**	PSL Project has taken longer to establish than originally anticipated. Only really kicked off in March 2021 after a pause on the project related to the announcement to explore bringin HfH in-house .
HO101	01-Mar-21	Housing Team Salaries - increase HRA contribution		274			274	**Green**	saving has already been taken from the budget
HO102	01-Mar-21	HfH taking over the lease of PSL properties on their expiry		209			209	**Amber**	PSL Project has taken longer to establish than originally anticipated. Only really kicked off in March 2021 after a pause on the project related to the announcement to explore bringin HfH in-house .
Total: Housing				**1,328**	**0**	**0**	**1,328**		

MTFS Savings Ref	Saving proposal	Description	2021/22 £'000s	2021/22 Saving achieved YTD £'000s	2021/22 Projected Full Year Savings £'000s	2021/22 Savings (surplus)/ shortfall £'000s	RAG Status (Delivery of 2020/21 Saving)	Comment on Delivery RAG Status
Economy								
20/25-EC08	Strategic Property Unit – New Income Outdoor Media	This proposal comprises an opportunity to achieve new income potential by securing rental payments from outdoor media companies. This includes digital billboards and an innovative building wrap with a digital display for advertising purposes and council messages.	(100)			(100)		
PL8	Soft FM Efficiency	Re-commissioning of soft FM services and services delivered through Amey contract (e.g. efficiencies in postage & franking, front of house, security).	(25)			(25)		
20/25-PL08	FM Transformation	Terminating the Amey contract for FM Services and bringing Soft FM back in-house, and transferring Hard FM to Homes for Haringey. Approximately 100 staff will be in scope for a TUPE transfer. The proposed saving will be achieved through improved efficiency and returning Amey overhead and profit to the council. The transformation will include purchase of a new Property IT system, and service improvements particularly relating to building repairs and maintenance.	(150)			(150)		
EC101	Additional Recharge to Housing Services		300			300	Green	On target to be delivered
EC102	Additional Planning income from introducing new charges		200			200	Amber	On target for delivery however full delivery is being closely monitored. Although houseolder income is up the bigger applications are slow coming through
EC103	Reduction in Energy Consumption on corporate buildings		50			50	Amber	Delivery for this is being closely monitored to ensure we achieve it, as it is not known which buildings will genenrate this saving
Total: Economy			**275**	**0**	**0**	**275**		

MTFS Savings Ref	Saving proposal	Description	2021/22 £'000s	2021/22 Saving achieved YTD £'000s	2021/22 Projected Full Year Savings £'000s	2021/22 Savings (surplus)/ shortfall £'000s	RAG Status (Delivery of 2020/21 Saving)	Comment on Delivery RAG Status
Your Council (incl Council-Wide)								
A6.2	Audit and Risk Management	Reduction in the value of the externally procured internal audit contract; potentially changing the assurance model, or reducing the number of audits completed.	20	0	0	20	Red	The saving proposal was set many years ago with the intention of increasing assurances from other sources. This would require audit to provide assurances on fewer areas, thereby reducing the cost of internal audit. The Head of Audit and Risk Management has reviewed the level of assurances sought from audit, which remains at the same level as previous years and it is therefore unlikely the savings will be achieved. The review did highlight the opportunity to recharge the cost of audits and this will be reviewed after the end of this financial year once this year's audit plan is delivered.
YC1	Out of home advertising income generation	The proposal is to recommission the street furnishing advertising contract. Moving to digital display to ensure communication messages can be updated quickly, and to remove printing costs.	5	5	5	0	Green	
20/25-YC02	Income from joining the London Counter Fraud Hub	The London Counter Fraud Hub, managed by CIPFA, is a counter fraud service developed to supply data analytics, investigations and recoveries service for London local authorities and the City of London Corporation. Unlike traditional data matching hubs, this project is an end-to-end service providing expert advice and operational support around sophisticated analytics. The overarching objective for the service is to increase fraud and corruption detection, and improve fraud prevention, share common risks across London, minimise losses and maximise recovery, so that fraud and corruption does not pay. Three data sources (Council Tax - Single Person Discount, Housing Tenancy and Non Domestic Rate records are entered into the analytics part of the Hub through a secure transfer. Using sophisticated technology, the Hub will analyse the data to identify frauds against the 32 London local authorities and the City of London Corporation.	25	25	25	0	Green	

20/25-YC10	Additional sites for on street digital advertising	The proposal is to generate an income from the advertising opportunities in the borough. While we have recently awarded contract for our digital on street advertising, we are now looking at other forms of advertsing, which are sympathetic to the surroundings and maximise the councils commercial returns. This is in the form of street advertising, out of home advertising, and libraries/customer services advertising.	52	26	26	26	Amber	There will be a short fall in the number of units, as Clear channel are only looking at one additional site as the company recovers from the pandemic - this proposal was based on 5 to 10 additional sites pre-pandemic. This will incur a shortfall of £26k.
YC106	Reduction in Legal Services Support		163	163	163	0	Green	
YC105	Digital Services - Establishment Savings		250	250	250	0	Green	
YC101	Finance Savings		202	202	202	0	Green	
YC109	HR Savings		105	105	105	0	Green	
Total: Your Council			**822**	**776**	**776**	**46**	**0**	**0**
	Digital Together	Cross-Cutting Saving Proposal	750	90	90	660	Amber/ Red	As well as the £90k of cashable savings there have been a further £170k of non-cashable savings achieved through cost avoidance. However it is acknowledged that the programme will fall short of the savings target for Year 1. A lack of engagement at a Corporate level has hampered progress and some of the originally identified opportunities have not yielded forecast benefits.
			1,572	**866**	**866**	**706**		

2021/22 Capital Monitoring, @ Quarter Three (Dec. 2021) Projection Sheet

Appendix 4

SCHEME REF	SCHEME NAME	BRIEF DESCRIPTION OF CAPITAL SCHEME	21/22 Full year Revised Budget £'000	2021/22 Full year Forecast Outturn £'000	Budget Variance (Underspend) / Overspend £'000	Variance Btw. Forecasts £'000
101	Primary Sch - repairs & maintenance	A range of repairs to various schools covering boiler replacement, rewiring and other items.	6,845	5,339	(1,505)	(161)
102	Primary Sch - mod & enhance (Inc SEN)	A range of larger, substantial repairs to schools such as re roofing works, new windows, and major fabric replacement	24,126	18,707	(5,419)	(3,857)
103	Primary Sch - new places	To fund expansion of schools if required	362	49	(313)	0
104	Early years	To provide funding to increase/secure early years places	205	0	(205)	(10)
109	Youth Services	This budget is provision for the borough's Youth Services projects.	229	178	(50)	(51)
110	Devolved Sch Capital	This is passed 100% to schools	531	531	(0)	(0)
114	Secondary Sch - mod & enhance (Inc SEN)	A range of larger, substantial repairs to schools such as re roofing works, new windows, and major fabric replacement	5,029	1,871	(3,158)	(131)
117	Children Safeguarding & Social Care	This scheme is designed to increase the capacity to retain LAC in-borough	495	408	(87)	303
118	Special Educational Needs Fund (New Provision Fund)	This scheme is to fund the SEND programme and the budget has been transferred scheme 102.	1,024	0	(1,024)	0
121	Pendarren House	Works to the facility to bring it to a high standard of repair	858	702	(156)	2
122	Alternative Provision Strategy	To fund capital works that increase the number of AP places in the borough	0	8	8	8
123	Wood Green Youth Hub	This budget is provision for the new W.G Youth Hub	1,223	339	(883)	(883)
199	P1 Other (inc Con't & Social care)	This is a small programme contingency budget.	98	0	(98)	(14)
People - Children's			41,024	28,133	(12,891)	(4,793)

The quarter 3 forecast outturn is showing a further reduction in forecast by £4.8m from quarter 2. This is largely due to £4m anticipated slippage and delays in works being carried out within the major capital works on both Primary and Secondary School Modifications & Enhancements budgets. The Wood Green Youth Hub forecast has also reduced by circa £0.9m, due to procurement delays. There are other minor budget variances within some other capital schemes.

201	Aids, Adap's & Assistive Tech -Home Owners (DFG)	Grant funded programme of aids and adaptations to enable people to remain in their home	3,581	3,581	0	0
207	New Day Opp's Offer	This budget is funding for The Haven/Roundways project	66	178	113	0
208	Supported Living Schemes	Funding to convert property to supported living schemes reducing high cost placements with no loss of quality of service	456	520	64	520
209	Assistive Technology	The funding for AT will provide a greater range of Assistive Technology interventions that will enable individuals to live independently and safely for longer in their own homes, as well as greater opportunity for improved outcomes through better information and proactive	1,759	795	(964)	(27)
211	Community Alarm Service	This is the funding for the capital element of the service	177	177	0	0
212	Linden House Adaptation	This project is complete with a minor retention	35	65	30	10
213	Canning Crescent Assisted Living	This project is to provide a number of assisted living places	3,581	2,478	(1,104)	(1,104)
214	Osborne Grove Nursing Home	The scheme is in development to provide a 70 bed nursing home.	1,783	853	(929)	(725)
216	Homelessness Hub	The scheme is in development to provide a 70 bed nursing home.	0	0	0	0
217	Burgoyne Road (Refuge Adaptations)	This project is to provide a new women's refuge	736	33	(702)	(198)
218	Social Emotional & Mental Health Provision	This budget is to provide funding to provide additional in borough provision	900	0	(900)	0
221	Social Care System Implementation	This budget is to provide funding for the implementation of a new social care system	1,600	0	(1,600)	(1,051)
222	Wood Green Integrated Care Hub	This budget is provision for the new W.G Integrated care hub Hub	2,000	0	(2,000)	0
People - Adults			**16,673**	**8,680**	**(7,993)**	**(2,575)**

Adults capital programme has increased by £2m in quarter 3. This is in relation to an additional £1m CCG grant funding, which has been added to the newly created capital scheme 222 - Wood Green Integrated Care Hub. Furthermore, £0.4m - Tottenham Hale DEN & £0.6m - Wood Green DEN has been transferred to capital scheme 222.

Adults quarter 3 position is reporting an underspend variance against quarter 2 of £2.6m. Reason for the variance can be attributed to project delays within the following capital programme schemes: Canning Crescent Assisted Living - £1.1m, Social Care System Implementation - £1m and Osborne Grove Nursing Home - £0.7m. There are other minor budget variances.

301	Street Lighting	This is the annual investment in capital maintenance	1,513	1,262	(250)	(1)
302	Borough Roads	This is the annual investment in capital maintenance	4,716	4,365	(351)	236
303	Structures (Highways)	This is the annual investment in capital maintenance	526	49	(477)	(50)
304	Flood Water Management	This is the annual investment in capital maintenance	909	723	(187)	(86)
305	Borough Parking Plan	This funding underpins the borough parking plan	714	384	(330)	38
307	CCTV	This funding underpins the borough CCTV plan	1,784	2,715	931	328
309	Local Implementation Plan(LIP)	This funding is provided by TfL for infrastructure works called the Local Implementation Plan (LIP)	1,169	1,169	0	(20)
310	Developer S106 / S278	This funding is provided by developers to offset the deleterious effect of their development so that it is acceptable in planning terms	869	737	(132)	194
311	Parks Asset Management:	This is the annual investment in capital maintenance	458	278	(181)	(181)
313	Active Life in Parks:	This is the annual investment in capital maintenance	1,014	325	(690)	(690)
314	Parkland Walk Bridges	Investment in the refurbishment of a number of bridges	1,133	975	(159)	(159)
317	Down Lane MUGA	This budget is to cover investment in Down Lane Park	57	57	0	0
321	MOPAC - Crime & Disorder Reduction	This is a grant funded scheme	49	0	(49)	(49)
322	Finsbury Park	This budget is to cover investment in Finsbury Park funded through the events income	135	135	0	0
323	Parking Strategy	This funding underpins the borough parking strategy	1,160	674	(486)	(185)
325	Parks Vehicles	This budget is to be used for the procurement of energy efficient park vehicles. It is self-funding and is aimed to reduce carbon emissions.	0	0	0	0
328	Street & Greenspace Greening Programme	This is an annual programme of investment in street & greenspace tree planting programme. The programme is used to match fund other external funds and sponsorship opportunities to deliver circa 200-250 trees per year. The current programme is much greater than this due to a large grant from the Urban Tree Challenge Fund and NCIL funding in four wards.	283	283	0	0

329	Park Building Carbon Reduction and Improvement Programme	A four year programme to improve the quality of the parks operational estate (13 buildings) including reducing the energy consumption and water usage by installing new technologies to reduce the carbon emissions to Zero in line with the Climate Action Plan targets for 2027.	1,050	100	(950)	0
331	Updating the boroughs street lighting with energy efficient Led light bulbs	This budget supports the upgrade of the borough's lighting to LED bulbs	4,151	3,430	(721)	(1)
332	Disabled Bay/Blue Badge	The scheme is to fund new disabled bays and to upgrade existing ones.	552	130	(422)	20
333	Waste Management	To upgrade waste infrastructure in the public realm	270	48	(222)	(222)
334	Parks Depot Reconfiguration	A one off programme to facilitate the rationalisation of the parks operational depots across the borough.	400	50	(350)	(200)
335	Streetspace Plan	This scheme is to improve the street environment within Haringey.	5,100	842	(4,258)	(887)
336	New River Sports & Fitness	This scheme is to improve the street environment within Haringey.	305	305	0	0
419	NPD Phase 2 LBH Match Funding	This scheme is now concluded.	5	0	(5)	(5)
119	School Streets	The funding is to support the roll out of the schools streets initiative	1,105	341	(764)	(689)
444	Marsh Lane	The scheme is to provide a new depot on Marsh Lane, to be completed by November 2021	8,754	8,455	(298)	(0)
447	Alexandra Palace - Maintenance	The funding is made up of a regular £470k capital maintenance budget for the upkeep of the palace. In addition there are two projects underway	2,921	1,822	(1,100)	0
472	JLAC Match Fund	The scheme is to refurbish elements of Jackson Lane Arts Centre	880	766	(114)	370
606	Hornsey Library Refurbishment	This scheme is now concluded.	16	56	40	1
621	Libraries IT and Buildings upgrade	This is a programme of upgrades to the libraries in the borough	1,996	721	(1,275)	(164)
623	Wood Green Library	The funding is to undertake upgrades to Wood Green library	1,000	0	(1,000)	(22)
652	Libraries - Re-imaging our Libraries offer for a better future	This is a self funding budget to drive greater use in the libraries	0	0	0	0
Place - Safe & Sustainable Places			44,994	31,196	(13,798)	(2,422)

The Place capital programme has increased by £1.1m re: budget transfer of £1.1m from the approved capital programme contingency to the Alexandra Palace and Park capital budget for urgent capital works.

The quarter 3 forecast is showing a reduction in forecast of £2.4m from quarter 2. This is largely due to £0.9m reduction in forecast spend on the Streetspace Plan budget, which is anticipated to be allocated over a 3 year period. There are further anticipated reduction in spend on School Streets - £0.7m and Active Life in Parks - £0.7m, due to delays in project surveys and planning works. There are other minor budget variances.

401	Tottenham Hale Green Space	This budget is to deliver improvements to Down Lane Park and the Paddock green spaces	**1,352**	**735**	**(616)**	**(416)**
402	Tottenham Hale Streets	This budget is to deliver public realm improvements in Tottenham Hale	**1,759**	**1,707**	**(53)**	**(53)**
404	Good Economy Recovery plan	This scheme is to provide interventions in high streets, to promote economic activities.	**1,637**	**848**	**(789)**	**10**
406	Opportunity Investment Fund	The budget is provided by the GLA and is used to provide loans to businesses	**542**	**50**	**(492)**	**(492)**
411	Tottenham Heritage Action Zone (HAZ)	This budget funded by Historic England is to deliver shop front improvements, heritage restoration and public realm improvements within Bruce Grove Conservation Area	**1,579**	**1,267**	**(312)**	**(0)**
415	North Tott Heritage Initiative	This budget funded by National Heritage Lottery Fund is to deliver shop front improvements in Northumberland Park Conservation Area	**360**	**298**	**(63)**	**12**
418	Heritage building improvements	This scheme is largely grant-funded, to undertake works to private properties, to safeguard heritage buildings.	**1,589**	**1,589**	**0**	**1**
421	HRW Acquisition	The budget is for the acquisition of properties as part of the HRW redevelopment. The costs will be met by the developer.	**13,882**	**13,882**	**0**	**7,238**
427	White Hart Lane Public Realm (LIP)	The budget is for the acquisition of properties as part of the HRW redevelopment. The costs will be met by the developer.	**0**	**(8)**	**(8)**	**(8)**
429	Site Acq (Tott & Wood Green)	The budget is to provide the capacity to respond to opportunities to acquire properties. The spending of the budget is subject to a business case.	**3,180**	**3,181**	**0**	**(285)**
430	Wards Corner CPO	The budget is to provide resources to undertake the CPO process on Wards Corner.	**7**	**7**	**0**	**7**
438	Vacant possession Civic Centre (Woodside House Refurbishment)	This is a retention budget for this completed scheme.	**0**	**(1)**	**(1)**	**0**
452	Low Carbon Zones	This budget is used to undertake works pertaining to the neighbourhood of the future projects, which is solely funded by TfL	**200**	**9**	**(192)**	**(144)**

453	New workspace scheme at Stoneleigh Road car park	This budget is for the provision of mixed use workspace and housing. This budget is for the workspace element	**0**	**0**	**0**	**0**
454	HALS Improvement Programme	The scheme is to improve the physical environment of the service and to improve its on line offer	**304**	**341**	**37**	**116**
455	Replacement Cloud based IT solutions for Planning, Building Control & Land Charges	The funding is to be used for a replacement IT solution for planning	**642**	**187**	**(455)**	**(218)**
457	Future High Sreeet Project	This budget funded by MHCLG is to deliver site acquisition, public realm improvements, workspace, market, community spaces and CCTV investments in Seven Sisters, Tottenham Green and Bruce Grove.	**6,302**	**4,412**	**(1,890)**	**(399)**
458	SIP - Northumberland PK BB & WorkSpace/Biz Support	This is a grant funded project to deliver broadband and Workspace/business support.	**252**	**354**	**102**	**102**
459	Wood Green Regen Sites	This scheme is to deliver the WG cultural quarter, WG central and Turnpike lane improvement plan.	**788**	**141**	**(647)**	**(100)**
464	Bruce Castle	The funding it to match fund eternal funding (should there be any) and spend is subject to a successful business case	**557**	**88**	**(469)**	**(169)**
465	District Energy Network (DEN)	The funding is to support the creation of a decentralised energy network and is subject to a successful business case	**560**	**445**	**(115)**	**(114)**
466	Redevelopment of Waltheof Gardens	The funding is to support the creation of a decentralised energy network and is subject to a successful business case	**0**	**7**	**7**	**7**
468	Keston Road (Community Centre Reprovision)	The funding is to support the creation of a decentralised energy network and is subject to a successful business case	**0**	**5**	**5**	**5**
470	Wood Green Library & Customer Service Centre	This budget is for the development of the WG headquarters and associated works	**7,788**	**0**	**(7,788)**	**0**
471	Tailoring Academy Project	This is a grant to the Tailoring Academy	**15**	**10**	**(5)**	**5**
473	Enterprising Tottenham High Road (ETHR)	This budget funded by GLA is to invest in workspace in Bruce Grove	**1,181**	**440**	**(741)**	**33**
474	Tottenham High Road Strategy	The budget is the LBH contribution to support delivery of projects within Tottenham High Road strategy area	**807**	**761**	**(46)**	**40**

475	Heart of Tottenham (HOT)	This budget is for the delivery of the Tottenham Green phase two works, which entails the creation of a new public square (behind the old town hall), hard & soft landscaping and a new Library garden.	173	186	14	(11)
478	Wood Green Good Growth Fund	This is a GLA funded scheme to promote growth in WG area.	710	369	(341)	(271)
479	54 Muswell Hill Health Centre	The Council is leasing the property to the NHS and the funding is to undertake some remedial works to the property and cover professional fees	100	0	(100)	0
480	Wood Green Regen (2)	This budget is to facilitate the wider regeneration of the WG area.	1,792	924	(868)	(159)
481	Strategic Investment Pot	This is funding provided the Corporation of London for economic development purposes	2,031	38	(1,993)	(913)
482	Strategic Property	This is funding for works to the commercial portfolio	5,202	0	(5,202)	0
483	Production Valley Fund (SIP)	This budget provides loans to businesses and is funded by the Corporation of London	643	685	42	42
488	Liveable Seven Sisters (LSS)	This budget is to deliver public realm and parks improvements in Seven Sisters	0	0	0	0
493	Bruce Grove Yards (BGY)	This budget is to deliver public realm improvements in Bruce grove	0	0	0	0
4001	Maintenance of Tottenham Green Workshops	This is to undertake landlord works at the site	681	39	(643)	9
4002	Northumberland Park estate area public realm	This funding is to improve the public realm in this area	500	3	(497)	(247)
4003	Tottenham Hale Housing Zone Funding	This budget funded by GLA is to invest in public realm within the Tottenham Hale Housing Zone	532	532	(0)	0
4005	SME Workspace Intensification	The funding is to intensify use of the Council's industrial estate and spend is subject to a successful business case	684	112	(572)	112
4006	Acquisition of head leases	The funding is to acquire headleases and any acquisition will be subject to a successful business case	485	485	0	(4,915)

4007	Tottenham Hale Decentralised Energy Network (DEN)	The funding is to support the creation of a decentralised energy network and is subject to a successful business case	**285**	**250**	**(35)**	**(435)**
4008	Wood Green Decentralised Energy Network (DEN)	The funding is to support the creation of a decentralised energy network and is subject to a successful business case	**485**	**250**	**(235)**	**(410)**
4009	Additonal Carbon Reduction Project	This budget is to assist other capital schemes to become more carbon efficient and it is self-funded.	**500**	**0**	**(500)**	**(150)**
4010	Selby Urban Village Project	The funding is to support the redevelopment of the Selby Centre and associated works	**1,197**	**607**	**(590)**	**(56)**
4011	Commercial Property Remediation	Funding to undertake landlord obligations.	**109**	**331**	**222**	**148**
4993	Pride in the High Road (PITHR)	This budget is to deliver placemaking / identity projects along Tottenham High Road	**0**	**0**	**0**	**0**
Economy - Growth & Employment			**61,392**	**35,564**	**(25,828)**	**(2,078)**

The Economy capital programme has increased by £10m re: Mayor's Land Fund grant from GLA, under scheme 421 - High Road West. Furthermore, the Wood Green Regen (2) capital programme budget has been reprofiled forward from future years into current year by £1.53m, in line with project delivery.
In contrary, £0.4m - Tottenham Hale DEN & £0.6m - Wood Green DEN has been transferred to capital scheme 222. Finally, £22k balance from the completed George Meehan (Woodside) House refurbishment budget has been transferred to capital contingency.

The quarter 3 forecast is reporting a forecast reduction of £2m in comparison to quarter 2. The major contributors to the variance is due to anticipated reduction in spend on Scheme 4006 - Acquisition of Head Leases, resulting from delay in the Munro Works purchase of Freehold due to complete next financial year. This has been patially offset by an increase in forcast within High Road West (HRW) relating to the Mayor's fund grant remittance due in March 2022. There are a range of other smaller slippages and minor variations.

509	CPO - Empty Homes	The budget is to allow the Council to undertake CPO on properties should it be required	314	314	0	314
512	Wholly Owned Company	The funding is to enable the establishment of a company should it be decided to establish one.	0	0	0	0
Housing (GF) Homes & Communities			**314**	**314**	**0**	**314**
Quarter 3 Housing General Fund budget is reporting a forecast variation from quarter 2 of £0.3m, due to a CPO payment. The budgets contained within this area are framework budget, the CPO budget, £8.1m and the budget for the Wholly Owned Company, £5m.						
601	Business Imp Programme	This budget is funding IT development to support the new ways of working	122	44	(78)	0
602	Corporate IT Board	This budget is funding IT development to support the new ways of working	1,520	825	(695)	(407)
604	Continuous Improvement	This budget delivers upgrade to the council's IT infrastructure.	2,245	2,245	(0)	144
605	Customer Services (Digital Transformation)	This budget is to provide capital works at the WG Customer Services centre.	471	170	(301)	(51)
607	Financial Management System Replacement	The budget is to fund upgrades to the existing SAP system to enhance functionality	2,522	13	(2,509)	(1,839)
622	Customer First	This budget is to support the delivery of the councils Customer First strategy.	101	95	(6)	(10)
624	Digital Together	This budget is to support the delivery of the councils Customer First strategy.	500	0	(500)	0
639	Ways of Working	This budget is to support the delivery of the councils accommodation strategy.	483	115	(368)	26
640	Accommodation Move	This budget supports capital expenditures associated with office moves.	0	(0)	(0)	(0)
650	Connected Communities	This budget provides capital funds to support the Connected Communities initiative.	1,258	0	(1,258)	0

653	Capital Support for IT Projects	This budget provides IT support to other schemes in the programme and it's self-funding.	**784**	**0**	**(784)**	**(341)**
698	Responsiveness Fund	The budget is to allow the Council to respond to in year match funding opportunities	**2,000**	**2,000**	**0**	**0**
316	Asset Management of Council Buildings	This scheme funds works to the council's operational buildings.	**9,222**	**4,736**	**(4,486)**	**(3,667)**
330	Civic Centre Works	This scheme is for the Civic centre refurbishment works	**7,703**	**718**	**(6,985)**	**(6,985)**
699	P6 - Approved Capital Programme Contingency	This is the approved capital programme contingency.	**1,110**	**1,110**	**0**	**(1,077)**
Your Council			**30,040**	**12,071**	**(17,969)**	**(14,209)**

The agreed council's capital contigency budget has decreased by net £1.78m. The reason for the decrase is due to £1.1m budget being transferred to Alexandra Palace and Park for urgent capital works from the approved capital programme contingency. Conversely, the decrease in budget has been partially offset by £22k budget transfer from the completed George Meehan (Woodside) House refurbishment works budget under the Economy priority group.

The quarter 3 forecast is an underspend variance of £14.2m from quarter 2. The main contributors to this variance is attributable to both Civic Centre Works - £7.0m and Corporate Landlord budget - £3.7m, due to delays in the project delivery . The Financial Systems Management budget is also anticipating an inyear forecast spend reduction of £1.8m. Finally, the agreed capital contingency foreast has reduced in forecast by £1.1m. There are other minor variations.

TOTAL GF CAPITAL PROGRAMME			**194,437**	**115,958**	**(78,478)**	**(25,763)**
202	HRA - P2 Aids, Adap's & Assist Tech - Council	Adaptations capital works for Council HRA properties to enable identified residents to help live an independent life.	**1,100**	**1,100**	**0**	**0**
550	New Homes Acquisition	Acquisition of new homes to supplement the existing HRA housing stock	**75,441**	**37,414**	**(38,027)**	**(400)**
551	Existing Home Acquisitions - TA	Acquisition of existing homes to supplement existing HRA housing stock	**33,877**	**22,093**	**(11,784)**	**(9,639)**
552	HRA – P5 Carbon Reduction	HRA capital programme contribution to the authorities overall climate change action plan to substantially reduce carbon emissions in the housing stock (managed by HfH)	**5,892**	**269**	**(5,623)**	**(4,932)**
553	HRA – P5 Fire Safety	HRA capital programme fire safety essential compliance works to the housing stock. (managed by HfH)	**15,329**	**8,815**	**(6,514)**	**2,458**
554	Broadwater Farm Project	Demolition and re-building of identified blocks within the Broadwater Farm estate due to urgent health & safety issues.(managed by HfH)	**14,529**	**7,819**	**(6,710)**	**(28)**
590	HRA - P5 Homes for Haringey (HFH)	HRA housing stock original capital existing stock programme , includes internal and external major , legacy decent homes and Noel park pods works programmes. (managed by HfH)	**64,178**	**31,303**	**(32,875)**	**(7,982)**
599	New Homes Build Programme	Building of new homes to supplement and increase the existing HRA housing stock	**66,687**	**16,951**	**(49,736)**	**(5,864)**
TOTAL HRA CAPITAL PROGRAMME			**277,033**	**125,764**	**(151,269)**	**(26,387)**
The Quarter 3 annual spend forecast has reduced slightly compared to quarter 2 forecast. This is due to previously reported issues about the impact Covid, and Brexit have had on supply of materials and building costs. These led to delays on some onsite activity and procurement processes. Additionally, Covid has impacted on resources in the various teams tasked with delivering the programmes, as well as supporting Teams. There are also delays in obtaining planning permissions for the Noel Park project and continued issues of access and material suppliers for internal projects due to the pandemic.						
OVERALL CAPITAL PROGRAMME			**471,470**	**241,722**	**(229,748)**	**(52,150)**

2021/26 (GF) CAPITAL MTFS BUDGET (INCLUDING 2020/21 C/F's) AS AT QUARTER THREE Appendix 5

SCHEME REF	SCHEME NAME	2021/22 Revised Budget	2021/22 (IN-YEAR) Budget Virement	2021/22 (FUTURE YEARS) Budget Virement	2021/22 Revised Budget (after Virement)	2022/23 Budget	2023/24 Budget	2024/25 Budget	2025/26 Budget	2021/22 - 25/26 Total
		£,000	£,000	£,000	£,000	£,000	£,000	£,000	£,000	£,000
101	Primary Sch - repairs & maintenance	**5,091**	**1,754**		**6,845**	5,700	5,000	5,000	5,000	**27,545**
102	Primary Sch - mod & enhance (Inc SEN)	**28,755**	**(2,002)**	**(2,627)**	**24,126**	15,452	13,480	11,000	4,000	**68,058**
103	Primary Sch - new places	**362**			**362**	0	0	0	0	**362**
104	Early years	**205**			**205**	0	0	0	0	**205**
109	Youth Services	**229**			**229**	0	0	0	0	**229**
110	Devolved Sch Capital	**531**			**531**	531	531	531	531	**2,655**
114	Secondary Sch - mod & enhance (Inc SEN)	**5,997**		**(968)**	**5,029**	270	270	270	270	**6,107**
117	Children Safeguarding & Social Care	**495**			**495**	0	0	0	0	**495**
118	Special Educational Needs Fund (New Provision Fund)	**0**	**1,024**		**1,024**	0	0	0	0	**1,024**
121	Pendarren House	**2,276**		**(1,418)**	**858**	2,243	2,913	70	0	**6,084**
122	Alternative Provision Strategy	**1,300**		**(1,300)**	**0**	600	1,800	4,800	4,800	**12,000**
123	Wood Green Youth Hub	**1,015**	**208**		**1,223**	0	0	0	0	**1,223**
199	P1 Other (inc Con't & Social care)	**223**		**(125)**	**98**	125	0	0	0	**223**
People - Children's		**46,478**	**984**	**(6,438)**	**41,024**	**24,921**	**23,994**	**21,671**	**14,601**	**126,209**
201	Aids, Adap's & Assistive Tech -Home Owners (DFG)	**3,095**	**486**		**3,581**	2,193	2,193	2,193	2,200	**12,360**
207	New Day Opp's Offer	**66**			**66**	0	0	0	0	**66**
208	Supported Living Schemes	**6,456**		**(6,000)**	**456**	4,500	3,000	3,000	0	**10,956**
209	Assistive Technology	**1,759**			**1,759**	500	0	0	0	**2,259**
211	Community Alarm Service	**177**			**177**	177	177	177	177	**885**
212	Linden House Adaptation	**35**			**35**	0	0	0	0	**35**
213	Canning Crescent Assisted Living	**6,390**		**(2,809)**	**3,581**	100	0	0	0	**3,681**
214	Osborne Grove Nursing Home	**17,783**		**(16,000)**	**1,783**	6,036	34,504	2,545	**1,094**	**45,962**
217	Burgoyne Road (Refuge Adaptations)	**2,736**		**(2,000)**	**736**	2,250	0	0	0	**2,986**
218	Social Emotional & Mental Health Provision	**900**			**900**	600	600	600	0	**2,700**
221	Social Care System Implementation	**1,600**			**1,600**	1,600	0	0	0	**3,200**
222	Wood Green Integrated Care Hub	**0**	**2,000**		**2,000**	0	0	0	0	**2,000**
People - Adults		**40,996**	**2,486**	**(26,809)**	**16,673**	**17,956**	**40,474**	**8,515**	**3,471**	**87,089**

119	School Streets	**1,105**			**1,105**	600	600	600	0	**2,905**
301	Street Lighting	**1,513**			**1,513**	1,300	1,300	1,300	1,300	**6,713**
302	Borough Roads	**4,716**			**4,716**	4,769	6,044	6,924	6,924	**29,377**
303	Structures (Highways)	**526**			**526**	0	0	0	0	**526**
304	Flood Water Management	**734**	**175**		**909**	680	710	0	0	**2,299**
305	Borough Parking Plan	**714**			**714**	321	321	321	321	**1,998**
307	CCTV	**1,784**			**1,784**	1,000	550	0	0	**3,334**
309	Local Implementation Plan(LIP)	**1,949**	**(780)**		**1,169**	1,000	1,000	1,000	1,000	**5,169**
310	Developer S106 / S278	**869**			**869**	250	250	250	250	**1,869**
311	Parks Asset Management:	**433**	**26**		**458**	300	300	300	300	**1,658**
313	Active Life in Parks:	**1,014**			**1,014**	230	230	230	230	**1,934**
314	Parkland Walk Bridges	**2,252**		**(1,119)**	**1,133**	1,615	85	0	0	**2,833**
317	Down Lane MUGA	**57**			**57**	0	0	0	0	**57**
321	MOPAC - Crime & Disorder Reduction	**49**			**49**	0	0	0	0	**49**
322	Finsbury Park	**1,135**		**(1,000)**	**135**	600	600	1,000	0	**2,335**
323	Parking Strategy	**960**	**200**		**1,160**	0	0	0	0	**1,160**
325	Parks Vehicles	**720**		**(720)**	**0**	720	0	0	0	**720**
328	Street & Greenspace Greening Programme	**283**			**283**	100	100	100	0	**583**
329	Park Building Carbon Reduction and Improvement Programme	**1,050**			**1,050**	800	800	0	0	**2,650**
331	Updating the boroughs street lighting with energy efficient Led light bulbs	**4,151**			**4,151**	0	0	0	0	**4,151**
332	Disabled Bay/Blue Badge	**552**			**552**	0	0	0	0	**552**
333	Waste Management	**270**			**270**	200	0	0	0	**470**
334	Parks Depot Reconfiguration	**400**			**400**	0	0	0	0	**400**
335	Streetspace Plan	**5,370**	**(270)**		**5,100**	0	0	0	0	**5,100**
336	New River Acquisition	**0**	**305**		**305**					**305**
419	NPD Phase 2 LBH Match Funding	**5**			**5**	0	0	0	0	**5**
444	Marsh Lane	**8,754**			**8,754**	266	0	0	0	**9,020**
447	Alexandra Palace - Maintenance	**470**	**2,451**		**2,921**	470	470	470	470	**4,801**
472	JLAC Match Fund	**880**			**880**	0	0	0	0	**880**
606	Hornsey Library Refurbishment	**0**	**16**		**16**	0	0	0	0	**16**
621	Libraries IT and Buildings upgrade	**1,996**			**1,996**	0	0	0	0	**1,996**
623	Wood Green Library	**1,000**			**1,000**	1,000	0	0	0	**2,000**
652	Libraries - Re-imaging our Libraries offer for a better future	**650**		**(650)**	**0**	650	0	0	0	**650**
Place - Safe & Sustainable Places		**46,360**	**2,123**	**(3,489)**	**44,994**	**16,871**	**13,360**	**12,495**	**10,795**	**98,515**

401	Tottenham Hale Green Space	**810**		**542**	**1,352**	4,406	2,055	**4,849**	0	**12,661**
402	Tottenham Hale Streets	**11,221**		**(9,461)**	**1,759**	9,143	800	**1,319**	0	**13,021**
4003	Tottenham Hale Housing Zone Funding	**6,735**		**(6,203)**	**532**	10,989	0	**3,203**	0	**14,724**
404	Good Economy Recovery plan	**1,637**			**1,637**	500	100	0	0	**2,237**
406	Opportunity Investment Fund	**542**			**542**	0	0	0	0	**542**
411	Tottenham Heritage Action Zone (HAZ)	**1,319**	**260**		**1,579**	2,000	1,200	0	0	**4,779**
415	North Tott Heritage Initiative	**360**			**360**	0	0	0	0	**360**
418	Heritage building improvements	**1,589**			**1,589**	0	0	0	0	**1,589**
421	HRW Acquisition	**107,738**	**10,000**		**117,738**	3,940	6,830	6,000	4,600	**139,108**
429	Site Acq (Tott & Wood Green)	**57,072**			**57,072**	14,000	10,000	12,000	0	**93,072**
430	Wards Corner CPO	**10,000**			**10,000**	0	0	0	0	**10,000**
435	Wood Green Station Road	**0**			**0**	0	0	0	0	**0**
438	Vacant possession Civic Centre (Woodside House Refurbishment)	**22**	**(22)**		**0**	0	0	0	0	**0**
452	Low Carbon Zones	**50**	**150**		**200**	0	0	0	0	**200**
453	New workspace scheme at Stoneleigh Road car park	**400**	**(400)**		**0**	1,000	0	0	0	**1,000**
454	HALS Improvement Programme	**125**	**178**		**303**	0	0	0	0	**303**
455	Replacement Cloud based IT solutions for Planning, Building Control & Land Charges	**642**			**642**	0	0	0	0	**642**
457	Future High Sreeet Project	**0**	**6,302**		**6,302**	0	0	0	0	**6,302**
458	SIP - Northumberland PK BB & WorkSpace/Biz Support	**0**	**1,742**	**(1,490)**	**252**	1,490	0	0	0	**1,742**
459	Wood Green Regen Sites	**0**	**788**		**788**	0	0	0	0	**788**
464	Bruce Castle	**5,557**		**(5,000)**	**557**	6,000	8,500	5,000	0	**20,057**
465	District Energy Network (DEN)	**2,331**		**(1,771)**	**560**	6,500	3,500	1,771	0	**12,331**
470	Wood Green Library & Customer Service Centre	**7,788**			**7,788**	6,400	7,000	6,000	0	**27,188**

471	Tailoring Academy Project	**15**			**15**	0	0	0	0	**15**
473	Enterprising Tottenham High Road (ETHR)	**1,907**	**(726)**		**1,181**	451	0	0	0	**1,632**
474	Tottenham High Road Strategy	**484**	**323**		**807**	587	0	0	0	**1,394**
475	Heart of Tottenham (HOT)	**773**	**(600)**		**173**	0	0	0	0	**173**
478	Wood Green Good Growth Fund	**50**	**659**		**710**	0	0	0	0	**710**
479	54 Muswell Hill Health Centre	**100**			**100**	0	0	0	0	**100**
480	Wood Green Regen (2)	**9,269**	**(1,447)**	**(6,030)**	**1,792**	6,402	7,750	8,664	7,627	**32,235**
481	Strategic Investment Pot	**2,831**	**(800)**		**2,031**	1,950	0	0	0	**3,981**
482	Strategic Property	**5,202**			**5,202**	254	3	0	0	**5,459**
483	Production Valley Fund (SIP)	**643**			**643**	0	0	0	0	**643**
488	Liveable Seven Sisters (LSS)	**1,704**	**(1,704)**		**0**	2,250	1,019	0	0	**3,269**
493	Bruce Grove Yards (BGY)	**1,326**	**(1,326)**		**0**	1,670	218	0	0	**1,888**
4001	Maintenance of Tottenham Green Workshops	**681**			**681**	0	0	0	0	**681**
4002	Northumberland Park estate area public realm	**1,000**		**(500)**	**500**	500	0	0	0	**1,000**
4005	SME Workspace Intensification	**2,116**	**(1,432)**		**684**	3,500	4,000	0	0	**8,184**
4006	Acquisition of head leases	**19,981**		**(13,000)**	**6,981**	12,000	13,000	0	0	**31,981**
4007	Tottenham Hale Decentralised Energy Network (DEN)	**1,814**	**(400)**	**(1,129)**	**285**	3,129	5,000	7,000	7,500	**22,914**
4008	Wood Green Decentralised Energy Network (DEN)	**1,614**	**(600)**	**(529)**	**485**	2,529	2,500	7,500	7,500	**20,514**
4009	Additional Carbon Reduction Project	**4,500**		**(4,000)**	**500**	3,000	3,000	3,000	4,000	**13,500**
4010	Selby Urban Village Project	**5,297**		**(4,100)**	**1,197**	25,000	25,000	15,000	21,416	**87,613**
4011	Commercial Property Remediation	**109**			**109**	0	0	0	0	**109**
4993	Pride in the High Road (PITHR)	**696**	**(696)**		**0**	432	0	0	0	**432**
Economy - Growth & Employment		**278,051**	**10,249**	**(52,671)**	**235,629**	**130,022**	**101,474**	**81,306**	**52,643**	**601,073**
509	CPO - Empty Homes	**8,050**			**8,050**	1,000	1,000	0	0	**10,050**
512	Wholly Owned Company	**5,000**			**5,000**	0	0	0	0	**5,000**
Housing (GF) Homes & Communities		**13,050**	**0**	**0**	**13,050**	**1,000**	**1,000**	**0**	**0**	**15,050**

316	Asset Management of Council Buildings	**9,222**			**9,222**	4,331	1,381	4,000	4,000	**22,934**
330	Civic Centre Works	**7,703**			**7,703**	5,500	4,500	5,000	1,250	**23,953**
601	Business Imp Programme	**122**			**122**	0	0	0	0	**122**
602	Corporate IT Board	**2,796**	**124**	**(1,400)**	**1,520**	1,400	0	0	0	**2,920**
604	Continuous Improvement	**2,245**	**0**		**2,245**	950	950	950	950	**6,045**
605	Customer Services (Digital Transformation)	**471**			**471**	0	0	0	0	**471**
607	Financial Management System Replacement	**2,522**			**2,522**	650	0	0	0	**3,172**
622	Customer First	**2,101**	**(2,000)**		**101**	0	0	0	0	**101**
624	Digital Together	**0**	**500**		**500**	0	0	0	0	**500**
639	Ways of Working	**483**			**483**	0	0	0	0	**483**
640	Accommodation Move	**0**			**0**	0	0	0	0	**0**
650	Connected Communities	**1,258**			**1,258**	0	0	0	0	**1,258**
653	Capital Support for IT Projects	**784**			**784**	450	450	450	450	**2,584**
698	Responsiveness Fund	**2,000**			**2,000**	0	0	0	0	**2,000**
699	P6 - Approved Capital Programme Contingency	**3,800**	**(2,690)**		**1,110**	0	0	0	0	**1,110**
Your Council		**35,507**	**(4,066)**	**(1,400)**	**30,040**	**13,281**	**7,281**	**10,400**	**6,650**	**67,652**
TOTAL GF CAPITAL PROGRAMME		**460,441**	**11,776**	**(90,807)**	**381,409**	**204,050**	**187,583**	**134,386**	**88,160**	**995,588**

Virements for Cabinet Approval – all within the Council's Financial Framework **APPENDIX 6**

Transfers from Reserves & Contingencies - for noting

Period	Priority	Service/AD Area	Rev/ Cap	In year	Next year	Reason for budget changes	Description
10	People	Childrens	Revenue	338,618		Transfer from Reserves	To fund an interim team while a review of the programme of current/future work is carried out.

Virements for Approval (2021/22)

8	Your Council	Corporate and Customer Services	Revenue	330,000		Budget Realignment	Realignment of one-off additional staffing support budget to reflect actual costs.
8	Your Council	Corporate Finance	Revenue	385,000	385,000	Budget Realignment	Rerealignment within the corporate levies budget to reflect actual costs.
10	People	Childrens	Revenue	452,000	452,000	Budget Realignment	Realignment of staff and grant budgets within Early Help to match establishments.
10	Your Council	Corporate and Customer Services	Revenue	349,012	349,012	Budget Adjustment	Transfer of Bad Debt Provision budget to fund Housing Benefit Overpayment Team on a permanent basis.
11	People	Childrens	Revenue	2,368,000		Budget Realignment	Reduction In Early Years budgets to reflect lower DSG allocation.
		Total 2021/22		**4,222,630**	**1,186,012**		

Proposed Capital Virements for Quarter Three (2021/22)

Priority	Scheme Number	Scheme Description	Budget Adjustment (Virement) (£)	Scheme Description
People - Adults	222	Wood Green Integrated Care Hub	1,000,000	Budget increase in anticipation to CCG Grant re WG Hub yet to be signed by the Director of Adults Services
People - Adults	222	Wood Green Integrated Care Hub	600,000	Budget transfers from scheme 4008
People - Adults	222	Wood Green Integrated Care Hub	400,000	Budget transfers from scheme 4007
			2,000,000	
Place	447	Alexandra Palace - Maintenance	1,100,000	Budget transfer from the approved capital programme contingency to the Alexandra Palace and Park for urgent capital works
			1,100,000	
Economy	421	HRW Acquisition	10,000,000	Mayor's Land Fund grant award from GLA
Economy	438	Vacant possession Civic Centre (Woodside House Refurbishment)	(22,059)	Project has now ceased and remaining budget transferred to capital contingency
Economy	480	Wood Green Regen (2)	1,528,499	Budget brought forward in current year from future years in line with project delivery
Economy	480	Wood Green Regen (2)	(432,500)	Budget transfer to scheme 478
Economy	478	Wood Green Good Growth Fund	432,500	Budget transfer from scheme 480
Economy	4007	Tottenham Hale DEN	(400,000)	Budget transfer to scheme 222
Economy	4008	Wood Green DEN	(600,000)	Budget transfer to scheme 222
			10,506,440	
Your Council	699	P6 - Approved Capital Programme Contingency	(1,100,000)	Budget transfer to the Alexandra Palace and Park for urgent capital works
Your Council	699	P6 - Approved Capital Programme Contingency	22,059	Budget transfer from the completed George Meehan (Woodside) House refurbishment budget, which is now completed
			(1,077,941)	
		OVERALL TOTAL =	**12,528,499**	

APPENDIX 7

Write off Summary Report - Quarter 3

All Council debt is considered recoverable; the Corporate Debt Management Service makes every effort to collect charges due to the Council. However, in some circumstances it is appropriate to write off a debt when all forms of recovery action have been exhausted.

Council Debt is written off in line with the instructions set out within the Financial Regulations, following Legal advice, Court instruction or in accordance with the Limitations Act 1980.

This quarterly report is for information purposes only, which details the debts that were submitted for write off for the Financial Period 1st Oct 2021 – 31st Dec 2021 **(Q3).** These relate to delinquent accounts where all forms of recovery action had been fully exhausted. The sums approved for write off by the Director of Finance under his delegated authority, have been adequately provided for in the Council's Bad Debt Provision.

The table below summarises the Q3 write off by service type, value and volume.

	Quarter 3 Write Off, Financial Period 1st Oct 2021 - 31st Dec 2021								
Service	**Council Tax**	**NNDR**	**HBOP**	**HRA Rent**	**Leaseholder**	**Commercial Rent**	**Sundry Debt**	**Parking**	**Total**
Under £50k	£79,853.55	£115,075.65	£101,038.47	£291,525.87	£0.00	£0.00	£79,540.78	£0.00	£667,034.32
Volume	165	33	42	149	0	0	34	0	423
Over £50k	£0.00	£721,663.34	£52,463.70	£0.00	£0.00	£0.00	£321,541.63	£0.00	£1,095,668.67
Volume	0	10	1	0	0	0	2	0	13
Total Value	**£79,853.55**	**£836,738.99**	**£153,502.17**	**£291,525.87**	**£0.00**	**£0.00**	**£401,082.41**	**£0.00**	**£1,762,702.99**
Total Volume	**165**	**43**	**43**	**149**	**0**	**0**	**36**	**0**	**436**

At the time of writing all but the 13 over £50k write offs had been approved. These cases totalling £1.09m are planned to go before the Lead Member (Finance) in February. The majority of the over 50k cases relate to NNDR (Business Rates) that are subject to insolvency. This means the Council has no further opportunity of recovering these debts. These are older debts (3+ years) which could have been submitted sooner although the Council used this time to ensure all avenues of collection had been exhausted with no further prospect of recovery.

The category composition of the above write offs is shown below;

Write off reason	**Sundry Debt**	**CTAX**	**NNDR**	**HBOP**	**HRA**
Bankruptcy/ 'Company Insolvent'	6%	7%	67%	0%	0%
Debtor Deceased / No Probate Granted	53%	5%	0%	24%	7%
Recommended by Legal	11%	0%	0%	0%	0%
Statute Barred	8%	0%	0%	60%	89%
OIF Loan	3%	0%	0%	0%	0%
Uneconomic to Pursue	19%	0%	0%	3%	1%
Gone Away/Whereabouts Unknown/Abscond	0%	28%	19%	3%	3%
Petty Amount	0%	60%	0%	0%	0%
Section 27 Notice Served Estate distributed	0%	0%	9%	0%	0%
Reverse Write Off	0%	0%	5%	0%	0%
Identity Fraud	0%	0%	0%	10%	0%

Moving forward the Council shall review its systems and processes to modernise the efficiency and effectiveness of identifying risks and take swift action to mitigate these risks. The outcomes of this would be three-fold;

1. Improved efficiency of debt recovery
2. Reduced uncollectable debt
3. Reduced write offs

APPENDIX 7A

Debt Write off Greater than £50,000

All large businesses or organisations expect a certain level of income to become irrecoverable and therefore plan for some levels of write-offs. Occasionally, for a variety of reasons, debts do arise which become irrecoverable. Under Haringey's constitution, debts of £50,000 or more require the approval of the Cabinet member for Finance or Cabinet.

Details of the 13 debts over £50,000 presented for write off in this quarter are set out below. The Council's bad debt provisions are sufficient to cover the full value of these write-offs.

1. **M Ltd - £57,432.26:** This Business Rates debt occurred between 2014-18. A Liability Order was obtained in February 2019. Insolvency Practitioners were instructed and the company went into liquidation. There are no assets/insufficient funds and the director is not personally liable for the debt. The conclusion of the winding-up took place October 2021 and the company was formally dissolved in January 2022.

2. **C Ltd - £99,363.92:** This Business Rates debt occurred between 2017-18. A Liability Order was obtained in July 2018 but no payments materialised although payment arrangements were made. The debt was referred to Enforcement Agents who were unable to collect as the property was reported to be empty and vacant. The company did not file any accounts so there was no evidence of its status in terms of assets/liabilities/cash in bank etc. The company was dissolved in November 2020.

3. **G Ltd - £65,871.29:** This Business Rates debt occurred between 2017-18. This company went in and out of administration for a number of years from 2018 onwards. Prior to this they had a good payment history. A Company Voluntary Arrangement (CVA) was completed in April 2018 however due to a lack of available funds, the Council did not benefit from any share of the dividend. The Council is unable to recover any further amounts.

4. **G Ltd - £75,113.38:** This Business Rates debt occurred in 2018. This is the same company as above (3) albeit a different premises. The Council is unable to recover any further amounts as G Ltd is legally released from its obligations and any remaining debts that were included in the CVA should be written off.

5. **C Ltd - £73,517.33:** This Business Rates debt occurred between 2017-18. The director notified the Council by telephone that they had vacated the property in December 2017. No evidence of this was received. Insolvency Action was commenced in March 2018. The landlord confirmed surrender of the lease was in January 2018. The company wound up in June 2018. The Official Receiver reported that the company had no assets or resources to pay any dividends to creditors.

6. **T Ltd - £58,740.70:** This Business Rates debt occurred between 2016-17. Payments totalling £48,000 were received up to the date of the Liability Order (Nov 2016) and no further payments since then despite referring to Enforcement Agents. It was confirmed that the property had been vacated around January 2017. The company was dissolved in October 2017 and there are no assets/resources. There is no further recourse to recover this debt.

7. **Ms J - £57,455.26:** This Business Rates debt occurred between 2008-09. A Liability Order was granted in 2009 for £75,256.49. Due to the lack of payments, the case was referred to Enforcement agents. Ms J was made bankrupt June 2016. In February 2021, the Official Receiver confirmed there were no assets in relation to the bankruptcy estate. The Council is unable to recover any further amounts.

8. **Ms F - £116,954.41:** This Business Rates debt occurred between 2006-19. Ms F made payments up to 2009 when payments ceased altogether. Between 2009-17, the account was passed to alternate Enforcement Agents which proved unsuccessful. Payment arrangements were made but not kept. There were no assets or anything of value to be considered against the debt. Ms F was made bankrupt in 2019. The Official Receiver confirmed in October 2020 that there were no prospects of any dividend for creditors.

9. **Mr S - £57,500.00:** This Business Rates debt occurred between 2012-16. Payments ceased in May 2012. The account was passed to Enforcement Agents each year which proved unsuccessful. After extensive work the Council remained unsuccessful in finding anything useful about the whereabouts of the ratepayer. Occupants of the property were successful in becoming owners from July 2019 on the basis of an adverse possession claim. Mr S is deemed a missing person / presumed deceased. The Council is unable to recover any further amounts.

10. **R Ltd - £59,894.79:** This Business Rates debt occurred between 2013-15. Between 2014-16 recovery action commenced via a referral to Enforcement Agents although they were unable to trace nor make contact. In December 2017 the company went into voluntary liquidation. In January 2019 it was concluded that there were no assets. There were insufficient realisations to declare a dividend to the unsecured creditors. The Council is therefore unable to recover any further amounts.

11. **Exors of Mrs M - £52,463.70:** This Housing Benefit (HB) Overpayment debt stemmed from a contrived tenancy between 1996 - 2015 which gave rise to an overpayment of £52,719.00. As the HB was paid directly to Mrs M, the overpayment was recoverable from her. Recovery action commenced in May 2016 and although some monies were recovered through attachment of benefit, the outstanding debt was returned to the Council in June 2017 with no further deductions from the DWP. No further recovery action is possible as the debtor passed away in May 2018 and has no estate nor will to claim the outstanding debt.

12. **Mr M - £118,372.30:** This Adult Social Care debt occurred between 2015-20. The debtor is deceased, and the Council's Legal service have recommended the circumstances of the case do not support any further recovery actions.

13. **C Ltd - £201,441.21:** This Opportunity Investment Fund Loan debt occurred between 2015-17. Prior to awarding the loan, the GLA and the Council jointly commissioned an independent firm of consultants to carry out a feasibility study which formed part of the assessment process. C Ltd closed in December 2017 and has since been wound up and dissolved. The Council is unable to recover any further amounts. The premises which was occupied has remained closed since the closure of C Ltd.

Covid 19 Grants Allocated 2021/22 **APPENDIX 8**

Grant Name	Grant Type	£m
Local Restrictions (Closed)	Business	5.13
Welcome Back Fund (former RHSSF - Reopening High Streets Safely Fund	Business Support	0.48
Business Restart Grant	Business Support	11.22
Additional Resctrictions Grant	Business Support	5.37
C19 Unringenced Grant (Local Authority Support Grant)	Emergency Funding	9.12
Contain Outbreak Management Fund (COMF)	Track & Trace / Outbreak Mgt	2.35
ASC Infection Control Fund 21/22 (Round 3)	Track & Trace / Outbreak Mgt	0.31
ASC Rapid Testing Fund (2) 21/22	Track & Trace / Outbreak Mgt	0.25
Local Council Tax Support Scheme	Welfare	3.61
C19 Unringenced Grant (Local Authority Support Grant)	Welfare	0.09
C-19 Winter Grant Tranche 3 (17 April to 20 June)	Welfare	0.23
C-19 Winter Grant Tranche 3 (21 June to 30 Sept)	Welfare	0.93
Self Isolation support Framework (Marcjh-June21)	Welfare	0.38
Self Isolation support Framework (July 21)	Welfare	0.09
Clinically Extremely Vulnerable Support Funding (CEV)	Welfare	0.33
Clinically Extremely Vulnerable Support Funding (CEV)	Welfare	0.20
Track & Trace April 2021 - Discretionary Payments	Welfare	0.17
Track & Trace September 2021 - Discretionary Payments	Welfare	0.09
Household Support Fund	Welfare	2.41
Track and Trace Oct-Dec 2021 Main Scheme and Administration	Welfare	0.31
Track and Trace Aug-Sept 2021 Main Scheme	Welfare	0.03
Workforce Recruitment and Retention Fund 1 (WRRF1)	Welfare	2.21
ASC Omicron support	Welfare	0.29
New Burdens 4 Restart & Additional Restrictions Grant Scheme	Welfare	0.13
Practical Support for Self Isolation (Aug - Oct 21)	Welfare	0.23
	Total	**45.95**

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Report for:	Cabinet – 8 March 2022
Title:	Road Danger Reduction Action Plan and Investment Plan for 2022-23
Report authorised by	Stephen McDonnell, Director of Environment and Neighbourhoods
Lead Officer:	Ann Cunningham, Head of Highways & Parking Ann.Cunningham@haringey.gov.uk Tim Walker, Highways and Parking Project Manager Tim.Walker@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 sets out how Haringey Council is responding at a local level to the Mayor of London's 'Vision Zero for London'.

1.2 The aim of Vision Zero[1] is to eliminate all deaths and serious injuries on London's transport system by 2041. This report focuses on an overarching approach to reducing road danger on Haringey's streets (as set out in the proposed Action Plan in Appendix 1) and the specific recommendations for investment in 2022/23 (as set out in the Investment Plan in Appendix 2).

2 Cabinet Member Introduction

2.1 The Mayor of London has set ambitious targets to eliminate all road deaths and serious injuries by 2041. This report sets out how we are working towards this target.

2.2 We have used the 'Safe Systems approach" endorsed by the Royal Society of Prevention of Accidents (RoSPA) where road safety is looked at holistically exploring road design, safe speeds, vehicle safety, safe road use and post-crash responses.

2.3 Identifying where we improve our road and pavement infrastructure will be evidence-led using data available to us and, in some instances, addressing areas where our residents have raised specific concerns. This financial year, we introduced 5 new zebra crossings and improved the crossing at the junction of Downhills Way/Lordship Lane and The Roundway. We have introduced speed restrictions on Belmont Road.

[1] https://tfl.gov.uk/corporate/safety-and-security/road-safety/vision-zero-for-london

2.4 We have just concluded consultation for a further 4 zebra crossings and are in the middle of engagement with residents, businesses and school students on what improvements they want to see on the Tottenham Lane roundabout which saw another bus crash, the 3rd in my lifetime.

2.5 Speeding is known to be a major contribution to road traffic collisions on our streets. We welcome the recent changes of reducing speed by TfL on the Trunk Road Network which fall within Haringey and are pleased to see that plans are under way to extend this rollout in Haringey. We will also be working to achieve 100% on all borough-maintained roads.

2.6 Unfortunately, we are aware not all drivers adhere to the speed restrictions in place, and we have started on a boroughwide speeding map to identify roads where we need to enhance and force compliance.

2.7 We are acutely aware that, in London, the enforcement of speeding still resides with the police and, whilst the Government extended these powers to councils outside of London, it has not done so for councils in London. We will continue to lobby for change through London Councils to have this power transferred to us.

2.8 We will be introducing Intelligent Speed Assistance (ISA) on all our Council vehicle fleets and making it a condition on future procurement. We will also continue to lobby TfL to introduce ISA on all taxis and private hire vehicles.

2.9 We have invested £300k in camera enforcement to tackle HGV drivers who still continue to flout the HGV restrictions in the borough. We will be working towards introducing more HGV restriction zones across the borough. We have also rolled out camera enforcement at restricted turns and junction boxes.

2.10 We believe we should be setting the standard and will be seeking FORS Gold Standard accreditation for all our Council fleet and introduce this as a standard needed for all our contractors.

2.11 We will be promoting methods for our residents to report cars without MOT and insurance to the enforcing authorities. We will also be conducting joint operations with the police to identify these vehicles on our roads.

2.12 We will be working with all road users to address their needs and threats to their safety.

2.13 We will enhance our relations with local police to be made aware of all serious and fatal road traffic collisions known and reported to circumvent the lengthy national reporting system. We will conduct regular post-crash assessments to learn and respond to changes.

2.14 Low traffic neighbourhoods, active travel programmes, increasing cycling infrastructure and school streets roll-out will complement our ambition to achieve Vision Zero.

3 Recommendations

Cabinet is asked:

3.1 To approve the Road Danger Reduction Action Plan, as set out in Appendix 1;

3.2 To approve the Investment Plan for 2022/23 set out in Appendix 2;

3.3 To delegate decisions relating to scheme design and implementation to the Head of Highways and Parking;

3.4 To authorise the Head of Highways and Parking to carry out any required consultation in accordance with Appendix 3 and to make any necessary traffic orders, having had due regard to any prior consultation, to give effect to those schemes; and

3.5 To authorise the Head of Highways and Parking to consider any objections and representations on road danger reduction schemes and to report back to the Cabinet Member for Customer Service, Welfare and the Public Realm if there are significant or substantial objections or concerns raised.

4 Reasons for Decision

4.1 The Council has a statutory duty under section 39 of the 1988 Road Traffic Act to "take steps both to reduce and prevent accidents". It must also prepare and carry out a programme of measures designed to promote road safety.

4.2 This report recommends the investment for 2022/23 as well as a set of wider actions that will assist in prioritisation in future years.

5 Alternative options considered

5.1 The authority has a statutory duty as set out in paragraph 4.1.

6 Background Information

6.1 In the 'Road Safety Investment Plan' report to Cabinet on 9th March 2021, it was indicated that a new 'Road Safety Strategy and Action Plan' – a key delivery plan within the Transport Strategy - would be prepared.

6.2 The report clarified that the Road Safety Strategy and Action Plan would:

- set out objectives of how road danger is intended to be reduced within the borough and will justify where interventions are required;
- include an evidence base via a borough road safety assessment;
- establish a series of measures for monitoring the Council's progress in achieving its objectives;
- most likely focus on two main areas:
  (a) supporting the Mayor's London-wide ambition to reach 'Vision Zero', by having no killed or seriously injured (KSI) casualties on Haringey's roads by 2041; and

(b) support the Council's own ambition to reduce all casualty types (KSIs and 'slight' injuries) with specific attention to vulnerable road users, including motor cyclists.

6.3 The Mayor of London, through Transport for London (TfL), has set out his strategic approach to Vision Zero in London[2].

6.4 The Council has used the same strategic approach used by TfL and applied it in a local context and, using external expertise, has undertaken robust analysis of collision data to inform its Action Plan.

6.5 This report confirms Haringey's support for the Mayor of London's Vision Zero ambition and sets out, at a high level, the actions proposed to be taken (Appendix 1) towards achieving that target. This then provides direction for investment in appropriate interventions (the Investment Plan for 2022/23, as set out in Appendix 2).

6.6 Whilst recognising that achieving Vision Zero requires partnership working, the scope of the Action Plan mostly focuses upon those streets where the Council is responsible for road danger reduction. The Council will work with TfL, in its role as highway and traffic authority for the Transport for London Road Network (TLRN), to ensure that a consistent approach towards road danger reduction is applied.

7 The Vision Zero Strategy

7.1 The goal of Vision Zero is that, by 2041, all deaths and serious injuries will be eliminated from London's transport network.

7.2 The Vision Zero Strategy has been set by The Mayor of London, Transport for London and the Metropolitan Police. However, the responsibility for its success is shared by all, including those who have a role in designing, building, operating and managing the transport network as well as everyone that uses it.

7.3 In the past, casualty reduction and road safety schemes have typically been led by analysis of historic collision and casualty data. Through applying the Vision Zero Strategy at a local level, the Council will be going further with a more proactive and holistic approach to reducing road danger.

7.4 The Vision Zero Strategy uses a Safe System approach[3]. 'Safe System' is the generic term for approaches such as 'Vision Zero', 'Sustainable Safety' and 'Towards Safety'. It is considered best practice in road safety, according to the World Health Organisation (WHO) and the Organisation of Economic Cooperation and Development (OECD). The Safe System approach accepts that humans make mistakes but also recognises death and serious injury does not need to be an inevitable price to pay for mobility. It is based on the following principles:

[2] https://tfl.gov.uk/corporate/safety-and-security/road-safety/vision-zero-for-london
[3] https://www.rospa.com/media/documents/road-safety/factsheets/safe-system-factsheet.pdf

a) Road users are human, and they will make mistakes that can lead to collisions, so the Safe System needs to allow for human error.

b) The force of impact that the human body can tolerate is limited.

c) There is a shared responsibility between the people who design, build, maintain and use the road network, to prevent death and serious injury.

d) All parts of the road system should be made safe, rather than waiting for injuries to occur and then reacting. All parts of the system must be strengthened to multiply the protective effects so that if one part of the road system fails, road users are still protected. These principles require a forgiving road system that caters for the safety needs of all users.

7.5 To this end, Haringey Council's Road Danger Reduction Action Plan should centre on the Vision Zero Strategy's four core themes, applied in a Haringey context:

a) **Safe Speeds**: lowering traffic speeds reduces the likelihood collisions and severity of injuries and encourages people to walk or cycle and improves air quality.

b) **Safe Streets**: designing an environment that is forgiving of mistakes by transforming streets and ensuring that safety is at the forefront of all designed schemes

c) **Safe Vehicles**: ensuring vehicles using local roads are designed and operated as safely as possible

d) **Safe Behaviour**: encouraging everyone using local streets to travel safely and be aware of other road users' needs.

7.6 These themes will be supported by **monitoring**, i.e. measuring the success of the actions at regular intervals to ensure the objectives are achieved. The Investment Plan identifies specific funding for monitoring which will be reported as a component of future investment plans. It is noted that trends in collisions typically need 2-3 years of data (i.e. following the completion of a project) before conclusions can be fully drawn.

8 Data

Collision and casualty data and its limitations

8.1 Collision data in London is collected by the Metropolitan Police Service (MPS) and the City of London Police (CoLP) or reported to the police by members of the public. This data is provided to Transport for London (TfL) who process the collision data to provide it in the required standard to the Department for Transport (DfT) as a national statistic, known as STATS19.

8.2 Appendix 4 provides a set of frequently asked questions about collision and casualty data, as provided by Transport for London. Collisions may result in

multiple persons sustaining injuries and, consequently, casualty data will be higher than collision figures.

8.3 It is important to note that there are some limitations in this data, notably:

- Damage-only collisions that do not result in personal injury are also excluded from these statistics
- There is no obligation for people to report all personal injury collisions to the police (although there is an obligation under certain conditions, as outlined in Section 170 of the Road Traffic Act 1988).
- Due to the time required for processing and checking, there is a lag in the data of approximately six months.
- Post-2016 data is not directly comparable with previous years, due to a change in reporting methods

8.4 Beyond the data, the Council has an ongoing liaison arrangement with the MPS Road Safety Engineering Unit. Officers are informed of and will discuss all fatal and serious collisions. Where appropriate, joint site visits are undertaken which can lead to recommendations by the MPS to the Council where highway changes may need rectifying, such as improvements to the condition or layout of the road.

Collision and casualty trends

8.5 Despite tremendous steps having been made to reduce the number of fatalities and serious injuries on Haringey's roads, the statistics in Figure 1 below indicate there is still much more to do.

	2017	2018	2019	2020*
Fatal	1	2	2	1
Serious	112	84	77	52
Slight	869	699	690	581
Total	**982**	**785**	**769**	**634**

Figure 1 – Casualties on Haringey's public highway

8.6 *Finalised data is available for 2020 (in Figure 1 above) but this has not been included in the analysis of collision and casualty trends in this report due to the impact of Covid-19 restrictions on traffic movements. The 2020 finalised data is therefore not considered to be comparable with pre-Covid data.

8.7 'Casualties in Greater London during 2020' notes that *"the period since March 2020 saw reduced travel, especially during lockdown periods, and a corresponding reduction in road casualties. This is likely to be a temporary reduction with a return to the previous pre-pandemic downwards trend in casualties as London recovers from the pandemic. In terms of travel behaviour, the pandemic did result in fewer public transport journeys and an increase in personal transport modes."*

8.8 Overall, casualty rates in Haringey have seen a steady reduction between 2017 and 2019. As shown in Figure 2 there has been a:

- 30% reduction in those killed or seriously injured (KSI)

- 21% reduction in slight injuries

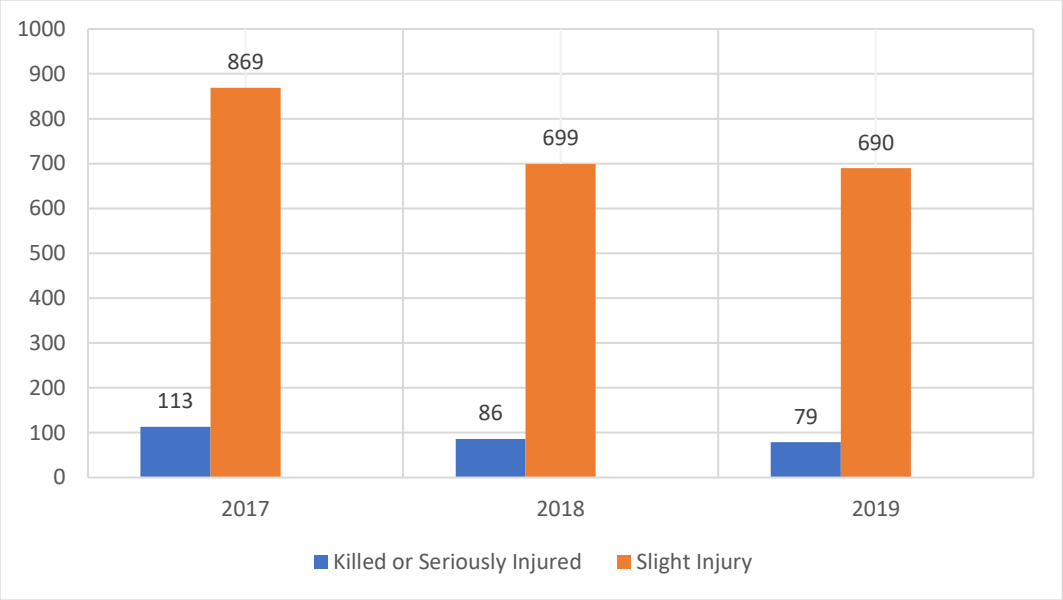


Figure 2 – Casualties on Haringey's public highway, grouped by killed or seriously injured (KSI) and slight injury

8.9 Appendix 5 provides more detail of casualty and collision trends in Haringey, Transport for London Road Network (TLRN)[4] and London-wide. Those figures indicate that, compared to London, Haringey has seen a greater reduction in KSIs, slight collisions and casualties, suggesting better performance with its road danger reduction approach than London as a whole.

8.18 Appendix 6 contains geographic details for collisions of all road users:

- Haringey casualty map (2017-2019)
- Map and table of 30 most dangerous[5] junctions (nodes)
- Map and table of 30 most dangerous[6] corridors (links)

Vulnerable road users

8.19 Over three quarters of casualties on Haringey's roads between 2017 and 2019 were vulnerable road users:

- pedestrians
- cyclists
- powered-two-wheelers (P2W) (motorcycles and scooters)

8.20 Vulnerable road users are at considerably greater danger of being killed or sustaining serious injuries than people in cars. Vulnerable road users also form a significant proportion of fatal and serious injuries.

[4] Commonly referred to as the 'Red Route' these are streets where Transport for London is responsible as the highway and traffic authority
[5] and [7] as ranked by number of casualties

8.21 Figure 3 shows the proportion of vulnerable casualties sustaining KSIs between 2017 and 2019 on borough roads. Typically, around 75% of these vulnerable casualties occur at junctions. This clarifies that pedestrians are the most vulnerable of road users, followed by powered-two-wheelers.

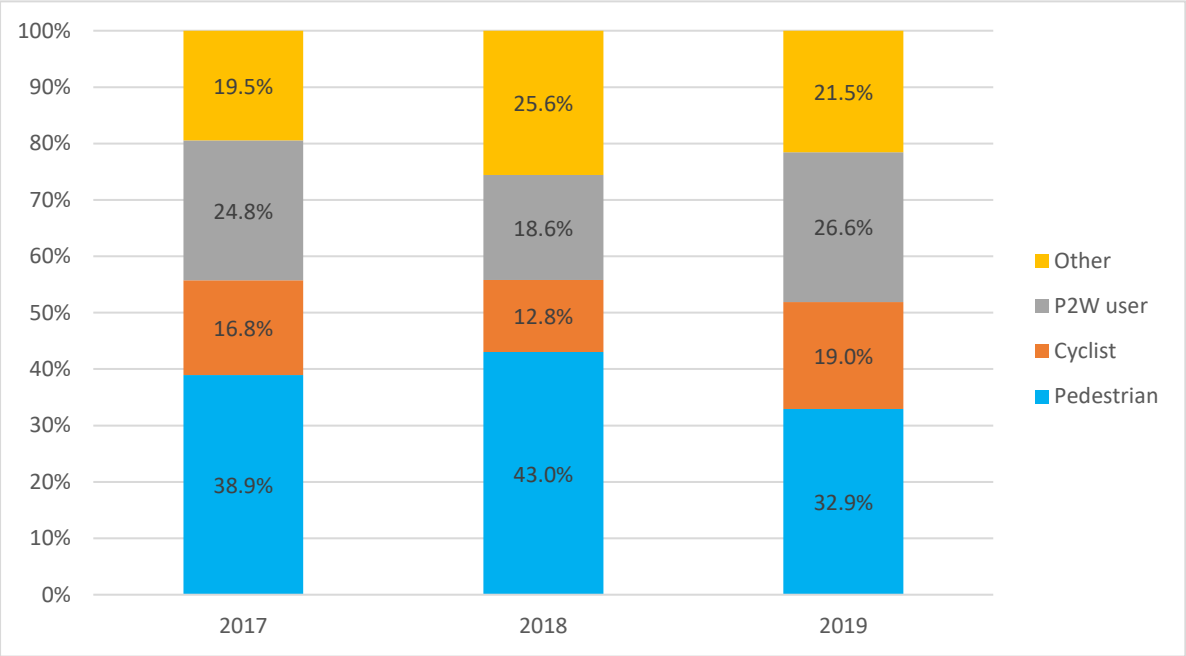


Figure 3 – Proportion of vulnerable casualties (Haringey public highway)

8.22 Focusing on providing better facilities and measures for these road users, in the form of improved routes and crossing facilities, reduced vehicle speeds, and better training is likely to lead to significant reductions in casualties for these groups and will be critical to achieving Vision Zero in Haringey.

8.23 The reduction of danger, making vulnerable road users' journeys safer, particularly for pedestrians and cyclists, will encourage more people to choose active travel options leading to:

- improved health,
- better air quality and
- meet the draft Walking and Cycling Action Plan vision to make "walking and cycling the natural choice" by 2031[7]

8.24 Appendix 7 contains geographic details of collisions involving vulnerable road users:

- 30 most dangerous junctions[8] (maps and table) for:
  - pedestrians
  - cyclists
  - motorcyclists

- 30 most dangerous corridors[9] (maps and table) for:

[7] Draft Walking and Cycling Action Plan
[8] and [10] as ranked by the number of casualties

- pedestrians
- cyclists
- motorcyclists

Speed-related collisions

8.25 The speed at which a vehicle travels is a major factor in the level of danger it poses to other road users and the occupants themselves.

8.26 Speed significantly increases the chance of severe injury or death in a collision, especially when the collision involves a vulnerable road user. The Royal Society for Prevention of Accidents reports that there is a 1.5% chance of being fatally injured in a 20mph collision versus an 8% chance at 30mph.

8.27 Figure 4 shows the number of casualties recorded based on the prevailing speed limit of the road.

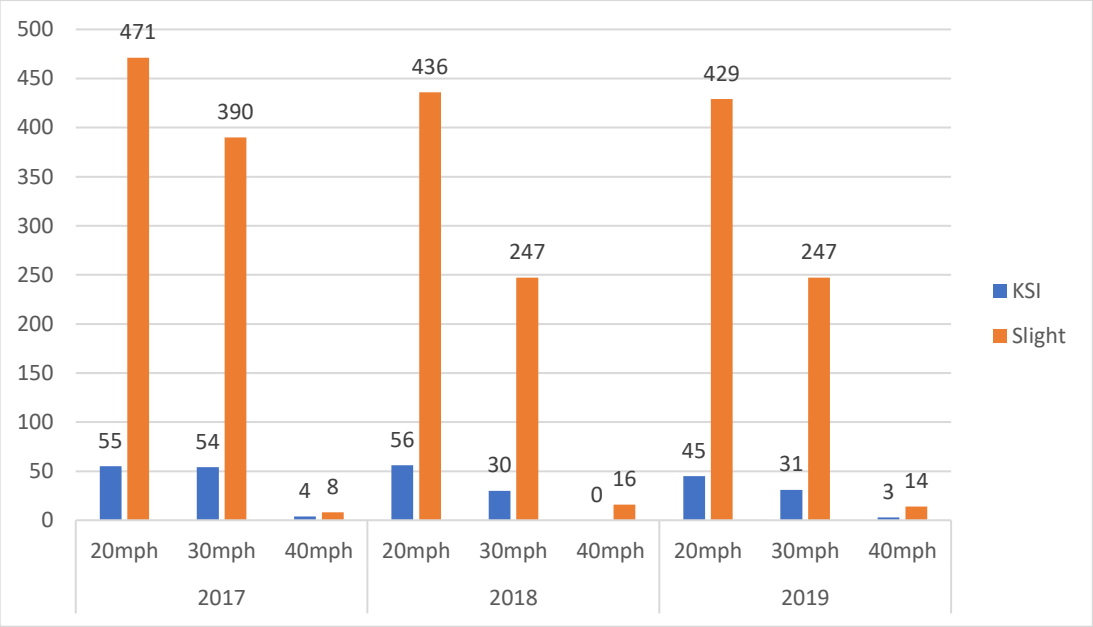


Figure 4 - Casualties based on speed limit

8.28 The majority of roads in Haringey are 20mph now, following the introduction of a borough-wide 20mph speed limit. However, there are still some parts of the borough road network which are either 30mph or 40mph. The streets currently excluded from the 20mph limit are mapped in Appendix 8[10].

8.29 Figure 4 indicates that, although those roads with 30 and 40mph speed limits only cover a very small part of Haringey's road network, they account for a large proportion of the KSI and slight injury casualties. These figures may need amending following further analysis in relation to the correct speed assignment noted above.

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[10] Some roads in TfL's collision data are listed as a speed limit of 30mph although they are not on the list of roads in Appendix 8. This may be a fault at the recording stage by police or persons reporting the collision not recognising the 20mph limit. Further review is required to confirm.

8.30 TfL has recently reduced the speed limit on the A10 Great Cambridge Road (between White Hart Lane and the Great Cambridge Roundabout) from 40mph to 30mph. It is noted that TfL is proposing to reduce the speed limit to 20mph on sections of the TLRN within Haringey (i.e. part of the A10 High Road and Bruce Grove and the A503 Monument Way).

8.31 The Council's intention (as set out in the Investment Plan) is to reduce the speed limit to 20mph on all borough roads in Haringey not currently ascribed that speed limit.

Most dangerous junctions and corridors

8.32 The top 10 most dangerous road junctions and corridors are listed in the two tables below. Further details, including maps and the severity of the collisions are provided in Appendix 9 and 10 respectively.

Junction location	Pedestrian Casualties	Cyclist Casualties	Powered 2-Wheeler Casualties	Total (vulnerable road user) casualties at junctions (nodes)
High Road (N22)/Lordship Lane	20		3	23
Green Lane/St Anns Road	9	4	3	16
High Road (N22)/Turnpike Lane	8	4	3	15
Green Lanes/Colina Road (Ats)	2	3	7	12
Endymion Road / Green Lanes	3	6	1	10
High Road (N17)/Dowsett Road	4	1	4	9
Lordship Lane/The Roundway (West)	4	1	4	9
High Road (N17)/White Hart Lane	6		2	8
Colney Hatch Lane/Alexandra Park Rd	2	2	3	7
Muswell Hill Rd/Cranley Gdns	1	2	4	7
TOTALS	**59**	**19**	**34**	**112**

Corridor Location	Pedestrian Casualties	Cyclist Casualties	Powered 2-Wheeler Casualties	Total (vulnerable road user) casualties along corridors (links)
Green Lanes	17	14	24	55
High Road N22	7	12	8	27
West Green Rd	10	5	10	25
High Road N22	13	6	1	20
High Road N17	7	4	8	19
Bounds Green Rd	6	7	5	18
Wightman Rd	4	6	7	17

High Road N17	**6**	**5**	**5**	16
Westbury Ave	**4**	**3**	**9**	16
Green Lanes	**3**	**4**	**9**	16
TOTALS	**77**	**66**	**86**	**229**

8.33 Further analysis of the data will be carried out as part of any road danger reduction project to identify the potential safety issues and to determine ways to mitigate them.

8.34 Figure 5 shows the number and severity of casualties at existing controlled crossing facilities where pedestrians or cyclists sustain injuries. Cycles are included in the event that the crossing has cycle facilities such as a toucan or parallel crossing. It is noted that these statistics also include collisions that take place within 50 metres of a crossing.

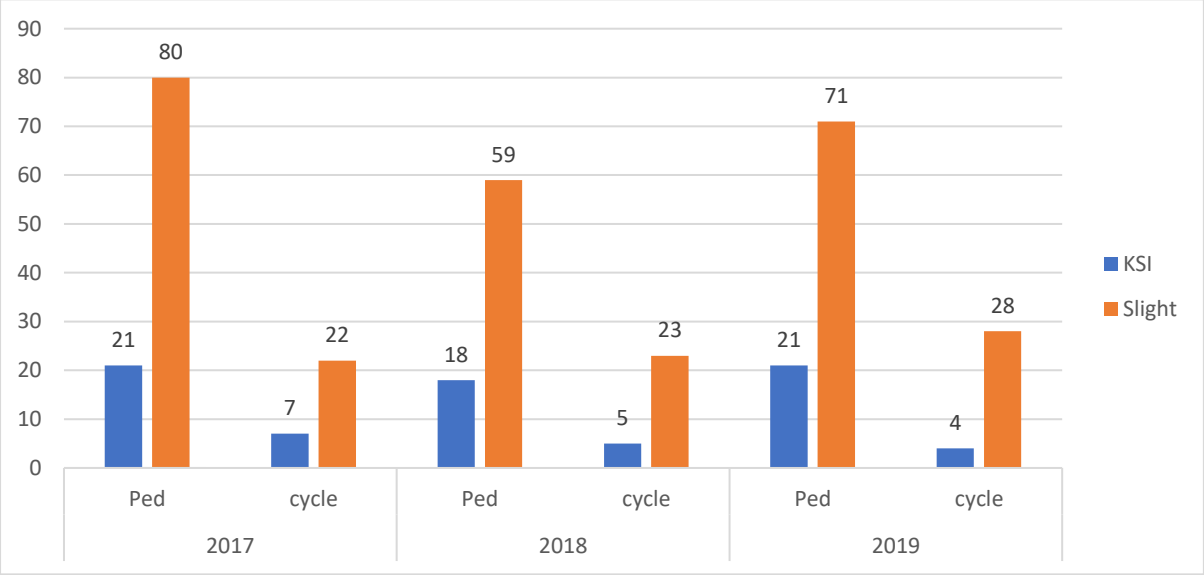


Figure 5 - Pedestrian and cycle casualties at controlled crossing facilities

Collision contributory factors

8.35 Since 2005, police forces in Great Britain have recorded factors which contributed to a collision as an integral part of the collision data collection process (STATS19). The contributory factors system was developed to provide some insight into why and how road accidents occurred and help investigation of how accidents might be prevented.

8.36 The range of contributory factors available allows for details regarding the road environment (e.g., whether the road surface includes any defects such as potholes or cracks, was slippery due to weather conditions etc.), vehicle defects (e.g. were tyres, brakes or steering defective etc.), injudicious action by the driver / rider (e.g. ignoring traffic signals, give way/stop lines, poor manoeuvre etc) to be recorded.

8.37 Research shows that almost three quarters of fatal and serious injury collisions in London occur at junctions which are particularly dangerous for cyclists and motorcyclists.

8.38 With regard to vehicle speed, details of exceeding the speed limit, travelling too fast for conditions and so on can also be recorded. Up to six contributory factors can be recorded and more than one can be recorded for each vehicle / casualty.

8.39 With the introduction of 'self-reporting' online in 2016, contributory factors are not collected in these cases - this leads to gaps in the data. Over the three-year period being considered (2017 to 2019), there were 2,073 collisions recorded in total in Haringey (covering all means of reporting) and, of these, 1,452 (70%) include contributory factors.

8.40 The following list ranks the top 10 contributory factors for collisions across the borough, including the number and percentage of collisions that resulted from these factors over the 3-year period.

Code	Description	Quantity (2017-2019)	Percentage
405	Failed to look properly	654	45%
403	Poor turn or manoeuvre	223	15%
602	Careless, reckless or in a hurry	179	12%
802	Failed to look properly (pedestrian)	175	12%
306	Exceeding speed limit	92	6%
103	Poor or defective road surface	68	5%
601	Aggressive driving	68	5%
701	Stationary or parked vehicle(s) obscured view	63	4%
307	Travelling too fast for conditions	57	4%
404	Failed to signal or misleading signal	55	4%

8.41 Three of the most common factors relate to the vehicle speed (codes 602, 306 and 307) and comprise 22.5% of collisions where contributory factors have been assigned. Some of these may be avoided through better signing and enforcement of speed limits and also driver training.

8.42 'Failed to look' and 'poor turn or manoeuvre' together account for some 60% of collisions. These would disproportionately impact upon vulnerable road users.

Complaints about speeding

8.43 Residents often report concerns about speeding vehicles which they witness where they live, on journeys to school or work etc. and report these to the Council via a variety of channels.

8.44 109 complaints concerning speeding, received between January to September 2021, were compared to historic traffic counts collected from around the borough over recent years. 47 of the complaints matched the location of traffic counts.

8.45 In several instances where the speed limit is 20mph, the 85th percentile speed[11] was around 30mph while the mean speed was around 24mph. This highlights the issue of using mean speed, as defined in DfT's guidance on setting local speed limits, to determine whether physical measures are necessary.

8.46 Following monitoring, the Council introduced physical measures in order to reduce vehicle speeds in some streets.

8.47 Examples of roads where both the mean (exceeds 24mph) and 85th percentile (around 30mph) are high are:

- Colney Hatch Lane
- Cranley Gardens
- Durnsford Road and
- Shepherds Hill

8.48 However, there are still some streets where complaints are made about speeding and (where data is held, such as those streets in the above list) this indicates that the complaints are valid and identifies that further action is required to bring speeds down.

8.49 The Council has – and will continue to – lobby the Department for Transport to enable local authorities to enforce speed limits on their roads, as responsibility currently solely sites with the police at the moment.

Enforcement - Moving Traffic

8.50 The enforcement of Moving traffic contraventions was decriminalised a number of years ago. The Council adopted those powers and implemented a network of CCTV cameras to enforce restrictions such as banned turns and yellow box junctions. This has achieved high compliance levels in areas allowing those cameras to be moved to non-compliant streets.

8.51 The most recent development in this area is the enforcement of HGVs rat running through (HGV) restricted streets. This enforcement is also undertaken by CCTV camera and enforcement cameras are installed at several locations.

8.52 The Council will continue to invest in and manage this operation increasing compliance and reducing risk associated with those contraventions.

9 Action Plan

9.1 Having considered the Safe System approach of the Vision Zero Strategy (Section 7) and the empirical evidence of collision and casualty data (Section 8), a proposed Road Danger Reduction Action Plan is provided in Appendix 1 and summarised below.

	Number	Action
Safe Spe	1	Develop borough-wide speed survey database

[11] The 85th percentile speed is defined as, "the speed at or below which 85 percent of all vehicles are observed to travel under free-flowing conditions past a monitored point.".

	2	Speed limit review
	3	Undertake stakeholder survey on speed issues
Safe Streets	4	Safe junctions (nodes) programme
	5	Safe corridors (links) programme
	6	Safe crossings programme
Safe Vehicles	7	Incorporating Intelligent Speed Assistance (ISA) into Council fleet vehicles
	8	Consider making adoption of ISA a requirement of procurement by service providers to the Council
	9	Lobby TfL to extend ISA to taxis and PHVs
	10	Incorporating dashcams into the Council's vehicle fleet
	11	Seek Fleet Operator Recognition Scheme (FORS) Gold Standard accreditation
	12	Make FORS accreditation a requirement of procurement by service providers to the Council
Safe Behaviours	13	Engage with stakeholders on this plan
	14	Enhanced communication strategy for road danger reduction messages
	15	STARS Programme
	16	Review of road safety education provision
	17	Powered-two-wheelers (PTW) safety study including the potential to allow motorcycles in bus lanes
	18	Behaviour change programme

9.2 This Road Danger Reduction Action Plan should be considered as a live document that will be subject to review and change as a consequence of, for example:

- delivery of actions within the Road Danger Reduction Action Plan (and, by inference, the Investment Plan for any year, not just 2022/23)
- changes to collision trends
- engagement / public feedback

9.3 The Road Danger Reduction Action Plan identifies actions that are already being progressed as well as proposed future actions that are subject to approval of funding.

Investment Plan

9.4 Appendix 2 of this report sets out which projects from the Road Danger Reduction Action Plan are proposed for funding in 2022/23.

9.5 Highlights of this investment – funded from TfL[12] and Council capital - include extension of 20mph speed limits (£450k), funding for new zebra crossings to address collision history (£400k), behaviour change programme (£250k), speed reduction measures (250k), safer junctions programme (200k) and safer corridors programme (200k).

9.6 On 1st March 2022, Council agreed to allocate £1.6m in new capital growth for road casualty reduction projects in 2022/23.

9.7 In addition, the Council has submitted bids to Transport for London (TfL) via the Local Implementation Plan (LIP) Annual Spending Submission totalling £1.55m for Vision Zero-related projects to be delivered over the period 2022/23 to 2024/25. Of this £1.55m, £0.65m is sought for 2022/23.

9.8 It is important to note that the TfL funding has not yet been confirmed. So, should the full settlement not be received, then a full prioritisation process (that takes into consideration all projects listed in the Investment Plan) will be necessary.

9.9 It is also important to note that, if the Road Danger Reduction Action Plan is agreed, then significant additional funding will be required beyond the scope of the current MTFS as well as greater certainty over TfL funding. Without this, the Council will not be able to meet the Vision Zero target.

9.10 Should the Council not be successful in generating the external funding 'in full or in part' then, as is the normal practice, the service will bid for the capital funds as part of next year's MTFS process.

10 Design, Consultation and Engagement

10.1 The Council is committed to ensuring that local communities are informed of Vision Zero improvements in their neighbourhoods. This will involve engaging with local residents, businesses and other key stakeholders in conjunction with utilising their local knowledge and experiences, as well as data-led evidence to deliver the most appropriate solutions to achieve Vision Zero.

10.2 The proposals identified within this report will be developed in accordance with national, regional, local standards and best practise.

10.3 The level of consultation / notification for projects is set out in Appendix 3.

10.4 The Council will continue to improve the quality of information available to residents and other interested parties on Vision Zero and other highways and transport projects planned for their areas. This will involve information being made readily available on the Council's website, as well as through works signing and advance warning to minimise disruption and inconvenience associated with works.

[12] Subject to funding confirmation by TfL

11 Contribution to strategic outcomes

11.1 Danger reduction supports two Themes within the Borough Plan 2019-2023.

(a) People Theme: A Haringey where strong families, strong networks and strong communities nurture all residents to live well and achieve their potential. Vision Zero will contribute to specific outcomes within this Theme, by reducing road danger.

(b) Place Theme: A place with strong, resilient & connected communities where people can lead active and healthy lives in an environment that is safe, clean and green. Vision Zero will contribute to specific outcomes within this Theme, by improving the public realm and road network, eliminating road traffic collisions, while improving accessibility for all road users.

11.2 London-wide contribution to a healthier London – the proposals in this report will support delivery of The Mayor of London's Transport Strategy, Local Implementation Plan 3 and Vision Zero Action Plan.

11.3 The Council's Local Plan - Haringey's Local Plan sets out the Council's key planning policies, which include a focus on sustainable transport to be delivered. The delivery of Vision Zero projects will help address climate change by encouraging active travel.

11.4 Transport Strategy - the Council's Transport Strategy sets out the strategic vision, objectives, and priorities on the future of transport in Haringey over the next 10 years. The strategy identifies the need for an action plan to target road danger reduction. It also outlines how the priorities in the Haringey Borough Plan will be achieved and the role that road danger reduction projects play in achieving this.

11.5 Haringey's Climate Change Action Plan – which sets out how the borough will become net zero carbon by 2041. Reduced road danger will encourage active travel and therefore a reduced reliance upon motor vehicles. In turn, this will reduce energy consumption and carbon emissions.

11.6 Haringey's Walking and Cycling Action Plan – which sets out how the Council will deliver its aspirations and enable more walking and cycling in the borough. This plan relies upon reducing road danger.

12 Statutory Officers' comments (Director of Finance (procurement), Head of Legal and Governance, Equalities)

Finance

12.1 This report sets out the proposed expenditure for the Road Danger Reduction Action Plan for the forthcoming year. The approved capital programme agreed by Council at its budget setting meeting of the 1st March 2021 allocated £5.1m of

strategic community infrastructure levy to the Streetspace Plan. This report proposes utilising £0.2m of that funding. Council, at its budget setting meeting of 1st March 2022, considered the overall General Fund capital programme for 2022/23. The proposed capital programme included a budget proposal of £1.6m for Road Casualty Reduction which is proposed to be used to support the investment in the Road Danger Reduction Action Plan. Future years funding for this budget beyond 2022/23 is subject to the successful generation of external funding.

12.2 The report also identifies potential TfL funding of £1.08m towards capital schemes. Should the TfL bids not be successful or successful in part then a review of the overall programme will be undertaken to reprioritise schemes within the overall budget.

12.3 The report does not identify any revenue consequence of this investment. Should a revenue requirement arise this will need to be contained within existing resources.

Legal

12.4 The Head of Legal & Governance has been consulted on the preparation of this report and comments as follows.

12.5 The Council, as the traffic authority for the borough, has a statutory duty under section 39 of the 1988 Road Traffic Act to “prepare and carry out a programme of measures designed to promote road safety”

12.6 This report seeks approval of the Road Danger Reduction and Investment Plan for 2022/23 financial year to ensure it complies with its statutory duties under the Road Traffic Act 1988.

12.7 The Head of Legal Services and Governance confirms that what is being proposed and recommended within this report is in accordance with the law as referred to within this report, and the proposals can be lawfully implemented by the Council.

Procurement

12.8 N/A

Equality

12.9 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.

12.10 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.

12.11 An Equalities Impact Assessment (EqIA) formed part of the statutory consultation process in 2018/19 which informed the development of the Local Implementation Plan 3 (LIP). The LIP sets out the objectives, delivery plans and monitoring arrangements for all transport scheme proposals including that of road safety works.

12.12 The EqIA identified several disproportionate impacts that may occur on equalities groups because of the implementation of highways works associated with the LIP and the Council's transport schemes.

12.13 The key beneficial impacts relate to:

- Improved access to facilities will benefit all Haringey residents and visitors, but some protected groups such as older people and children will benefit disproportionately.

- Safer roads, less congestion and reduced levels of pollution are likely to benefit people in some of the protected groups, such as older and/or disabled people with respiratory illnesses more than for the general population.

12.14 Furthermore, people from more deprived areas, some ethnic minorities, disabled people, children and older people experience the worst impacts of road danger, noise and air pollution. Main roads pass through some of the most deprived communities, creating environments that are not inclusive to all, with roads that are intimidating and difficult to cross.

12.15 People walking in the most deprived areas of London are more than twice as likely to be injured as those in the least deprived areas.

12.16 People aged between 20 and 29 years old are more likely to be killed or seriously injured than other age groups and the number of children killed or seriously injured in cars increased in 2016.

12.17 Black, Asian and minority ethnic Londoners are more at risk, with children in this group being on average 1.5 times as likely to be killed or seriously injured on the roads than non- Black, Asian and minority ethnic children.

12.18 Groups who may have greater reliance on travel by car (e.g. people with disabilities; parents with childcare commitments; people in transport poverty) may be affected adversely in comparison to other groups who are better able

to use public transport or travel actively. Schemes will be individually planned and delivered in such a way as to minimise any negative impacts that may arise.

12.19 Measures that increase active travel through improved safety and awareness aim to improve the health and wellbeing of groups with protected characteristics who are known to experience health inequalities.

12.20 The communication and engagement measures for works in the Action Plan will increase awareness of works and minimise disruption caused. This will allow residents adequate time to make alternative arrangements, and any necessary adjustments will be made on a scheme-by-scheme basis.

13 Use of Appendices

Appendix 1 – Road Danger Reduction Action Plan
Appendix 2 – Investment Plan 2022/23
Appendix 3 – Consultation methods
Appendix 4 – Collision data 'Frequently Asked Questions'
Appendix 5 – Casualty and collision trends in Haringey
Appendix 6 – Collision maps and tables (all road users)
Appendix 7 – Collison maps and tables (involving vulnerable road users)
Appendix 8 – Map of streets excluded from 20mph speed limit
Appendix 9 – Priority junctions
Appendix 10 – Priority corridors

14 Local Government (Access to Information) Act 1985

- Borough Plan 2019-2023
- Transport Strategy 2018
- Draft Walking and Cycling Action Plan
- Cabinet report 7/12/21: 2022-23 Budget and 2022-2027 Medium Term Financial Strategy Report
- Local Plan

Appendix 1 – Action Plan

Vision Zero theme: Safe Speeds			
Action no.	Action	Details	Progress / timeframe
1	**Develop borough-wide speed survey database** To effectively and efficiently address those streets where speeding is an issue, data will be collected to identify those with the highest speeds	To develop a robust database of traffic volume and speeds in Haringey, the Council will invest in a new network of traffic count sites and make use of latest technology to make data collection as efficient as possible. This will allow it to continuously monitor traffic volume and speeds at specific locations across the borough aiding how future schemes will be prioritised	25 live monitoring stations are currently being installed, to be completed and be operational by the end of February 2022
		Traffic and speed surveys should be undertaken over a wide proportion of Haringey's road network to provide a robust evidence base on which to base intervention works	Commence in Spring 2022 and continue on an annual basis
2	**Speed limit review** A 20mph speed limit already exists on all but a small number of borough roads	Where speeds are found to be high, a range of measures will be implemented using a staged approach starting with simpler measures such as additional road markings and signs, to more engineering measures such as physical traffic calming features	Timeframe to deliver will depend on measures identified but are likely to be deliverable within the short-term
		Review speed limits on those roads which are not 20mph with the aim of converting them to 20mph	12-24 months
3	**Undertake stakeholder survey on speed issues**	Surveys of stakeholders will be undertaken to ascertain their views on speeds in the borough and how speeding issues can be addressed through a co-production approach	Expected to commence Autumn 2022

Appendix 1 – Action Plan

Vision Zero theme: Safe Streets			
Action no.	Action	Comments	Progress / timeframe
4	**Safe junctions (nodes) programme**	Identify those junctions (nodes) proving to be most dangerous for vulnerable road users.	Complete A list of top priority junctions are identified in Appendix 9
		Carry out engineering works to reduce danger/conflicts improving conditions for vulnerable road users.	Subject to further engagement For 2022/23 funding, see Appendix 2
		To keep junctions clear of parking and improve sight lines, restrict parking by providing 10m (minimum) of no waiting and no loading restrictions, in line with Rule 243 of the Highway Code	12-24 months
5	**Safe corridors (links) programme**	Identify those corridors (links) proving to be most dangerous for vulnerable road users.	Complete A list of top priority corridors are identified in Appendix 10
		A series of programmes will be developed to identify improvements to routes to schools, stations and shopping areas for vulnerable road users to enhance our existing network and improve road safety	Subject to further engagement and approval of funding. For 2022/23 funding, see Appendix 2
6	**Safe crossings programme**	Existing crossings to be reviewed to identify if safety improvements need to be made	24-36 months, subject to future funding
		Provide new crossings to address safety concerns raised	12 months

Appendix 1 – Action Plan

Vision Zero theme: Safe Vehicles			
Action no.	Action	Comments	Progress / timeframe
7	**Incorporating Intelligent Speed Assistance (ISA) into Council fleet vehicles**	ISA will be considered – in conjunction with relevant service areas - for all new Council fleet vehicles to assist in driving at appropriate speeds. The Council's vehicle fleet will be reviewed to reflect this consideration.	6-12 months
8	**Consider making adoption of ISA a requirement of procurement by service providers to the Council**	Subject to there being no adverse impact on local SMEs, consider all new relevant procurements to include a commitment from suppliers of Council services to adopt ISA in their fleet vehicles.	6-12 months
9	**Lobby TfL to extend ISA to taxis and PHVs**	Lobby TfL to extend the use of ISA to taxis and PHVs as a licensing requirement	6-12 months
10	**Incorporating dashcams into the Council's vehicle fleet**	Evaluate the incorporation of dashcams into the Council's road-going vehicle fleet; collected footage can identify any driver training needs. Instances of dangerous driving behaviour from motorists will be referred to the police as appropriate.	6-12 months
11	**Seek Fleet Operator Recognition Scheme (FORS) Gold Standard accreditation**	As part of the revised fleet management practices and processes being instigated, investigate undertaking the necessary steps to achieve FORS accreditation at Gold Standard to improve driving standards of Council vehicle drivers.	6-12 months
12	**Make FORS accreditation a requirement of procurement by service providers to the Council**	Evaluate the requirement for all new relevant procurement processes to require suppliers of Council services to hold FORS accreditation.	6-12 months

Appendix 1 – Action Plan

Vision Zero theme: Safe Behaviours			
Action no.	Action	Comments	Progress / timeframe
13	**Engage with stakeholders on this plan**	Stakeholder engagement will take place on this Action Plan to help shape future investment. Also see Action 3.	Autumn 2022
14	**Enhanced communication strategy for road danger reduction messages**	Enhance the frequency and content of road danger reduction messages on Council website homepage along with pop-up messages and via other forums / media. Include publicity messages and articles on road danger reduction in Haringey People magazine and other local publications.	6-12 months
15	**STARS -** Sustainable Travel: Active, Responsible, Safe	Identify additional resources to enable engagement with local schools to achieve STARS accreditation and increase the number of schools with Bronze, Silver and Gold accreditation.	Ongoing
16	**Review of road safety education provision**	Undertake a review of the Council's road safety education and cycle training programmes and invest in additional resources to expand these	12 months
17	**Powered two wheelers (PTW) safety study (including the potential to allow motorcycles in bus lanes)**	A study will be carried out to investigate collision data for PTW and, through engagement, the issues specific to this vulnerable road user group. This will include assessing the impact of allowing them to drive in bus lanes and consultation with existing permitted bus lane users.	18 months
18	**Behaviour change programme**	Covering school travel planning, road safety initiatives and events.	12 months

Appendix 2 – Investment Plan

As noted in paragraphs 9.4 to 9.8, this report proposes how to spend the capital investment of £1.6m. TfL funding has been sought however this is unconfirmed and the delivery of projects is subject to the outcome of assessments. Should this TfL funding be unsuccessful then those projects would be funded from Council capital and SCIL following a reprioritisation exercise.

	Project	TfL funding bid 2022/23 (TBC) (FOR INFO ONLY)	Capital Investment 2022/23 (PROPOSED)	SCIL (PROPOSED)	Road Danger Reduction Action Plan theme / ID number
1	New zebra crossings at various collision hotspot locations across the borough, subject to assessment	£ 400,000			Safe Streets / 4
2	Ferme Park Road/ Tottenham Lane junction – engagement, feasibility and delivery of potential measures	£ 30,000	£50,000	£50,000	Safe Streets / 4 and 5
3	Ferme Park Road corridor safety study and delivery of potential measures		£50,000	£50,000	Safe Streets / 4 and 5
4	Lordship Lane safety study	£ 20,000			Safe Streets / 5
5	White Hart Lane/ High Road junction crossing	£ 150,000			Safe Streets / 4
6	Annual cycle training delivery	£ 180,000			Safe Behaviour/16
7	Delivery of the Council's behaviour change programme including school travel planning & road safety initiatives/events (e.g. play streets)	£ 250,000			Safe Behaviour/18
8	Powered two wheelers safety study	£ 50,000			Safe Behaviour/17
9	Comms and campaigns on the Action Plan		£ 20,000		Safe Behaviour/13
10	Borough wide traffic and speed survey and monitoring		£ 70,000	£ 40,000	Safe Streets/1
11	Extension of 20mph borough wide Conversion of 30mph and 40 mph roads to 20mph subject to assessment (see Appendix 8)		£ 450,000	£ 60,000	Safe Streets/2
12	Safe junction programme (includes junction corner protection): Locations subject to further assessment of the top priority junctions outlined in Appendix 9		£ 200,000		Safe Streets/5
13	Safe Corridor programme: Locations subject to further assessment of the top priority corridors outlined in Appendix 10		£ 200,000		Safe Streets/4
14	Assessment of controlled crossings with casualties		£ 100,000		Safe Streets/6
15	Additional crossings (subject to assessment): Park Road/Wolseley Rd junction Alexandra Park Rd/Talbot Rd Additional locations on request		£ 160,000		Safe Streets/6
16	Speed reduction measures to address perceived danger/complaints: Shelbourne Road – subject to assessment Roads where complaints have been received subject to outcome of new speed data and further assessment		£ 250,000		Safe Streets /2
17	Funding for resources for programme delivery (e.g. working with others on 'Safe Vehicles')		£ 50,000		
	Sum	£ 1.08m	£ 1.6m	£ 200,000	

Appendix 3 – Consultation methods

The various projects will be subject to further consultation / notification. The level of consultation / notification will depend on the impact of the scheme on the local community. The three consultation / notification types are:

- Notification of works – residents and businesses of affected roads will be notified by letter drop and any other appropriate media 3 weeks in advance of work commencing.

- Statutory notification **-** the public will be notified of the Council's intention regarding proposals through advertisements placed in the local press and on site, where applicable. Residents and businesses of the affected roads will also be notified by letter drop. The notification will provide full details of the scheme. Resident, businesses and other interested parties will have the opportunity to object to proposals and any objection will be considered before implementing a permanent traffic order.

- Full public consultation – high-profile schemes will be subject to full public consultation which will include consultation questionnaires and may include public meetings and other forms of engagement.

The table below sets out the consultation process by scheme type

Scheme Type	**Consultation Type**		
	Notification	Statutory	Public
Engineering projects		✓	✓ (depending on scale)
Road Danger Reduction Action and Investment Plan development	Whilst not a statutory requirement, as noted in the action plan further engagement will take place to shape future actions and investment		

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Collision Data Dashboard FAQs

December 2021

Where does the casualty data come from?
London collision data is collected by the Metropolitan Police Service (MPS) and the City of London Police (CoLP) or reported to the police by members of the public. This is provided to Transport for London (TfL) who 'process' the collision data to provide it in the required standard to the Department for Transport (DfT) as a national statistic, known as STATS19.

Why Is data only available for January 2017 onwards?
In November 2016 the Metropolitan Police Service (MPS) changed the way that they record collision information, to a system called COPA (Case Overview Preparation Application) and providing an online self-reporting system. This changed the injury severity from the officer's subjective decision to automatically assigned based on the casualty injury. The impact of this change to 'injury-based reporting' was to almost double the number of serious casualties reported (these would have previously been categorised as slight). Therefore, data post-November 2016 cannot be directly compared with pre-COPA data before November 2016 and thus would be misleading to include in a dashboard containing time series comparisons.

Why can't I see the most recent data?
More recent data than published here has not yet been finalised. Road traffic collision data remains provisional until the year for which it is finalised and closed, and records can be amended based on revised collision details and further investigation. For the most accurate statistics on traffic fatalities, please refer to the Transport for London (TfL) Road Safety Data pages, the Department for Transport (DfT) official statistics (updated annually), or Provisional Fatalities (updated monthly).

Whilst we work with the relevant police forces, the Metropolitan Police Service (MPS) and the City of London Police (CoLP), to get the data as quickly as possible there are several reasons why it would not be appropriate to share this as soon as we get it:

- TfL spends a lot of time and resource checking and processing collision reports to ensure that they are as accurate as possible and meet the DfT's STATS20 guidelines
- Police investigations relating to collisions can take time to complete and therefore each collision record is constantly being updated until it is closed
- The MPS undertake a 'Quality Assurance' exercise, checking all their reports to ensure that the severity of injuries matches DfT classifications. This normally occurs about three months after each collision has occurred and this needs to take place before TfL can fully process each collision record
- Collisions can be reported by members of the public up to six months after their occurrence.

- Injury severity is not confirmed until 30 days after the collision took place. If a person involved in a collision dies from their injuries within 30 days, then the injury severity is deemed 'fatal'.
- Collisions resulting in fatalities are subject to additional scrutiny and investigation that can take longer to report, especially if this involves a coroner's report

What is included in these statistics?
All collisions that were reported by the police and that occurred on a public highway involving at least one motor vehicle, horse rider or pedal cyclist, and where at least one person was injured are included. To meet the definition of a national statistic for road safety the collision record must meet the STATS19 criteria. Therefore, a record that has been submitted to the police may fail to meet the criteria for a national statistic and therefore may not be reported in national statistics. There is no obligation for people to report all personal injury collisions to the police (although there is an obligation under certain conditions, as outlined in Section 170 of the Road Traffic Act 1988). Collisions that happened on private land (including private drives) or car parks are not included in the statistics. Damage only collisions that do not result in personal injury are also excluded from these statistics.

What are the differences between a "serious" and "slight" injury/casualty?
Examples of 'serious' injury are: fracture, internal injury, severe cuts, crushing, burns (excluding friction burns), concussion, severe general shock requiring hospital treatment, detention in hospital as an in-patient, either immediately or later, injuries to casualties who die 30 or more days after the collisions from injuries sustained in that collision. Examples of 'slight' injury are sprains, not necessarily requiring medical treatment, neck whiplash injury, bruises, slight cuts, slight shock requiring roadside attention. Persons who are merely shaken and who have no other injury are not included unless they receive or appear to need medical treatment. Further information is available here.

What is the difference between collision figures reported by the Metropolitan Police Service (MPS) and the City of London Police (CoLP)?
The City of London Police (CoLP) force use a different software for collecting their collision data than the rest of London, which is covered by the Metropolitan Police Service (MPS). This software was developed by the Department of Transport (DfT) and does not differentiate between taxis and private hire vehicles but keeps them as one combined category of taxi. As set out in our Vision Zero action plan and progress report we are committed to promoting a culture of transparency internally and across operators, and publishing data wherever possible. We have worked with the MPS to split out taxi and private hire vehicles and this information, as reported by the police at the scene of a collision, can now be queried in the dashboard. Data sent to Transport for London (TfL) by the MPS and CoLP is validated to ensure that it meets DfT STATS20 guidance on the completion of collisions here. However, it is important to note that this information is subjective and may not always accurately capture the correct classification of vehicle types involved in collisions or whether a vehicle was being used as a taxi or

private hire vehicle at the time of the collision. We are working with the DfT to further enhance the STATS19 dataset as part of the DfT STATS19 review here.

I was involved in a collision; how do I find it?
A new search function has been added to the dashboard that allows you to type in a location and see the collisions that are listed there. However, the information we display relating to collisions is limited as we need to obey General Data Protection Regulation (GDPR) rules and ensure that no personally identifiable information is provided.

I was involved in a collision, but it is not showing in your dashboard, why?

- The online dashboard only includes collisions that were reported to the police (either by the police or by a member of the public either online or at a police station), and where one or more parties were injured as a result.
- The dashboard only shows collisions resulting in injury that took place between 1 Jan 2017 and the most recent validated data.
- In accordance with Department for Transport (DfT) STATS20 guidelines, only collisions that took place on the public highway (i.e. not on private property) and where the injuries were not the result of natural causes (i.e. medical episodes) are recorded. Suicides are not included in these figures.

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Appendix 5 – Collision and Casualty Trends

Collision and casualty data is primarily shown for those recorded on borough roads only in this analysis as Transport for London (TfL) are responsible for the collisions on their road network and implement measures to reduce them.

However, to give an indication of the proportion of collisions and casualties (as well as reflect those figures published by TfL on their road danger reduction dashboard) both are included on Table 3.1 and 3.2.

The figures show the number of collisions between 2017 and 2019 on Haringey's borough roads, those managed by TfL (TLRN) and the combined totals on both networks.

- Table 3.1 indicates figures for fatal, serious and slight injuries.
- Table 3.2 indicates similar figures but combines fatalities (killed) and serious injuries as 'killed and serious injuries' (KSI) which is typically used throughout the rest of the analysis.
- Table 3.3 shows the per cent changes over the period of collisions on borough roads only (i.e. excluding TLRN).

The graph in Fig 3.2 shows the KSI and slight figures on borough and TfL roads.

Overall, collision rates in Haringey have seen a steady reduction between 2017 and 2019 of 31.5% for KSI and 14.0% for slights. KSI collisions saw a steady reduction of between 21.3% and 12.9% over both years while slight collisions experienced a 13.6% reduction between 2017 and 2018 followed by a small decrease of 0.5% between 2018 and 2019.

	2017			2018			2019		
	Boro	TLRN	Total	Boro	TLRN	Total	Boro	TLRN	Total
Fatal	1	2	3	2	0	2	2	1	3
Serious	107	23	130	83	32	115	72	28	100
Slight	663	197	860	573	167	740	570	176	746
Total	771	222	993	658	199	857	644	205	849

Table 3.1: Collisions – Borough & TfL (TLRN) Roads

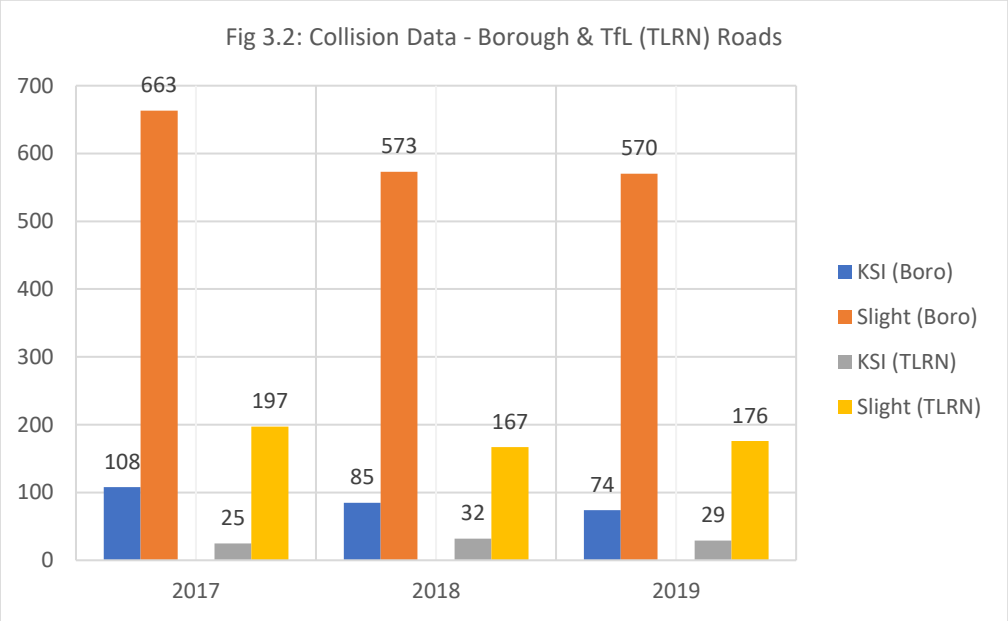
Appendix 5 – Collision and Casualty Trends

	2017			2018			2019		
	Boro	TLRN	Total	Boro	TLRN	Total	Boro	TLRN	Total
KSI	108	25	133	85	32	117	74	29	103
Slight	663	197	860	573	167	740	570	176	746
Total	771	222	993	658	199	857	644	205	849

Table 3.2: Collisions – Borough & TfL (TLRN) Roads (KSI & Slight))

	2017	2018	2019	% Change 2017 to 2018	% Change 2018 to 2019	% Change 2017 to 2019
KSI	108	85	74	-21.3%	-12.9%	-31.5%
Slight	663	573	570	-13.6%	-0.5%	-14.0%

Table 3.3: Collisions (Borough Roads) – Rate of Change



Invariably some collisions result in multiple persons sustaining injuries and consequently casualty data is higher than collision figures.

Table 3.4 shows the number of casualties arising from collisions on both borough roads and TLRN. Table 3.5 shows fatal and serious casualties consolidated as KSI figures. Table 3.6 shows the changes over the study period of casualties on borough roads (i.e., excluding TLRN). The resulting casualties saw an overall reduction in KSIs between 2017 and 2019 of 29.8% and 20.4% for slight collisions.

Appendix 5 – Collision and Casualty Trends

	2017			2018			2019		
	Boro	TLRN	Total	Boro	TLRN	Total	Boro	TLRN	Total
Fatal	1	2	3	2	0	2	2	1	3
Serious	112	23	135	84	32	116	77	30	107
Slight	869	258	1127	699	201	900	690	220	910
Total	982	283	1265	785	233	1018	769	251	1020

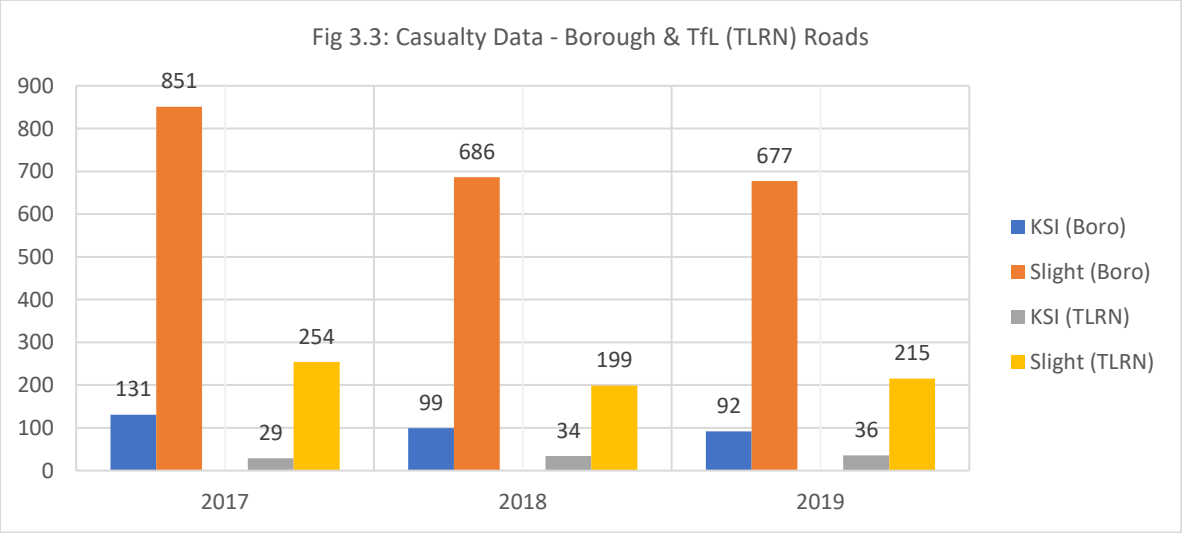
Table 3.4: Casualties – Borough & TfL (TLRN) Roads

	2017			2018			2019		
	Boro	TLRN	Total	Boro	TLRN	Total	Boro	TLRN	Total
KSI	131	29	160	99	34	133	92	36	128
Slight	851	254	1105	686	199	885	677	215	892
Total	982	283	1265	785	233	1018	769	251	1020

Table 3.5: Casualties – Borough & TfL (TLRN) Roads (KSI & Slight))

	2017	2018	2019	Change 2017 to 2018	Change 2018 to 2019	Change 2017 to 2019
KSI	131	99	92	-24.4%	-7.1%	-29.8%
Slight	851	686	677	-19.3%	-1.3%	-20.4%

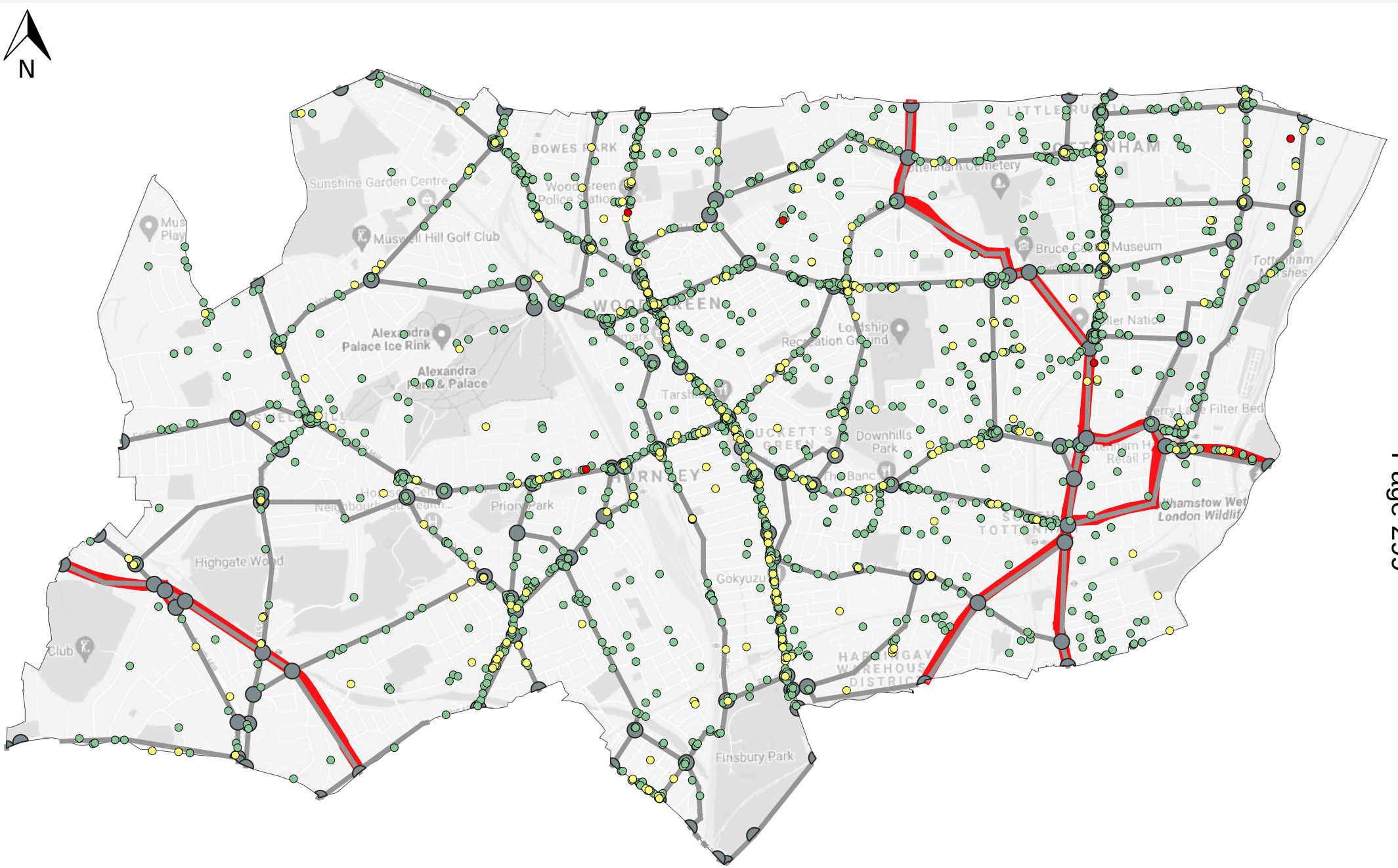
Table 3.6: Casualties (Borough Roads) – Rate of Change



London	2017	2018	2019	Change 2017 to 2018	Change 2018 to 2019	Change 2017 to 2019
Fatal	131	112	125			
Serious	3750	3953	3780			
Slight	28686	26526	26102	-8%	-2%	-9%
Total KSI	3881	4065	3905	+5%	-4%	-1%

Table 3.7: Casualties (London) – Rate of Change

These figures indicate that Haringey has seen a greater reduction in KSI and Slight collisions and casualties compared to London as a whole and suggests Haringey appears to be performing better than London as a whole with regards to their approach to road danger reduction.



London Borough of Haringey - Casualty Map

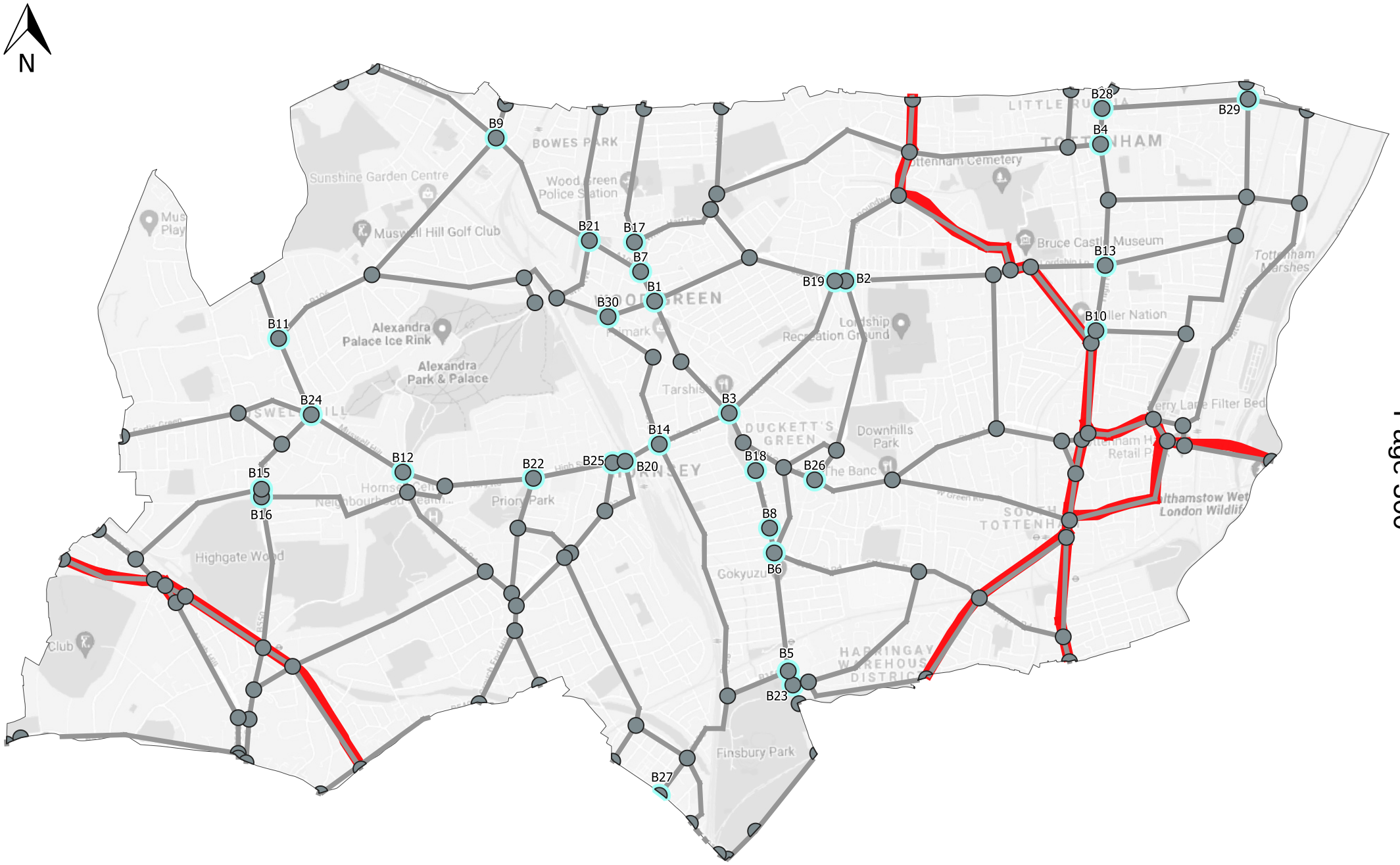
2017, 2018 and 2019 Data

All Road Users:

- Fatal
- Serious
- Slight

- Links and Nodes
- Red Route

Haringey LONDON



Top 30 Nodes Ranked on No of Collisions

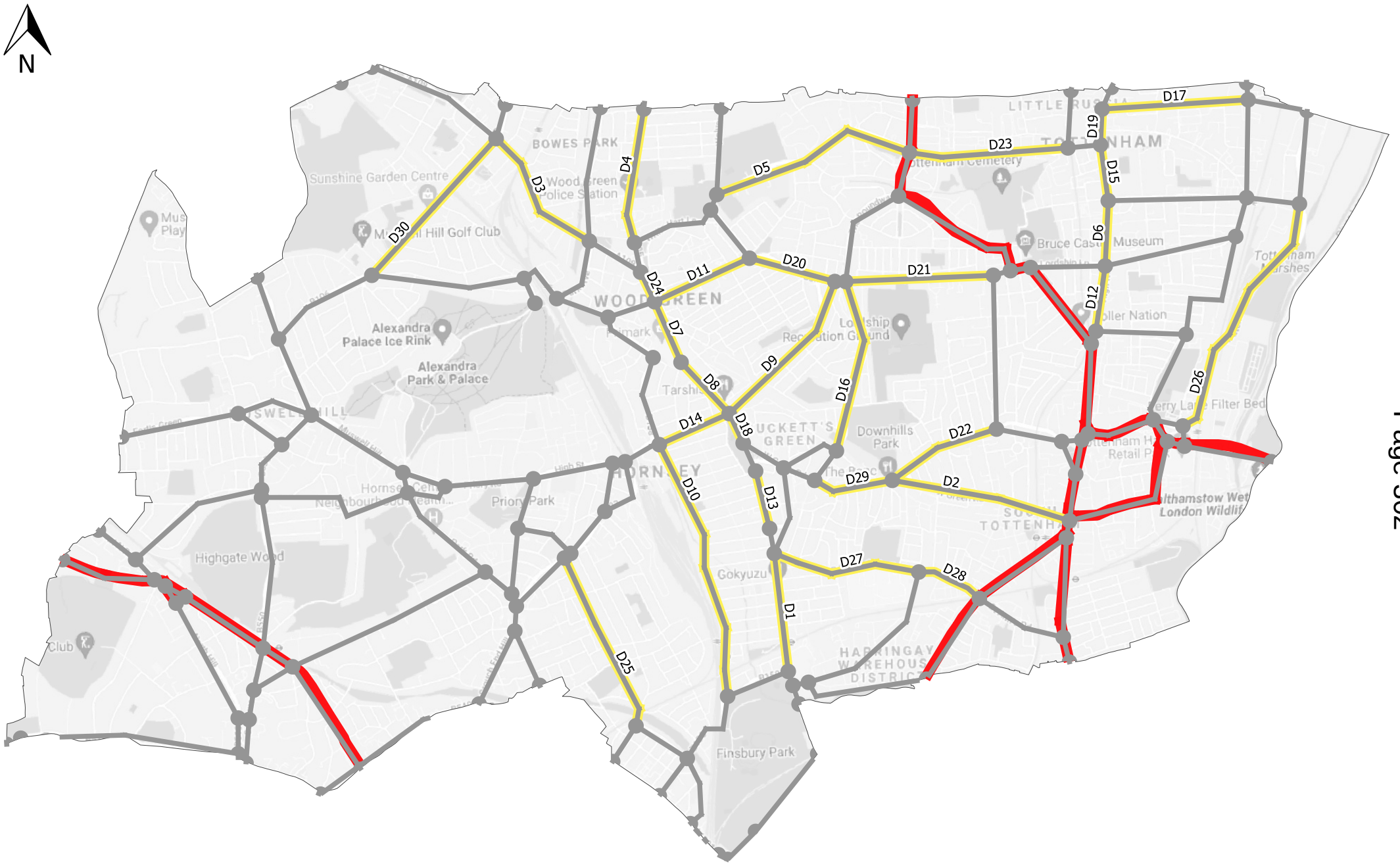
2017, 2018 and 2019 Data

Links and Nodes

Red Route

Haringey LONDON

JUNCTIONS (NODES) - All Road Users - 2017, 2018 and 2019 Data									
Top 30 Locations Ranked on No. of Collisions	Labels on the Collision Map	No of Collisions	Location	Fatal Casualties	Serious Casualties	Slight Casualties	2017 Casualties	2018 Casualties	2019 Casualties
1	**B1**	43	High Road (N22)/Lordship Lane	0	4	61	24	19	22
2	**B2**	24	Lordship Lane/The Roundway (West)	0	2	25	11	10	6
3	**B3**	23	High Road (N22)/Turnpike Lane	0	1	25	8	16	2
4	**B4**	19	High Road (N17)/White Hart Lane	0	4	21	13	6	6
5	**B5**	18	Endymion Road / Green Lanes	0	1	21	12	5	5
6	**B6**	17	Green Lane/St Anns Road	0	2	16	7	5	6
7	**B7**	15	High Road (N22)/Bounds Green Road	0	0	20	4	10	6
8	**B8**	14	Green Lanes/Colina Rd(Ats)	0	2	14	9	3	4
9	**B9**	14	Bounds Green Rd/Durnsford Rd	0	1	19	7	5	8
10	**B10**	13	High Road (N17)/Dowsett Road	0	0	14	4	3	7
11	**B11**	11	Colney Hatch Lane/Alexandra Park Rd	0	1	12	1	4	8
12	**B12**	11	Muswell Hill/Priory Rd	0	0	16	4	8	4
13	**B13**	10	Lordship Lane/High Road (N17)	0	2	15	10	5	2
14	**B14**	10	Turnpike Lane/Wightman Rd	0	2	13	4	5	6
15	**B15**	10	Woodside Ave/Muswell Hill Rd	0	2	10	3	6	3
16	**B16**	10	Muswell Hill Rd/Cranley Gdns	0	2	9	4	3	4
17	**B17**	10	High Road (N22)/White Hart Lane	0	1	13	7	3	4
18	**B18**	9	Green Lanes/Frobisher Rd(Ats)	0	0	11	5	1	5
19	**B19**	9	Lordship Lane/Westbury Ave	0	0	11	3	4	4
20	**B20**	8	High Street (N8)/Tottenham Lane	0	1	10	7	3	1
21	**B21**	8	Bounds Green Rd/Park Avenue	0	1	10	8	2	1
22	**B22**	8	Priory Rd/Middle Lane	0	1	9	3	5	2
23	**B23**	8	Green Lanes / Hermitage Road	0	0	9	6	1	2
24	**B24**	8	Queens Ave/Muswell Hill	0	0	8	3	2	3
25	**B25**	8	High Street (N8)/Church Lane	0	0	8	4	1	3
26	**B26**	7	West Green Rd/Belmont Rd	0	1	7	2	2	4
27	**B27**	7	d Green Road/Tollington Park/Upper Tollington	0	1	7	1	4	3
28	**B28**	7	High Road (N17)/Brantwood Road	0	0	9	1	2	6
29	**B29**	7	Brantwood Rd/Willoughby Lane	0	0	9	2	3	4
30	**B30**	7	Station Rd/Mayes Rd	0	0	7	3	1	3



Links Ranked on No of Collisions - All Road Users

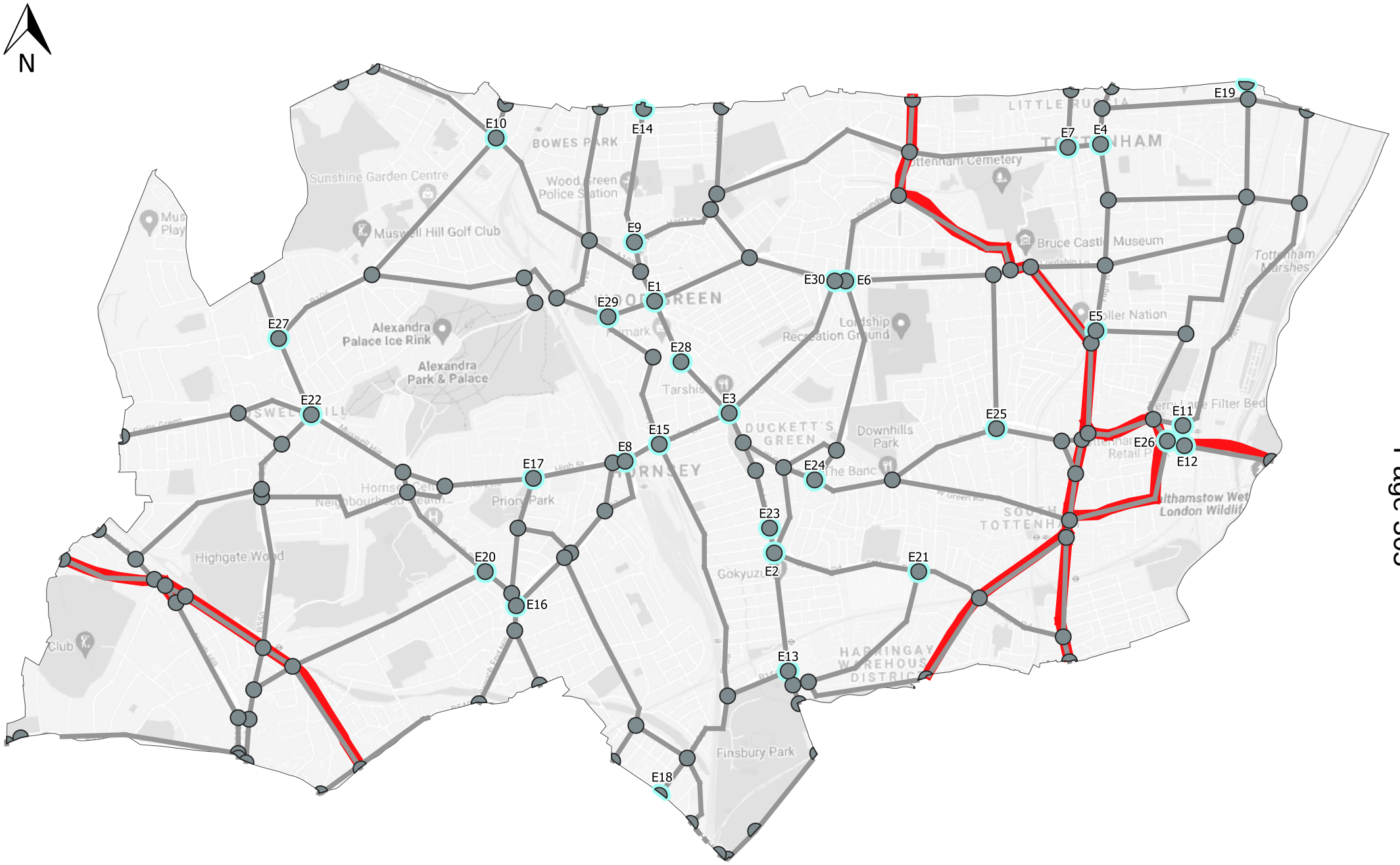
2017, 2018 and 2019 Data

Links and Nodes
Red Route

Haringey LONDON

CORRIDORS (LINKS) - All Road Users - 2017, 2018 and 2019 Data											
Top 30 Locations Ranked on No. of Collisions	Labels on the Collision Map	No of Collisions	No of Collisions per kilometre	Length (m)	Location	Fatal Casualties	Serious Casualties	Slight Casualties	2017 Casualties	2018 Casualties	2019 Casualties
1	**D1**	72	108	665.3	Green Lanes	0	15	72	35	26	26
2	**D2**	38	35	1071.38	West Green Rd	0	4	39	19	15	9
3	**D3**	37	45	830.68	Bounds Green Rd	0	2	38	16	13	11
4	**D4**	33	43	775.63	High Road N22	1	8	31	9	14	17
5	**D5**	32	25	1267.03	White Hart Lane	0	2	43	22	18	5
6	**D6**	30	94	320.46	High Road N17	0	4	31	14	10	11
7	**D7**	26	80	325.39	High Road N22	0	3	29	10	8	14
8	**D8**	25	71	352.64	High Road N22	0	4	28	8	16	8
9	**D9**	24	24	1012.72	Westbury Ave	0	7	26	15	8	10
10	**D10**	23	14	1614.18	Wightman Rd	0	3	23	5	11	10
12	**D12**	20	62	324.24	High Road N17	0	5	19	6	9	9
13	**D13**	20	71	280.77	Green Lanes	0	4	18	7	6	9
14	**D14**	20	51	392.2	Turnpike Lane	0	3	18	7	5	9
11	**D11**	20	35	570.97	Lordship Lane	0	2	24	10	6	10
15	**D15**	19	72	263.44	High Road N17	0	2	26	9	15	4
16	**D16**	19	18	1030.95	Downhills Way	0	2	19	4	9	8
17	**D17**	18	21	841.65	Brantwood Road	0	3	28	19	2	10
18	**D18**	18	163	110.17	Green Lane	0	3	18	8	8	5
19	**D19**	17	131	130.19	High Road N17	0	4	21	14	6	5
20	**D20**	17	36	469.83	Lordship Lane	0	0	18	11	5	2
21	**D21**	16	19	850.57	Lordship Lane	0	3	18	11	6	4
22	**D22**	15	23	656.33	Philip Lane	0	6	14	11	5	4
23	**D23**	15	16	924.09	White Hart Lane	0	2	13	6	5	4
24	**D24**	14	127	110.16	High Road N22	0	3	17	7	6	7
26	**D26**	14	9	1581.8	Watermead Way North - South Route	0	1	17	2	7	9
25	**D25**	14	13	1094.3	Ferme Park Rd	0	0	19	7	8	4
27	**D27**	14	16	862.97	St Anns Road	0	0	15	6	7	2
28	**D28**	13	38	339.4	St Anns Road	0	1	12	3	5	5
29	**D29**	12	28	425.07	West Green Rd	0	3	10	6	5	2
30	**D30**	11	10	1089.17	Durnsford Rd-Albert Rd	0	3	11	8	2	4

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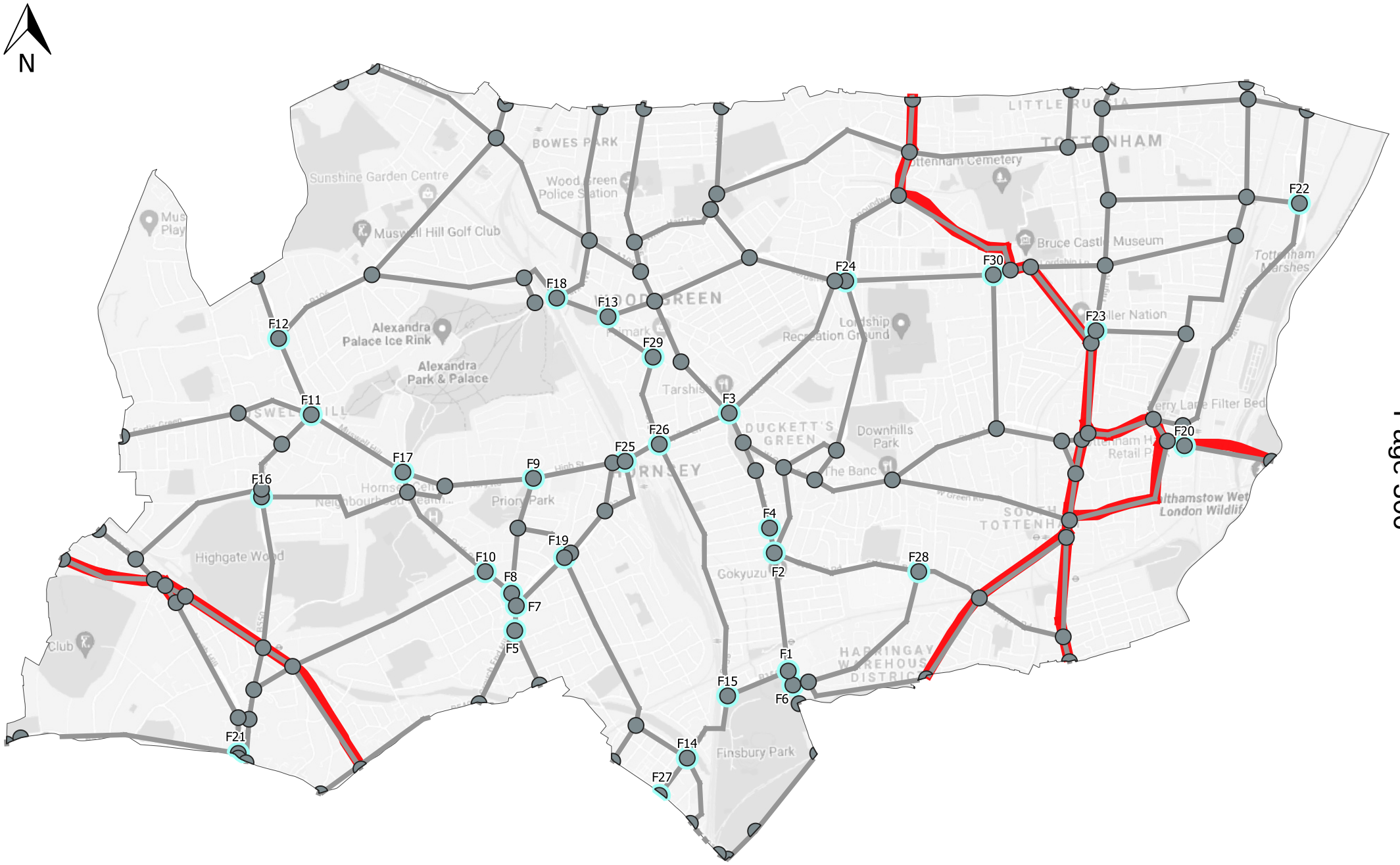
Top 30 Nodes Ranked on No of Pedestrian Casualties

2017, 2018 and 2019 Data

Links and Nodes

Red Route

Haringey LONDON


N
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BOWES PARK
Sunshine Garden Centre
Muswell Hill Golf Club
Wood Green Police Station
Alexandra Palace Ice Rink
Alexandra Park & Palace
Tottenham Cemetery
Bruce Castle Museum
Lordship Recreation Ground
Tarshish
DUCKETT'S GREEN
Downhills Park
Priory Park
Highgate Wood
Gokyuzu
Finsbury Park
Tottenham Marshes
Page 306
Top 30 Nodes Ranked on No of Cyclist Casualties
2017, 2018 and 2019 Data
Links and Nodes
Red Route
Haringey
LONDON



Top 30 Nodes Ranked on No of Motorcyclist

2017, 2018 and 2019 Data

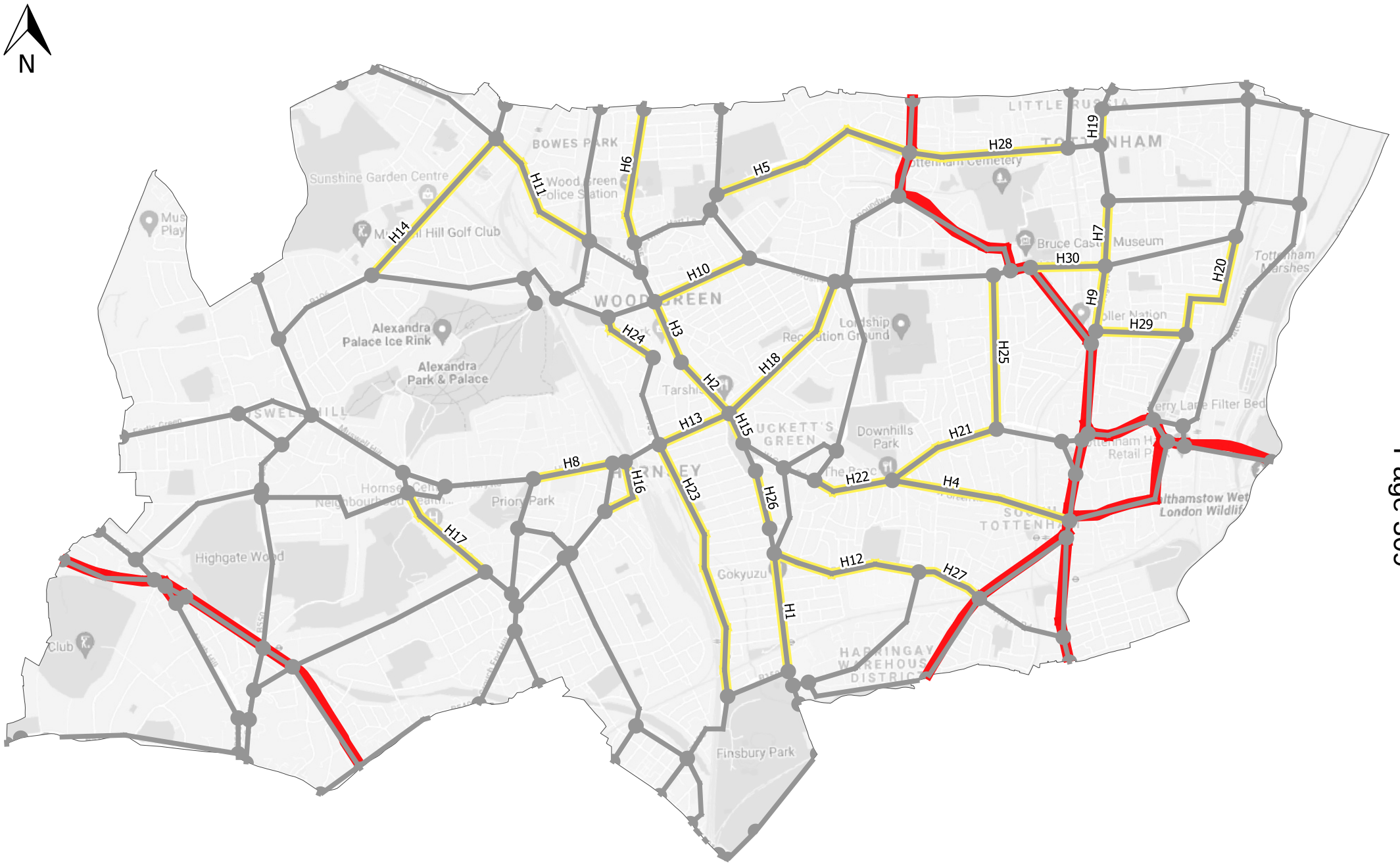
Links and Nodes

Red Route

Haringey LONDON

VULNERABLE ROAD USER CASUALTIES AT JUNCTIONS (2017, 2018 and 2019)

Location	Pedestrian Casualties	Top 30 Locations / Legend on Pedestrian Map	Pedestrian Fatal Casualties	Pedestrian Serious Casualties	Pedestrian Slight Casualties	Cyclist Casualties	Top 30 Locations / Legend on Pedal Map	Cyclist Fatal Casualties	Cyclist Serious Casualties	Cyclist Slight Casualties	Powered 2 Wheeler Casualties	Top 30 Locations / Legend on P2W Map	P2W Fatal Casualties	P2W Serious Casualties	P2W Slight Casualties	Total (vulnerable road user) casualties at junctions (nodes)
High Road (N22)/Lordship Lane	20	E1	0	2	18			0	0	0	3	G13	0	0	3	23
Green Lane/St Anns Road	9	E2	0	1	8	4	F2	0	1	3	3	G10	0	0	3	16
High Road (N22)/Turnpike Lane	8	E3	0	1	7	4	F3	0	0	4	3	G11	0	0	3	15
Green Lanes/Colina Rd(Ats)	2	E23	0	0	2	3	F4	0	1	2	7	G1	0	1	6	12
Endymion Road / Green Lanes	3	E13	0	0	3	6	F1	0	1	5	1		0	0	1	10
High Road (N17)/Dowsett Road	4	E5	0	0	4	1	F23	0	0	1	4	G6	0	0	4	9
Lordship Lane/The Roundway (West)	4	E6	0	0	4	1	F24	0	0	1	4	G7	0	0	4	9
High Road (N17)/White Hart Lane	6	E4	0	2	4			0	0	0	2	G23	0	0	2	8
Colney Hatch Lane/Alexandra Park Rd	2	E27	0	0	2	2	F12	0	0	2	3	G8	0	1	2	7
Muswell Hill Rd/Cranley Gdns	1		0	0	1	2	F16	0	0	2	4	G4	0	2	2	7
High Street (N8)/Tottenham Lane	3	E8	0	1	2	1	F25	0	0	1	2	G20	0	0	2	6
Queens Ave/Muswell Hill	2	E22	0	0	2	2	F11	0	0	2	2	G18	0	0	2	6
Green Lanes / Hermitage Road	2		0	0	2	3	F6	0	0	3	1		0	0	1	6
Woodside Ave/Muswell Hill Rd			0	0	0	1		0	0	1	5	G2	0	2	3	6
Bounds Green Rd/Durnsford Rd	3	E10	0	0	3			0	0	0	2	G24	0	0	2	5
High Rd J/W Lascotts Rd	3	E14	0	0	3			0	0	0	2	G25	0	0	2	5
Stroud Green Road/Tollington Park/Upper Tollington Park	2	E18	0	1	1	1	F27	0	0	1	2	G21	0	0	2	5
Priory Rd/Middle Lane	2	E17	0	1	1	2	F9	0	0	2	1		0	0	1	5
West Green Rd/Belmont Rd	2	E24	0	0	2			0	0	0	3	G9	0	1	2	5
Muswell Hill/Priory Rd	1		0	0	1	2	F17	0	0	2	2	G19	0	0	2	5
Ferme Park Rd J/W A103			0	0	0	2	F19	0	0	2	3	G12	0	0	3	5
Green Lanes/Frobisher Rd(Ats)			0	0	0			0	0	0	5	G3	0	0	5	5
White Hart Ln J/W Petoria Rd N17	3	E7	0	2	1			0	0	0	1		0	0	1	4
High Road (N22)/White Hart Lane	3	E9	0	1	2			0	0	0	1		0	0	1	4
Ferry Ln J/W Monument Way	3	E12	0	0	3	1	F20	0	1	0			0	0	0	4
Turnpike Lane/Wightman Rd	2	E15	0	2	0	1	F26	0	0	1	1		0	0	1	4
Weston Park J/W A103	2	E16	0	1	1	2	F7	0	1	1			0	0	0	4
Park Rd J/W Wolseley Rd	2	E20	0	0	2	2	F10	0	0	2			0	0	0	4
Station Rd/Mayes Rd	2	E29	0	0	2	2	F13	0	0	2			0	0	0	4
Philip Ln J/W Philip Ln	2	E25	0	0	2			0	0	0	2	G26	0	0	2	4
Lordship Lane/Westbury Ave	2	E30	0	0	2			0	0	0	2	G27	0	0	2	4
B150 J/W B138	1		0	0	1	2	F15	0	0	2	1		0	1	0	4
Lordship Ln J/W Mount Pleasant Rd	1		0	0	1	1	F30	0	0	1	2	G15	0	1	1	4
Coleridge Rd J/W A1201	1		0	0	1	3	F5	0	1	2			0	0	0	4
Bounds Green Rd/Park Avenue	1		0	0	1	1		0	0	1	2	G22	0	0	2	4
Middle Lane J/W A1201			0	0	0	2	F8	0	1	1	2	G17	0	0	2	4
Woodside Av/Great N Road			0	0	0			0	0	0	4	G5	0	1	3	4
Watermead Way J/W Station Rd	3	E11	0	0	3			0	0	0			0	0	0	3
St Ann's Rd J/W North Gr	2	E21	0	0	2	1	F28	0	0	1			0	0	0	3
Ferry Ln J/W Brodway Ln	2	E26	0	0	2			0	0	0	1		0	0	1	3
On High Rd N22 J/W Alexander Rd N22	2	E28	0	0	2			0	0	0	1		0	0	1	3
B150 J/W Florence Rd	1		0	0	1	2	F14	0	0	2			0	0	0	3
Station Rd J/W Park Av	1		0	0	1	2	F18	0	0	2			0	0	0	3
Hornsey Park Rd J/W Mayes Rd	1		0	0	1	1	F29	0	0	1	1		0	0	1	3
Shelbourne Rd J/W Park Ln N17	1		0	0	1			0	0	0	2	G16	0	1	1	3
High Road (N22)/Bounds Green Road			0	0	0			0	0	0	3	G14	0	0	3	3
Willoughby Ln J/W Leeside Rd	2	E19	0	1	1			0	0	0			0	0	0	2
Watermead Way N17 J/W Marigold Rd N17			0	0	0	1	F22	0	1	0	1		0	0	1	2
Florence Rd J/W Stapleton Hall Rd			0	0	0			0	0	0	2	G28	0	0	2	2
Rokesly Ave J/W A103			0	0	0			0	0	0	2	G29	0	0	2	2
St James Lane J/W B550			0	0	0			0	0	0	2	G30	0	0	2	2
Hampstead Ln J/W B519			0	0	0	1	F21	0	1	0			0	0	0	1

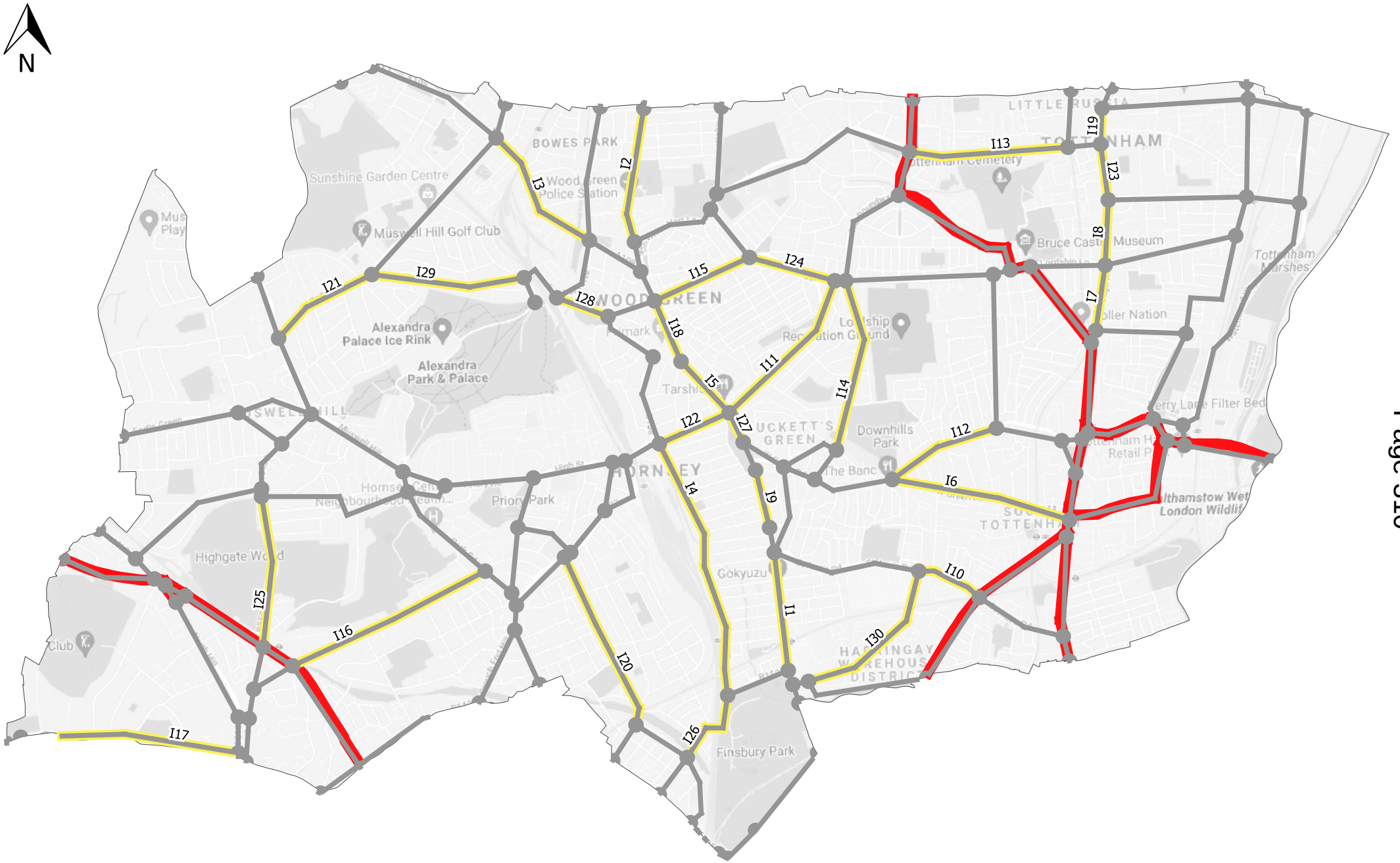


Links Ranked on No of Pedestrian Casualties

2017, 2018 and 2019 Data

Links and Nodes
Red Route

Haringey LONDON



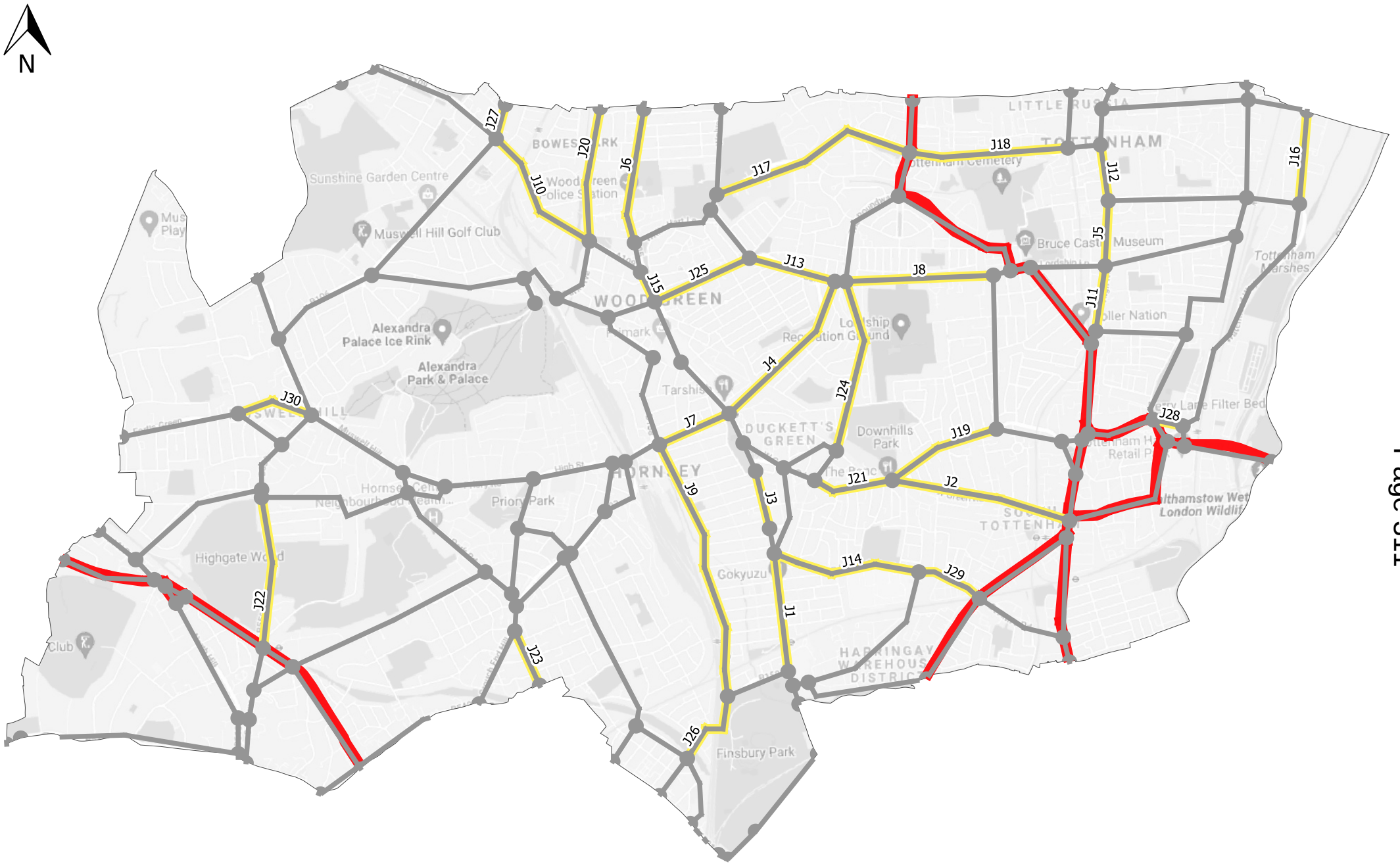
Links Ranked on No of Cyclist Casualties

2017, 2018 and 2019 Data

Links and Nodes

Red Route

Haringey LONDON



Links Ranked on No of Motorcyclist Casualties

2017, 2018 and 2019 Data

Links and Nodes

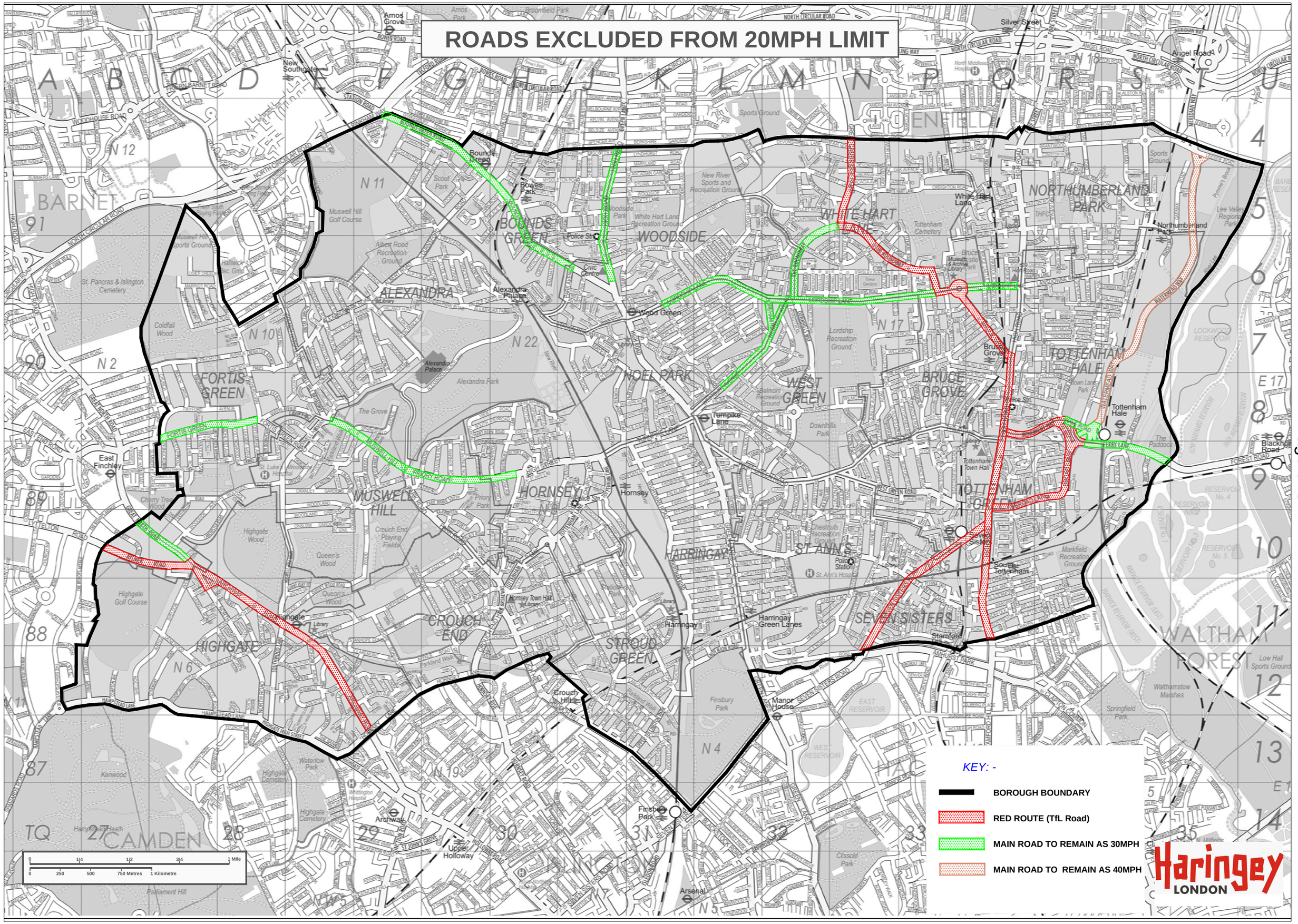
Red Route

Haringey LONDON

VULNERABLE ROAD USER CASUALTIES ALONG CORRIDORS (2017, 2018 and 2019)

Location	Pedestrian Casualties	Top 30 Locations / Legend on Pedestrian Map	Pedestrian Fatal Casualties	Pedestrian Serious Casualties	Pedestrian Slight Casualties	Cyclist Casualties	Top 30 Locations / Legend on Pedal Map	Cyclist Fatal Casualties	Cyclist Serious Casualties	Cyclist Slight Casualties	Powered 2 Wheeler Casualties	Top 30 Locations / Legend on P2W Map	P2W Fatal Casualties	P2W Serious Casualties	P2W Slight Casualties	Total (vulnerable road user) casualties along corridors (links)
Green Lanes	17	H1	0	7	10	14	I1	0	4	10	24	J1	0	2	22	55
High Road N22	7	H6	1	2	4	12	I2	0	4	8	8	J6	0	1	7	27
West Green Rd	10	H4	0	1	9	5	I6	0	0	5	10	J2	0	3	7	25
High Road N22	13	H2	0	2	11	6	I5	0	1	5	1		0	1	0	20
High Road N17	7	H7	0	0	7	4	I8	0	1	3	8	J5	0	2	6	19
Bounds Green Rd	6	H11	0	0	6	7	I3	0	0	7	5	J10	0	2	3	18
Wightman Rd	4	H23	0	0	4	6	I4	0	2	4	7	J9	0	1	6	17
High Road N17	6	H9	0	3	3	5	I7	0	0	5	5	J11	0	1	4	16
Westbury Ave	4	H18	0	3	1	3	I11	0	2	1	9	J4	0	1	8	16
Green Lanes	3	H26	0	1	2	4	I9	0	0	4	9	J3	0	3	6	16
High Road N22	10	H3	0	3	7	3	I18	0	0	3	2		0	0	2	15
Turnpike Lane	5	H13	0	2	3	2	I22	0	0	2	8	J7	0	1	7	15
White Hart Lane	8	H5	0	1	7	0		0	0	0	4	J17	0	1	3	12
Lordship Lane	6	H10	0	1	5	3	I15	0	1	2	3	J25	0	0	3	12
St Ann'S Rd	6	H12	0	0	6	1		0	0	1	5	J14	0	0	5	12
Philip Lane	4	H21	0	1	3	3	I12	0	2	1	4	J19	0	1	3	11
St Anns Road	3	H27	0	0	3	4	I10	0	0	4	3	J29	0	0	3	10
White Hart Lane	3	H28	0	0	3	3	I13	0	1	2	4	J18	0	1	3	10
Green Lane	5	H15	0	1	4	2	I27	0	0	2	2		0	1	1	9
High Road N17	4	H19	0	2	2	3	I19	0	0	3	2		0	0	2	9
Lordship Lane	2		0	0	2	2	I24	0	0	2	5	J13	0	0	5	9
Lordship Lane	1		0	1	0	1		0	1	0	7	J8	0	1	6	9
West Green Rd	4	H22	0	1	3	1		0	0	1	3	J21	0	2	1	8
Downhills Way	2		0	1	1	3	I14	0	1	2	3	J24	0	0	3	8
High Road N17	1		0	0	1	2	I23	0	0	2	5	J12	0	1	4	8
High Street N8	6	H8	1	1	4	0		0	0	0	1		0	0	1	7
High Road N22	2		0	0	2	1		0	0	1	4	J15	0	3	1	7
Tottenham Lane	5	H16	0	1	4	1		0	0	1	0		0	0	0	6
Park Rd	5	H17	0	0	5	0		0	0	0	1		0	0	1	6
Mayes Rd	4	H24	0	0	4	0		0	0	0	2		0	0	2	6
Wolseley Rd-Shepherds Hill	1		0	1	0	3	I16	0	1	2	2		0	0	2	6
Ferme Park Rd	1		0	0	1	3	I20	0	0	3	2		0	0	2	6
Muswell Hill Rd	1		0	0	1	2	I25	0	0	2	3	J22	0	1	2	6
Durnsford Rd-Albert Rd	5	H14	0	2	3	0		0	0	0	0		0	0	0	5
Havelock Rd-Roseberry Ave-Shelbourne Rd	4	H20	0	2	2	0		0	0	0	1		0	0	1	5
Lordship Lane	3	H30	0	0	3	0		0	0	0	2		0	0	2	5
Crouch Hill	2		0	1	1	0		0	0	0	3	J23	0	1	2	5
Upper Tollington Park-Endymion Rd	0		0	0	0	2	I26	0	0	2	3	J26	0	0	3	5
Dowsett Rd	3	H29	0	0	3	1		0	0	1	0		0	0	0	4
Brownlow Rd	1		0	0	1	0		0	0	0	3	J27	0	0	3	4
Watermead Way (North-South Route)	0		0	0	0	0		0	0	0	4	J16	0	2	2	4
Mount Pleasant Rd	3	H25	0	2	1	0		0	0	0	0		0	0	0	3
Alexandra Park Rd	1		0	0	1	2	I21	0	1	1	0		0	0	0	3
Hermitage Road	1		0	0	1	2	I30	0	0	2	0		0	0	0	3
Station Rd	0		0	0	0	2	I28	0	0	2	1		0	0	1	3
Palmerston Road-Finsbury Road	0		0	0	0	0		0	0	0	3	J20	0	3	0	3
Hale Rd	0		0	0	0	0		0	0	0	3	J28	0	0	3	3
Hampstead Lane	0		0	0	0	3	I17	0	1	2	0		0	0	0	3
Queens Ave	0		0	0	0	0		0	0	0	3	J30	0	0	3	3
Alexandra Park Rd-Palace Gates Rd	0		0	0	0	2	I29	0	0	2	0		0	0	0	2

ROADS EXCLUDED FROM 20MPH LIMIT



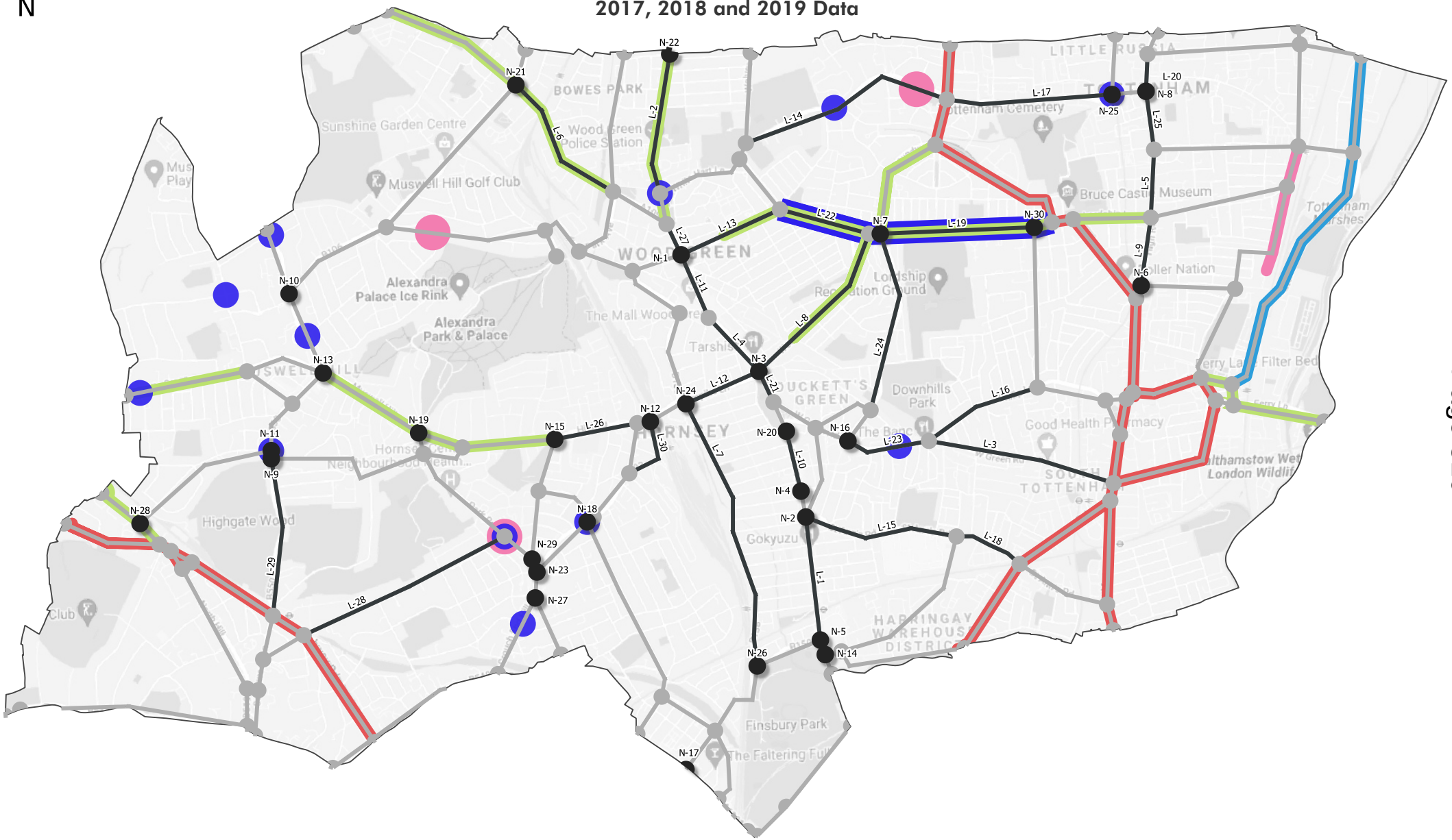
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VULNERABLE ROAD USER CASUALTIES AT JUNCTIONS (2017, 2018 and 2019)

Nodes	Location	Pedestrian Casualties	Top 30 Locations / Legend on Pedestrian Map	Pedestrian Fatal Casualties	Pedestrian Serious Casualties	Pedestrian Slight Casualties	Cyclist Casualties	Top 30 Locations / Legend on Pedal Map	Cyclist Fatal Casualties	Cyclist Serious Casualties	Cyclist Slight Casualties	Powered 2 Wheeler Casualties	Top 30 Locations / Legend on P2W Map	P2W Fatal Casualties	P2W Serious Casualties	P2W Slight Casualties	Total (vulnerable road user) casualties at junctions (nodes)
127	High Road (N22)/Lordship Lane	20	E1	0	2	18			0	0	0	3	G13	0	0	3	23
67	Green Lane/St Anns Road	9	E2	0	1	8	4	F2	0	1	3	3	G10	0	0	3	16
103	High Road (N22)/Turnpike Lane	8	E3	0	1	7	4	F3	0	0	4	3	G11	0	0	3	15
85	Green Lanes/Colina Rd(Ats)	2	E23	0	0	2	3	F4	0	1	2	7	G1	0	1	6	12
673	Endymion Road / Green Lanes	3	E13	0	0	3	6	F1	0	1	5	1		0	0	1	10
132	High Road (N17)/Dowsett Road	4	E5	0	0	4	1	F23	0	0	1	4	G6	0	0	4	9
147	Lordship Lane/The Roundway (West)	4	E6	0	0	4	1	F24	0	0	1	4	G7	0	0	4	9
182	High Road (N17)/White Hart Lane	6	E4	0	2	4			0	0	0	2	G23	0	0	2	8
117	Colney Hatch Lane/Alexandra Park Rd	2	E27	0	0	2	2	F12	0	0	2	3	G8	0	1	2	7
56	Muswell Hill Rd/Cranley Gdns	1		0	0	1	2	F16	0	0	2	4	G4	0	2	2	7
92	High Street (N8)/Tottenham Lane	3	E8	0	1	2	1	F25	0	0	1	2	G20	0	0	2	6
76	Queens Ave/Muswell Hill	2	E22	0	0	2	2	F11	0	0	2	2	G18	0	0	2	6
672	Green Lanes / Hermitage Road	2		0	0	2	3	F6	0	0	3	1		0	0	1	6
54	Woodside Ave/Muswell Hill Rd			0	0	0	1		0	0	1	5	G2	0	2	3	6
174	Bounds Green Rd/Durnsford Rd	3	E10	0	0	3			0	0	0	2	G24	0	0	2	5
723	High Rd J/W Lascotts Rd	3	E14	0	0	3			0	0	0	2	G25	0	0	2	5
703	Stroud Green Road/Tollington Park/Upper Tollington Park	2	E18	0	1	1	1	F27	0	0	1	2	G21	0	0	2	5
82	Priory Rd/Middle Lane	2	E17	0	1	1	2	F9	0	0	2	1		0	0	1	5
98	West Green Rd/Belmont Rd	2	E24	0	0	2			0	0	0	3	G9	0	1	2	5
77	Muswell Hill/Priory Rd	1		0	0	1	2	F17	0	0	2	2	G19	0	0	2	5
63	Ferme Park Rd J/W A103			0	0	0	2	F19	0	0	2	3	G12	0	0	3	5
90	Green Lanes/Frobisher Rd(Ats)			0	0	0			0	0	0	5	G3	0	0	5	5
181	White Hart Ln J/W Petoria Rd N17	3	E7	0	2	1			0	0	0	1		0	0	1	4
157	High Road (N22)/White Hart Lane	3	E9	0	1	2			0	0	0	1		0	0	1	4
214	Ferry Ln J/W Monument Way	3	E12	0	0	3	1	F20	0	1	0			0	0	0	4
94	Turnpike Lane/Wightman Rd	2	E15	0	2	0	1	F26	0	0	1	1		0	0	1	4
51	Weston Park J/W A103	2	E16	0	1	1	2	F7	0	1	1			0	0	0	4
48	Park Rd J/W Wolseley Rd	2	E20	0	0	2	2	F10	0	0	2			0	0	0	4
124	Station Rd/Mayes Rd	2	E29	0	0	2	2	F13	0	0	2			0	0	0	4
107	Philip Ln J/W Philip Ln	2	E25	0	0	2			0	0	0	2	G26	0	0	2	4

Top Priority Links & Nodes Ranked on No of Pedestrian, Cyclist and Motorcyclist Casualties

2017, 2018 and 2019 Data



Haringey LONDON

Top Priority Locations:
- Top Priority Links
- Top Priority Nodes

Speed Limits:
- 30 mph
- 40 mph

LIP and Requests:
- LIP Submissions
- Member Requests

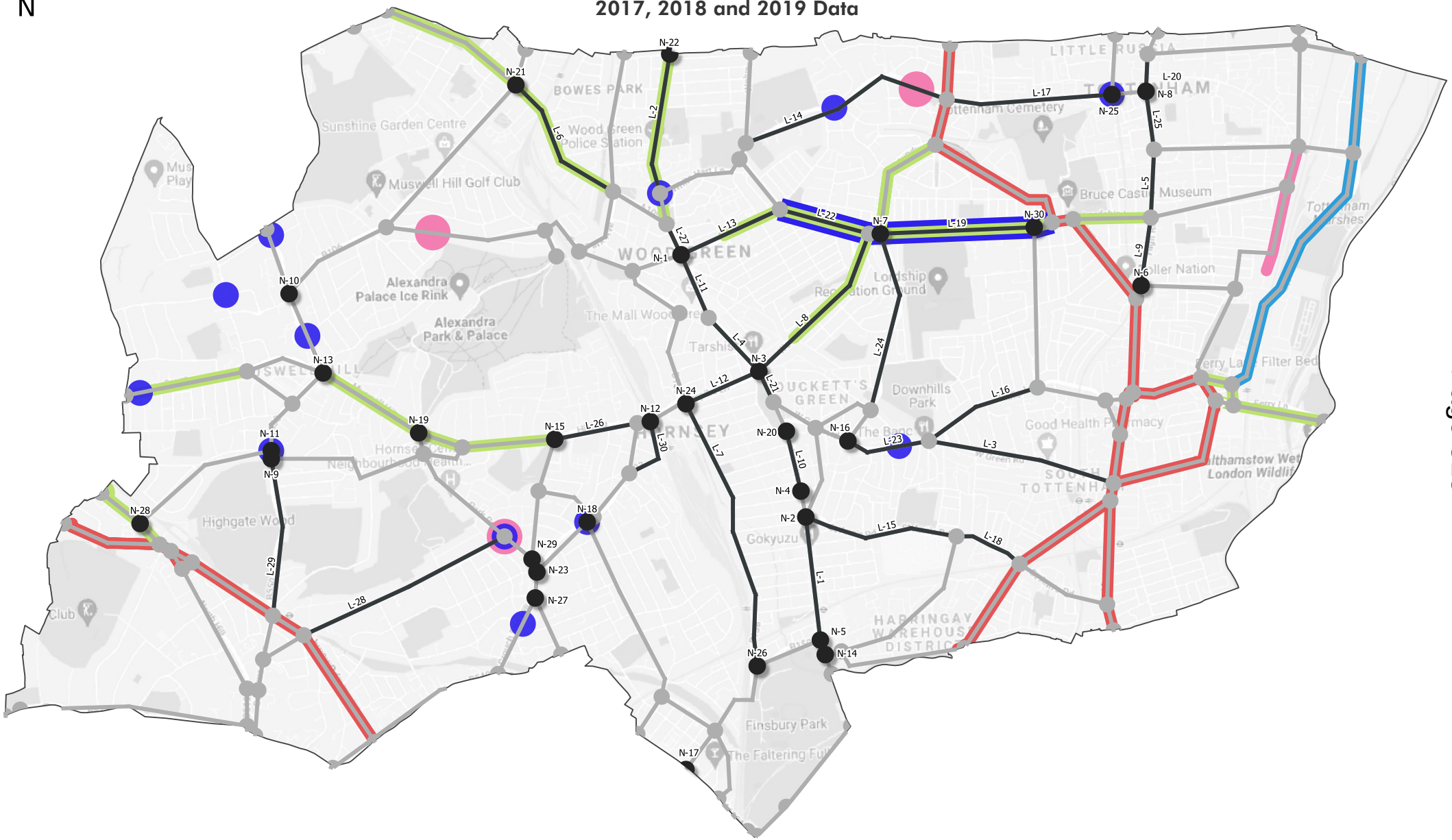
Road Network:
- Links and Nodes
- Red Route

VULNERABLE ROAD USER CASUALTIES ALONG CORRIDORS (2017, 2018 and 2019)

Location	Pedestrian Casualties	Top 30 Locations / Legend on Pedestrian Map	Pedestrian Fatal Casualties	Pedestrian Serious Casualties	Pedestrian Slight Casualties	Cyclist Casualties	Top 30 Locations / Legend on Pedal Map	Cyclist Fatal Casualties	Cyclist Serious Casualties	Cyclist Slight Casualties	Powered 2 Wheeler Casualties	Top 30 Locations / Legend on P2W Map	P2W Fatal Casualties	P2W Serious Casualties	P2W Slight Casualties	Total (vulnerable road user) casualties along corridors (links)
Green Lanes	17	H1	0	7	10	14	I1	0	4	10	24	J1	0	2	22	55
High Road N22	7	H6	1	2	4	12	I2	0	4	8	8	J6	0	1	7	27
West Green Rd	10	H4	0	1	9	5	I6	0	0	5	10	J2	0	3	7	25
High Road N22	13	H2	0	2	11	6	I5	0	1	5	1		0	1	0	20
High Road N17	7	H7	0	0	7	4	I8	0	1	3	8	J5	0	2	6	19
Bounds Green Rd	6	H11	0	0	6	7	I3	0	0	7	5	J10	0	2	3	18
Wightman Rd	4	H23	0	0	4	6	I4	0	2	4	7	J9	0	1	6	17
High Road N17	6	H9	0	3	3	5	I7	0	0	5	5	J11	0	1	4	16
Westbury Ave	4	H18	0	3	1	3	I11	0	2	1	9	J4	0	1	8	16
Green Lanes	3	H26	0	1	2	4	I9	0	0	4	9	J3	0	3	6	16
High Road N22	10	H3	0	3	7	3	I18	0	0	3	2		0	0	2	15
Turnpike Lane	5	H13	0	2	3	2	I22	0	0	2	8	J7	0	1	7	15
White Hart Lane	8	H5	0	1	7	0		0	0	0	4	J17	0	1	3	12
Lordship Lane	6	H10	0	1	5	3	I15	0	1	2	3	J25	0	0	3	12
St Ann'S Rd	6	H12	0	0	6	1		0	0	1	5	J14	0	0	5	12
Philip Lane	4	H21	0	1	3	3	I12	0	2	1	4	J19	0	1	3	11
St Anns Road	3	H27	0	0	3	4	I10	0	0	4	3	J29	0	0	3	10
White Hart Lane	3	H28	0	0	3	3	I13	0	1	2	4	J18	0	1	3	10
Green Lane	5	H15	0	1	4	2	I27	0	0	2	2		0	1	1	9
High Road N17	4	H19	0	2	2	3	I19	0	0	3	2		0	0	2	9
Lordship Lane	2		0	0	2	2	I24	0	0	2	5	J13	0	0	5	9
Lordship Lane	1		0	1	0	1		0	1	0	7	J8	0	1	6	9
West Green Rd	4	H22	0	1	3	1		0	0	1	3	J21	0	2	1	8
Downhills Way	2		0	1	1	3	I14	0	1	2	3	J24	0	0	3	8
High Road N17	1		0	0	1	2	I23	0	0	2	5	J12	0	1	4	8
High Street N8	6	H8	1	1	4	0		0	0	0	1		0	0	1	7
High Road N22	2		0	0	2	1		0	0	1	4	J15	0	3	1	7
Tottenham Lane	5	H16	0	1	4	1		0	0	1	0		0	0	0	6
Park Rd	5	H17	0	0	5	0		0	0	0	1		0	0	1	6
Mayes Rd	4	H24	0	0	4	0		0	0	0	2		0	0	2	6

Top Priority Links & Nodes Ranked on No of Pedestrian, Cyclist and Motorcyclist Casualties

2017, 2018 and 2019 Data



Haringey LONDON

Top Priority Locations:
- Top Priority Links
- Top Priority Nodes

Speed Limits:
- 30 mph
- 40 mph

LIP and Requests:
- LIP Submissions
- Member Requests

Road Network:
- Links and Nodes
- Red Route

Agenda Item 13

Report for: Cabinet – 8 March 2022

Title: Parking Investment Plan

Report authorised by: Stephen McDonnell, Director of Environment and Neighbourhoods

Lead Officer: Ann Cunningham, Head of Highways and Parking
0208 489 1355, Ann.Cunningham@haringey.gov.uk

Ward(s) affected: All

Report for Key/ Non-Key Decision: Key Decision

1 Describe the issue under consideration

1.1 Parking plays a dynamic role in the delivery of the Council's Transport Strategy and supports the delivery of Borough Plan objectives, as well as wider Council policies. Management of parking - including its change of use - plays a part in enabling communities and individuals to live better lives by accessing more opportunities, living in a better environment, and having options that benefit the many.

1.2 The Council has agreed investment in parking from its capital budget. This includes funding for projects identified as part of the parking transformation programme such as the review and roll-out of controlled parking zones (CPZs), and other specific projects. The Council will also benefit from developer funding to undertake parking control changes. Budgets for specific works have also been secured (which includes £100k for the review of footway parking) as part of the £5.1m for 'Streetspace Plan projects' from the Strategic Community Infrastructure Levy.

1.3 This report sets out the proposed programme of works funded through a combination of budgets, including some estimated carried forward from 2021/22. The funding to deliver the Parking Investment Plan is summarised below with more information provided in Appendix 1.

Capital Budget 2022/23

- Borough Parking Plan £321k
- Footway parking review £100k (Streetspace Plan projects SCIL)
- Parking Transformation: CPZ programme £172k estimated carry forward from 2021/22
- Developer funding: £287k for CPZs (including an estimated carry forward from 2021/22 of £37k)

2 Cabinet Member Introduction

2.1 Parking policies can play a major role in shaping a neighbourhood and how our public realm is used. This paper highlights a range of actions we are undertaking to make positive changes to our borough.

2.2 Pedestrians, disabled people and those with mobility needs are at the heart of our policy making process and reflected in this paper.

2.3 We have already started an ambitious programme of work tackling pavement parking in the borough. A robust assessment of all pavement parking has been undertaken and we are now ready to start engagement with our residents to co-produce solutions looking at a range of options bespoke to local areas that put pedestrians first.

2.4 Working with disability groups and the police, we have continued our determination to reduce Blue Badge theft and fraud. Since the introduction of our free virtual disability permit, over 1000 Blue Badge holders have already increased the protection of their Blue Badges. We will increase take-up through more engagement and encouragement with our partner organisations.

2.5 Disabled residents feel it is deeply unjust that they are having to pay for replacement Blue Badges when they are stolen. Victims are already burdened with costs to repair of their vehicles. As requested, we will scrap the replacement fee for all residents who have their Blue Badge stolen.

2.6 We have listened to our residents about the limitations to our current parking offer for those receiving care at home. This paper commits us to co-producing a parking solution with residents who receive care at home that is conducive to their complex needs and removes any charges. Residents receiving care at home should not be financially penalised by needing to purchase carer and visitor permits.

2.7 Our parking enforcement service on residential streets continues to be in high demand, we will continue to engage all residents about the parking control measures (CPZs) we can offer. We are piloting the use of Red Routes that we can now implement due to recent changes in the law to combat parking concerns raised by residents. Should this be successful, we will work with residents to identify other parts of the borough to roll out this restriction.

2.8 We are continuing to roll out disabled parking improvements to our residents, giving them the choice of dedicated bays and expansion of the sizes of their bays, sending a clear message that they have priority over our parking spaces.

2.9 We have listened to residents living around 'car-free-developments' and the adverse impact of parking pressures on existing residential roads. This paper agrees to a review on 'car-free developments' to put in place changes to strengthen the intention of this policy.

2.10 Following a successful solution found with families of disabled children in Lawrence Road, we are now working closely with our SEND service to ensure we have fully provided parking for disabled children, especially for those who require

school transport which requires safe parking. We will also redesign the criteria used by the Planning Service to ensure parking for disabled residents is conducive to disabled people's needs.

2.11 This report describes how we will meet our strategic vision to use parking to place-shape our neighbourhoods and change policies that improve lives of disabled people and those with long-term health conditions.

2.12 It demonstrates that we have listened to our residents on the changes that they want to see and, once agreed, we will co-produce how this will be implemented.

3 Recommendations

Cabinet is asked:

3.1 To agree the Parking Investment Plan for the 2022/23 financial year, as set out in section 6 of the report, subject to the consultations not raising any significant or substantial issues: and

3.2 With regard to parking investment issues, to give delegated authority to the Head of Highways and Parking:

(i) To make decisions relating to scheme design and implementation;

(ii) To carry out consultations in accordance with Appendix 2 attached to this report and report any significant or substantial objections or concerns raised to the Cabinet Member for Customer Service, Welfare and the Public Realm; and

(iii) To make traffic management orders, having had due regard to any prior consultation, to give effect to those schemes.

3.3 To agree the waiver of the £10 administration fee for the replacement of stolen Blue Badges from 1 April 2022.

3.4 To agree to the development of a redesigned parking permit offer for residents being cared for in their homes.

3.5 To agree to the review of parking permit arrangements for car-free developments to strengthen associated policies.

3.6 To agree the need to redefine relevant policies to ensure a consistent understanding of disabled parking needs and their application, thereby ensuring that access to specialised transport meets the complex needs of disabled children and their carers.

4 Reasons for decisions

4.1 Parking policies play a major role in shaping neighbourhoods and how our public realm is used. The Council's Transport Strategy clearly identifies its vision for less reliance on the private car, especially for short journeys which can easily be undertaken (by most people) by walking, cycling and public transport.

4.2 Proposals in this report will:

- Ensure that residents with additional and complex needs have barriers (caused by current policies) removed.
- Co-produce parking control solutions with residents to reduce commuter parking, excessive visitor parking or parking pressures potentially caused by new developments in their neighbourhoods.
- Support innovation in the use of various traffic restraint measures for example Red Routes, to improve road safety.
- Ensure pedestrians and wheelchair users have priority use of our footways by removal of parking which encroaches on their right of way.
- Use our powers to protect Blue Badge holders from theft and fraud.

5 Alternative options considered

5.1 The proposed programme prioritises new CPZs having considered residents' views. The review of existing CPZs is in line with the Controlled Parking Policy agreed by Cabinet in March 2020 and will address concerns raised by residents. This will also support the Council's modal shift aspirations.

5.1 The programme will also be consolidated to take account of schemes delayed further due to the ongoing Covid-19 pandemic. Where possible, those schemes will now be progressed in the coming year, details of which are provided in Appendix 1.

5.2 Other programmes (such as review of footway parking, provision of electric vehicle charging points and car club bays) will also help contribute towards supporting modal shift and use of less polluting vehicles. These measures will help increase walking and cycling, thereby reducing air pollution and help towards addressing the climate emergency.

6 Background Information

6.1 The proposed Parking Investment Programme includes:

- Consultation on new CPZs
- The review of existing CPZs
- The introduction of Red Route restrictions
- The review of permitted footway parking
- The provision and lengthening of disabled parking bays
- The introduction of motorcycle bays
- The responsive service to deal with minor changes to parking arrangements.

Controlled Parking Zones

6.2 The 2022/23 CPZ programme is set out in Appendix 1 (Tables 1 to 2). This proposes consultation on 3 new CPZs, selected through resident demand and supported by ward councillors. This will initially involve informal consultation which is the co-design stage allowing residents and other stakeholders to express their views on proposals. The outcome of this consultation will determine whether the Council proceeds with any formal consultation on the introduction of those controls.

6.3 The Council aims to review all CPZs every 5 years or more frequently if there are concerns that arrangements in place no longer meet local needs. The 2022/2023 programme proposes the review of 3 CPZs.

6.4 The programme also includes the carry forward of 2021/22 schemes that are currently under way and with delivery planned to be completed in 2022/23.

6.5 A reserve list has been identified (Appendix 1, Table 3) to provide flexibility, should in-year funding be secured or if costs associated with planned schemes are lower than anticipated following consultation.

Review of footway parking

6.6 There are several factors that can act as a barrier to the provision of safe and accessible footways for all pedestrians (including those using mobility aids such as wheelchairs) and those with other physical, sensory or cognitive impairments travelling on foot. These include:

- inadequate footway width due to lack of space;
- footway width reduced by overgrown hedges;
- parking on the footway (including protruding wing mirrors);
- placement of street furniture (both fixed and non-fixed such as lamp columns, waste collection bins and boxes, etc).

6.7 In the draft Walking and Cycling Action Plan, ‘pavement users’ are ranked highest in the road user hierarchy, reflecting the principle that walking is the most sustainable (and healthiest) mode of travel. The Council is clear that footways should be accessible for all pedestrians, including those with a disability and is fully aware of its Public Sector Duty under the Equality Act 2010.

6.8 The Council has allocated Streetspace Plan capital funding to improve walking conditions by reviewing permitted footway parking and removing this where it is no longer appropriate to retain it. There is a considerable amount of permitted footway parking across the borough, with many locations restricting pedestrian access especially for those using a wheelchair or buggies/pushchairs.

6.9 Investigatory work has been undertaken in 2021/22 to better understand existing circumstances at over 100 permitted footway parking locations. In 2022/23, engagement with key disabled groups and other key stakeholders will be undertaken to help inform and develop an appropriate footway parking policy that achieves a suitable overall balance. The policy will be brought back for formal approval in autumn 2022. After this, consultations on proposed changes will commence, which will follow the approved policy guidance and procedure for consultation and reporting.

6.10 The Council is at a very early stage in transforming those footways. Completing consultation at all locations and subsequent delivery of approved measures may take a number of years to complete. Appendix 2 Table 5 provides details of the specific locations.

Provision of disabled parking bays

6.11 In March 2021/22, Haringey Council introduced a new Disabled Parking Action Plan. That document set out changes to existing and new disabled parking infrastructure. Specifically, it set out that all new 'general use and dedicated disabled bays' will be required to be a minimum of 6.6m in length. In addition, it set out the Council's plan to lengthen to 6.6 metres all existing general use and dedicated disabled bays that do not meeting this minimum criterion. Full details of the Action Plan can be found on the link provided below.

- https://www.minutes.haringey.gov.uk/documents/s122323/Disabled%20Parking%20Action%20Plan%20for%20Cabinet.pdf

6.12 During 2021/22, Haringey Council progressed applications for the installation of dedicated disabled parking bays. In addition, an extensive analysis of all disabled parking bays within the borough has been undertaken. There are 1,705 disabled parking bays on-street; of those, 1,336 bays require adjustment to meet the minimum length of 6.6 metres. The lengthening of those bays is subject to statutory consultation and is being undertaken in batches to help manage delivery of the programme. To date, a total of 640 bays have progressed to statutory consultation and are at various stages of the implementation process. The remainder of the works will be completed in 2022/2023.

SEND transport

6.13 The Council will build on a successful pilot scheme undertaken last year to address adverse impacts on children with additional and complex needs. The scheme entailed the successful co-design of solutions with parents of disabled children and the SEND service that removed barriers to disabled children's access to safe transport arrangements. This work will extend, where possible, to reviewing policies and guidance to create a consistent design approach for purpose-built developments that ensures all parking for disabled residents is conducive to their needs.

Red Route projects

6.14 Red Route restrictions are proposed to address illegal parking due to extreme parking pressures and associated anti-social and safety issues in two areas. Historically, these restrictions have solely been used by TfL to manage the strategic road network but are being introduced on a small scale by some London Boroughs. Those powers prohibit parking and allow enforcement by CCTV cameras. The use of these restrictions is being piloted to assess their value in addressing extreme local issues that cannot be effectively managed through on-street enforcement. In December 2021, consultations were undertaken for Clarendon Road and West Road Red Routes, decisions for both to be taken in 2022/23. The schemes are set out in Appendix 1, Table 4.

Minor Improvements Programme

6.15 The Council will also continue its responsive service, supported by funding, to ensure that the parking infrastructure is maintained to a high standard. Requests for doctors parking bays and motorcycle parking bays are considered upon request. Minor improvements will also be progressed in response to complaints or service requests, for example, additional double yellow lines to allow access or improve visibility around junctions or changes to parking bays to suit local requirements.

Car-Free Developments

6.16 Residents who live in a car-free development are not legally permitted to apply for an on-street parking permit. They may, however, purchase visitor parking permits. The growing impact of visitor parking permit use by car-free and car-capped developments is undermining planning restrictions and placing increased pressure in busy roads. A review will be conducted with Planning Service colleagues to put in place changes to strengthen the intention of this policy.

Parking Enforcement Policy Review

6.17 There have been several changes to parking policy in recent years. A further review will be conducted in the coming year. The Council is ambitious about reducing Blue Badge theft. A Blue Badge (Disabled Parking) Enforcement Policy was agreed by Cabinet in December 2021. The Council has since conducted a number of operations with the police to identify and seize stolen badges as well as those being misused by friends and family. The Council also introduced a virtual residential blue badge permit, to combat the opportunity for theft of Blue Badges from vehicles. This permit is used free of charge and can be used borough wide by Blue Badge holders. Despite this, there are still instances of Blue Badge theft and holders being charged for replacements. The £10 fee for the replacement of stolen Blue Badges will be waived from April 2022.

Carers' Permits

6.18 Personal care arrangements offered to residents in their own homes has changed. This, in many cases, involves a range of carers attending to an individual where car use is essential. This can range from family members to professional care arrangements. The parking arrangements in place for carers are specific to an individual as opposed to multiple providers. While the Essential Service Permit (ESP) is still available to professional carers, they find the costs prohibitive, leaving the financial burden of providing visitor permits to the resident. The policy review will co-produce a parking solution with residents who receive care at home that is conducive to their complex needs. It is anticipated that this solution will be free of charge.

7 Contribution to strategic outcomes

7.1 The Parking Investment Plan supports three themes within the Borough Plan 2019-2023 – People, Place and Economy.

7.2 **People Theme:** Our vision is a Haringey where strong families, strong networks and strong communities nurture all residents to live well and achieve their potential. A shift to sustainable modes of transport including walking and cycling will contribute to specific Outcomes within this theme including:

- Ensuring children have the best start in life e.g. less pollution and better air quality and improved road safety.
- All children in the borough will be happy and healthy as they grow up e.g. less pollution and better air quality and improved road safety.
- All adults are able to live healthy and fulfilling lives, with dignity, staying active and connected in their communities e.g. prioritised parking for local residents and their visitors, accessible junctions to promote walking and cycling. Dedicated disabled parking bays for residents who need them.

7.3 **Place Theme:** A place with strong, resilient & connected communities where people can lead active and healthy lives in an environment that is safe, clean and green. The Parking Investment Plan will contribute to specific Outcomes within this theme including:

- A healthier, active and greener place e.g. discouraging private car use promoting active travel benefiting the environment and health and wellbeing.
- A cleaner, accessible and attractive place e.g. better managed parking leading to more attractive streetscape, with improved accessibility for pedestrians.

7.4 **Economy Theme:** Our vision is for a growing economy that provides opportunities for all our residents and supports our businesses to thrive. The Parking Investment Plan and Vision will contribute to specific Outcomes within this theme including:

- A growing economy and thriving local businesses, supported by a community wealth building approach, e.g. loading provision to meet servicing needs for businesses and stop and shop facilities outside local high streets and near town centres enabling access especially for disabled users.

Statutory Officers' comments (Director of Finance (procurement), Head of Legal and Governance, Equalities)

8 Finance

8.1 This report sets out the expenditure for the 2022/23 Parking Investment Plan detailing all of the parking related activities and the various funding streams that have been confirmed within the Council's approved Capital Programme.

8.2 The Council, at its budget setting meeting in March 2022, is expected to agree the following budgets for inclusion within the capital programme.

8.3 The table below outlines the funding allocation of the investment plan for 2022/23. It should be noted that the table also includes an estimated carry forward of resources from 2021/22 which will be required to be approved by Cabinet as part of the draft outturn report for 2021/22.

Parking Investment Plan	LBH CP	Flexible Use CR	SCIL	S106	Total Confirmed Funding	Estimated 2021/22 C/Fwd	Estimated Total
	£,000	£,000	£,000	£,000	£,000	£,000	£,000
Borough Parking Plan	321				321	243	564
Parking Transformation: CPZ programme funding						172	172
Footway parking review			100		100	90	190
Developer funding for CPZs				250	250	37	287
Total	**321**		**100**	**250**	**671**	**542**	**1213**

9 Legal

9.1 The Head of Legal & Governance has been consulted on the preparation of this report and comments as follows.

9.2 The Council, as the traffic authority for the borough, has an obligation to secure the safe movement of traffic including pedestrians and the provision of suitable and adequate parking facilities.

9.3 This report seeks approval for the works programme for parking on the public highway for the financial year 2022/23 to secure the safe movement of traffic/pedestrians and provision of parking facilities which is a decision that Cabinet can take in accordance with the Council's Constitution.

10 Equality

10.1 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.

10.2 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.

10.3 The parking investment plan is an agreement in principle to proceed with the proposed projects detailed in Section 6 which vary in size from localised changes to impacting on multiple wards. As individual schemes come forward, detailed equalities analysis will be taken on the substance of each one before proceeding with a final decision. This is an important factor given the potentially significant differences between demographics for specific areas and the resulting impact on protected groups.

10.4 Feedback from residents including those with protected characteristics will be taken into account to ensure that the Council is upholding its obligations under the Public Sector Equality Duty. If deemed necessary an Equality Impact Assessment (EqIA) on an individual workstream or scheme within the programme will be considered on a case-by-case basis, allowing for any adjustments deemed necessary to meet obligations for those with protected characteristics.

11 Use of Appendices

Appendix 1: Investment Delivery Programme 2022/23
Appendix 2: Consultation

12 Local Government (Access to Information) Act 1985

- Haringey Transport Strategy
- Borough Plan
- Controlled Parking Policy

Appendix 1 – Investment Delivery Programme 2022/23

Table 1: 2022/23 CPZ programme - indicative budget for Borough Parking Plan £321k

Scheme Name or Location	Last Reviewed	Ward
Stroud Green CPZ Review	2011	Stroud Green
Tottenham North CPZ Review	2015	Northumberland Park
St Ann's CPZ Review	2016	St Ann's, Tottenham Green

Table 2: CPZ projects from 2021/22 to be progressed in 2022/23 utilising £315k (out of £415k) estimated carry forward Borough Parking Plan & CPZ funding and £287k developer funding

Scheme Name or Location	Last Reviewed	Progress Update	Ward
Green Lanes B CPZ Review - Operational hours	2008	Review to be undertaken in 2022/23	Haringey, St Ann's
Green Lanes A CPZ Review - Operational hours	2000	Review to be undertaken in 2022/23	Haringey, St Ann's
Muswell Hill South	New Area	Public consultation concluded in 2021/22 -decision to be taken 2022/23	Muswell Hill
Muswell Hill West Extension	New Area	Public consultation concluded in 2021/22 -decision to be taken in 2022/23	Muswell Hill
Tottenham Hale North Event Day CPZ Review	2018	Public and statutory consultation concluded - decision pending	Northumberland Park
TED Review (Tottenham West)	2015	Scheme approved in 2021/22 and to be implemented in 2022/23	Northumberland Park, Tottenham Hale & White Hart Lane
Crouch End 'B' Review	2011	Review to be undertaken in 2022/23	Crouch End
Crouch End 'A' Review	2011	Review to be undertaken in 2022/23	Crouch End, Muswell Hill, Stroud Green & Hornsey
Alexandra Palace West CPZ	New Scheme	Public consultation concluded in 2021/22 - decision to be taken in 2022/23	Alexandra
Seven Sisters CPZ Review	2007	Review to be undertaken in 2022/23	Tottenham Green

Appendix 1 – Investment Delivery Programme 2022/23

Scheme Name or Location	Last Reviewed	Progress Update	Ward
Finsbury Park CPZ Review	2011	Review to be undertaken in 2022/23	Stroud Green
Finsbury Park CPZ B Review	2011	Review to be undertaken in 2022/23	Stroud Green
Finsbury Park CPZ C Review	2011	Review to be undertaken in 2022/23	Stroud Green
Review of Hornsey North CPZ area including a review of Hornsey High Street	New Scheme	Public consultation concluded in 2021/22 - decision to be taken in 2022/23	Hornsey & Muswell Hill
White Hart Lane CPZ Review	2018	Public consultation concluded in 2021/22 - decision to be taken in 2022/23	White Hart Lane

Table 3: Reserve CPZ programme 2022/23

Scheme Name or Location	Last Reviewed	Ward
Bruce Castle CPZ Review	2018	Northumberland Park
St Lukes CPZ Review	2018	Fortis Green & Muswell Hill
Woodside New CPZ Area	N/A	Muswell Hill

Table 4: Red Routes projects from 2021/22 to be progressed in 2022/23 utilising £100k (out of £243k) estimated carry forward Borough Parking Plan

Location	Ward
Clarendon Road	Noel Park
West Road	Northumberland Park

Table 5: Locations of current permitted footway parking (Budget allocated £190k)

Appendix 1 – Investment Delivery Programme 2022/23

CPZ Name	Number of roads with footway parking
Alexandra Palace CPZ	2
Bounds Green East CPZ	1
Bruce Grove North (BGN)	4
Crouch End - CEA	6
Green Lanes A	1
Green Lanes B	7
Highgate HGA CPZ	1
Highgate Station (HG STA)	1
Hornsey South	3
Seven Sisters CPZ	3
Seven Sisters South CPZ	2
South Tottenham	2
St Lukes's CPZ	1
Stroud Green - SG	1
St Ann's	2
The Hale	2
Tottenham Event Day CPZ	16
Tottenham North CPZ	1
Tower Gardens Event Day CPZ (TGED)	5
White Hart Lane	12
Wood Green Inner	2
Wood Green Outer	10
Woodside West	1
UN-01	3
UN-04	1
UN-07	2
UN-08	6
UN-09	1
UN-14	2
Total	101

Appendix 2 – Consultation Methods

The various highways and traffic schemes developed through this works plan will be the subject of further consultation/ notification. The level of consultation/ notification will depend on the impact of the scheme on the local community. The three consultation/notification types are:

- Notification of works (all works) – residents and businesses of affected roads will be notified by letter drop on approval of the Parking Investment Plan. In addition, they will be notified by letter drop and any other appropriate media 3 weeks in advance of work commencing.

- Statutory notification **-** the public will be notified of the Council's intention regarding proposals through advertisements placed in the local press and on site. Residents and businesses of the affected roads will also be notified by letter drop. The notification will provide full details of the scheme and a commencement date for construction. Resident, businesses and other interested parties will have the opportunity to approve/object to these proposals and these considerations will be taken into account before implementing the scheme.

- Full public consultation – any high-profile schemes will be subject to full consultation which may include public events (where possible) and formal consultation questionnaires.

The Table below sets out the consultation process by scheme.

Scheme Name / Location.	**Consultation Type**		
	Notification	Statutory Notification	Full Consultation
Controlled Parking Zones			✓
Red Routes			✓
EVCP bays		✓	
Disabled parking bays		✓	
Minor improvements		✓	

Report for: Cabinet – 8 March 2022

Title: Outcome of Public Consultation for Wood Green Controlled Parking Zone Review

Report authorised by: Stephen McDonnell, Director of Environment and Neighbourhoods.

Lead Officers: Andrew Bourke, Parking Schemes Manager - Traffic and Parking andrew.bourke@haringey.gov.uk, and Ann Cunningham, Head of Highways and Parking, Ann.Cunningham@haringey.gov.uk

Ward(s) affected: Bounds Green, Harringay, Noel Park, St Ann's, West Green and Woodside

Report for Key/ Non-Key Decision: Key Decision

1. Describe the issue under consideration

1.1 This report sets out the results of public consultation undertaken between 19 July 2021 and 9 August 2021, on new controlled parking arrangements for the Wood Green area, replacing the existing (Wood Green) Inner and Outer Controlled Parking Zones (CPZs).

2. Cabinet Member Introduction

2.1 Parking management is a critical tool that has a huge impact upon the way that our streets, communities and road network operate as well as being a lever to improve air quality and, in turn, public health.

2.2 Our approach to parking aims to balance demands so that residents feel we are managing our approach to parking by consent. We therefore introduce or change parking controls when there is support for measures proposed and do not when we are told that existing arrangements work.

3. Recommendations

Cabinet is asked:

3.1 To note the results of the public consultation undertaken of the review of the Wood Green Control Parking Zones (CPZs).

3.2 To agree that, in line with current CPZ policy, no changes should be made to the existing Wood Green CPZs at this time.

4. Reasons for decisions

4.1 The Council adopted a formal CPZ policy (attached as **Appendix I)** in March 2020. This requires the Council to consider the results of public consultation conducted on the review of CPZs, prior to making a decision whether or not to proceed to implementation. This policy sets a minimum threshold for response rates to consultation, as well as requiring at least 51% support for proposals from those who do respond.

4.2 The analysis of the results of the public consultation undertaken indicates a 5% response rate which is below the 10% threshold required. In addition, there was very little support for proposals from those who did respond. While the current Wood Green CPZ conflicts with transport policies as well as the design principles set out in the CPZ policy, priority is given to community views. While the response rate is too low to determine any outcomes, the views expressed suggest that existing arrangements work for residents. As a consequence, no changes are recommended.

5. Alternative options considered

5.1 Consideration was given to formally splitting the Wood Green Inner and Outer CPZ, limiting the use of parking permits to their respective CPZs. While the response to the consultation was low, it is clear that the majority of those who did respond have no desire for change.

6. Background Information

6.1 The Wood Green Controlled Parking Zones (CPZs) were introduced in 1994. The outer zone has been extended several times in response to concerns about parking displacement and the need to prioritise limited kerb space for residents and their visitors. The boundaries of the original Inner CPZ were also reduced during that time.

6.2 In order to protect those who reside closest to the shopping areas and transport hubs, the Wood Green Inner Zone operates for extended hours Monday to Sunday, 8am to 10pm. The outer zone operates Monday to Saturday 8am to 6.30pm. While comprising two separate CPZs with different operational hours, permits are interchangeable between both zones making this by far the largest CPZ in the borough. The full extents of the existing Wood Green Inner and Outer CPZs are shown in **Appendix II.**

6.3 This no longer aligns with the Council's transport policies, which encourages the use of more sustainable modes of transport such as walking and cycling especially for short journeys, which then results in less congestion, improved road safety and air quality. It also conflicts with design principles in the CPZ policy adopted in March 2020.

6.4 In 2016, due to evidence of high parking occupancy levels in the Inner CPZ, as well as the complaints from residents and concerns regarding its extended operational hours, a review was undertaken on splitting this area into three smaller CPZs. The only changes resulting from the public consultation was the inclusion of Warberry Crescent in the Wood Green Inner Zone.

6.5 Since that time, there have been ongoing reported issues of inter zone commuting, and increased pressures in the Inner CPZ, especially near Wood Green and Turnpike Lane transport hubs. There have also been ongoing reports of dissatisfaction with the operational hours of the inner CPZ.

6.6 A petition was received in February 2020 with 18 signatories from residents of Ravenstone Road, requesting a reduction in the Inner CPZ operational times. This related to impacts of those extended operational hours on the over 50s, and their ability to receive visitors.

6.7 Parking surveys were undertaken in February 2020, which indicated that many roads within in the Inner CPZ were subject to high parking occupancy levels. Those surveys also found evidence of high levels of inter zone commuting, putting additional pressures on the busy commercial area.

6.8 In consultation with Ward Councillors, new CPZ proposals were developed and consulted on for the Wood Green area. This involved 5 smaller CPZs, with clear boundary demarcations designed around local communities. This would reduce parking pressures, congestion, supporting walking and cycling and improving air quality. It would also support the commercial area, freeing up more of short-term parking facilities for those visiting local businesses and amenities.

6.9 The proposed names and operational times of the 5 new CPZs are as follows:

- **Bounds Green South CPZ** - Monday to Saturday, 8am to 6.30pm
- **Woodside South CPZ** - Monday to Saturday, 8am to 6.30pm
- **Wood Green Central CPZ** – Monday to Sunday, 8am to 10pm
- **Noel Park CPZ** – Monday to Saturday, 8am to 6.30pm
- **The Ladder CPZ** – Monday to Saturday, 8am to 6.30pm

A drawing showing the full extents of all 5 areas is attached in **Appendix III**

Public Consultation

6.10 The public consultation was carried out over a three-week period starting on 19 July 2021 and concluding on 9 August 2021. The Council followed its usual parking consultation practice which involved delivering a consultation pack including information letters, questionnaire, and an area plan to all registered properties within the consultation area. Street notices were erected in every road being consulted to raise awareness of the parking consultation. Lastly, all consultation material and relevant information was uploaded onto the Council's website with access to an online questionnaire allowing responses to be submitted digitally. The consultation letter and questions are provided in **Appendix IV**.

Responses to Consultation

6.11 Of the 20,792 registered properties that were consulted, the Council received 1039 responses. This represented a response rate of 5%, which is well below the threshold of 10% set out in the Council's CPZ Policy.

6.12 Of the 1039 who responded.

- 26.9% supported the Wood Green CPZs being split into 5 new CPZ areas
- 73.1% did not.
- 85% indicated they are happy with the current operational times
- The remaining 15% preferred it to be changed.

6.13 Further analysis was carried out and the responses were broken down into the proposed 5 new CPZ areas.

Proposed Wood Green Central CPZ area

- 29.1% supported the proposed split into 5 new CPZ areas and 64.4% did not.

- 80.1% indicated that they were happy with the current operational times and 15.1% were not.

Proposed Noel Park CPZ area

- 23% supported the proposed split into 5 new CPZ areas and 68% did not.
- 75.4% indicated that they were happy with the current operational times and 15.2% were not.

Proposed The Ladder CPZ area

- 29.2% supported the proposed split into 5 new CPZ areas and 70.8% did not.
- 83,8% indicated that they were happy with the current operational times and 16.2% were not.

Proposed Bounds Green CPZ area

- 25.6% supported the proposed split into 5 new CPZ areas and 74.4% did not.
- 86% indicated that they were happy with the current operational times and 14% were not.

Proposed Woodside South CPZ area

- 22.6% supported the proposed split into 5 new CPZ areas and 77.4% did not.
- 94% indicated that they were happy with the current operational times and 6% were not.

6.14 A copy of the full analysis report has been attached in **Appendix (V)**

6.15 While the response to consultation is too low to support decision-making, the majority of those who did respond did not support the proposed changes.

7. Contribution to strategic outcomes

7.1 It is important that safe, green travel is available to prevent the borough's roads from being overrun by cars and to support active travel, an ambition the Council has laid out in its Borough Plan and Transport Strategy. Controlled parking zone installation will support the objectives set out in these documents as well as the wider initiatives to improve air quality and support the health of residents, as in the Council's Climate Change Action Plan.

7.2 The introduction of controlled parking is in accordance with Section 3.3.3 of Haringey's Local Implementation Plan part which states:

"The availability of parking is a key determinant of car usage and local traffic congestion which can affect the potential uptake of more sustainable modes of travel. Local parking policy is an important demand management tool in controlling local traffic congestion and influencing choice of transport. CPZs are one of several parking policies, along with low parking standards for new developments, charging, and use of workplace parking levies, which can be used to influence travel behaviour. CPZs specifically prioritise parking for residents and can ease local parking pressures, reduce traffic congestion, improve road safety and encourage the use of more sustainable forms of transport."

7.3 The introduction of CPZs also aligns with the Council's agreed Transport Strategy and supports its 'aims' which include:

- An improved air quality and a reduction in carbon emissions from transport and
- A well-maintained road network that is less congested and safer

Statutory Officers' comments (Director of Finance (procurement), Head of Legal and Governance, Equalities)

8. Finance

8.1 This report seeks Cabinet approval not to make changes to the Wood Green Inner and Outer CPZs.

9. Legal

9.1 Before reaching a decision on whether to make a traffic management order to implement a CPZ scheme, the Council must follow the statutory consultation procedures pursuant to the Road Traffic Regulation Act 1984 (as amended) ("RTRA") and the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 (as amended) ("the Regulations"). All representations received must be properly considered in the light of administrative law principles, human rights law and the relevant statutory powers. Any decision must be taken in accordance with the requirements of the Council's CPZ policy (Appendix I).

9.2 The legal position in relation to traffic management orders and the statutory requirements in respect of consultation are set out in section 9.1 of this report. Public consultation has been undertaken and due consideration given to representations by the public. The recommendations within this report are in line with the requirements of the Council's CPZ policy, therefore the Council should be acting lawfully were it to proceed in compliance with the recommendations in this report.

10. Equality

10.1 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.

10.2 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.

10.3 The proposed decision is to not progress with the proposals at this time due to the response that was received during the public consultation.

10.4 A consultation document and a questionnaire with freepost envelope for returning the questionnaire was distributed to all households and businesses within the consultation area. Street posters were placed in every road consulted and an online version of the consultation material was made available on Haringey's website.

10.5 The questionnaire also asked for disabled bay holders to indicate if they would like for their bays to be converted to a dedicated bay for their specific use only.

11. Use of Appendices

- Appendix I – Controlled Parking Zone Policy
- Appendix II – Map of the Wood Green Inner and Outer CPZs
- Appendix III – Map of the 5 proposed CPZ areas
- Appendix IV – Public consultation letter and questionnaire
- Appendix V - Full consultation analysis report

12. Local Government (Access to Information) Act 1985

Not applicable.

Appendix I – Haringey Parking Policy

Background

A parking and traffic management policy is an important tool which contributes towards wider policy objectives. Such objectives include a less congested road network, improved road safety and a reduction in vehicle emissions, leading to improved air quality for residents.

Better managed kerb space will also benefit Haringey's residents with improved road conditions for walking, cycling and journey times on the local transport network. It also ensures the distribution of allocated disabled parking bays reflecting the necessary requirements within specific parking zones and shopping areas in the borough. The policy ensures the provision of visitor parking facilities to support local business and community groups including those on our local high streets, shopping areas and places of worship.

Controlled Parking Zones (CPZs)

This policy sets out the factors that will considered when determining whether to implement parking restrictions as part of a controlled parking zone ("CPZ") for the first time in the whole or part of the borough.

CPZ Area

The area of the borough where it is intended to implement parking restrictions will be determined by parking stress surveys and expressions of interest received from residents and agreed by Ward Councillors. Parking occupancy of 80% and above would suggest pressure. Residents of roads on the boundary of an area, who may be at risk of displacement if a CPZ is subsequently implemented, will also be consulted on proposals and offered the opportunity of inclusion in the zone.

Consultation

An informal public consultation will be undertaken in addition to the statutory requirements set out in legislation.

Consultation Stages

Stage 1 – Informal Consultation

As part of the design consultation, residents and other stakeholders will be consulted regarding the operational times and days in the form of a questionnaire. This will allow schemes to be tailored to local needs, however these hours need to be limited to a time range that is appropriate for the area and does not fail to take into consideration the effect of attractions such as transport hubs or retail facilities. The minimum operational hours that will be considered are two-hour zones. The operational times proposed will be agreed with Ward Councillors prior to consultation commencing.

The results of the first stage consultation will be considered on an area wide basis, with the collective response of the area determining whether a CPZ is introduced. In order to ensure CPZs are coherent, they need to reflect residents' views, but also reflect the local geography, including neighbouring CPZs, potential future development, nearby areas of parking pressures such as large venues and new housing and business development parking attractors, and the impact on main roads. The implementation area will be finalised following the consultation process taking account of these factors.

While an area may share the same parking problems, its residents may not share the same opinion of controlled parking. A CPZ will therefore be introduced based on the overall response from the area consulted or sub-areas of the consulted area, achieving at least 51% vote in favour of controls unless there are exceptional circumstances, such as a major development planned for the area.

This means that some streets may vote against a CPZ, but if surrounded by roads that support controls, they will be included to ensure that the zone is workable. Where this happens, the rationale will be made available to residents.

If there are roads on the periphery of a proposed controlled parking zone area are not in favour of parking restrictions being implemented, their roads may be removed from the proposed zone where practicable. Part roads will not be included in a CPZ.

Schemes will be progressed where at least 51% of respondents are in favour of proposals. There may be exceptional circumstances where controls need to be implemented in situations where there is less than 51%. These decisions will be taken by the Head of Highways and Parking in consultation with the relevant Cabinet Member and Ward Councillors.

The operational hours of controlled parking zones will be determined by the outcome of consultation. Where the consultation fails to deliver a clear preference, decisions on operational hours will be made in consultation with Ward Councillors. There may be exceptional circumstances where the Council will implement operational hours required to discharge the Council's duties under section 122 of the Road Traffic Regulation Act 1984

The Council should receive a response rate of between 10% and 20% to consultations. A response rate below 10% is deemed inconclusive and a scheme will not be progressed without further engagement with the community and achieving a response rate no less than 10%.

Stage 2 – Detailed Design

This is the formal statutory consultation stage where the proposals are advertised in the local press and notices are placed on lamp posts in the area. The period of consultation is normally 21 days where people can comment on the designs. However, this period is sometimes extended to take in to account public and school holidays. This consultation does not give the option if whether or not a CPZ should be implemented and simply takes account of measures that need to be taken on the highway to give effect to scheme implementation.

Review Stage

The Council will introduce a programme of review of all permanent controlled parking zones. This will involve an assessment of the parking provision within existing zones to ensure it still works for residents, businesses and visitors whilst also encouraging walking, cycling and more sustainable forms of transport for those that need to travel across the borough. The review programme will be developed with the aim that all permanent CPZs are reviewed every 5 years or in response to representations from residents and Ward Councillors. It is recognised that there will be exceptions where the review of more recently implemented CPZs will take priority due to pending developments in the area.

Design principles

The Council's Borough Plan, Transport Strategy and Air Quality Action plan (AQAP) sets out the Council's commitment to improving air quality. Transport is one of the main contributors to poor air quality and as such our controlled parking zones should be designed not only to deter all day parking associated with commuters, but to discourage short trips and encourage walking and cycling.

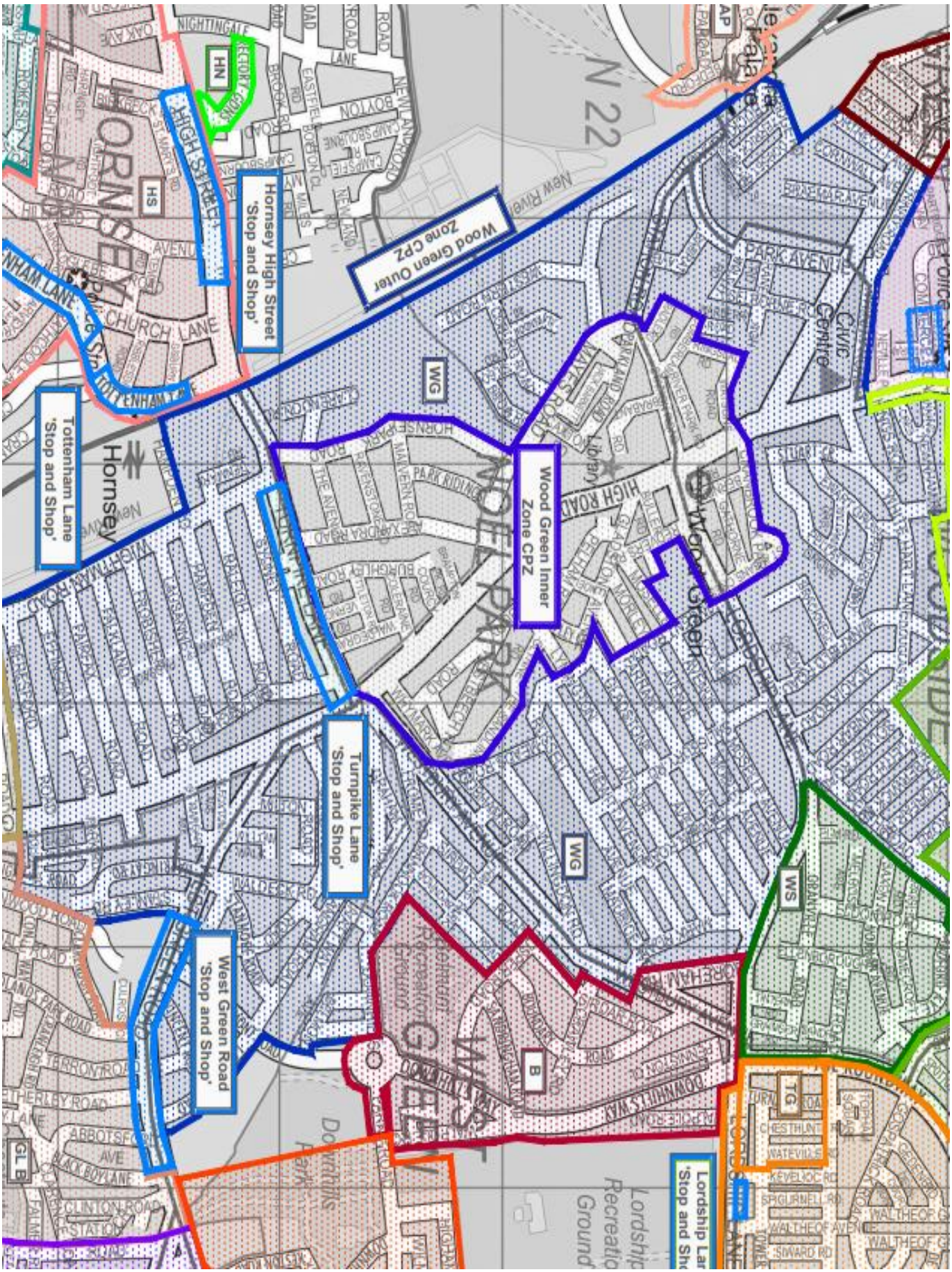
The Traffic Management Act (TMA) 2004 is a key piece of legislation for parking management. The TMA requires that arrangements should be based on the principles of fairness, consistency and transparency. The associated guidance requires authorities to design arrangements with regard to:

- Managing the expeditious movement of traffic,
- Improving the local environment,
- Improving road safety,
- Improving the quality & accessibility of public transport,
- Meeting the needs of disabled people,
- Managing & reconciling the competing demands for kerb space.

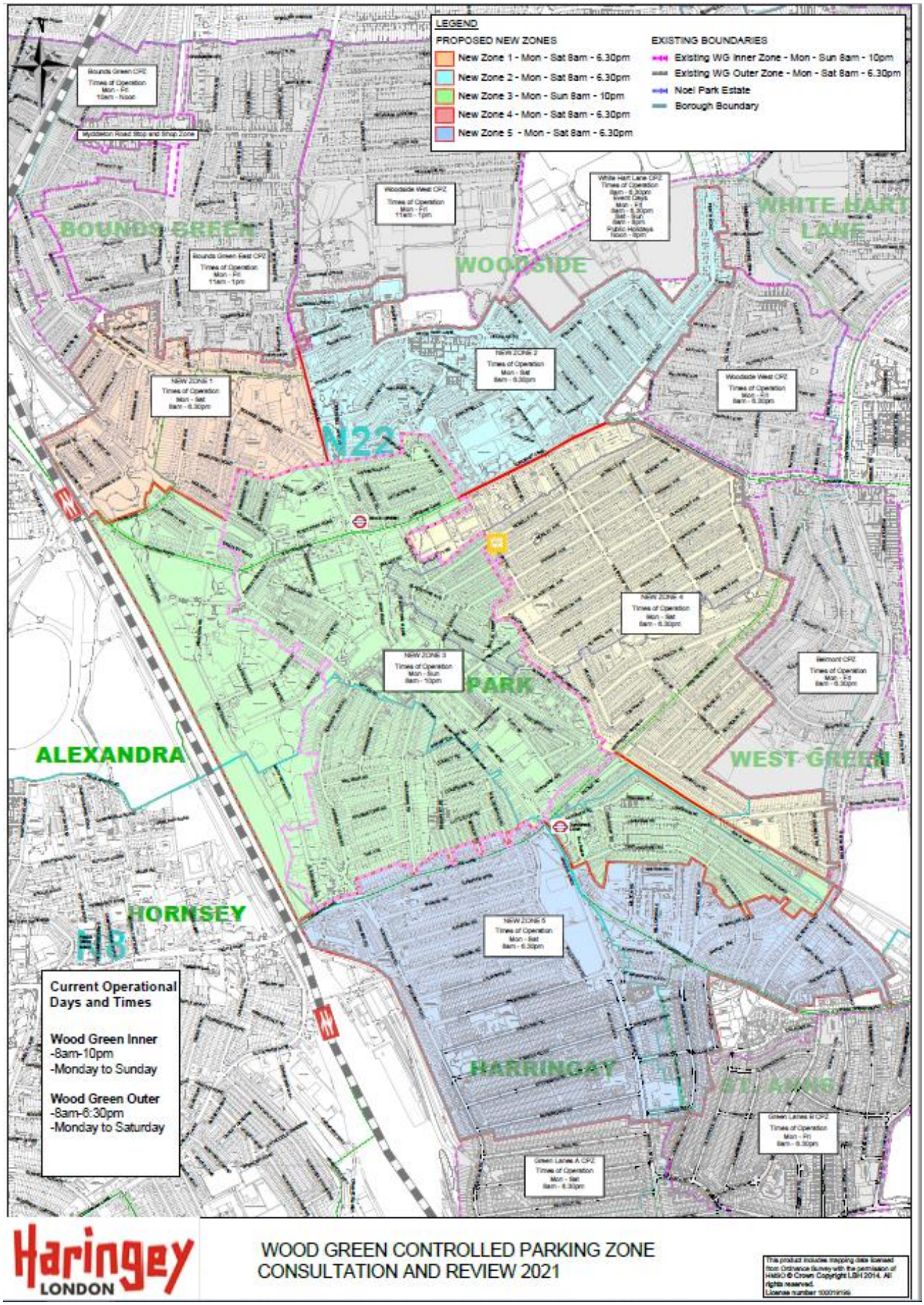
In order to support local business loading restrictions will only be introduced where they are required to maintain road safety and protect against congestion on key routes.

The size of a controlled parking zone should consequently be such that allows residents easy and safe access to parking near their homes but deters short trips and interzone communicating that creates pressures at places of interest such as transport hubs and near retail facilities. It is therefore recommended that where possible a CPZ will not comprise of more than 30 roads as recommended in national guidance.

Appendix II – Map of Wood Green Inner and Outer CPZs



Appendix III – Map of the 5 proposed CPZ areas



Appendix IV – Public consultation letter and questionnaire

19 July 2021

Public consultation for the review of parking controls

Wood Green Inner and Outer Controlled Parking Zones (CPZ)

Introduction

We are writing to ask for your views on the Council's proposals to make changes to the way the Wood Green Inner (Monday-Sunday 8.00am-10pm) and Outer (Monday – Saturday 8.00am-6.30pm) CPZ's operate.

Proposed changes

Our proposals are to completely change the existing CPZ boundaries, with the aim of creating five smaller, tailored parking zones. These new controlled parking areas will keep your existing operational days and times but we want to hear from you if you want to increase the hours. We are not proposing to reduce operational hours as this will lead to increased parking pressures for residents.

The five new CPZ's, replacing the current Inner and Outer zones would be as follows:

- Bounds Green South (area now within Wood Green Outer CPZ)
- Woodside South (area now within Wood Green Outer CPZ)
- Noel Park (area now within Wood Green Outer CPZ)
- The Ladder (area within Wood Green Outer)
- Wood Green Central (area now within Wood Green Inner and Outer CPZ's)

The proposed CPZ boundaries which can be seen on the attached plan, have been arranged using existing CPZ boundaries, information gathered from parking surveys and discussions with your local ward councillors. These new boundaries are closely aligned with local neighbourhoods and their communities.

Currently residents can use their parking permits across the whole of the Wood Green Inner and Outer Zones. This encourages short trips to the underground stations and shopping area to be taken by private cars. The changes we are proposing will mean that you will only be able to use your parking permit to park within your new controlled parking zone once your existing permit expires.

Why we are proposing the change

The large area occupied by the Wood Green Inner and Outer Zone in particular means that residents can use their permit to park across the whole area from Bounds Green to the north to the Ladder Roads area in the south. There are also issues with commuter and other parking near Wood Green and Turnpike Underground Stations, leading to some antisocial behaviours. This is making it more difficult to find parking for residents living close to Wood Green and Turnpike Lane Underground Stations and the High Street shopping areas. This also doesn't align to our Transport Strategy which encourages use of more sustainable modes like walking and cycling especially for short journeys therefore reducing congestion on the roads, and improving road safety and air quality.

Splitting the existing two zones into five smaller zones will help reduce short inter zonal trips undertaken by private cars and making each zone better meet the needs of the local community. These changes will go a long way to improving the local environment for residents, visitors, and all pedestrians using the area. The High Street shopping area will continue to be supported by short term parking and low-cost multi-story car park for those who may still need to drive to shop and for essential loading facilities.

Have your say

We would like to know your views on the proposals we are consulting upon as well as any alternative suggestions or objections you may have to any aspect of the scheme.

Please submit your response to this consultation to reach us no later than 9 August 2021. You can do this via one of the following three options below:

Online: fill in a questionnaire for the Wood Green CPZ review which is found by following this link https://www.haringey.gov.uk/current-parking-consultations

Email: fill in the questionnaire and email it to frontline.consultation@haringey.gov.uk

Post – fill in your paper copy of the questionnaire and return it to us using the Freepost envelope provided.

Please Note: If you are responding on behalf of an organisation only one reply will be accepted. You must give your full postal address when responding to this consultation if you want us to consider your views.

Other changes on offer

To promote the uptake of electric vehicles we are considering new locations to increase the number of electric vehicle charging points/bays available in the borough. If you would like to request an on-street charging point, then please provide your address and the suggested location under Q14 within the questionnaire.

Dedicated disabled parking bays (those that can only be used by one vehicle registration) are one of the benefits being offered by the Council to help residents with severe walking impairments and those residents who cannot travel far to their vehicle. The bays are intended to provide the eligible residents easy access to and from their homes and ensuring there is sufficient room to manoeuvre in and out of their vehicle. For full details on dedicated disabled parking places and how to apply online please visit https://www.haringey.gov.uk/parking-roads-and-travel/parking/dedicated-disabled-parking-bay.

If however you do not have access to the internet, you can request a dedicated disabled parking bay under Q15 within the questionnaire.

What happens next?

Our estimated timeline to progress this project is detailed below.

- July/August: Council Officers will consider your feedback and discuss the outcome of the consultation with your ward councilors.
- August/September: Officers will prepare a report with recommendations which will be submitted for a decision to a key officer in consultation with the relevant Cabinet Member.
- September: We will write to you to update you on the outcome of the consultation and decision. If approved, we can then progress to statutory consultation.

- September/October: Statutory consultation which includes advertising the necessary changes in the local newspapers allowing anyone to object to the proposals.
- November/December: Officers will prepare a second report with recommendations on whether to implement the changes on the street. This decision is likely to be taken by the relevant Cabinet Member.
- December: We will write to you again to inform you if any changes will be implemented and the timeframe for this.

With thanks for your attention, we look forward to hearing from you.

Wood Green Inner and Outer CPZ Review Questionnaire

Q1 **Please tell us your road name and house number**

Personal details will not be published, but we need the information for our analysis. Under the Local Government Access to Information Act 1985, your consultation response will be available for inspection if required; however, your personal details will remain confidential.

Q2 **Which CPZ are you located within?**

☐ Wood Green Inner
Mon – Sun
8am to 10pm

☐ Wood Green Outer
Mon – Sat
8am to 6.30pm

Q3 **Are you a Resident, Business or Residents Group?**

☐ Resident ☐ Business ☐ Community Group

If a Community Group, please provide details and number of registered members

Q4 **Is it difficult to find parking space in your road?**

☐ Yes ☐ No ☐ Sometimes

Q5 **Do you support proposed changes to create five community based CPZs? This will mean that some roads that currently are within Wood Green outer (operational times Monday – Saturday 8.00am-6.30pm) will become part of the new Wood Green Central Zone (Operational times Monday-Sunday 8.00am-10pm)**

☐ Yes ☐ No

Q6 **If you do not support the boundary changes, please explain why.**

Q7 **Are you happy with the current controls? (days and time of operation)**

☐ Yes ☐ No

Q8 **Would longer controls (days and time of operation) help you.**

☐ Yes – Please suggest preferred times below

☐ No – Please explain why

Q9 Do you think that parking pressures are increased (or affected in any way) by events at Tottenham's football stadium (THFC)?

☐ Yes ☐ No

Q10 **If 'Yes' to Q9, would you support the introduction of parking controls on event days?**

☐ Yes ☐ No

Q11 **Do you feel that your street requires short term visitor parking e.g pay to park?**

☐ Yes ☐ No

Q12 **Which (if any) of these parking problems affect your road? Tick any that apply**

☐ Commuter parking ☐ Use of bins to reserve space ☐ Overspill from nearby CPZs

☐ Shop or business staff, customers ☐ Multicar households ☐ Trade / delivery vans

☐ Temporary traffic management schemes ☐ Other, please state below

Q13 **If you would like an electric vehicle charging point (EVCP), please enter your name and address in the space below.**

Q14 **If you are a disabled blue badge owner and want to request a disabled parking bay (general for any badge holder or for your use only) or a disabled bay holder that would like this converted to a Dedicated Disabled Parking Bay (with a unique bay number), please tick the 'yes' box below and enter your name and address. We will then send you an application form**

☐ Yes

If yes, please enter your full name and address

Q15 **Please use this space for any comments**

Appendix V – Full consultation analysis report

Wood Green CPZ Review July – August 2021

Consultation Includes Suggested Changes to Wood Green Controlled Parking Zone

744 (73%) responses were received on paper (freepost), and 281 (27%) responses were submitted online.

Consultation Analysis

Q2 Which CPZ are you located within?

		Count	%
Which Zone?	WG Inner	216	21%
	WG Outer	809	79%
	Total	1025	100%

Q3 Are you a Resident, Business or Residents' Group?

(If a community group, please provide details and numbers or registered members)

		Count	%
Status (Resident / Business / group)	Resident	995	97%
	Business	25	2%
	Community Group	5	0%
	Total	1025	100%

- *St Paul the Apostle RC Church 1200*
- *Three Avenues Residents' Association (TARA) 91 registered members 71 households*
- *Collage Arts is a registered charity (number 1153366), providing educational arts activities*
- *The Haringey over 50s is an advocacy group for people over 50. There are some 200 members.*
- *Not identified*

Q4 Is it difficult to find parking space in your road?

		Which Zone?			
		WG Inner		WG Outer	
		Count	%	Count	%
Is it difficult to find parking space in your road?	Yes	72	33%	109	14%
	No	78	36%	465	58%
	Sometimes	65	30%	233	29%
	Total	215	100%	807	100%

Q5. Do you support the proposed changes to create five community based CPZs? This means that some roads currently within Wood Green Outer (Mon-Sat 8am – 6.30pm) will become part of the enlarged Wood Green Central Zone (Mon-Sun 8am – 10pm)

		Which Zone?			
		WG Inner		WG Outer	
		Count	%	Count	%
Support five community CPZs?	Yes	69	32%	175	22%
	No	147	68%	634	78%
	Total	216	100%	809	100%

Compared with the 2016 consultation on restructuring Wood Green CPZ, it is significant to see that WG Inner Zone respondents are very much less supportive now than they were. Further analysis will explain why, but it is connected with the fact that in 2016, it was proposed to have ***reduced operating times*** in the Inner Zone.

Outer Zone respondents show a significant majority against any change – largely because of what is widely seen as the reduced parking flexibility that would result from splitting up WG Outer Zone into 5 separate small zones.

Given that two previous exercises were conducted with a view to reducing Wood Green CPZs to a more manageable size (compliant with Dept for Transport guidance), it is not unexpected to encounter significant opposition from residents.

Q6a INNER ZONE. If you do not support the boundary changes, please explain why.

- 10pm is too late for those proposed new CPZs and will not help them
- 8am - 10pm is unfair and not necessary as part of your 'Community parking zones'. It's totally biased towards the council
- 8am to 10pm is ridiculous. This is much worse than in the West End
- Adverse effect on visiting and caring for elderly relatives
- Already restrictive enough
- Another attempt to fleece Haringey's hardworking residents. Any time I can't get a space is down to visitors using pay-to-park bays and has nothing to do with residents. My elderly mother also lives on the ladder and a new zone would restrict us. This would cause more congestion I predict.
- Because Sunday is the only day we can have friends and family visitors without needing to buy permits. More importantly, spaces on weekdays are taken up by teachers
- Because this would restrict the size of the zone I can use, and I would not be able to park near my home which would leave me vulnerable if I had to park a long way from home late at night.
- Because we would need to get more VP and it is already very difficult to get VP from the council.
- Broadly support but would like VP available for use in all CPZ areas so we can drive to doctors, large shopping items, laundrette, visit friends etc in other CPZs
- Businesses need flexible parking around the Clarendon Rd industrial estate in the evenings and at weekends.
- Charges are astronomical already for residential parking, and now you want to restrict the area where I can park ...NO, DO NOT SUPPORT THIS.
- Concerned that car owners in the Heartlands supposedly car free development, will be allowed to park if we were all in the same zone.
- CPZs cause enough problems without making it even harder
- Current restrictions more than adequate - and help vulnerable residents by making it easier for carers and family visits
- Division is not done properly. Malvern road area should be smaller and not include the Heartlands new developments.
- DO not agree with expanding the inner zone as I live near a station and parking will be worse

- Family and friends would only be able to park after 10pm and it's not always you have enough VP available
- Far too confusing and Wood Green Inner (central) would be more appropriate running from 8am - 6.30pm.
- Harder for those on boundaries to park.
- I agree on the 5 areas, but the inner should be smaller, not larger than now
- Expanding the Inner zone will only encourage exactly what you are trying to discourage within an expanded central zone. I am concerned that residents of the new developments will be allowed to park on our roads
- I can currently park on side roads when necessary
- I can currently travel freely to my GP etc.
- I have a blue badge to use with two family members with severe disability which I can use anywhere in London. Your proposals would create restrictions for me.
- I have to work in Alexandra House. Sometimes I have to carry bulky equipment and carry it to the office. It is already difficult to park close enough to the office. I also visit some nurseries in inner Wood Green, this will make it difficult to make those visits, which are an essential part of my work
- I live in WG Inner and regularly need to visit my elderly relative in Stuart Crescent. Changes would make this very difficult. I'm happy with current arrangements
- I live on Cumberland Road. I am looking at the proposed parking maps now and this is not good at all. The fact is that when Haringey council workers park up on Ringslade, Cumberland and Warberry roads, we have to drive around to find alternative parking if we can
- I live on the proposed boundary, and it would cost me more to park
- I lost 60% of my business through parking restrictions
- I need to be able to park in all sections of Wood Green Inner and Outer as I am currently able to do. The boundary changes will hinder aspects of my life. I appreciate and have become used to the system as it is now and see no reasons for the change.
- I run a business that operates with the majority of my clients coming after 6:30. My clients need parking but if this comes into action, I will lose clients
- I'm a pensioner and it's disgusting that my family have to pay to get permits to visit me in the evenings. I'm over 80 and need regular visits from family and they struggle to park to help me.
- I'm on the edge of the Outer zone and can have visitors park easily in my area at weekends
- In principle I support the idea as I feel the reduction of people using their cars for short journeys across this area should be discouraged. I don’t however believe the council is doing enough to support the other methods of ensuring people can travel across the borough. The plan states you
- It is not hard to find parking at the moment. Increasing parking times will add greater cost whilst not protecting residents or the environment.
- It seems illogical as The Ladder has shops and cafes open 24/7 so people will want to park. It will be busier. Some of the Ladder area is not even a CPZ. Yet most of Langham Rd is going to be charged until 10 pm when there is nothing going on this end of the road.
- It will be impossible to work from my studio if there are parking restrictions all day Sat/Sunday and until 10 pm at night!
- It would affect local businesses by reducing customers. I have restricted mobility and do not want this
- Many customers park in Woodside / Bounds Green and then get the bus in - or walk in.
- Leave well alone. Appears to be a money-making project. Residents would be restricted
- Most of our customers come from current Inner and Outer zones and changing these into smaller ones will stop many of them from coming here to shop
- Need to move around, that’s the point of a car. Need to visit friends, do heavy item shopping, go to park, late night cash drops into bank, do on the spot shopping or on way home from trips
- New Clarendon devt should NOT be included in WGC CPZ as it's section 106 agreement in which residents are not eligible for permits. **Council is now ignoring this**
- No need and the increase in cost combined with reduced flexibility is of no help to residents in the area
- No need for multiple zones. Council makes enough money already
- Not needed and times too long
- No real purpose or benefit - apart from raising revenue and inconveniencing residents
- Not good value for money. Can't you find better things to do?
- People live here, people work here. How disgusting is it just to make money
- Prefer to keep the current arrangements

- Previously the council promised that it would never take away our right to park anywhere in the whole Inner and Outer Zone area. This goes against that promise. Also Council workers are parking in Ringslade Road from time to time, which has a knock on effect for residents who need to find alter
- Restaurants, shops, and businesses would suffer as a result of these proposed additional restrictions
- The boundary changes suggested will affect aspects of our operations that draw in visitors to the area. For example, visitors to our buildings who use our services and activities, and visitors to our creative studios, particularly in the evenings and weekends. Currently, visitors can park free
- The changes suggested will affect our business (a restaurant and venue) as our main trading hours are in the evenings, Saturdays and during the day on Sundays. Our customers are currently able to park on Coburg Road after 6.30pm and all day on Sundays.
- The inclusion of Harringay Heartlands devt in the new area will put even more pressure on the surrounding roads
- The proposals will cause problems for residents currently on the edge of Inner and Outer zones. Currently, when the roads near us are full, we can park in the next street which is in the Outer zone. This is not an unusual occurrence, especially when many Haringey staff park their cars in our road
- There is no problem with parking currently on my road (N15 3NJ). I object to the assumption that the current proposal will reduce trips to the underground. I live very near the underground and I see no demonstrable benefits to the proposals other than causing hassle to residents and adding to
- These boundary changes are not needed – I find it ridiculous that given the current state of Wood Green, changing parking restrictions is what the council have deemed a priority. - Your whole premise of using this scheme to stop short trips is baseless.
- They do not appear to benefit the residents. If anything, they create more issues. People are still working from home and do not need to make shorter driving trips. The issues that are likely to arise from implementing the changes would lead to added costs on top of the resident's parking permits
- This is a money-making scheme only. It has nothing to do with environment or health
- This is another scheme to raise parking costs and increase revenue
- This is meant to be the cultural quarter. After hours and weekend visitors are especially important. Current parking hours are OK
- This will penalise the poorest by costing residents more. It would not achieve the supposed outcomes re active travel, not least because there are limited and inadequate facilities for cycling. It will affect disabled / elders and young families
- This would have adverse impact on church users
- Very restrictive for small businesses
- We are a working family with baby twins. We need help with childcare from grandparents. This will cost us a lot of money. It feels like this new CPZ is a tax on existing residents and a money-making scheme for the council. Possibly if the back of funds being spent during the pandemic.
- We are opposed to the CPZ parking in our area. We are a working family with young twins who rely on help from friends and family for childcare. The introduction of these extra cost will have a big impact of us and families like us in the road. We already struggle to cover our monthly outgoings.
- We are pensioners who need help form our family. This would not help
- We have family and friends visiting us after 6.30pm. This would be ruined by your scheme
- We object to the inclusion of the Heartlands Development Area being included in the new Wood Green Central CPZ
- We would be prisoners - even on Sundays
- Why should we suffer by paying you more?
- Will not help this road with long hours of 8am - 10pm
- Will limit parking for friends and family
- Will not help residents but will cost us more money.
- Wood Green Central CPZ is too broad. It should not include Turnpike Lane station nor the new builds in Clarendon by St Williams
- Works well as it is - and we all need to think of businesses which depend on parking.
- Would be difficult to go shopping and also difficult to pray at the Mosque
- Would include Heartlands devt. and that would cause problems for Malvern Road.
- Would restrict my parking. This is just a money-making exercise by Haringey council.
- You have included the Clarendon Development within the new boundary. There will be very limited parking on that development. There will be several thousand new residents living there. Many of them will have cars and will park on the nearby streets leading to increased difficulty in parking on o
- You need to present a better case
- You're just using the residents as a cash cow

Q6b OUTER ZONE. If you do not support the boundary changes, please explain why.

Example responses

- Because it's unfair and will cost even more for VP. We have to shell out money for VPs to have service calls to fix things
- Because my area will be reduced
- Because our customers won't come. We already struggle during the day. Your scheme will mean many customers go elsewhere
- Because then my daughter and other family members wouldn't be able to visit on the weekend without permits
- Because this will mean more people looking to park in our zone
- Because vehicles park in Zone , without permits. After 6.30
- because we have elderly relatives in the ladder area who we currently collect freely and take regularly for hospital visits using our car
- Because we are elderly and need to use our car for shopping etc in Wood Green Inner
- Because we could not do any shopping
- Because you are shrinking the CPZ, charging us more for permits and making it difficult for residents to do essential shopping. There is no transport links on Wightman Road so those with mobility issues will rely on their car. We have issues parking due to the works and removal of bays on Wight
- Because you'll be cutting down where I can park by 2/3. Areas have not been thought out.
- Becoming part of WGC will increase cost and inconvenience for our visitors
- Currently have good parking choice.
- Currently my daughter can drive to visit me
- Currently works well. Your proposal is just a money-making scheme
- Cutting off residents in this way is yet another cynical money-raising exercise from parking, which you'll do anyway.
- Cynical money-making exercise, on top of ULEZ intro.
- Cynical money-making scheme
- Cynical move to make more money form what is currently free Sunday parking. We need parkign for visitors etc on Sundays
- Difficult to see friends, attend church etc without being able to park
- Difficult to find spaces already and it means problems when we have visitors as we have arguments with neighbours
- Disruption to childcare, waste of time. Elders and disabled ned to drive for everyday services and essentials
- Do not feel safe walking or using public transport. There is high crime near Duckett's Common (as your customer survey showed) and the permits are very expensive.
- Exploitative way for the council to make money
- Family and friends who live far away come to visit me. For them to pay for longer parking stay could mean that they don't visit me as often.
- Family visits on Sundays so do not support additional controls
- feels like we are being controlled as to when we can have visitors
- Finding anywhere to park in London is stressful majority of the time and the prices charged to park with RingGo etc can be extortionate. Now you want to charge for me to park locally along with increasing the price of the residents parking permit, so less for more.
- I am 76 years old, and my children visit every day after 6pm. Your changes would make it very difficult for us
- I am 89 years old and rely on care from family members. Changing the entire parking structure in the Wood Green Outer Zone because of your declared reasons (i.e. parking permits valid across all current zones, parking at Wood Green and Turnpike Lane stations and alignment with your transport s
- I am able to use my current permit to park in these areas
- I am disabled and my son visits me after 6pm every day and he can park freely.
- I am disabled and need my car to get put and about in all zones. I do not qualify for a blue badge, therefore need resident permit. If you extend, I cannot have my carers and family come and tend my needs because you make it too expensive for me and them. I do not get paid extra to afford the
- I am happy with the current zones. By extending the time will require me to spend more money on visitor permits.

- I have mobility issues and rely on family members in my household to transport me to local health and other appointments in the local area, currently within the Wood Green zone.
- I have seen a dramatic increase in parking tickets in Haringey. The proposed plan will promote the opportunistic nature of increased tickets in the area and reduce movement and already limited parking within the borough. This is an opportunity to charge more parking when crossing into other are
- I haven't seen any evidence that these changes are necessary. You say that there are issues with commuter parking and "other" parking (whatever that means) which lead to some antisocial behaviours but that is very vague and there is no evidence presented to support those claims.
- I live alone and have many health issues. My family needs to visit regularly
- I like the flexibility of being able to park in different parts of Wood Green and see my children as well as friends and community
- I like to be able to drive to and park at my GP surgery in Turnpike Lane
- I would not be able to visit my parents easily. It will affect shops in the area as well
- I would lose carers and friends / family visiting and doing shopping etc.
- I would not be able to park when I go to work in Wood Green town centre. Currently there are no parking issues or problems
- I'd need too many permits. My family don't live in London so when they visit me by car there would be too many restrictions
- I'm a single parent struggling to make ends meet
- I'm disabled and rely on daily care visits at 7am and 7pm. This would cost my carer a lot of money for VP
- I'm disabled and this would make it extremely difficult to have my family and friends visit me
- I'm happy with the current parking timings. The proposed changes will cause me and my family many problems. I do not support any changes.
- I'm in the outer zone and my son's school would then be in a different zone making drop-off and pick-up hard for single parents
- I'm registered disabled - aged 90 and totally dependent on carers and family who don't need more restrictions
- If we are the become part of the new Wood Green Central Zone, it will force the cost onto residents to pay for friends and families to visit them. Aside from the financial cost, this could also affect some residents' mental health if people are unable to visit regularly due to this change.
- If we can't go to the shops in Wood Green, then we will go somewhere else
- If you change the boundaries, it will remove the access local residents have to support businesses in the local community. There are 3 elderly neighbours who are unable to walk to some parts of the borough for recreational purposes and grocery shopping.
- I like the current flexibility and I can visit relatives who have disabilities
- The Bounds Green South CPZ is significantly smaller than the other zones proposed, for no good reason. Why has this zone been shrunk to a pointless area compared to the other outer zones? Haringey seems intent on punishing drivers and a shameless money grab to pay for the new virtual parking
- The change would put Barratt Avenue into the inner zone which would mean extended control hours for our road. This is unnecessary as it is not a problem finding a parking space after 6:30pm or on Sundays. This would be extremely inconvenient and expensive as I have regular visitors including my family
- The changes introduced recently simply increase the cost of parking to generate revenue for the council. It does nothing for helping hard working residents
- The changes will mean the zone operating times will increase from 8am-6.30pm Mon-Sat to 8am-10pm Mon-Sun. Langham Road has never been part of Inner Zone times as it is quite far from the shopping district. This will penalise all residents who used the previous zone operating hours and had guest
- The council is in a difficult financial situation at the moment. I'm sure that the costs of restructuring the CPZ could be better used on more urgent projects.
- The creation of 5 new zones sub-dividing the current two zones will restrict my access to essential local services (GP and dentist) and make my annual payment for a resident's parking permit considerably less value for money.
- The current (since the last zone change) and proposed zones offer absolutely no benefits to anyone other than those right in the centre of the zones. The previous creation of the Belmont zone has caused nothing but endless parking problems on my street, as we are up against the end of the border
- The current arrangement works very well; this is a needless overcomplication.
- The current boundaries are fine as they are. The current system is flexible for visits to other parts of Wood Green e.g. to go to a doctor, Health Centre or vets that is in the Inner Zone without incurring further charges.
- The anti-social behaviours around the stations have nothing to do with parking

- The current changes do not take account of the existing proximity or residents living close to (east of) Wood Green town centre. Under your new proposals, people living south and west of turnpike lane (much further away from Wood Green) are able to park both in Turnpike Lane and Wood Green
- The current CPZ have been working fine for years with no issue. It allows us freedom to park in our own area with peace of mind not worrying or needing to check you are in the right zone when needed.
- The current parking restrictions are absolutely fine. We live and work in the area of Wood Green and by changing the parking zones you will cause extra expenses and nuisance to all of us.
- Why would anybody want a reduction in where a person can park their car in the borough, paying more for less is a very poor business model, but of course you have a captive audience, the residents of the borough, either pay up or get a PCN is your attitude to the people who already pay high rates

Q7. Are you happy with the current operating days and times?

	Which Zone?			
	WG Inner		WG Outer	
	Count	%	Count	%
Yes	173	80%	691	86%
No - Please explain why	42	20%	117	14%
Total	215	100%	808	100%

If not, please explain why

WG Outer	*A shorter period of operation (say 11am to 2pm) would work well.*
WG Outer	*A shorter period of operation would work fine in this road, e.g. 10am to 12 Noon*
WG Outer	*Because commercial vehicles park after 6.30*
WG Outer	*better as one big zone*
WG Outer	*Having 8-6.30 means you have to waste a 1-hour permit for the last 30 mins*
WG Inner	*I accept them, but I still think they are too harsh. 9-5.30 would be fairer*
WG Inner	*I am elderly disabled live alone and depend on Carers and family to visit*
WG Outer	*I am happy with the area of controls but not the times. Times are to long*
WG Inner	*I can park in Central London on Sundays and after 6pm but not in Wood Green.*
WG Outer	*I do not think a CPZ is actually necessary where we live*
WG Outer	*I don't think there should be controls on Saturdays.*
WG Outer	*I think it should be from 9 - 5.30 in the outer zone*
WG Outer	*I think outer zone should even have free parking on Saturdays and Sundays*
WG Outer	*I think that operational hours could be reduced to exclude Saturdays.*
WG Outer	*I would like 2hr restrictions as in Crouch End and Highgate.*
WG Outer	*I would like 2-hour parking restrictions in the current outer zones*
WG Outer	*I would like parking restrictions to be extended to Sundays.*
WG Outer	*It is a con. The parking permits started off cheap then doubled and doubled again*
WG Inner	*It should be 24hr resident parking not 8am-10pm.*
WG Outer	*It's absurd to have parking controls on weekends and past 6:30pm*
WG Inner	*I've explained above, people live and work here. Stop placing these restrictions!*
WG Outer	*Most people & their visitors do not have unlimited funds to spend on parking.*
WG Outer	*On Ravenstone Road, the restrictions are 8am to 10pm, 7 days a week. A shame.*
WG Outer	*Please reduce hours to 10am - 12 to allow for Heath visitors family and friends*
WG Inner	*Prefer it to only 8pm*
WG Outer	*Prefer to have no restrictions at all, but current rules preferred to your new proposal*
WG Outer	*Prefer like Bounds Green CPZ Monday to Friday: 10am to 12 noon*
WG Outer	*Preferred it when it was all one zone, but the current arrangement is way better*
WG Outer	*Restricted hours are too long. Shorter hours would still deter lengthy parking.*
WG Outer	*Saturdays should be free*
WG Outer	*Sometimes difficult to find parking space on Sunday,*
WG Outer	*Sunday should not included*
WG Outer	*The hours are far too long to just prevent commuter traffic. Just have 10-4pm*
WG Outer	*The inner zone times are far too long. Why 10pm? Outer zone should be just 1 hour*
WG Outer	*The parking times are too intrusive and disproportionate*

WG Inner	*The restrictions around Wood Green Inner are some of the strictest in London*
WG Outer	*The times are ridiculous. It should be Monday to Friday 9am-5pm*
WG Outer	*The use of cars for short journeys across the borough should not be encouraged*
WG Outer	*The zones are too big so encourage people to drive short distances*
WG Outer	*There should be no controls whatsoever - any decent person would realise this.*
WG Outer	*Pressure on parking on Sundays and after 6.30pm due to Albanian cafes.*
WG Outer	*They are far too strict. Lots of space on our road, so visitors should park for free*
WG Outer	*They are longer than needed in my opinion.*
WG Outer	*Not enforced fully, vehicles routinely block the road and park in restricted bays.*
WG Inner	*They are too long. 8am to 10pm seven days a week just doesn't make sense*
WG Outer	*We have cars parking in front of our drive most evenings and on Sunday.*
WG Outer	*We need the restrictions to be extended to Sundays*
WG Inner	*Would prefer shorter hours over weekend*

Q8 Would longer controls (days and times of operation) help you?

		Which Zone?			
		WG Inner		WG Outer	
		Count	%	Count	%
Would longer controls (days and times) help?	Yes	18	8%	110	14%
	No	196	92%	692	86%
	Total	214	100%	802	100%

Q9 Do you think that parking pressures are increased (or affected in any way) by events at Tottenham's football stadium (THFC)?

		Which Zone?			
		WG Inner		WG Outer	
		Count	%	Count	%
Do you think parking is affected by THFC events?	Yes	36	17%	81	10%
	No	180	83%	728	90%
	Total	216	100%	809	100%

Q10 If yes to Q9 would you support the the introduction of parking controls on event days?

		Which Zone?			
		WG Inner		WG Outer	
		Count	%	Count	%
If 'Yes' to Q9, would you support event day restrictions?	Yes	33	15%	69	9%
	No	3	1%	16	2%
	N/a	180	83%	724	89%
	Total	216	100%	809	100%

Q11. Does your street require short term visitor parking?

		Which Zone?	
		WG Inner	WG Outer
		Count	Count
Does your street require short term visitor parking?	Yes	64	179
	No	119	558
	Already have enough	33	72
	Total	216	809

Q 12 Which (if any) of these parking problems affect your road? Tick any that apply.

	Which Zone?					
	WG Outer		WG Inner		Total	
	Count	%	Count	%	Count	%
Commuter parking	99	13%	55	26%	154	16%
Overspill from nearby CPZs	76	10%	42	20%	118	12%
Shop or business staff / customers	104	13%	64	30%	168	17%
Multicar households	195	25%	48	23%	243	24%
N/A no problems	335	43%	62	29%	397	40%
Use of bins to reserve spaces	104	13%	37	17%	141	14%
Trade / delivery vans	125	16%	42	20%	167	17%
Other non-local	34	4%	12	6%	46	5%
Temporary traffic mgmt schemes	53	7%	27	13%	80	8%
Other problems	114	15%	38	18%	152	15%

Many respondents say they have no parking problems. However, the main parking problem identified by Outer Zone respondents is that of multicar properties. Parking by shop /business staff and customers is more of a problem for Inner Zone residents.

Multicar households are now a significant problem across the Borough. In part this results from the increase in numbers of homes in multiple occupancy (HMOs), but also by many individual households having more than one vehicle.

Commuter parking remains a significant issue for Inner Zone respondents, and some comment that if Turnpike Lane station were to be included within an enlarged Inner zone, it could make commuter parking more of a problem.

Q 12 Other problems identified by Residents

- A church on the corner of the road can attract anti-social parking activity and this should be discouraged/ parking spaces closer to the church which could be pay to park spaces might assist.
- A lot of parkign is for the community Mosque. This adds to congestion and makes it difficult to receive deliveries - and to park
- A nearby house has 3 vans and 3 cars and they use stickers to obscure number plates as well as putting bins in front of them. NOTHING is ever done about it
- Abuse of blue badges - Residents think there is 'leakage' of these, and the council needs to be more vigilant about this

- Abuse of DBs and blue badges by able-bodied drivers
- Abuse of the Blue Badge scheme by local young male tenants from multi occupancy houses using labourer vans with no obvious need for a badge.
- Already too much pay-to-park means there are few spaces near my flat
- Antisocial behaviour on the street evening and overnight with mass gatherings of riff raff.
- As mentioned earlier, the only parking issue we've had on this street was because Haringey Council thought it was a good idea to (without consultation) take away half of the parking on our street.
- Bike shelters that take up space that could be otherwise used for parking. Disabled spaces given to residents, who then leave or have passed away and other residents are now no longer able to use
- Blue badge abuse
- Blue badge abuse by non-disabled people
- builder's lorry parked on the night (out from working hours) for free
- Building workers on Evergreen currently use up all spaces. We were told at the planning stage that this wouldn't happen
- Churches and mosques attract a lot of extraneous parking
- Concerned about what appears to be a lack of enforcement
- Constant stream of learner drivers practicing in bays, sometimes 4 or 5 are manoeuvring here
- Council and bus depot staff parking in the road
- Council employees persistently flouting the instruction that they MUST NOT park on roads near the council offices using Borough-Wide or Essential Service permits!!!
- Council employees regularly parking on our road when they know they shouldn't
- Council planning policy allowing conversions of houses into HMOs is creating parking problems - including the issue of residential business vehicles.
- Council worker parking in and around local streets
- Council workers using permits.
- CPZ is not clearly signed ...No one knows what zone we are in Parking attendants don't know either ! I would be surprised if Anne Cunningham even knew
- Cumberland, Ringslade and Warberry road always have parking congestion day and night. Cumberland Road is used a lot by council workers for parking
- Despite Leverton Close (at top of Ringslade) being a car free development, you have issued permits to some residents which means there is sometimes no available space for authorised residents.
- Don’t understand Q11 I already pay for visitors parkign with VP
- Uber and minicabs blocking up the place by Turnpike Lane tube. Your intro spiel bangs on about commuters causing problems parking by the tube. this is total nonsense. It is the cabs
- Generally it would help if there were more pay-to-park bays available on the street during the day and on Saturdays.
- Green Lanes restaurant customers
- Haringey Council Employees fill all the residents places all day long. When I take my Special Needs Child to school every morning, (which I do in order to not add pressure on Haringey Council's services)
- Haringey council employees with 'essential work permits' parking on Barratt Ave
- Haringey council staff and facilities vans parking for long periods well in excess of the 2 hours allowed
- High volume of parents / carers parking outside often on DYL, zig zags and close to junctions.
- High volume of through traffic and lack of cycle lanes
- HMOs with multicars are a growing problem
- Houses divided into flats increases car ownership. Cars squeezing into too-small spaces
- I don’t live in Tottenham so unsure about Q9
- I live opposite a school, so the teachers do park here but it's not a problem. The road gets busier at school pick up and drop off, but again I don't think it's a problem as it's never too busy.
- I live opposite Wood Green Crown Court which has a lot of extraneous parking including cars with blue badges but driven by non-disabled.
- Inconsiderate parking takes up excessive space
- Inefficient parking, and blue badge abuse
- It is my understanding that residents of the tower blocks opposite Northcott Avenue are able to park in our road. If this is correct it could be contributing to pressures on parking and would be b
- Likely that Heartlands Devt residents will be given permission to park. It has very little parking of its own.
- Limited access to VP makes it a problem for family visitors
- Lots of council staff using ESPs whenever the offices are open on Station Road
- Lots of flats now on the road so more cars per household than in other nearby roads

- New development behind my house (Colina Mews), all the construction workers have visitors, permit and have been parking on Haringey road, which had major impact on my road.
- New flats building devt. 'Evergreen' ("forever green lanes")
- Often taxis and internet delivery vans park at the bottom of the road and throw away their litter after eating their lunch
- One multi vehicle family covers number plates with stickers and puts out traffic cones. CEOs do nothing
- the amount of minicabs parked at Turnpike Lane station without any interference from parking attendants
- Too many driving instructor cars parked waiting for next pupil (Berners, Gathorne, St Albans Cres)
- Too many trade vans and SUVs taking up excessive space. Also a lot of trees have been removed and not replaced
- Too many unauthorised blue badges in use. Many drivers use them to park and go to the shops
- Trade / internet delivery vans park overnight
- Why make people life bad in Haringey, business will be bad if people do not get to travel around. Please leave the parking as it is and fix the roads.
- Wightman Road is a mess. The new system hasn't made things better. One of the windy bits is right near my bedroom window. I hear people honking their horns at all hour during the day.
- Worst problem is households who leave / abandon various cars, trailers etc full of junk for months at a time
- You have reduced the number of parking bays in Wightman Rd and taken away parking on my side after I had just bought an electric car.

Views by Road on the proposal for 5 Community Parking Zones.

A Wood Green Inner

Percentages read across >

		Support five community CPZs?			
		Yes		No	
		Count	Row %	Count	Row %
WG Inner	Acacia Rd	0	0%	2	100%
	Alexandra Rd	4	31%	9	69%
	Boundary Rd	0	0%	1	100%
	Bounds Green Rd	1	50%	1	50%
	Bracknell Cl	1	100%	0	0%
	Bradley Rd	3	50%	3	50%
	Brampton Park Rd	2	67%	1	33%
	Burghley Rd	3	75%	1	25%
	Clarendon Rd	0	0%	2	100%
	Coburg Rd	1	14%	6	86%
	Coleraine Rd	1	33%	2	67%
	Courcy Rd	1	50%	1	50%
	Cranbrook Park	3	60%	2	40%
	Cumberland Rd	1	33%	2	67%
	Darwin Rd	1	100%	0	0%
	Ewart Grove	0	0%	2	100%
	Farrant Ave	1	25%	3	75%

	Frobisher Rd	0	0%	1	100%
	Frome Rd	0	0%	1	100%
	Gathorne Rd	1	25%	3	75%
	Gladstone Ave	1	8%	11	92%
	High Road	3	21%	11	79%
	Hornsey Park Rd	4	44%	5	56%
	Langham Rd	1	17%	5	83%
	Leverton Cl	1	50%	1	50%
	Lordship Lane	0	0%	3	100%
	Lymington Ave	1	100%	0	0%
	Lyttleton Rd	1	50%	1	50%
	Malvern Rd	3	27%	8	73%
	Mayes Rd	2	33%	4	67%
	Milton Rd	1	100%	0	0%
	Morley Ave	0	0%	2	100%
	Moselle Ave	2	40%	3	60%
	Noel Park Rd	2	100%	0	0%
	Park Ridings	0	0%	2	100%
	Parkland Rd	1	50%	1	50%
	Pelham Rd	1	25%	3	75%
	Pellatt Grove	1	100%	0	0%
	Ravenstone Rd	2	33%	4	67%
	Ringslade Rd	1	25%	3	75%
	River Park Rd	0	0%	1	100%
	St Albans Cres	1	50%	1	50%
	Stuart Crescent	1	50%	1	50%
	The Avenue	0	0%	3	100%
	The Shandling's	2	33%	4	67%
	Tower Terrace	0	0%	4	100%
	Waldegrave Rd	0	0%	2	100%
	Warberry Rd	2	29%	5	71%
	West Green Rd	1	50%	1	50%
	Westbeech Rd	4	40%	6	60%
	White Hart Lane	0	0%	2	100%
	Whymark Ave	1	20%	4	80%
	Not stated	5	63%	3	38%
	Total	69	32%	147	68%

Views by Road on the proposal for 5 Community Parking Zones.

B. Wood Green Outer

Percentages read across >

		Support five community CPZs?			
		Yes		No	
		Count	Row %	Count	Row %
WG Outer	Acacia Rd	1	20%	4	80%
	Barratt Ave	2	22%	7	78%
	Belmont Ave	1	17%	5	83%
	Beresford Rd	2	15%	11	85%
	Berwick Rd	1	50%	1	50%
	Boundary Rd	5	25%	15	75%
	Bounds Green Rd	1	33%	2	67%
	Bracknell Cl	1	20%	4	80%
	Braemar Ave	1	9%	10	91%
	Bridge Rd	1	33%	2	67%
	Buckingham Rd	2	50%	2	50%
	Burghley Rd	1	100%	0	0%
	Canning Cres	1	17%	5	83%
	Carlingford Rd	2	8%	22	92%
	Caversham Rd	0	0%	2	100%
	Cobham Rd	0	0%	3	100%
	Colina Rd	1	50%	1	50%
	Coombe Rd	0	0%	2	100%
	Cornwall Ave	3	25%	9	75%
	Crescent Rd	3	75%	1	25%
	Crossfield Rd	2	40%	3	60%
	Darwin Rd	0	0%	2	100%
	Dorset Rd	1	14%	6	86%
	Douglas Rd	0	0%	4	100%
	Downhills Park Rd	1	17%	5	83%
	Dunbar Rd	3	43%	4	57%
	Effingham Rd	6	43%	8	57%
	Ewart Grove	0	0%	5	100%
	Fairfax Rd	0	0%	11	100%
	Falkland Rd	8	44%	10	56%
	Farrant Ave	1	10%	9	90%
	Finsbury Rd	0	0%	1	100%
	Forfar Rd	0	0%	2	100%
	Frobisher Rd	2	40%	3	60%

	Frome Rd	0	0%	1	100%
	Gladstone Ave	7	33%	14	67%
	Gospatrick Rd	0	0%	1	100%
	Graham Rd	1	8%	11	92%
	Green Lanes	1	17%	5	83%
	Hampden Rd	1	9%	10	91%
	Harringay Gdns	1	50%	1	50%
	Harringay Rd	2	22%	7	78%
	Hewitt Ave	0	0%	16	100%
	Ivatt Way	1	33%	2	67%
	Kings Rd	2	50%	2	50%
	Lakefield Rd	0	0%	1	100%
	Langham Rd	13	25%	40	75%
	Lausanne Rd	6	50%	6	50%
	Leith Rd	3	27%	8	73%
	Linden Rd	0	0%	5	100%
	Lordship Lane	0	0%	5	100%
	Lymington Ave	3	23%	10	77%
	Mannock Rd	3	27%	8	73%
	Mark Rd	1	33%	2	67%
	Maurice Ave	1	10%	9	90%
	Milton Rd	3	33%	6	67%
	Morley Ave	6	50%	6	50%
	Moselle Ave	6	38%	10	63%
	Northcott Ave	3	38%	5	63%
	Park Ave	1	9%	10	91%
	Park Rd	0	0%	2	100%
	Partridge Way (HfH)	2	67%	1	33%
	Pelham Rd	0	0%	1	100%
	Pellatt Grove	3	30%	7	70%
	Perth Rd	0	0%	17	100%
	Progress Way	0	0%	7	100%
	Raleigh Rd	2	18%	9	82%
	Ranelagh Rd	0	0%	2	100%
	Russell Ave	6	23%	20	77%
	Salisbury Rd	0	0%	7	100%
	Selborne Rd	3	23%	10	77%
	Sirdar Rd	2	17%	10	83%
	Solway Rd	3	43%	4	57%
	St Margaret's Ave	0	0%	1	100%
	St Michael's Terrace	0	0%	3	100%

	Stanmore Rd	1	9%	10	91%
	Station Rd	3	38%	5	63%
	Stirling Rd	1	8%	11	92%
	Stuart Cres	0	0%	1	100%
	Sydney Rd	6	38%	10	63%
	Terrick Rd	0	0%	1	100%
	The Sandlings	0	0%	1	100%
	Trinity Rd	0	0%	1	100%
	Turnpike Lane	3	43%	4	57%
	Trinity Rd	0	0%	0	0%
	Vincent Rd	2	20%	8	80%
	Waldeck Rd	0	0%	6	100%
	West Green Rd	0	0%	5	100%
	Westbury Ave	2	18%	9	82%
	White Hart Lane	1	17%	5	83%
	Wightman Rd	4	36%	7	64%
	Wiliams Grove	0	0%	1	100%
	Willingdon Rd	2	14%	12	86%
	Willoughby Rd	1	20%	4	80%
	Winkfield Rd	1	50%	1	50%
	Not stated	9	16%	48	84%
	Total	175	22%	633	78%

Q15 Any Comments

Which Zone?	Support five community CPZs?	Comments
WG Inner	No	..thi sis money for your coffers so you can pay even more to your executives. Nothing for common people but you wealthy earners are greedy and enjoy having your feet on our backs. Like the mayor and Prime Minister, you are running life for the rich and ignoring poor people. You should be ashamed of yourselves but I have little doubt that this will fall on deaf ears and you enjoy treating us like dirt
WG Inner	Yes	Am very concerned about residents of the new Haringey Heartlands development adding significantly to local traffic and taking up a lot of parking spaces
WG Inner	No	Another unnecessary money-grabbing initiative. I'd prefer to pay to park int he Mall rather than be restricted by more zones. This attempt will damage local businesses by stopping many WG residents from parking to shop in Green Lanes. What about people WFH? I hope there are enough objections to stop this. If not I will shop in Walthamstow where parking is much cheaper and easier.
WG Inner	No	Arrangements are already strict enough. Elderly people could lose visitors and become more isolated. As a health professional your proposal would mean I and colleagues would take longer to travel by public transport and would not be able to see as many people
WG Inner	No	As a business, the main problem is being ticketed all the time on River Park Road. A few business parking bays on this road would help everyone at Blue House Yard
WG Inner	No	As for first comment: Unfair, discriminates in boundary line and against poorer, elderly and disabled when 7 days a week until 10 pm is proposed. If you cannot get out, you rely on others visiting. The Ladder area is generally more expensive housing, don't you want to upset the people who own there? Otherwise, I can't see why they don't have extended hours and Sundays. There are more extended opening hours nearby there so people will have problem parking as non resident and visitors more likely- I would think - Park in N8 ladder
WG Inner	No	As my local area is often fully parked, I need to park in adjacent areas, so your proposals would make this difficult. The current arrangements have useful flexibility
WG Inner	No	Blue badge use would be reduced to the 'central zone'. A family member has severe mobility and autism and you proposals would restrict my ability to take the family member to places and appointments. I agree with traffic reduction and more walking for those who can. Some can;t walk any distance and therefore what you are proposing is ill-considered in the name of 'being healthy'.
WG Inner	No	Change blue badge display system to a virtual one to stop cars being broken into to steal them. Inner zone should be reduced, not expanded
WG Inner	No	Can you please reinstate 2-hour VP vouchers. Can you also allow me to purchase them at council offices rather than being forced to do this online. There is a problem with council workers parking locally during the day and, mysteriously, they seem to have residents' parking permits. Drug dealers park on the corner of local roads and sometimes park in the middle of the road to do their transactions. Fly tipping is a constant problem
WG Inner	Yes	Can't understand why we can’t park in the pay-to -park bays at certain times even though these bays are not heavily used.
WG Inner	Yes	Cars (including blue badges) stop and wait on the corner of Moselle with Redvers. This obstructs the buses

WG Inner	No	Changes would make it very difficult because of your restricted and difficult VP system. I need to visit elderly relatives and you would not allow me to have two permits - one for my own and another for my family members' road. Current controls go to 10pm and this helps stop people parkign in Wood Green High Road int eh evenings. Keep it how it is.
WG Inner	No	Commuters come with overspill and this would become much more of a problem with your proposal. Would there be an option to buy an Inner and an Outer permit? Now that permit prices are going up again, what would I get for my money?
WG Inner	No	Council is ignoring a Section 106 agreement and allowing parking for Clarendon residents.. Your proposals are not backed up with clear argument or evidence
WG Inner	Yes	Cumberland Rd is used by so many council workers, traffic wardens, Haringey council vehicles and staff. If we go out, it is always difficult to find space when we return. This extraneous parkign should be stopped immediately. CVEOs know that council staff cause parking congestion, but they do nothing about it. Who is issuing council staff with all these permits and scratch cards? CEOS also take no action over blue badge abuse. There needs to be a radical shake up of parking enforcement. You're quick to increase parking charges but do nothing to deal with council vans and staff parking - which makes our lives hell.
WG Inner	No	Current arrangement is good. I think 10pm is a bit too late - especially when having a family visit
WG Inner	No	Current flexibility encourages revival of Shopping City along with other Wood Green shops and services. Excessive and expensive parkign restrictions means that more stores will lose customers and close. Friends in neighbouring boroughs often complain to us that parkign charges are much more expensive in Haringey. SORT IT OUT.
WG Inner	Yes	Currently, parking is quite difficult and restricts my family visiting me. I tend to use the bus for local journeys
WG Inner	Yes	Do businesses also get consulted?
WG Inner	Yes	EVCPs need to be rolled out to increase use of electric cars
WG Inner	No	Extended hours would make it a nightmare for family and friends who can visit me freely in the evenings and on Sundays. No need for longer hours as local businesses mostly shut by 6.30 and no justification for including Sunday. Please stop this.
WG Inner	No	First of all, it must be a huge undertaking and you're not going to make everyone happy. In saying that, I must say, the consultation is very disappointing as far as Ho50s member, Avis, who lives on Ravenstone Road, is concerned. She and I have talked at length about this even in the last few weeks. First all it does nothing to address her concerns about a reduction in hours. Now, Andrew, you did tell me this on the phone when we talked, but it's disappointing that there is not one thing on the form to address this. Avis and I were told time and time again that there will be a consultation, wait for the consultation. Well, we waited, and waited for what. There's nowhere to address that issue. Nobody has really addressed why her road has the harshest parking restrictions in the entire borough. All any one can say is that it's close to the high street.
WG Inner	Yes	Haringey permit prices now higher than other boroughs. You should have an app for visitor parking instead of the paper permits which take long to arrive
WG Inner	No	Haringey should follow other boroughs which allow 20 minutes or more free parkign according to location
WG Inner	Yes	Having controls 7 days a week up to 10pm is a nightmare because it prevents friends and family visits. I have lived here many years and would like it changed to a reasonable time
WG Inner	No	HOMES FOR HARINGEY - see detailed comments #140
WG Inner	No	I am hugely opposed to this scheme as I feel it is a tax on residents and their visitors. It will in no way benefit us. It feels distinctly like a money making scheme from the council.

WG Inner	Yes	I don’t know about Tottenham as I don't live in that area. We already have enough pay-to-park bays
WG Inner	No	I don't think you will listen to us. You've already decided what you are going to do.
WG Inner	No	I go to W1 and SW6 and I find it easier to park there - and weekends it's free
WG Inner	Yes	I have a Blue Badge, but don’t drive or own a car. I live alone. My family and other Carers come to care for me daily. Family take me by car to appointments or wherever I need to go. They can’t park here easily at all. I can only buy visitor badges in batches of 9. I can’t get a Blue Badge Companion residents badge as I don’t own a car and my family members live outside Haringey so they can’t get one either. No provision has been made for elderly disabled in my situation. I have lived here for 54 years and the parking has got so bad, people can’t visit me anymore.
WG Inner	Yes	I have off street parkign and don’t usually drive. I do however support the stated objectives of discouraging short car journeys for sustainability reasons
WG Inner	No	I no longer trust or believe your so-called parking consultations. These are nothing more than a scam.
WG Inner	No	I received a letter today about making permits paperless. This will cause more problems for residents. Why change the familiar way. Also we won’t know who is parked illegally on the road.
WG Inner	No	I spend £00s a year on VP and this is unfair. If there was some concession for residents' visitors I would be more supportive of the changes. I pay £3 for every VP for evenings and weekends and this would be even more if controls were extended. You need to balance traffic issues against residents' rights to have visitors
WG Inner	No	I understand the benefits of a CPZ but the 8am to 6.30 pm is quite enough. No extra time needed as shops are closed by 6.30pm. This has restricted my son visiting me as well as friends because of limited access to VP. Please consider residents and change hours to 8am to 6.30pm ONLY
WG Inner	No	I want assurance that the car free Heartlands Development would NOT BE ALLOWED TO PARK IN EXISTING LOCAL ROADS IN WG INNER. If the agreement is dropped, there will be 2000 new residents parking on our streets
WG Inner	Yes	I would prefer reduced times of 8.30am - 5.30pm Mon - Sun
WG Inner	No	I'm a residential permit holder and frequently find council employees flaunting parking rules for themselves when we residents pay through the nose for these services ,and now the UNJUST ULEZ coming has forced me to sell my car ,because of supposedly global warming, RUBBISH ,ITS A TAX ON THE CAR OWNER WHILE THE MAYOR GETS DRIVEN IN HIS 5LITRE RANGE ROVER , DISGUSTING ,HYPOCRITES
WG Inner	Yes	I'm certainly in favour of reducing intra-zonal car trips
WG Inner	No	I'm concerned that the new flats will increase parking congestion on Mayes Rd. Also, HGVs use the road to get to the shops and other businesses. They start driving in at 6am
WG Inner	No	I'm disappointed in the council's attitude to local residents. There is no care or road improvements, only ways of increasing revenue. I feel that the council is run as a profit organisation instead of as a local service for residents and taxpayers
WG Inner	No	If I can have a free DB it will help as family members come 3-5 times a week to help with care duties and if I can have a DB, they can park in my drive. Please liaise with family. Thanks.
WG Inner	No	If people can park freely now it could be that a large cluster of has to park in a specific small zone if your proposals were put in. Would costs of parking in smaller zones be reduced?
WG Inner	No	If the proposals go ahead there should be some sort of discount on visitors parking, and less restriction on the allocation of visitor permits
WG Inner	No	In summary we are happy with the current restrictions in place on our road, we do not have problems finding space. We are not happy about the proposed zones as this will make it difficult for us to go to the outer Wood Green zones in order to help us with our shopping

WG Inner	No	Irrespective of what we say, you'll just go ahead with these proposals. Expanding WG Inner is just a way to generate more money. Monday - Sunday up to 10pm is disgusting and should never have been allowed. I reject this proposal
WG Inner	No	It is horrible what you are proposing. Why are not you sorting the problem introduced by the new developments why St Williams ? Why are not any improvements to improve pedestrian and cycle routes in the area? Can you really feel proud of the job you are doing? Shame on you!
WG Inner	No	It would be madness to incorporate Haringey Heartlands into the CPZ. Malvern Road is nearest to the development and would be overwhelmed - leaving no space for residents. One household already parks vans and cars which take up residential space. In one instance the family came out and caused a Haringey council removal truck to retreat from removing a car. The enforcement officers tell me that the council does nothing about this.
WG Inner	Yes	It would be good to introduce additional electric charging points and bike hangers to encourage sustainable methods of transport.
WG Inner	No	It's a capitalist money grab. There should be free resident and visitor parking on Sundays
WG Inner	No	It's disgusting that Haringey continues to make life even harder for its residents. Please leave us alone
WG Inner	No	Long hours hinder visits from family and friends
WG Inner	No	Many pay-to-park spaces mean the public can park here but there is a lack of space for residents. My visitors have trouble parkign even to pick me up. Service and delivery calls also have trouble finding parking near me and I hope they don't get tickets. Residents have a raw deal putting up with non local parkers. We have to use VP up to 10pm and on Sundays. This does not help residents and your plan would make it worse
WG Inner	No	Market stalls have always made it difficult to park - with 100s of people in the road.
WG Inner	Yes	Mayes Rd is congested and many cars have tickets stuck to their windows for a couple of weeks.
WG Inner	Yes	More cycle parking needed and some provision for cyclists on Wood Green High Road
WG Inner	No	More cycle storage, LTN's, better defined cycle lanes required. Increased areas blocked off for school drop offs. And then being enforced. The proposed change to only have 2 visitor permits being allowed to be used concurrently I don't agree with. If I have friends family to see me we can only invite two households at once! I can't see how this is a problem across the borough when you are going to an online system (which I agree with) which will prevent people selling visitor permit. The council enforcing how many people I can see based on the parking permits is very draconian and an not something a free society should be doing.
WG Inner	Yes	Need more free parking permits for businesses - for our staff and when we have contractors and services calling
WG Inner	No	No matter what any residents say, you'll make these draconian changes to make more money - regardless of vulnerability in residents. Family, friends and carers would be struggling. Please leave it as it is and stop trying to use us for financial gain
WG Inner	Yes	Obstructive parkign by my space makes it difficult for me to get out
WG Inner	No	Obviously commuters wil park near stations. Nowadays, however, many people ar working form home and many parking pressures are reduced as a result. More zones just adds confusion and frustration and is of no help. The fact that there is no road maintenance and ther eis litter everywhere does not help. You should also require new housing developers to provide parking to accommodate the incoming residents. Currently you allow developers to effectively print money by avoiding parking provision. On partial solution would be to allocate space in both private and council car parks for residents in these 'car free' developments.
WG Inner	Yes	On the map it's not clear if Leverton Close is in WG Central or Bounds Green S. We need to remain in the same zone as Watsons and Ringslade

		One house has 3 cars with permits, 3 vans with no permits and several other cars without permits.
WG Inner	Yes	They use various devices to obscure number plates - including bins and traffic cones. They seem to do this with impunity - -which obviously annoys the neighbours. They also operate a car wash and valet service from their front garden
WG Inner	Yes	One side of Burghley Rd has no houses, so it would be an ideal area for EVCPs. Put in 5 without bothering anyone
WG Inner	No	Parking should be free - especially for those with mobility issues
WG Inner	No	Parking until 10pm unnecessary if you can deter commuters and long stay by having more resident bays
WG Inner	Yes	People park anywhere on Brampton Park Rd regardless of permits and disabled bays. Fruit and veg stalls take up half the road. Also, 'boy racers' frequently use Wood Green High Road to drive at high speed (60mph+) most evenings
WG Inner	No	Please do not do this. I'm currently purchasing a permit for our new car
WG Inner	No	Please do not enlarge the central zone.
WG Inner	No	Please don't change the system. It works really well now and justifies the price of the annual residents permit parking. Changes would create confusion and make it harder to continue to help neighbours around our local community as we would no longer be the the same CPZ as the majority of Noel Park. Please can we also have more bike sheds.
WG Inner	Yes	Please increase no of business bays as there are only 4 and many working vans block them. Alternatively, allow BP holders to use all bays/ or have some combined residents / business bays. Thank you
WG Inner	No	Please just ensure that we can park on our street or nearby.
WG Inner	No	Please leave the zones as they are. I am apposed to your proposal
WG Inner	Yes	Please make an effort to employ staff to check blue badge abuse in the area. It is rampant. They should check the name with the vehicle log book. I predict that over 60% of blue badges in the area are being used illegally
WG Inner	No	Please make it easier for small businesses ! We need your support! To help us survive and grow! Increasing the parking restrictions at this time is going to have a negative impact on small businesses! Many of us are finding it hard to survive as it is and this could be the final nail in the coffin! If it is too difficult to park, we may just all work from home !
WG Inner	No	Please note I am now too old to get a bicycle
WG Inner	No	Please please don't waste your time & resources on a pointless consultation - use your resources on stopping crime, antisocial behaviour, drug dealing, pickpocketing, knife crime, gun crime, youth crime - these are far more pressing issues & need urgent action. The High Street has been decimated by the virus & these sorts of schemes will do nothing to help it Haringey has proven that they struggle with wholesale changes - see the complaints the new online parking system has caused. I can't see the council implementing a change in boundaries without it becoming a mess for local residents. Finally, and again, don't go ahead with this proposed scheme, it will benefit no one at all Thank you
WG Inner	No	Please see my comments about more efforts to crack down on traffic violations at the taxi rank by Graham Road and deal with the drug dealing outside of the tube.
WG Inner	No	Proposal mean we would not any longer be able to park on Wolsely road - although we were promised previously this would never happen. So where would we park. I support the boundary changes if it stopped people parking in Warberry for shopping / commuting. Warberry residents mostly have 2+ cars per household so parkign is very difficult. There should be a limit of 1, as this is London and extra cars are not needed
WG Inner	Yes	Restrictions need to be enforced also teh traffic flow needs to be properly assessed

WG Inner	Yes	RingGo app does not have accurate restrictions shown by location code. Visitors have received PCNs despite app confirming that parkign was paid for. " hours max stay in some areas makes life very difficult at times
WG Inner	No	SEE LIST OF SUPPOSEDLY CAR FREE PERMITS ISSUED
WG Inner	Yes	Some of these questions don't have a ready answer that fits the situation.
WG Inner	No	Sundays are important for church visitors. Proposals would not benefit anyone apart form a very few residents. This area was in the Inner Zone some years ago.
WG Inner	Yes	Support changes as long as the permit is affordable. Your plans look OK but should be discussed in more detail with residents. There could be questions arising which need further explanation
WG Inner	No	The inner zone would be increased in this crap proposal.
WG Inner	Yes	The new layout of the Wood Green CPZ does include the new Clarendon Development, formerly known as Heartland National Grid Site. It was promised to residents during the planning phase that this will not be the case. As it is planned to be a car free neighborhood with very little designated parking space, as a resident in Hornsey Park Road I am afraid that the new residents of the development can then apply for a parking permission in our roads. As HPR and surrounding roads are very overcrowded already and under a lot of parking pressure this will make the situation for current residents a lot worse. The promises made to the residents of Hornsey Park during planning application should be upheld.
WG Inner	Yes	The new proposed Wood Green zone is still too large. Stretching from Turnpike Lane to Wood Green. There is a strong argument for much smaller zones. EG the quadrangle Park Avenue, Station Road, and left hand side of High Rd by council offices could be one zone the proposed zones do not reflect communities as the council claims. Very crude adjustment proposed.
WG Inner	No	The PMRA objects to the inclusion of the Heartlands Development in the new Wood Green Central CPZ. The consultation says the proposals are aimed at ‘creating smaller, tailored parking zones’. The Heartlands development zone and area of intensification which includes Clarendon Road N8, Clarendon Road N22, Mary Neuner Road, Western Road, Brook Road and Coburg Road must be one such zone – a sixth zone. Haringey Council has either granted planning permission or is in pre-application negotiations for more than 2400 new dwellings in this single car-free zone and has committed to create the legal agreements to ensure this is achieved. This area must be a ‘tailored parking zone’ as park to this where parking controls are fitted to and managed under the relevant ‘car free’ planning permissions. We have sought confirmation through two FOI requests that Haringey has ins
WG Inner	Yes	The proposals aim to reduce the short trips within the current two zones and to deal with antisocial social behaviour as indicated as Wood Green and Turnpike Lane stations. Alexandra Road being central to the Wood Green shopping area suffers from such parking demands associated with use of the various outlets in the Town Centre. There should be more encouragement or direction for such users who wish to park to use the off-street parking facilities such as the shopping city car park, that exist without compromising parking opportunities for residents in Alexandra Road. As such there should be no such provision for visitor parking in Alexandra Road in my view. Also you have missed a major opportunity to give the Heartlands new build estate and surrounding areas off the Clarendon road it's own CPZ. If the aim is to reduce short trips I imagine this development with all it's pr
WG Inner	No	The proposed changes are not viable and should not be implemented.

WG Inner	No	The proposed changes will only increase the pressure to find available parking spaces on mine and connecting roads. Recent changes by Haringey have already made it ridiculously difficult to park on my road for all residents. There has been the introduction of 2 disabled parking only bays which are not used by residents, only visitors. The residents with a blue badge park in normal resident parking bays outside their house, thus negating the need for designated disabled parking bays. There are old driveways which have been bricked over and no longer in use, yet there is yellow lines in the road leaving a 6ft space which would be better served for all residents being joined into the adjacent resident parking bay as currently it is literally a redundant 6ft space on our road. The past year has also seen the entirety of one side of Lyttleton Road having resident parking r
WG Inner	No	The Sandlings is a Private Parking estate
WG Inner	No	The Wood Green Parking Zone review must take on-board the needs of all the small businesses and organisations - creative, hospitality and others - that are located on Coburg Road. An increase in the Outer Parking zone to 7 days and until 10pm at night will mean that the businesses will not be able to trade as effectively. Because of the nature of their work, many of them operate their businesses during the evenings and on Sundays, their visitors, clients and customers come in during these times particularly so that they can park safely on the street close to the buildings. The creative sector has been one that has been adversely affected by Covid. The parking changes would put additional pressure on these businesses when they have been struggling to survive for the last 18 months due to the pandemic.
WG Inner	No	There are 1700 new homes in the new Haringey Heartlands devt which has minimum parkign space, so it's obvious they will all park in Wood Green Inner zone. Madness!
WG Inner	Yes	There's nowhere for friends and family to park if needed
WG Inner	No	These proposals would have a big impact on our congregation - especially older members of the community. A reduction in numbers attending would also have an impact on the community projects that we run
WG Inner	No	This feels like a smoke screen to raise money for the council
WG Inner	No	This is a money making exercise under the guise of environmentalism
WG Inner	No	This is an academic and unnecessary exercise. Seems you are trying to invent a problem which you will then solve in order to meet your targets. We have no easy way to get a permit as we don't own a car but need to hire cars from time to time This means we get constant fines because you can't organise permits for hire cars. Please seriously consider spending the money on improving your services to residents
WG Inner	No	Very concerned about the Mall car parks where there is regular theft e.g. of catalytic converters. Burglars drive in with false number plates.. The Police are not interested
WG Inner	Yes	We get a lot of scratch card users paring here who work either at the bus garage or for the council. A lot of WG Outer zone permits are used on our road - again by council workers. Changing the zones will stop this as well as stopping a lot of short journeys. Some households have upto 3 cars, so extra cars shoudl be charged even more
WG Inner	No	We have an entrance off Coburg Rd into the Chocolate Factory compound where the parking is extremely limited.
WG Inner	No	We said previously we preferred 8am to 6.30pm. Suggest that CEOs help deal with enforcement of littering and fly tipping. This would be a better use of resources
WG Inner	No	We suggest following are considered: - more pay and display bays available for longer hours on Coburg Road and Silsoe Road (and other roads in the Outer zone close by to us). - convert the business bays (which are frequently empty) to visitor parking bays so that anyone can use them to pay for parking during the Outer zone hours. - more disabled bays for blue badge holders. - a loading bay for Karamel restaurant and venue.

WG Inner	No	What surprises me the most is that the old inner area will be wider with the proposed division, so it would be impossible to park due to the increased number of people that will live in the area due to the new developments by the national rail tracks. In addition, where are the improvements to make the area more pedestrian and bicycle friendly in your plan? Please, do your work properly.
WG Inner	No	When the CPZ was first introduced (with Inner and Outer zones) residents were promised by councillors that Inner permits would always be valid in Outer zones and vice versa. This reassured those near boundaries that they would still be able to park nearby. The current proposals demonstrate that promises from politicians are worthless, which has always been the way of the world, I suppose.
WG Inner	No	When will the council enforce the rule that council employees MUST NOT park in the local roads near the council offices on and near Station Road. This is consistently ignored and consistently not enforced by CEOs. The council has thus far largely ignored any correspondence about this. It's almost like the council don't care about their tax-paying residents' opinion... What will it take for the council to act on this? This has been the rule for at least a decade. How and why do staff get away with behaving so badly?
WG Inner	No	Why are parkign restrictions so long? They don't reflect business hours. IIt discriminates against residents and their visitors as well as discouraging people from visiting the shops and services (and spending their money here)
WG Inner	No	Why no option for reduced hours? Current restrictions are far too harsh and restrictive for residents as well as businesses. Multiple new zones wil isolate the elderly and otehr groups even more. Longer times will add to the problem. Nobody can tell me why the restrictions are so harsh. The council should eb ashamed of trying to force this through and not offer other options.
WG Inner	No	Would support if it was not just a scheme to raise revenue. You will disproportionately affect the most vulnerable, and local businesses. Suggest working to: limit cut throughs; have safe and secure cycle facilities; Make it much easier and affordable to buy VP for family, friends, and traders. Don’t just install 5 zones to stop people parking around their own neighbourhoods.
WG Inner	No	Would welcome discussions - with businesses in Clarendon Road industrial estate.
WG Inner	No	You'll just do this because it's a nice little earner. About time we had a council which served its communities.
WG Inner	No	Your parkign changes on Wightman Road have displaced issues to other roads. Your current proposals will cause more issues and extra costs. I'm sure there are better things for you to focus on. You proposal seem poorly thought-out and more of a knee jerk action
WG Inner	No	Your proposal ignores the need for easy access to services - like GPs - and divides up Wood Green for the purpose of increasing council revenue. No point in having all these every small zones apart from creating the opportunity to charge residents more.
WG Outer	No	
WG Outer	No	
WG Outer	No	
WG Outer	No	Aggressive drivers park partly on the pavement outside shops form 601-613 . These bad tempered drivers obstruct pavement users and the problem should eb dealt with by CEOs as a matter of urgency.
WG Outer	No	If 5 zones created it would cause problems taking my immobile partner to the shops and services. and for a break from being in the house. Friends will have difficulty visiting. Relatives will all be in the separate parking zones. Collecting post form Wood Green sorting office will be a problem. At my age I can't do my weekly shopping on foot or by bycycle. Oldies do NOT all have smart phones and mobile tech to use apps etc. Our lives will just be made more difficult. One day you may become old, frail and partially sighted.

WG Outer	No	Speeding is the dangerous issue -especially as we have 3 schools nearby: The Grove, Belmont Infants, and Belmont Junior
WG Outer	Yes	- Wightman road is too narrow for it's existing speed limit and is dangerous for cyclists - Suggest to reduce speed limit on Wightman road - Suggest to make Wightman road one way street.
WG Outer	Yes	#206 has a DB outside which is only used by relatives visiting and using a blue badge. I'd support this being returned to general use now that there are no drivers in the household.
WG Outer	Yes	8am to 10pm Monday - Sunday is good for us even though there is a lot of double parking on Sunday which is bad if you are trying to drive through. Suggest having parkign on one side only on the main road.
WG Outer	No	A business owner in West Green Road has managed to obtain 8 - 12 residential parking permits which are displayed in his vans which are parked in my road and in nearby roads. How has this been allowed? I want a proper response from Parking, or from my ward councillor. Th e council must investigate how a business owner has been allowed to buy multiple residents parking permits when her / she does not live there. SEE FORM
WG Outer	No	A ground anchor for motorbikes at Gladstone Ave would be nice. Is there an application form for this?
WG Outer	Yes	About time - this was initially suggested about 10 years ago and I think its a good idea
WG Outer	No	According to the proposed changes my house will fall on the border between two parking zones considerably limiting my parking options. I am not supporting the proposal. If it goes ahead I would suggest that people like me whose house fall on a border between two parking zones will be allowed to park on either of the two zones.
WG Outer	Yes	Active travel must be the priority for al who are physically able. Reduced motor traffic makes for safer cycling and I am a keen cyclist. I hope proper segregated cycle lanes will be installed in Wood Green instead of some painted lines
WG Outer	No	After all the issues of Covid 19 Pandemic which affected a lot of people's finances, I think it is unfair to be proposing a plan that will further have an impact on the finances of residents. In some councils, resident are given free parking permits and are expected to buy visitors permits, this is a fair plan. However, in Haringey, residents pay for both theirs and their visitors parking permits. Please can the council just be considerate when making changes that affect their residents.
WG Outer	Yes	Agree in general but we do need to be mindful of the needs of those who cannot walk or cycle. Please target engine idling - especially the ice cream van at Ducketts Common.
WG Outer	No	ALL COMMENTS ARE IN ANSWER TO Q6
WG Outer	No	All-day visitor parking permits should be made more affordable
WG Outer	No	Any change will not reduce congestion. Also, the council already intends to charge more for residential parking, with less free parking. Not fair really.
WG Outer	Yes	Anything to make cycling and walking better is welcome - and too many people still drive for short journeys
WG Outer	Yes	Apart form non-locals sitting in cars playing loud music, the real problem is speeding, reckless overtaking, and alack of concern for cyclists. Poorly maintained roads with bad pot holes are also of some concern

WG Outer	No	As a council Haringey say they are trying to promote the use of electric vehicles. I was recently looking into changing my vehicle to an electric model but the current infrastructure means that this is not currently a viable option. Currently electric vehicles are significantly more expensive than their petrol equivalents. This should be offset by the running costs, however currently the only option if you do not have off street parking is to use one of the few electric charging points. These points are monopolised by a single supplier and the rates are way in excess of domestic suppliers. I'm not sure whether this is solely controlled by the local council or is a London wide policy. If there was a serious commitment to increasing electric vehicle use then the should be investment to provide residents with dedicated parking bays for their properties with connections to the
WG Outer	No	As a long term resident family we are aware this change has been proposed at least twice before but come to nothing? What is different this time? What were the objections previously? Why did it not progress then and is that outcome likely to be different this time? Have changes to the Blue Badge/Companion Badge scheme been taken into account? With the now confirmed changes due in August to the Companion Badge scheme my elderly father's doctor, chemist and dentist fall outside of our current CPZ. Therefore the new free resident's permit will be useless at these regular appointments and leave him increasingly vulnerable to criminality via theft of his Blue Badge when now forced to display it more often for longer periods at various locations.
WG Outer	No	As a resident of Wood Green area I believed I should be able to Park either Inner or Outer CPZ as we pay our council tax as well we have the rights to park on our own borough
WG Outer	No	As a resident permit holder of the Wood Green Outer CPZ, it can be difficult to park in the Inner CPZ for a short period of time. Please consider putting a time limit on how long the Outer CPZ holders can parkin the Inner CPZ. This will help stop the commuter parking. It is unfair to residents in the Inner Zone and for those with Outer CPZ permits who cannot park either. I'm sure introducing all the new zones will be at a significant cost. The above may help the problem without such a significant cost. Thank you
WG Outer	No	As i mention I only found out yesterday, which was the 06/08/2021 that i am not able to order paper based visitor tickets anymore, w/hen I tried to order visitor tickets, but I have to order virtual visitor tickets now, I think this is very unfair as i sometimes do not have access to a computer and my mobile phone does not internet access. And i am worried for my parent as they do have a computer or mobiles so would be able to access the virtual visitor tickets when they needed them. regards
WG Outer	No	As usual when Haringey consults, it is a forgone conclusion to make life as difficult as possible. Currently the positive thing is that my permit allows us to go out without worrying about paring and the hassle of scratch cards or pay-by-phone. Your proposals are solely for the benefit of the council. Your services are terrible: dirty streets, impossible to speak to anyone on the phone.
WG Outer	No	Aside from my previous comments regarding the additional costs to residents, there's nothing mentioned with regards to people who drive to places of worship and therefore require parking. For example, there's St Paul's Church on Station Road. The new proposed Wood Green Central Zone would mean that people will require visitor permits if they wish to drive to Church on a Sunday. The proposals will impact all of the community who attend different places of worship across the borough. For Q4, I answered it's Sometimes difficult to find a parking place. With the council recent approval of 6 additional homes to be built behind the land between Station Road and Barratt Avenue, this will only become more difficult to find a parking space in the future. Extending the hours of the CPZ won't resolve this if there's no plans to create more parking spaces/limit the number of resident
WG Outer	No	Be fair to residents and stop taking money from us
WG Outer	Yes	Boats and trailers from a property in Morley Ave are left on the road or attached to council signs. These take up too much space particularly when w e already have shoppers and people going into the city in the evenings

WG Outer	Yes	Bringing in traffic arrangements to Barratt Ave has moved congestion into Station Rd. You may need to consider putting in DYL. Parkign is manageable but if everyone goes back to work, then parkign will become very difficult
WG Outer	No	Can my son who lives with me and owns a car, have companion badge? Thank you for your consideration
WG Outer	No	Can't stress enough how unnecessary your proposals are... regarding trying to change times ... there is nothing wrong with the times Mon to Fri 8am - 6pm ... Saturday and Sunday especially Sunday should be a free day for family and friends visiting. We have lost so much viable business in Wood Green its not what it use to be ... all we have now is cheap tacky shops and loads of cafes/Turkish restaurants ...
WG Outer	No	Caversham Rd does not need more Pay-to-park but DOES need 2-hour no return parking bays which are free to park in. You used to provide these and they are sorely missed
WG Outer	Yes	CCTV across roads would help with public order and keep both people and cars safer. I've seen some people using private cameras to monitor their own vehicle; so a sa public service, this would be appreciated
WG Outer	No	Change parking will not reduce crime and help walking and cycling. Please put police on street and fix and clean footway.
WG Outer	No	Changing the parking zones for residents is not going to address the issues set out under 'Why we are proposing the changes'. These changes are not going to spark residents into walking to the shops or cycling - if you want to encourage those types of behaviour changes then you should be addressing quality of footpaths, street lighting, safe streets, improving cycling paths and traffic loads on roads, alongside sport and physical activity initiatives. This proposal will only result in more revenue generated by the already overzealous parking inspectors who are all too ready to issue fines (even when you have a parking permit). This proposal does not go anywhere near describing what the benefits are for me/my local community by making these changes.
WG Outer	No	Charging points will reduce parking space for both the charged vehicle as well as others. Visiting trade vehicles should be exempt. Details of temporary restrictions/suspensions should be notified by email to permit holders in the relevant area. Prices of permits should be reduced if the five zones go ahead because the privileges of a permit will be reduced. Re an earlier question, when I have problems finding a space I don't know what factors are responsible: and I'm nowhere near a football ground so my answer for that question was a guess - that there are problems on match days.
WG Outer	No	Check if the DB here is still required
WG Outer	Yes	Clear signage needed
WG Outer	No	Commuters no longer park here (since CPZ came in) and most people who park here to use the trains or or for socialising, or who cause ASB don't live here. Most of my cycling colleagues have no faith in cycle lanes which are often on roads which are too narrow for all this demarcation. Given that so many people will continue to work form home and commuting will be much less; there is no need for change now. Thank you for asking for our views.
WG Outer	No	Completely ridiculous. You've increased permit charges and made it harder for visitors and family. You are bleeding us dry financially with constant increases in charges for permits and council tax. Please rethink this ASAP
WG Outer	No	Concerned at the very poor cycle infrastructure here. Why no 'Boris Bikes' in Haringey?
WG Outer	No	Controlled parking can be useful but it can also stifle small businesses. Can you explain why we need to extend the Cpz for Coburg road to be effective on Sundays ?
WG Outer	No	Controls not needed at all at my end of Sirdar Rd. Ideally there should be a maximum 2 hours parkign time for non-residents. I have carers visiting twice a day - as well as family / friends and the current restrictions make this very awkward

WG Outer	No	CPZ are always been tougher in working class community area why?? Why no strict time bend around Muswell Hill or other areas of Borough?? This is insane !!
WG Outer	No	CPZ works fine as it is. However I know that nothing I say will make any difference to you
WG Outer	No	CPZs do help residents but once they are in place you abuse it by introducing a barrage of extra taxes like the diesel surcharge. An electric van capable of carrying 1 tonne doesn't exist nor can you buy a petrol one so will always have to be diesel. Engine size and CO2 are irrelevant as pollution is much more related to vehicle usage. Being parked outside my house does not cause pollution. When I move I will get a house with a driveway in order to remove your control over my life.
WG Outer	No	Current arrangement are fine and should not be increased
WG Outer	No	Current is fine. We don't need any new changes
WG Outer	No	Current parking arrangements work efficiently. Restrictions will inhibit local elderly residents from freely visiting local shops, places of worship family and friends within the Wood Green area. Promoting isolation and impacting on their mental and physical well-being.
WG Outer	No	Current scheme also helps the local economy
WG Outer	No	Current scheme is working very well
WG Outer	No	Current system works and doesn't need changing
WG Outer	No	Current Woodside West times should remain as they are. This facilitates school drop-off and pick up. Families need to be able to meetup without always needing to pay for parking. Covid has brought a lot of constraints on family income. we don't want more restrictions now when times are hard
WG Outer	No	Current Zoning has worked well for many years. There is no benefit to residents from your proposal, rather it would limit our freedom of movement and make it difficult to readily access medical and family support without a lot of disruption. We are totally opposed to this.
WG Outer	No	Currently we can access GP surgery, shops and dentist with our permit. We would not be able to park near any of these facilities under your proposed re-zoning. I have severe mobility restrictions. Please Please, leave things alone.
WG Outer	Yes	Customers of cafes and restaurants parkign at the Green Lanes end of Falkland Rd. Multicar households are largely those houses which have been converted into flats, There is no obvious solution to this. Trade and internet delivery vans have increased durign the pandemic. You do need to take action on teh blue badge abuse.
WG Outer	No	Deal with the parking on both sides of the road at the sports centre on White Hart Lane by Woodside High School. This causes congestion and shoudl be stopped.
WG Outer	Yes	Despite my mother receiving a PCN recently, I notice that there are a lot of cars parked regularly at the Green Lanes end of the road by people using bars and restaurants and it looks like CEOs are ignoring this. Other residents have raised the same concerns.
WG Outer	Yes	Disabled Parking Bay outside 37 Lausanne Road is no longer used (disabled resident moved out at least 2 years ago), so can be removed. This would be a good location for installing a BikeHangar cycle parking facility. Parking restrictions on Hampden Road (the section between Wightman Road and Hornsey station) need to be enforced: they are currently not enforced. So this street is now heavily used for commuter parking, and motor vehicles accessing this street are a significant source of traffic on surrounding streets. Allowing unregulated parking on Hampden Road does not align to Haringey's Transport Strategy.
WG Outer	Yes	Don;t agreee with the split across the ladder. We also thing Wood Green Central is too large - it is even larger than the current WG Inner. There should be higher charges for SUVs and other oversized vehicles. Also it;s time to change the VP for a modern electronic one or at elast to reduce the time between application and delivery to a more sensible time gap instead of the current 10 days

WG Outer	No	Don't change the CPZ please. I do not understand how these changes will improve our local community. On the other hand it will prevent any local travel and support to local shops.
WG Outer	Yes	Don't mind the zone change but do NOT support any extension of CPZ hours, which are already disproportionately long
WG Outer	No	Don't think we need more Visitor parkign weekdays - maybe Saturday /Sundays only
WG Outer	Yes	Electric vehicles (EVs) are currently the preserve of the wealthy. They are likely to command a premium over internal combustion-powered vehicles for the next 5 years, at least. Providing EV charging points on busy highstreets and shopping centres (eg Wood Green High Road) merely encourages wealthy people to drive to the shops: they can park for free, in a prime spot, AND get free electricity. You need to rethink this policy: it creates what behavioural scientists call a perverse incentive. Perhaps: (1) attach a fee to the on-street parking bay for EVs (2) provide EV charging in the (paid-for) multistorey carpark (3) replace EV charging points with charging stations for e-bikes and e-scooters. Increase the number of safe places for people to lock up pedal cycles on Wood Green High Road.
WG Outer	No	Electronic parking permits for residents and gusts would be good. Also it would be good if the council removed unused disabled bays outside 216 and 212 and this restricts other residents from parking. On the road. This has been requested multiple times however the resistant of 214 has rejected the requests as it means no one can park either side of his dedicated parking bay. Which is not right or fair for other residents of the street.
WG Outer	Yes	Electronic visitor parkign by app would be great as the VP currently take a long time to arrive. This means I need to buy in bulk which then risks them expiring. Encouraging more car club parkign would help, as many vehicles could eb shared rather than 1 car per house
WG Outer	No	Extremely unhappy about proposal for even more restrictions. This is outrageous for the community and feels like we are being segregated and controlled. I do hope that Haringey council is not using this to make money by penalising residents and struggling businesses. Permit prices have rocketed sky high over the years.
WG Outer	No	Fairfax road is easy to park on and we do not need further restrictions. It's already expensive to park and the council has never once correctly processed my permits. Your schme woudl stop me using the local area at a time when we are being asked not to overuse public transport, and to stay away from others
WG Outer	Yes	Finsbury House needs more parking space as well as access to on-street parkign
WG Outer	No	Focus on getting the current zoning to work instead of introducing yet more changes. I am more concerned about congestion on Wood Green High Road. restricting parking on residential side roads wil not help ease this.
WG Outer	Yes	For visitor parking, it would be helpful to have pay-by=phone in any area within the zone; not just in dedicated bays
WG Outer	Yes	Free parkign on Sunday for anyone makes it very difficult for residents. I have elderly parents who I drive to appointments and often cannot park when we return which means they have to walk often quite a distance. Have controls on Sunday as there are car parks available for shoppers etc to use.
WG Outer	No	Free parking at weekends + free VP
WG Outer	No	Great that the council are undertaking this consultation. I would fully support plans to decrease the level of traffic and need for car use. We need to install Electric charging, more bike sheds. We also need to improve the bridge crossing on Hampden road into Crouch End to accommodate Parents with buggies and prams as well as encouraging more parents and children to walk to school. My children and I spent a week walking to school (as part of the walk to school programme) we enjoyed it immensely but the only drawback was the bridge crossing.

		Happy with current settings and I'm strongly against the proposed new zones and operating days/times.
WG Outer	No	It would restrict people and would devastate Wood Green town centre shops and businesses by discouraging people form visiting. I urge you to abandon this scheme
WG Outer	No	Hard to park since the flats across the road were built. The flats hold a lot more people than there are parking spaces
WG Outer	No	Haringey just wants to make money because of their budget shortfall, so they target the car owners.
WG Outer	Yes	Have less cars on the street - it will be great.
WG Outer	No	Having a set number of free VP would be really helpful to a) reduce household costs, and b) ensure that trade and other services can attend more easily at the property. It would be useful to have a few more shared use parking bays when trade and service calls are made at busy times of the day
WG Outer	No	Having recently re-applied for my parking permit, I noticed that Haringey council opts to price parking permits on the basis of emission produced by a vehicle. I assume that these emissions are based on figures provided by the manufacturers of the cars rather that tested by Haringey council. As such I believe that the way the Council opts to creating its pricing plan for residents is fundamentally flawed on 3 reasons: 1) The permits are for parking of the cars- not for their movement on the roads. As such all cars, when parked and turned off do not produce any emissions. Road Tax and ULEZ are taxes put in place by the government to reduce emissions. Therefore, by charging for cars based on emissions the council is crossing purposes of what resident permits are for- which is for people to be able to park outside their homes and deterring people from using up parking spaces
WG Outer	No	How much is it going to cost to change all the signs is this goes ahead? My CPZ would be one of the smallest of the five, ridiculous! In my opinion, with what you are currently and future charging, a resident should be able to park in any residential bay, in the whole of the borough. This about revenue generation, not pollution, commuter parking, traffic management or any other issue that is currently in vogue.
WG Outer	No	How much money is being wasted on these changes at a time they are not needed?
WG Outer	No	I agree that parking controls are required given the location near to the Underground station at Turnpike Lane for commuters.
WG Outer	No	I agree with the aim of making the borough less polluted with cars but this should be done by making it easier and safer for residents to use alternatives to the car, such as better cycle paths/routes, not the piecemeal arrangement we have at the moment rather than just charging people more to park . As well as disadvantaging older and disabled people it will also be much more of a disadvantage to less well off people. There should also be a scrappage scheme for people to replace their old diesel and possibly petrol cars with electric cars both nationally and within Haringey and parking incentives for electric vehicles.
WG Outer	No	I am able to do the school run, and take my children fo routings. I don't understand why you would put a boundary in the middle of the road. We should not have to pay extra for using local facilities (shops restaurants, cinema). This is just a scheme for the council to make money form charges and handing out PCNs to unwitting residents
WG Outer	No	I am broadly in favour of parking restrictions that help reduce the number of vehicles on London's roads and encourage greener forms of transport. Please look again at the proposed boundaries of the new zones in Wood Green so they remain fair for current residents and do not extend the size of the central area to enable short-hop car journeys within that zone.
WG Outer	No	I am happy with the parking restrictions as is. The proposed changes will cause major disruptions. It restricts movement throughout the borough for Haringey residents.

WG Outer	No	I am hoping that this is a true consultation exercise and not a tick box exercise with the proposals already decided upon. As such, please humanely consider the financial impact introducing additional controls will have. Humanely consider the fact that people do not typically drive frivolously and that if there is indeed an impact that this is most likely to to the inner zone only and as such sensible and intelligent change should be made there. I understand that there is the belief this will help save the environment but given the fact that many industries impact the environment with nothing being done at a governmental level, I question the sincerity of this being a reason for this change. Instead there should be an educational programme coupled with bona fide studies and data that illustrate the impact of driving, the impact on human life and what behaviours need to
WG Outer	No	I am in complete disagreement of the proposed changes to parking, I think it's a waste of money and time, whilst putting additional cost to residents already paying expensive permit fees, to be now told they can't park in the same areas. Having lived in this area for a long time having a parking permit to go to the shops or the post office is something vital for me and my parents who are older, without this We wouldn't bother to shop in wood green and would go out further to Westfield Stratford.
WG Outer	No	I am in the ladder and would need to go to the central area to provide daily care to my relative. I am also a pensioner and can sometimes walk there but not in bad weather or evenings. Commuters who currently use Turnpike Lane would in future park in border roads like mine and create parkign chaos. These proposed zones are far too small except for the expanded inner zone. I attend the Greek Orthodox church in Wood Green and currently park easily near the church. This would come to an unacceptable halt. You wil be restricting my freedom to live my life in a useful way. My whole life would have to change for the worse Your claim that teh new zones will keep existing operating days and times is not true. Those who live near Turnpike Lane will have times increased to 10pm and days will increase to include Sundays. You need to rethink this and consider your residents
WG Outer	No	I am not against boundary changes and support fewer car journeys however I have an allotment and would be unable to drive to it with these boundary changes. Could some provision be made for allotment holders?
WG Outer	No	I am not opposed to the boundary changes per se, but am appalled by the associated operational time changes
WG Outer	No	I am opposed to these changes. I've lived here for more than 40 years and I'm tired of hearing about Haringey council plans, that you claim are about making residents' lives better when they actually make our lives worse. This plan is just going to make me more isolated and less likely to visit my local high street. And please do not extend the hours of operation as then I'm going to have even fewer visits from friends and family in the evenings because of the cost of buying the required visitor permits. We've been isolated enough during Covid, we don't need anything else that'll make it more difficult for our loved ones to visit. All the best, the residents of 5 Lausanne Road
WG Outer	No	I am really unhappy with how some local changes have been put in place over the many years I have lived here. The way that Wightman road has been developed causes so much risk to every user, it is terrible. The need to keep on squeezing cars and other vehicles against the jutting out paving has caused damage to tires (including mine), local garages have benefitted but not residents. I see so many near accidents for cyclists and other drivers and the road is now avoided by several people I know who are worried about negotiating the bends and narrow passing places. These proposed Zone changes will simply create more confusion as you try to drive around in your local area, we all have to spend additional money on visitors permits just to park for a short time to visit / help friends who live relatively nearby (I note that this year there are no 2 hour permits provided -

WG Outer	No	I am wary of these consultations as it's always about money and they are pushed through regardless. These surveys are just going through the motions. I was wondering a couple of years ago what you'd come up with to extort more money from us and I actually thought you would do exactly this…and here we are! All this CPZ means for me is that I can't easily or quickly visit friends anymore without paying and it will cost me more to go to the shops. So a strong no from me, not that it will make any difference.
WG Outer	No	I appreciate the council needs more money but permits are not cheap. Presumably, if you put in more pay-to-park bays that will reduce reduce resident spaces, so you will get more complaints from hard-pressed residents. Please don't make our lives more difficult.
WG Outer	No	I can currently park in a lot of useful places - supermarket, doctor, and dentist. It is one of the reasons I moved to Wood Green
WG Outer	Yes	I cycle mostly and drive occasionally. We really need segregated cycle lanes to increase cycling. I have been to Copenhagen and Amsterdam where the cycling environment is excellent
WG Outer	No	I do have an invisible disability which is progressive. I would like to organise a space near to where I live as spaces are limited in Progress Way. So many people are selfish when parking and take up two spaces, or don;t park close to the end line of the bays.
WG Outer	No	I do not agree that the proposed changes to the Haringey CPZ will encourage people to walk instead of taking the car. They are unnecessary and will unfairly affect those on low incomes. I strongly disagree with the proposed plan to change the current parking areas and terms.
WG Outer	No	I do not agree with the new proposal. It would appear there is a financial gain for Haringey Council at the residents cost.
WG Outer	No	I do not feel the proposed new CPZ are of benefit. Of course, I speak only for my household, but I have not experienced the problems you mention in your cover letter (difficulty in finding a parking space, anti-social behaviour, unnecessary short car journeys). I suspect, nevertheless, that the proposed re-zoning will go through, even if every single respondent was to oppose it! I light of this, I would like to strongly object to the extension of the CPZ hours in what would be my new CPZ (Wood Green Central) to Mon-Sun 8am - 10pm. This would greatly impact on my households activity. The weekends are when family and friends visit and many of our friends and family live far away such that travel to us by public transport is not a viable proposition. I do not think it is fair that residents in the Wood Green CPZ should have to shoulder a significant financial burden (and
WG Outer	No	I do not agree the changes the council are proposing, and I strongly oppose any changes as outlined in this survey, I am a paying community tax payer to the borough of Haringey and I dont feel I am being treated fairly as a paying resident parking holder
WG Outer	No	I do not support any of the proposed changes
WG Outer	No	I do NOT support this proposed change. It will be divisive and unpopular. This will isolate elderly and less mobile people who uses their cars for short distances because they need to. I rarely have a problem finding a space in either Inner or Outer Wood Green. the current system, whilst not perfect, works quite well. There are so many other problems in this Borough that the council would be better off dealing with.
WG Outer	Yes	I don't drive but do need VP for service calls etc. My view is that parkign (except for disabled) should be phased out as far as possible. Cars ruin the look of the street., are dangerous for cyclists, and reduce visibility when a pedestrian is about to step out. Car owners represent a lazy and entitled life style which is prioritised over others. Constant engine revving, car horns, doors banging, and laser-like headlights - as wlel as careless and aggressive drivers. Your proposals therefore have my support.

WG Outer	No	I don’t want restrictions which would affect friends and family. I'm also concerned at th possible effect on shops, restaurants and services which need customers. Covid has shown the need to have friends and family visits and your proposals for more CPZ boundaries would make it difficult to see people. Disabled people rely on their cars to move around and see friends and family
WG Outer	No	I don't have a car, so rely on family and friends for lift, shopping etc. Your proposals coudl welkl encourage many more people to convert front gardens into parkign areas - thus destroying the environment. I could park 5 cars in my garden but I obviously don't want to because it would destroy a beautiful asset that so many people enjoy
WG Outer	No	I don't know about THFC.
WG Outer	No	I don't see any purpose in the proposed changes
WG Outer	Yes	I don't think the proposed changes will affect us. Those members who live on Wightman Rd and Harringay Ladder will make their own responses. Thank you
WG Outer	No	I don't wish the current CPZ to be changed in any way, it has it problems, but the propose changes will just introduce new ones. I think the wood green inner hours are too long, I do not understand why the chocolate factory area needs parking controls till 10pm in the new system and is to be part of "central" when that whole area was outer before.
WG Outer	No	I don’t see any real value by introducing further Zone for residence other than a money making scheme by the brough. While every year residence permit cost is in the increase, we are now being proposed to split the parking zone. I would like to see a new proposal in residence permit cost, if new zone is to be introduce, then I would like to see at least 60% reduction in residence permit as with new proposal we will be restricted on the area we can park which then needs to reflect on the residence permit cost.
WG Outer	No	I don’t think this proposal is a good idea and I’m strongly against any changes to the current system.
WG Outer	No	I expect these will go ahead irrespective of residents' views. Everyone knows this whole parking issue is for local govt to increase revenue and to help Sadiq Khan's war on drivers
WG Outer	No	I feel there are many more pressing items that require your attention. The fiasco that is Wightman Road's recent alterations should indicate that there is poor understanding of traffic patterns . I am surprised by the small numbers of replies which seem to have been made to the Muswell Hill surveys, it seems most folks don't have much of an opinion about the proposals, although, from experience, parking there is something of an issue. It would be interesting to know the costs of implementing these various proposals, the change to signage alone must be staggering.
WG Outer	No	I find it unacceptable that the cost of Resident and visitors parking permits is increasing. And yet the zones are decreasing. I would like more parity across the Borough. It is unfair that the more affluent areas such as Crouch End and Highgate - where there are just as many cars, do not have such heavy handed restrictions. I am not pro-car - but I am against unfair charges against communities who are already challenged financially. I would like the council to improve walking routes, cycling, green spaces to make the east side of the Borough as attractive as the West. The Council seems to be operating two tiered approach from East to West and it is not acceptable. Car parking is an issue across the Borough so why is it unfairly and unequally managed? The more affluent areas in the west have less restrictions - 2 hour 10-12 or 2-4pm etc, which work well and thereby l
WG Outer	No	i free space needed for emergency services and other visitors incl builders, utilities. EVCP needed at end of the road. Need better Bikehangar or similar secure storage cycle provision.
WG Outer	Yes	I generally support the aim to reduce car usage, please just see my comments about which zone Stanmore Road should be in.
WG Outer	No	I get up ealy at 4am and drive to work as I do not feel safe at that time on the streets. Also my household does main shopping here and not being able to drive to the shops and park will cause problems

WG Outer	No	I have lived on this street for 60 years and whilst the number of cars has increased significantly over the years, parking in Boundary Road and throughout the Wood Green Outer CPZ isn't generally a problem. I am sceptical of your stated aims for this proposal as these are not insurmountable issues and there is a suspicion that the real reason is increased revenue generation. After the challenges created by the COVID pandemic, you should not be attempting to make life more difficult for the residents of the borough who have had to endure more than enough pressures over the past 18 months. As I mentioned previously, I am 89 years old and rely on care from family members. Your proposals would make life more difficult for me as well as my carers and visitors and I strongly object to your proposals. If implemented, your proposals would make me more isolated and I am not alone
WG Outer	No	I have noted that anti social behaviour was referenced as one f the reasons for the proposal for Langham Road to become part of the Wood Green Central zone but drug dealers should be dealt with by the police, who are completely aware of the loiterers around the train station. It has nothing to do with vehicles. Langham road is a residential road and majority of my neighbours find parking right outside their homes. Furthermore it's not Wood Green, it falls within N15 and I don't believe people use the area to park before they go to Wood Green or the high road. It's separate.
WG Outer	No	I have seen this consultation on some lampposts in the area. Haringey have not distributed any letters to any residents as I have asked neighbours. How is this fair?
WG Outer	No	I heard you were capping VP. I don't want this to happen to friends and family who visit from far away
WG Outer	Yes	I hold a carers permit. The permit allows parking on Estate and is used for the expresss purpose of supporting the person being cared for which is required 24hours. There is no benefit to changes to parking zones as I have never required (or permitted) to park in roads in surrounding area, however I have concerns that increasing the time in adjacent zones area and not including Milton Road will have a knock on effect potentially making the situation worse. It is sometimes extremely difficult to park in close proximity to house in order to assist with mobility issues. It is often impossible in the evening and Sunday. The current and proposed times for the Milton Road Estate do not take into account parking from non-residents who come to estate as it is close to Turnpike Lane and for Shopping in Wood Green on Sunday. There is an excessive number of commercial vans on estate
WG Outer	No	I hope that you do not go through with this as the majority of London is extremely difficult to park in. I would like the area in which I live at least to be the most accessible to me and others. I never find difficulty in finding a parking space in various areas across Wood Green so don't see the need for this. Please consider allowing residents flexibility to visit neighbours and run errands without extra costs and inconvenience.
WG Outer	No	I liek being able to go to Wood Green shops (i ma over 70) and it would be good to have short stay parkign there. Multicar households are a parking problem here. I need VP for friends and visits and it would help if builders and other services could obtain permits rather than relying on residents' visitor permits, Would be good to reduce the amount of traffic on ladder roads such as Fairfax.
WG Outer	Yes	I live close to Noel Park primary school and traffic is busy at drop off & pick up times which is hazardous for pupils walking to school. I recommend making this area traffic free at these times and that parents should be encouraged to walk to school wherever possible
WG Outer	No	I need my car for shopping etc having recently injured my leg. I also need to viist my grand children regularly which would be difficult with your proposals. Having visitors and participating in activities would be more difficult. I work in LB Kensington and Chelsea. They just have one CPZ for the whole Borough, so why does Haringey want so many? Your claim that there are problems is not true. I never have difficulty and the system works well. Please listen to your residents and do NOT change the CPZ

WG Outer	No	I object to being included in Wood Green Central zone. Working a 12 hour day and then not being able to come home and park freely does not serve us well and we already spend a fair amount of money on permits to ensure we can have visitors. Your so called more tailored zones seem simply an extension of the area that you can make money from beyond 6.30pm. I live near Turnpike Lane tube and don't see any issues with commuter parking that warrant this change and hope that the proposed change will be reconsidered.
WG Outer	No	I object to the suggested new measures as they are incredibly restrictive. As a resident in Noel Park, the new measures would mean we would only be able to park in Noel Park, and not elsewhere in our locality, which is disgraceful considering there are no shops or restaurants in Noel Park. As residents who pay a good amount of council tax rate, we should be able to enjoy our local community, which means being able to park near shops, eateries, pubs etc. Indeed, the more accessible these places are to us, the more inclined we are to shop / eat locally. If we can't park near thee places, then we will be inclined to drive out of the borough and park elsewhere, thereby spending our money in other areas. We would be much happier spending our money in our borough, which is what we do at the moment. Restricting our parking will mean that we will no longer be able to do our large f
WG Outer	No	I prefer Haringey to allocate attention and budget to further and real improvement in walking and cycling infrastructure at junctions, over tinkering with parking. i.e. cycle lane which joins the two parts of Trinity Road. Proper pedestrian crossing phase of the High Road / Bounds Green Road junction. Cycle lanes and phases in the High Road / Bounds Green Road / White Hart Lane junction. Pandemic is still having a noticeable reduction in traffic in my road, its hard to expect / predict when and whether this will change back.
WG Outer	No	I prefer the current arrangements and coudl not pay to have so many VP taht would be needed. Proposed operating days and times are very long. Please keep things as they are as having fewer visitors will cause more depression. Even Central London does not have longer weekend control zones
WG Outer	No	I really do not see why Noel Park and The Ladder should continue with the current hours of CPZ, and our area - Langham Road, Carlingford road etc- get to be considered to be part of the Wood Green Central. We don't have shopping and parking problems, we are a closely knit community (Langham Road) and I know other residents are upset at the extra expense and impact on our households of having hours extended. Surely, in that case, you should also be considered Turnpike lane as well! I could understand it if we had did have an overspill from shops etc, but it isn't the case for us where we live. I've outlined other concerns and comments earlier in this survey. I understand the climate change and environmental concerns driving the general direction of change, and also I believe that you might ignore anything that points to car use, such as people saying that there are addition
WG Outer	No	I see no issues whatsoever with current operating times in Wood Green CPZ. Just leave it as it is please.
WG Outer	No	I see this as a way to increase revenue - not as a clean air consultation. I now have to rely increasingly on my car because of mobility and I can park close to Lidl at the High Road end of Lymington Ave. Physical impairment means I struggle even with this distance, so please give us your consideration. I feel I must also comment on the increased emissions caused by queues of single file traffic after installations of LTN schemes. If you go ahead with these proposals I wil have to drive to other shopping areas instead of the High Street
WG Outer	Yes	I support changes to discourage short car trips. Current zones encourage it. Please don;t use these changes to increase parkign charges
WG Outer	No	I support the changes but feel that the Ladder roads should all be part of the same CPZ. A boundary at Beresford / Allison makes little sense. Green Lanes and the parks (Finsbury, and Ducketts Common) are natural boundaries.

WG Outer	Yes	I support the proposed changes because I could park in the inner area or the ladder. Parkign here is very complex for visitors because on Turnpike Lane you can get 2 hours but can't park at all for one hour in the morning (8am -9am) and one hour in the evening (6pm - 7pm). You can, however, park for two hours in Vernon, Burghley and Waldegrave roads without these mornign and evening single hour exclusions. This would make eit very difficult for my visitors. I don't understand these complicated restrictions
WG Outer	Yes	I think parking measures are an important part of making this a safe and healthy place to live. We need greeting parking restrictions on Green Lanes to improve bus and cycle lanes. I feel that the council has not prioritised the health, safety and well being of local residents. The roads are heavily congested, it is not safe to cycle, and respiratory conditions such as asthma are made much worse.
WG Outer	No	I think that Haringey should increase the number of cycle sheds in the local area as this will encourage cycling and reduce traffic.
WG Outer	No	I think that the parking zones do not need changing, they work perfectly fine the way they are, I think this is just another excuse to rake in more money from the residents.
WG Outer	No	I think this is just a money-making scheme and it is not appropriate at the present time
WG Outer	No	I understand the change and it may reduce intrazonal traffic. However parking permits are so expensive now this change would reduce value for money as parkign space would be limited. Any chance of cheaper permits?
WG Outer	No	I walk frequently in WG CPZ area and I see that it works well, and there is no valid reason to change it. The point that is made about it 'encouraging' short journeys has not been supported by evidence. Turning WG CPZ into 5 zones will be shrinking our community, which is upsetting. WG CPZ vehicles are allowed to park within the CPZ area, but it is just an option, as many of us choose to walk. Families with children, babies and the elderly may need to use the family vehicle more frequently, but it shouldn't be made more costly for them, or for other residents - Parking permit and visitor permit prices have increased way above inflation. There is also no mention as to whether there have been complaints from residents about WG CPZ as it stands, so we can only assume there haven't been any, or any significant number. And to overhaul the whole of WG CPZ is not the answer to any
WG Outer	No	I wonder whether the Council has thought about fine-tuning the timing of operation of CPZs on a steet by street basis. It seems illogical to create large, undifferentiated CPZs (which admittedly are easy to colour in on a map) when car activity and parking demand on the streets they contain must vary quite considerably. Drivers coming in to the area are expected to check for themselves what the precise regulations are: Technology should enable them to do this on-line on a street by street basis before their journey, and the super-abundance of street signs enable them to do this when they have arrived.
WG Outer	No	I made a point above about friends coming in to the area to visit residents. We are already used to having to pay for visitor permits during the hours of operation of the existing CPZ. I think it would be iniquitous to create a situation where this would become a privilege
WG Outer	No	I would appreciate more free parking for electric cars, plus clear signage that say were EVs can park for free and for how long. Thanks
WG Outer	No	I would like a refund for 16 VP (daily ones) that expired last December and I cannot use. Ialso have unused 2 hour permits.
WG Outer	No	I would be extremely disappointed if this proposal gets through and find your consultation period at the height of the summer break most underhand and unreasonable.
WG Outer	No	I would be grateful if you could this time consider electrical charging point to be installed on our street. Currently we have a 3 electrical vehicles in Falkland Road with no access to charging points and those provided by Source are very expensive. they charge double then normal price.

WG Outer	No	I would like to write about me how CPZ (Car Parking Zones) would affect me, it worries me much. We have had a car but w have it scrapped recently because of ULEZ (it was a diesel Vauxhall it was a 25-year young, not old, car with no problem at all except it had a diesel engine). ULEZ is understandable, acceptable because obviously diesel engines are polluting. We have no car at the moment but we are hoping to get one as my son is handing me down his old car, petrol fuelled 2003 VWGolf. We are not heavy car user, yearly about 600~700 miles. we are retired and most of my days are spent at home. My wife and I have our Freedom Passes supplied by Haringey Council, we value them so much but they cannot be substitute cars. My wife is not in good shape she can only walk for short time she needs car. In case any need arises for long distance travel I use the Freedom Pass. We
WG Outer	No	I would like to see statistical evidence of the need for these proposals e.g th number of complaints raised about intrazonal parking etc. and issues about parkign at Turnpike Lane / Wood Green stations
WG Outer	No	I would not be able to drop my son off at school as his school would be in a different zone. This would affect many (esp single) parents who drop children off before starting work. Please reconsider these proposals
WG Outer	No	I would not support the small size of BG South proposed zone. and do NOT support extension of the times. Also there is nothing in these proposals about increasing the amount of public parking available in the proposed WG Central zone for those who need to use cars to travel to and from the edges of the area. Your proposals would create new problems
WG Outer	Yes	I'd like to see motorcycle dedicated parking with ground chains to prevent theft. Thank you
WG Outer	No	I'm a blue badge holder and family help with shopping. Your proposals would make life more difficult if we couldn't park around Wood Green. I do think that Haringey Council thinks only of pedestrians and cyclists and ignores those with disabilities who rely on their cars, and / or the help of friends / family
WG Outer	Yes	I'm a disabled driver with a space inside my property. It would however be usefulto have a few more disabled bays outside shops etc in Green Lanes and around Turnpike Lane, as well as in the High Road
WG Outer	No	I'm confused with Haringey parking. Dodgy parkign in Green Lanes needs to be sorted and fines issued. Awful how some drive and park around there
WG Outer	No	I'm disabled and have many health issues. Your changes would make basic tasks very difficult - e.g shopping, going to the GP, picking up prescriptions.
WG Outer	No	I'm happy with current parkign arrangements. Looking at your map why are Graham, Langham and Carlingford put into the central zone when roads close to Turnpike Lane tube (on the other side of T L and Green Lanes) are not?
WG Outer	No	I'm happy with the way things are and there's no need to change. I think the council should focus projects on good causes such as youth schemes, recycling, tacking anti-social behaviours.
WG Outer	No	I'm not cvlear why the council is suggesting these changes. I do not support them
WG Outer	No	I'm strongly against the proposals as your map shows that estate parkign will move into the CPZ. I already pay estate service charges and council tax (no value) and I rent a garage, I don't think we should also have to pay for parking permits on our estate
WG Outer	No	I'm stunned you are trying to create 5 different zones to get even more money out of us. It's a disgrace
WG Outer	No	I'm sure the council can think of other ways to waste money from parking. You coudl of course spend it on the roads - now, there's a thought.
WG Outer	No	I've heard rumours about more restrictions on daily passes. Is this true? If so, why?. We need to be able to have trades people and family come in and park easily. How about considering offering spaces in car parks to some of the occupants of flats in car free developments. Everyone knows that these residents often have cars. Seriously, there is a great deal of cynicism of the motives of Haringey Council in putting forward these proposals.
WG Outer	Yes	I'm fed up of people parking to use the tube and. Is it shops. On Sunday it's a nightmare to park here

WG Outer	Yes	If the council want to extract more funds from motorists whilst appearing 'green', I suggest simply ramping up the permit cost for more polluting motors and maybe say if a vehicle is over 4.5 metres, it should require 2 permits as it will require 2 spaces. I heard somewhere that residents can gather and submit evidence of parking contraventions so pcns can be issued remotely. Is this true and if so, how Di I submit please?
WG Outer	No	If the issue is parking around the station then I suggest that the proposed zones are reduced and the restricted zone around Wood Green station should be from Ringslade Road to Watsons to Cranbrook Pk, to St Albans Crescent down to Gladstone, and including Brabant Road. And similarly close roads around Turnpike Lane Station. The solution proposed will actually not remedy the problems identified but simply makes it more administratively burdensome and hostile to live in the area.
WG Outer	No	If the promised regeneration and new train/tube route come in then I could understand the need for zones to be broken down. Also I've not experienced the antisocial behaviour you suggest a result of current parking arrangements. Regeneration and cleaning up Haringey are much more pressing issues to focus on
WG Outer	Yes	If this goes ahead it will need proper enforcement with multiple daily visits from wardens
WG Outer	No	If this goes ahead, our street is right on the edge of an area. I don't want this to go ahead at all, but if do, maybe the streets on the edge of a boundary should be able to get access to park in both areas. Also, since we are know getting less service for our parking. Costs should be reduced. Five areas so reduce it by 5 I would say
WG Outer	No	If you have made this decision, you should be offering free permits; as we would not want to be paying for permits and waiting in the long queues constantly in order to get them. We need a much better service so we can receive visitors as and when they come
WG Outer	No	If you keep increasing these parking restrictions, you will leave me with little choice but to move out of the borough. I have lived here for 55 years.
WG Outer	No	If you want to help parking problems in the borough and discourage the use of cars I think you should suspend parking on through routes on Sundays. Westbury Avenue near the high road is a particular problem with lots of cars parking to get to Sunny Beach restaurant which often impede access for buses and other large vehicles.
WG Outer	No	If you want to make mor money, I suggest having more pay-to-park bays in more streets. There is parkign on both sides of our road and this creates congestion because the road is too narrow for this. PLEASE DON'T have charges on sundays or after 6.30pm
WG Outer	Yes	If you want to reduce short journeys, you need to invest in cycling infrastructure, repair of pot holes and tackle wide scale dangerous driving and speeding. Cycling in Haringey is extremely intimidating esp in Green Lanes and Lordship Lane
WG Outer	Yes	If you are serious, make it harder to park. WG has great public transport and private car use should be regarded as antisocial behaviour. Electric cars will not solve problems of traffic congestion and while EVCPs might be good for house prices, I would prefer to see reduced car use.
WG Outer	No	In relation to Q9/Q10, the only issue from match days, is a combination of the huge congestion and pollution caused by the diesel buses waiting to pick up supporters to/from Alexandra Palace Station. These also park and turn around in the local streets, making parking and access difficult - which hardly seems aligned with your overall aims of improving the environment. The introduction of short term visitor parking would potentially impact the number of spaces in the area for residents, such that it is no longer easy to park; and would negatively impact the questions currently answered.

WG Outer	Yes	In Woodside CPZ there are issues with overspill from Wood Green Outer CPZ on Saturdays as there are no restrictions in Woodside on that day. In particular some van owners living in Wood Green CPZ do not purchase a resident permit as they are away from home during the operational hours Mon-Fri, but are not at work on Saturdays and so park in the Woodside CPZ area. There is also overspill from White Hart Lane CPZ into Woodside CPZ area as the former operates 7 days a week. There doesn't seem to be any rationale for the different operational days away from the central area of Wood Green where the tube station and shops will attract drivers wanting to park.
WG Outer	No	Increase pressure in WG Outer on Sundays. WG Outer should have Sunday controls
WG Outer	No	Instead making the zones more complicated, why don't you just mandate strict controls on the worst-affected inner zone streets like Gladstone Avenue so only Gladstone residents can park there, and keep the inner and outer as it is. Simpler is better! The proposed Bounds Green South zone is dramatically smaller than the other zones. You need to be more realistic. You will not hound or annoy people out of driving when it is essential. What proof do you have that the problem lies in short-distance discretionary journeys? Keep the free parking for outer zones.
WG Outer	No	Instead of changing the parking zone controls the council should invest in reducing car use. Better public transport and put a stop to dangerous driving going on our back streets. Put speed cameras on Perth Road etc and listen to residents who live here.
WG Outer	No	Is any notice taken of consultation responses? Suggest focusing mor eon the violence and gang culture that is evident in deprived areas of Haringey. I nwo rarely use the bus because bicycle lanes have increased bus journey delays. I also wonder why Haringey traffic control vehicles are given resident parking permits.
WG Outer	No	Is the cost of resident permits going to be reduced as a result of less parking space?
WG Outer	No	It is hard for pensioners to pay for visitors' parking - and it is difficult to obtain VP. Also they are expensive. It would make it difficult for my family to visit and difficult for friends. The VP should be cheaper. Do not want controls increased to 6.30pm either
WG Outer	Yes	It is clear that some residents are re-selling permits. The Ladder CPZ should be 8am-10pm Monday to Sunday. More and smaller CPZs needed e.g the ladder could be split into three.
WG Outer	No	It would be better that Crossfield Road and the areas move to Wood Green Central. My preference would be for a little bit more alignment with the new LTN
WG Outer	Yes	It's high time you had a modern delivery system for permits. Currently we have to email the council and wait 10 days for them!!!
WG Outer	No	It's sad when this doesn't really seemed to have been thought through. I'm sure a lot of effort has gone into it, but there seems to some omissions. The road around Ducketts Common should be 8am to 10pm seven days a week because of it's proximity to Turnpike Lane Station and the High Street and the undesirables that sit in the Common. Turnpike Lane between the station and Wightman Road should also have stricter hours because the traffic backs up during busy times. The lower roads on the ladder should be made longer too as because of the people coming from all over London to go to the restaurants on Green Lanes. What about the 1200 parking stalls in The Mall. If you don't want people to park on the street, why can't the parking in the car park be made free at night. I can't believe that is ever full. We should be encouraging people to come to Wood Green and Turnpike
WG Outer	No	It’s awful How you constantly keep putting up Costs and narrowing parking areas and specifically targeting diesel Vehicle that have been brought with low emissions. There is no point in this consultation as you will do it anyway like everything else.
WG Outer	No	Just another attempt to generate revenue and create more financial difficulties for residents. Suggest the council focuses more on ways to help and serve people. Current restrictions are enough and we do NOT want further restrictions and charges imposed.

WG Outer	No	Just another money-making scheme.
WG Outer	No	Just that I understand the need to review parking on a regular basis, but please take into account the economic impact this will have on local businesses. Also, there is no explanation as to why the areas are so disproportionate in size and, at present, no thought of flexibility across the allotted borders.
WG Outer	No	Large groups of loitering men hang out here and outside Rainbow store. They park on DYL but don't get challenged or given tickets. They stay for hours. Your proposals fail to recognise that this area is Green Lanes - where we do our main shopping - not Wood Green.
WG Outer	No	Leave it as it is. Thank you
WG Outer	No	Leave parking restrictions as they currently are. Do not bring ULEZ into Haringey and charge extra for diesel cars or extra for second car households. This is all money-making scheme that will squeeze households further just as they coming out of lockdown restrictions and hospitality sector opening up again. A lot of Haringey residents work in hospitality sector and do not make enough money.
WG Outer	No	Leave the parking as it is.
WG Outer	No	Leave the WG zones as they are. We need the car to pick upp our children form school and community centre especially in the winter months and when it rains
WG Outer	No	Leave things as they are
WG Outer	No	Let the Noel Park school staff park up the road in Bury Road car park so the ycan set an example to children by walking to the school
WG Outer	No	Limit of 2 visitors is incredibly difficult. If you need an electrician and a plumber you can't also have a friend or family member to help at the same time. The way to discourage car use would be to restrict resident permits - not visitor permits and discourage multicar households. Also ensure that resident vehicles are registered and insured in the UK
WG Outer	Yes	Longer hours would cost us so much more in VP permits for evenings and weekends
WG Outer	No	Longer hours would not help families who need childcare and other services e.g carers.. Families would not be able to visit easily. We would need more VPs at much higher cost. Haringey needs to consider its residents rather than just itself.
WG Outer	No	Lot of free space in this road come and look old cars are already going away and free up space. Only police can solve crime in turnpike lane park and road. Change parking will not us here.
WG Outer	No	Lots of cars here have DBs but I never see a disabled person. I appreciate that not all disabilities are visible, but this needs to be investigated properly and as a matter of urgency.
WG Outer	No	Main problem I have is that a neighbour has 4 cars
WG Outer	No	Main problem is getting parking permits, as the council is very poor in this area - disgraceful in fact
WG Outer	No	Many people are without jobs after the lockdown and find it difficult to make ends meet financially. Council is looking to squeeze money even form jobless people. Let Haringey get back on its feet after the pandemic and don't punish people out of sheer greed
WG Outer	Yes	Mon - Sun 8am to 10pm would be perfect as we do struggle to find space after 6.30pm
WG Outer	Yes	More bus routes e.g form Green Lanes to Crouch End would help reduce car joruneys. I do NOT support longer operating hours. I do support rollout of EVCPs - lots of them
WG Outer	No	More concerned with poor traffic management on Wightman and ladder roads. One parkign issue is vans turning out of Raleigh Rd to use the bay on Wightman Rd. There is zero visibility of traffic co0ming South. Can you do something useful about this rather than trying to get more income from parking charges?
WG Outer	Yes	More control needed as people drive in and park - the driver stays in the car while others do the shopping. This means I sometimes can't park near my house
WG Outer	Yes	More cycling infrastructure please

WG Outer	No	More pay-to-park needed because not all households have VP vouchers or they run out and then their visitors have a problem to park
WG Outer	Yes	More wardens needed. Some days they only turn up once. I fully support the changes
WG Outer	No	more zones is not the answer to the problems that wood green faces - the original inner/outer zones were sufficient. adding more zones has only caused problems for those who are at the edges of the zones. creating more zones will cause more problems. the freedom to move around within the wood green outer zone is of great benefit to elderly people who drive from the edges of the zones to closer to wood green high road to do their weekly shopping. to add these new zones would be a prejudice against those who's mobility and ability to carry groceries is limited by old age.
WG Outer	No	Muswell Hill and Hornsey have much shorter hours. I wonder if any consultation is actually listened to? Restricting short journeys to Wood Green will kill off the High Street even more and just encourage more people to use Amazon in order to avoid hassle. I worry about the affect of this including on vulnerable people
WG Outer	Yes	My current resident permit runs out 31 August. Should I await a reminder?
WG Outer	No	My main concern regarding traffic in my road is the excessive speed at which vehicles drive despite the 20 miles per hour limit.
WG Outer	Yes	My partner livs in Hornsey and we share an electric car. Is there any way where we could both have a parking permit?
WG Outer	No	need a proper efficient permit issuing system to support: new car purchase, courtesy cars, service calls e.g builders. Limit of 2 concurrent permits makes this difficult. Cost of permits for long stays (such as building work) needs to be contained. Having a single enlarged inner zone will encourage more commuter parking.
WG Outer	No	Need longer times to stop shop staff parking. We need parking wardens to actually attend. Trade vans are a problem parkign to use the cafe.
WG Outer	No	Need many more bikehangars
WG Outer	Yes	Need many more on street EVCPs - and this should include access points in street lamps. Park Avenue needs speed humps. Heavy lorries use this road and they should use Station Road instead
WG Outer	Yes	Need more bike sheds
WG Outer	Yes	need more controls because lots of cars park badly on the curve and non-local cars also come in and park. Also, cars enter through the barrier (locks broken regularly) to access Willow Walk (from Milton Rd) . Please help us control our roads better
WG Outer	Yes	Need more EVCPs - go for the ones on street lamp posts that are now available. A few CPs on Rusper would help new EV owners
WG Outer	No	Need more ph EVs - we will be purchasing a phev and without driveways, charging is a problem
WG Outer	No	Need rollout of cycle hangars to support your transport strategy. Wightman Rd has become unfriendly for pedestrians and cyclists with traffic speeding.
WG Outer	No	New residents in the "ForeverGreenLanes" Evergreen development (supposedly car free) will find a way to get resident permits for 00s of extra cars in my local roads. Your proposals will have even more negative affect on available parkign space in roads close to my address.
WG Outer	No	No changes needed. It would make life difficult for the elderly las well as restricting friends, family and carer visits. The only ones to benefit would be Haringey council as it would make more money. I hope Haringey can try to see the wider picture in this.
WG Outer	No	No changes wanted

WG Outer	No	No difficulty parking here and need friends and family to visit easily. I am elderly, pay huge council tax, and for costly permits, so it is scandalous to try and inflict further charges on families. VP are too expensive and tehre are many elderly and housebound people in this area who need friend and family visits evenings and weekends. Many are not tech savvy and it's also very difficult to book parkign permits on phones. The closure of pay-and-display meters has caused visitors a lot of problems, so they often park illegally
WG Outer	No	No good reasons given for your proposals. Multicar households should not be allowed unlimited parkign permits. It makes no sense to have a large WG central zone including WG and Turnpike Lane tube stations. This is just enlarging the inner zone which is pointless
WG Outer	No	No need for more controls. Other areas limit times to about 2 hours which is more beneficial to shops and businesses. Your proposals would only separate people more - and support is needed at the present time
WG Outer	No	No need for any changes. I support strategies to reduce number of cars, but not these proposed changes
WG Outer	No	No need for extended hours, if anything it should be reduced. Extended times would make it very difficult for family and friends. You have made it more difficult by reducing VP to 1 hour which is totally unfair and adversely affects elderly and disabled, even though permits are at a reduced rate. They are still too expensive and having the limit on numbers also makes it very difficult
WG Outer	No	No need for this. You always want to make our lives more difficult. DO NOT DO IT.
WG Outer	No	No need to change anything. This is an obvious money-making exercise by the council
WG Outer	No	No problems now but your changes would bring problems. We need bikehangars as we and our neighbours have to store bikes inside the house. We've applied for hangar space months ago but it's saturated
WG Outer	No	No problems parkign and ypur proposal is totally unnecessary and pointless.
WG Outer	No	None of the supposed problems cited apply to Barratt Avenue. A much better solution would simply be to separate the Inner and Outer zones. Extending the days and hours would have adverse effect on families and social life. as there would effectively be no time that family and friends could visit without having to buy VP. Also we have hardly seen family and friends because of covid. The service for obtaining parking permits is very poor. Telephone lines are not properly staffed and there are delays in actioning requests for permits. The new arrangements for virtual permits are deliberately making the process even more difficult for residents who are not tech savvy. Please reconsider.
WG Outer	Yes	North Haringey Primary School takes up so much space that there is no advantage to having a CPZ at all. On Sundays, parkign is taken up by churchgoers. Parking spaces on Falkland Road should be allocated to residents only - permits should NOT be distributed to the school so it can take up most of the residential spaces in Falkland Road
WG Outer	No	Not against the principal but are against being included in a CPZ with extended operating hours which will directly inconvenience visitors and services
WG Outer	No	Not fair to penalise those who use cars out of necessity
WG Outer	No	Not sure why you keep trying this on. I need the freedom of movement for shopping and sometimes picking up elderly relatives. The change would allow you to make money from people who are already financially stretched. Please leave the parking permits as they are. We are already paying high council taxes. Please stop trying to make money form us and please, please leave it alone

WG Outer	No	One solution would be to allow 2 hours free parkign for WG Outer residents when going to the Inner zone for shopping, services and facilities. You are penalising those people who live locally but are just outside the Inner zone. I also feel sorry for people who live near the stations because of the big problem of ASB as well as noisy motor cycles used by groups of workers at the fast food takeaways e.g McDonalds. These outlets make the area full of litter and make one feel uncomfortable walking in the area. Thanks
WG Outer	Yes	One thing not mentioned in the consultation but which I think is important is planning for bike storage space. Noel Park (particularly our end of it) is fortunate in still having a lot of parking space, and this provides a good opportunity to invest in bike hangars for storage. There are currently a few of these locally, for example on Hewitt and Mark Roads. I understand there is a waiting list of up to 4 years for a space in one of these locally. If your strategy is, as stated, to encourage more sustainable forms of transport then planning for more of these hangars is essential. The houses in this area have very small gardens and, being in the Article 4 area, technically need permission even for the erection of a garden shed to store bicycles. The southern end of Darwin Road has no houses facing onto it and could easily accommodate a number of hangars -
WG Outer	Yes	One thing which isn't addressed in the consultation is any transition to a reformed CPZ. I assume this would come during later stages. Although I don't own a car, I do make use of visitor parking permits and purchase these. As these are for the Wood Green Outer Zone it would be good to understand the practical proposals to transition into the new Controlled Parking Zones - e.g. would existing visitor parking permits be valid across all 5 CPZs, or would there be an exchange system. I understand there is also separate proposals for an online system for parking permits, which it would be good to set out more clearly and again explain how this works alongside the current paper based system.
WG Outer	No	Only being allowed 1 hour or 1 day visitor permits is really inconvenient - should also be able to get 2 and 3 hours. I don't own a car, I cycle and walk mostly and support environmental policies but the already long hours of the CPZ are inconvenient and discourage car sharing because I have to use loads of visitor permits if I want to borrow or hire a car - this will be worse if hours are extended and then I might as well just get my own car which increases rather than reduces cars parked on my road
WG Outer	No	Only of benefit to Wood Green Central residents
WG Outer	No	Only short hours needed to stop commuters. There are simply too many cars on the road and stopping people making short journeys serves no purpose and will in fact increase internet shopping and the large number of internet delivery vans on the road. I don’t have the answer, and nor do you. BTW please do something useful and stop the proliferation of scooters which are an increasing danger to pedestrians, OAPs and children.
WG Outer	Yes	Our house is by the main road and we get vans and other cars without permits parking here. This makes it hard for our visitors - some of who are disabled, to park here
WG Outer	No	Our road and area often becomes a drag racing circuit. As well as noisy and loitering men hanging about, this is a safety risk for children. If you want to encourage cycling, please provide more bike lockers

WG Outer	No	Our street has no parking issues. The proposed extension taking us into Wood Green Central CPZ (hence extending to 7 days a week & until 10pm) would make the cost of essential visitors (i.e. tradespeople and services) prohibitively expensive - the cost of visitor permits increase annually as it is. By joining the inner CPZ it would likely create new parking issues from a new group of people previously unable to park here. Our street is very quiet and residential, and geographically much closer to either 'The Ladder' or 'Noel Park' CPZs which would be far more suitable than central Wood Green. We do not object to splitting up the larger outer CPZ, our objection is to merging us into a central zone that is not appropriate for our street. Increasing the hours to almost 24/7 will disproportionately affect the poorest and worsen the borough's already stark inequalities, it will
WG Outer	No	Our street is within two housing associations - you should NEVER take it over and bring in traffic wardens. There is an old people's home at the end of our street and many people come to visit their parents. We want Bracknell Close to stay the way it is without traffic wardens. This response is sent from (and signed by) residents of 11 properties in Bracknell Close)
WG Outer	No	Parkign bays are too close to the junction of Raleigh and Wightman roads. Restricts visibility. Loading bays should be added outside Sheridan Court And Wordsworth Court to enable delivery vehicles to unload without getting parking tickets. The closed section of the New River path through Harringay ladder should be opened to pedestrians would encourage more walking and fewer car trips.
WG Outer	No	Parkign is too expensive. Also you need to appreciate that more traffic = fewer thugs and drug dealers hanging around
WG Outer	No	Parking is fine in Wood Green. Any changes would be unfair to residents like me. It's already very expensive for my visitors and made worse by the difficulty contacting Parking Services to buy vouchers
WG Outer	Yes	Parking outside Mosques in Wightman Road on double yellow lines is never challenged. Ditto in Hornsey. Why is this ? I've raised this via Haringey's website and been ignored. If there is religious exemption then that needs to be made clear. The stretch of Green Lane between Frobisher and Falkland Road is abused by cafe users. Why is there no enforcement ?
WG Outer	No	Parking permits should be charge dby vehicle SIZE, not emissions. Thousands of vehicles wit high emissions drive through the borough without any penalty. You need to think seriously about the issue of walking deterrents: children are often robbed or threatened, gangs are rife, drug dealing rampant in locations like Ducketts. You fail to do anything to stop this.
WG Outer	No	Parking restriction will no help us lots of free place around now. Mayor clean air policy ULEZ remove lots of old motor. Spend money on better roads and police office to walk about.
WG Outer	No	Pay lots of council tax but getting VP permits is very difficult
WG Outer	No	Penalising residents is not the answer. 6 flats in Alice Ct are not permitted to use the car park. If annual permit cost is reduced to reflect the smaller areas, this would be more acceptable
WG Outer	No	People need to be able to shop feely in Wood Green and promote the businesses and shops. It would eb scandalous for you to destroy them
WG Outer	Yes	People often park inconsiderately and take up 2 spaces. Spaces should be painted
WG Outer	No	People would still park and go to work. Proposals would create social isolation and VPs are both limited and expensive. I strongly disagree with your proposals.
WG Outer	Yes	Permits and charges are too expensive and there are no allowances for older people
WG Outer	No	PERMIT PARKING DOING WELL ON THIS AREA. THE OTHER PROBLEM NOW IS THAT PEOPLE RIDING THE ELECTRIC SCOOTER ON PAVEMENT. CAN COUNCIL DO THE ANYTHING TO STOP IT?
WG Outer	No	Please be aware that many elders rely on the car for essential local journeys

WG Outer	No	Please change the parking zone for 158 Westbury Avenue from "Wood Green Outer" to "Belmont" as the entrance to the ground floor maisonette property is not on Westbury Avenue but on Crawley Road, which is in the Belmont parking zone, and this is the only sensible place for our property to have a resident's or visitor's spot. It is a nuisance to have to park 3 streets away when there are spots directly adjoining our actual property available 24/7. It's also a potential nuisance to our neighbours, if our car alarm goes off we will be unable to hear it. It's potentially dangerous, as the nearest place to park in Wood Green Outer is in Noel Park which is across Westbury Avenue, as I'm sure you're aware there are many drivers going too fast on this road and we are right at the blind bend where there have been many road traffic collisions.
WG Outer	No	Please clarify if and how the views of local residents and businesses will be taken into account within this consultation process.
WG Outer	No	Please do not bring these new changes into effect. just increase the times of operations on the current Inner and Outer Zones.
WG Outer	No	Please do not change the parking permits.
WG Outer	No	Please do not implement the changes proposed. It is obvious that Haringey Council are just using the excuse of their Transport Strategy to gouge yet more money from their residents. Many local people have lost their jobs due to the SARS-Covid2-2019 Pandemic and consequent lockdowns Many elderly people really crave regular visits from relatives after not being able to socialize for over 18 months. Please consider the mental health of so many people previously isolated. Also the increasing cost of residential parking permits and also visitor parking permits will affect those who can least afford it in these testing times.
WG Outer	No	Please do NOT make these changes. Monday to Saturday 8am - 6.30 pm is fine. Thank you
WG Outer	No	Please do not penalise the motorist any mlre and please do not use this as a money making scheme
WG Outer	No	Please do something about people putting bins and cones out to 'reserve' spaces. This creates arguments between neighbours. I believe dividing Wood Green Outer into 5 zones is wrong. I need to drive to my GP, the post office as I have chronic back pain. Currently it is easy. Your proposal will make life difficult for many.
WG Outer	No	Please don't make more barriers for parking. I don't have a car but do have visitors in the evenings and on Sundays. Permits are very expensive anyway
WG Outer	No	Please don't split our neighbourhood links with these false boundaries
WG Outer	Yes	Please implement ASAP. There have already been several consultations on this
WG Outer	No	Please leave the parkign system as it is - especially now with covid leaving people on furlough or reduced wages. It is not exactly the right time for this sort of thing. I understand that residents near the shopping centre and tube stations may face people parking in thir residential space, this should NOT result in changes for other residents. Also I do not agree with your statements about parking issues. You need to appreciate that many people have mobility issues but do not qualify for blue badges, but still need to drive for shopping and services. They will be further isolated as a result of your proposals. Please do NOT implement these proposals
WG Outer	No	Please leave the Outer zone as it is and do not extend times
WG Outer	No	please leave the parking the way it is . i don’t see any necessary reason why it should be changed
WG Outer	No	Please leave things as they are, we are not cash machines
WG Outer	Yes	Please make it more difficult for people to keep and drive a car in Wood Green. It is dangerous for everybody else and destroys community
WG Outer	No	Please read my detailed response in Q6

WG Outer	No	Please see earlier comments about why I do not support the changes. The current zonal parking system for the Wood Green area is most effective in managing parking in this area and does NOT need to be changed. This appears to be a revenue generating scheme. -Residents will have less areas in which they can park but no reduction in parking permit charges. -There will be an increase in the issue of parking penalty notices. The negatives outweigh the positives.
WG Outer	No	Please spend money on police officer to walk the street this will avoid crime on our streets. Playing around with parking will not help us in Haringey. We are an aging population in this borough we need to move around in our borough don't punish us in our own borough.
WG Outer	No	Post office vans clutter up Terrick road and don't have permits
WG Outer	No	Prefer it to stay as is. I only park in my road behind Wood Green and have no use for Haringey ladder or that side of Green Lanes. Thank you for considering the views of your elderly residents
WG Outer	No	Proposals are designed to make money for the council. This is not fair at all
WG Outer	No	Proposals are quite unnecessary. We already pay a huge amount for permits and the roads are riddled with potholes. No sign of money being spent usefully
WG Outer	No	Proposals are unnecessary, would be very inconvenient and cause frustration with the council
WG Outer	No	Proposals do not guarantee a parkign space and of no benefit to us - just a way to make more money for yourselves. Russell Ave is a very quiet road and a lot of elders live here who need to have family visits. I do not agree with the proposals
WG Outer	No	Proposals ignore vulnerable people who need to use cars instead of public transport. I understand the desire to reduce car use, but this is a step too far
WG Outer	No	Proposed changes to a system that generally works well are unnecessary and would waste public money that could be better spent elsewhere. It would make life even more difficult for people to see their family and friends especially now during the pandemic. I personally prefer to walk rather than take public transport exposing myself and my family to the virus. However, there are times when I need to drive in order to fit everything into a busy working/ studying/ caring for my disabled husband/ home life. For our household driving is a necessity not a luxury. Loosing the ability to park anywhere within the Wood Green, would stop me from shopping locally. Buying groceries from the market or Wood Green high road requires driving in order to carry all the shopping. This would only push me towards big supermarkets where parking is free. The council should be supporting local busi
WG Outer	No	Proposed limit of the central zone is too close to St Michaels Terrace and thsi road woudl be used as an overnight parking lot, and also by train users
WG Outer	No	Proposed measures will not fix the problem of too many cars. It will just generate revenue for council, while penalising those that can't / elderly people.
WG Outer	No	Putting Turnpike Lane into the central area undermines any positive aspects People who l ive in Noel Park and want to drive to Wood Green for the weekly shop will now have to pay. Absolutely not.
WG Outer	No	Rather than admitting to losing some of its parkign revenue as a result of covid, you have issued a consultation claiming that there are issues with commuter and other parkign neat Turnpike Lane station that are causing ASB. ASB has nothing to do with parking or commuters but everything to do with an incompetent council that is not able to manage parking effectively. What are needed are more managed car parks across Haringey so that - for example - tenants can park outside their homes and have loved ones visit them. Loneliness is on the rise and people do have problems parking when visiting elderly relatives, so the council should find another strategy to deal with the problem rather than irritating the public who pay council tax, road tax and permits that only allow 1 hour stays.

WG Outer	No	Re Q11 (More short term visitor parking), There is no need as long as the council retains the residents' visitors parking permit scheme. West Green road has thsi facility so no need for more pay-to-park bays. There are plenty of spaces when I viist my mother and take her to the medical centre and other facilities
WG Outer	Yes	Really concerned that the new housing developments on Green Lanes are going to severely impact parking in our area. It's already difficult as people come to Green Lanes shops and restaurants in the evening. New housing developments should be required to provide enough parking provision
WG Outer	No	Reduce permit costs in line with freedom travel pass. Some elders are less able to walk or cycle but do not qualify for a blue badge. It seems unfair to charge them twice. Would only support proposals if older residents were charged less for parking permits
WG Outer	No	Reduce times to 10am - 12noon
WG Outer	Yes	Residents from Inner zone - Morley and Farrant avenues often leave cars in our road overnight and at weekends. This is unfair on those who pay. One of these Inner Zone residents even asked me to move my car so he could squeeze his in. I said no and he then called me an old bag. Please can you ensure that the residents of Morley and Farrant show some respect for the rest of us that pay.
WG Outer	No	Residents should have some freedom to move around. Proposals are too restrictive. as I often park in Langham Place and then walk through the gap to get to Mannock Rd. You woudl stop this even though my house is only a few feet away. Please do not look for revenue streams over the well-being of residents. No change wanted or needed
WG Outer	Yes	Roads near Turnpike Lane station are busy . We'd like more space to be allocated to Car Clubs, bike hangars and EVCP
WG Outer	No	Selborne Rd is used as a short cut - there are daily incidents of road rage with arguments and people fighting. Cars and vans using Selborne as a cut through drive fast and aggressively. Also a big noise problem from extremely loud bikes and cars which cruise up and down every evening and into the night - especially at weekends. Always the same drivers. Why is this not being dealt with? The noise scares children, animals and wildlife and keeps us awake.
WG Outer	Yes	Selborne Road becomes congested during weekdays between 3:30pm and 6pm
WG Outer	Yes	Since the switch to Ringgo you should also allow online VP permits to be processed through the app (like Islington). Paper tickets are slow to arrive and not necessary now it can be done online. Current 30mph speed limit on Lordship, Westbury, and Downhills Way should be reduced to 20mph as far too many cars speed over 30. There should be no parkign between Turnpike Lane and the main part of Green Lanes as it causes sever congestion as the bus lanes end intermittently, and cars turn in the road blocking traffic flow. Also very dangerous for cyclists
WG Outer	Yes	Some vehicles take up more than 1 space on Frome Rd
WG Outer	No	Sort the drains out please. The flooding is ridiculous.
WG Outer	No	SPLITTING THE WOOD GREEN ZONE INTO NUMEROUS SMALLER ZONE IS A WASTE OF TIME AND MERELY A MONEY GRABBING EXERCISE. IT WILL BE INTERESTING TO SEE THE PERCENTAGE OF HOUSEHOLDS IN THE HARRINGAY WARD WHO HAVE A VEHICLE. IN THE 2011 CENSUS IT WAS 31% WE HAVE TO ENGAGE IN ACTIVE TRAVEL IN A STINKING, POLLUTED MORASS CREATED BY SUSTAINABLE TRANSPORT. A SHARPER INCREASE IN RESIDENTS CAR PARKING PERMITS WOULD BE A BETTER WAY TO GO ESPECIALLY IF THERE IS A FURTHER FALL IN CAR OWNERSHIP ACROSS THE CPZ. USING THE EXCUSE OF ACTIVE TRANSPORT FOR HACKING UP THE CPZ WHILE ADDING TO THE RAT-RUNNING ISSUE IN THIS AREA IS FUNDAMENTALLY DISHONEST AND HYPOCRITICAL ACT BY SUSTAINABLE TRANSPORT AND THE COUNCIL AS A WHOLE.

WG Outer	No	stop trying to bring in so many changes to roads at the same time. This is happening at the same time as the proposed Low traffic neighbourhood and the ULEZ, which will no doubt bring in their own unforeseen problems and have major impacts on the roads. why not wait and see how one scheme impacts before trying another one? you will not be able to fully monitor the impact of a scheme when you are changing so many variables and therefore any results you get will be skewed and invalid. also this feels like another way to get more income for the borough through parking enforcement schemes. stop penalising people with cars; some of us actually need them to help disabled relatives or get kids to activities (that may not be provided locally). Haringey is becoming a real nanny state to live in, and i have lived here for many many years. There are better things to spend your money on
WG Outer	No	Strongly against these proposals as a resident of Wood Green N22, I want to keep access to all local roads
WG Outer	No	Strongly against your proposals as already stated. They would adversely impact: local residents by limiting access to facilities and visitors; Impact on local businesses already struggling; impact on elderly by restricting access to shops and services as well as carers; would deter investment in the local economy.
WG Outer	No	Suggest to split the areas containing stations to discourage 'local' journeys. This would reduce the amount of cross area travel
WG Outer	Yes	Sundays is a problem with people coming in for cafes, church services, shopping and just to hand out. It is noisy and means that my visitors find it difficult to park, Rest of the week is OK
WG Outer	No	Sundays would restrict families spending time together. Your proposed changes would make it much more inconvenient for families to meet up. Please take this into consideration
WG Outer	No	Support fewer cars but how can people use public transport safely when it's very crowded? If you did make these changes, what steps would you take to increase bus frequency? You need to consider the views of those residents who don't own cars (but do have visitors etc.)
WG Outer	Yes	Sydney Rd is close to Turnpike Lane Stn which is used by commuters. We also have a Mosque which adds to parking congestion. Why would we want restrictions extended to Sunday as we would have to buy more VP to have family and friends visit? Some permits are used by people from other parts of the zone, so I agree with having additional smaller zones, but keeping the existing operating days and times on Sydney Rd
WG Outer	No	Take care of residents better and stop letting financial greed influence your decisions over the lives of residents. You need to stop increasing the permit parking prices and start giving residents a reduction.
WG Outer	No	You can't control residents parking in this ridiculous boundary proposal. it's completely unfair and a massive inconvenience. I will be escalating this matter further if i feel that my voice is not being heard TARA is a Haringey recognised and sanctioned Stakeholder. As such Tara wishes as a Residents' Association we are able to do a collective response to this 'feedback' exercise on Parking in Wood Green. We would also like to be contacted in advance before the other stages of the consultation please. As chair of Tara I have attached at the end of this submission our annual registration form for Haringey and our postal address and details, as required, so I hope that means you will take recognise this submission as TARA's What follows is Tara's submission concerning Haringey's letters called 'The Public consultation for the review of parking controls' dated the 19.07.21 and the 'Important information about your residents parking permit' dated July 2021 as hard copy and as an email letter. Firstly the parking controls change consultation process.
WG Outer	No	The convenience of being able to park easily has helped me greatly - especially picking up my mum when shopping in Wood Green Mall
WG Outer	No	The area south of Westbury Avenue should be in the Ladder CPZ - not Wood Green Central / Noel Park

WG Outer	No	The control times is not the issue. the issue is some cars on the road (Milton rd. n15) do not have permits. some cars are being ticketed and some are not. you can also find cars that are not in use being parked in places. Residents buying cars and fixing on the road. Residents from Inca Terrace houses using spaces as mechanic spots to fix cars. A local mechanic 'hitech motors' have several business cars/permits and residents can't find place to park on west green rd.
WG Outer	No	The council needs a comprehensive solution. Boundaries will not be the solution. Being elderly and without a blue badge my friends in inner zone will not be able to visit and I will also be unable to visit them freely.
WG Outer	No	The council shows a complete lack of sensitivity in proposing these changes at a time when families are trying hard to recover financially from covid. It's made worse by the price increases in residents and visitor parking permits. Are these proposals being made by Councillors who actually live in the roads affected?
WG Outer	No	The council's days are numbered. You charge much higher council taxes only to then waste money on looney schemes. Come the next election we want to boot you out. - And this is from a Labour voter
WG Outer	No	The current CPZ have been working fine for years with no issue. It allows us freedom to park in our own area with peace of mind not worrying or needing to check you are in the right zone when needed. If it isn't broke, don't fix it. There are better ways to manage pollution and parking for those in inner zones. If a CPZ needs to be enforced, then only enforce inner zones and outer zones. So, only inner residents can park in the inner zone, and outer residents can only park in outer zones. It'd be best to keep things simple instead of overly complicating matters. Do not create 5 zones. It is a waste of time and a waste of a lot of money for little gain and much more pain for us residents. Another measure to stop people using cars unnecessarily for short distances is to allow electric scooters or e-scooters. 1. They are clean way of travelling with no emissions. 2. Th
WG Outer	No	The current parking controls are effective and for the road where I live no change is currently necessary. Thank you
WG Outer	Yes	The current system of very large CPZs encourages the use of cars for short journeys across the borough. I fully support the change to smaller zones to discourage this.
WG Outer	No	The current system works well. Reduced areas would provide residents with an inferior service. I strongly oppose their introduction. However, should the Council decide to go ahead, then I would expect to see a commensurate reduction in the price of a resident's parking permit to compensate for the fact that parking rights will have been curtailed.
WG Outer	Yes	The Evergreen construction site workers appear to have passes and VP - not business permits. Why do you allow this? I am also concerned that the 134 flats that are being built have no parking spaces provided (so the developer can make more money). There are likely to be 150 cars owned/used by residents in this development, so where are they going to park?
WG Outer	No	The foot way along our road is bad especially next to the tree roots, fix them and this will help older people to walk more safely.
WG Outer	No	The leaflet and map provided was very clear and the reasons given for proposing the changes are compelling, however I still feel that the large costs of implementing such changes cannot be justified at this time.
WG Outer	No	The loss of being able to park anywhere in the Wood Green CPZ will reduce the ability for me to shop locally and mean that I will have to shop further away and use more online shopping. This will impact the local shops and businesses that I currently use. At a time when local High Streets are under so much pressure, this proposal puts further pressure on them by reducing footfall for people who avail of the current CPZ zone to shop locally.

WG Outer	No	The loss of the ability to park anywhere within the Wood Green zone will deter me from shopping locally. Instead I will probably make more purchases online, at out-of-town supermarkets, and at out-of-town centres like Friern Bridge. I would not make such journeys by walking or cycling because of the need to carry shopping. Also a car is often a better choice for comfort (in inclement weather) and security (e.g. on a dark evening). Haringey Council should be supporting businesses in Wood Green town centre rather than introducing measures that reduce footfall. This is particularly important at the moment when local shops have been so badly hit by the pandemic. High Streets are in decline everywhere, and Wood Green will not be immune. Also the Council should not be wasting money making changes to a scheme which in my experience is generally working well.
WG Outer	No	The pandemic has prevented people moving freely with the lockdown restrictions. Now that the situation is improving, older people with disabilities but falling short of blue badge qualification will lose their freedom. The council should instal cameras in problem streets to evidence parking violation and abuse. The only time that it isn't possible to park around the shopping centre is at weekends so that aspect is overstated. To overcome commuters taking up central spaces, time limits should be imposed.
WG Outer	No	The parking department at the Council has been responsible for an environmental disaster in the borough with the paving over of literally thousands of front gardens Nothing about the parking "projects" is green. And it's disgraceful that the councils hides behind the green agenda in an attempt to fleece people of millions through fines !.. You also have an Orwellian bureaucratic nightmare with the Parking Office blaming the Councils Planning Dept for this catastrophe ..and vice versa ! Please stop hiding behind a "green banner" and start running this service (?) for the benefit off the people of the borough The only reason the Council want to bring the changes proposed is to increase revenue from fines Parking in the borough is deliberately complicated and incompetently run and needs a full review before any new proposals are considered
WG Outer	No	The parking is good enough for us, make the footway good for elderly people like me. give us more police to stop crime in this area.
WG Outer	No	The proposed changes are short-sighted. They will curtail free movement and reduce the number of visitors to local businesses. They are seemingly designed to increase revenue generation, not to deliver any of the supposed benefits cited in the consultation overview.
WG Outer	No	The proposed changes to residents parking would negatively affect my family's right to practice our religion and our ability to support the local shops of Wood Green. Therefore they are an attack on our culture and our ageing residents independence. Local businesses and residents will suffer as a result of these unnecessary changes if they are enforced.
WG Outer	No	The proposed changes to the Wood Green CPZ have been going on for years. It's such a shame Haringey council didn't use this time to design and create an infrastructure for the future - electric car hire/use, cycling and walking. On the one hand the council make statements about the need to improve air quality and the health of its residents by reducing car use, but on other, the council offers little or no real viable and safe alternatives. This makes me question the councils motives for putting forward changes to the Wood Green CPZ scheme. The CPZ zones and parking regulations raise millions pounds in extra revenue for Haringey council. Maybe this is why Haringey council seem slow and reluctant to invest in and provide the resources for cleaner alternative modes of transport.
WG Outer	No	The proposed changes would cause nuisance and aggravation to local residents; restricting access to wood green. There is a financial burden that will ultimately fall on Haringey residents to make the changes to a system that already works perfectly well. The changes will cost money far better utilised, and its aims will not be achieved. It would increase congestion and smog in the area by forcing users of current system to travel further away and not support the local businesses.

WG Outer	No	The proposed changes would further hurt small businesses already under a lot of strain. What we need is better enforcement of current rules. Fake blue badge holders and permit-less parking of vans in side streets are both rampant. Please allow businesses to flourish by keeping the current CPZ arrangements and increasing enforcement of the existing rules instead.
WG Outer	No	The public consultation document attributes anti-social behaviour close to Turnpike Lane to commuter parking and offers that as a reason for the zone changes. There is clearly anti-social behaviour around Turnpike Lane station in particular drug dealing and loitering, but don't agree this has anything to do with commuter parking. Residents of Carlingford, Stanmore and Waldeck roads all took part in traffic calming consultations run for the Council by Sustrans in 2010-11 and said clearly then that any kind of 'hub' close to Turnpike Lane tube station should be avoided. Not long after (a year or two after the Sustrans traffic calming and other hub measures) a much a larger pedestrian space was created behind the station, which has created a focal point/milling around area. Problems with cars close to the station tend to be cars waiting to collect people (i.e. the drivers w
WG Outer	No	The split is too small and divides out community, no benefit doing this it is to make money not to promote waking and cycling. This will be bad for our community and business in Haringey. TfL ULEZ scheme will get rid of old and high emission vehicles. I did not see any new and safe cycle routes in this area, walking is a risk any way, we need more police physical presence to deter crime.
WG Outer	No	The zone should be left as it is. I personally don't see any parking issues in the 3 years I've worked here. Inner zone hours are very long but it is understandable so that it serves residents
WG Outer	No	There are no current problems with the cpz
WG Outer	No	There are no problems with the existing controls and the proposed changes are not necessary
WG Outer	No	There are too many parkign controls at Tottm Stadium. Stadium visitors must be allowed some free parking. Current WG zones are good, no change needed
WG Outer	No	There has to be a better way to deal with parking other than cpz Cheaper pay to park for Haringey residents. Visitors from another borough should pay more perhaps?.
WG Outer	No	There is no need for any of this. It will only lead to more penalty tickets - which is probably the idea behind this.
WG Outer	No	There is a likelihood of extending the hours will move congestion into neighbouring areas.
WG Outer	Yes	There is a lot of speeding in what is a set of quiet residential roads, sometimes dangerous – could this be controlled more? It is very hard to find safe parking for bicycles (long waitlist for hangar scheme, too much bike theft/part theft for “open” parking). As someone fron a household which doesn’t own a car this is especially frustrating considering we don’t take up any parking space but daily cycling is made very difficult due to the lack of parking
WG Outer	No	There is no good reason to make these changes other than to increase revenue for the council. We are already paying through the nose with council tax and parking permits. Paragraph the current CPZ are completely fine as they are. Changing them will shrink the amount of places on I’ll have to park in my current address in out of Woodgreen and Noel Park looks ridiculous. Just think this is a clear money making exercise and I really think Council needs to come up with more income generating schemes other than just hammering the motorist over the head. If you look around this borough there are clear places that are absolutely disgusting and full of litter because there is no education anywhere about it and there is no bins on the streets in certain areas it’s pristine in the wealthy and part of the borough and the poorer part of the borough litter is a real problem

WG Outer	No	There is no need for the inner zone to be extended so far down Langham Road as the times are very restrictive of carers and visitors to the area. this seems like a money-making exercise as the cost of parking permits, hourly and daily are going up before this will be implemented. There is no problem parking further than 500 meters from the station and most of the problems are caused by minicabs parked around the station and parking attendants not moving them on.
WG Outer	Yes	There needs to be a simpler way of getting parking permits. Website is poorly designed and at times glitchy so that means a visit and long wait at the customer service centre
WG Outer	No	There seems to be a move to reclassify part of Langham Road from outer Wood Green to inner - reducing parking opportunities up to 10.00pm and on Sundays. This will just discourage visitors to the area. It's hard for me to see who this benefits other than those employed to raise money through fines and the council coffers. Parking restrictions in Haringey are already more restrictive than in some inner London boroughs such as Camden. I don't agree at all with what you're trying to do but if you are trying to control parking near the tube stations, then why in earth have you created a new Ladder Zone that very closely borders it.
WG Outer	No	There's a loading bay in Westbury Ave which, when used, blocks traffic because there is not enough space for large vehicles because of cars parked both sides of the road. Moving the bay a few yards into Rusper Rd would avoid a daily traffic jam
WG Outer	Yes	There's a DB outside 37 Lausanne Rd but the person has moved. It would be helpful if the DB could be removed
WG Outer	No	There's a lot of traffic coming to and from Hornsey Park Rd and as the road is quite narrow, it can be difficult to turn with a big car
WG Outer	No	These changes will make it very hard to have visitors without paying a lot more for VP. Proposals wil also affect local carers who have a vital health role to play
WG Outer	No	This appears to be a done deal. Who pays you to come up with these hare-brained schemes? It's money making and drivers will pay the price
WG Outer	No	This consultation is poorly designed as it does not differentiate between car and non car owners. It makes no reference to people’s age or degree of mobility. I feel these proposals are just another way for the Council to raise revenue at the expense of its residents, who have already suffered austerity measures. I strongly oppose these proposals both now and in the future.
WG Outer	No	This is a flawed plan. You are opening this up for consultation, but we all know that you will go ahead with this anyway regardless of the outcome of the consultation.
WG Outer	No	This is a quiet road . THFC is never an issue. How would people know anyway? So, No thank you.
WG Outer	No	This is being proposed simply because of a council budget shortfall. We have all suffered during covid and it's not fair to attack car owners because of a budget shortfall. A car is a necessity -- not a luxury. I use mine to take my parents out but it will cost me more - I'm a carer. Car drivers are cash cards for Haringey
WG Outer	No	This is just to make money
WG Outer	No	This is money-making. It will the High Road shops which will then consist just of bookies and charity shops. People will go out to shopping centres with free parking. It is ludicrous to suggest that parking leads to ASB. Walking may be easy for young people but much more difficult for elders
WG Outer	No	This is overkill. Short trips in the borough do not increase carbon emissions much. The real problem is parking congestion largely caused by the supposedly environmentally friendly road schemes (LTNs) started by Enfield council. These have pushed even more traffic into Haringey.
WG Outer	No	This is spoiling our community by fragmenting it into artificial areas
WG Outer	No	This new scheme would do nothing for residents but is just a cash cow coming at the same time as ULEZ. It will make money for the council to waste

WG Outer	No	This proposal does nothing except try to squeeze even more money from Haringey residents. This on top of other recent changes like the refusal to exchange/refund unused visitor permits, which we have little choice other than to buy. It will do nothing to deter out of borough visitors for whom there will be no real change. I wholly and strongly oppose this proposal.
WG Outer	No	This proposal for 5 new parking zones with no flexibility for residents to park in neighbouring zones could be adapted to take a more sophisticated and acceptable approach if Haringey wishes to impact existing residents in these zones enjoying commuter parking near to Wood Green and Turnpike Lane stations. (Is there evidence to support that this is happening legitimately under the scheme as opposed to people abusing the existing scheme?) One approach would be to allow residents living in these zones up to 30 free on-line visitor parking permits (up to 2 hours) in the neighbouring zones with their annual resident's parking permit or perhaps 20 permits for free and 20 on a paid for basis. This would enable some flexibility in relation to parking in order to attend medical appointments, for example. With greater automation of parking permits and pay-to-park, this might be a
WG Outer	No	This scheme unfairly impacts on poorer people. Times are punitive compared with more affluent areas which have commuter parking. I would like to see a much fairer system applied
WG Outer	No	This will enable you to charge more and make money while still leaving roads in bad condition.
WG Outer	No	This will make problems for your residents not help them.
WG Outer	No	This would divide our local area where we are building a local community. This plan of breaking up the Outer zone into 5 makes a mockery of communities - drivers will be confused about what zone they have entered. We do not identify with "Noel Park" - we are in West Green ward. Our home and vehicle insurance rates wil increase because of the recorded higher crime rate sin Noel Park. Covid has reminded us of the need to build communities and close neighbourhoods. PLEASE spare us from these proposed actions and allocate the money to supporting children, older people, and homeless people. As far as parkign is concerned, just strengthen current enforcement
WG Outer	No	This would make it very difficult for friends and family visiting. No benefits for residents
WG Outer	No	This would just generate more money for the council. I hope people remember this at the next election
WG Outer	No	This would reduce access to critical council services and make it difficult to park near local schools and nurseries without getting ticketed. proposed Woodside South CPZ includes only a single EVCP!! and it removes the chance to wait for a space at other currently available locations. This could limit EV adoption in the area
WG Outer	No	This is a money-making exercise. Proposal would restrict me greatly (see previous comments). This will also affect local businesses who are already struggling. Crouch End businesses are well supported by parkign arrangements so why are we in the firing line? Your changes would mean I could only drive to a very few roads but I would still have to pay over £160 plus all the visitor permits. I live alone and need friends visiting. I would really appreciate it if my views are taken into account.
WG Outer	No	This is a ridiculous suggestion - with no value to residents, who would in future drive to shops and services out of the area because we would not be able to drive to and park in Wood Green town centre are to shop and use the Tube. You would be much better off doing something useful like road and pavement repairs
WG Outer	No	This seems very hostile to residents. It would make the area undesirable to live in. I understand the environmental objectives but this would just add costs for visitors and tradespeople as well as those with limited mobility and limited financial means. I get the impression that the council is not concerned with residents but is only interested in generating income. However, if you want to attract families and stability to the area, you need to think more about the needs of residents

WG Outer	No	To include Langham and Carlingford and just half of Waldeck Road is scandalous. We have never been considered part of the Green Lanes ladder- - and teh roads don't even connect. I have elderly relatives with mobility issues who rely on their vehicles to do shopping and visits. The proposals are unfair, unreasonable and unrealistic. Several businesses leave vehicles parked - taking up valuable space. Hitec garage on West Green Road is a major culprit and parks numerous cars here.
WG Outer	Yes	To tackle ASB and drug dealing, in Wood Green Central area, suggest extending hours to midnight and ensure that wardens actually work during these times. Bedford Rd and otehr roads near Ally Pally are suffering a lot form ASB and people gathering en masse at night. Traffic wardens wil need to actually work during the extended times.
WG Outer	No	Totally disagree with your scheme. We only make short car trips for shops and services if it is essential to do so. Your plans penalise working families in terms of expense, time and convenience. There is no sensible reason given for these proposals, and what reasons are given contradict themselves. As a car owner with zero parkign problems living in a street of flats with only on-street parking; I also question the legitimacy of the 'parking problems' you have suggested
WG Outer	No	Totally unfair that you have increased the price of the 2-hour and one day permits, while also reducing the number of permits a householder can have. Also you have made it difficult for anyone who is not internet-savvy to apply for permits. This consultation is a farce as you will do what you want to do regardless of residents'' views
WG Outer	No	Tottenham Hotspur does increase parking pressure in North Tottenham but not where I live, that work and review should be completed with those residents intensively. Parking on my road had never been a problem and the current system works fine for me. I have always found the parking permit to be expensive but as I have a broad zone and can use it when shopping I felt it was value for money. If the zone changes I would like the operational times to be reduced in line with neighbouring zones like 10-2 Monday to Friday as the current time of 08:00-6:30 Mon-Sat can impact on visitors but as I said as I have a broad zone I take that on board. Without a broad zone I feel like a compromise should be made and residents should be able to make a saving on visitor permits.
WG Outer	No	Try to organise a visible police presence rather than creating more CPZs. Also how about stopping cycling and electric scootering on the pavements? Aren't pavements meant for pedestrians?
WG Outer	No	VPs are a an expense most of us could do without. I'm near Turnpike Lane station and you only need a 2-hour CPZ to stop commuter and all-day parking. All day restrictions is just a revenue stream for the council. You also have a shambolic online permit renewal system which doesn't work. I've always had to apply by post. You should give some thought to the needs of carers, nannies, cleaners, gardeners and other services who need cars for work and to transport materials and baggage.
WG Outer	No	We already pay so much money for parkign. Instead of helping us, you want to make it harder. We pay so many taxes. Please leave things how they are now.
WG Outer	No	We are a young couple with a baby and rely heavily on being able to drive locally to collect medicines from the local pharmacy in Wood Green, baby milk and food from the high street and so on. Any tightening of restrictions is completely unjustifiable in our view and these proposals have come at the most inappropriate time given the current state of mental health and the local economy.
WG Outer	Yes	We are elderly and strongly object to the proposals as they would make us house bound rather than be able to travel to the local shops. We are happy with the current system and we would NOT allow our freedoms to be taken away in this way.

		We do require some kind of controlled parking in a Langham Road. And I am happy to pay for visitor parking as per the current arrangements. This is enough to stop drivers using us as a car park and taking the tube. But why do we have to make it even more inconvenient for visitors by extending the hours?
WG Outer	No	My elderly parents cannot use public transport when they visit. So now I will have to pay for visitor parking, even on a Sunday. Maybe I should just get a car and visit them? But it's annoying to be forced to get a car when we're trying to be green and rely on bikes and public transport. I just don't see the point of increasing the current restrictions
WG Outer	Yes	We don't need more pay-to-park but we do need to be able to get visitor permits on demand online to print at home at short notice. We always know in advance when for example we might need to call a plumber!
WG Outer	No	We don't shop online, we use the real shops in Wood Green. We take relatives shopping sometimes. We only use the car when we need to get many or heavy items. We need the flexibility. In Highgate residents can park near the shops after mid-day.
WG Outer	No	We hear that permit prices will be increased. Your proposals would reduce the value of permits. My partner has asbestosis but cannot yet get a blue badge. He does need to drive to shop in Wood Green and this would be very difficult under your proposals and would be much more expensive - and difficult for us to afford. I fail to recognise or understand your comments about parking issues at the tube stations, or that it is difficult for residents to park. We have never encountered this problem.
WG Outer	Yes	We need a safe cycle route on the main route up through Green Lanes to Wood Green. Currently it's a cycling nightmare
WG Outer	No	We need bike parking.. We've applied but are 300th on the waiting list. Graham Rd has a beautiful green which is spoilt by cars parked up on all 3 sides. There is no shortage of parkign space so why not restrict parkign around this attractive green (see example illustration)
WG Outer	No	We pay to use local amenities and we should not have to pay again to use our vehicles to access these amenities
WG Outer	No	We provide child care to family who are in Woodside South. We are in the Ladder, and the children' school is in WG Central. These new boundaries will make life much more difficult especially after the recent loss of a young family member. Being able to drive and park to manage shopping, childcare and health is very important and would be severely restricted by your proposals. (See form for full detail)
WG Outer	No	We rent this house and don't have a car. Thank you
WG Outer	No	We strongly object to any additional parking restrictions or changes in the Wood Green Inner and Outer CPZ areas. We prefer the current system to remain in place. We do not support the introduction of multiple zones and believe it would negatively impact on the trade of local businesses and the mental health and well being of the local residents who have been looking forward to enjoying their long awaited freedoms following a difficult 18 months (still ongoing) restrictions, lockdowns etc. due to the pandemic.
WG Outer	No	We would not be able to go to our GP surgery or the tube stations etc. without paying twice. We would also have to pay to use Morrisons and the Mall car park. We have people with disabilities who can't use public transport all the time. Part of my road woudl be in a different zone. Please don; t put these new CPZ zones in place. You charge too much and we are entirely opposed to these proposals
WG Outer	No	We would prefer no restrictions as paying for the permits is an inconvenience
WG Outer	Yes	We'd welcome EVCPs on Boundary and Rusper
WG Outer	No	What about elderly, and disabled residents who need a car for everyday activities. Your proposals are another disgrace - pretending to help with residents' lives when in fact just trying to make money.

WG Outer	No	What is your argument for doing this? Please share with residents. This change would be expensive for us, although there would be a lot more fines for people making errors. The reasons you suggest are not convincing and current zones are not a problem for us
WG Outer	No	What would be much more relevant would be increased cycle parking and safe cycle lanes. Cars kill children. We need fewer of them
WG Outer	No	When is a meeting scheduled that the public can attend to voice opinion?
WG Outer	No	When the area is safe this could be reconsidered, until then it feels as though we are being made to pay for our own safety.
WG Outer	No	When the pollution charge is imposed on the electorate in October there will be a lot of people with perfectly good older vehicles will find there vehicles worthless, as they will not be able to pay £12.50 a day for the privilege of driving them. This new charge will remove a lot of vehicles from the roads which will free up many parking spaces & make these new CPZ proposals unnecessary. This will also mean that a lot of people will not be able to afford a reasonably priced perfectly good older vehicle in the future, thus these parking spaces will be made available permanently.
WG Outer	No	Where there are additional parking restrictions for event days then the council should make it clear in all of those affected bays when the event days are. It shouldn't be for an individual to see a sign that simply refers to "event days" and have no idea what events are being referred to.
WG Outer	No	While i understand the environmental and safety concerns around traffic on residential roads, I feel strongly that in the current financial climate Haringey should not be using our council tax money on this scheme at this present moment. There are so many things Haringey residents need money spent on, including improving our schools, clubs for our young people, more facilities for the elderly, street cleaning, housing, etc. The present system works perfectly well. As someone in my late 60s who has lived and worked in the borough for all of my adult life I am not as fit as I once was. I use my car to visit my two grandchildren (aged 2 years and 3 months) on the other side of the borough. I look after them and take them out and about to local facilities, to visit our many friends locally and to visit different local parks and playgrounds. I simply would not be able to do wh
WG Outer	No	While splitting the zones might reduce short car trips, the inclusion of our road in the central area would have longer operating periods thereby creating difficulty for friends and family visits. We currently have no difficulty with parking
WG Outer	Yes	Why are the wealthiest parts of the borough free from many CPZ controls?
WG Outer	No	Why are we the only road without speed humps? This, despite Boundary Rd having a park entrance to Belmont Infant school! You've turned our once quiet road into a rat run for speeding cars and motorbikes.
WG Outer	No	Why are you trying to do this? I and neighbours have access to shops and there is no parking difficulty. Some say that this is a money / racket scheme for the council. I hope it isn't.
WG Outer	No	Why can't Haringey Council leave the parking the way it is. We pay enough money to park in the road as it is.
WG Outer	No	Why change the parking areas available for residents. I often drive my girls to school and can park there. Your proposals would place the school in a different zone, so I have no idea how I would take them to school and then get to work on time.
WG Outer	No	Why do you not offer reduced hours as a choice? It appears this is aimed more at the council getting more revenue for itself rather than listening to residents.
WG Outer	No	Why expand the Inner Zone to include Langham, Carlingford etc. This would push more parking on to the Ladder

WG Outer	No	Why not give Turnpike Lane roads behind the tube their own zone then we could keep 8.30am to 6.30pm. Alternatively, make us part of the Ladder. You propose to split up Langham Rd anyway and put the top East part in the Ladder.
WG Outer	No	Why not issue a more targeted ticket type for those closest to tube stations. There is already pay-to-park near the tubes. Your proposal will just isolate people from visiting friends, family and carers. Not everybody can afford to pay for extra VP (which are already on restricted issue). I visit a lot of friends in Wood Green and you will make it more difficult
WG Outer	No	With the introduction of new policies and regulations to adopt electric vehicles in London, it would be very much appreciated if the Council could install some charging points on Perth Road and the Scotch Estate generally. Additionally, some cycle parking lock-ups to encourage more cycling. Also, perhaps a dedicated cycle lane? More generally, the traffic and speed of vehicles on Perth Road is a huge concern. There have already been tragic deaths which could have been avoided if additional safety measures had been designed in.
WG Outer	No	With this purpose I have lost faith in the council. This is a clear attempt to cash cow drivers further limiting their range of movements.
WG Outer	No	Would not be fair on pensioners or disabled people who don't qualify for blue badges. Current scheme facilitates shopping and visitors. People like this fall through the net as far as central and local government are concerned. All the council seems to do is to try and squeeze more money out of residents. Surely there are more important things for the council to focus on.
WG Outer	No	Would appreciate a co-ordinated and concerted effort To propose new Outer and Inner CPZs and not be able to readjust e.g. hours of operation and take into account the Low Traffic Neighbourhood (LTN) plans, appears to contradict and work against the principles of the Transport Strategy and the interests of the local communities. Inconsistent operational times e.g. Wood Green Outer M-Sat 8-6.30pm and Highgate M-F 12-1pm are inherently unfair. If the proposed extra CPZs reduces cross zone parking then why would reducing existing times be an issue? There is an imposition and also a costs implication on fair minded residents whether drivers or not and for their visitors. Shopping habits have changed. What is preventing the proliferation of medium to large sized delivery vehicles pounding the residential streets?
WG Outer	No	Would be great if households could have an allocated bay! Sorry if I sounds like I'm moaning, but we are very heavily taxed in London and it does seem that your proposals are designed to benefit the council more than residents.
WG Outer	No	would it be feasible to introduce a system similar to Islington at present where residents from any borough are allowed to park in any other Islington borough for up to 4 hrs per day between 11am-3pm?
WG Outer	No	Wouldn't like long hours. Please do the best for the public and be fair.
WG Outer	No	You are waging war on the car! After much increased parking permit fees for diesels in particular, you now want to reduce the places where we can park. So, paying more to get less! It is not necessary and not fair.
WG Outer	No	You need to focus on important issues like the need to tackle ASB - esp around Turnpike Lane Stn where there are frequent stabbings. Changing the parking is irrelevant to this. On street policing is needed - it's that simple. Despite the high crime rates, I hardly ever see any police on the streets around Turnpike Lane or Wood Green
WG Outer	No	You need to think about supporting residents without driveways who need EVCPs, rather than keep telling us we can't run cables on the pavement. Please start telling us what we can do to install EVCPS. Think Positive!

WG Outer	No	You now want to charge us to shop in Wood Green. Families and the elderly need support - esp in these covid times. Visiting is difficult if we always have to pay. Don't you want to do something for mental health? Apparently not, as you are trying to make it as difficult as possible for us. We are one of the most expensive boroughs for council tax, please show some mercy and stop trying to squeeze more out of us. The green issue is simply a red herring.
WG Outer	No	You should make all five into 1 CPZ with operating days and hours 8am to 10pm seven days a week
WG Outer	No	You've already decided to do this and this consultation is a 'fig leaf' exercise. This is a common Haringey ploy. Anything which raises extra revenue is considered fair game and dressed up as an eco-friendly measure. I would much prefer you to be honest about funding cuts from central Government which mean more local taxes for long-suffering residents. I suggest the following actions: A limit on no of cars registered at one address; A proper register of which houses are multiple occupancy; Limit on no of permits issued to Homes for Haringey vehicles which currently park anywhere; Limit on parkign of vehicles on the road by local garages.
WG Outer	No	Your CEOs should be better trained and polite and should not be paid bonuses for issuing tickets. I would like to see cheaper parking permits and for you to understand that this is not a business, but a public service, so you should stop trying to make our lives more difficult.
WG Outer	No	Your proposals would make it much more difficult for me as a single mum to deal with school drop off / pick-up and do visit my elderly father in Burghley Rd. It would also add 1 hour to my working day as I would no longer be able to park near Turnpike Lane station which is currently accessible to residents. It would help to have a permit option that enables travel / park within the zone - even if there is a slight increase in cost
WG Outer	No	Your proposals would not reduce the commuter problem as people would still drive in to use the Tube. Your changes would make life impossible for me. I've lived here for 50 years and have never been more worried. I have cooked food delivered daily and have carer and family visits daily and evenings. I rely on family companionship and your proposals would create isolation and imprisonment. .....I have no choice but to write and complain to ward councillors and my MP, as I'm very worried and concerned. It's impossible to keep supplying VPs and this would be even worse with the changes
WG Outer	No	Your proposed changes cannot be justified because of the extra charges involved. % new zones would add to complexity and increase costs for visitors especially if it was also extended to Sunday / evenings. It would affect elders and poorer people disproportionately

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Report for: Cabinet – 8 March 2022

Title: Report from the Local Government and Social Care Ombudsman (19 020 651)

Report authorised by: Fiona Alderman, Head of Legal and Governance and Monitoring Officer

Lead Officer: Fiona Alderman, Head of Legal and Governance and Monitoring Officer

Ward(s) affected: N/A

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

1. Describe the issue under consideration

1.1 Mr X complained to the Local Government and Social Care Ombudsman (LGSCO) in 2021 about the Councils failure to meet his disabled son's needs by taking too long to carry out adaptations to his property in N15 funded by the Disabled Facilities Grant (DFG). Mr X's complaint related to the length of the process and the impact of the delays on his son's wellbeing between the period of December 2016 to March 2019.

1.2 On 9 December 2021, the Ombudsman published a report finding fault with the council and making recommendations as to the steps to be taken by the council as a result.

1.3 Cabinet are requested to note the steps taken so far and decide what further steps should be taken

2. Cabinet Member Introduction

2.1 The Ombudsman has made a report finding fault with the Council in relation to a complaint made by Mr & Mrs X and has asked the Council to take certain steps to remedy that fault.

2.2 This report summarises the Ombudsman's report and the steps that have been taken to date. It also proposes further steps to be taken by the Council in response to the report.

2.3 Cabinet must consider the Ombudsman's report (shown at Appendix 1) and the steps it is proposed to take in response.

3. Recommendations

Cabinet is asked:

3.1 To accept the findings and recommendations of the Local Government and Social Care Ombudsman (LGSCO) in the report shown at Appendix 1.

3.2 To endorse the actions taken by the Council as set out in paragraphs 6.11 to 6.14 of the report.

3.3 To adopt the report as the council's formal response under s.31 Local Government Act 1974, to be communicated to the Ombudsman.

3.4 To adopt the report as the Cabinet's formal response as required by s5A Local Government and Housing Act, 1989, for distribution to all members and the Monitoring Officer.

4. Reasons for Decision

4.1 The LGSCO report published on 9 December 2021 issued a finding of: Upheld; maladministration and injustice. That Mr X suffered injustice because of fault, under Section 31(2) of the Local Government Act 1974.

4.2 The LSGCO identified several areas of fault:

- Periods of delay between Oct 2016 and Feb 2019. (Not withstanding that the family delayed responding to the Council by 1 year when the request was first made in 2015)
- Failure to evidence that meaningful support was offered to the family or that they were meticulously kept informed of the status of their application
- Further delay between Feb 2019 and Sept 2019
- Failure to install two changing benches in Feb 2019 and poor record keeping about this
- Failure to evidence proper consideration was given to the family's request for alternative adaptations.

4.3 The LGSCO has recommended the following action be taken:

- The Council must consider the report and confirm within three months the action it has taken or proposes to take. The Council should consider the report at its full Council, Cabinet or other appropriately delegated committee of elected members and we will require evidence of this. (Local Government Act 1974, section 31(2), as amended) 87.

4.4 In addition to this requirement, the Council should take the following action:

- Apologise in writing to Mr and Mrs X.
- Pay Mr and Mrs X £2,000. This is a symbolic payment to acknowledge the significant delay in this case. Mr and Mrs X intend to use it to fund a family holiday for the benefit of Child Y. In deciding on this amount, we considered our Guidance on Remedies.
- Contact Mr and Mrs X to agree what works remain outstanding. The Council should confirm what has been agreed in writing. These agreed works should be completed within four weeks from the date COVID-19 restrictions have

been lifted to the extent that Mr X is comfortable with contractors coming into the family home. The Council has confirmed discussions are taking place with Mr and Mrs X to agree a suitable way forward; and

- Reflect on the issues raised in this decision statement. The appropriate Service Director should carry out a review and identify any areas of service improvement. The Council should prepare a short report setting out what it intends to do to ensure similar problems do not reoccur, particularly around delay and strip washing.

4.5 It should be noted that the Council has already reported back to the Ombudsman in response to a draft version of this report.

5. Alternative Options Considered

5.1 The LGSCO cannot mandate the Council to follow its recommendations, but local authorities do follow them.

5.2 If the LGSCO is not satisfied with the Council's response, they will make a further report explaining this and making recommendations. The LGSCO can also require the Council to make a public statement about the matter.

5.3 Therefore, Cabinet could choose on rational grounds to reject any of the recommendations made by the Ombudsman.

5.4 However, this alternative is not recommended because the LGSCO recommendations represent an appropriate remedy for the reasons set out above.

6. Background Information

6.1 The full background is set out in the Ombudsman's report, as shown at Appendix 1.

6.2 Child Y has severe disabilities, including quadriplegia, epilepsy, and cerebral palsy. He requires support in all areas of daily living. He resides at home with Mr and Mrs X and his older sister.

6.3 A timeline of events relating to Child Y, Mr and Mrs X is set out at Appendix 1.

6.4 Disabled Facilities Grants (DFGs) are provided under the terms of the Housing Grants, Construction and Regeneration Act 1996 (the Act). The Act says councils should approve or refuse a grant application as soon as reasonably practicable and no later than six months after the date of the application. The works should be completed within 12 months of the approval.

6.5 The LGO took into consideration the fact that Mr and Mrs X did not complete the necessary documentation between November 2015 and October 2016. No progress could be made until this had been done and did not hold the Council

responsible for this period of delay. Formal grant approval was given in March 2018, 16 months after the application and over two years after Mr and Mrs X first requested assistance.

6.6 Consideration was given to the fact that Mr and Mrs X accepted responsibility for 11 months of the delay, between April 2018 until February 2019.

6.7 The Council was **not** found to be at fault in respect of the failure to install the ceiling tracking in February 2019 as this was a professional assessment.

6.8 The Guidance advises Councils to be proactive in finding interim solutions where it is known that major works will take time to complete. Records provided by the Council do not show that this took place, and Mr and Mrs X were left not knowing what was going on for periods of time, particularly between when they completed the forms in November 2016 and the date of the grant approval in March 2018.

6.9 The Ombudsman's findings are accepted. The service is sorry for the mistakes made and is determined to learn from them. A written apology has been given to the family, and the Council is seeking to remedy the mistake for the family by following the Ombudsman's recommendations. A service improvement plan is also being developed with stakeholders which includes the learning from this case.

6.10 The Ombudsman's recommendations are appropriate because:

- The Council must ensure Mr and Mrs X's s case is now being dealt with appropriately to comply with its obligations and responsibilities in respect of DFG application processes.
- It is right to offer compensation to Mr and Mrs X given the Ombudsman's findings of injustice.
- The Council must identify both the errors that led to these delays and ensure it is now complying with its duties towards other service users. This will help prevent any similar injustices occurring in the future.

<u>Actions taken</u>

6.11 Officers have sent a written apology to Mr and Mrs X.

6.12 A payment of £2000 has been forwarded to the account to Mr and Mrs X.

6.13 A review of Mr and Mrs X case has been undertaken and has resulted in improvement plan developed to address the areas identified that contributed to the finding. The Service Improvement Plan is presented at appendix 2 and identified communication is the key issue to improve residents experience when receiving a major adaptation. We have commenced co-production conversations with service users, set outcomes and progress indicators and committed to monitoring and providing regular updates to Members.

6.14 The Director of Adults and Health has consulted with the relevant corporate officers, including the Chief Executive Officer and they agree with the recommendations within this report.

7. Contribution to Strategic Outcomes

7.1 There is a legal obligation to consider such reports from the LGSCO. Therefore, this report is necessary.

7.2 It is part of the good administration of the Council to learn from any mistakes.

8. Statutory Officer Comments

8.1 Finance

8.1.1 The Chief Finance Officer notes the contents of this report, which includes the recommendations from the LGSCO.

8.1.2 The compensatory payment to Mr and Mrs X of £2000 has been paid by Adult Social Care and is funded from their budget. Any agreed works that remain outstanding to the family home will be funded via the DFG.

8.2 Legal

8.2.1 Under the Local Government Act 1974 (the Act), the LGSCO has the power to investigate the complaint and to issue a report where there has been maladministration causing injustice; a failure to provide a service that it was the Council's function to provide; and a total failure to provide such service. The LGSCO has the power to make recommendations to the Council on how to improve its services and to put things right for the complainant. However, these recommendations are not mandatory and the Council does not have to accept or follow them.

8.2.2 Within 2 weeks of receiving the LGSCO's report, the Council is required to give public notice by advertisements in newspapers stating that copies of the report will be available to inspect by the public at the Council's offices for a period of three weeks (s.30 of the Government Act 1974).

8.2.3 The Act provides that the report shall be laid before the "authority" for consideration. In the case of a local authority operating executive arrangements (as in Haringey), "the authority" means the executive, i.e. Cabinet (s.25 (4) and (4ZA) Local Government Act 1974).

8.2.4 The Council's Monitoring Officer is obliged to prepare a report for Cabinet following the LGSCO findings and to consult with the Head of Paid Service and Chief Finance Officer for this purpose. This report must be sent to each member of the Council and Cabinet must meet within 21 days thereafter. The implementation of the proposal or decision must be suspended until after the report has been considered by Cabinet (s.5A Local Government and Housing Act 1989). Cabinet is required to consider this Monitoring Officer report on the findings of and response to the LGSCO's report.

8.2.5 Where Cabinet considers a LGSCO's report and it is considered that a payment should be made or other benefit given to a person who has suffered injustice, such expenditure may be incurred as appears appropriate (s.31(3) Local Government Act 1974).

8.2.6 Within 3 months of receiving the LGSCO's report or such longer period as may be agreed in writing with the LGSCO, the Council must notify the LGSCO of the action which the Council have taken or propose to take (s.31(2) Local Government Act 1974). If the LGSCO is not satisfied with the action which the Council has taken or propose to take, the LGSCO shall make a further report. The LGSCO can also require the Council to make a public statement in any two editions of a newspaper circulating the area within a fortnight (s.31(2A) and (2D) Local Government Act 1974).

8.2.7 An Ombudsman's report should not normally name or identify any person (s.30 Local Government Act 1974). Therefore, the complainant is referred to as 'Mr X' and officers have not been identified.

8.3 Procurement

8.3.1 Procurement notes the contents of this report and will support commissioning as appropriate.

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 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 applies to the first part of the duty.

8.4.3 The report outlines the plan to adopt the Ombudsman's recommendations for Mr & Mrs X. This will impact their son, Child Y, who has severe disabilities. The objective of the proposal is to fulfil the recommendations made by the LGSCO that suggest the Council should provide his parents with a compensatory payment and agree and undertake any further adjustments needed in a timely way. This will lead to an improved quality of life for Child Y, and his family, by

maximising the accessibility of the family home, and enabling them to take a holiday funded by the payment to be made by the Council. The will help to ensure that the Council meets any needs Child Y has as a result of his disabilities and is therefore a measure that will advance equality of opportunity for Child Y.

9. Use of Appendices

Appendix 1 – Report by the Local Government and Social Care Ombudsman, Investigation into a complaint against London Borough of Haringey (Reference Number: 19020651) 29 November 2021.

Appendix 2 – Service Improvement Plan

10. Local Government (Access to Information) Act 1985

N/A

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Local Government & Social Care OMBUDSMAN

Report by the Local Government and Social Care Ombudsman

Investigation into a complaint against London Borough of Haringey (Reference number: 19020651)

29 November 2021

The Ombudsman's role

For more than 40 years the Ombudsman has independently and impartially investigated complaints. We effectively resolve disputes about councils and other bodies in our jurisdiction by recommending redress which is proportionate, appropriate and reasonable based on all the facts of the complaint. Our service is free of charge.

Each case which comes to the Ombudsman is different and we take the individual needs and circumstances of the person complaining to us into account when we make recommendations to remedy injustice caused by fault.

We have no legal power to force councils to follow our recommendations, but they almost always do. Some of the things we might ask a council to do are:

- apologise
- pay a financial remedy
- improve its procedures so similar problems don't happen again.

Section 30 of the 1974 Local Government Act says that a report should not normally name or identify any person. The people involved in this complaint are referred to by a letter or job role.

Key to names used

Mr X	The complainant
Mrs X	His wife
Child Y	Their son

Report summary

Education & Children's Services

Mr X complained about the Council's failure to meet his disabled son's needs by taking too long to carry out adaptations to his property. He also complained about being pressurised into accepting unsuitable adaptations.

Finding

Fault found causing injustice and recommendations made.

Recommendations

1. The Council must consider the report and confirm within three months the action it has taken or proposes to take. The Council should consider the report at its full Council, Cabinet or other appropriately delegated committee of elected members and we will require evidence of this. ***(Local Government Act 1974, section 31(2), as amended)***
2. In addition to this requirement, the Council should take the following action:
   - apologise in writing to Mr and Mrs X;
   - pay Mr and Mrs X £2,000. This is a symbolic payment to acknowledge the significant delay in this case. Mr and Mrs X intend to use it to fund a family holiday for the benefit of Child Y. In deciding on this amount, we considered our Guidance on Remedies;
   - contact Mr and Mrs X to agree what works remain outstanding. The Council should confirm what has been agreed in writing. These agreed works should be completed within four weeks from the date COVID-19 restrictions have been lifted to the extent that Mr X is comfortable with contractors coming into the family home. The Council has confirmed discussions are taking place with Mr and Mrs X to agree a suitable way forward; and
   - reflect on the issues raised in this report. The appropriate Service Director should carry out a review and identify any areas of service improvement. The Council should prepare a short report setting out what it intends to do to ensure similar problems do not reoccur, particularly around delay and strip washing. The Council has already reported back to us in response to a draft version of this report.

The complaint

3. Mr X complained about the Council's failure to provide adaptations to his property for his disabled child, funded by a Disabled Facilities Grant (DFG).
4. Mr X also complained about being pressurised into accepting unsuitable adaptations.
5. He says the significant delay has left his family struggling to manage, particularly as his son gets older.

Legal and administrative background

6. We investigate complaints about 'maladministration' and 'service failure'. In this report, we have used the word fault to refer to these. We must also consider whether any fault has had an adverse impact on the person making the complaint. We refer to this as 'injustice'. If there has been fault which has caused an injustice, we may suggest a remedy. ***(Local Government Act 1974, sections 26(1) and 26A(1), as amended)***
7. We cannot investigate late complaints unless we decide there are good reasons. Late complaints are when someone takes more than 12 months to complain to us about something a council has done. ***(Local Government Act 1974, sections 26B and 34D, as amended)***
8. We investigate complaints about councils and certain other bodies. Where an individual, organisation or private company is providing services on behalf of a council, we can investigate complaints about the actions of these providers. ***(Local Government Act 1974, section 25(7), as amended)***
9. When considering complaints, if there is a conflict of evidence, we make findings based on the balance of probabilities. This means that we will weigh up the available relevant evidence and base our findings on what we think was more likely to have happened.
10. Under the information sharing agreement between the Local Government and Social Care Ombudsman and the Office for Standards in Education, Children's Services and Skills (Ofsted), we will share this decision with Ofsted.

What we have investigated

11. The restriction outlined in paragraph five applies to this complaint because Mr X's complaint includes events that took place over a year ago. We can disapply this rule if there are good reasons. We have decided to exercise discretion to investigate earlier events for the following reasons.

    - Mr X approached the Council for support with adaptations in 2015. These adaptations remain incomplete. In the context of a severely disabled, growing child, this time frame is significantly longer than the law expects. We consider it is in the wider public interest for this delay to be investigated.
    - The earlier delay is inextricably linked to more recent events.
    - Had the adaptations been fully completed in February 2019, Mr X says he was prepared to accept the delay leading up to that point and had accepted the reasons given by the Council. But when the adaptations were not completed, Mr X's opinion about the delay changed. We consider this to be an understandable position for him to have taken.

- We are satisfied, from the case records we have been provided with, that we are able to reach a sound, fair and meaningful decision relating to the earlier events.
- Mr X has provided evidence that an earlier occupational therapy assessment was carried out by the NHS in 2013. This was in the context of their previous accommodation and so we do not consider it appropriate to investigate what happened before 2015.

How we considered this complaint

12. We produced this report after examining relevant documents provided by the Council and speaking to the complainant.
13. The complainant and the Council were given a draft version of this report and we invited their comments. The comments received have been taken into account.

What we found

Disability adaptations

14. Disabled Facilities Grants (DFGs) are provided under the terms of the Housing Grants, Construction and Regeneration Act 1996 (the Act). There is also detailed guidance from 2015 that sets out good practice – Home Adaptations for Disabled People (the Guidance).
15. Additional information about good practice is contained in our Focus Report, "Making a house a home: Local authorities and disabled adaptations" (published March 2016).
16. Councils have a statutory duty to provide grant aid to disabled people for certain adaptations. The council will need to check that the proposed works are:
    - necessary and appropriate to meet the disabled person's needs; and
    - reasonable and practicable depending on the age and condition of the property.
17. The maximum grant that can be paid in England is £30,000.
18. Once the authority has enough information to decide what adaptations are necessary and appropriate, it then has to consider whether they are feasible and practicable.
19. If a more affordable scheme provides the 'necessary and appropriate' adaptations and meets the needs of the rest of the household, we are unlikely to criticise a council's decision to progress with the cheaper alternative. This is provided that the council has made the necessary considerations.
20. Councils will often consult an occupational therapist (OT) from the social services department to carry out the assessments.
21. The Act says councils should approve or refuse a grant application as soon as reasonably practicable and no later than six months after the date of the application. The works should be completed within 12 months of the approval.
22. The Guidance recommends a timescale of 55 days in urgent cases and 150 days for non-urgent cases. This timescale runs from the first contact to the completion of the works.

23. The Guidance says that where the process to secure a long term solution will be lengthy, then it is appropriate for interim help to be provided through the provision of equipment or temporary works. It says it is not acceptable that the disabled person should be left without interim help.

24. The Guidance says any assessment or review of need should include the views of the child and their parents. Reviews should take account of the high level of stress experienced by parents with disabled children and take account of the needs of any non-disabled children in the family.

25. The Guidance states that "the provision of facilities for 'strip washing' is not an acceptable alternative to an appropriate bathroom".

The Council's policy (2017)

26. This stated the Council's current performance for processing major adaptations exceeded 52 weeks. The aim was to reduce this down to an average of 12 weeks by 2019/20. All applicants must be kept informed of the progress of their application by letters on receipt of the initial application, following initial assessment and final approval.

27. The Council's OTs work in collaboration with the surveyors to decide and agree upon a scheme. The OT must determine what is necessary and appropriate for the disabled person to meet their eligible assessed needs and the surveyor must consider what is reasonable and practical given the structural, planning, and other restraints. The most modest solution is recommended, and the OT and surveyor must differentiate between the "needs" and "wants" of the service user.

What happened

Background information

28. Child Y has severe disabilities, including quadriplegia, epilepsy and cerebral palsy. He requires support in all areas of daily living. He lives at home with Mr and Mrs X and his older sister.

Key events

2015 – First assessment

29. In 2015, Mr and Mrs X asked the Council to help source suitable, adapted housing. Their current home was unsuitable for Child Y and could not be adapted to meet his needs as he grew up. They needed help with moving Child Y around the house due to his inability to walk and because he was growing up and getting heavier to lift.

30. An OT carried out an assessment and determined Child Y had needs in the following areas.

- Bath transfers.
- Bed transfers.
- Transfers off the floor in the lounge.
- Stair mobility.

31. The OT recorded that Mr and Mrs X had to lift and carry Child Y up and down the stairs and lift him in and out of the bath. She acknowledged "this is becoming a concern as [Child Y] is getting heavier. [Mrs X] is reporting that she is now developing health issues of her own and is at risk of injury due to manual handling

tasks". The OT also recorded Mrs X informing her that Child Y does not tolerate being showered due to the sensation.

32. Following this assessment, Mr X and his family were allocated and moved to a specialist housing association property. The Council's OT carried out an assessment of what adaptations were needed.

33. In October 2015, Mr and Mrs X were given the DFG application forms to complete. They did not return these to the Council until October 2016.

2016 – OT recommendations

34. Upon receipt of the completed forms, in October 2016, the OT made a recommendation for the following adaptations.

- A through floor lift.
- A ceiling track hoist system in the bathroom, bedroom, downstairs toilet and lounge.
- Changing benches in the bathroom and downstairs toilet.

35. Shortly afterwards a surveyor was appointed by the Council to manage the adaptations and in December 2016 a schedule of works was drawn up. There was a significant backlog of cases and so no progress was made for a year.

2017 – case transferred to contractor

36. In October 2017, to help address this problem, the case was transferred to a commercial contractor (the Contractor) to progress. There was further delay because of the large number of cases allocated to the Contractor by the Council.

2018 – DFG approval

37. In March 2018, the DFG was approved. Mr and Mrs X were notified of this but in April 2018 asked the Council to postpone the work until further notice for personal reasons.

2019 – adaptations partially completed

38. In February 2019, the adaptations were scheduled to be carried out. Because of the scale of the work, Mr and Mrs X knew that the disruption would cause Child Y considerable distress. For this reason, they arranged a caravan holiday for the week the building work was scheduled to be done.

39. Halfway through their holiday, they were advised by the Contractor that it could only complete the installation of the through floor lift. It had not been possible to install the ceiling tracking because it was "not feasible". The Council's case note states the reason as being, "because of void to ceiling and concrete slab not thick enough". It also explained the problem would not have been picked up by the survey as the thickness of the ceiling was variable. The Contractor told Mr and Mrs X it did not know about changing the benches.

40. Mr and Mrs X say they were extremely disappointed and frustrated by this, particularly after they had waited so long. They had to take leave from work and felt the Council had not considered their son's needs and the impact on the family as a whole. They say the survey was clearly inadequate, otherwise the feasibility issue would have been identified sooner.

41. In March 2019, the Contractor emailed Mr X with possible dates for the installation of the ceiling tracking over the next four weeks. The Contractor also provided details of the proposed changing benches. There are no records about

what happened about this until six months later but the Council says the Contractor was waiting to hear back from Mr X.

42. In September 2019, the Council's adaptation surveyor (Officer M) called Mr X to chase up a date for installation of the ceiling track. He was unable to speak to Mr X about this until October 2019. Officer M explained the ceiling tracks had been custom built and needed installing as soon as possible because they could not be stored indefinitely. Mr X explained he needed to discuss new requirements.

43. Later that month Officer M went to meet Mr and Mrs X to discuss this. Mr and Mrs X say that because so much time had passed since the original assessment (it was done before they had lived in the property and properly understood what they needed and what would work best for them), they needed to revise the plan.

44. They explained Child Y enjoyed having a bath, but his size and movements made a deep bath an essential requirement. For this reason, they requested a downstairs deep bath and so no longer needed some of the ceiling track to the upstairs of the property. Officer M explained this would need to be discussed and agreed by an OT.

45. In November 2019, the OT considered this request and decided a shower trolley would do the same task, so a bath downstairs was not necessary. She also considered a review was needed because Mr and Mrs X did not want to pursue all the previous recommendations.

December 2019 – the complaint

46. In December 2019, Mr X made a formal complaint to the Council about the following matters.

- The recommendation for a shower to be installed. This was in direct conflict with a previous OT assessment that Child Y was unable to tolerate a shower. He says this was decided without reviewing Child Y's needs, discussing it with his parents or visiting the property.
- Being "bullied" by Officer M into accepting this unsuitable proposal as he was not given the opportunity to challenge it, particularly as it contradicted previous OT assessments. Mr X says, "it was presented as a done deal in an attempt to force me to follow a course of action that was detrimental to my son".
- Not being given the name of the OT who made this decision.

47. The Council response to the complaint was as follows.

- The OT's recommendation from November 2015 included a changing bench for the downstairs toilet. Following Officer M's report from his home visit in October 2019, the OT advised that the rise and fall mobile shower changing bench would do the same task, with the installation of a shower unit and would assist with "washing Child Y down as required".
- The complaint response clarified this was not a recommendation. Rather it was an alternative method to the request for a deep bath. The Council acknowledged Child Y could not tolerate showering, but the showering unit could be used to support with strip washing and accessing water easily while Child Y was on the changing bench. The Council apologised for this not being properly communicated before.
- The Council provided Mr X with the OT's name.

- While the Council denied Officer M had tried to bully Mr X into accepting the shower, it agreed that Officer M should have made it clear that further discussions may be needed to consider what the OT had said. The Council apologised for this.

48. In January 2020, the OT tried to arrange a review with Mr and Mrs X. She called Mrs X to arrange this, but Mrs X refused to speak to her on her mobile because it would mean the call was not recorded. The OT tried to call back on several occasions but was unsuccessful in talking to Mrs X.

49. As she had been unable to contact Mrs X in February 2020, in March 2020 the OT's manager wrote to Mr and Mrs X, asking them to contact them to arrange a suitable time for the OT to visit to discuss her recommendations. They did not reply.

Mrs and Mrs X have explained to us why they did not want another meeting.

- They say by this time they had become weary of the process because it had gone on so long and had caused such disruption to their lives. They were fed up with multiple appointments, dealing with the same issues, particularly as the country had been put into lockdown.
- They say they also felt "bullied" by the OT into adaptations, such as the shower and what they considered to be an unsafe changing bench, that they say were clearly unsuitable for Child Y. They had already explained to the OT that Child Y could not have a shower because the sensation of the water on his skin was highly distressing for him. They say they had also provided details of a suitable changing bench, but this had been disregarded. They had been clear that due to Child Y's involuntary body movements, it was not safe to use a changing bench without sides like the one recommended by the OT, and the upstairs bath was no longer suitable for him.

50. In March 2020, Mrs X emailed the Council to say they wanted the remaining adaptations completed. They also brought their complaint to us.

51. In June 2020, the Council wrote to Mrs X advising that a visit was necessary to establish what was outstanding.

Current position

52. Since March 2020, the family have been shielding from COVID-19 because Child Y is considered extremely clinically vulnerable. They did not want visitors to the property and were prepared to wait until the risk from COVID-19 is over for the work to be carried out. They say they would like to be in a position for the work to be agreed and so it can be completed as soon as this is possible.

53. They have told us they just want the ceiling tracks installed once lockdown restrictions have been lifted. They have said they no longer require any adaptations to the downstairs toilet because they need this space to store the large, specialist equipment needed by Child Y at home.

The Council's response to our enquiries

54. Following the initial survey in October 2016, the Council explained it took a year to pass the case to the Contractor. As there was only one contractor available, there was a backlog of cases.

55. The Council say Mr and Mrs X have also contributed to the delay, because they did not return the DFG applications forms for about a year and requested

alternative adaptations to what was originally agreed. There had also been problems contacting them.

56. The Council has explained the proposal to install strip washing facilities downstairs was only a “temporary alternative solution” while the hoists were being installed upstairs. In response, Mr X says he has never been told this before.

Analysis

Events before February 2019

57. The law says a decision on whether to award a DFG should be made within six months from the date of application. And adaptations should be completed within 12 months from grant approval. In this case, the DFG application was made in November 2016. This was already 12 months after the OT had made her recommendations

58. We must take into consideration the fact that Mr and Mrs X did not complete the necessary documentation between November 2015 and October 2016. No progress could be made until this had been done. We can see the Council chased this up in the interim period. For this reason, we do not hold the Council responsible for this period of delay

59. Formal grant approval was given in March 2018, 16 months after the application and over two years after Mr and Mrs X first requested assistance. The law says approval should be given within six months. This delay was fault.

60. Once funding had been approved, Mr and Mrs X have accepted that they were responsible for 11 months of delay until February 2019. This was due to their personal circumstances. We do not find the Council was at fault for this period of time. However, the length of time between the DFG application having been made and its installation meant the through floor lift took over a year longer than it should have done to install. This lengthy delay is fault, regardless of the reasons given by the Council about the problems with contractors.

61. Disappointingly, the adaptations were only partially completed. Neither the tracking nor the changing benches were installed. The Council has said the changing benches were to be installed at a later date but there are no records to support this explanation and it is contrary to Mr X’s recollection. The changing benches were included in the original specification so we would have expected to see some explanation about why they were not installed in February 2019. Mr X has said the Contractor did not know about them. On balance we are persuaded to accept Mr X’s account of what happened. If the benches were to be installed later, we would have expected to see a record of this being explained to Mr and Mrs X. Both the failure to install the changing benches when expected and the lack of any records about this are areas of fault.

62. The Council has provided evidence from the Contractor that the feasibility problem was not foreseeable and it was not possible to correct this prior to the installation date. This was a professional assessment and so we do not find there was fault in respect of the failure to install the ceiling tracking in February 2019.

63. In the event of such a long delay, particularly where a severely disabled child is involved, we would expect to see at the very least some record of contact with Mr and Mrs X, providing regular updates and advising them of the current position. The Guidance advises councils to be proactive in finding interim solutions where it is known that the major work will take time to complete.

64. From the records we have been provided with, the Council did not do this. So for much of the time Mr and Mrs X were left not knowing what, if anything, was going to happen and when, particularly between when they completed the forms in November 2016 and the date of grant approval in March 2018. We have not seen any evidence that they were offered any interim assistance, other than a mobile hoist in 2016. There is no evidence of interim support being discussed between 2016 and 2019. This is further fault.

65. To their credit, Mr and Mrs X say they would have accepted this delay, had all of the works been carried out in February 2019. They had gone to significant trouble and expense moving out for the week to a caravan park to enable the work to be carried out without causing Child Y distress. They were understandably disappointed because they believed there had been a mistake on the part of either the Contractor or the surveyor. It is not clear from the records we have seen whose responsibility it was. For the purposes of this decision, it does not matter as the Council retains responsibility for overseeing the process.

Events after February 2019

66. The records show that Council officers have made some attempts to engage with Mr and Mrs X since February 2019 to make progress with the adaptations. We acknowledge Mr and Mrs X have been reluctant to engage with the Council when it has attempted to move the case forward and this has inevitably contributed in part to the delay since February 2019. However, we do not criticise them for this. It is understandable why Mr and Mrs X have lost confidence in the Council because of the significant delays and its failure to complete the adaptations when it was meant to do so.

67. This breakdown in trust and communication has contributed to what has happened more recently.

68. Mr and Mrs X say they could not agree to the remaining adaptations going ahead because, by that time, their son's requirements had changed. This highlights the importance of adaptations taking place in a timely fashion. In February 2019, Child Y was four years older than when Mrs X and the OT agreed what was needed. It is understandable that Mr and Mrs X needed to revise their requirements, particularly around moving and handling and bathing. From the limited records the Council has been able to provide, there is no evidence of any meaningful discussions about this taking place before October 2019.

69. The records show the Contractor emailed Mr X in March 2019 with proposed dates for the completion of the outstanding work. The next recorded contact was a call from Officer M to Mr X in September 2019, chasing this up. It should not have taken so long for the Council to do so. This further delay is fault.

The revised recommendations – bathroom/washing facilities

70. The Council and Mr X disagree about what was discussed and agreed about enabling Child Y to access washing and bathing facilities. The Council says the original recommendations (ceiling track and hoist to the upstairs bath) had not changed and the proposal to install a shower and bench downstairs was only a "temporary alternative solution". If this was the case, we would expect to see this reflected in the case notes. It is not.

71. Mr X told Officer M that they no longer required a hoist from the upstairs bedroom to the bathroom. They say they explained to the Council that the upstairs bath was not deep enough for Child Y now he had grown. This is not explicitly recorded by Officer M, instead he recorded, "[Mr X] is asking for a reassessment

of [Child Y's] needs, the family want the hoist in the bedroom to be put on hold…they want a deep bath tub downstairs". It would be reasonable to assume from this that Mr X intended the downstairs bath to be the only place in the house that Child Y would access full washing facilities. He was also clearly asking for a reassessment of Child's Y's needs as he was growing up.

72. Because of this, it is entirely understandable why Mr and Mrs X were so disappointed by the OT's proposal to install a shower downstairs, particularly as strip washing is not promoted by the Guidance and Child Y had been previously assessed as being unable to tolerate showering.

73. The Council's recently stated position that the shower was only an interim measure is strongly disputed by Mr X. He says the Council never said this, and in any event, the significant extent of the adaptations required for the shower would make no sense as a temporary measure.

74. We agree with Mr X. The evidence does not support what the Council has said. There is no record of it being a temporary measure, either in the case records, complaint correspondence or the initial response to our enquiries. This was a significant point and so we would have expected to see a record of this.

75. We would also have expected to see a proper record of the Council's assessment that the upstairs bath was suitable for Child Y, as now claimed by the Council. Its unsuitability, now Child Y was several years older, was the reason why Mr X requested the change to the recommendations. Mr X specifically asked for a reassessment of need in October 2019. This did not happen. Instead, Officer M simply discussed what Mr X had said with the OT and she said the shower "would do the same task".

76. Mr and Mrs X felt they were being bullied into accepting a cheaper alternative to what their child needed. While the Council can consider more cost-effective methods to achieving an outcome, it should not have disregarded the previous assessment about showering and the preferences expressed by Child Y's parents. We would also have expected to see some consideration being given to the suitability of the upstairs bath, given that Mr X had said it was no longer so. The Council should have been able to demonstrate it had taken these factors into consideration, when making its decision. It has not been able to do so.

77. In the absence of any meaningful case notes, we have carefully considered the Council's explanation provided to Mr and Mrs X in its complaint response and later correspondence. We found this to be contradictory about this issue. In its January 2020 complaint letter, the Council explained the shower/bench, "was not a recommendation, but was an alternative method to your request". Yet in the March 2020 letter, the OT's manager asked for a meeting to discuss "the recommendations that had been made". We have also read Officer M's case note of his conversation with the OT. He recorded, "her advice as being the shower". There is no record of how this was communicated to Mr and Mrs X. However, in the absence of any evidence to the contrary, and on the balance of probabilities, we do not have any reason to doubt their recollections that they were told this was the OT's recommendation.

78. The Council seems to have accepted this in part by acknowledging in its complaint response that it was a suggestion that, "may have needed further discussion". The Council also explained, "there will always be the opportunity to discuss recommendations or alternative methods even if not explicitly said".

79. This is where the problem lay for Mr and Mrs X. As it was not “explicitly said” that they had the opportunity to object to a shower, they were left thinking it was that or nothing. The Guidance is clear that applicants should be involved in the decision-making process. We are not satisfied they were at this point and for this reason we find the Council to be at fault.

80. The Council had already assessed and accepted Child Y’s inability to tolerate a shower. We, therefore, find the recommendation that a shower would “do the same task” failed to take account of his individual needs, regardless of whether or not an upstairs bath was available. This was further fault.

81. The records show the Council had made many attempts to contact Mr and Mrs X by both phone and letter, particularly since October 2019. While we understand Mr and Mrs X’s frustration, the reality is the adaptions could not proceed without their input because circumstances have changed since the original recommendations. For this reason, we do not hold the Council responsible for delay since October 2019.

Conclusions

82. We have identified several areas of fault.

- Periods of delay between October 2016 (when Mr and Mrs X completed the DFG application forms) and February 2019, when the adaptations were partially completed.
- Failure to evidence Mr and Mrs X were offered any meaningful interim support pending completion of the adaptations or keep them properly informed of the status of their application.
- Further delay between February 2019 and September 2019, when the Council/Contractor failed to make any progress with the outstanding adaptations.
- Failure to install two changing benches in February 2019 and poor record keeping about this.
- Failure to evidence proper consideration was given to Mr and Mrs X’s request for alternative adaptations.

83. Having identified fault, we must consider if there has been injustice in this case. On the evidence we have seen, we are satisfied the whole family have suffered significant frustration, distress, inconvenience and uncertainty because of the way the Council has dealt with this matter over a prolonged period of time.

84. This case clearly demonstrates the importance of implementing OT recommendations in a timely fashion, particularly where children are involved. Failure to do so can result in the OT assessment being no longer valid or useful, as was the case here.

85. Our investigation into this complaint has been impacted by an inadequate response to our initial enquiries. The Council’s first response to our draft report introduced a significant amount of new evidence, some of which contradicted the position previously set out.

Recommendations

86. The Council must consider the report and confirm within three months the action it has taken or proposes to take. The Council should consider the report at its full

Council, Cabinet or other appropriately delegated committee of elected members and we will require evidence of this. ***(Local Government Act 1974, section 31(2), as amended)***

87. In addition to this requirement, the Council should take the following action:

- apologise in writing to Mr and Mrs X;
- pay Mr and Mrs X £2,000. This is a symbolic payment to acknowledge the significant delay in this case. Mr and Mrs X intend to use it to fund a family holiday for the benefit of Child Y. In deciding on this amount, we considered our Guidance on Remedies;
- contact Mr and Mrs X to agree what works remain outstanding. The Council should confirm what has been agreed in writing. These agreed works should be completed within four weeks from the date COVID-19 restrictions have been lifted to the extent that Mr X is comfortable with contractors coming into the family home. The Council has confirmed discussions are taking place with Mr and Mrs X to agree a suitable way forward; and
- reflect on the issues raised in this decision statement. The appropriate Service Director should carry out a review and identify any areas of service improvement. The Council should prepare a short report setting out what it intends to do to ensure similar problems do not reoccur, particularly around delay and strip washing. The Council has already reported back to us in response to a draft version of this report.

Decision

88. We have found the Council to be at fault in the way it handled Mr X's request for disability adaptations. We have recommended a remedy for the injustice caused by this fault.

APPENDIX 2

Summary of Improvements: Major Adaptations 2017 to 2022

2017:

New Disabled Facilities Grant (DFG) Policy Implemented – the absence of a written policy on the implementation of DFG's was recognised as a weakness and meant we were unable to make use of The Regulatory Reform Order (RRO) 2002, which provided Local Authorities with greater flexibility in the delivery of the DFG. In 2008 the government made a number of changes to the way DFG was administered and the ways it could be used, including the relaxation and removal of the tight ring-fence allowing DFG monies to be used more flexibly and as part of wider strategic projects and reduce the bureaucracy in the grants administration.
The Regulatory Reform Act 2012(RRO) gave Local Authorities greater flexibility to use the grant and removed ring fencing restrictions. This allowed the council to develop a DFG policy which improved access for residents and enabled us to work in a more flexible way.
We are one of only a few councils making use of this reform and have provided valuable insight to DFG Foundations and Central Government for them to consider in the recent DFG review.
The changes we were able to make following the implementation of the policy were:

- Removed the financial means testing for all applicants
- Removed the mandatory grant ceiling, which allowed us to provide adaptations that met the assessed level of need without grant restriction, therefore removing the need for people to pay the difference
- Used the grant funding to facilitate and meet *Better Care Fund* outcomes around prevention, hospital discharge and equipment provision
- Used the grant to make properties safe and appropriate for residents with complex behavioural need
- Utilised the money to pay for essential services such as OT assessment

Contractor framework implementation –we introduced a Contractors Framework with Procurement and this reduced the completion time for adaptations from 24 months to 15 months by September 2020 through a more efficient procurement processes.

2018:

Significant waiting list for OT assessments – this issue required additional resources to clear the backlog and we procured an external OT agency to undertake assessments on our behalf. At start of 2018 over 700 people were waiting for assessment and this has reduced to 44 currently. There are no outstanding paediatric assessments and those cases waiting assessment are rated low risk.

OT assessment to commencement of works – a review of this process was undertaken and we identified that this was a point in the process that was crucial in terms of ensuring that the needs identified through the OT assessment were

understood by the resident before works began and a surveyor was commissioned to make an initial assessment of works.

2019:

Mosaic workflow steps –a review of how the end to end process was undertaken and several areas were identified where new workflow steps would improve the process and enable improved recording, tracking and monitoring. Work in this areas is still ongoing and is included within current and planned service improvement work. Progress int his area has been impacted by Covid 19 pandemic and reduced capacity within Mosaic Support Team to implement the required changes within the system.

New process, OT assessment to commencement of work – following the review of this process in 2018, a new process was implemented to improve handover from initial assessment to surveyor. This included standardised OT specifications, defining roles and responsibilities of the OT and surveyor, removing unnecessary work steps in Mosaic to improve flow

Performance report - a new performance report was introduced in autumn 2019 and shared with the relevant teams. This is discussed monthly within the service performance call over and reported into Performance Management Team by exception.

2020:

Dynamic purchasing system (DPS) –the end of the Contractors Framework meant the process had to be reviewed. In consultation with Procurement we moved to DPS to improve contractor procurement process, increase capacity, streamline approval processed and invoice payment

COVID-19 and Lockdown – the implementation of social distancing requirements from March, meant that no adaptations were undertaken between March and August and this had a significant impact, compounding existing delays and creating a backlog of cases. Services resumed, on a limited basis, with use of PPE, where clients were willing for this to happen. However, many clients have indicated that they wish to postpone work.

Resumption of service improvement work – in autumn 2020 service improvement planning resumed and a schedule was put together and agreed

2021:

Review of all outstanding cases – the service undertook a review of all the cases open for significant period and agreed focused action and identified cases where there has been significant delays or where common themes from complaints have been identified

Assessment and Surveying Teams – reviewed use of platforms and mechanisms, including Perform Plus and KPI, to ensure robust enough

Discussion at Service Improvement Departmental Team Meeting (DMT) on progress and to collectively work through any areas of concern – this forum is used to problem solve and review the impact of agreed service improvement focus areas. Progress report to be presented by Head of Service.

Mechanism to trigger review of delayed cases - established mechanism to flag cases where an assessment has been made and approaching 6 month point and to trigger plan where this is the case. Also agreed a new process to ensure application forms a returned in a timely manner and if not we close the application until contact from residents/ family.

Benchmarking exercise – practice in neighbouring/comparable Local Authorities undertaken by Team Manager

2022:

Communication with residents:

February:

Documentation/new communication/sign off documents - a review will be undertaken of all documentation and standard communication materials, to provide greater clarity on process and transparency for all parties. This will be designed and brought to Service Improvement DMT for sign off.

Point of contact: The service will ensure going forward that all cases requiring a MA will have a named point of contact throughout their journey i.e. allocated OT or an allocated surveyor.

Mosaic and business reports – new workflow steps to be embedded, which will enable business reports to be run, to provide a live overview of the current status of any MA.

June:

Measuring impact of service improvement work – Head of Service to undertake mini review of impact of service improvement work.

Identification by HoS and Team Managers of further improvement measures – depending on the outcome of the review, further measures, adjustments to be identified and put in place.

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Report for: Cabinet 8th of March 2022

Title: Response to report by the Local Government and Social Care Ombudsman

Report Authorised by: David Joyce, Director of Housing, Regeneration and Planning
Fiona Alderman, Monitoring Officer

Lead Officer: Robbie Erbmann, Assistant Director of Housing/ Fiona Alderman, Monitoring Officer.

Ward(s) affected: All

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

1. Describe the issue under consideration

1.1. The Local Government and Social Care Ombudsman issued a report on 10 January 2022 in response to a complaint from a resident of the borough (Mr X) with regard to the Council's decision not to acquire his home, the manner in which this decision was made and the communication from the Council to Mr X.

1.2. The Ombudsman made recommendations to the Council with regard to the appropriate next steps. The Council is implementing these recommendations.

2. Cabinet Member Introduction

I just want to again take the opportunity to apologise to Mr X for the stress and uncertainty we have caused him. The Council is committed to implementing the Ombudsman's recommendations in full.

We have already issued a formal letter of apology to Mr X and paid him £1,000. Later, at tonight's Cabinet meeting, we will reconsider all possible options for the development site at Cranwood and Woodside Avenue.

However we also need to make sure that nothing like this ever happens again. That's why I have asked our new Chief Executive to review arrangements for how property decisions are taken in the future and acquisitions are made to make sure that the decision-making process is robust, transparent and accountable. I have also convened an independent external investigation into historical arrangements for property transactions.

3. Recommendations

3.1. It is recommended that Cabinet:

3.2 Note the findings and recommendations of the Ombudsman in the report shown at Appendix 1.

3.3 Notes the implementation of the Ombudsman's recommendations as set out in paragraphs 6.2 and 6.3.

3.4 Adopts this report as the Council's formal response under s.31 Local Government Act 1974, to be communicated to the Ombudsman.

4 Reasons for decision

4.1.1 As set out in the Ombudsman's report, Mr X has been found to have suffered injustice as a result of faults on behalf of the Council.

4.1.2 Where a report such as this is made by the Ombudsman, it must be laid before the authority (s.31 Local Government Act 1974). In cases such as this where the Council is operating executive arrangements, "the authority" means the executive, i.e. Cabinet (s.25(4ZA) Local Government Act 1974).

5 Alternative options considered

The Council could choose not to implement any of the recommendations made by the Ombudsman.

6 Background

6.1 The full background is set out in paragraphs 7 to 20 of the Ombudsman's report, as shown at Appendix 1. In summary, Mr X's complaints relate to the manner in which the Council communicated with him with regard to its potential acquisition of his house, in order to develop a neighbouring site, and the manner in which the Council made decisions regarding the acquisition of homes and the delivery of new homes. The Ombudsman has found that the Council's decision-making process was flawed and that the Council failed to communicate appropriately with Mr X.

6.2 The Ombudsman has made two recommendations following on from its investigation. The first recommendation is for the Council to 'apologise to Mr X for the faults found and the injustice caused to him and pay him £1,000 for the stress and uncertainty'. The Council has written to Mr X to apologise and has paid him £1,000.

6.3 The second recommendation is for the council to reconsider the proposals for the development of the site. A full report is being brought to Cabinet on the 8th of March a 2022 for Cabinet to consider the proposals and this is at Item 17.

6.4 The Council has therefore implemented both of the Ombudsman's recommendations. In addition, the Council has fully considered the Ombudsman's report and noted areas where it fell short, in particular with regard to its communication to residents and its decision-making process. These are areas where improvements have already been made since the events set out in the Ombudsman's report.

7 Contribution to strategic outcomes

The recommendations in the report contribute to the outcomes of the Borough Plan in particular Priority 5 – Your Council, which sets out under Outcome 17 that Haringey will be '17 A council that engages effectively with its residents and businesses.'

8 Statutory Officer Comments

Finance

8.1 As set out above the compensation payment has been made to Mr X and there is a further report on the Cabinet agenda taking forward recommendation from the LGO report on consideration of the proposals for the development of the site of the Former Care Home at 100 Woodside Avenue and the terraces at 102 to 108 and 110 to 116 Woodside Avenue and this contains appropriate finance comments.

Legal

8.2.1 Under the Local Government Act 1974 (the Act), the LGSCO has the power to investigate the complaint and to issue a report where there has been maladministration causing injustice; a failure to provide a service that it was the Council's function to provide; and a total failure to provide such service. The LGSCO has the power to make recommendations to the Council on how to improve its services and to put things right for the complainant. However, these recommendations are not mandatory and the Council does not have to accept or follow them.

8.2.2 Within 2 weeks of receiving the LGSCO's report, the Council is required to give public notice by advertisements in newspapers stating that copies of the report will be available to inspect by the public at the Council's offices for a period of three weeks (s.30 of the Government Act 1974).

8.2.3 The Act provides that the report shall be laid before the "authority" for consideration. In the case of a local authority operating executive arrangements (as in Haringey), "the authority" means the executive, i.e. Cabinet (s.25 (4) and (4ZA) Local Government Act 1974).

8.2.4 The Council's Monitoring Officer is obliged to prepare a report for Cabinet following the LGSCO findings and to consult with the Head of Paid Service and Chief Finance Officer for this purpose. This report must be sent to each member of the Council and Cabinet must meet within 21 days thereafter. The implementation of the proposal or decision must be suspended until after the report has been considered by Cabinet (s.5A Local Government and Housing Act 1989). Cabinet is required to consider this Monitoring Officer report on the findings of and response to the LGSCO's report.

8.2.5 Where Cabinet considers a LGSCO's report and it is considered that a payment should be made or other benefit given to a person who has suffered injustice, such expenditure may be incurred as appears appropriate (s.31(3) Local Government Act 1974).

8.2.6 Within 3 months of receiving the LGSCO's report or such longer period as may be agreed in writing with the LGSCO, the Council must notify the LGSCO of the action which the Council have taken or propose to take (s.31(2) Local Government Act 1974). If the LGSCO is not satisfied with the action which the Council has taken or propose to take, the LGSCO shall make a further report. The LGSCO can also require the Council to make a public statement in any two editions of a newspaper circulating the area within a fortnight (s.31(2A) and (2D) Local Government Act 1974).

8.2.7 An Ombudsman's report should not normally name or identify any person (s.30 Local Government Act 1974). Therefore, the complainant is referred to as 'Mr X.'

Procurement

8.3 Procurement comments

Equalities

8.4 Procurement notes the contents of the report which is not procurement decision.

9 Use of appendices

Appendix 1: Report by the Local Government and Social Care Ombudsman, Investigation into a complaint about London Borough of Haringey (reference number: 20 006 289)

10 Local Government (Access to Information) Act 1985

None

Local Government & Social Care OMBUDSMAN

Report by the Local Government and Social Care Ombudsman

Investigation into a complaint about London Borough of Haringey (reference number: 20 006 289)

10 January 2022

The Ombudsman's role

For more than 40 years the Ombudsman has independently and impartially investigated complaints. We effectively resolve disputes about councils and other bodies in our jurisdiction by recommending redress which is proportionate, appropriate and reasonable based on all the facts of the complaint. Our service is free of charge.

Each case which comes to the Ombudsman is different and we take the individual needs and circumstances of the person complaining to us into account when we make recommendations to remedy injustice caused by fault.

We have no legal power to force councils to follow our recommendations, but they almost always do. Some of the things we might ask a council to do are:

- apologise
- pay a financial remedy
- improve its procedures so similar problems don't happen again.

Section 30 of the 1974 Local Government Act says that a report should not normally name or identify any person. The people involved in this complaint are referred to by a letter or job role.

Key to names used

Mr X	The complainant
Property B	The neighbouring house

Report summary

Corporate services – Land

Mr X complained about the Council's handling of the possible purchase of his home related to the development of a neighbouring site.

Finding

Fault found causing injustice and recommendations made.

Recommendations

To remedy the injustice caused the Council should:

- apologise to Mr X for the faults found and the injustice caused to him and pay him £1,000 for the stress and uncertainty; and
- reconsider the proposals for the development of the site. This should be considered by full Council or Cabinet and the report should provide an accurate description of the history of the matter and should refer to this report. It should consider all the possible options for the site including the inclusion of the terrace of houses in the scheme. If the decision is to proceed with the development including the terrace of houses the Council should provide a remedy to the tenants who were wrongly assured that they would be able to stay in the properties. If a remedy cannot be agreed they can make a complaint to us.

The complaint

1. We refer to the complainant as Mr X. He complained about the Council's handling of the possible purchase of his home related to the development of a neighbouring site. He said that as a result of the Council's errors his family lived with uncertainty for six years. The uncertainty and changes affected planning for their jobs and future and caused considerable stress.

What we have investigated

2. We have investigated the Council's actions from early 2018 but have referred to earlier events for background.

Legal and administrative background

The Ombudsman's role

3. We investigate complaints about 'maladministration' and 'service failure'. In this report, we have used the word 'fault' to refer to these. We must also consider whether any fault has had an adverse impact on the person making the complaint. We refer to this as 'injustice'. If there has been fault which has caused an injustice, we may suggest a remedy. ***(Local Government Act 1974, sections 26(1) and 26A(1), as amended)***

How we considered this complaint

4. We produced this report after speaking to Mr X, considering all the information he and the Council provided and interviewing Councillor Ejiofor and officers of the Council.

5. We gave Mr X and the Council a confidential draft of this report and invited them to comment. The comments received were taken into account before the report was finalised.

6. We have decided to name Councillor Ejiofor. This is because we consider it is in the public interest to do so.

What we found

Summary of the key events

7. Mr X and his partner bought their house in 2013 for around £500,000. It is a three-bedroom property in one of two terraces of similar properties. The neighbouring house, which we will refer to as property B, was also privately owned. The rest of the houses were owned by the Council with tenants in occupation.

8. The Council had plans to develop adjacent land and to do so intended to demolish the two terraces. The first contact with Mr X about the plans was in 2014. Over the next four years there was contact between Mr X and the Council about the plans. The proposals changed over the years but that is not relevant to this complaint.

9. In July 2017 the Council adopted the site allocations development planning document. This designated the Council owned site, including the row of houses where Mr X lives, for housing development.

10. There was contact between the Council and Mr X and he instructed a surveyor to value his house and to look at what the Council's obligations to him might be.

11. In February 2018 Mr X chased the Council for progress. He had a holding reply from an officer. In April he contacted the Council again asking what was happening but did not receive a reply. At the same time the owner of property B told Mr X that the Council was not proceeding with the purchase of their properties.

12. In July the Council changed how it was to proceed with the development of the site. The original aim had been to do so with a developer, but it then moved to a plan of direct Council house delivery on the site.

13. In August 2018 Mr X entered into an arrangement, referred to as an option agreement, with a developer. This provided the developer with the right to purchase Mr X's property at any point over the next two years for £1.75 million. Immediately after Mr X had entered into that agreement the Council wrote to him saying it still wanted to proceed with the purchase of his property.

14. In September 2018 the Council's Cabinet formally agreed to the acquisition of both of the properties. Figures for the possible purchase price of the properties was agreed.

15. There was then correspondence between Mr X and the Council about what the options agreement meant for the possible purchase by the Council. The next significant event was in June 2019 when the Council bought property B for £2.15 million.

16. In October 2019 Mr X met with Council officers. The purchase price proposed was lower than had previously been discussed.

17. In January 2020 there was contact between Mr X and Council officers about a further meeting. In early February Mr X spoke with then then leader of the Council, Councillor Ejiofor, and it was agreed the Council would meet the costs of Mr X's legal representative attending the meeting. Officers wanted to urgently arrange a meeting with him and his legal representative. The Council said this was to consider the options for outright purchase of Mr X's home or a possible swap with other Council properties.

18. Then, in early March, before the meeting had taken place, there was a meeting between Councillor Ejiofor, various political representatives, and some of the council tenants of the other properties. Following the meeting Councillor Ejiofor decided not to proceed with the development of their homes.

19. The Council told Mr X in June it was not proceeding with the scheme in the form that required the purchase of his property.

20. In November the Housing and Regeneration Scrutiny Panel considered the process the Council had followed in proposing to include the terraces of houses in the development. The report set out the history. It said the value of property B was based on the view that the acquisition of that and Mr X's property would unlock the whole site.

Analysis

Communication

21. When an authority is looking to carry out major redevelopment that will often mean a number of properties will potentially be affected. Once the scheme has progressed there are compulsory purchase powers the Council can use to acquire land needed for the scheme. But before that stage is reached it can be the case that the proposals will be in the public domain and could affect the value of the potentially affected properties. This is just an inevitable part of the process and doesn't mean there has been fault that has caused injustice to someone so affected.

22. However, we can consider whether the Council has acted properly through the process. It should be even-handed in its dealings with people, its communications with people should be clear and transparent and it should follow its own constitution in how decisions are made.

23. The progression of the proposals for the land took many years but the significant period for this complaint were the events of July 2017 onwards. At that point the Council formally adopted the Local Plan which included the site allocations planning document. This identified the suitability of the whole site for development. That was in the public domain. It seems likely a developer recognised Mr X's house and the neighbouring property could be worth far more than market value because they would be needed if the Council was to develop the whole site.

24. In the first half of 2018 Mr X had asked the Council for an update, but the Council failed to respond. He had been contacted by the developer so when he had not heard from the Council, he entered into the option agreement. It is clear, that at this time, the Council must have been in negotiations with the owner of property B. The Council has failed to provide any information about that contact despite our repeated requests. But the Council had arranged a valuation of property B in early August so there must have been contact before then with the owner, however there was no contact with Mr X. Had the Council been in touch with him, even at this stage, he would have been able to make an informed decision about whether he should enter into the option agreement. All the information we have seen shows the Council was not being even-handed in the approach it was taking with Mr X and the owner of property B.

March 2020 meeting

25. We consider the key event was the decision not to proceed with the scheme involving the terrace of houses. This decision was made by the then Leader, Councillor Ejiofor, in March 2020 and altered the whole basis of the Council's proposals for the land. Those plans had been in contemplation for many years, were formally recognised in the Local Plan from July 2017 and formed the basis of the Cabinet decision to acquire the properties in September 2018.

26. The Council's constitution describes how decisions should be made. The Executive is the part of the Council which is responsible for most day-to-day decisions. The Executive is the collective term for the Leader, individual Cabinet Members, the Cabinet or a Committee of the Cabinet.

27. The Cabinet will ordinarily carry out all of the local authority's executive functions that are not the responsibility of any other part of the local authority, whether by law or under the Constitution, unless the Leader decides to discharge them

personally or allocate them to an individual Cabinet Member or a Committee of the Cabinet. The Leader may do this at any time.

28. The Executive has to make decisions which are in line with the Council's overall policies and budget. If it wishes to make a decision which is not in line with the budget or policy framework, this must be referred to the Full Council as a whole to decide.

29. In commenting on the draft of this report the Council commented at length on the above paragraphs, their accuracy and relevance to this complaint. However, they are taken directly from the Council's own constitution, and we consider they provide a useful summary of how decisions should be made.

30. We interviewed the three officers who attended the March meeting with Councillor Ejiofor. Two of the officers interviewed said they did consider after the meeting whether the decision by Councillor Ejiofor was in accordance with the Council's policy. One of the officers spoke to the then head of planning. He said she confirmed that in terms of the development plan there was no requirement to develop the whole site and it was possible to bring forward part of the site for development. They therefore considered the decision was in accordance with policy and was one the Leader was able to make.

31. Councillor Ejiofor said when interviewed that he did not consider it was necessary to refer the decision to Cabinet or full Council as it did not involve any expenditure. He said that he was aware of the previous decision to acquire both of the properties and that one had already been purchased. But, he said, circumstances had changed. It had not been possible to purchase Mr X's property because of the option agreement. And the delay in bringing the scheme to completion meant the other residents had gained momentum in their opposition to having to leave their homes. He also considered the loss of the terrace of houses as part of the scheme would not have a significant impact on the number of units that would still be able to be developed on the site. He thought it was probably a reduction of about 6 or 7.

32. The decision by Councillor Ejiofor may have been, on a strict interpretation of the constitution, one he was entitled to make but we do not consider it was made with due regard to all the relevant facts. The basis for the Council's housing proposals for the site for three years had been that the whole site needed to be developed to maximise the number of properties and to meet the Council's stated aims for direct council house provision. It was particularly important to be able to develop this part of the site as there were fewer physical constraints in the area and the properties built there would be sold to generate income to finance the development.

33. The Council, in a meeting of the Cabinet, had decided to purchase the properties to enable the development to proceed in this way. That report did refer to the possibility of only purchasing one of the properties and that the scheme would still be viable on that basis. But without any of the terrace of houses area included, it was unlikely the scheme would be viable. It was on this basis that approval was given to buy both the properties. And by the time of Councillor Ejiofor's decision in March 2020 the Council had spent over £2 million on property B so had made a significant financial commitment to proceeding with the scheme on that basis.

34. Councillor Ejiofor suggested circumstances had changed. That may have been the case, although we are not persuaded there was a significant change, but, even if there were, then the changes being proposed should have been subject to

proper scrutiny and analysis of the options. We consider this was an ill-considered decision based largely on the wishes of the tenants and frustration with the delays in buying Mr X's house. There was no analysis at the time of what the loss of the terrace of houses meant for the viability of the scheme. This lack of adequate analysis and consideration of the options and consequences of the decision is fault.

35. We have considered carefully the Council's comments on the draft of this report. The thrust of its argument is that Councillor Ejiofor was entitled to make this decision because there had been no firm commitment to proceed with the development of the site including the terrace. This position omits the significant point that the Council had already committed a substantial amount of public money in buying the other property which only had that value to the Council as part of the larger scheme. This decision meant that expenditure had been for nothing. The basis for our finding is that there is no demonstration of proper evaluation and weighing up by Councillor Ejiofor. There was no briefing paper or discussion, the decision was entirely his, taken at the time of the meeting. It is illustrative of the lack of proper consideration that this was not in contemplation even a few weeks before when he had spoken to Mr X and a meeting was to be arranged with officers.

Report to the scrutiny committee

36. There is a further area of concern. In the report to the scrutiny committee in November 2020 it said the decision not to proceed with the inclusion of the row of terraced houses had been made in June 2019. The Council has not provided any evidence to show there was any consideration then. We therefore consider this reference to June 2019 is wrong. This meant that an inaccurate picture of events was presented to the scrutiny committee.

Conclusions

37. Based on the information we have seen, we consider the decision by the then Leader, Councillor Ejiofor, in March was flawed. Had he not made that decision, then the development is likely to have progressed as had always been intended including all of the terrace of properties. Although it is not possible to say with certainty whether the Council and Mr X would have reached agreement about the purchase of his house. The Council has continued to consider how to develop the site without the terrace of houses. More is now known about the site and how many units it might accommodate and plans are being progressed on that basis.

38. Although Councillor Ejiofor gave a commitment not to remove the tenants, we do not consider it is right the Council should be held to a flawed decision. We consider the Council should reconsider its plans for the site with all options open for consideration.

39. There was also fault in the communication with Mr X. At a key point in 2018 the Council failed to keep in touch with him. It was inevitably the case that a scheme of this size and complexity would take years to progress and that would cause uncertainty and worry for people in the properties likely to be affected. That is not as a result of fault. But the faults found here have increased the stress and uncertainty for Mr X.

40. The lack of even-handedness in the Council's approach has also increased Mr X's sense that he was not being treated fairly by the Council.

41. There was further fault in the report to the scrutiny committee but that did not cause any injustice to Mr X.

Recommendations

42. The Council should:

- apologise to Mr X for the faults found and the injustice caused to him and pay him £1,000 for the stress and uncertainty; and
- reconsider the proposals for the development of the site. This should be considered by full Council or Cabinet and the report should provide an accurate description of the history of the matter and should refer to this report. It should consider all the possible options for the site including the inclusion of the terrace of houses in the scheme. If the decision is to proceed with the development including the terrace of houses the Council should provide a remedy to the tenants who were wrongly assured that they would be able to stay in the properties. If a remedy cannot be agreed they can make a complaint to us.

43. The Council must consider the report and confirm within three months the action it has taken or proposes to take. The Council should consider the report at its full Council, Cabinet or other appropriately delegated committee of elected members and we will require evidence of this. ***(Local Government Act 1974, section 31(2), as amended)***

Decision

44. We have completed our investigation into this complaint. There was fault by the Council which caused injustice to Mr X. The Council should take the action identified in paragraph 42 to remedy that injustice.

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Report for: Cabinet 8th of March 2022

Title: Consideration of the proposals for the development of the site of the Former Care Home at 100 Woodside Avenue and the terraces at 102 to 108 and 110 to 116 Woodside Avenue.

Report authorised by: David Joyce, Director of Housing, Regeneration and Planning

Lead Officer: Robbie Erbmann – Assistant Director for Housing

Ward(s) affected: Muswell Hill

Report for Key/ Non Key Decision: Key

1. Describe the issue under consideration

1.1 The former Care Home site at 100 Woodside Avenue became vacant and surplus to requirements in 2011.

1.2 In 2012, the Council began considerations for the development of the site for housing linked to plans for the adjoining primary school, and in 2014 first approached the owners of the two freehold homes known as 104 and 106 Woodside Avenue both of which adjoined the site for possible acquisition. These plans did not proceed.

1.3 During 2016 to 2018 the Council was progressing plans for the Haringey Development Vehicle (HDV) and this site was one of the key development sites in the first phase. The owners of 104 and 106 Woodside were again contacted about possible acquisition of their homes during this period. In 2018 plans for the HDV were abandoned.

1.4 In July 2017 the Council adopted the site allocations development planning Document (SA51). This designated the Council owned site, including the two terraces of houses for housing development.

1.5 On the 11th September 2018 Cabinet approved the acquisition of two freehold properties not in Council ownership at 104 and 106 Woodside Avenue with a view to including them within a future development of 100 Woodside Avenue.

1.6 The Council exchanged contracts for the acquisition of 106 Woodside Avenue in December 2018 and completed the acquisition in June 2019 for £2.15m

1.7 The Council was unable to complete its negotiations on 104 Woodside Avenue as the owner had entered into an 'Option Agreement' with a developer in August 2018, which meant the Council could not acquire the property directly from the freehold owner until the option period had ended. The option was for a period of two years (until August 2020), which gave the option holder an option to acquire 104 Woodside Avenue for a sum of £1.75m. The Council tried to acquire the

option; however, the purported seller was unable to show ownership of the option and therefore could not assign it. It was therefore not possible to acquire the option.

1.8 In March 2020, the then Leader of the Council decided not to decant its tenants of 102 to 116 Woodside Avenue, and to focus development on the remainder of the site, thus making the acquisition of 104 Woodside Avenue unnecessary, unless the Council decided to bring forward a second phase of the development at a later date. The owner of 104 Woodside Avenue was informed through his solicitors of this decision on the 12th June 2020. This decision was later described by the Local Government and Social Care Ombudsman as 'flawed' following a complaint.

1.9 The Council's Housing Delivery team submitted an application for the demolition of the former Care Home site (100 Woodside Avenue) and the construction on that site only of 41 new homes in November 2021. The application has been registered and consulted upon (HGY/2021/2727) and is due for consideration by the planning authority.

1.10 The Local Government and Social Care Ombudsman issued a report on 10 January 2022 in response to a complaint from a resident of the borough (Mr X) with regard to the Council's decision not to acquire his home, the manner in which this decision was made and the communication from the Council to Mr X.

1.11 One of the recommendations from this report was for the Council to reconsider the proposals for the development of the site.

1.12 Prior to the issue of the report, the Council commenced a procurement exercise for a contractor to build out the scheme if planning was successful. This procurement has been put on hold while the reconsideration has been taking place.

2. Cabinet Member Introduction

I want residents to be assured that the Council has considered, in detail, every alternative option for this site. I've welcomed the opportunity of going through the options for this site from first principles with detailed financial analysis.

The weight of evidence in favour of the preferred option makes it clear that it is really the only option we should be taking forward. It performs better financially than all the other options, delivers homes more quickly and minimises disruption to residents.

3. Recommendations

3.1 Cabinet is recommended to agree the following:

a) Not to acquire 104 Woodside Avenue
b) Not to consider the potential decanting of the tenanted homes belonging to the Council at 102 and 106 to 116 Woodside Avenue
c) To proceed with the development of the proposal for 100 Woodside Avenue as outlined in the planning application HGY/2021/2727 as set out in paragraph 3.2 of this report

d) That a further report will be brought to Cabinet for final decision regarding this development in due course.

4. Reasons for decision

4.1 Since the decision not to include the terraces on Woodside Avenue in March 2020 in the redevelopment of 100 Woodside Avenue site, the Council has developed plans for a scheme of 41 new homes (32 social rented and 9 outright sale) on the site of the former care home only. This is the scheme set out in planning application HGY/2021/2727. This will also mean the retention of the neighbouring terrace of existing Council homes (see para 3.2 below shaded in light grey – 7 Council/HCBS homes, excluding one private freehold home at 104 Woodside Avenue). This would result, including the existing tenanted homes in the calculation, in a total of 39 council-owned homes on the whole site.

4.2 The designs of the proposed site (as per HGY/2021/2727) if preferred option were to be developed out can be seen below:



4.3 This iteration of the scheme has been tested and is the most financially advantageous of the proposed options.

4.4 Progressing with these plans for the site and continuing the process of seeking planning approval for this version of the scheme is the preferred option. It is the most financially advantageous scheme and is at an advanced stage of design development. This scenario would therefore most strongly support continued achievement of Priority 1 of the Borough Plan – a vision of a ‘safe, stable and affordable home for everyone, whatever their circumstances’.

4.5 The preferred option would mean that the Council does not have to demolish residents’ homes at 102, 106-108, and 110-116 Woodside Avenue. It would also mean the Council had no reason to acquire the freehold property at 104 Woodside Avenue.

4.6 For the purposes of appraising the options, the assumption that has been followed is that the cost of the acquisition of 106 Woodside Avenue is not included in the comparative appraisal as it has already been incurred.

4.7 Given that 106 Woodside Avenue does not now form part of the preferred option, it would continue to be leased to the Haringey Community Benefit Society (HCBS). The price paid for the property reflected the assessed land assembly value at that time. Subsequent to that, detailed design work on the site has made it clear that the development value of including the terraces on the scheme is lower than previously thought. In the period since, the Council has changed its valuation methodology for acquisitions of this nature.

5. Alternative options considered

5.1 Alternative Option 1

5.1.1 Not to develop the site for housing. The site has a site allocation in Haringey Council's Development Planning Document, and any alternative use is not likely to gain planning approval. This would mean that the site would continue to be underutilised and not deliver much needed housing in the borough.

5.2 Alternative Option 2

5.2.1 An option has been considered and tested for acquisition of the remaining freehold house (104 Woodside Avenue), decanting of the existing 7 Council/HCBS homes in the terrace, and the re-development of the whole site. Architects indicate this redevelopment would deliver 55 new homes across the whole site.

5.2.2 Below are some indicative plans for the re-development of the whole site, producing 55 homes in total:



5.2.2 Testing of this option by our Architects has indicated that it is likely to be undeliverable because of the additional requirements for access roads, parking, refuse storage and amenity space, which do not apply if the existing homes are retained.

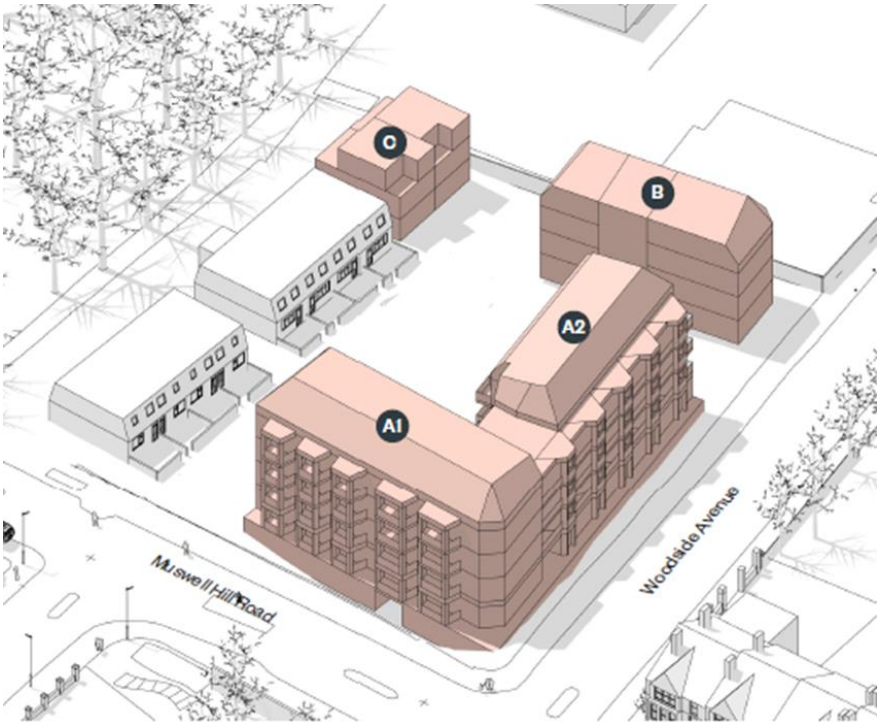
5.2.3 This option has also been tested financially. In this option, as well as option 3, we have assumed that it would cost us £1.75m to purchase Mr X's property as this is the most recent offer that he has made us. In our financial modelling, officers began by seeing if the scheme could work financially if 40 of the 55 homes were to be delivered for social rent (i.e., 1 more net council home than the preferred option). Officers then tested other potential mixes of council and private housing. Ultimately Officers found that this option is less financially advantageous than the preferred option even if only 32 homes in block A are delivered for social rent and all the remaining 23 new homes are sold. This would continue to be the case even if Mr X was prepared to sell his property to the Council for £850,000. This alternative option would also have a net loss of 7 council homes compared to the preferred scenario.

5.2.4 This option would further require a new consultation process based on a 'meaningful' design under s105 of the Housing Act 1985 due to the loss of existing homes and the permanent decanting of existing tenants. If one was to assume the completion of that consultation and a consequential favourable decision that involved the demolition of the existing properties, there would then be a need to assess the existing tenants' needs and, once identified, decanting them into suitable alternate homes. Officers' experience indicates this process could take more than a year to achieve.

5.2.4 For these reasons, Cabinet is recommended not to consider proceeding further with Alternative Option 2.

5.3 **Alternative Option 3**

5.3.1 The Council has considered a third option as a 'mid-point' between the preferred option, and alternative option 2. The following image helps demonstrate the option in question:



5.3.2 In option 3, planning application HGY/2021/2727 would be progressed and approval would be sought. Blocks A1 and A2, which are planned to contain 32 social rented homes, would then be put out to tender for a main build contractor and their development progressed. In the meantime, Blocks B and C, and the existing terrace would be redesigned to facilitate a future re-development. Whilst the re-design was happening, the residents of the terrace would be consulted with and depending on the outcome of that consultation and further decision-making, new homes would be found for them. This option would also necessitate the freehold of 104 Woodside Avenue being acquired. The re-designed Blocks B, C and terrace would then be progressed as a new planning application and brought forward accordingly.

5.3.3 The Council's Architects have indicated that this phased iteration of the scheme would run into many of the same issues as those set out in option 2 because of the additional amenity requirements caused by any increased density.

5.3.4 Officers have also tested the financial viability of this option, which performs even more poorly than option 2, even if all homes other than those in Blocks A1 and A2 were built for market sale. This is due to an increase in interest and a later receipt of cross subsidy. Moreover, like option 2, this scenario would see a net loss of seven Council rented properties from the site.

5.3.4 For these reasons, Cabinet is recommended not to consider proceeding with Alternative Option 3.

6. Background information

6.1. The development of proposals for the site at 100 to 116 Woodside Avenue are influenced by:

6.1.1. Its proximity to the adjacent conservation area.
6.1.2. The existing building heights that surround the site.
6.1.3. The presence of three large Thames Water Mains that run through the middle of the site
6.1.4. The presence of a large Thames Water sewer that runs through the site
6.1.5. The adjacent primary school.
6.1.6. The adjacent Highgate Woods (Queens Wood).
6.1.7. The Parkside Walk that ends adjacent to the site.
6.1.8. The GLA requirement for any Council led delivery of housing on its own land to have a minimum of 50% affordable homes in the proposals.
6.1.9. The costs of land assembly.
6.1.10. Home loss and disturbance costs for decanting existing residents.
6.1.11. Security costs whilst the building is vacant.
6.1.12. The Council's target for its direct delivery housing to be a minimum of Carbon Neutral.

7. Contribution to strategic outcomes

7.1. The proposal will support the key elements for Housing, People, and Place priorities in the Borough Plan –

Housing – our vision is for a safe, stable and affordable home for everyone, whatever their circumstances

People - our vision is a Haringey where strong families, strong networks and strong communities nurture all residents to live well and achieve their potential

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.

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

Finance

8.1. There are three options compared with the preferred option to progress the development.

8.2. Option one was discounted because there is need to build social rent homes to cater for the housing needs in the borough.

8.3. With regard to the estimated respective financial implications of the options, the total cost of development in the preferred option is estimated to be about £7.5m lower than option 2, and £7.2m lower than option 3.

8.4. Similarly, the Net Present Value of the preferred option is estimated to be £1.1m and £2.3m better than Options 2 and 3 respectively. The final scheme cost for the preferred option, should members resolve it be progressed, will be reported in a later decision-making report to cabinet.

Strategic Procurement

8.5. Procurement notes the contents of the report which is not procurement decision. Procurement notes that the statement in section 1.12 that the separate decision referred to is on hold.

Legal

8.6 The Cabinet on 11th September 2018 made a decision to acquire both 104 and 106 Woodside Avenue for the purpose of including them (together with the rest of the Council's residential properties along Woodside Avenue) in a proposed redevelopment of 100 Woodside Avenue (also known as the Cranwood site). The Council was unable to acquire 104 Woodside Avenue for the reasons set out in this report. A complaint was lodged with the Local Government Ombudsman. One of the recommendations of the LGO contained in a report dated 10th January 2022 was for the Council to: *"reconsider the proposals for the development of the site. This should be considered by full Council or Cabinet and the report should provide an accurate description of the history of the matter and should refer to this report."* The decision to reconsider the development of the site is a matter for Cabinet rather than full Council.

8.7 The recommendation for the site is to proceed with the development of 100 Woodside Avenue site only for the reasons set out in this report. This will exclude the row of residential properties known as 102 to 116 Woodside Avenue from being developed. As a result there is no necessity for the Council to proceed with the decision to acquire 104 Woodside Avenue and Cabinet is being asked to reverse its previous decision to acquire that property.

8.8 The Head of Legal and Governance (Monitoring Officer) has been consulted in the preparation of this report and the Cabinet is able to make the decisions set out in the recommendations.

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 apply to the first

part of the duty.

8.11 The proposed decision is to reconsider the proposals for the development of the site of the Former Care Home at 100 Woodside Avenue and the terraces at 102 to 108 and 110 to 116 Woodside Avenue in Muswell Hill. The decision will increase the supply of Council rented homes which are genuinely affordable to the borough's residents, including a number of homes specifically designed for letting to tenants requiring wheelchair access. This is likely to have a positive impact on individuals in temporary accommodation as well as those who are vulnerable to homelessness. Data held by the council suggests that women, young people, and BAME communities are over-represented among those living in temporary accommodation. Furthermore, individuals with these protected characteristics, as well as those who identify as LGBT+ and individuals with disabilities are known to be vulnerable to homelessness, as detailed in the Equalities Impact Assessment of the Council's Homelessness Strategy. As such, it is reasonable to anticipate a positive impact on residents with these protected characteristics.

8.12 There may be some potential negative impacts of the development of the Cranwood site, principally relating to Options 2 and 3 of the report, these two options would require the decanting of seven tenanted properties and some of the tenants in these properties have protected characteristics, specifically disabilities which could have a negative impact on them.

9 Use of Appendices

Appendix A – Red Line Drawing of the Site

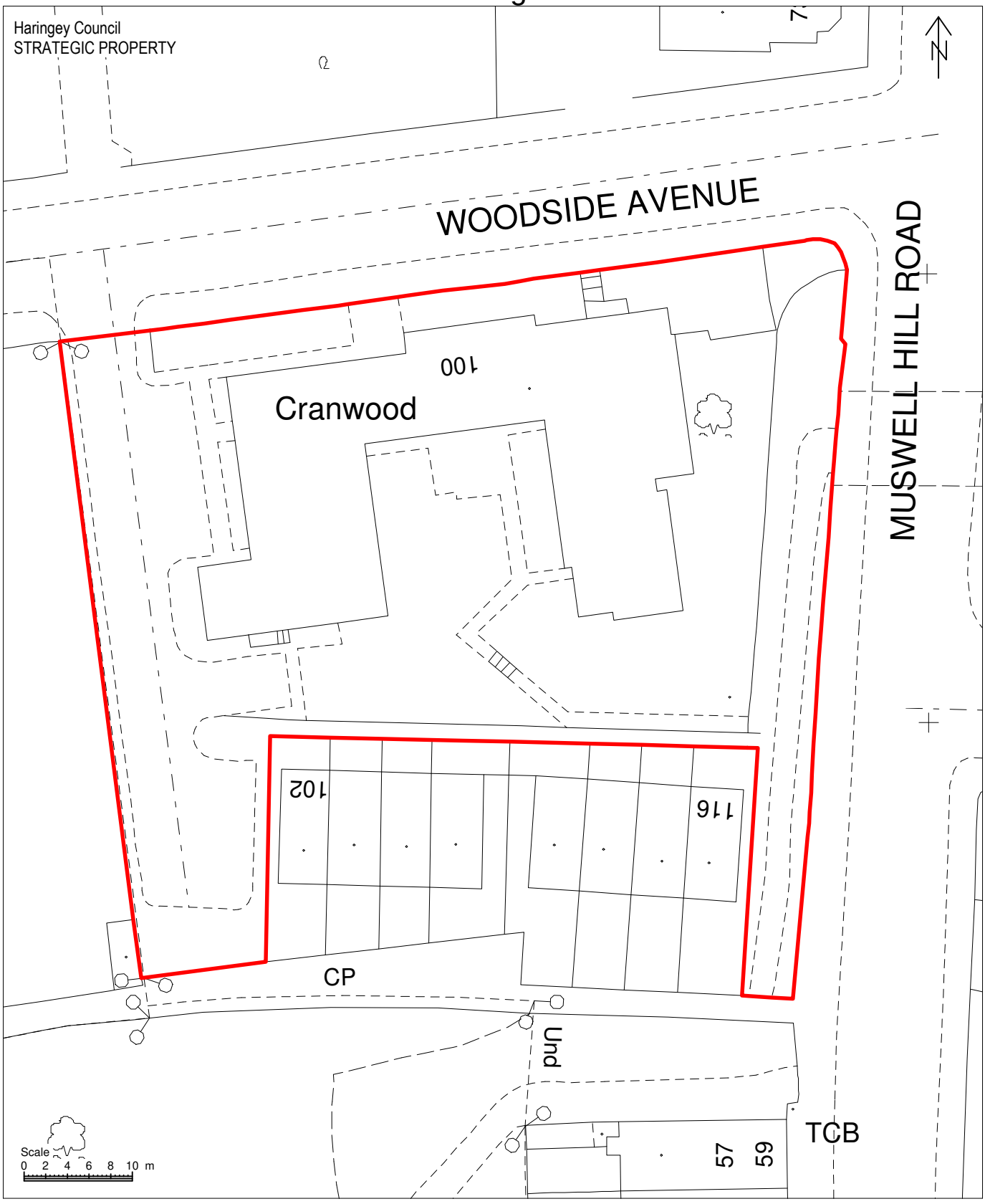
10 Local Government (Access to Information) Act 1985

a. Background document – Cabinet report 11th September 2018 Cabinet Report

b. Background document – Cabinet report 9th July 2019 Cabinet Report

Appendix A

Red Line Drawing of the Site



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WOODSIDE AVENUE,
LONDON
N10 3JA

Edged red - Demise

Title no. : FHO MX466315

Overlay : Hss - Misc

Scale 1:500

Plan produced by Sean Purcell on 29/10/2020

Drawing No. BVES A4 Misc

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Report for: Cabinet – 8 March 2022

Title: Adoption of Walking and Cycling Action Plan

Report authorised by: David Joyce, Director of Housing, Regeneration and Planning

Lead Officer: Maurice Richards, Transport Planning Team Manager, and Neil Goldberg, Transport Planning

Ward(s) affected: All

Report for Key/ Non Key Decision: Key Decision

1. Describe the issue under consideration

1.1. This report documents the responses to a consultation on the Draft Haringey Walking and Cycling Action Plan (WCAP/Plan) (8 November 2021 – 10 January 2022) and the Council's response to these, and recommends Cabinet adopts the WCAP as amended in response to the consultation responses.

1.2. Producing a WCAP is a Council commitment in the adopted 2018 Transport Strategy. The WCAP is needed to ensure the Transport Strategy is delivered, particularly the Council's aspiration to enable more walking and cycling in the borough and fulfil its stated ambition to have a reputation for being a walking and cycling borough both regionally and nationally. The WCAP will also be used to better target future Local Implementation Plan (LIP) funding from Transport for London (TfL) and other sources of funding and will assist transport planning discussions as part of the planning application process.

2. Cabinet Member Introduction

2.1. Transport is central to the success and prosperity of our residents and local businesses. Everyone whether a pedestrian, cyclist, bus passenger, motorcyclist, motorist or rail user engages with Haringey's transport infrastructure every day. Making the best use of our existing assets and spending money wisely to improve sustainability, social justice, safety, ease of movement and usage is one of the important roles for the Council. Investment in transport programmes and infrastructure has a key part to play in supporting delivery of all our aspirations in the Borough Plan and in the Haringey Transport Strategy.

2.2. Haringey's Transport Strategy (2018) sets the transport objectives for the borough over the next 10 years and outlines clear priorities to reduce the reliance on the private car, increase walking and cycling and enhance the public transport network. At the heart of this strategy is the need to tackle air quality, improve quality of life and wellbeing and working towards a carbon zero borough. Enabling more trips to be made by walking and cycling in Haringey remains the overarching objective of the Strategy.

2.3. The Transport Strategy lists the following aspirations:

- Haringey has a reputation for being a walking and cycling borough both regionally and nationally
- That more journeys will be taken by walking and cycling
- That active travel will have improved the wellbeing of our residents, reducing obesity, and improving air quality
- To have a high quality accessible and wheelchair friendly public transport network meeting the needs of Haringey residents, visitors, and businesses.

2.4. The WCAP is a key tool to achieve the above aspirations. The delivery of proposals in the Plan as part of the Council's ambitious 'Streets for People' initiative will enable far greater levels of walking and cycling in Haringey improving the health and well-being of residents and helping tackle climate change by reducing the reliance on the private motor car. In doing so, the Plan will be a key driver towards a safer, cleaner, greener, fairer and happier borough.

3. Recommendations

Cabinet is asked:

3.1. To note the responses received in response to the consultation on the Draft Walking and Cycling Action Plan (WCAP), the Council's responses to these set out in Appendix C, and the consequent changes made to the Draft Walking and Cycling Action Plan;

3.2. To adopt the Walking and Cycling Action Plan as set out at Appendix D;

3.3. To delegate to the Assistant Director for Planning, Building Standards and Sustainability to make changes to the formatting of the Walking and Cycling Action Plan and the maps within it before publication.

4. Reasons for decision

4.1. The WCAP is needed to deliver the Council's adopted Transport Strategy and to enable more trips in Haringey to be made by walking and cycling. The WCAP ensures clarity around the Council's active travel priorities for managing our transport network and to support the delivery of the Borough Plan objectives for growth and regeneration, as well as improving health and environmental quality. The WCAP will also help support the emerging New Local Plan to help shape new developments.

5. Alternative options considered

5.1. **The alternative options considered are:**

Option 1 – Not to adopt the WCAP. The disadvantages of this are that the Council would not meet its commitment in the Haringey Transport Strategy to produce a WCAP, it would not have a specific adopted guidance plan to enable increased walking and cycling in the borough, and there would not be an agreed strategic approach to walking and cycling which sets priorities, supports

coordinated decision making and will help the Council target resources effectively having regard to Transport for London's (TfL's) currently very limited funds as a consequence of Covid-19.

Option 2 - To adopt the WCAP without any changes to the Draft WCAP following public consultation. This option would be contrary to the requirement for the Council to take into account all consultation responses received before adopting the WCAP. This would mean not taking account of important feedback from the community and the stakeholders and would not allow changes to be made to the Draft WCAP which would improve the robustness of the Plan as a whole.

6. Background information

Strategic Context

6.1. The strategic context for the WCAP is provided by the Borough Plan, Transport Strategy, Climate Change Action Plan, Air Quality Action Plan, School Streets Plan, and Good Economy Recovery Plan. These are summarised in Appendix A. Of particular importance is the Haringey Transport Strategy (2018) which contains the ambitious outcome that active travel should be the default choice in the borough with a linked commitment to prepare a Walking and Cycling Action Plan (WCAP) to help drive the active travel agenda and to improve the health and well-being of residents and improve the environment from the effects of our transport system.

Draft WCAP

6.2. To develop the Draft WCAP, officers engaged with neighbouring boroughs, businesses, residents, community groups (including disability/access groups) and TfL to develop a priority programme list of projects and an integrated walking and cycling network. The Draft WCAP was drawn up in parallel to the Council's Streetspace Plan in response to the pandemic, which used an interactive online map to ask the community to make suggestions for how the Council could make it easier and safer for people to walk and cycle locally, shop on their local high street, and reach their local green spaces, schools and services.

6.3. An important channel for feedback on the emerging document was the Haringey Transport Forum which has met since 2012 and provides a discussion group with residents and community groups on strategic transport topics.

6.4. In February 2021 the Council approved a Draft WCAP for public consultation. The vision in the Plan was that by 2031 Haringey wants:

- a reputation for being one of the best walking and cycling boroughs, both regionally and nationally
- walking and cycling are natural choices
- active travel to have improved the wellbeing of our residents, reducing obesity and improving air quality
- to reduce motor vehicles use for short trips with a shift to active travel

6.5. The Draft WCAP proposed a hierarchy of modes to help deliver Haringey's sustainable transport future and help the Council plan its investment and funding. To make streets safer for walking and cycling in Haringey, the following modal priority was included:
a) Pavement users
b) Cycling
c) Public Transport
d) Electric Vehicles
e) Motor Vehicles

6.6. At the centre of the WCAP were 5 draft policies. The draft policy titles were:
1) Increasing active travel
2) Walking
3) Cycling
4) Low Traffic Neighbourhoods
5) Re-allocating road space to enable sustainable growth and to make walking and cycling safer

6.7. The Draft WCAP sets out a range of schemes that will form the basis of an emerging high-quality network in Haringey making walking and cycling natural choices including School Streets and Low Traffic Neighbourhoods. A key part of the Draft WCAP was the Delivery Plan which identified the specific projects and programmes proposed for delivery through the life of the plan subject to appropriate local engagement, detailed design and confirmed funding.

6.8. The Delivery Plan identified future transport schemes to meet the aims of the WCAP – ranging from future cycling routes, Low Traffic Neighbourhoods, walking schemes, the School Streets programme, the Council's behavioural change programme and delivering cycle parking - their deliverability and cost, whether funding has been allocated and/or possible future sources of funding. The Wood Green and Tottenham regeneration areas had a greater focus to ensure the planned development and growth occurring in these areas is supported by a sustainable transport system which reduces car use in favour of walking and cycling.

Consultation on the Draft WCAP

6.9. On 9 February 2021 Cabinet approved public consultation on the Draft WCAP. The Cabinet approved draft was made available on the Council's website from October 2021 for review with the formal public consultation on the Draft WCAP taking place from Monday 8 November 2021 to Monday 10 January 2022 (9 weeks). The period between Cabinet approval and the launch of the public consultation was a consequence of ongoing funding uncertainties and the resource implications of the LTN project. The below table summarises strategies used to maximise engagement during the public consultation:

Web	Consultation hosted on dedicated website (https://haringeywalkingcycling.commonplace.is/en-GB) and linked to via dedicated page on Council website containing all key information

	All key documents published including FAQs and summary document Information available on website about how to request information in other languages or formats
Social media	Twitter, Facebook, Instagram plus other online media outlets including Polish and Turkish media. A digital marketing campaign was undertaken
Haringey People magazine	Featured advert for the consultation
Haringey People Extra bulletin & Haringey Business Bulletin	Item included within email bulletins
Survey	Could also be completed online or in person deposited at the borough's libraries. An accessible version of the survey was also made available for completion
Translation sheet	A translation sheet was made available at Haringey libraries and on the Commonplace website to assist residents and stakeholders to request copies of the draft WCAP in different languages
WCAP summary guide and leaflet	In addition to the draft WCAP, a summary guide was made available at the libraries and online, as well as an A4 leaflet which directed the community to the draft WCAP online and the consultation events
In person pop-up engagement sessions	Four sessions took places as follows: Saturday 20 November 2021, 10am – 2pm - Marcus Garvey Library Saturday 27 November 2021, 10am – 2pm - Alexandra Park Library Saturday 4 December 2021 10am – 2pm - Stroud Green and Harringay Library Saturday 11 December 2021 10am – 2pm - St Ann's Library
Online public meetings	Two online public meetings took place as follows: Wednesday 15 December 2021, 6pm – 8pm Thursday 6 January 2022, 6pm – 8pm
The Haringey Transport Forum	Presentations were given to the Forum and the membership was used to help promote the public consultation
The Streetspace Plan and the Low Traffic Neighbourhoods consultation databases	Those who asked to be kept up to date on the council's consultations following their involvement in either, or both, of these consultations, were notified of the draft WCAP consultation launch.

Responses to public consultation

6.10. The headline statistics for the public consultation on the Draft WCAP are as follows:

- Engaged 1500 to 2000 people

- 786 completed questionnaires
- 5964 visitors to dedicated Commonplace website
- 1138 comments on the Commonplace map from 412 respondents
- 90 Emails received
- 706 Social media snap survey responses
- Circa 110 individuals attended webinar sessions

6.11. The results of the questionnaire/survey showed strong support for the vision of the Draft WCAP as well as the active travel, walking, cycling and reallocation of road space policies.

6.12. Key themes identified by respondents included the following:

- That safety is a prime concern and a key inhibitor to more active travel in the Borough. Safety concerns expressed included speeding, dangerous junctions with a lack of pedestrian crossings and illegal double parking reducing visibility.
- A desire for more 'walkable' and 'cyclable' places as well as identification of current barriers to this including a lack of connected footpaths, dedicated routes and poor surface conditions.
- Ensuring active travel is accessible to all users. Suggestions in this regard included improving road surfaces, widening of pavements, greater consideration of the role of public transport and electric bike hire schemes.
- The need for improved cycling/street infrastructure and other incentives to encourage active travel including more bike hangers, more street maintenance, benches, segregated cycle paths.
- The need for greater clarity about delivery and funding including what needs to be delivered, were and when

Amendments to WCAP

6.13. All responses to the consultation have been reviewed and analysed. A consultation report detailing the analysis is set out at Appendix B. Having regard to the responses a variety of changes have been made to the Draft WCAP. The key changes proposed are summarised below with further details provided in Appendix C:

- Haringey 'Streets for People' branding to be launched in Plan
- Factual changes and updates since launch of Plan
- Details of 3 approved LTNs and process undertaken to date
- Fewer maps and less technical information
- Strengthening of walking section
- Information on other Council investment not specifically for active travel
- Strengthening the case for behaviour change initiatives alongside infrastructure
- Greater recognition of the role of public transport in supporting the aims of the WCAP
- Additional detail around delivery and funding

- Greater priority for new cycleways - Green Lanes for north/south cycling connectivity and Wood Green to Tottenham for east/west connectivity
- Increased priority for bike hangar roll out and launching dockless bike hire scheme
- More equalities info included in Plan including in relation to older and disabled people and regarding the safety of those with protected characteristics

6.14. The WCAP proposed for adoption is provided as Appendix D.

Equalities Impact Assessment (EqIA)

6.15. An EqIA was previously prepared to assess the likely impacts of the Draft WCAP on groups with protected characteristics as defined by the Equality Act 2010. Having regard to the recommended amendments to the Draft WCAP as set out above an updated EqIA has been prepared for the adoption version of the WCAP. This is provided at Appendix E. The EqIA gives consideration to potential impacts of the WCAP on other groups not specifically protected under the Equality Act including parents/carers and/or socio-economic groups. Furthermore, it takes account of more advanced thinking on potential impacts on people with disabilities, such as has been reflected in recent EqIAs for various low-traffic neighbourhood schemes.

6.16. In summary, the measures are considered to advance equalities for many protected groups, albeit with a potentially small disadvantage noted for those solely reliant on motor vehicles for transport for which mitigations are outlined. On balance, the WCAP is considered to promote equality of opportunity among protected groups. The EqIA of the draft WCAP has been updated to reflect the points raised above and the lessons learned to date relating to the three Low Traffic Neighbourhoods approved for implementation in December 2021 and for which equality impacts were examined thoroughly.

Next Steps & Monitoring

6.17. Once adopted the WCAP will be published on the Council's website together with a summary version of the WCAP. The WCAP at Appendix D will be desktop published with new maps and will be used as the formal launch of the Council's 'Streets for People' brand.

6.18. The adopted WCAP will help deliver the Council's adopted Transport Strategy and once the projects are implemented will enable more trips in Haringey to be made by walking and cycling. The WCAP will help ensure clarity around the Council's active travel priorities for managing our transport network and to support the delivery of the Borough Plan objectives for growth and regeneration, as well as improving health and environmental quality. The WCAP will also help support the emerging New Local Plan to help shape new developments.

6.19. The WCAP will also be used to better target future LIP funding from TfL and other sources of funding.

6.20. To understand whether the WCAP targets are being delivered it is important that the Council properly monitors active travel. The WCAP sets out how the Council will improve monitoring capability for active travel. The WCAP is a 10-year plan and the delivery plan allows ongoing monitoring against deliverables. It would be appropriate to formally review the Plan halfway through its life i.e. around 2027 or sooner.

6.21. The WCAP will sit alongside the Council's Road Danger Reduction Action Plan (RDRAP) – a document that sets out how the Council is applying the Vision Zero Strategy compiled by the Mayor of London, Transport for London and the Metropolitan Police. The RDRAP articulates how, subject to funding, the Mayor of London's aspiration for the capital can be delivered locally by having no-one killed or seriously injured (KSI) casualties on Haringey's roads by 2041. The Road Danger Reduction Investment Plan for 2022/23 sets out how the Council will commence the implementation of the Action Plan. Together, the WCAP and the RDRAP will contribute to the shared objective of improving safety for all.

6.22. In the Parking Investment Plan for 2022/23 Cabinet report, clarity is provided on how the Council intends reviewing the current provision of permitted footway parking at 101 locations across Haringey. Given that 'pavement users' rank highest in the road user hierarchy in paragraph 6.5, the review will consider what proportion of the footway where footway parking currently exists will be reassigned to pavement users, thereby encouraging walking as the healthiest and most environmentally friendly mode of travel. This review aligns with the last policy area identified in paragraph 6.6 above, in terms of 're-allocating road space to enable sustainable growth and to make walking and cycling safer'

Funding

6.23. Haringey's funding to support new cycling and walking infrastructure and programmes is largely from TfL. In a 'normal' year, Haringey receives £1.9m LIP funding from TfL to deliver transport schemes. However, in June 2020, TfL suspended this funding stream because of financial pressures from Covid-19. The reinstatement of this funding stream is dependent on TfL reaching a long-term funding agreement with Government and despite TfL efforts to date in this regard there is yet to be any substantive agreement and rather TfL has had to rely on short-term 'interim' funding agreements in enable to continue essential service delivery. The next Government funding agreement for TfL is expected in February 2022.

6.24. TfL funding for boroughs to deliver transport schemes is currently uncertain, however, having an adopted WCAP in place will provide a clear strategic basis for bidding for future funding will enable the Council to respond quickly and comprehensively when it becomes available.

6.25. The Council continues to explore opportunities for more funding to support new cycling and walking infrastructure from a range of sources and will submit bids when they are identified. We do not commit to the delivery of projects in the WCAP delivery plan beyond those currently funded. The WCAP delivery plan is written to reflect the constrained and competitive nature of TfL funding. The

WCAP includes all the programmes funded previously, and our aspirations for future work, in preparation for future funding.

6.26. A £5.1m Capital Programme fund to deliver a range of transport improvements in the borough was agreed by Cabinet on 8 December 2020 and was subsequently approved by Cabinet and Council in 2021. This funding using Strategic Community Infrastructure Levy (SCIL) will be used to help deliver the WCAP and some unfunded projects in the WCAP delivery plan.

6.27. In addition, the contribution of wider Council investment to meeting the aims of the WCAP is noted such as that identified within the Highways and Street Lighting Investment Plan. This includes investment of £4.769m in improvements to Haringey's roads and footways and an additional allocation of £3.985m to be used for road resurfacing, bridges, illuminated and non-illuminated street furniture and trees. In addition, there is £475k planned investment in parks and greenspaces across the borough for two consecutive years (commencing in 2022/23) for lighting column replacement, conversion to LED lighting and inclusion in the highways lighting central management system. This investment will collectively help address concerns that residents (particularly women) feel unsafe at night which can be a key barrier to their active travel.

Low Traffic Neighbourhoods (LTNs)

6.28. Low Traffic Neighbourhoods (LTNs) are area-based traffic management schemes that aim to reduce or remove non-residential motor traffic from residential areas. LTNs are introduced to support walking and cycling and to bring a wide range of benefits for everyone especially those who live, work or study in them.

6.29. In December 2021 Cabinet agreed to progress implementation of 3 LTNs in Bounds Green, Bruce Grove/Tottenham and St Ann's. The WCAP references these and also sets out a strategic borough-wide LTN vision including criteria for how we define and determine locations for LTN areas and provides guidance on planning LTN areas and suggested design features. This will help guide the engagement and implementation of further future LTNs, although is indicative only as a strategic plan rather than a precise blueprint.

7. Contribution to strategic outcomes

7.1. The adoption of the WCAP will primarily support the 'Place' Priority of the Borough Plan 2019-23 which includes specific objectives to: increase the levels of physical activity across the borough (objective 9b); improve air quality, especially around schools (objective 9c); reduce CO2 by 40% before 2020 and begin the journey to reduce to zero by 2050 (objective 9d); provide safe and accessible roads, pavements and other public spaces for everyone, especially vulnerable users (objective 10a); provide accessible, quality spaces for people to come together, especially for young people and children (objective 11a); and improve connectivity (objective 11c). The WCAP will contribute to these objectives in a variety of ways but principally by bringing about a shift from car use to walking and cycling by promoting the concept of 'active travel'.

7.2. The adoption of the WCAP will discharge a commitment in the Borough Plan Place Priority Year 2 Delivery Plan to carry out public consultation on and adopt the WCAP.

7.3. In addition, it will support the 'People' Priority and the 'Economy' Priority. The People Priority includes objective 4c) children and young people will be physically and mentally healthy and well and objective 7c) adults will feel physically and mentally healthy and well. The WCAP will do this by making Haringey a healthier place to live, work and participate through enabling more walking and cycling across the borough. The Economy Priority includes objective 13e) support our town centres and high streets to thrive in a changeable economy and objective 13d) bring the physical and social infrastructure that growing communities need. The WCAP will do this by making our high streets more cycling and pedestrian friendly and improving walking and cycling to our town centres which will benefit businesses and help restore vitality to local high streets and town centres.

7.4. Adopting the WCAP will support the delivery of key Council strategies including the Transport Strategy, Climate Change Action Plan, Air Quality Action Plan, School Streets Plan and Good Economy Recovery Plan.

8. Statutory Officers' comments (Director of Finance [including procurement], Head of Legal and Governance, Equalities)

Finance

8.1. This report recommends the adoption of the Walking and Cycling Action Plan (WCAP) Any projects undertaken to deliver the WCAP will have to be identified before they commence.

Strategic Procurement

8.2. N/A

Legal

8.3. The Head of Legal and Governance has been consulted on the preparation of this report and comments as follows.

8.4. The Walking and Cycling Action Plan is a non-statutory document that sets out the Council's policy and delivery plan to increase walking and cycling in the borough in line with the adopted Transport Strategy.

8.5. Regard has been had to Government and Transport for London guidance when preparing the Walking and Cycling Action Plan and the Plan if approved will help the Council achieve the Mayor of London's walking and cycling targets in his transport strategy for London.

8.6. It is clear from section 6 above that adequate time was given for intelligent consideration of the draft Walking and Cycling Action Plan and that the responses received in respect of the Plan were taken into account in finalising the Walking and Cycling Action Plan set out at Appendix D.

8.7. The Walking and Cycling Action Plan is not a policy framework development plan document and so the approval of the Plan is a decision that can be taken by Cabinet in accordance with the Council's Constitution.

Equality

8.8. 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.

8.9. 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.

8.10. The proposed decision is to adopt the Haringey Walking and Cycling Action Plan. The Action Plan is designed to deliver the council's adopted Transport Strategy, which was subject to an Equalities Impact Assessment, which is available at this link: www.haringey.gov.uk/sites/haringeygovuk/files/transport_strategy_eqia_2018.pdf and the WCAP EqIA can be found here: https://www.minutes.haringey.gov.uk/documents/s121169/Appendix%204%20WCAP%20EQIA.pdf

8.11. The Walking and Cycling Action Plan takes into consideration the needs of residents who share the protected characteristics and includes measures to deliver improved outcomes for children and young people, people with disabilities, and people living in relatively deprived neighbourhoods. The full range of anticipated outcomes is set out in an Equalities Impact Assessment.

9. Use of Appendices

Appendix A: Strategic context
Appendix B: Consultation report
Appendix C: Consultation response
Appendix D: Walking and Cycling Action Plan
Appendix E: Equalities Impact Assessment

10. Local Government (Access to Information) Act 1985

Draft Walking and Cycling Action Plan - Cabinet report and appendices, 9 March 2021: https://www.minutes.haringey.gov.uk/ieListDocuments.aspx?CId=118&MId=9468&Ver=4 (item 433)

Haringey Borough Plan 2019-2023: https://www.haringey.gov.uk/local-democracy/policies-and-strategies/borough-plan

Haringey Transport Strategy 2018 and Haringey Transport Strategy Equalities Impact Assessment (EqIA): https://www.haringey.gov.uk/parking-roads-and-travel/travel/haringeys-transport-strategy

Strategic Context

The **Borough Plan**, adopted in 2018, sets out the Council's priorities for the borough. The Place Priority is for Haringey to be 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. Specific objectives under the Place Priority include to:

- increase the levels of physical activity across the borough
- improve air quality, especially around schools
- reduce CO2 by 40% before 2020 and begin the journey to reduce to zero by 2050
- provide safe and accessible roads, pavements and other public spaces for everyone, especially vulnerable users
- improve connectivity around the borough especially for pedestrians and cyclists

The Borough Plan places a significant focus on making Haringey a better and more equal borough with the objective to narrow the gap in outcomes for different residents and tackle the barriers that disproportionately affect the independence, health and wellbeing of some residents.

One thing which is central to the success and prosperity of the borough's residents and local businesses is Transport. Everyone, whether a pedestrian, cyclist, bus passenger, motorcyclist, motorist, or rail user engages with Haringey's transport infrastructure every day. Making the best use of our existing assets and spending money wisely to improve sustainability, safety, ease of movement and usage is one of the important roles for the Council.

In 2018 the council adopted its first **Transport Strategy** which contains the vision: "to deliver a transport system that matches our growth and prosperity ambitions, whilst also improving our environment, providing accessible choices and making walking, cycling and the use of public transport a first choice for all." This vision will be achieved through four outcomes:

- A public transport network that is better connected, has greater capacity and is more accessible, supporting our growth ambitions
- Active travel the default choice, with more people choosing to travel by walking or cycling
- An improved air quality and a reduction in carbon emissions from transport
- A well maintained road network that is less congested and safer

The Council's Transport Strategy builds on the **Mayor's Transport Strategy** (2018) which seeks to create a city for all Londoners setting out the Mayor's plans to transform London's streets, improve public transport and create opportunities or new homes and jobs. To achieve this, the Mayor wants to encourage more people to walk, cycle and

use public transport with a bold aim for 80% of all trips in London to be made on foot, by cycle or using public transport by 2041.

In March 2019, the council declared a **Climate Emergency**. In doing so, the Council committed to developing an action plan to decarbonise the borough by the earliest date that was both ambitious but achievable. In 2021 the council adopted its **Climate Change Action Plan** which sets out a roadmap for how the borough will become net zero-carbon by 2041. One of the six areas of focus identified in the Action Plan for reducing carbon emissions is transport. It notes that transport is the third largest source of emissions in the borough and contains an objective to reduce emissions related to road transportation by 50% by 2025, by growing public and active travel options, low-carbon transport options and infrastructure. It notes that private transport, in particular, is associated with poor air quality, noise, social isolation, and health issues within the borough.

In November 2019 the Council approved an **Air Quality Action Plan** outlining the actions the Council will take to improve air quality in the borough to 2024. It highlights that air pollution is a major issue with serious impacts on the health of the borough's communities. It notes air pollution is associated with several adverse health impacts including 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 often less affluent areas. The Action Plan notes road transport is the main source of air pollution in London and seeks to incentivise a change to cleaner transport including walking and cycling.

In August 2020 the Council approved a **Good Economy Recovery Plan** setting out a plan to help address the immense economic challenges presented by the covid-19 pandemic. The Plan sets out four top priorities as follows:

- Re-open and support our high streets and town centres
- Support businesses through recovery and into renewal
- Support residents into work and training
- Secure social and economic value through investment in our neighbourhoods and communities

The first priority seeks to work with businesses and stakeholders to safely re-open our high streets across the borough - building resident confidence and recognising the evolving usage of our town centres and public spaces to create more flexible, prosperous and inviting places. The last priority is focused on investment in our neighbourhoods and communities including investing in green & public infrastructure to support healthier, greener lives.

In November 2020 the Council adopted a **School Streets Plan** setting out how it will deliver School Street schemes across the borough. A School Street is where the street outside of the entrance to a school is closed to motor vehicles at the start and the end of the school day, creating safe public space for safer walking and cycling.

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Draft Walking and Cycling Action Plan Consultation Report.

Prepared for Haringey Council.

February 2022.

e.c.f.

Haringey LONDON

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Executive Summary

- London Borough of Haringey Council (LB Haringey) undertook a 10-week non-statutory consultation on the draft Walking and Action Cycling Plan (WCAP) to understand and gather feedback on the draft plans, future vision, and delivery plan. The draft WCAP consultation was designed to present the plans to the public and stakeholders and give them a voice in shaping the future of active travel in the Borough. This report summarises the engagement work that was undertaken on the proposals.
- This report focuses on the outcomes of the public consultation process that ran from 08 November 2021 – 10 January 2022 and consisted of a range of digital and physical events throughout the engagement period. Engagement activities included a dedicated engagement platform on Commonplace, which included all the latest and relevant information, four pop-up events across the borough and two digital public meetings. Physical copies of the consultation documents were made available at local Haringey libraries.
- Engage Communicate Facilitate (ECF), an independent specialist community engagement consultancy, were instructed by Haringey Council to manage the engagement and consultation process. The engagement process was designed to ensure the widest range of voices in the community are able to provide their ideas and views on the draft WCAP.
- Based on the feedback received, ECF have identified the following key observations for consideration.
- The analysis has found strong general support for the draft WCAP proposals, and the majority of participants stated they welcome better and further opportunity to walk and cycle in the Borough.
- However, the analysis showed there were areas of concern for residents which included:
    - Some were concerned the Low Traffic Neighbourhood (LTN) policy would increase congestion and pollution in the Borough.
    - Strong views were expressed among participants that the plans were lacking evidence and detail to support the elderly, disabled and those more reliant on motor vehicles.
    - Requests for public transport to be given greater priority in the draft WCAP.



INTRODUCTION

1. Introduction

1.1. This consultation report provides an overview of the results from the public consultation that took place on the draft Walking and Cycling Action plan (WCAP).

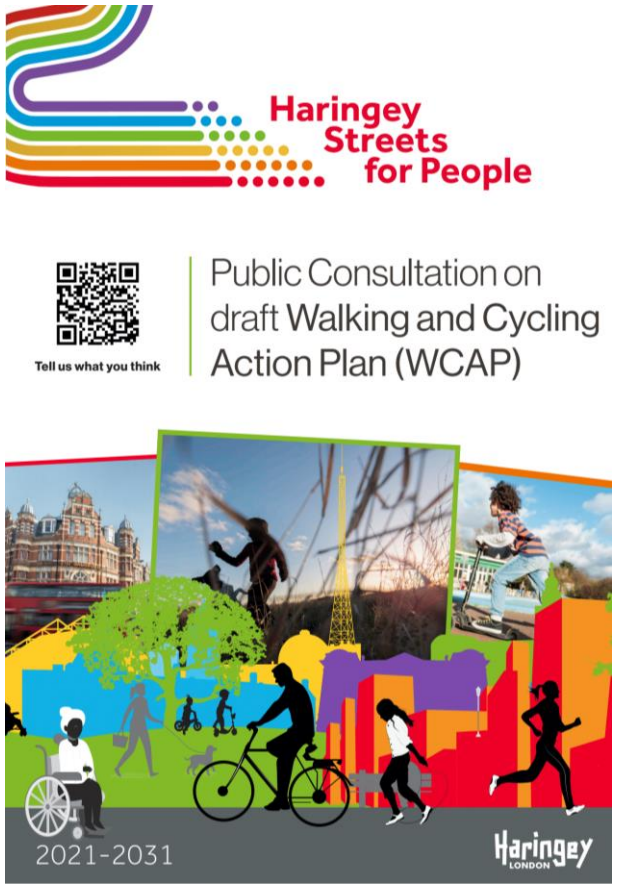
1.2. The draft WCAP sets out how the Council will deliver its aspirations outlined in the 2018 Mayor of London's Transport strategy, the 2018 Haringey Transport Strategy and the government's Cycling and Walking Plan. The draft WCAP included a series of visions, proposals and a delivery plan to improve walking and cycling in the Borough.

1.3. The purpose of the consultation was to inform residents, community groups and businesses on the development of the draft WCAP, and to increase people's understanding of the case for more active travel, LTNs, improved walking and cycling routes in Haringey, including the benefits for the community, businesses and the environment.

1.4. The consultation ran for a 10-week period and included a series of digital and physical events that aimed to reach a broad range of residents, the public and stakeholders in Haringey.

1.5 As part of the consultation process, the consultation activities included: a dedicated engagement platform (Commonplace), community pop-up events, digital public meetings, social media snap polling, bespoke accessible surveys and political engagement. Alongside the plans, the delivery plan was presented and feedback was invited from all consultees.

1.6 This consultation report will help inform the decision taken by the Council regarding the amendment of the policies outlined and walking and cycling plans identified for implementation.



METHODOLOGY

2. Methodology

2.1. Working closely with LB Haringey officers, ECF produced a Communications and Engagement Plan to outline the methodology to support the draft WCAP consultation process.

2.2. The methodology was designed to reach a wide range of public and stakeholders, including those with protected characteristics (as defined by the 2010 Equality Act), and to encourage them to participate in the consultation process. The plan also included measures to ensure those who are typically seldom heard in these processes were able to provide their feedback.

2.3. Given the context of evolving COVID-19 restrictions, the methodology included a range of digital and physical events to support an inclusive and fair engagement process, in which people could choose how they participate.

Commonplace

2.4. At the heart of the methodology was the establishment of an Engagement Hub through which people would be able to provide their views. As such, the draft WCAP was published on a Commonplace website (haringeywalkingcycling.commonplace.is), alongside all key supporting documentation and an interactive map of the borough. The Commonplace website was also supported by a page on LB Haringey's website (https://www.haringey.gov.uk/parking-roads-and-travel/travel/haringeys-transport-strategy/draftwcp).

2.5. In addition to the information published, participants had three separate activities they could participate in, to provide their views. These varied in length to ensure time pressed individuals were able to participate. The three activities were:

- A survey on the draft WCAP Vision and Policies. This survey was designed by LB Haringey officers and asked 34 questions, which were a mix of qualitative and the quantitative questions to assess support for the vision and policies and allow for suggestions for improvement to be made.
- A survey on the WCAP Delivery Plan. This survey was designed by LB Haringey officers and asked six quantitative questions and one qualitative question, specifically on the Delivery Plan
- A Delivery Plan Interactive Map which allowed individuals to pinpoint issues and interventions they would like to see across the Borough. Of the three activities, this was the quickest for individuals to complete.

2.6. Paper copies of the surveys were made available at local libraries across the Borough to ensure people who were not online could participate in the process. A translation information sheet was also made available outlining how to request the documents in different languages.

2.7. The Commonplace platform provided a series of adjustable settings that allowed individuals with visual or cognitive disabilities to engage with the information. Residents were also able to request materials in an Easy Read format, or in another language.

2. Methodology

Public Meetings and Webinars

2.8. In addition to the publication of the Engagement Hub, a series of activities were held to garner feedback from residents and stakeholder groups. Drop-in sessions were held in physical locations to provide a means through which people could interact with the project team, and the Webinars were held on Microsoft Teams to provide a virtual environment for interaction.

2.9. The following pop-up sessions were held:

- Saturday 20th November 10am – 2pm Marcus Garvey Library, 1 Philip Lane, London, N15 4JA
- Saturday 27th November 10am – 2pm Alexandra Park Library, Alexandra Park Road, London, N22 7UJ
- Saturday 4th December 10am - 2pm Hornsey Library, Haringey Park, London N8 9JA
- Saturday 11th December 10am – 2pm St Ann's Library, Cissbury Road, London, N15 5PU

2.10. At these sessions, members of the project team were present to encourage individuals to participate in the consultation process. This was achieved through the distribution of leaflets with QR codes directing people to the Commonplace site. Information boards were also displayed, and passers-by were able to leave their suggestions.

2.11. Two webinar sessions were held as well, and took place at the following times:

- Wednesday 15 December 2021, 6.00pm – 8.00pm
- Thursday 6 January 2022, 6.00pm – 8.00pm

2.12. Each session comprised a presentation on the Vision, Policies and Delivery Plan as well as a justification for the proposed measures followed by an interactive question and answer session, with individuals able to ask their question verbally or in writing.

Other Feedback Channels

2.13. A short quantitative survey was produced that asked residents about their existing travel habits, barriers to walking and cycling, and how they would like to travel in the future. This survey was advertised through an online digital marketing campaign which saw advertising feature on various social media channels, and websites, including several foreign language news publications that residents in Haringey regularly use. The digital marketing campaign also directed residents to the Engagement Hub.

2.13. Individuals were also able to email the Transport Planning team at LB Haringey to provide their feedback.

2.14. Stakeholder groups were also written to, a list is contained in the appendices, and asked to provide their view on the draft WCAP, and also inform their membership that the consultation was taking place.

Summary

2.15. Taken together, residents and stakeholder groups were given several means through which to participate in the consultation process. The summary that follows covers each of the channels outlined above.

FEEDBACK AND ANALYSIS

3.0. Participants

3.1. This section of the report covers participation rates in the consultation process.

3.2. Demographic data was collected through the Commonplace platform, the paper surveys and through the snap survey. That data is summarised here.

Overall participation

3.3. There was the following level of participation across each of the engagement channels:

- 533 individuals responded to the Vision and Policies survey
- 253 individuals responded to the Delivery Plan survey.
- 412 individuals responded to the Delivery Plan map.
- 706 individuals responded through the snap survey.
- 90 emails were received from local residents.
- 13 responses were received from stakeholder groups.

3.4. It is estimated a total of 1,500 – 2,000 individuals have participated in the consultation on the draft WCAP.

Overall engagement

3.5. The draft WCAP Commonplace website was visited by 5,964 individuals and the draft WCAP Commonplace map website was visited by 1,840 individuals. In total, there were over 7,000 contributions made through the Commonplace, including survey responses, pins on maps and individuals agreeing with the comments others had made.

3.6. Throughout the process a digital advertising campaign was undertaken to drive participation. Adverts were shown on various different platforms, including Facebook and Snapchat, generating the following exposure:

- 1.4m impressions
- Interactions from 8,873 individuals and a click through rate of 0.63%
- A maximum reach of 408,965

3.7. Adverts were published on Polish, Albanian, Turkish and other foreign language websites, thereby broadening the reach of the consultation process.

3.8. In addition, approximately 110 individuals participated across the two webinar sessions, and it is estimated the team spoke to between 600-800 individuals across the four pop-up sessions.

4.0. Participant Demographics

4.1. This section breaks down the demographics for each of the activities through which demographic data was collected.

Vision and Policies and Delivery Plan Survey

4.2. Participants were asked to provide their age, ethnicity, gender, as well as whether they identified as having a long-term physical or mental condition or illness. The data for participants in the Vision and Policies Survey and for the Delivery Plan Survey have been consolidated as the table was hosted on the same platform. Most respondents chose not to answer any questions.

4.3. Most individuals who participated in the process identified as "White" with only 16% identifying in a non-white ethnic group.

4.4. 17% of individuals who participated identified as having a long-term physical or mental health condition or illness lasting longer than 12 months. Of those, 33% identified as having a mobility issue.

Ethnicity	Count	%
White	215	83.66
Mixed/Multiple ethnic groups	8	3.11
Black/African/Caribbean/Black British	5	1.95
I prefer not to say	9	3.50
Other	12	4.67
Asian/Asian British	8	3.11
Total	257	100.00

Figure 1: Please tick the box that best describes your ethnicity

Disability	Count	%
No	203	79.61
Yes	44	17.25
I prefer not to say	8	3.14
Total	255	100.00

Figure 2: Do you have any long-term physical or mental health conditions or illnesses lasting or expected to last 12 months or more?

Type of disability	Count	%
I prefer not to say	4	8.70
Mobility	15	32.61
Other	9	19.57
Hearing	2	4.35
Respiratory	5	10.87
Mental Health	7	15.22
Sight	4	8.70
Total	46	100.00

Figure 3: If yes to the above question, please give details of the nature of this:

4.0. Participant Demographics

4.5. Most participants (53%) identified as male.

4.6. There was an even age-group spread in terms of the individuals who provided an answer to the surveys. 24% were aged between 45-54, and 14% are under the age of 34.

Delivery Plan Map

4.7. The same questions were asked of individuals who provided a suggestion through the Delivery Plan Map exercise, and the following was true of those who participated:

- 76% individuals identified as White.
- 20% identified as having a long-term physical or mental health condition or illness, with 33% identified as "Other" when asked to state the type of condition or illness.
- 58% identified as male when asked their gender.
- 32% of individuals identified as between the age of 35-44.

Snap Survey

4.8. Individuals who completed the Snap Survey were also asked to provide the same information, and did so at a higher rate than through the Commonplace website. The following data was provided by those who participated:

4.8.1. 51% of individuals who responded were under the age of 44.

4.8.2. 74% identified as White.

4.8.3. 18% identified as having a long-term physical or mental health condition or illness. A range of conditions were stated when individuals were asked to state what their condition or illness is.

4.8.4. 59% identified as female when asked their gender, and 1% identified as non-binary.

Gender	Count	%
Male	253	53.38
Female	192	40.51
Non-binary	1	0.21
Prefer not to say	28	5.91
Total	474	100.00

Figure 4: Please tick the box that best describes your gender

Age	Count	%
16 – 24	7	1.51
25 – 34	58	12.53
35 – 44	99	21.38
45 – 54	111	23.97
55 – 64	78	16.85
65 – 74	64	13.82
75+	31	6.70
I prefer not to say	15	3.24
Total	463	100.00

Figure 5: What age group are you?

5.0 Feedback and Analysis

Vision & Policies Questionnaire

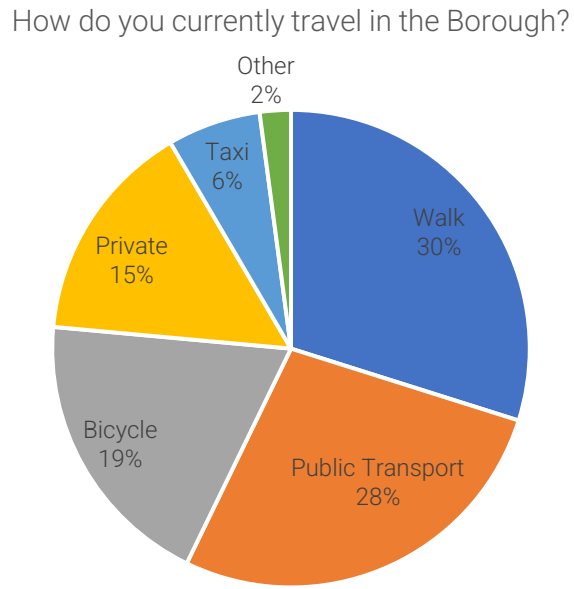
As part of our analysis, we have identified seven key reoccurring themes in respondent feedback:

1. Supportive of the vision
2. Improving accessibility
3. Walkable places
4. Cyclable places
5. Investing in street space
6. Tackle the climate emergency
7. Greener school travel

These seven identified key themes have been in the analysis as a means of measuring participant agreement to the proposed plans.

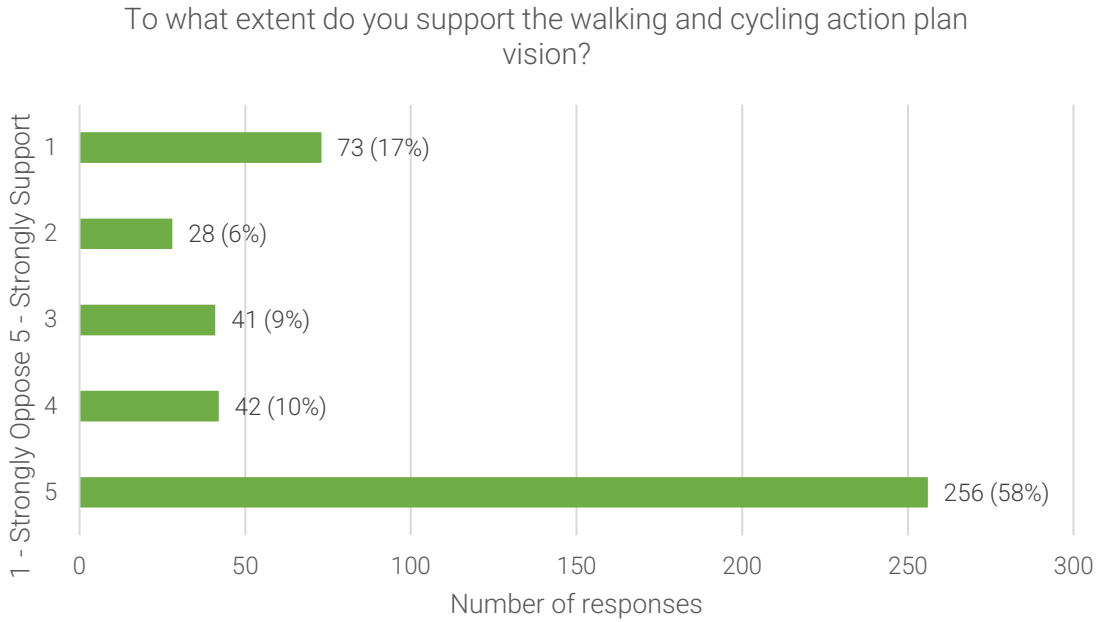
5.1.1 In the Vision & Policies consultation survey, 17 quantitative and 17 qualitative questions were asked to test the sentiment towards the draft Walking and Cycling Action Plan and the proposals. The quantitative questions were tested through a five-point Likert scale in which the higher scores indicated more support to the proposition. Participants did not have to submit an answer to each individual question and could submit their survey without answering all questions. The qualitative questions included a free text box and provided participants with the opportunity to provide their feedback. This section analyses the responses received.

5.1.2 The first question asked participants to select the option or options that fit with how they currently travel in the Borough. Responses showed that walking (30%) was the most common mode of transport chosen by residents, closely followed by use of public transport (28%), and then cycling (19%). Only 15% of respondents said they currently use private vehicles to travel in the Borough.



5.0. Feedback and Analysis
Section 1 – Walking and Cycling Plan Vision

5.1.3 Of the 440 responses that were submitted to this question, the majority of participants (58%) picked the most positive option. Comparatively, (17%) chose the most negative option for this question. This indicates strong general support for the draft WCAP vision.



5.0. Feedback and Analysis
Section 2 – The Walking and Cycling Action Plan Policies

5.1.4 Section 2 asked participants to what extent they supported the draft WCAP policies, and gave participants the opportunity to suggest what else should additionally be included in each of the five policies.

- **Policy 1- Increasing Active Travel**

5.1.5 58% of respondents picked the most positive option when answering the question, "*To what extent do you support the increasing active travel policy?",* 14% opting for the most negative option, indicating strong general support for proposals to increase active travel in the Borough.

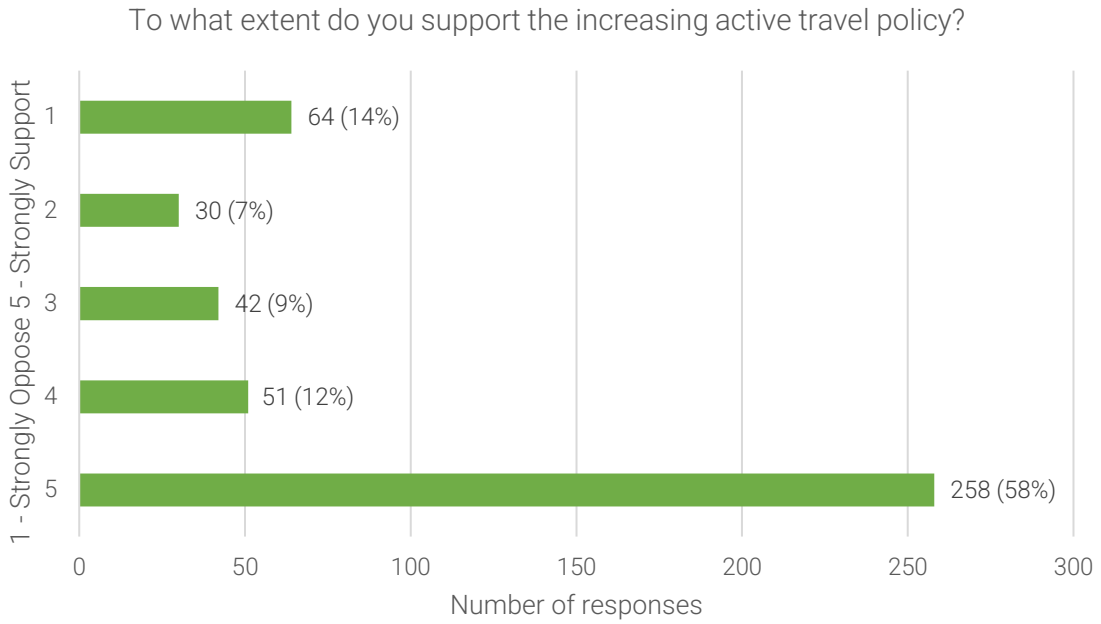
"3b. What else should be included in Policy 1 - Increasing Active Travel?"

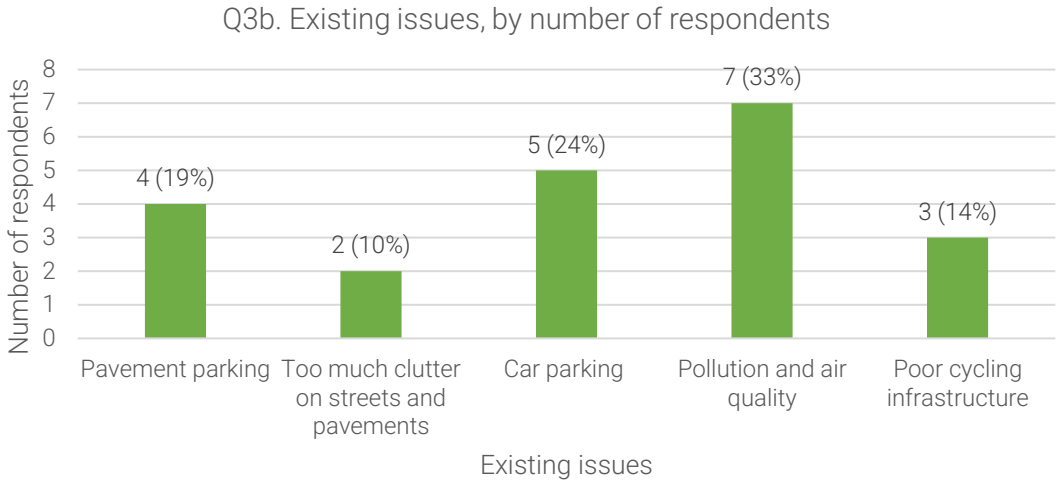
5.1.6 Of the seven recurring themes in this consultation, the most common themes to be referred to in this question were the need to improve accessibility and public transport, and the need to invest in street space (cleanliness, safety, street infrastructure). These interests were also reflected in the nature of the suggestions and criticisms which featured in the written responses to this question.

Existing issues

5.1.7 The main existing issues raised in the responses to this question were:

- High levels of pollution and low air quality in the area
- High volume of car traffic and cars parked on streets
- Poor maintenance and quality of street space and cycle infrastructure.





5.0. Feedback and Analysis
Section 2 – The Walking and Cycling Action Plan Policies

Suggestions

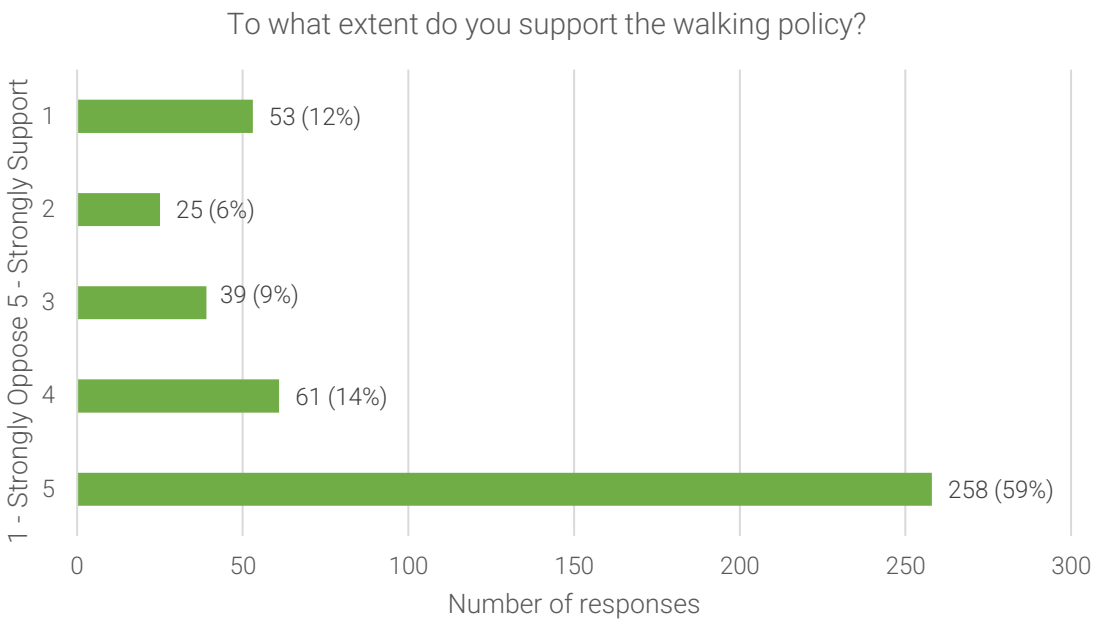
5.1.8 The most common suggestion mentioned was for Policy 1 to develop more focus on the important role of public transport in facilitating active travel. The following comments capture this:

- *"No mention of public transport? Efficient and reliable public transport encourages people out of their cars and thereby increases walking/active travel."*
- *"A recognition of the role of public transport in encouraging active travel"*
- *"An assessment of public transport, particularly bus routes, and congestion that makes travel west east difficult."*

5.1.9 Other common suggestions were to improve cycling infrastructure and cycle parking to incentivise active travel, and that more consideration needs to be given to disabled and those with reduced mobility. Examples of respondent feedback are below:

- *"More secure cycle parking (replacing car spaces) outside leisure and retail facilities. Incentives for families to ditch the car-based school run where possible".*
- *"Policy as it stands at the moment is extremely alienating for disabled and chronically ill people."*

- **Policy 2 – Walking**



5.1.10 436 participants took part in this question, with 73% of those that said they either '*Strongly Support*' or '*Support*' the draft WCAP policy for walking indicating strong support for the policy.

5.0. Feedback and Analysis
Section 2 – The Walking and Cycling Action Plan Policies

"3d. What else should be included in Policy 2 – Walking?"

5.1.11 Of the 7 recurring themes, the most common to be referred to in this question were need to invest in street space (cleanliness, safety, street infrastructure) and the desire for walkable places.

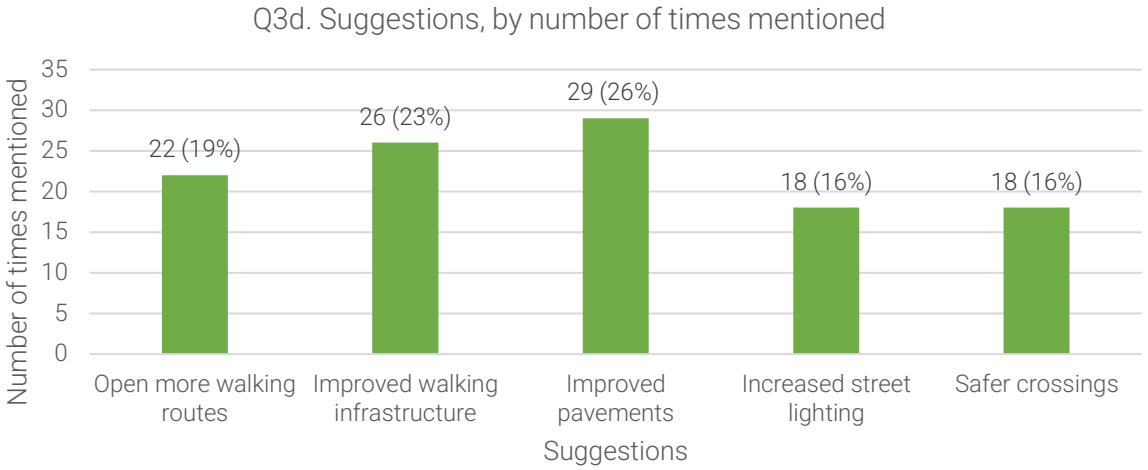
Existing issues

5.1.12 The two most frequent issues to be mentioned in the responses to this question were regarding the high rates of pollution and concerns for safety.

Suggestions

5.1.13 The most common suggestion that was reported in participant responses to improve Policy 2 was the need to prioritise widening and improving pavements for pedestrians. The following comments represent the discussed views:

- *"Wider pavements on high streets, more division from high-speed traffic. Less litter and mess."*
- *"Improving the safety of pavements (some are in a bad state) and cleanliness of the streets would make it more pleasant to walk around. The amount of rubbish and dog mess is still very high."*



Another key suggestion which was expressed by participants was the need for more planned and well-lit walking routes in the local area. The following comments are examples of these suggestions:

- *"Increased street lighting. Better pavements. Cleaner streets."*
- *"For people to want to walk, it needs to be pleasant to walk. That means paths should be at least some distance from busy, noisy, pollutant-heavy roads. I would happily walk down Turnpike Lane more, for instance, but it is constantly full of traffic."*

Roads and places

Turnpike Lane, Green Lanes, and Seven Sisters Road were frequently referenced by participants in their responses to this question.

5.0. Feedback and Analysis
Section 2 – The Walking and Cycling Action Plan Policies

- **Policy 3 – Cycling**

5.1.7 The results to the question that asked participants to rank their support for the draft WCAP cycling policy were similar to the walking policy. Of the total 393 participants that took part in this question, 63% of participants opted for the most positive option. 70 (18%) participants chose the most negative option, which is slightly greater than the walking policy findings.

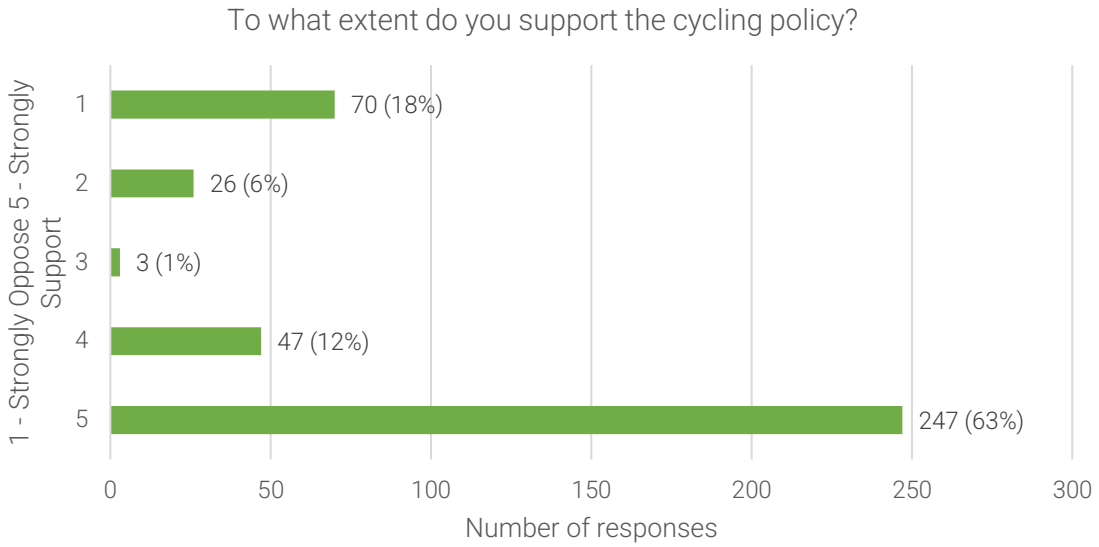
3f. What else should be included in Policy 3 - Cycling?

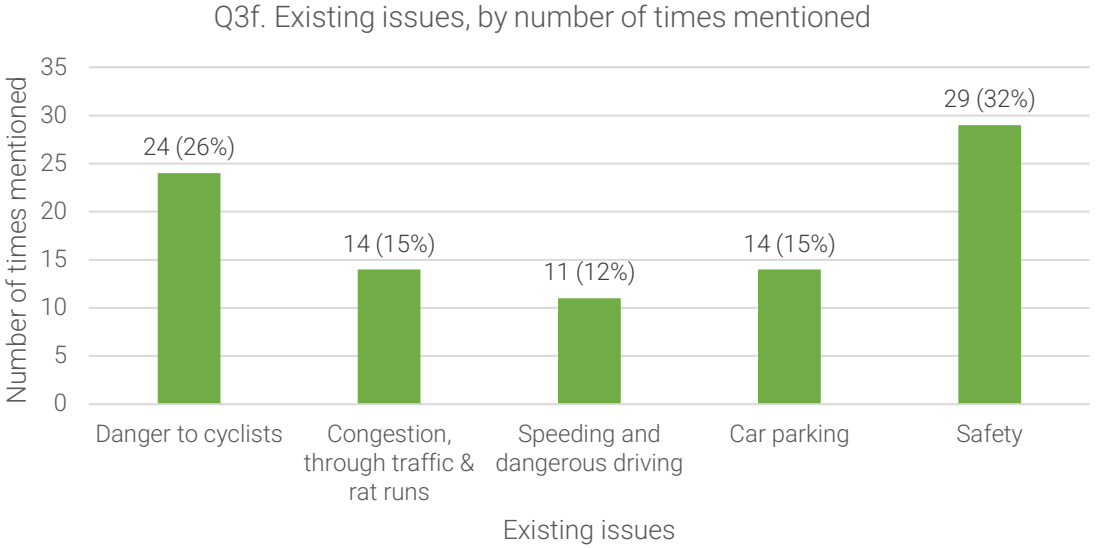
5.1.19. In a subsequent qualitative question, respondents were asked whether anything else should additionally be included in Policy 3. Out of the 393 respondents which took answered Question 3e, 260 (66%) gave a written response. General opinion on Policy 2 in the written responses were largely neutral.

5.1.20. Of the seven recurring themes, Cyclable places was the most significant theme (mentioned 201 times) to emerge from the data on this question.

Existing issues

5.1.21. The graph to the right demonstrate the most common issues mentioned question on Policy 3 were regarding the lack of safety for cyclist, concerns for increased traffic congestion, dangerous driving and speeding that takes place in the Borough.





5.0. Feedback and Analysis
Section 2 – The Walking and Cycling Action Plan Policies

Suggestions

5.1.22. When respondents were asked what else should be included in Policy 3 there were a variety of suggestions. The most frequent suggestions in this question called for more cycling infrastructure, cycle parking, and segregated cycle paths.

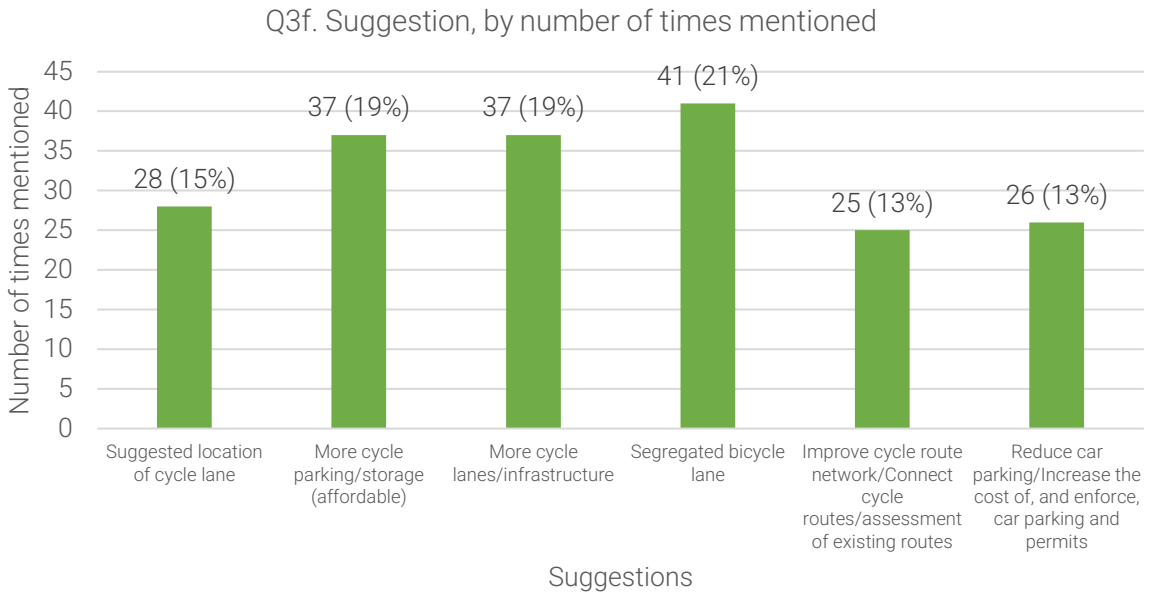
Concerns and criticisms

5.1.23. The most common future concerns and criticisms emerged from the consultation data on Policy 3 included statements emphasising that not all can use a bicycle as well as concerns from respondents that the plans unfairly prioritised cycling over other modes of transport.

Road and places

5.1.24. Green Lanes, Muswell Hill and Finsbury Park were identified as potential locations for improvements to cycling infrastructure and cycle parking. See the following comments for examples:

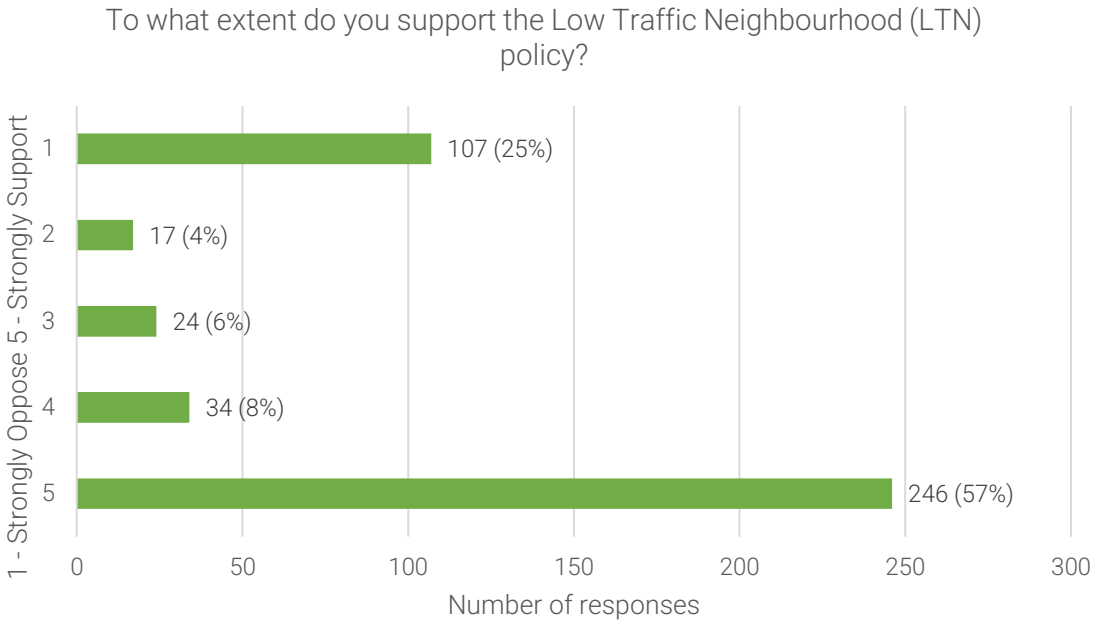
- *"It is essential that there is a bike lane on Green Lanes between Turnpike Lane and Finsbury Park".*
- *"Introduce cycle only tracks throughout the borough, and build elevated radial routes into traffic nodes such as Finsbury Park, Muswell hill, Wood Green etc."*



5.0. Feedback and Analysis
Section 2 – The Walking and Cycling Action Plan Policies

- **Policy 4 – Low Traffic Neighbourhoods**

5.1.25. Responses to the policies continued to be supportive, as 57% of participants chose one of the two positive options for the question, *'To what extent do you support the Low Traffic Neighbourhood (LTN) policy?'*. However, the proportion of negative response to Policy 4 increased in comparison to earlier questions, with 25% of respondents that opted for the most negative option. These findings indicate a more polarised participant opinion, but an overall general support for LTN policy.



3h. What else should be included in Policy 4 - Low Traffic Neighbourhoods?

5.1.26. In the subsequent qualitative question, respondents were asked whether anything else should be additionally included in Policy 4. Out of the 428 respondents which took part in the previous question (question 3g), 236 (55%) gave a written response. Unlike the previous written responses to the policies, analysis on the feedback received to this question was more critical.

5.1.27. Of the seven recurring themes in our analysis, the most common theme mentioned in this question is that respondents were supportive of the vision. Similarly, the most common suggestion found in this question stated participants would like more LTNs to be established in their areas. The critical responses are best represented in our analysis of concerns and criticisms that we will now turn to.

5.0. Feedback and Analysis
Section 2 – The Walking and Cycling Action Plan Policies

Concerns and criticisms

5.1.28. The primary concern found in respondent feedback was LTN's would cause more pollution and residential congestion, with a total of 50 mentions (21%). The following responses represent these concerns:

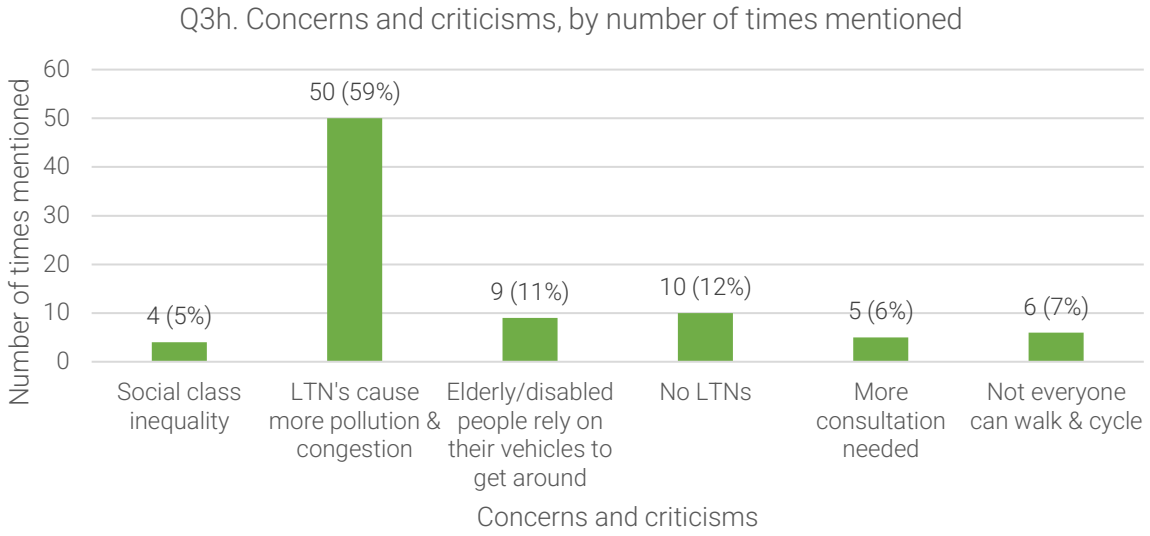
- *"This will just create very poor air quality in different places. It will adversely affect businesses".*
- *"Experiment failed last year and created misery for residents and businesses. Pollution everywhere. Keep things as they are".*

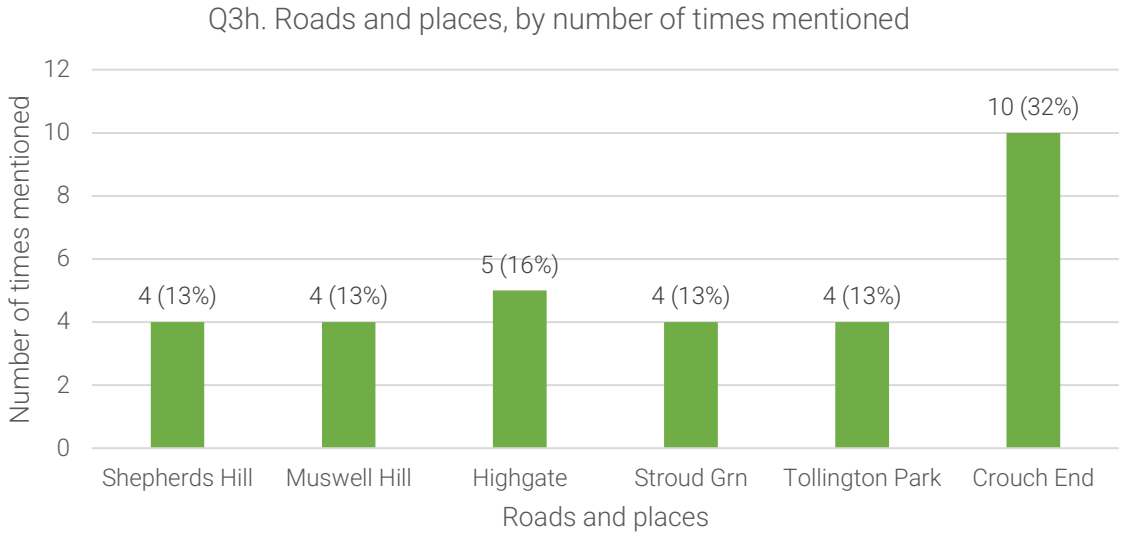
Existing issues

5.1.29. Traffic, congestion, and pollution were the most common existing issues that were discussed in written responses to this question.

Roads and places

5.1.30. Amongst positive responses, Crouch End is a place of interest that is frequently recommended as a site for a potential LTN.





5.0. Feedback and Analysis
Section 2 – The Walking and Cycling Action Plan Policies

- **Policy 5 – Reallocating Road space to enable sustainable growth and to make walking and cycling safer**

5.1.9 Similarly, 59% of participants chose the most positive option of the reallocation of road space, however 19% remain opposed to the policy of reallocating road space.

3j. What else should be included in Policy 5 - reallocation of road space?

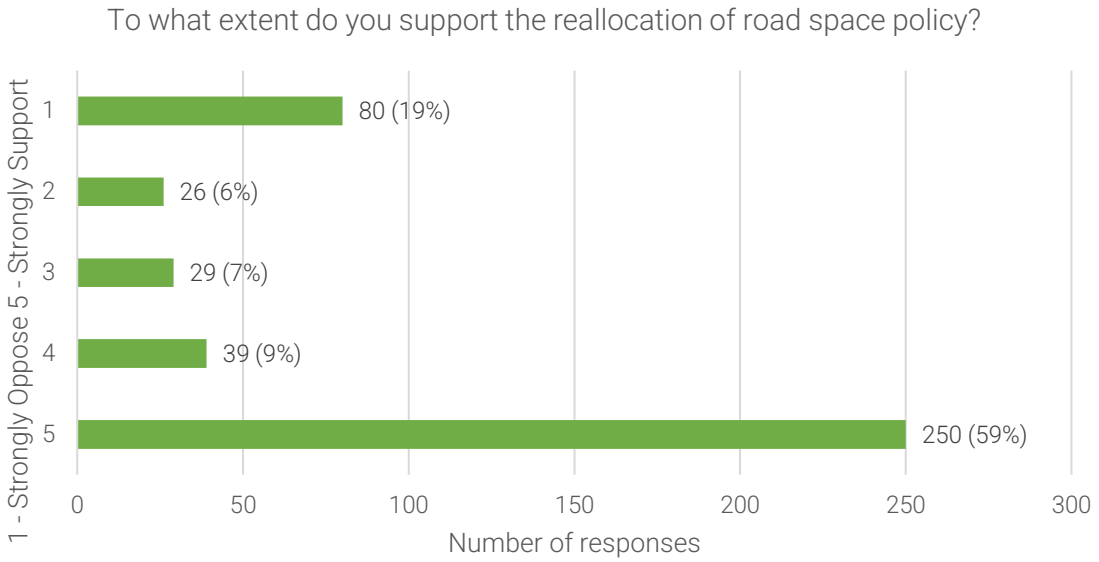
5.1.32. In a subsequent qualitative question, respondents were asked whether anything else should additionally be included in Policy 5. Out of the 424 respondents who answered the policy 5 quantitative question (question 3i) 198 (47%) gave a written response. The written responses to Policy 5 were broadly positive.

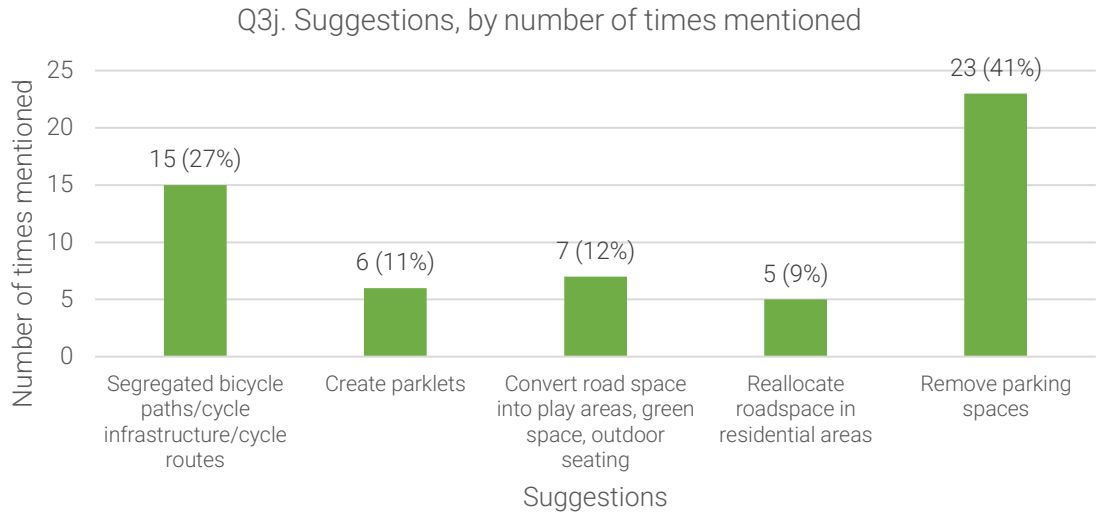
5.1.33. Of the 7 recurring themes, the most common found were respondents are supportive of the vision and the need for cyclable places. This is reflected in the suggestions which were made in the response to this question.

Suggestions

5.1.34. When respondents were asked what else should be included in Policy 5, the most common suggestions identified included a need to remove parking space across the area and to install segregated bicycle paths. The following comments articulate these views:

- *"Reducing car ownership and use is key to the success of the WCAP as well as Haringey's climate targets. Reallocation of road space should include kerb space and it should be made clear that reducing parking and therefore disincentivising driving, especially for short trips, is a key objective".*
- *Suspension of parking on all designated bike routes. Whilst there will be problems in finding space to park the cars, this is essential to freeing up road space so that cyclists have space to ride with motorists.*





5.0. Feedback and Analysis
Section 2 – The Walking and Cycling Action Plan Policies

Existing issues and roads

5.1.35. The most common issues raised in participants responses were regarding concerns for unsafe streets, noise and air pollution, and dangerous junctions. Monument Way has been identified as a particularly dangerous junction. The following comment articulates these concerns:

- *"Better cycle routes down Tottenham High Road and the crazy junction with Monument way."*

Concerns and criticisms

5.1.36. The largest criticism that was articulated by respondents was the negative effect the plans may have on disability access and disabled people.

5.0. Feedback and Analysis

Section 3 – The case for walking and cycling

5.1.10 Section 3 questioned participants to what extent they supported the case for walking and cycling, including the economy, inactivity, air quality, climate change and social justice. 61% of participants chose the most positive option with a further 9% choosing the second most positive option. 20% chose one of the two most negative options and 11% were neutral. This indicates overall support for the Council's case for walking and cycling in the Borough.

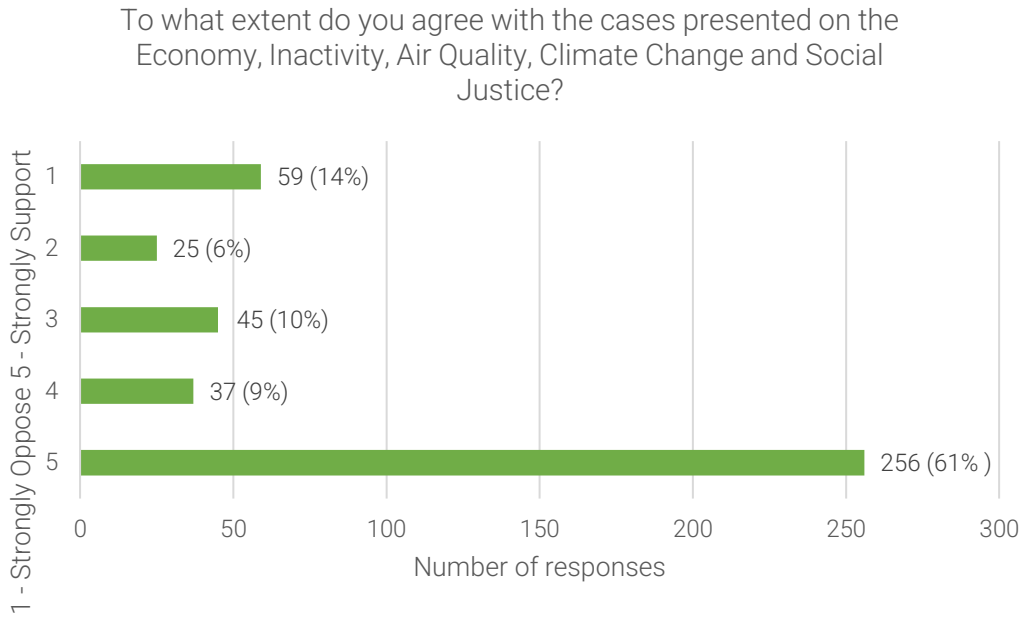
"4.b. Are there any other cases that should be included in this section of the draft WCAP?"

5.1.11 In the survey, one qualitative question was asked relating to other cases which should be included in the draft WCAP. 101 comments were received in relation to this question, 45% of opinion feedback was supportive of the draft WCAP vision.

5.1.12 Of the seven recurring themes, the most common that arose were respondents are supportive of the vision, wanted to see improved accessibility and public transport in the Borough. The main comments to emerge from respondent feedback are as follows:

- Greater priority should be given to air quality, and a reduction of idling cars in the Borough. Some respondents have suggested introducing fines for idling traffic. Supported by this was the need for further research and modelling on redirecting traffic along main roads.
- The WCAP needs to recognise the timing and context, for instance, plans should have considered electric charging point and the shift to low pollution vehicles.
- Some respondents have also suggested greater consideration of elderly and disabled users noting the greater need for public transport.

Supporting the themes above, the respondents also highlighted future consideration must be paid attention regarding social justice, and the worsening air quality on main roads.



5.0. Feedback and Analysis
Section 4 – Walking in Haringey today

5.1.13 Of those 418 comments received, a majority of participants 69% stated they '*Strongly Support*' or '*Support*' the identified priority areas for improving walking infrastructure. 20% said they either '*Strongly Opposed*' or '*Opposed*' the proposal, indicating a general consensus in support amongst participants.

"5b. Do you have any comments on our identified areas with potential for increased walking? Are there any walking routes/paths you would like included in the Action Plan?"

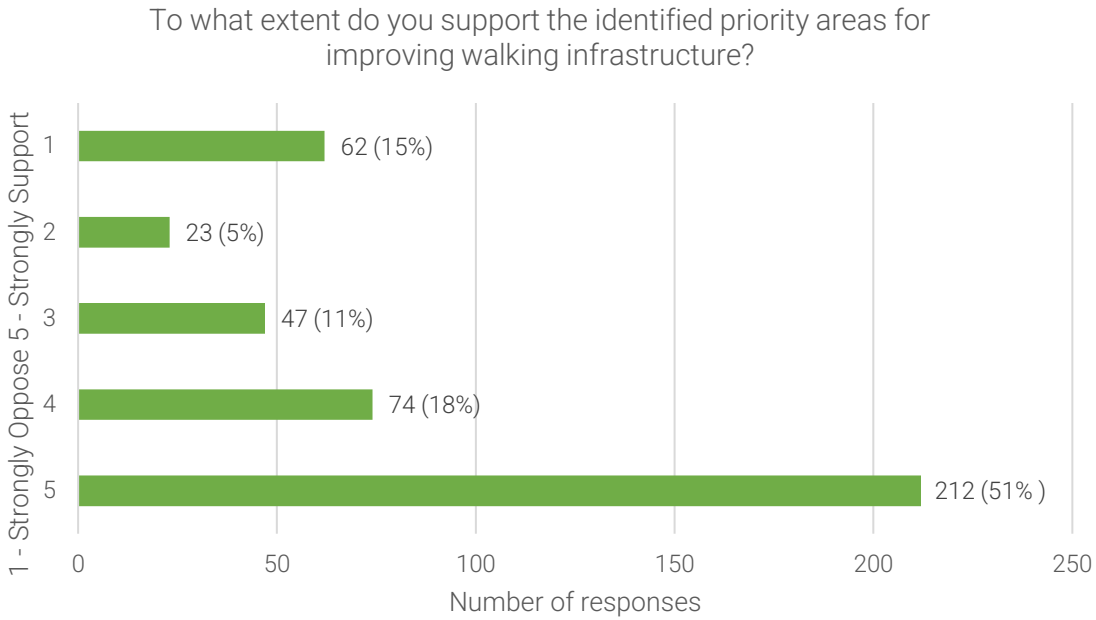
5.1.14 Overall, 136 comments were received. Of the seven recurring themes, the most common that arose were respondents were supportive of the vision, a desire for greater investment in street space and walkable places. Examples of commentary are listed below:

- *"Let's encourage safe and inclusive walking on pavements and in parks - rather than on roads."*
- *"Retain any widened pavements implemented to facilitate social distancing. Consider also using extra width for young children to safely cycle on, introducing them early to active travel."*

Roads and Places

5.1.15 Through analysing the data, issues pertaining to dangerous roads, crowded places and dangerous junctions were frequently identified. Tottenham High Road, Shelbourne Road , Muswell Hill and Green Lanes received 65% of total mentions from respondents, and include the following suggestions:

- *"Would like to see some routes to the east of the Tottenham High Road, Carbuncle Passage from High Road to Tottenham Marshes Bridge, Shelbourne Road as a north to south route that is residential. more needs to be done to support safe access to green spaces via Tottenham Marshes Bridge and clean routes from Northumberland Park station to the marshes and also Watermead Way underpass."*
- *"There has also been an increase in the use of the Greenways from Park Road to Queen's Wood and Muswell Hill. There is a danger point where this route crosses Wood Vale."*



5.0. Feedback and Analysis
Section 5 – Cycling in Haringey today

5.1.16 When looking at the sentiment towards the council's analysis of the existing cycle network, including gaps in the current network, participants expressed mixed opinions. 35% of participants opted for the most positive option, with a further 24% who said they '*Support*'. 24% opted for '*Strongly Oppose*' or '*Oppose*' and a further 17% were neutral, indicating an overall support for the Council's cycle analysis.

"6b. Are there any parts of the existing cycle network not included in the plan which should be?"

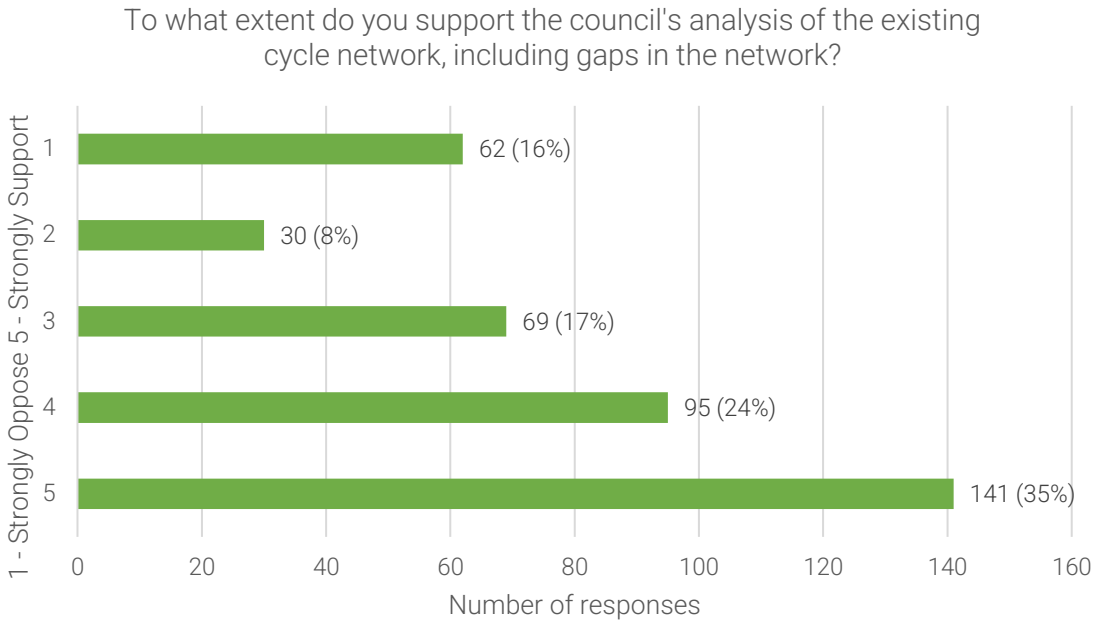
5.1.17 In the consultative survey, one qualitative question was asked relating to the existing network. Overall, 156 comments were received in relation to this question.

5.1.18 In relation to this question, the key themes identified and suggested most frequently from respondent feedback were introducing cyclable places and safer and cleaner streets. An example from the survey is shown below:

"*Any new sensible cycle lanes would be excellent."*

5.1.19 Those who expressed positive sentiment did so on the basis of the following areas:

- Fully supportive of the vision and plans, with provisions for safeguarding cyclists and improved infrastructure.
- Respondents welcome plans and proposals for improving the local cycle network.
- Plans should be developed and introduced quickly across the Borough.



5.0. Feedback and Analysis
Section 5 – Cycling in Haringey today

Existing Issues

5.1.20 A majority of respondents to this question raised concerns on current dangerous roads and junctions. Respondents would like to see improvement to current cycle networks, a summary of the comments received can be found below:

- Greater consideration needs to be paid to the dangerous roads and junctions, and the impact this has on cyclist safety.
- Linked to this were several requests for segregated cycle lanes across the Borough, and for better signage. Areas referenced most frequently included Park Road, Green Lanes and St Anns Road. Some respondents felt that unaware or aggressive drivers are a key issue to cyclist safety in Haringey.
- A number of respondents raised issues on unsuitable cycle lanes for cyclists which include poor roads and uneven pavement surfaces.
- Cycling in Haringey is considered dangerous and the network is not connected properly to the wider London cycle network. Green Lanes and Wightman Road were frequently mentioned as unsuitable cycling routes.

5.0. Feedback and Analysis
Section 5 – Cycling in Haringey today

Suggestions

5.1.21 In response to this question, 60% respondents were critical of the existing walking and cycling network and subsequently supported the draft WCAP vision. Among those comments, the following suggestions emerged:

- Introduce segregated cycle networks to help improve the safety of cyclists. Respondents felt that cycling on main roads should have consistent paths, not intermittent paths that force cyclists to be alongside drivers.
- There needs to be better consideration and coordinated effort between all London boroughs on improving the cycle network. Requests have been made to better link all local cycle networks together, within the borough and with neighbouring boroughs of Islington and Hackney.
- Respondents would like to see more cycle infrastructure and segregated routes, especially in the East-West traverse.
- Respondents requested to see plans developed on the following routes:
    - Green Lanes to St Anns Road.
    - Glenwood Road - Belmont Road.
- There has been significant commentary supporting efforts for improved lighting alongside the cycle network, especially around Finsbury Park to improve cycling at night.

Roads and Places

5.1.22 Green Lanes, Turnpike Lane, Finsbury Park, Bounds Green Road received significant mentions from respondents, and include the following suggestions:

- *"It is essential there is a bike lane on Green Lanes between Turnpike Lane and Finsbury Park."*
- *"There could be a Haringey cycle route on a north-south axis from top of Lordship Rec to both Finsbury Park and Stamford Hill via Downhills Park."*
- *"It would be great to see a dedicated cycle lane on St Ann's Road to better connect CS1 with the borough."*

"6c. Please provide any other comments on this section"

5.1.23 In this section respondents were asked to provide any additional information and comments they wished to be included in the survey.

5.1.24 Of the seven recurring themes in respondent feedback, supporting the vision and cyclable places were the most frequently mentioned. Examples are shown below: *"Overall, this is incredibly promising and shows a bold intention to make our lives better through enabling us to get around in ways which are healthier, cheaper and without noise pollution or congestion."*

- *"I strongly support the proposal to include a cycle lane on Green Lanes. Cyclists need to be able to use the main roads safely and not always be diverted via back streets."*

Roads and Places

5.1.25 This section was a free text response. Green Lanes, Wightman Road, Seven Sisters Station, Wood Green and Shepherds Hill received the largest number of mentions in relation to cycling.

Further suggestions were made in relation to the existing cycle network, and are detailed below:

- *"What are solutions for problems identified in the gap analysis? The proposals to bridge the gaps are missing from the WCAP."*
- *"A large programme of cycle hangar installation is desperately, desperately needed."*
- *"It would be great if the overarching plan could be split into smaller sections with earlier deadlines so the public can follow progress and witness accountability."*

5.1.26 Overall, there was concern on future increase of traffic and the impact this could mean for climate change.

5.0. Feedback and Analysis
Section 6 – Barriers

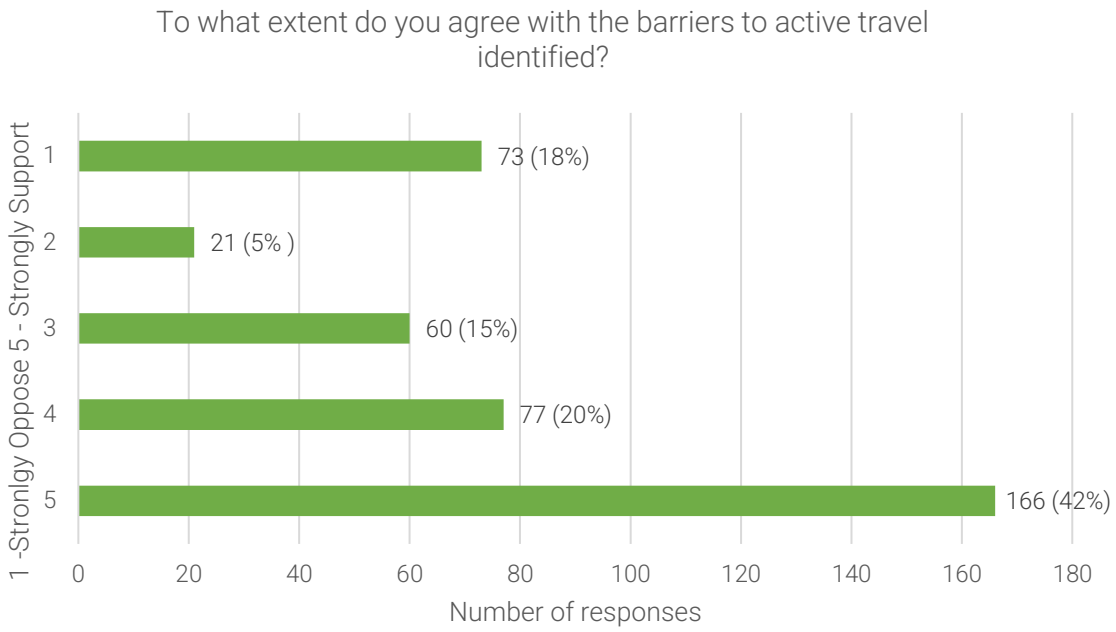
5.1.27 Overall, the sentiment amongst participants for this question was positive. 62% of participants opted for one of the two most positive options, compared with 23% of participants who chose one of the two most negative options.

"7b. What barriers have prevented you from walking or cycling?"

5.1.28 Overall, 282 comments were received to this question. An analysis of these comments found they were broadly negative towards the current barriers in the borough.

5.1.29 Of the seven recurring themes, the most common that arose were respondents who were supportive of the draft WCAP vision, improving accessibility and tackling the climate emergency. Examples are listed below:

- *"Air pollution is always a major problem, and deters me from walking on busy roads."*
- *"Age and strength. Some of us have to use cars to some degree to get around."*
- *"Few places to rest while walking in the area as there are plenty of hills."*
- *"Lack of dedicated routes to get around. I do cycle in the borough but only after having to preserve through a lot of fear. I feel unsafe in many of these sections that are in Haringey."*



5.0. Feedback and Analysis
Section 6 – Barriers

Existing issues

5.1.30 The main barriers identified to walking and cycling were dangerous roads, safety and pollution. The main themes that emerged in regard to the barriers are detailed below:

- Poorly lit streets which make walking or cycling difficult and unsafe.
- The volume of cut-through traffic in the borough, which acts as a rat run and the road surface is poor.
- Poor cycling infrastructure and segregation between motorists and cyclists, which prevents cyclists from moving freely and with ease in the borough.
- Concerns about high levels of pollution, and trip hazards from poorly maintained pavements.

Suggestions

5.1.31 Suggestions on how to address barriers in Haringey included:

- Requests for increased cycle infrastructure, including more bike hangers, increased surveillance to help prevent bicycle theft, segregated cycle lanes and better signage.
- More detail has been requested on the detailed plans for addressing barriers to walking and cycling in the Borough.
- Reducing vehicle use. Respondents mentioned that dangerous roads and junctions, as well as speeding cars and rat running act as a barrier to walking and cycling in Haringey.
- Some respondents have argued this needs to be an educational and behaviour change campaign to achieve more active travel. Without this, residents are unlikely to travel actively.
- A significant number of individuals used this section to raise concerns around the volume of traffic on the residential streets which make it difficult and unpleasant places to live.
- There was commentary on safety at night for women, concerns were raised around bad lighting or anti-social behaviour.
- In this question, there were many requests for explanations on what the improved cycling and walking infrastructure is, and where it will be implemented in Haringey. Comments also suggested the maps were not clear or detailed enough for respondents to understand the Council's vision.

5.0. Feedback and Analysis

Section 7 – Walking in Haringey in the future

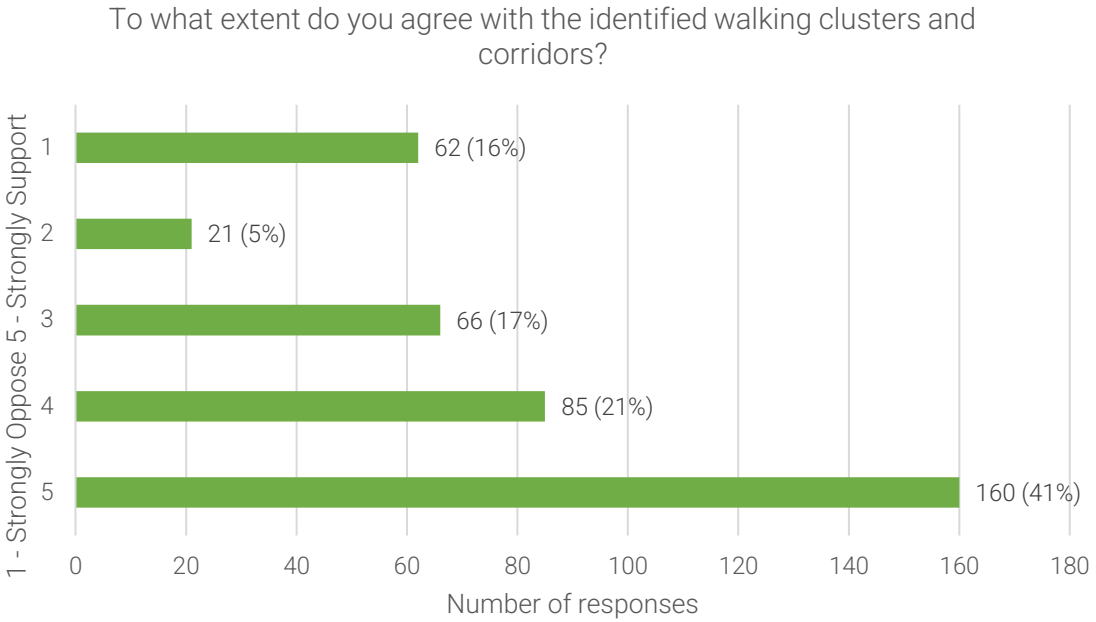
5.1.32 When looking at sentiment towards the identified walking clusters and corridors, participant responses indicate an overall positive response. 62% of participants opted for one of the two most positive options when answering the questions, "*To what extent do you agree with the identified walking clusters and corridors?*", 21% opted for one of the two most negative options. 66 participants (17%) said they were neutral to this question.

"*8b. Are there any future walking clusters and corridors not included which should be?*"

5.1.33 97 comments were received in relation to this question. Respondents would like to see improvement to current walking corridors and more green space. The overarching themes included safe and cleaner streets and walkable places.

5.1.34 Those respondents who expressed positive sentiment did so on the following basis:

- There is potential to create an attractive area with green spaces throughout the Borough.
- Haringey should become an area with benches and parklets to ensure that people, not cars, are able to travel actively, breathing clean air.
- Encourages safer walking routes in the Borough, which connects places together and walking for leisure.



5.0. Feedback and Analysis
Section 7 – Walking in Haringey in the future

Roads and Places

5.1.35 Seven Sisters, Green Lanes, and Archway Road received the highest number of comments in relation to this question. Comments generally focused on improved pedestrian crossings, wider pavements and green spaces. Respondents made the following comments and suggestions:

- *"Improved pedestrian crossing on Archway Road.'"*
- *"Missing links are Turnpike Lane to Seven Sisters and Harringay to Manor House along Green Lanes. As these corridors are both popular walking and cycle corridors, these must be included."*
- *"Extend the walking cluster on the Ladder further south towards Finsbury Park & up to Manor House."*

Existing issues

5.1.36 The majority of the respondents were critical of the existing network. Among those who were critical, the following suggestions emerged:

- The clusters and corridors that have been identified are too narrow, and it is unclear where the improvements will be introduced.
- Current walking infrastructure is not safe or accessible, there are damaged pavements, bad lighting which make the streets unsafe.
- Current roads are too car centric and do not allow for safe pedestrian passage.
- There was commentary and support to keep open footpaths so the local community could enjoy walking, for instance Parkland Walk.

Suggestions

5.1.37 The following suggestions were received to improve the future walking corridors and clusters:

- Improving the urban environment of Green Lanes would make a big difference and reducing the car-dependency of the Arena Shopping Centre is an opportunity to improve the area.
- Requested to remove traffic from roads to address the current volume of traffic. Many questioned the traffic on Alexandra Palace Park, which should be for walking and cycling.
- Suggestions also included revised plans and funding so that residents and communities can better understand the vision and implementation. For instance, Stroud Green and Highgate were frequently mentioned as key walking routes in Haringey that needed to be included as part of the WCAP.
- Safer passage and access to footpaths and walking clusters should be built around parks.

5.0. Feedback and Analysis

Section 8 – Cycling in Haringey in the future

5.1.38 In response to the questions, "*To what extent do you agree with the council's future cycling routes and the recommended cycle corridors?",* participant feedback indicates general support (62% opted for '*Strongly Support'* or '*Support').* Slightly more participants (18%) chose the most negative option, than those who chose the most negative option for the identified future walking clusters and corridors (15%).

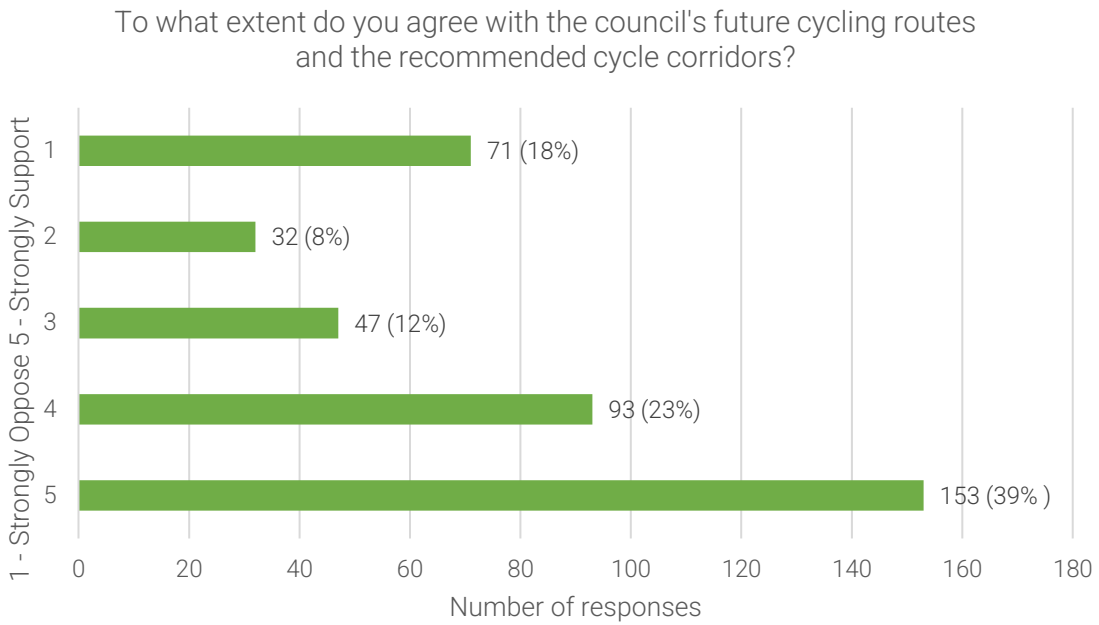
"*9b. Are there any future cycle routes and corridors not included which should be?"*

5.1.39 147 responses were received to this question, with a range of positive and negative feedback. The most frequently mentioned overarching themes included cyclable places, investing in streets spaces and accessibility.

5.1.40 Those 25 respondents (18%) who expressed a negative sentiment did so for a range of reasons, the most frequent arguments include the following:

- Haringey cycle routes are sufficient as they are and do not require/want any further changes.
- Too much emphasis and road space given to cyclists when they are the minority road users.
- The current plans are not ambitious enough and have too many gaps, this leaves cyclists vulnerable to other road users.

5.1.41 Those respondents who expressed positive sentiment (10%) for future cycle routes and corridors, did so predominantly as an advocate for additional cycle policy, infrastructure and road space allocated to cyclists. A number of roads and areas were referenced in their responses in relation to requests for further cycle routes and corridors and is analysed below.



5.0. Feedback and Analysis
Section 8 – Cycling in Haringey in the future

Roads and Places

5.1.42 Of those respondents that referenced a road, area or place in their feedback, Green Lanes was mentioned most frequently, followed by Finsbury Park, Wightman Road, and Wood Green. A selection of responses referencing these locations is shown below:

Green Lanes

- *"Haringey Green Lanes needs to be given massive priority (I see it is currently unfunded which is disappointing and concerning). It is the highest corridor for collisions by some mile which is not surprising having cycled along it many times myself! It's dangerous with such a massive presence of parked vehicles, heavy congestion and dangerous vehicle manoeuvring."*
- *"The Green Lanes cycle lane is a must! Without that the map is missing one of the most important strategic routes."*

Finsbury Park

- *"Yes, no direct routes from Finsbury Park to Crouch End for example."*
- *"It misses out on the area around the north west corner of Finsbury Park where cyclists and pedestrians frequently cluster."*
- *"The route connecting Wightman Road to Finsbury Park should be a priority."*

Wightman Road

- *"Wightman Road is not a suitable alternative to a cycling route on Green Lanes."*
- *"Wightman road would need the junction at Turnpike Road redesigned for a cycle route there to work."*

Wood Green

- *"We need cycle lanes east – west between Wood Green & Tottenham, e.g. White Hart Lane."*
- *There is an easy opportunity to create a flat and safe cycle route from the Gardens area to Wood Green, using Langham Road as a connector to the existing east-west route to the North."*

5.1.43 A number of suggestions and potential concerns were raised as part of respondent feedback; the following were mentioned most frequently:

- A significant number of respondents requested more segregated cycle lanes in the Borough and referenced safety was the prime reason that currently dissuades them from either feeling more comfortable when cycling or choosing to cycle more.
- Requests for further cycle infrastructure was another common theme to arise in respondent feedback, this included more bike hangers, cycle training and clearer road signage.
- Some residents requested for all cycle lanes to be connected, creating a Borough-wide cycle route.

5.0. Feedback and Analysis
Section 9 – Low Traffic Neighbourhoods

5.1.44 Section 9 of the survey asked residents the following questions:

- 10a. To what extent do you support the council's criteria-based approach for identifying future LTNs?
- 10b. Are there any other criteria we should include?
- 10c. To what extent do you agree with the council's assessment of vehicle evaporation and its case for LTNs?
- 10d. Please provide any other comments on this section.

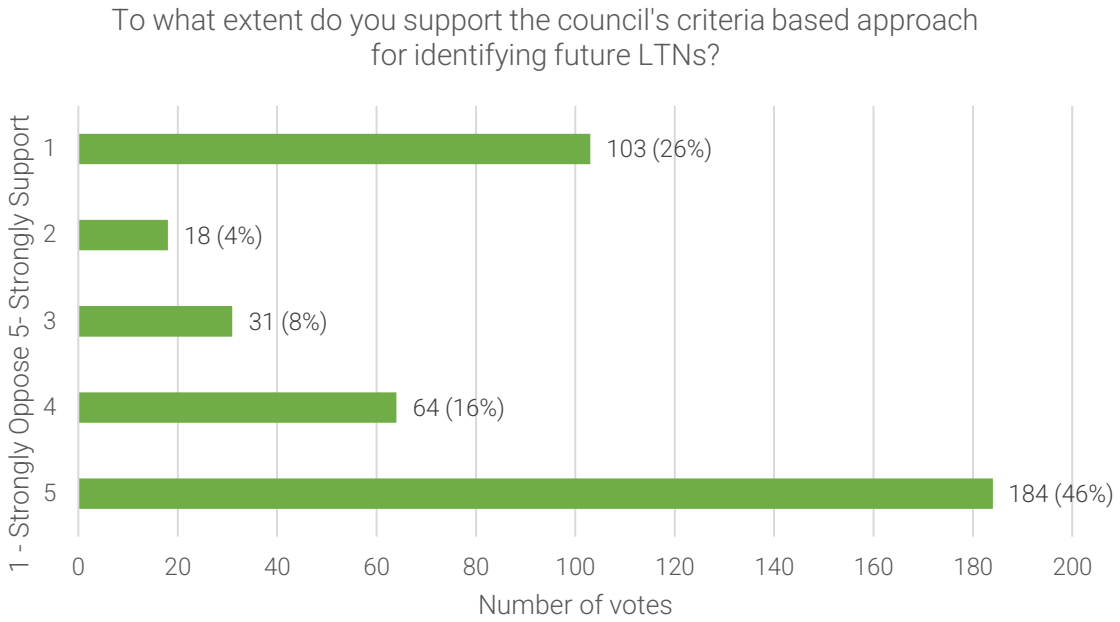
Questions 10a and 10c were quantitative and 10b and 10d qualitative. The below section analyses the responses given in this section.

5.1.46% of respondents picked the most positive option when answering the question, "*To what extent do you support the council's criteria based approach for identifying future LTNs?",* with 26% opting for the most negative option, indicating overall support but within the context of some opposition.

"*10b. Are there any other criteria we should include?"*

5.1.46 122 comments were received to this question. Greatest sentiment given was negative (39%). The most common themes given for this sentiment includes:

- Some residents are concerned about the potential for displaced traffic and increased pollution, should further LTNs be introduced. Muswell Hill, Wood Green and Shepherds Hill were areas mentioned where residents are concerned about increased traffic and pollution, following the introduction of further LTNs.
- A number of comments criticised the current draft WCAP criteria for LTNs and alternatively suggested the inclusion of a road safety classification, accident rates and greater consideration given to LTN boundary roads.
- The potential impact on public transport, particularly buses, and emergency vehicles was a concern raised by a number of participants.

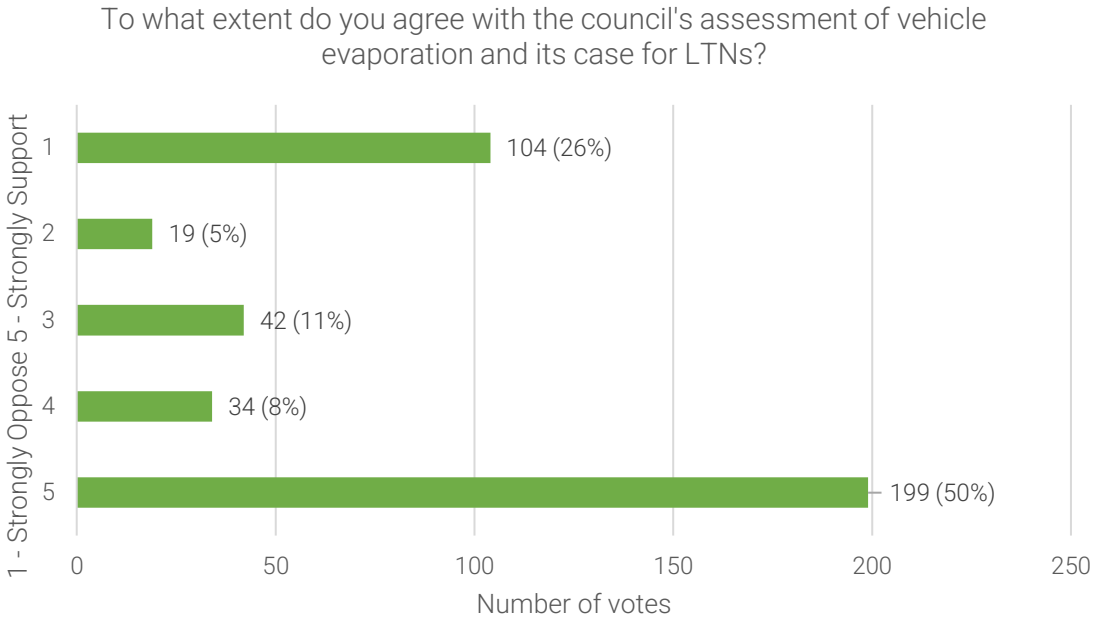


5.0. Feedback and Analysis
Section 9 – Low Traffic Neighbourhoods

5.1.47 Respondents made a number of suggestions on what they felt is currently missing from the LTN policy. The most popular suggestions were as follows:

- The topic of equality was raised frequently by participants. This included suggestions that greater recognition and consideration should be given to those who are less able to walk and/or cycle, such as the disabled or elderly. There were also comments concerned about the potential financial impact of LTNs to businesses. Some residents stated that LTNs have a disproportionately negative impact on residents in affordable housing.
- There were several requests for additional LTN neighbourhoods, including areas with high density of schools and boundary roads to LTNs. Endymion Road to Stroud Green, Muswell Hill, Crouch End and Highgate were referenced areas that participants would like to see access reduced to traffic.
- A number of requests were received for a prioritisation plan and timeline for the draft WCAP.

5.1.48 Similar to Question 10(a), this question divided participant opinion. 50% of respondents chose the most positive option when answering this question, compared with 26% who chose the most negative option. Again, this suggests a general agreement for the Council's assessment of vehicle evaporation and its case for LTNs, however there exists a minority who remain against.



5.0. Feedback and Analysis
Section 9 – Low Traffic Neighbourhoods

"10d. Please provide any other comments on this section."

5.1.49 Participants were asked if they had any further comments they would like to add to the LTN policy. 137 comments were received and the most common sentiment was negative (41%), followed by positive (28%). Among those who expressed a negative sentiment to the LTN policy, the following themes emerged:

- Some residents do not believe LTNs will result in traffic evaporation and are concerned this will result in displaced traffic, causing increased congestion and pollution levels in other areas of the Borough.
- The current reasoning behind LTN is flawed and would like to see further explanation and evidence for introducing LTN policy.
- Some residents were keen to stress that not all journeys can be undertaken on foot or bicycle and require the use of private vehicles.

5.1.50 Those who expressed a positive sentiment to LTN policy did so based on the following themes:

- Supportive of the overall LTN vision.
- Would like a network of LTNs introduced in Haringey. One participant offered the following comment:

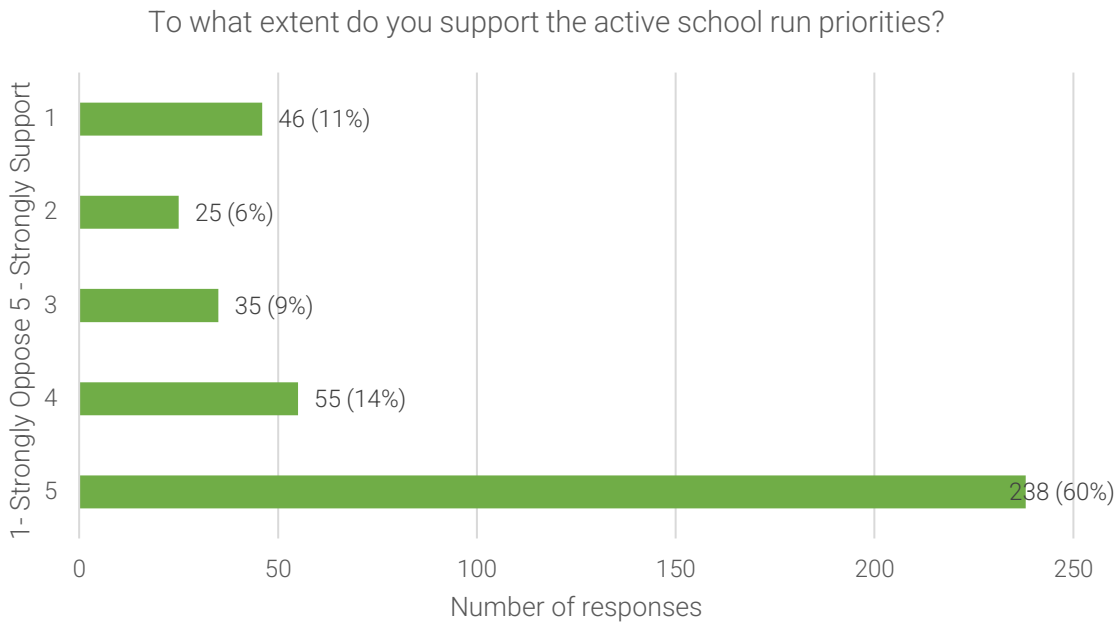
"I strongly approve of the idea that a network of LTNs is often a better option than protected cycle lanes for encouraging cycling. I believe disincentives to drivers need to be quite strong to evaporate traffic."

- Supports the vision of less private vehicles in the Borough and suggests the reduction of parking as an incentive and means to allow more road space for other users.
- Some residents offered support for the policy, however felt that more "*noise*" and justification for the policy should be made to clearly explain its benefits. Participants suggest more rigorous analysis and explanation would improve the case for further LTN introduction.

5.0. Feedback and Analysis
Section 10 – Future – Active School Run

5.1.51 Section 10 consisted of one quantitative question that asked participants their level of support for the active school run priorities, as set out in the draft WCAP. An analysis of the 399 responses received is found below.

5.1.52 60% of respondents picked the most positive option when answering the question, "*To what extent do you support the active school run priorities?*", compared with 11% who opted for the most negative option. This indicates a strong general support for the draft WCAP's active school run priorities.



5.0. Feedback and Analysis

Section 11 – Future – Active Travel and Development

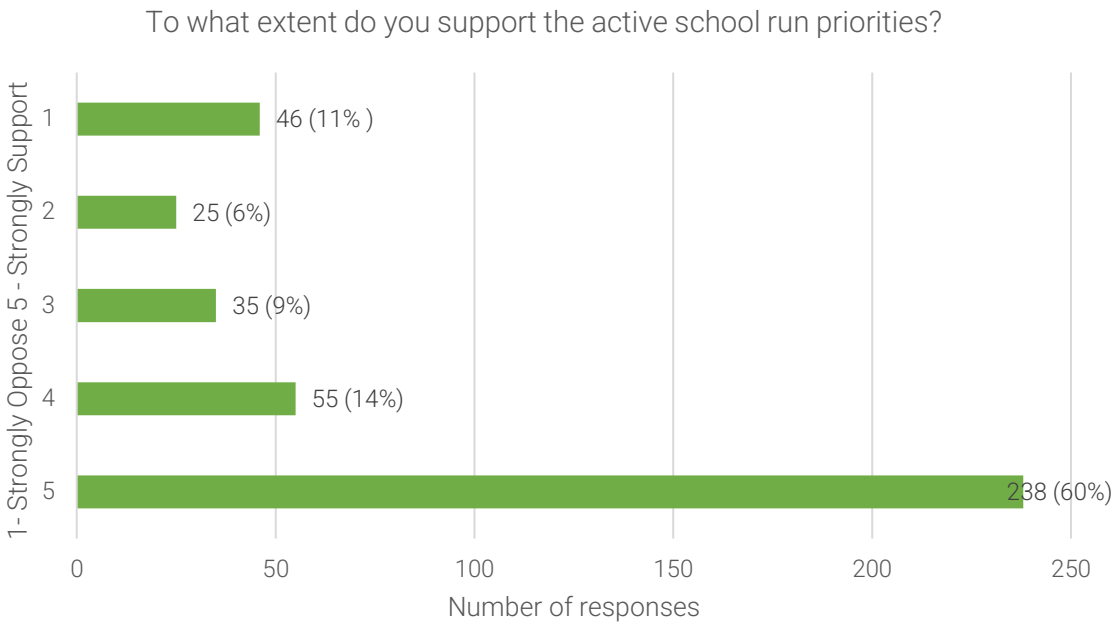
5.1.53 Section 11 consisted of one quantitative and one qualitative question relating to level of support for the draft WCAP's active travel priorities.

5.1.54 In response to this question, 60% of respondents said they strongly supported the draft WCAP's active travel priorities, followed by 11% of respondents who said they strongly opposed the policy. Overall, this suggests a general support for the policy.

5.1.55 Question 12(b) asked respondents to provide any other comments related to active travel priorities and a variety of answers were given in response. The following themes emerged:

- A significant number of respondents stated they would like public transport added to the list of active travel priorities.
- More cycle and walking infrastructure introduced, including modal filters, segregated cycle lanes and wider pavements, to support resident's active travel.
- Greater recognition that not all residents have equal access and ability to actively travel, and greater consideration given to those individuals/groups.
- Some stated that further parking restrictions were necessary to ensure the smooth travel of the active travel modes.
- As likewise seen in other questions, some residents remain sceptical about the active travel priorities and state the measures will result in increase congestion and pollution. One resident offered the following comment:

"*This is all counter-productive. It will result in more congestion, which will result in more pollution. It tries to suggest it is encouraging healthy activity. What it really means is more time stuck in traffic and less time for healthy activity.*"



5.0. Feedback and Analysis
Section 12 – Additional comments

5.1.56 Question 13, "*Please use this space if you have any further comments on the above proposals, including any changes you would like to see",* was the last question of the draft WCAP vision & policies questionnaire and gave participants the opportunity to offer any further comments they had on the proposals. 152 comments were received, 27% of those expressed a negative sentiment and 13% were positive.

5.1.57 The main themes to emerge from respondent feedback were as follows:

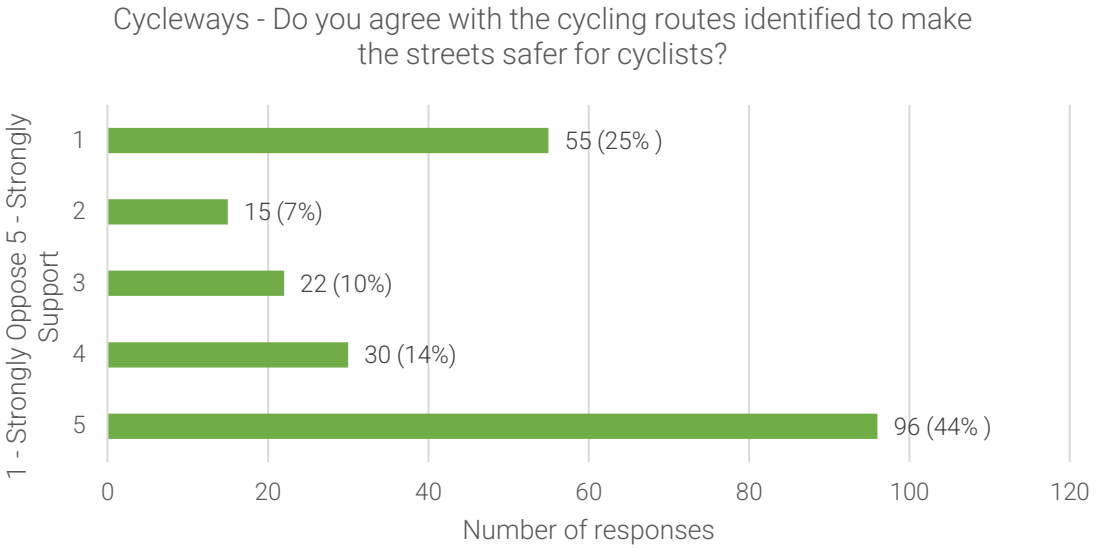
- Greater reference and priority should be given to public transport in the WCAP, including improve infrastructure and services, as well as more bus route options to reduce reliance on private motor vehicles.
- The proposals do not consider those who are unable to take part in active travel, including disabled, elderly, those with more than one young child and those with health issues.
- Some wanted further parking restrictions introduced in the Borough. Suggestions included greater enforcement, increased parking charges and more no parking zones.
- Requests for more cycling and walking infrastructure to support the proposals. Requests included more bike hangars, ensuring all bikes lanes are segregated and connected and introduction of an e-bike hire scheme for the hillier areas of the Borough.
- Some used the question to state their opposition to LTNs with concerns more would increase congestion and pollution, as well as concerns that LTNs will stifle the production of local business.

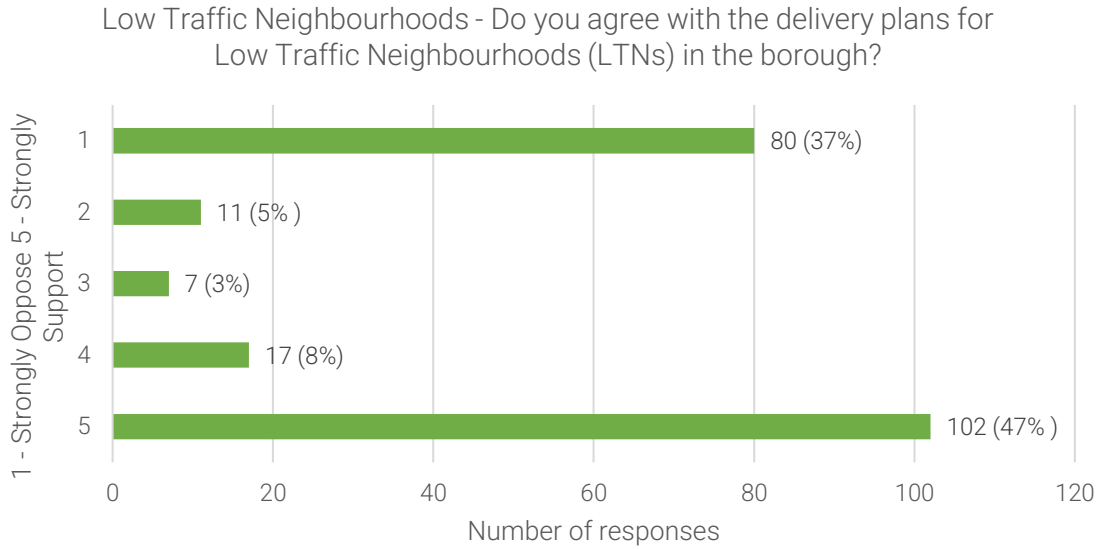
5.2. Delivery Plan Questionnaire
Quantitative analysis

5.2.1 In the survey, 6 quantitative questions and 1 qualitative question was asked to test sentiment towards the draft WCAP Delivery Plan. The 6 quantitative questions were tested through a five-point Likert scale in which the higher scores indicated more positivity to the proposition. Participants did not have to submit an answer to each individual question and could submit their survey without answering all questions. The qualitative question was a free text box and asked participants, "*Is there anything else you would like to see included in the delivery plans?"* This section analyses the 223 responses received to the Delivery Plan Questionnaire.

5.2.2 The question, "*Cycleways – Do you agree with the cycling routes identified to make the streets safer for cyclists?",* tested the sentiment towards the cycle routes identified in the draft WCAP Delivery Plan. 44% chose the most positive option when answering the question and a further 25% chose the most negative option indicating some differences of opinion.

5.2.3 The results from the question regarding LTNs were polarised. The average score for this question was slightly greater than 3, showing a slight margin of approval for the delivery plans for LTNs in the Borough.

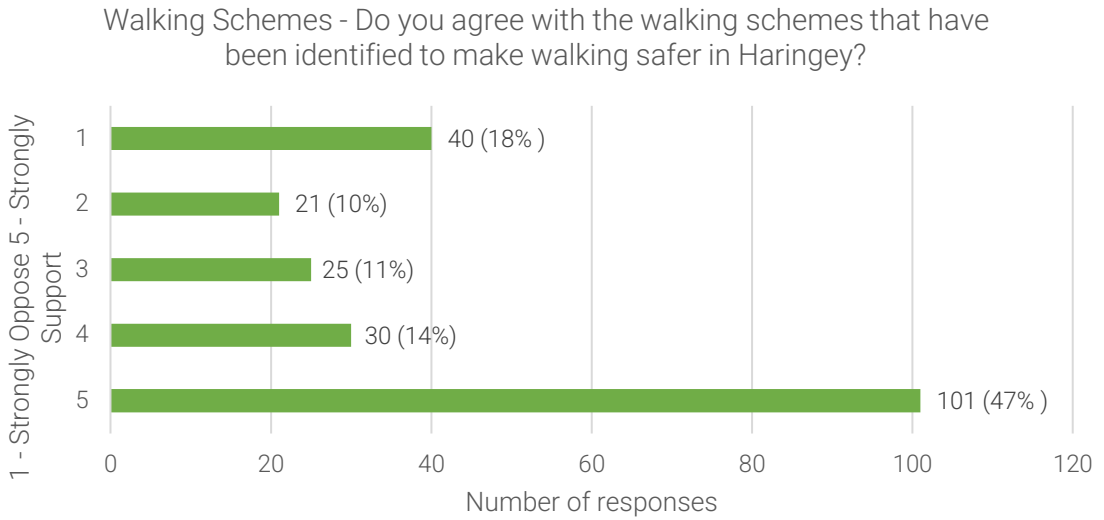


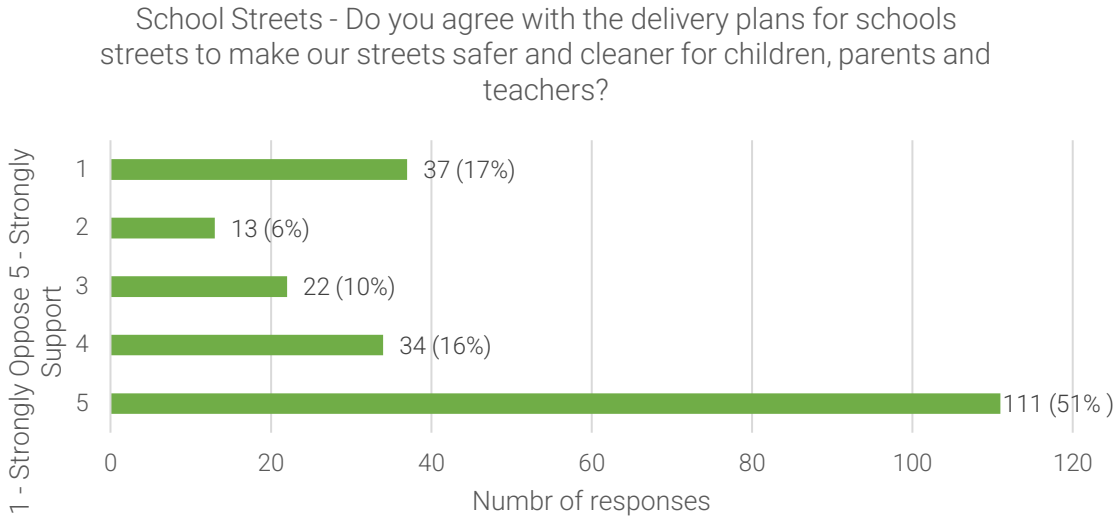


5.2. Delivery Plan Questionnaire
Quantitative analysis

5.2.4 In response to the question, '*Walking Schemes – Do you agree with the walking schemes that have been identified to make walking safer in Haringey'*, a majority of participants (61%) chose the top two most positive options compared with 28% who chose the two most negative options. This indicates strong overall support for the identified walking schemes in Haringey.

5.2.5 Responses to the question on School Streets again indicates general support for those plans in the delivery plan. 51% of participants opted for the most positive option, with 17% choosing the most negative option.



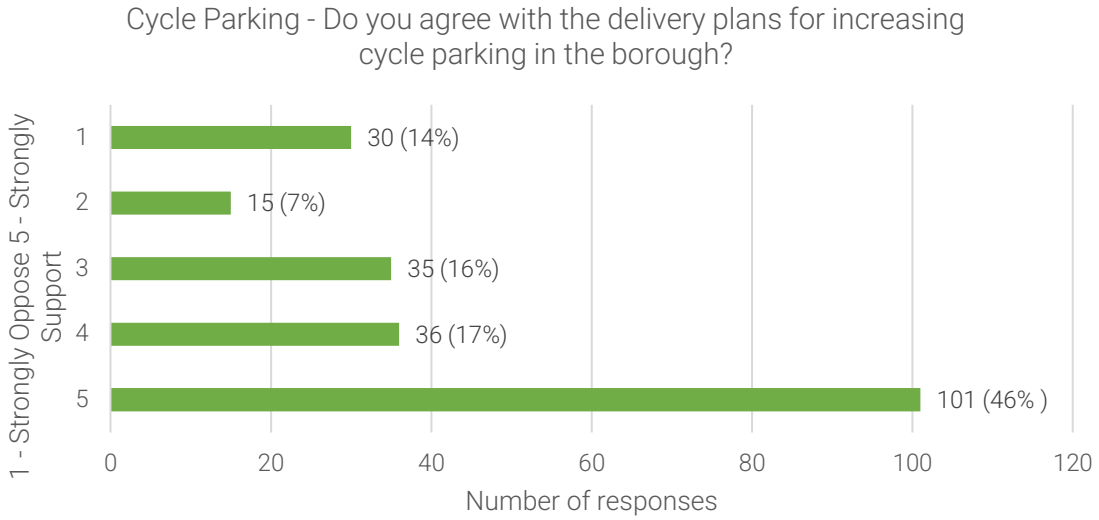


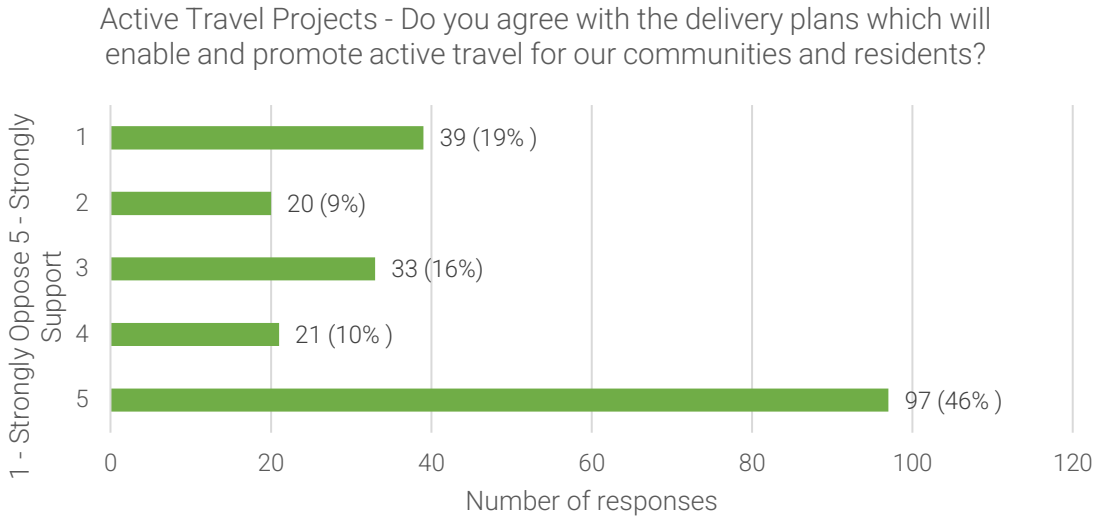
5.2. Delivery Plan Questionnaire
Quantitative analysis

5.2.6 The results given for the question, '*Cycle Parking – do you agree with the delivery plans for increasing cycle parking in the borough',* were slightly more mixed. The average given to what extent participants agreed with the delivery plans for increasing cycle parking in Haringey was 3.8, suggesting a slight preference for support. Slightly more (40%) participants chose the middle three score options (support, neither support or oppose, and oppose) for this question than other questions.

5.2.7 46% of participants chose the most positive option when answering question, *"Active Travel Projects – Do you agree with the delivery plans which will enable and promote active travel for our communities and residents?",* with a further 10% who said they '*support'* the policy. Compared with 28% of participants who opted for *'strongly oppose'* or '*oppose'*, this indicates a general overall support for Active Travel Projects.

The next section analyses the feedback received to the one qualitative question, relating to the delivery plan.





5.2. Delivery Plan Questionnaire
Qualitative analysis

5.2.8 Overall, 167 (163 digital surveys and 4 paper copies) comments were received to this question:

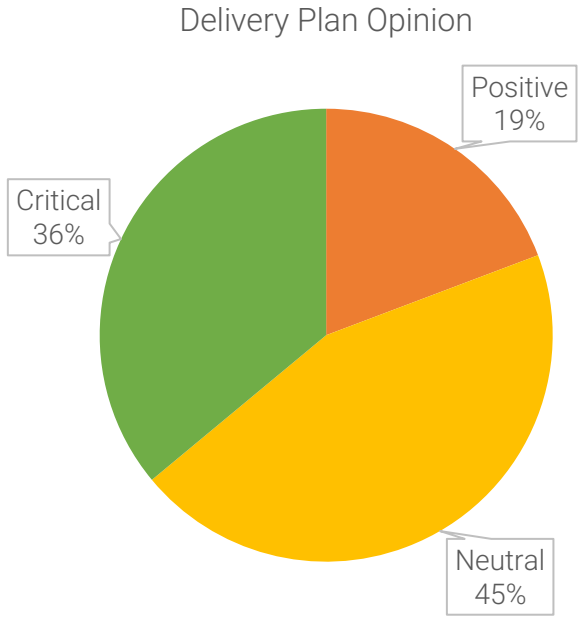
- *"Is there anything else you would like to see included in the delivery plans?"*

44% of comments received were neutral to the delivery plan, followed by 36% negative and 19% positive.

Of those who expressed a positive sentiment to the delivery plan, they did so predominantly based on overall support for the draft WCAP's vision and strategic aims to increase active travel in the Borough and to realign road priorities to meet ambitions in the 2018 Haringey Transport Strategy and the 2018 Mayor of London Transport Strategy.

Among those who were critical, the following themes emerged:

- Some suggested that more cycle lanes and LTNs will divert traffic to other areas of the Borough, increasing congestion and pollution in these areas.
- Negative sentiment received regarding LTN policy as a whole.
- Some residents felt that the consultation was under advertised and would have preferred more borough-wide physical events.
- Concerns that the current version of the delivery plan does not consider accessibility to active travel enough and should make a more concerted effort to recognise the needs of disabled, elderly residents and those with young children.
- Some felt the plans are biased towards cyclists, whilst only representing a small proportion of Haringey's population.



5.2. Delivery Plan Questionnaire
Qualitative analysis

Suggestions

5.2.9 Of those that provided suggestions on how to improve the draft WCAP, the following themes emerged in the analysis:

- Requests for increased cycle infrastructure, including more bike hangars on High Streets and near residential areas and increased surveillance to help prevent bicycle theft.
- Greater consideration and attention needs to be given in the Delivery Plan to disabled residents and those with mobility issues, who rely on carer support or using motor vehicles. Some residents felt that disabled and elderly residents were marginalised by the Delivery Plan outlined in the draft WCAP.
- Linked to this, there were several requests for more explanation of where the funding for the measures in the Delivery Plan is going to come from. Some felt the plan was hypothetical and unfunded, so therefore difficult to comment on.
- Some stated further explanation should be included in the Delivery Plan as to why active travel and reduced use of personal vehicles is advantageous for all the community. Without this education, it is the view of some, that the Council may fail to incentivise residents to travel more actively.
- Some wanted the Council to ensure all cycle lanes in the Borough are segregated and continuous, to help ensure cyclists feel safe in light of difficult interaction with vehicles. Main roads, such as Green Lanes, have been identified as particularly unsafe for cyclists with some calling for a cycle lane to be installed there specifically.
- There was commentary supporting efforts to reduce car use in the borough and support for an acceleration in the introduction of LTN with some advocating the introduction of a borough-wide LTN scheme. Areas identified as ideal for an intervention included Shelbourne Road and Alexandra Park Road.
- A significant number of individuals used the question on the Delivery Plan to ask the council not to close Shepherds Hill to traffic, as it is perceived this measure will cause increased congestion and pollution down Wood Vale and Wood Lane. There were some suggestions that Wood Lane and Wood Vale should be included in an LTN area.

5.3. Delivery Plan Interactive Map

5.3.1 The Delivery Plan Interactive Map was analysed according to the 12 postcode districts in LB Haringey and is referenced to throughout this section of the report, these are:

- N10 – Cranley Gardens, Fortis Green, Highgate Wood, Muswell Hill
- N11 – Bounds Green, Brunswick Park, New Southgate
- N13 – Palmers Green
- N15 – Harringay, South Tottenham, Tottenham, West Green
- N17 – Tottenham Hale
- N18 – Upper Edmonton
- N2 – Coldfall, East Finchley
- N22 – Alexandra Park, Bowes Park, Noel Park, Wood Green
- N4 – Brownswood Park, Finsbury Park, Stroud Green
- N6 – Highgate, Parliament Hill, Queen's Wood
- N8 – Crouch End, Hornsey

Themes

5.3.2 Out of the seven key occurring themes identified, 'safer and cleaner streets' was the most prevalent issue across all of the responses and was the most frequently mentioned in the N10, N11, N17, N6 and N8 postcodes. This tended to relate to respondents wanting to see road surfaces and pavements being improved, traffic enforcements to prevent dangerous driving and speeding, and littering being addressed. Some examples referencing this theme are shown below:

- *"The pavements here are difficult to navigate - a myriad of different surfaces, kerbs, bumps, if you have mobility issues or are pushing a bugging it's tricky."* (N22)
- *"This Junction is a death trap. cars ploughing into pedestrians crossing on a green man every day."* (N11)

5.3.3 The second most recurrent theme was 'cyclable places' which was the most mentioned theme in the N4 and N15 postcodes. This was most related to people wanting to see segregated cycle lanes and the introduction of proper cycle infrastructure to encourage cycle travel. This was followed by 'walkable places', which was mentioned frequently by respondents and related to people wanting to see the implementation of pedestrian crossings and lighting to make walking at night safer. Some examples referencing both themes are shown below:

- *"A continuous, protected cycle lane is needed here as cyclists are constantly squeezed by motor traffic."* (N4)
- *"Vans are often parked over the cycle lane here and nothing is ever done about it. So dangerous for cyclists having to then navigate in speeding traffic."* (N4)
- *"Make this pedestrian crossing a joint cycle / pedestrian crossing like the one on Alexandra Palace Station Road."* (N22)
- *"Pedestrian crossing needed here."* (N11)

5.3. Delivery Plan Interactive Map

5.3.4 Five existing issues and future concerns were identified in the analysis: dangerous roads, pollution (noise and air), traffic and congestion, car parking and the unsuitability of the plans. Dangerous roads were overwhelmingly reported as a key issue amongst all postcodes and a cause for future concern pending the implementation of the plans.

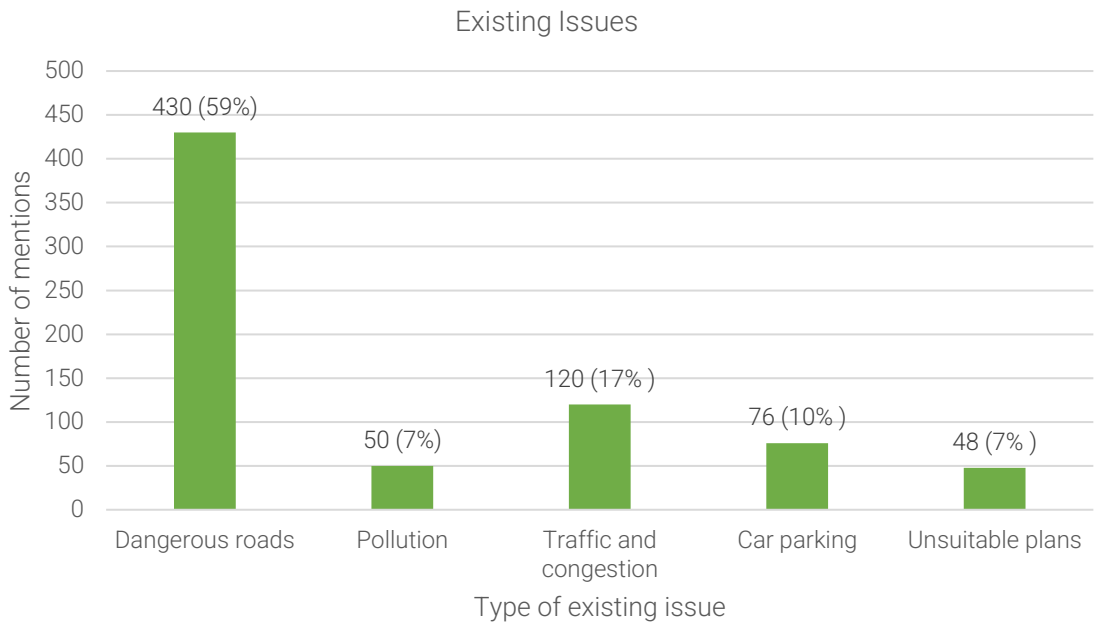
5.3.5 Issues were raised pertaining to dangerous roads including excessive speeding, dangerous drivers, dangerous junctions and rat running. Dangerous roads were identified 104 times in the N15 postcodes, with respondents identifying West Green Road, Broad Lane, Downshills Park and Tottenham High Road as key areas of concern. Some examples referencing this issue can be found below:

- *"One of the most dangerous routes to cycle in Haringey. There needs to be a segregated cycle going both directions. The road is certainly wide enough. You have to compete with dangerous, speeding drivers and bus drivers who it honestly feels like they want to kill you."* (N15)
- *"Cars use this road as a shortcut and drive extremely fast without taking due care with oncoming cyclists. The road is narrow due to parking on both sides, leaving little room for avoiding the oncoming cars."* (N22)
- *"Durnsford Road, all the way to Muswell Hill is very congested and unsafe for cyclist. Particularly the fact that it is a slope means cyclist have to go slowly and aggressive drivers make it very unpleasant and unsafe."* (N11)

5.3.6 The second most frequently mentioned issue was traffic and congestion. This has been identified as particularly prevalent in N15 and N6 postcodes. It was mentioned that existing traffic issues would be exacerbated with the implementation of the draft WCAP, particularly for residents living outside of the LTN boundary. There was also concern that added pressure will be placed on existing rat runs.

Some examples referring to traffic and congestion are as follows:

- *The High Street often has high traffic. This means high levels of pollution for roads that are used by children to get to school."* (N6)
- *"The main reason that cycling on Wightman Road is so risky is the sheer volume of motor vehicles more than 80% of which are through traffic […] there is no possibility of Wightman Road becoming a safe and desirable route for cyclists unless the through traffic is eliminated."* (N8)
- *"Traffic/Parking/Quality of life on Shelbourne Rd is not acceptable anymore. There are lorries going down this narrow road, rat runs, overgrown hedges, multiple white vans per household all just makes it a miserable environment. Shelbourne Road has to be a top priority for an LTN. This is unacceptable and cannot continue."* (N17)



5.3. Delivery Plan Interactive Map

5.3.7 Respondents demonstrated concerns the plans were unsuitable was mentioned substantially in N6. Comments pertaining to this issue related to the allocation of Wood Lane as an boundary road to an LTN, noting its current cycle route and congestion issues. Some comments included:

- *"This road should not be a "core route" for vehicles. It is a narrow residential road and should not be used as a cut through by inappropriate traffic. Pupils getting to local schools should walk or get public transport. Provision of specific bus services for local schools should be looked at as part of this project. There should be no need for parents to drive."* (N6)
- *"Wood Lane is already a traffic bottleneck - particularly at the lights heading towards Muswell Hill Road. Any measure that directs more traffic towards Wood Lane (in either direction) is no a well-though through idea. Wood Vale, Queenswood Road and Wood Lane should be a one-way road for traffic (from Cranley Gardens towards Muswell Hill Road)."* (N6)
- *"Why is Wood Lane being considered as a corridor between two LTNs when it's already weight restricted and a cycle route? This proposal makes no sense and is dangerous."* (N6)

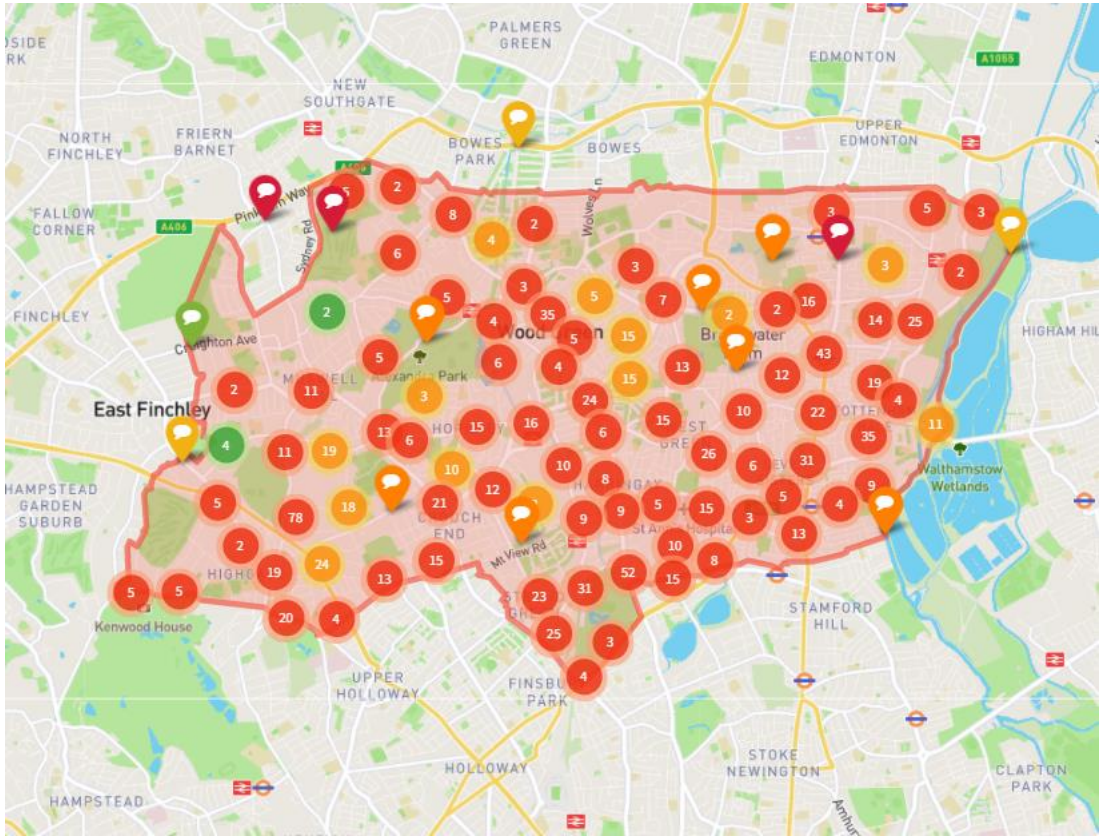


Figure 7: Screenshot of the Delivery Plan Interactive Map, as featured on the Commonplace map.

5.3. Delivery Plan Interactive Map

Suggestions

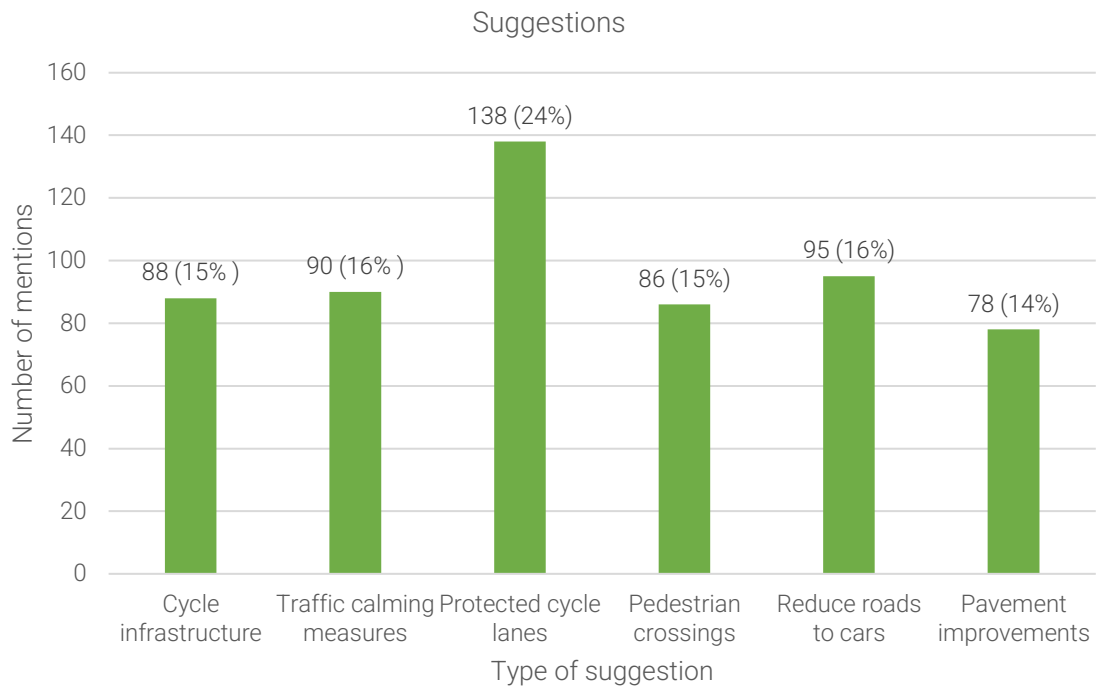
5.3.8 Respondents offered a variety of suggestions for the plans that can be broadly summarised into the following: cycle infrastructure, traffic calming measures, protected cycle lanes, pedestrian crossings, reduce roads to cars and finally pavement improvements.

5.3.9 The most popular suggestion was in relation to protected cycle lanes, this was the most common in the N8, N4 and N15 postcodes. Generally, respondents stated the benefits of protected cycle lanes would have on active travel would be worthwhile for cyclists and car users. It was also noted as having benefits for pedestrians, as it would ensure that cyclists would not cycle on the pavements in response to dangerous roads. Respondents provided examples of certain routes and roads where they would like to see the implementation of protected cycle lanes, some examples of which can be found below:

- *"Provide cycle lanes from the crossings to link up with the Midnight Alley cycle lane through Downhills Park."* (N15)
- *"Create a segregated cycle route on Shepherds Hill to encourage active travel amongst Highgate Wood pupils."* (N8)
- *"Endymion Road between Hornsey Gate and Green Lanes: very busy and very narrow road. Needs a physically separated cycle lane."* (N4)

5.3.10 The second most popular suggestion from respondents was to reduce roads to cars, with this being the most prevalent in the N6 and N17 postcodes. Those that called for this suggestion were generally most supportive of the vision, wanting more Low Traffic Neighbourhoods to be implemented in the area. Some examples of frequent comments regarding this suggestion can be found below:

- *"Close Wood Lane to through traffic as part of a LTN, it is completely unsuited to the traffic it has, let alone the rat run it will be if Shepherds Hill gets closed."* (N6)
- *"Cromwell avenue has become a popular cut through with a lot of traffic in rush hour - completely unwelcome for residents and those leaving local schools. It is a narrow road and should be blocked in some way, only accessible to residents."* (N6)



5.3. Delivery Plan Interactive Map

5.3.11 Traffic calming measures were identified as the third most popular suggestion - noted especially in the N8, N4 and N17 postcodes. Respondents stated the current roads are dangerous due to high levels of speeding. Therefore, they suggested the implementation of traffic calming measures like speedbumps and traffic cameras to make the roads safer for pedestrians and cyclists alike. Some respondents called for the implementation of a 20mph speed limit. An example of some of the responses in relation to traffic calming measures can be found below:

- *"This part of the Archway Road suddenly turns into a bit of a racetrack with cars going at high speed. Needs to be made more cyclist and pedestrian friendly with some traffic calming measures."* (N19)
- *"Plenty of cars seem to use Poynton as a cut through. There is a real need for better speed control, the existing speed humps do little to control the speed of some cars."* (N17)

5.3.12 Other suggestions included the implementation of additional lighting to make active travel safer at night. There was also particular mention in N17 for planting trees and improving the façade of the public realm to make it more appealing for people to engage in active travel.

5.3.13 As part of the Delivery Plan Interactive Map, participants were able to agree with specific comments made by other participants. The below comments are the five comments that received the most agreements on the map:

- *"A dedicated, separated cycle lane is desperately needed on Green Lanes."* (N8)
- *"Walking on Wood Lane is almost impossible because of the high volume (and high speed) of rat runners and the narrow pavements. Cars frequently park on the pavement while waiting for people coming up from the tube station. It's a nightmare for the mobility."* (N6)
- *"Walking and cycling on this road is a dangerous endeavour. Part of the road does not have a pavement on one side, forcing pedestrians to cross the road. However, there is not safe crossing, putting small children at risk. Cars also park on the narrow pavements, completely blocking it, again forcing pedestrians onto the road. This is especially risky for children and elderly people who are not able to react quickly to oncoming traffic. The road is narrow with cars frequently driving far above the speed limit. There are no deterrents to fast driving. Close the road to though traffic, allow only local traffic. Install parking bays on the road, and in all other places institute parking/stopping restrictions so no one parks on the pavement. Install deterrents to fast driving."* (N6)
- *"The WCAP document appears to show Wood Lane at the boundary between two proposed LTNs, implying that through traffic would not be allowed down, e.g. Shepherd's Hill, but would redirect down Wood Lane and Wood Vale. Wood Ln is already very narrow and cannot cope with yet more motorised traffic. It would make walking and cycling very unpleasant and dangerous."* (N6)
- *"Ban all parking on Green Lanes except deliveries and make the Ladder a low-traffic neighbourhood."* (N4)

5.3.14 As demonstrated in Figure 7, comments were received on the map across the Borough. However, a significant number culminated around the east of the Borough, particularly around Seven Sisters, Tottenham, Stroud Green and Wood Green.

5.4. CAN Digital Survey

Snap Survey

5.4.1 During the consultation process, a Snap Survey was hosted online by CAN Digital, a digital advertising agency, to capture information about existing and desired travel habits, and to ask people for the barriers to walking and cycling in the Borough. Once the individual completed the survey, they were encouraged to visit the Commonplace website and complete the full surveys that were hosted on the site.

5.4.2 The survey was completed by 706 individuals, the demographics are broken down at the start of the report. All questions asked were quantitative, the data is summarised below.

Why do you enjoy cycling or walking?

5.4.3 A series of options were provided for individuals to select from (multiple choice selection), and the table below provides the counts and percentages for each:

Why do you enjoy cycling or walking?	Count	%
Keeping Active	566	80.17
Exercise	526	74.50
Mental health reasons	409	57.93
Reduced travel cost	393	55.67
Reduced journey times	335	47.45
I don't enjoy walking or cycling	54	7.65

Figure 7: Responses to "Why do you enjoy cycling or walking?"

5.4.4 The options that emphasise the health benefits of active travel were those most selected. Only 8% of respondents said that they did not enjoy walking or cycling.

How do you travel currently in Haringey?

How do you travel currently in Haringey?	Count	%
Walk	615	87.11
Bus	481	68.13
Cycle	369	52.27
Tube	366	51.84
Car	326	46.18
Taxi	127	17.99

Figure 8: Responses to "How do you travel currently in Haringey?"

5.4.5 Most individuals who responded walk to travel around Haringey. More than 50% of individuals also stated they cycle. There was also high number of individuals who use public transport. Fewer than half of respondents use a car to travel around Haringey.

5.4. CAN Digital Survey

How would you like to travel in the future?

How would you like to travel in the future?	Count	%
Walk	587	83.14
Cycle	503	71.25
Bus	384	54.39
Tube	310	43.91
Car	241	34.14
Taxi	86	12.18

Figure 9: Responses to "How would you like to travel in the future?"

5.4.6 Walking and cycling were the two most popular means of travel when people were asked about how they would like to travel in the future. 52% of respondents currently travel by bike and 71% would like to do so in the future. This was the only mode of transport that saw such an uplift in the data.

What stops you from cycling or walking in the area?

What stops you from cycling or walking in the area?	Count	%
I don't have access to a bike	100	14.16
I can't store my bike safely	293	41.50
Unsafe - too much traffic	420	59.49
I prefer to use public transport or a car	108	15.30
Accessibility	52	7.37
Walking areas feel unsafe	188	26.63

Figure 10: Responses to "What stops you from cycling or walking in the area?"

5.4.7 When asked what prevents people from cycling or walking In Haringey, 60% of respondents said it is unsafe due to the amount of traffic. 42% also stated the lack of safe bike storage prevented them from cycling, which is a theme that has been drawn from all the feedback received.

Conclusion

5.4.8 There is a demonstrable appetite among of those living in the Borough to cycle more. Looking to the future, the favoured modes of transport are walking, cycling, and using public transport. This is favoured over the use of a car, with the data suggesting individuals will be willing to give up car use as their primary mode of transportation in the future.

5.4.9 However, the key barrier preventing people from cycling is safety and the same is true for walking. Too much traffic and a lack of bike storage means fewer people make the decision to cycle in the Borough. Combined with our findings elsewhere, action needs to be taken in the Walking and Cycling Action Plan to tackle this.

5.5. Public meeting

5.5.1 As part of the two public meetings, feedback from participants was collated and analysed. The key themes identified are found below.

Demographics

5.5.2 Demographic data was not collected on the individuals participating in the public meetings.

Public meetings summary

5.5.3 From the two public meetings, the most common theme in responses received was in relation to safety as a prominent concern for both cyclists and walkers and the need to improve roads or pavements. Suggestions to improve road safety for pedestrians and cyclists includes improved road/pavement surfaces, segregated cycle lanes to prevent pedestrians/cyclist collisions and increased road space for both users by reducing the number of cars.

5.5.4 Another common theme amongst participant's feedback was that they would like an established regular feedback loop between Haringey Council and the community on specific programme goals and funding initiatives, to monitor progress and be kept informed. One resident offered the following comment:

"You've mentioned you have a list of things you would like to do but are uncertain about what funding you will get. How will you keep us updated about that, as it would be nice to see how you got funding and what the next priorities will be?"

5.5.5 A number of comments raised throughout the public meetings were made in relation to specific locations within the Borough – ranging both in support of the plans and in opposition. Below are some examples of comments received during the public meetings that refer to specific locations:

Wightman Road

- *"I cycle along Wightman Rd and now it's more dangerous than ever due to traffic calming measures."*
- *"I have a q regarding Wightman Road – it has changed beyond recognition, designed to do something with the traffic there to slow the traffic. but as a cyclist I would never contemplate cycling there as there's no space, in the future it would need to be redesigned over again."*

Green Lanes

- *"So disappointed there wasn't a 'what is the aspiration for Green Lanes, Tottenham High Rd, and Finsbury Park' section."*

Finsbury Park

- *"One of your proposed cycle routes would be going through Finsbury Park, how will that be safe at night it's basically a no-go area in the evening. How will those cycle routes be safe?"*
- *"During Covid enormous pressure occurred on the path and walk and bridge at its southern edge into Finsbury Park had to be closed as it was not possible for people to remain 2m apart. We propose a much wider bridge at this point."*

Brownlow Road

- *"My experience is that little is done to address the 10,000 cars a day which use Brownlow - my understanding is that it will be addressed when the LTN is in place and I find this puzzling as the LTN will be crossed by Brownlow Road, so the only way to get across is through the Brownlow rd. Also very concerned about pollution."*

5.5. Public meeting

5.5.6 Some residents criticised the draft WCAP proposals for being inaccessible for disabled and elderly residents. One resident offered the following comment:

"Regarding equality impact assessment, there is a lack of consideration for those with disabilities. I have lung condition so I need a car and I must support relatives who need help."

5.5.7 Another key theme to arise from feedback was support for the draft WCAP and its ambitions to tackle the climate emergency. Some participants highlighted the issue of noise and air pollution in the Borough and several requests were received for Haringey Council to introduce an electric vehicle policy.

5.6. Email correspondence

5.6.1 As part of the engagement process, a dedicated project email address was shared and distributed on all project channels, and emails were collated for analysis. This was intended to provide respondents an opportunity to share their feedback throughout the engagement process. In total 90 emails were received.

Demographics

5.6.2 Demographic data was not collected on the individuals participating in the process through this means.

Email Summary

5.6.3 The emails received included a range of feedback from respondents, including overall feedback on the proposals, comments relating to specific sections of the draft WCAP, suggestions on what could be further included and comments regarding specific locations.

5.6.4 From the emails received, the most common theme in responses was that the proposals in the draft WCAP would increase congestion and pollution in other areas of the Borough, where plans were not proposed. One resident offered the following comment: *"These proposals are very poorly conceived: they will cause great disruption, they will increase emissions and traffic congestion, and are being introduced for the benefit of only 3% of the population, i.e.. those young and fit enough to ride a bike. Everyone else, those who use buses, the elderly and the less fit who rely on occasional car use will suffer great inconvenience, delays and diversion from their normal routes. Given the greater traffic miles and build up it will produce, it will also affect pedestrians and residents in general through increased pollution. The cycle lanes we already have are barely used, and slow down the buses, an essential public and collective service."*

5.6.5 Another common theme amongst respondent's emails were requests for an extended consultation period due to some residents being unaware the consultation was being undertaken.

5.6.6 Some respondent's emails requested Haringey Council consulted neighbouring boroughs and aligned approaches to cycle lane plans. Requests to consult with Barnet Council arose most commonly. One resident offered the following comment: *"Whatever proposals you make should be compatible with the equivalent proposals in Barnet."*

5.6.7 Another common theme was residents would like pathways in Haringey improved, to ensure Haringey's pathways are accessible and easy to use for all. Some residents have commented that the current pathway condition being too narrow and with imperfections, means they are not able or not comfortable with walking in these states.

5.6. Email correspondence

5.6.8 A significant number of emails received made comments to specific locations – ranging both in support and opposition to the draft WCAP plans. Below are some examples of comments received that refer to specific locations:

Shepherds Hill

- *"Plans to close Shepherd's Hill to traffic would clog the smaller residential streets nearby. That would increase air pollution on those roads where it cannot disperse as easily."*
- *"For example, Have the team actually worked out how much traffic uses Shepherd's Hill, and where it would have to go?"*
- *"The way the LTN has been drawn up, suggesting that this road, rather than Shepherd's Hill, will be the way to go between Crouch End and Highgate is extremely worrying. I am not someone who doesn't believe in setting up LTNs. I think they can be very useful, and am absolutely pro encouraging more walking and cycling in London. But quiet and narrow residential roads that are already struggling with the volume of traffic and where children and walkers are already in danger from car traffic, should not be turned into thoroughfares and I'm very worried about this."*

Queenswood Road, Wood Lane, Wood Vale

- *"I live on Wood Vale, in your map to become the sole route of crossing between Highgate and Crouch End. This is, I'm afraid, quite impractical since Wood Lane narrows down to a single lane (not one in each direction) and queues form already on a daily basis."*
- *"Wood Lane, Queenswood Road and Wood Vale are already very congested with much of the roads not able to function as two lane."*
- *"Wood Vale/Queenswood Road/Wood Lane isn't covered in a LTN, despite being a residential road, bisecting an ancient woodland (Queen's Wood), providing access to leisure facilities in Shepherd's Cot, already being a cycle route and being extremely narrow at the top (Wood Lane). Shepherd's Hill would seem to make more sense as a boundary road between LTNs."*

Southwood Lane

- *"Southwood Lane has been designated a cycle lane. How can you add a cycle lane when again this lane is too narrow in places for two cars to pass each other?"*
- *"The proposal to site a cycle track on Southwood Lane is completely misconceived. The Lane is already very difficult to navigate, with even standard size vehicles passing each other with difficulty, and the pavements are very narrow. Despite this difficulty it is a key route between Archway Road and Highgate Village. To impede this further will increase the risk of accidents and/or lead to congestion on (the much longer) alternative routes, with adverse effects in terms of emissions and pollution."*

5.7. Stakeholder correspondence

5.7.1 During the consultation process, the project team have received responses from the following organisations:

- National Health Service, North Central London CCG
- Liberal Democrat Group
- Transport for London
- Severe and Complex Needs Families Group (SCALD)
- Canal & River Trust
- Joint response from the following organisations:
    - Haringey Living Streets
    - Haringey Cycling Campaign
    - Friends of the Earth Tottenham & Wood Green
    - Muswell Hill Sustainability Group
    - Haringey Clean Air Group

We have also received feedback correspondence from Crouch End Neighbourhood Forum, Friends of Queens Wood and Connaught Gardens Residents. Responses from these groups have been analysed and included in the feedback analysis. The responses are also available to view in the appendices.

National Health Service

5.7.2 Comments were received that can be summarised as follows:

- Encouraging people to increase their physical activation, as a key focus of Haringey's Early Help and Prevention Programme and Haringey's Physical Activity and Sports Strategy.
- WCAP should include opportunities and changes that reflects the differing levels of need of Haringey residents.
- The inclusion of a map of community toilets available across the Borough
- Inclusion of community events and activities to encourage more sustainable travel.

Liberal Democrat Group

5.7.3 Comments raised by the Haringey Liberal Democrat Group consisted of concerns about the lack of funding, prioritisation and tangible goals detailed in the draft WCAP. The group also stated they would like to see an improved cycling culture, more focus on commuting and some concerns with the current process of bike hanger allocations.

Transport for London (TfL)

5.7.4 TfL stated they are supportive of the overall aims and vision of the draft WCAP, which align with TfL's own priorities. They would however welcome further explanation of how the proposals tie in with London's overall strategy for cycling and how the New Cycle Route Quality Criteria will be used to assess existing and proposed cycle routes in the borough. TfL also stated they would like greater consideration of the role of public transport, particularly the bus network, in the draft WCAP plans.

Severe and Complex Needs Families Group (SCALD)

5.7.5 A representative from SCALD argued that concerns of people with disabilities and their carers are being ignored in the draft WCAP and fail to consider the needs of those who rely day to day on access to motor vehicles. SCALD report that many of those they represent feel they have not been 'listened to'.

5.7. Stakeholder correspondence

Canal & River Trust

5.7.6 The Canal & River Trust express support for Haringey Council's draft WCAP and its vision. The Trust emphasise that all resources should be capitalised on to improve opportunities to walk and cycle and remove barriers, and as part of this aim Lee Navigation should be valued as a key active travel and leisure resource. The Trust note that some policy aims, including path design and lighting, is not appropriate in some locations due to the impact and restrictions on nature and biodiversity.

Joint response (Haringey Living Streets, Haringey Cycling Campaign, Friends of the Earth Tottenham & Wood Green, Muswell Hill Sustainability Group, Haringey Clean Air Group)

5.7.7 A group response from the above organisations states their support in the draft WCAP's intent and welcomes the application of the modal hierarchy and the overall direction of policies 1-5. The group requests that a series of priorities, investment plans and measurable goals are added to the plan, as well as an assessment of quality and type of intervention.

5.7.8 A full copy of the responses received from the above organisations has been included in this report in the appendices.

5.8. Pop-up sessions feedback

5.8.1 During the four pop-up sessions, that took place in various locations across Haringey, feedback on the draft WCAP was collected on post-it notes and marked on a map of Haringey. The comments added to the map throughout these sessions have been collated and summarised below:

5.8.2 A significant number of participants requested more segregated/protected cycle lanes in the Borough, with reference to Alexandra Park Road, Green Lanes and Tottenham Lane as key areas that need additional and/or improved cycle lanes. One participant stated the need for continuous cycle lanes, as part of this request.

5.8.3 Some residents commented that they would like further LTNs to be introduced, including several requests for an LTN surrounding the Haringey 'Ladder'.

5.8.4 Alexandra Park Road and Durnsford Road were identified as dangerous roads for walking and cycling, especially for those with young children, due to speeding and congestion.

5.8.5 Another common theme in respondent feedback were requests for reduced pavement parking, particularly on Green Lanes and Cresthort Road/Palace Gates Road.



6.0. Feedback summary

6.1 Based on all the feedback received, a feedback summary has been drawn:

- Respondent feedback indicates general overall support for the draft Walking and Cycling Action Plan (WCAP) and Delivery Plan. This being said, opposition to the proposals existed throughout the feedback received and some respondents remained unconvinced by the vision proposed.
- Of those seven key themes identified, the most frequently mentioned were improving accessibility, walkable places, cyclable places and investing in street space. Overall, tackling climate change and greener school travel appeared less frequently.
- The analysis has found that a key reason that prevented residents from engaging with more active travel included too many dangerous and inaccessible roads to pedestrians and cyclists in the Borough. Frequent reference was made to Green Lanes, Tottenham High Road, Wightman Road and Durnsford Road as key areas of concern.
- A key theme to arise in respondent feedback were requests for greater cycle and walking infrastructure, including improved road and pavement surfaces, more bike hangers in the Borough, more segregated cycle lanes and a review of current cycle and footpaths.
- Some participants were concerned the proposals, particularly the Low Traffic Neighbourhood (LTN) policy, would result in increased congestion and pollution in the Borough, especially in neighbourhoods surrounding LTN boundaries.
- Participants requested greater detail given to priorities, goals and funding in the plan, particularly in relation to the Delivery Plan.
- Strong views were expressed that the draft WCAP should include greater consideration and inclusion of those less able to participate in active travel or need further support, including disabled and elderly.
- Likewise, participants stated public transport is underrepresented in the current draft WCAP and should be more widely acknowledged as a sustainable mode of transport.



APPENDICES

Appendix: Response from NHS Haringey CCG

"Response:

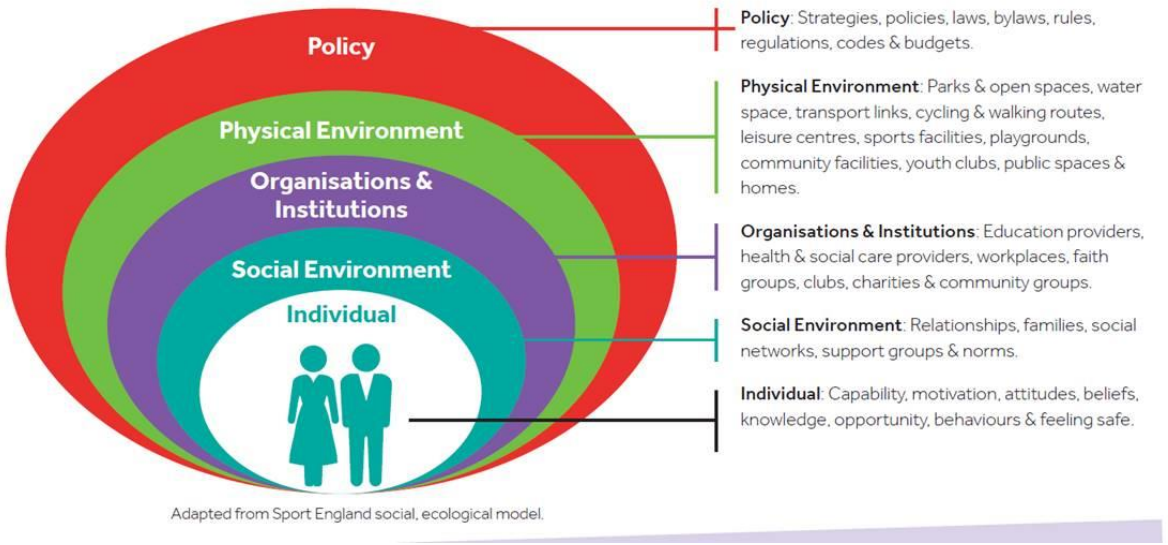
Firstly, we welcome the Strategy and the focus on encouraging people to become more physically active, including urban design to do so. We want to suggest a few areas where we think the Strategy could be strengthened through ensuring there is appropriate alignment between it and its resulting action plan and wider strategies focussing on physical activation amongst the population, including those groups who may find it more difficult to adopt healthy lifestyles.

Key points to add in

- *Encouraging people to increase their physical activation, whether by walking or cycling or other means in order to improve their mental and physical health is a key priority across the Haringey partners.*
- *It is a key focus of Haringey's Early Help and Prevention Programme and Haringey's Physical Activity and Sports Strategy. Increasing physical activation is also recognised as key in addressing long standing heath inequalities that exist amongst those from more deprived communities in Haringey.*
- *The approach we are developing is to understand how the differing needs of the population could be matched to solutions. Many people can be more physically active and are able to access a range of solutions and opportunities, including walks and cycling, for themselves – a 'universal offer'. However, we also know that some groups of people may need a some encouragement, help and support to become more physically active. We provide an example below of a multi-agency approach between the Council, NHS and voluntary and community sector to support older people.*
- *CASE STUDY: Haringey's Early Help and Prevention programme recognises physical activity as key in preventing ill health, and supporting people to age well. The programme aims to support people to become more physically active through a whole population approach that includes a universal offer for all, to a more targeted offer that is focused on supporting those who are less mobile for various reasons, such as a medical condition, to increase their physical activation. Across Haringey there are a number of initiatives that are either already underway or planned to support residents to become more physically active and fall into these universal or targeted categories. These initiatives range from universal offers, such as the Haringey wellbeing walks programme which is open to all Haringey residents and involves regular group walks at different park locations, to more targeted offers that might involve initially getting the individual to become more physically active in small ways, for example encouraging them to get to the end of their street or front garden. Supporting those who are less mobile to become more physical active is key to improving health and wellbeing outcomes, and addressing health inequalities.*
- *Haringey partners are taking a healthy neighbourhoods approach to tackle health inequalities prevalent amongst those living in the east of the Borough where the greatest deprivation lies. Developing a targeted physical activation offer which meets the needs of people who have a long term health condition or at risk of a long term condition is key to the healthy neighbourhoods approach. Coinciding with the Early Help and Prevention Programme, this involves developing an offer which meets the needs of those who are not mobile and making use of existing physical activity opportunities available, and ensuring these individuals are supported to take up physical activity as appropriate to help with the management of their condition. It is key that the WACP includes opportunities and changes that reflect the differing levels of need of Haringey residents and how those who might not be currently physically active will be encouraged to become active through the plan.*

Appendix: Response from NHS Haringey CCG

- *Haringey's Physical Activation and Sports Strategy – should also be referenced in appendix A with a blurb 'The vision of Haringey's Physical Activity and Sport Strategy is to create and embed a culture of activity so that Haringey becomes one of the most physically active and healthy London boroughs. We want to ensure that all of Haringey's residents have the encouragement, opportunity and environment they need to lead active, healthy and fulfilling lives. By working collaboratively and cooperatively, as a whole system, we will seek to transform attitudes and behaviours and make it easier for residents to embed physical activity into their everyday lives' The below diagram is useful to include either in appendix A or under making the case page 14.*



- *Both the Early Help and Prevention Programme and the Physical Activity and Sports Strategy recognise that behaviour change is fundamental to getting more people physically active, and people move through the behaviour change journey at different paces, face different challenges and require different levels of support. A diagram of the behaviour change journey is below. Both the programme and strategy put emphasis on identifying key touch points (e.g. in Health or social care setting, education settings) where we have the best opportunity to engage with residents in ways that will meaningfully and positively impact on their deliberate and incidental activity levels. We think changing behaviour is key to getting those residents who might not normally (e.g. due to a medical condition, low motivation) engaged with walking opportunities and making use of the changes proposed by the WCAP.*



(Source: Sport England – Behaviour change journey based on the Transtheoretical model of behaviour change)

Appendix: Response from NHS Haringey CCG

Other suggested additions

- *A suggestion was made to include a map of community toilets available across the borough in the plan, as toilet provision is key to encouraging people to get out and about. There is a map of toilets already on the council website at https://www.haringey.gov.uk/parking-roads-and-travel/roads-and-streets/public-toilets/map-public-toilets-haringey that you could reference or use.*
- *Add to Active Travel Projects on page 91*
    - *' Personal Travel Planning Project' – Annually 2 wards door knocking & various community events - aim to engage 5,000 residents to encourage 'pledges' to travel more sustainably; estimated annual cost £40,000 – unfunded*
- *Either under above on page 91 or Walking p83*
    - *'Walking Projects' – a series of annual events and activities (e.g. Xplorer an intergenerational fun orienteering activity, development of faith based walking groups etc) targeting inactive communities to encourage more walking; estimated annual cost £25K unfunded."*

Appendix: Response from Liberal Democrat Group

"I am writing in response to the current WCAP document that is out for consultation on behalf of the Liberal Democrat group in my role as Spokesperson for Environment and Sustainability.

Please find comments to various items listed throughout the document below. Some comments have reference to specific page numbers listed next to them in brackets.

I look forward to these comments being taken on board, and a revised version of the document presented - addressing the areas raised.

1. Unfunded Plans

This document contains plans for:

*34 cycle tracks, of which 32 **(94%)** are unfunded*

*25 LTNs, of which 22 **(88%)** are unfunded*

*8 walking schemes, of which 7 **(88%)** are unfunded*

*49 school streets, of which 29 **(59%)** are unfunded*

*4 cycle parking schemes, of which 3 **(75%)** are unfunded*

These unfunded schemes are proposed to be financed from further grants, mainly from TFL. There is no mention of what the plan will be if these grants don't come to fruition. There is no priority list associated to assess what the council may consider enough of a priority to do off its own capital spending. With TFL's current financial predicament, and Haringey council's poor record on bid winning, this entire document reads as more of a wish list than a serious plan for the future. This is despite the council recently finding an extra £30 million in spending for self-serving improvements to the Civic Centre, enough to cover every single unfunded plan in this document.

2. Lack of tangible goals and incremental goal points

Other than the plans already in action or set for funding all others have no fixed date or schedule. There should be set numbers of plans to be achieved each year, starting small but increasing as we get used to how they go.

There are several references to long term goals. Including 8.55 and most notably 11.17 which states "The vision for Wood Green is that it will become North London's most prosperous and green town centre" This is a long term vision that we can all agree with but the current situation is unsafe, highly polluted and congested with vehicles. It would be good to see plans to at least make it liveable in the short term rather than looking at long term dreams and aspirations.

This plan will only be successful if it leads to measurable change e.g. increase in percentage of children walking to school, improvement of air quality etc. particularly in terms of cycling. We note that currently only 3% of trips in the borough are made on bicycles. Given that 45% of the budget is proposed to improve provision for cycling there should be more detail on what future demand might be and a target set for an increase in cycling. Measurable impacts are critical to prioritise projects that will have the most impact.

3. False Impressions

The plan lays out (Page 38) several current routes which, beside some occasional painted pictures or signs, are unrecognisable on the ground as cycle lanes. For example Dukes Avenue in Muswell Hill. On many there is no segregation or even demarcation of sections for car and cycle.

This gives a false indication to residents that these routes are safe and, if anything, their inclusion causes more harm than good. They should either be removed from the diagram or a thorough explanation of their situation should be included.

Appendix: Response from Liberal Democrat Group

4. Improving the cycling culture

Section 1.9 contains an aim that "There will be high levels of cycling amongst residents from all backgrounds and communities in Haringey". This is an important point, as having a greater diversity of people engaging is good in and of itself, but may further encourage people from those backgrounds, therefore increasing the overall number of cycling journeys.

8.42 talks about addressing this but makes no references to how. We need specific plans and structures to address this issue, see point 7 on this list for an example.

5. Lack of focus on commuting

If this plan is to be successful in its aim to get people to turn away from cars and get on bikes then it needs to focus on commuting. There are several sections on leisure cycling but nothing (data on commute journey)

6. Removal of street clutter

Section 1.9 (Page 6) mentions the importance of removing street clutter. Our pavements are getting smaller and more restricted. This is caused by many things including parking pushed up half off the road or extra signage installed.

This creates a disaster for people with accessibility needs and needs to be rectified with a specific plan. If not in this plan then I would like to know that it is coming in a future, separate plan.

7. Little mention of e-bikes

Despite mentioning the difficult topography there is little mention of a simple solution, E-bikes. These can allow a greater variety of people to cycle, not only improving the overall number of non-car journeys taken but increasing the diversity of people who cycle.

This brings us back to point 5 on this list, improving cycling culture. It's vital therefore that we look at ways to improve uptake and advertising of e-bikes as an option. They are currently an option on the "Peddle my Wheels" scheme, more could be done to advertise this to people who may find benefit from e-bikes.

8. Bike hanger waiting list

Last summer Haringey responded to a freedom of information request asking about the number of outstanding residents on the bike hanger waiting list, stating there were 6000 people on the list. This document several times refers to 1000 outstanding residents requiring bike hangers (8.51). What is the reason for this disparity?

9. Bike hanger allocation

8.54 states that spaces are given based on users' needs, "Spaces in a bike hangar are allocated based on a priority system that considers each individual's personal circumstances". This seems to not be the case currently, I contacted the council last August about a resident with cerebral palsy, affecting his ability to balance and walk. I asked if his request could be expedited but it was denied and I was sent a stock response.

10. Low cost traffic calming measures

The document goes into detail on the need for LTN's and their importance but should make reference to low cost, simple alternatives that can be taken on, and removed if needed, easily. This can be trialled as a solution without the standard scale intervention of larger projects.

11. Commit to a minimum standard of cycle lanes

We echo the Haringey Cycling Campaigns calls for high-quality infrastructure. This includes light segregation, proper understanding of the situations around junctions and following best practice and guidance on design generally.

Appendix: Response from Liberal Democrat Group

12. Borough boundaries

The plan does not address the challenges of borough boundaries which may explain why so little is proposed on the edges of the borough. This action plan will only be successful if there are routes where residents want to go and some of these routes need to accommodate travel in and out of the borough. So using Highgate as an example this would be to Camden, Kentish Town and Hampstead and Hampstead Heath. Close collaboration with neighbouring authorities will be required.

***13.** Green Spaces*

As a borough we should be encouraging residents to use green spaces as much as possible, they are vitally important for health and wellbeing. Therefore pathways to green spaces should be covered in the plan even if these are for green spaces just over the borough boundary.

***14.** E-scooters*

The plan should commit to developing an e-scooter strategy to add to the plan when e-scooters become more established in London."

Appendix: Response from Transport for London

"Summary

Enabling more Londoners to get around by walking and cycling, rather than driving, is crucial to London's successful recovery as well as continued delivery of the Mayor's Transport Strategy. Making active travel safer, easier and more attractive is a priority for London, and TfL therefore welcomes the publication of Haringey's draft Walking & Cycling Action Plan (WCAP).

In summary, TfL is supportive of the overall aims and vision of the WCAP, which align with TfL's own priorities. We welcome the use of the Healthy Streets Approach, and the evidence-led methodology that Haringey have taken to identify future investment priorities for walking and cycling.

We would welcome specific mention of how the proposals tie in with London's overarching strategy for cycling, as set out in the Cycling Action Plan, including how Haringey's cycle network will connect into the wider Cycleways network, and how the New Cycle Route Quality Criteria will be used to assess existing and proposed cycle routes in the borough.

We would also welcome greater consideration of the important role of public transport. Walking, cycling and public transport are closely linked and the WCAP should form part of an integrated strategy that will support all of these modes.

In particular, the requirements of the bus network should be reflected in the planning and design of walking, cycling and Low Traffic Neighbourhood (LTN) initiatives. The development of a comprehensive bus priority network on main roads – which will enable walking and bring benefits for cycling as well – is a logical addition to LTN delivery on roads that will carry less through traffic. This will be crucial in supporting the 74 per cent of Haringey residents who use the bus on a weekly basis, as well as reducing car usage in the borough by attracting more bus passengers.

To support this, we would welcome the opportunity to collaborate with the borough on the development of individual schemes set out in the WCAP as they come forward.

Detailed responses to the fifteen questions posed in the draft plan can be found below:
Question 2: To what extent do you support the WCAP vision?
TfL welcomes Haringey's 2031 vision to see a shift to active travel by reducing motor vehicle use for shorter trips. This is consistent with the aims of the Mayor's Transport Strategy and the ongoing work of TfL to enable more people to walk and cycle for different journeys.
It would be helpful if the vision gave greater clarity regarding the 'walking and cycling are natural choices' aim by setting out the context for where Haringey is now and where it is aspiring to get to as part of this vision. For example, this could be in relation to everyday journeys, local trips and/or access to town centres, local neighbourhood services and onward travel options.

Question 3a: To what extent do you support Policy 1 – Increasing Active Travel?
Question 3b: What else should be included in Policy 1 – Increasing Active Travel?
TfL supports the aspiration to increase active travel and reduce dependency on private motor vehicles. Further detail could be given in this section on the role of active travel in relation to public transport as no mention is given to public transport connectivity. Public transport is a key driver of active travel, especially walking, and public transport journeys involve significant levels of active travel: for example, the average bus journey in London involves seven minutes of physical activity.

As Haringey has some of the busiest Zone 3 stations on the Tube network, including Seven Sisters and Wood Green stations, as well as recent upgrades to several Tube and Overground stations, the strategy should emphasise the role of good walking and cycling connectivity to these stations. Active travel for local trips, alongside the linkages it provides to wider sustainable transport options would be expected as part of this strategy.

Appendix: Response from Transport for London

Question 3c: To what extent do you support Policy 2 – Walking?
Question 3d: What else should be included in Policy 2 – Walking?
TfL supports the ambition to encourage mode shift from the car to walking and the focus on town centres, transport interchanges, schools and parks.

It should be noted that the use of the Planning for Walking Toolkit can apply more widely than accessibility considerations and the borough is encouraged to consider the full range of pedestrian design principles in the document to help identify key issues for walking across different situations, as well as the balance with other road users.

Question 3e: To what extent do you support Policy 3 – Cycling?
Question 3f: What else should be included in Policy 3 – Cycling?
TfL welcomes the plans to tackle key barriers to cycling, including infrastructure improvements, behaviour change, and complementary measures.

This section would however benefit from specific mention of connecting into the wider London strategic cycle network: the signed Cycleways network.

We welcome the application of the London Cycling Design Standards, but we would also suggest referencing the use of the New Cycle Route Quality Criteria here, to align borough design standards with the wider expectation for quality across the Cycleways network, and to ensure that new cycle infrastructure will address the road danger challenges identified in section 6 of the strategy.

Question 3g: To what extent do you support Policy 4 – Low Traffic Neighbourhoods?
Question 3h: What else should be included in Policy 4 – Low Traffic Neighbourhoods?
TfL is supportive of Low Traffic Neighbourhoods (LTNs). Studies show they can have a positive effect on safety, air quality, reducing car ownership, and creating appealing environments for walking and cycling.

These outcomes are aligned with the Mayor's Transport Strategy approach to reduce car dependency, achieve Vision Zero and enable more trips to be made by walking and cycling. We support Haringey's vision for a network of LTNs based on robust evidence and would
like to acknowledge the extensive engagement that the borough has done to date on current LTNs out for consultation.

This policy would be strengthened by explicitly recognising the need for LTNs to be delivered in an accessible and inclusive way to enable older and disabled people to engage in active travel.
It is also worth recognising that LTNs can impact both the Transport for London Road Network and borough road network through traffic reassignment which, in turn, can affect bus journey times. LTNs should therefore be carefully designed to mitigate any impacts on other users of active, sustainable and efficient modes in the area, working in close consultation with TfL. For instance, a logical complement to LTNs is a stronger bus priority network on the main roads between LTNs. This will offer better alternatives to car use, help cycling and enable more walking. We would be keen to work with Haringey to see the development and delivery of more bus priority.

While we agree with the general principle of prioritising Low Traffic Neighbourhoods where there is expected to be most positive impact, the deliverability and local appetite for change should be strongly considered when making the case for a scheme, particularly for the first wave of projects. We would recommend referring to the methodology set out in the Strategic Neighbourhood Analysis appendix:
https://content.tfl.gov.uk/lsp-app-six-b-strategic-neighbourhoods-analysis-v1.pdf

Appendix: Response from Transport for London

Question 3i: To what extent do you support Policy 5 – Re-allocating road space to enable sustainable growth and to make walking and cycling safer?
Question 3j: What else should be included in Policy 5 – Re-allocating road space to enable sustainable growth and to make walking and cycling safer?
Road space reallocation is central to the changes TfL is making to support 'Good Growth', improve safety for all road users and promote the use of active, sustainable and efficient modes of transport. The road space reallocation approach set out in the WCAP should be endeavouring to make all road users safer.

We welcome the proposed modal hierarchy – which clearly puts walking, cycling and public transport over general traffic – in line with the Mayor's Transport Strategy. It should be recognised that some flexibility in the modal hierarchy is considered on behalf of public transport for cases with substantial strategic need. The role of freight versus private traffic should also be considered within any modal hierarchy.

It is suggested that separate strategies could be set out in this section in relation to loading and freight compared to private car parking, to give greater consideration for the differences in parking and loading, and how space will be prioritised in town centres.

Question 4a: To what extent do you agree with the cases presented on the Economy, Inactivity, Air Quality, Climate Change and Social Justice?
Question 4b: Are there any other cases that should be included in this section of the WCAP?
This section articulates the case for walking and cycling and we would encourage the borough to refer to the Walking and cycling economic benefits pack https://tfl.gov.uk/corporate/ publications-and-reports/economic-benefits-of-walking-and-cycling for further information.
More could be said on equality and inclusion with regards to the challenges faced across different parts of Haringey. The focused data on inactivity and life expectancy variations across the borough is useful in highlighting these disparities.

Question 5a: To what extent do you support the identified priority areas for improving walking infrastructure?
Question 5b: Do you have any comments on our identified clusters with potential for increasing walking? Are there any walking routes / paths you would like included in the Action Plan?
It is suggested that this section is not entirely clear in relation to covering the existing conditions. While we welcome the use of the LTDS switchable trips data, data on walking collision and NO2 concentrations are referred to in this section but are not presented alongside the switchable trips so it is not clear whether the "identified priority areas" are based purely on the switchable trip data or other factors.

Furthermore it should be noted there is a lack of clarity on how the Walking for Leisure section feeds in to the identification of priority locations for investment.

It would be recommended, as this section is about showing Haringey today, to consider demonstrating existing walking demand. It might be that the consultation questions are the main issue here, setting the expectation that this section shows priority areas when in fact that comes later in the document.

Question 6a: To what extent do you support the council's analysis of the existing cycle network, including gaps in the network?
Question 6b: Are there parts of the existing cycle network not included in the plan which should be?
The approach of showing cycle network mesh density at 400m is welcomed; however it would be recommended to consider the condition of existing routes as not all of the signed routes shown would be expected to meet current standards of a high quality cycling route. Paragraph 5.4 appears to recognise this potential issue without stating this clearly.

It would also be useful to provide borough-level data to support the argument that cycling has increased in Haringey over the past 10-15 years, as the figures provided are pan-London. Links to data from neighbouring boroughs would also be welcome, to further evidence the growth and change in cycling patterns.

Appendix: Response from Transport for London

It is encouraging to see cycle parking mentioned in detail in this section, although there is a lack of detail with regards to the distribution across the borough. The Cycling Infrastructure Database (https://data.london.gov.uk/dataset/cycling-infrastructure-database) provides a reference point for mapping this information, and the Cycle Parking Implementation Plan (https://content.tfl.gov.uk/cycle-parking-implementation-plan.pdf) includes analysis of demand for cycle parking.

Question 7a: To what extent do you agree with the barriers to active travel identified?
Question 7b: What barriers have prevented you from walking or cycling?
A broad range of known influential factors in relation to active travel are shown, which are generally useful in highlighting locations that are problematic for walking and cycling. Collision data is shown up to 2017; more recent data is available on request and would be recommended for this analysis.
We would suggest including public transport accessibility in the analysis. This has been shown to be a barrier to walking where accessibility is especially low. Some parts of the borough are known to have relatively low public transport accessibility and this would be useful to emphasise in the action plan. Furthermore we would recommend consideration of land use and key trip attractors in the borough and to explore whether the infrastructure around specific land use types creates an especially problematic barrier for walking and cycling.

When poorly managed, kerbside activity can be a significant barrier to active travel as well as having negative impacts on the bus network and loading and servicing. The Plan would benefit from consideration of kerbside management measures that would improve conditions for walking, cycling and buses, while supporting efficient loading and servicing.
In terms of other barriers to walking, it would be useful to acknowledge that some of the areas with poorest air quality in fact have some of the highest footfall – around Turnpike Lane and Seven Sisters stations for example. While poor air quality can be a barrier – and may indeed be a barrier for some people in these locations – the distribution of trip attractors mean that these places remain busy.

Question 8a: To what extent do you agree with the identified future walking clusters and corridors?
Question 8b: Are there any future walking clusters and corridors not included which should be?
TfL welcomes the evidence-led approach to identifying walking clusters and locations. In particular, the Strategic Walking Analysis has been effectively used to identify walking clusters based on walking potential and trip attractors. It is not entirely clear why Tottenham Hale has been omitted in this analysis. The clusters and corridors approach is clearly defined, however the lack of connectivity between the Seven Sisters cluster and the Green Lanes cluster could be reviewed to ensure a borough wide connectivity approach for walking.

Furthermore, the role of green spaces in this plan is not entirely clear; reference is given to a green grid but it is not shown as to how this would relate to priority streets.

Question 9a: To what extent do you agree with the council's future cycling routes and the recommended cycle corridors?
Question 9b: Are there any cycle corridors not included which should be?
TfL welcomes the evidence-led approach to identifying future cycling connections. Use of the Strategic Cycle Analysis in conjunction with gap analysis has provided a good basis for informing recommended routes.

It should be noted there are a range of competing demands on London's roads, and the development of new cycle routes must also balance these. It is important to ensure that the alignment and design of new cycle routes supports bus and walking outcomes where needed. TfL has provided boroughs with a range of strategic datasets to support development of Local Implementation Plan proposals, including maps of priority locations for walking and buses. We would strongly recommend the use of these datasets as part of the evidence-led approach to planning the cycle network, particularly in understanding potential conflict and opportunities between the cycle network and other sustainable modes.

Appendix: Response from Transport for London

Question 10a: To what extent do you support the council's criteria-based approach for identifying future LTNs?
Question 10b: Are there any other criteria we should include?
Question 10c: To what extent do you agree with the council's assessment of vehicle evaporation and its case for LTNs?
TfL is supportive of Low Traffic Neighbourhoods (LTNs), and the criteria-based approach applied by the council is aligned to our Strategic Neighbourhood Analysis.

We are aware that LTNs can impact both the Transport for London Road Network and borough road network through traffic reassignment. Modelling of expected impacts will be an important part of the scheme design process, with TfL already working to anticipate network impacts from the proposed changes. Short-to-medium term impacts are an important consideration especially where experimental orders are to be used and so it is important to not assume traffic evaporation is inevitable in every location. Furthermore the impact on bus performance should remain a central consideration to the success of a LTN. We would support joint working in this space, to develop proposals for a strong bus network with adequate bus priority measures in parallel with implementing LTNs.

We would recommend consideration of how LTNs can complement plans for developing Haringey's cycle network. For example, new cycle routes could be unlocked and/or existing routes improved through the provision of an LTN. This may be a prioritisation consideration in certain situations.

Question 11a: To what extent do you support the active school run priorities?
TfL welcomes the introduction of a dedicated School Streets plan. It is suggested that more information is needed for this section to understand the scale of the challenge and the priorities in different areas and key information from the related plan would be helpful here.

Question 12a: To what extent do you support the active travel priorities?
TfL supports the overall ambitions and priorities set out in the Plan. We would welcome the opportunity to work with the borough to discuss the specific active travel proposals set out in this plan. A broad range of measures are proposed and further work is needed to understand how these will be prioritised. Most of the Cycleways and Low Traffic Neighbourhoods proposed in the Delivery Plan (Appendix C) are flagged as Red under Feasibility. It would be useful to understand how this has been scored and how this should be interpreted. We would also welcome more detail on how the collision analysis set out in section 6 of the document will be used to prioritise schemes for delivery, as part of delivering Vision Zero.

It is not entirely clear what is proposed with regards to Cycle Hire. More detail on whether it is wider rollout of the Santander Cycles scheme or dockless Cycle Hire would be helpful.
The references to cycle freight are welcomed, and we would encourage Haringey to consider whether any additional measures or references could be included in the final strategy to further support cycle freight in the borough.

TfL would welcome detailed discussions about how to manage "match day" events at the Tottenham Hotspur Stadium, ensuring buses, walking and cycling are attractive choices for people travelling in the local area on match days.

The monitoring proposals are broadly supported, however there is no mention of monitoring of cycling demographics.

Finally, community and stakeholder engagement and consultation are central to the design and delivery of delivering inclusive, high-quality improvements for walking and cycling, and the references to these throughout are welcomed. We would encourage the borough to also consider plans for working with stakeholders and communities to achieve new infrastructure and drive behaviour change, especially to achieve an increase in the number and diversity of people cycling in the borough."

Appendix: Response from the Severe and Complex Needs Families Group (SCALD)

"In all the controversy over Haringey's draft Walking and Cycling Action Plan the concerns of people with disabilities and their carers are being ignored. The loudest voices appear to be those of the cyclists (who account for 3% of journeys in the borough) – and those who object to their 'arrogance' and lack of respect for other road users.

Cllr Mike Hakata claims that the plans for more cycle lanes, road closures and 'low traffic neighbourhoods' will make the borough 'safer, healthier and greener'. Well, not for us! Many people with both physical and learning disabilities cannot just 'get on their bikes'. Some are unable to walk more than a short distance. They rely on cars and minibuses and many are unable to use public transport. The wave of traffic restrictions already introduced have caused difficulties in gaining access to vital services – GP surgeries, hospitals, shops – as well as causing increased congestion and delays.

A recent survey by Transport for All revealed that 77% of people with a range of disabilities took a negative view of LTN schemes across London. They reported longer journey times, that were 'exhausting, expensive and difficult'. Many also complained about the inadequate consultation and their perception that they had not been 'listened to'. In Haringey they are still not listening."

Appendix: Response from Canal & River Trust

Proposal: Haringey's Draft Walking and Cycling Action Plan (WCAP)

Thank you for your consultation.

We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Trust is a statutory consultee in the Development Management process.

The Trust owns and maintains the River Lee Navigation within the London Borough of Haringey. The towpath of the River Lee Navigation provides a strategically important north-south walking and cycling asset within the borough, and East London more generally. It connects existing centres of population, regionally important development opportunities (such as Tottenham Hale, Meridian Water and the London Legacy area) and the wider green and blue infrastructure network of the Lee Valley Regional Park. We know from our monitoring of towpath use that the Covid 19 pandemic has resulted in significant increases in people using our waterway network for recreation and access to nature, especially in dense urban areas where access to private and public green space is severely limited. Our monitoring shows that towpath usage at Tottenham Hale increased by approximately 130% during the Spring/Summer lockdown of 2020.

The Trust supports the Council's draft Walking and Cycling Action Plan and its vision to improve walking and cycling infrastructure provision to enable people to walk and cycle more, improve their health and wellbeing, have access to cleaner air, and reduce the impact on the environment. We support the Council's aims through this action plan to address issues experienced in the borough and more widely on the Economy, Inactivity, Air Quality and Climate Change and Social justice.

Given the scale of the challenge to introduce a cycling culture and increase walking journeys, every asset and resource will need to be capitalised on to improve the opportunities to walk and cycle as part of everyday activities and to reduce the barriers to people choosing to walk and cycle.

The Lee Navigation should be valued as a key active travel and leisure resource to enable residents of Haringey and visitors to the borough to walk and cycle in a traffic-free environment and connect with nature on their doorstep.

The Vision

We note the following points from the Council's vision:

1.8 People walking

- *The borough will be easy to get around on foot, including improved signage and wayfinding*
- *Street lighting will be of high quality throughout the borough*

1.9 People Cycling

- *We will have an extensive network of attractive and safe cycling routes covering all parts of the borough*
- *Wayfinding and signage will make it easy to cycle in Haringey*

We support the provision of coherent wayfinding and signposting both along the Lee Navigation but also to connect to and from neighbouring residential and commercial areas and connected green spaces.

It should be noted that lighting canal towpaths may be appropriate in some locations but, due to the sensitive nature of the waterway environment, design of lighting needs to take account of impacts on biodiversity, maintaining dark spaces for nature, the practical limitations of providing light where there is not typically a power source and ensuring that any lighting is genuinely beneficial to user safety. The Trust does not typically provide and maintain lighting on towpaths and would need financial support to do this, for example from a local highway authority. Alternative technologies may be more suitable to enable people to safely use the towpath outside of daylight hours, however it should not be inferred that a lit environment is a safe one, and lighting proposals need to be assessed for suitability on a case by case basis.

Policies 2 and 3

We note that policy 3 states that:

> E. Haringey will design cycle friendly streets and spaces which, as a minimum, meet the London Cycling Design Standards and the new national cycling infrastructure design standards, including the requirement to deliver streets which are coherent, direct, safe, comfortable and attractive.

On canal towpaths, path design for cycling is not necessarily required to meet the standards of DfT's LTN1/20, and may not be able to do so due to space, operational and design limitations, but the towpath should not be discounted from providing safe, comfortable, attractive, traffic-free cycling infrastructure as a result. The towpaths are able to provide highly valuable, high quality traffic free routes for cycling and walking, allowing people to access and connect with nature and water, which we know to have considerable benefits to health and wellbeing.

Appendix: Response from Canal & River Trust

Section 4 – Walking in Haringey Today

We suggest that the Lee Valley and Lee Navigation are highlighted as key destinations/resources for residents of Haringey and visitors to the borough within the 'walking for leisure' section.

Section 5 – Cycling in Haringey Today

We suggest that the existing cycle routes graphic key and the text referring to it below on p20 notes NCN1 as Lee Navigation towpath as well to highlight the green space context of the route.

We note that this section states:

> "Whilst cycling for leisure often involves a ride through green space or quieter streets the conditions need to be right on these routes in the same way they need to be on a busy commuter route."

We would agree with this, whilst noting that what constitutes the 'right conditions' may not be the same (see our point above in relation to the DfT's Design Standards). We would also note that people do use "leisure routes" for commuting and other daily activity as well, so these routes have importance in terms of travel as well as leisure.

8 Cycling in Haringey in the future/WCAP delivery plan

We note that the Strategic Cycle Analysis (SCA) highlights the Lee Navigation NCN1 as a route of "Medium" future demand, reflecting the future increase in demand from residential and commercial development around Tottenham Hale and also outside the borough up and down the Lee Valley, particularly at Meridian Water just over the borough boundary. However, overall the cycling network gap analysis does not at present highlight the Lee as a high priority for future improvements in the context of the rest of the borough. We suggest that this should be reconsidered. We note that the Tottenham Area Action Plan does seek to secure improvements to these connections.

Given the wider benefits of the Lee Navigation route as a green and blue space supporting health and wellbeing beyond simply as an active travel measure, we want to work with the Council and developers to improve the route to encourage as wide a variety of people from the borough to be able to make use of it as possible, as an important north-south connecting green route (despite being on the edge of the borough). Appropriate improvements could include surfacing, access and wayfinding improvements. In particular, the section of towpath between Ferry Lane, Markfield Park and Craven Park Road on the boundary with Hackney is a high priority for improvement for visitors to the canal and we hope to be able to work with the Council's support to make a difference to this stretch of the towpath. We would welcome this as an addition to the WCAP delivery plan, to improve the surfacing, access and wayfinding to the towpath between Craven Park Road and Ferry Lane, and also from Stonebridge Lock to Chalk Bridge at the border with Enfield.

We also welcome the intention to improve links and connections between green spaces, in particular addressing some of the barriers that discourage people from venturing to make use of the Lee Valley and Lee Navigation from the west within the borough. We are already working with officers through our joint working group with the Council and the Lee Valley Regional Park Authority and look forward to progressing solutions to improve access to this valuable resource.

Appendix: Joint response from Haringey Living Streets, Haringey Cycling Campaign, Friends of the Earth Tottenham & Wood Green, Muswell Hill Sustainability Group & Haringey Clean Air Group.

"We welcome the publication of this document and its intent to transform Haringey into 'a borough where walking and cycling will be the default choice of travel'. An ambitious, coherent and implementable plan is critical to urgently tackling the climate emergency, enabling residents to lead healthy, active lives and supporting the sustainable delivery of new homes in the borough. In particular, ***we strongly welcome the application of the modal hierarchy proposed, and the overall direction of policies 1-5****.*

However, to turn this plan into a reality, ***we believe the document needs to be much clearer about what needs to be delivered, where and when****. While the analysis provided is valuable, it should be provided in a supporting evidence document or an appendix, while the action plan should focus more on what action will be taken. In particular,* ***the document should set out****:*

*• **The Council's short, medium and longer-term priorities for walking and cycling improvements across the borough**: While the indicated level of ambition is strongly welcome, it is not currently supported by a clear sense of where delivery needs to start. While walking measures can be hyper local, the WCAP should do more to identify specific interventions, both within the identified 'clusters' and outside of them. LTN and cycleways maps should be prioritised e.g. with differentiation between top, high and medium priority schemes. This should make it clear for all on which streets the Council intends to deliver change, based on their high-level feasibility, needs of different modes and conversations with TfL and local stakeholders. Suggested Map 1 below gives an example of how this could be done for a borough-wide cycle network. The WCAP should include a similar map based on the Council's assessments and stakeholder views.*

*• **The Council's short, medium and longer-term priorities for walking and cycling improvements across the borough**: While the indicated level of ambition is strongly welcome, it is not currently supported by a clear sense of where delivery needs to start. While walking measures can be hyper local, the WCAP should do more to identify specific interventions, both within the identified 'clusters' and outside of them. LTN and cycleways maps should be prioritised e.g. with differentiation between top, high and medium priority schemes. This should make it clear for all on which streets the Council intends to deliver change, based on their high-level feasibility, needs of different modes and conversations with TfL and local stakeholders. Suggested Map 1 below gives an example of how this could be done for a borough-wide cycle network. The WCAP should include a similar map based on the Council's assessments and stakeholder views.*

We have summarised the changes to the document we wish to see in Appendix 1 below, and set out our full comments in Appendix 2. We would be happy to discuss further any points raised in this response.

We also would like to comment on the Council's** proposed budget **on which it is currently consulting. As the online survey does not allow for organisational submissions, please treat this paragraph as our formal response.* ***The budget must align with the ambitions of the WCAP if these plans are to be meaningful*. As drafted, we strongly welcome the proposed £8m spend on road casualty reductions but are alarmed by the proposal to spend more than twice this (£20m) on "investment in highway assets." We request a breakdown of how much of this would be for resurfacing road space for cars compared to improving pavements, crossings etc., as well as more detail on the legal requirements[1] and economic benefits[2] used to justify this decision."*

Appendix: Response from Crouch End Neighbourhood Forum

"I welcome the publication of the draft Walking and Cycling Action Plan and believe a successful implementation of active travel policies to be of great significance to the future of the borough. The comments below are, as one would imagine, largely reflective of the current situation in Crouch End.

Please note, the Crouch End Neighbourhood Forum has not run a consultation regarding Haringey's paper, therefore any views expressed here have emerged as a consequence of commentary on transport issues contained in the CENF blog (crouchendforum.org.uk), as a result of participation in the aborted Liveable Neighbourhoods scheme for Crouch End (Liveable Crouch End), and through a transport survey into local views carried out in 2018.

Previous consultations support the view that there exists a good deal of local support for the WCAP vision, though the elephant in the room is that if any intervention impinges on the supremacy of the car Haringey may expect political pushback. Regardless, the setting out of a clear transport hierarchy, with the pedestrian/pavement user prioritised is to be welcomed unequivocally.

The idea of 'place' is often insufficiently drawn in Transport and Highways planning, but should be paramount: places are preeminent destinations and therefore govern movement. It follows that the design of transport networks should always include a consideration of why and where people travel, and include an assessment of the impact on local communities. The functioning of the town centre is particularly important. Creating an attractive public realm which draws in visitors and encourages them to spend more time at a place is key to supporting and increasing the viability of the local economy, civic values, and wellbeing.

Alas the current situation, at least in Crouch End, is far from such ideals and the design of the central road network, laid out in the 1970s, is wholly predicated on maximising an unfettered flow of motor traffic – confining the pavement user to dangerously narrow, cluttered, and under-maintained footways; inconvenient or non-existant crossings; and providing virtually no public spaces, seating or greenery. Squeezing a huge amount of through traffic into what is still essentially a medieval network of routes is of lasting damage to the town. Compared to the ambitions expressed in the paper things could hardly be worse and a huge amount needs to be done.

The understanding of the role played by placemaking is perhaps a weak point of the document.

The relative value and potential for conflict between walking and cycling is a subject often avoided. It is noticeable throughout the document that the chief consideration is cycling rather than walking: for every page on walking there are 3 or 4 on cycling. Given that walkers outnumber cyclists 30 to 1, and that walking is apparently meant to be the highest priority this is unacceptable. Although cycling has clear and significant potential benefits to both the individual and the environment, it is observed that while a doubling of cyclists would still leave the mode as a minority activity, a doubling of pedestrians would be transformational. Indeed, the evidence base presented for cycling contains rather elevated claims, for example 3.4 is predicated on increasing cyclists by between 500% and 1,250%. Where is that even close to happening?

Policies

There is strong support for increasing active travel and for the 'healthy streets' approach. The role of infrastructure improvements is critical: improved localities will drive active travel and vice versa. The enhancement of the local economy is equally key – and should be identified.

Appendix: Response from Crouch End Neighbourhood Forum

It is the case that the implications of policy are probably not sufficiently clear, and objectives such as 'reducing traffic volume' or 'reducing parking availability', however contentious, could be spelt out. Low Traffic Neighbourhoods, conversely, seem too easily portrayed as anti-car.

Policy 5, the Re-Allocation of road space, is of paramount importance. The transformative potential, both for active travel and local town centre economies is substantial, the opportunity for traffic calming obvious, and the visualisation of re-designing significant roadways and junctions inspiring. This is of far greater significance than Low Traffic Neighbourhoods – and, as exemplified by the TfL Liveable Neighbourhoods initiative, road space can be allocated with multiple benefits, for greening, tree-lined boulevards, the creation of public spaces, and improved economic activity (eg. pavement cafés).

It is greatly disappointing in the remainder of the document that Policy 5 receives so little attention: unlike walking, cycling and LTNs, the reallocation and the redesign of major roads and junctions has no devoted chapter; and in the delivery programme no projects of town centre infrastructure interventions are identified – unlike cycle routes or LTNs.

Walking

The ambition for increased walking is well supported.

However, it is unclear what purpose the document's identification of walking clusters and corridors is designed for. Walking, of course, is not an aimless activity, but usually for specific purposes, for accessing services or shopping for example. It follows that the greatest improvements will be engineered by creating more attractive and useful destinations (particularly if one cannot drive or park easily). The rationale for favouring certain back street walking routes over others isn't clear. All routes are necessarily walking routes and should be treated accordingly. The most important walking areas are those in town centres, where footfall is by far the greatest.

It remains the case that in Crouch End the pre-eminent barrier to increased levels of walking is the dominance of heavy traffic on the main routes, and the resultant degradation of the local environment (the noise, dirt, and danger). The barriers to movement for children, the disabled, and others who need extra space and time, should be addressed. The poverty of footway widths and the inconvenience and questionable safety of road crossings are very apparent. Road danger is an issue and a number of local black spots for pedestrians exist.

The identification of key deliverables would therefore be of greater utility. This includes the improvement of pavements as an overiding issue, suitable for the pavement users sitting astride the apex of the proposed hierarchy. Wider footways of minimum widths, accessible for all, with improved surface materials, better maintenance (fewer uneven pavements), are necessary and a list of prioritised pavement widening projects should be established and set out in the delivery programme (for example, Crouch End town centre footway widths are often 2m or less wide, a mere 1.2m on Crouch Hill – an 'A' road with a bus route). A list of new and more convenient crossings may be added.

Issues of crossovers, pavement parking, pavement clutter, and the new challenges of electric vehicle charging cabling, and discarded electric cycles and scooters, could also be addressed – and raised tables, pavement build-outs, continuous footways, more visible junctions for informal crossings, scramble crossings, re-phased traffic lights, etc., should be on the shopping list.

Add to this the public realm improvements identified above, the seating, greening, public space, pavement cafés, and so on.

Appendix: Response from Crouch End Neighbourhood Forum

Cycling

The creation of new cycle lanes and routes is well supported.

Many aspects of cycling are self-evidently desirable, however the designation of certain routes presents real challenges:

The mooted Crouch End Hornsey Cycleway possesses three sections of route where the roadway is of insufficent width for either protected or unprotected cycle lanes. These must be addressed before support could be given. In particular we do not agree that this route can be presented as segregated lanes along the central Topsfield Parade and Broadway Parade sections of Tottenham Lane. Any intervention within the central section should be pedestrian first: the pavements are completely inadequate and for the health of the town centre must be widened as the highest priority. To do otherwise would have a regrettable negative impact on any chance of improving a run down, underperforming section of Crouch End centre. We believe cycling alternatives exist, as do additional routes. In addition, the CE cycle way also doesn't appear to go anywhere, it just peters out on Crouch End Hill?

The suggested route Crouch End to Stroud Green would have to proceed along the very narrow Crouch Hill (and its gradients), we're not sure how this could be done.

Quietway 10 is further advanced in delivery, but I have no idea why this route is directed up one of the steepest hills in North London (Uplands Road). Alternatives? Indeed, the gradients of the Northern heights appear not to be prime consideration generally – surely some routes could be designed to take this into account?

The need for secure cycle parking and cycle hubs is supported. Two locations have been suggested to the Forum. Firstly, outside Hornsey station (see comments below), secondly near Hornsey Library. It may be desirable to relocate existing cycle stands that cause an obstruction to footways.

Notwithstanding its considerable value for individuals, it is very difficult however to see how, with such small numbers, cycling alone would in any measurable way benefit businesses. The evidence supplied by TfL is not convincing in this regard. We note that faced with a push back from businesses who fear the loss of car-borne trade, the only logical response is to cite an increase in pedestrian footfall as a consequence of public realm improvements.

NB: The document maps contain this short route. It doesn't exist on the ground, and as far as can be ascertained, never has.

Low Traffic Neighbourhoods

As mentioned above, LTNs are quite divisive. Nevertheless it is arguable that this issue is much overblown and that while many of the benefits are contestable – many of the disbenefits are equally overstated.

Crucially however, many of the 'boundary roads' are in fact local High Streets, and the potential impact on local economies is real. This has to be addressed in policy and delivery.

Some LTNs may be supportable, though the evidence in Crouch End (traffic counts, etc.) suggests they are of secondary importance and that, save a few specific cases, rat-running may be manageable through more targeted interventions. The nature of the converging roads upon the Broadway make the design of LTNs difficult.

Appendix: Response from Crouch End Neighbourhood Forum

The LTN map (p50) is carelessly drawn, and suggests the three Crouch End LTNs will close the following to through traffic: Crouch End Hill, Middle Lane, Ferme Park Road, Shepherds Hill, and Stanhope Road. I note in particular that Crouch End Hill is an extremely busy A road, perhaps the busiest outside of the A1 in the west of the borough. The map also fails to identify the existing cell between Park Road and Middle Lane. A more considered, sensible, and less needlessly provocative suggestion should be made, or none at all.

School Streets

School streets are well supported, though the evidence that they make a significant difference to behaviour is scant. It is arguable that they are simply an easy option and will fail to provide the far reaching improvements the Action Plan desires.

Other comments

Planning

Regarding Section 11, the use of the planning development management system to delivery walking and cycling improvements is well supported. However, the importance of public transport, especially local buses, should not be overlooked and appropriate infrastructure should also have a call on available funds.*

**11.57 Public transport – this only mentions improving connections with cycling. Why? Surely the chief point of public transport is to carry people who then walk.*

Further transport corridors

We concur that an additional corridor in the future could connect Crouch End along Tottenham Lane to Hornsey Station. Hornsey is an impoverished station with great connective potential across the west of the borough, and could be the location for a transport hub connnecting rail, bus and cycling provision in the locale.

Street trees and planting

Regarding 11.47: The principle purpose of greening is not bio-diversity or pollution control – it is to provide an aesthetically attractive environment. This understanding is a basic requirement – if places are attractive they encourage more people to visit and walk.

A further use of trees maybe to improve kerb side spaces via on-carriageway planting to break up parking on back streets. They may also be used to form green central reservations and boulevards.

The lack of prior consultation was somewhat disappointing, though the Crouch End Neighbourhood Forum are of course happy to contribute as policy and delivery progress."

Appendix: Response from Friends of Queen's Wood

"The Friends of Queen's Wood are a voluntary association of local residents which assists Haringey Council in looking after Queen's Wood. This is an area of ancient woodland and is protected as a nature reserve. We undertake conservation tasks, provide educational and community events in the wood and monitor developments which may affect the ecology or amenity of the wood.

As such, we have no direct interest in the main proposals in the draft action plan, but support the overall aims of improving the environment and combatting pollution and climate change. There is, however, one detailed proposal which could affect Queen's Wood adversely. It is proposed to create two Low Traffic Neighbourhoods where through car traffic would be banned, separated by Wood Lane/Queenswood Road/ Wood Vale which would become the only through route for vehicles, including heavy lorries, between Crouch End and Highgate. This road goes through the heart of Queen's Wood and if the proposal were implemented, it would be likely to cause a substantial increase in traffic through the wood, with consequent noise and air pollution. It would create a safety risk for pedestrians, including many children, crossing from one side of the wood to the other, also affecting those using the key walkers' route of the Capital Ring. In addition, it is probable that the parking spaces along Queenswood Road, which enable users to visit it and benefit from exercise and the natural environment, would have to be removed to enable through traffic.

This would cause significant detriment to the amenity of the wood and be a most unwelcome blight on a natural open space which is highly valued for its peace and quiet in the middle of an urban area. We would ask that the scheme should be amended to give Wood Lane/Queens Wood Road/Wood Vale at least as much protection from increased traffic as surrounding roads."

Appendix: Response from Connaught Gardens Residents

"Cycle Lanes

In our area the roads being proposed for cycle lanes include:

- *Muswell Hill to Highgate via Muswell Hill Road and Southwood Lane*
- *Shepherds Hill and Worsley Road*
- *Muswell Hill to Bounds Green via Alexandra Park Road*
- *Archway to East Finchley via the A1 Archway Road*
- *Fortis Green from Muswell Hill to East Finchley*
- *Woodside Avenue*
- *Muswell Hill to Turnpike Lane via Priory Road*

All these proposals relate to roads that are not wide enough to facilitate bike lanes (Southwood Lane is clearly ludicrous) and will cause massive congestion, inconvenience and pollution for the sake of cyclists representing just 3% of road users. Buses will be delayed, because they aren't allowed to use virtually empty cycle lanes as has been the case in the High Road north of East Finchley. In addition, shops will be suffering because of difficulties in parking for deliveries.

Over the last 25 years traffic volumes have reduced significantly in London, but congestion in London is now apparently the worst in the world. It has worsened because one-way streets have been removed and roads and junctions have progressively been narrowed.

These latest proposals would seem to just make things even worse. They are also discriminatory against families, older or disabled population who are unable to cycle particularly living in such a hilly location.

Low Traffic Neighbourhoods (LTN's)

It would become illegal to drive across any LTN in Haringey with all through traffic confined to a limited number of "main" roads. For example, there would be no route between Archway Road and Highgate High Street all the way between Archway Bridge and Southwood Lane nor any route linking Crouch End and Highgate except for Wood Lane. Shepherds Hill would be closed to through traffic. The northern part of Wood Lane is very narrow and vehicles larger than cars have difficulty passing. For this to be the one route between Highgate and Crouch End does not stand up to serious consideration and one wonders whether the proposers of the Draft Plan have visited the roads concerned.

In summary it is hard to conceive a worse unconsidered collection of proposals, that in a stroke will bring Haringey into total gridlock and bring benefits to no one, including pedestrians and cyclists. I strongly object to these plans.

The publicity for such an important consultation has been very poor and has taken place over Christmas in parallel with the CPZ proposals, when people have other things to think about. In attempting to take part in the recent online consultation on 6 January, it transpired that Haringey had sent out the wrong link, so it wasn't possible to attend.

Very few residents in our area seem to have been consulted and nothing about it has been included in recent editions of Haringey People, which of course goes to every household.

As it stands the consultation process has been totally inadequate and flawed. I commend that the consultation period be extended and properly advertised to allow more time for consideration."

Appendix: List of stakeholder groups contacted

Alexandra Park School
Arachne
Assemblies of God
Blue Yonder
Bounds Green & District Residents' Association
Chestnuts Primary School
Coldfall Wood
Community Transport Waltham Forest
Diabetes Haringey
Disability Action Haringey
Disability Rights UK
Enterprise for London
Environment Agency
Filey Properties
Finsbury Park Synagogue
Friends of Alexandra Park
Friends of Brunswick Park
Friends of Lordship Recreation Ground
Friends of Queens Wood
Friends of the Earth
Fusion Lifestyle
Grant Shapps MP, Secretary of State for Transport
Groundwork London
Hackney Co-operative Developments
Haringey Chinese Centre
Haringey Climate Forum
Haringey Cycling Campaign
Haringey Friends of Parks Forum
Haringey Library Services
Haringey Living Streets
Haringey Over 50s Forum
Haringey Phoenix Group
Harringay online
Harris Primary Academy Philip Lane
HCT Group
Highgate Shul
Historic England
Homes for Haringey
Homes for Haringey
Hornsey Historical Society
Hyland House School
Kaotic Angels
KEEN London
LDBS Academies Trust
Living Under One Sun
London Ambulance Service
London Borough of Barnet
London Borough of Camden
London Borough of Enfield
London Borough of Islington
London College of Communication
London Fire Brigade
London Grid for London
Lordship Lane Primary School
Markfied
Mayor of London
Met Police
mhs homes
Muswell Hill & Fortis Green Association
Muswell Hill Synagogue
National Enterprise Netowkr
Natural England
NCT Haringey
North Harringay Primary School
North London Chamber of Commerce and Enterprise
North London U3A
Park View
Pembury House Nursery
Pinkham Way Alliance
Queens Road Traffic Group
RISE Projects
Sacred Heart of Jesus Catholic School
Salvation Army
SBWA

Appendix: List of stakeholder groups contacted

Seven Sisters Primary School
St Ann's Church
St John Vianney Catholic Primary
St John's Deaf Club
St Martin of Porres Catholic Primary School
St Mary's RC Primary School
St Synagogue
StART Haringey
Stroud Green Women's Institute
The Alexandra Women's Institute
The Bike Project
The Bridge Renewal Trust
The Business Lounge
The Community Hub
The Federations of Small Businesses
The Guardian
The Highate Neighbourhood Forum
The LTDA
The Mulberry Primary School
The Selby Trust
The Trampery
The Willow Primary
Tottenham SDA Church
Transport for London
Trinity Primary Academy
UBELE
UK Parliament
Wal Walthamforest.Gov
West Green Primary School
Wheely Tots
Wise Thoughts
Woodland Park Nursery School & Child's Centre



engage.
communicate.
facilitate.

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Draft Walking and Cycling Action Plan Consultation Report

Community responses summary

Section of the WCAP	Consultation responses summary	Council response	Changes made
Walking and Cycling Policies	Policies should recognise the high levels of pollution and low air quality, the high volumes of car traffic and cars parked on streets and poor maintenance and quality of street space and cycle infrastructure	The WCAP recognises these issues and the priorities of the WCAP will help ensure these issues are addressed	No change required
	No mention of public transport. Efficient and reliable public transport encourages people out of their cars and thereby increases walking/active travel	Although not part of the WCAP, the Council recognises that public transport plays a vital role in supporting our cycling and walking ambitions.	References to public transport have been added
	More secure cycle parking (replacing car spaces) outside leisure and retail facilities. Incentives for families to ditch the car-based school run where possible.	Increasing cycle parking is an integral part of the WCAP.	No change required. Already an important part of the Plan
	Policy as it stands at the moment is extremely alienating for disabled and chronically ill people	The WCAP seeks to reduce impacts caused to those with disabilities and suffering chronically illness. The plan recognises that some residents need to drive and/or receive care from those driving. The plan is aimed at those who are able to shift from the car to walking and cycling rather than forcing anyone out of their cars. It should also be recognised that some disabled people rely on their bikes, or on foot, for travel. Everyone will benefit from better air quality and safer streets. This is also set out in the Equalities impact Assessment	No change required.
	Suggestion to include wider pavement and improving the safety of pavements	The Council notes this suggestion and although this is not specifically set out in the policy, the plan (and delivery plan) does support this.	No change required.
	Suggestion to include lack of safety for cyclist, concerns for increased traffic congestion, dangerous driving and speeding that takes place i	This is set out in the WCAP section on 'the case'.	No change required.
	Green Lanes, Muswell Hill and Finsbury Park were identified as potential sites for improvements to cycling infrastructure and cycle parking	The Plan contains improvements for all these parts of the borough	No change required.

	LTN's would cause more pollution and congestion	The case for LTNs is set out in the WCAP and in the Council's decision on the implementation of the first 3 LTNs. In most cases LTNs do not shift traffic from one area to another, but overtime result in traffic reduction which will reduce air pollution and congestion. LTNs, together with the other projects in the WCAP, will deliver mode shift away from the private motorcar.	No change
	Experiments of LTNs have failed and created misery for residents and businesses. Pollution everywhere. Keep things as they are	See above	No change
	Reallocation of road space should include kerb space and it should be made clear that reducing parking and therefore disincentivising driving, especially for short trips, is a key objective	In general, the Council supports this. A balance will need to be found in delivering the WCAP and rebalancing parking where loading pressures are acute. Rather than disincentivising driving, the WCAP seeks to enable those who can to choose to walk or cycle over the use of the motorcar	No change required.
	Reallocation of road space should include the suspension of parking on all designated bike routes.	The Council supports this as a means to improve cycling safety. Each location will need to be assessed to ensure we balance the needs for loading with the cycling scheme	No change required.
	Criticism about the negative effect the plans may have on disability access and disabled people.	The impact of the plans on disabled people is set out in the EqIA. The WCAP seeks to reduce impacts on people with disabilities.	References added about enhancing equalities as far as possible and minimising impacts
The case for walking and cycling	Greater priority should be given to air quality, and a reduction of idling cars. Some respondents suggested introducing fines for idling traffic.	The Council supports this and has an anti idling campaign to reduce idling primarily outside schools.	References added to the anti idling campaign
	The WCAP needs to recognise the timing and context, for instance, plans should have considered electric charging point and the shift to low pollution vehicles.	Electric vehicles are not part of the WCAP but the council supports EVs as an alternative to the motorcar. The Council has an Ultra Low Emission Vehicle Action Plan which sets out the policies and approaches to introducing more charging points and support the uptake of EVs https://www.haringey.gov.uk/parking-roads-and-travel/travel/electric-vehicles/ultra-low-emission-vehicle-action-plan-2019-2029-consultation	No change required.
Walking in Haringey today	Let's encourage safe and inclusive walking on pavements and in parks - rather than on roads.	The Council supports this and the WCAP seeks to deliver this	No change required.
	Retain any widened pavements implemented to facilitate social distancing. Consider also using extra width for young children to safely cycle on, introducing them early to active travel	Pavement improvements are part of the WCAP delivery plan.	No change required.

	Would like to see some routes to the east of the Tottenham High Road, Carbuncle Passage from High Road to Tottenham Marshes Bridge, Shelbourne Road as a north to south route that is residential. more needs to be done to support safe access to green spaces via Tottenham Marshes Bridge and clean routes from Northumberland Park station to the marshes and also Waterhead Way underpass	The Council supports this and the Council's Regeneration team have a programme for delivering these improvements, subject to funding. This opportunity will be added to the WCAP	Reference added to improving access to east of Tottenham
Cycling in Haringey today	The need for more safe cycling routes	This is a fundamental part of the WCAP ambitions	No change required
	Plans should be developed and introduced quickly across the Borough	The Council's WCAP is a 10 year plan but should opportunities arise for funding to deliver more and quicker, the Council will bring forward schemes from later in the Plan period.	No change required
	Greater consideration needs to be paid to the dangerous roads and junctions, and the impact this has on cyclist safety	Agreed and this is set out in the barriers section of the WCAP	No change required
	Should recognise unaware or aggressive driver behaviour as a key issue to cyclist safety i	Agreed and this is set out in the barriers section of the WCAP.	Added further reference about driver behaviour as a barrier
	Unsuitable cycle lanes for cyclists which include poor roads and uneven pavement surfaces.	Improved cycle lanes are integral to the plan and making cycling accessible and safe	No change required
	Cycling in Haringey is considered dangerous and the network is not connected properly to the wider London cycle network	The WCAP aims to make cycling both safer and better connected to the London wide cycling network	No change required
	Respondents wanted to see more cycle infrastructure and segregated routes, especially in the East-West traverse.	The WCAP will deliver more and better infrastructure including more east west links	No change required.
	Respondents requested to see plans developed on the following routes: Green Lanes to St Ann's Road. Glenwood Road - Belmont Road.	Green lanes to St Ann's road is a future cycleway in the WCAP. Glenwood Road is part of the approved St Ann's LTN which by its nature will create safer and quieter roads for cyclists.	No change required
	There was significant commentary supporting efforts for improved lighting alongside the cycle network, especially around Finsbury Park to improve cycling at night.	Street lighting is an important complementary measure to increased safety and therefore references have been made in the WCAP	No change needed
	A large programme of cycle hangar installation is desperately, desperately needed	The WCAP contains the largest roll out of hangars seen in Haringey and the Council will increase this where feasible.	No change needed

	It would be great if the overarching plan could be split into smaller sections with earlier deadlines so the public can follow progress and witness accountability	The delivery plan is set out to show our ambition over the next few years and longer to 10 years. We will engage with the community as schemes are brought forward and this will allow progress to be tracked and accountability for delivery	Added reference to the monitoring section on how the community can track progress
Barriers	Suggested barriers include: Poorly lit streets which make walking or cycling difficult and unsafe	Street lighting is an important complementary measure to increased safety and therefore references have been made in the WCAP	Reference to street lighting added to barriers as well as reference to wider Council investment in this regard
	Poor cycling infrastructure and segregation between motorists and cyclists, which prevents cyclists from moving freely and with ease in the borough.	The WCAP aims to tackle these barriers	No change needed
	High levels of pollution	Enabling more people to cycle and walk safely rather than drive will help reduce this.	No change needed.
	The volume of cut-through traffic in the borough	The WCAP approach to LTNs will achieve a reduction in through-traffic in residential areas. This is outlined as an objective of LTNs in the plan	No change needed
	Requests for increased cycle infrastructure, including more bike hangers, increased surveillance to help prevent bicycle theft, segregated cycle lanes and better signage	The WCAP will help deliver this	No change needed
	Dangerous roads and junctions, as well as speeding cars and rat running act as a barrier to walking and cycling in Haringey.	The WCAP aims to address these barriers	No change needed
	This needs to be an educational and behaviour change campaign to achieve more active travel. Without this, residents are unlikely to travel actively.	The Council agrees with this and the WCAP is not just about infrastructure but changing behaviours as well	Added references to make behaviour change a priority alongside infrastructure
	Safety at night for women, concerns were raised around bad lighting or anti-social behaviour.	The Council is cognisant of these concerns and actions are outlined in the WCAP to tackle them. This is also discussed in the EqIA.	No change needed
Walking in Haringey in the future	Requests to see improvements to current walking corridors and more green space.	The WCAP aims to achieve this but the importance of enabling walking could be further highlighted	References added to strengthen the priority for improvements to walking routes and more green spaces.

	There is potential to create an attractive area with green spaces throughout the Borough	Complementary measures will include public realm improvements which might include some green infrastructure to improve places.	No change needed
	Haringey should become an area with benches and parklets to ensure that people, not cars, are able to travel actively, breathing clean air.	Places for people to relax and sit is a fundamental principle of healthy streets which a theme running through the plan.	Add references to places to sit and relax
	Encouraging safer walking routes in the borough, which connects places together and walking for leisure.	The WCAP aims to do this and is a fundamental policy of the Plan. We will add references to make this clearer	Strengthen references to encouraging safer walking routes.
Cycling in Haringey in the future	More segregated cycle lanes in the Borough and referenced safety was the prime reason that currently dissuades from either feeling more comfortable when cycling or choosing to cycle more.	More segregated cycle lanes is a fundamental objective of the WCAP. T	No changes needed
	Requests for further cycle infrastructure was another common theme to arise in respondent feedback, this included more bike hangers, cycle training and clearer road signage.	The WCAP aims to make cycling both safer and better connected to the London wide cycling network	No change needed
	Requests for all cycle lanes to be connected, creating a Borough-wide cycle route.	The WCAP aims to make cycling both safer and better connected to the London wide cycling network	No change needed
	Green Lanes was mentioned most frequently, followed by Finsbury Park, Wightman Road, and Wood Green	The WCAP aims to make cycling both safer and better connected including key routes in these locations	No change needed
	Haringey Green Lanes needs to be given massive priority (I see it is currently unfunded which is disappointing and concerning). It is the highest corridor for collisions by some mile which is not surprising having cycled along it many times myself! It's dangerous with such a massive presence of parked vehicles, heavy congestion and dangerous vehicle manoeuvring" "The Green Lanes cycle lane is a must! Without that the map is missing one of the most important strategic routes."	Haringey Green Lanes is identified for improvements from 2022/23	Updated delivery plan
	Finsbury Park: "The route connecting Wightman Road to Finsbury Park should be a priority."	This route is a priority in the WCAP and feasibility works will commence in 2022/23	No change required
	Wightman Road: "Wightman Road is not a suitable alternative to a cycling route on Green Lanes." "Wightman Road would need the junction	Further consideration will be given to this as part of future improvements in the area	No change required

	at Turnpike Road redesigned for a cycle route there to work."		
	Wood Green: "We need cycle lanes east – west between Wood Green & Tottenham, e.g. White Hart Lane." "There is an easy opportunity to create a flat and safe cycle route from the Gardens area to Wood Green, using Langham Road as a connector to the existing east-west route to the North."	The feasibility of this will be explored in 2022/23	Updated Delivery Plan
Low Traffic Neighbourhoods	Some residents are concerned about the potential for displaced traffic and increased pollution, were further LTNs introduced. Muswell Hill, Wood Green and Shepherds Hill were areas mentioned in relation to this theme.	All LTNs brought forward are subject to comprehensive monitoring including changes in traffic levels and air quality	No change needed
	Suggestion to include a road safety classification, accident rates and greater consideration given to LTN boundary roads, in the criteria	Comment noted. Consideration will be given to these factors as part of the future roll-out of LTNs in the borough.	No change needed
	The potential impact on public transport, particularly buses, and emergency vehicles was a concern raised by a number of participants	All LTNs brought forward are subject to comprehensive monitoring including potential impacts on buses and emergency services	No change needed
	Greater recognition and consideration should be given to those who are less able to walk and/or cycle, such as the disabled or elderly. There were also comments concerned about the potential financial impact of LTNs.	The WCAP is supported by an EQIA and each scheme delivered will be consulted on and have its own EQIA	No change needed
	LTNs have a disproportionately negative impact on residents in lower quality housing.	The Council does not agree based on the current available evidence	No change needed
	Requests for additional LTN neighbourhoods, including areas with high density of schools and boundary roads to LTNs - Endymion Road to Stroud Green, Muswell Hill, Crouch End and Highgate	The WCAP sets out a borough wide strategy for LTNs	No change needed
	Some residents do not believe LTNs will result in traffic evaporation and are concerned this will result in displaced traffic, causing increased congestion and pollution levels in other areas of the Borough.	All LTNs brought forward are subject to comprehensive monitoring including changes in traffic levels and air quality	No change needed

	Some residents were keen to stress that not all journeys can be undertaken on foot or bicycle and require the use of private vehicles.	The Borough's Transport Strategy acknowledges that not all trips can be made by walking and cycling and this is also acknowledged in the WCAP.	Further text added to WCAP to reflect this point
	Requests for a network of LTNs to be introduced in Haringey.	The WCAP sets out a borough wide strategy for LTNs	No change needed
Future - Active Travel and Development	Would like public transport added to the list of active travel priorities.	Public transport will be supported by our active travel programme	Text added into WCAP about role and importance of public transport in enabling active travel
	More cycle and walking infrastructure introduced, including modal filters, segregated cycle lanes and wider pavements, to support resident's active travel	This is the aspiration of the WCAP and is covered by the delivery plan	No change needed
	Greater recognition that not all residents have equal access and ability to actively travel, and greater consideration given to those individuals/groups.	The Borough's Transport Strategy acknowledge that not all trips can be made by walking and cycling and this is also acknowledged in the WCAP.	No change needed
	Further parking restrictions are necessary to ensure the smooth travel of the active travel modes.	Parking restrictions will be explored on a scheme by scheme basis	No change needed
Additional Comments	Greater reference and priority should be given to public transport in the draft WCAP, including improve infrastructure and services, as well as more bus route options to reduce reliance on private motor vehicles.	Agreed	Text added into WCAP about role and importance of public transport in enabling active travel
	The proposals do not consider those who are unable to take part in active travel, including disabled, elderly, those with more than one young child and those with health issues.	The Borough's Transport Strategy acknowledges that not all trips can be made by walking and cycling and this is also acknowledged in the WCAP.	Further text added to WCAP to reflect this point
	Suggestions included greater enforcement, increased parking charges and more no parking zones.	This is outside the scope of the WCAP and will have to be consulted on as part of any future Parking Plan	No change needed
	Requests for more cycling and walking infrastructure to support the proposals. Requests included more bike hangars, ensuring all bikes lanes are segregated and connected and introduction of an e-bike hire scheme for the hillier areas of the Borough.	Requests noted and these included within the delivery plan	No change needed

Stakeholder responses

Section of the WCAP	Consultation responses summary	Council response	Changes made
	WCAP should include opportunities and changes that reflects the differing levels of need of Haringey residents.	The WCAP reflects the different needs of residents in the borough and prioritises improving the highway for more vulnerable road users	No change required
	The suggested inclusion of a map of community toilets available across the borough in the plan.	An interactive map will be produced to support the WCAP and we will seek to include community toilets on this	To be added to the online map
	Inclusion of community events and activities to encourage more sustainable travel.	This forms part of the education, training and publicity section which is included in the delivery plan	No change required
	Welcome further explanation of how the proposals tie in with London's overall strategy for cycling and how the New Cycle Route Quality Criteria will be used to assess existing and proposed cycle routes in the borough. TfL also stated they would like greater consideration of the role of public transport, particularly the bus network, in the WCAP	The WCAP is in line with the borough's Transport Strategy which is in line with the Mayor's Transport Strategy. New cycle route quality criteria will be used in the design of future cycle routes. The role of public transport is clearly set out in the borough's Transport Strategy. The WCAP is one of the supporting documents.	Text added into WCAP about role and importance of public transport in enabling active travel
	A representative from SCALD argued that concerns of people with disabilities and their carers are being ignored in the draft WCAP and fail to consider the needs of those who rely day to day on access to motor vehicles. SCALD report that many of those they represent feel they have not been 'listened to	The Borough's Transport Strategy acknowledges that not all trips can be made by walking and cycling and this is also acknowledged in the WCAP. The WCAP does consider the needs of people with a disability and is supported by an EQIA. In addition, all future schemes will be subject to consultation and a separate EQIA.	No change required
	The Canal & River Trust express support for Haringey Council's draft WCAP and its vision. The Trust emphasise that all resources should be capitalised on to improve opportunities to walk and cycle and remove barriers, and as part of this aim Lee Navigation should be valued as a key active travel and leisure resource. The Trust note that some policy aims, including path design and lighting, is not appropriate in some locations due to the impact and restrictions on nature and biodiversity	It is acknowledged that there are designs limitations in providing infrastructure in the Lee Valley and the design measures proposed in the WCAP may not be suited to some areas of the Lee Valley	No change required

Support for the draft WCAP's intent and welcomes the application of the modal hierarchy and the overall direction of policies 1-5. Requested that a series of priorities, investment plans and measurable goals are added to the plan, as well as an assessment of quality and type of intervention	The document is supported by a delivery plan which has been updated to reflect the funds available and the borough's aspiration to deliver key infrastructure over the next 10 years.	Update delivery plan and monitoring section
Add to Active Travel Projects: ' Personal Travel Planning Project' – Annually 2 wards door knocking & various community events - aim to engage 5,000 residents to encourage 'pledges' to travel more sustainably; estimated annual cost £40,000 – unfunded	Active Travel is included in the delivery plan for the next 10 years, and will deliver some or all the measures proposed. As this is a 10 year programme the activities will change annually.	No change required
'Walking Projects' – a series of annual events and activities (e.g. Xplore an intergenerational fun orienteering activity, development of faith based walking groups etc) targeting inactive communities to encourage more walking; estimated annual cost £25K unfunded."	Active Travel is included in the delivery plan for the next 10 years, and may deliver some of the measures proposed. As this is a 10 year programme the activities will change annually.	No change required
Section 1.9 (Page 6) mentions the importance of removing street clutter. Pavements are getting smaller and more restricted. This is caused by many things including parking pushed up half off the road or extra signage installed. This creates a disaster for people with accessibility needs and needs to be rectified with a specific plan. If not in this plan then I would like to know that it is coming in a future, separate plan.	This issue is noted. Responses to it are is covered in the delivery plan as part of the annual investment in walking	No change required
Low cost traffic calming measures The document goes into detail on the need for LTNs and their importance but should make reference to low cost, simple alternatives that can be taken on, and removed if needed, easily. This can be trialled as a solution without the standard scale intervention of larger projects.	Suggestion noted. There is potential for these measures to be added as part of future LTN schemes.	Added wording of benefits of low-cost traffic calming measures as part of, or separate, from LTNs
The plan should commit to developing an e-scooter strategy to add to the plan when e-scooters become more established in London.	The borough is currently part of the London-wide working group on this issue and will explore the delivery of e-scooter when they become more established.	Updated section on micro-mobility

	The WCAP needs to start where delivery needs to start. Need to do more to identify specific walking interventions with difference between medium and high priority schemes.	The delivery plan sets out the annual budget for walking and measures will be tailored as part of the 10 year programme	No change required
LTN	This policy would be strengthened by explicitly recognising the need for LTNs to be delivered in an accessible and inclusive way to enable older and disabled people to engage in active travel. It is also worth recognising that LTNs can impact both the Transport for London Road Network and borough road network through traffic reassignment which, in turn, can affect bus journey times. LTNs should therefore be carefully designed to mitigate any impacts on other users of active, sustainable and efficient modes in the area, working in close consultation with TfL. For instance, a logical complement to LTNs is a stronger bus priority network on the main roads between LTNs. This will offer better alternatives to car use, help cycling and enable more walking. We would be keen to work with Haringey to see the development and delivery of more bus priority. While we agree with the general principle of prioritising Low Traffic Neighbourhoods where there is expected to be most positive impact, the deliverability and local appetite for change should be strongly considered when making the case for a scheme, particularly for the first wave of projects. We would recommend referring to the methodology set out in the Strategic Neighbourhood Analysis appendix: https://content.tfl.gov.uk/lsp-app-six-b-strategic-neighbourhoods-analysis-v1.pdf	All LTNs proposed will the subject to substantial engagement and consultation to ensure needs of individuals are fully considered. The Council will work closely with TfL on the roll out of LTNs including in relation to buses. This is consistent with the approach the Council has taken to the 3 LTNs already approved for implementation. The methodology is noted and the Council will consider this.	No change required
	On Canal Towpaths, path design is not necessary required to meet the standards of Dot's LTN120 and may not be able to do so due to space operational and design limitations.	Comments noted in relation to canal towpaths. All schemes will be subject to feasibility including consideration of design limitations.	No change required

	The Lee Valley and Lee Navigation should be highlighted as key destination/ resource for residents of Haringey and visitors to the borough within the WCAP	Haringey agrees the Lee Valley is a key destination and will include it as such as part of future online mapping	Add to online mapping
	The Strategic Cycle Analysis (SCA) highlights the Lee Navigation as a route for medium demand future demand and the cycle network gap analysis does not at present highlight the Lee as a high priority for future improvements in the context of the rest of the Borough.	The gap analysis and future demand analysis are based on the TfL Play book. We will request TfL to look at this issue as part of their future work.	No change required
	The relative value and potential for conflict between walking and cycling is a subject often avoided. It is noticeable throughout the document that the chief consideration is cycling rather than walking: for every page on walking there are 3 or 4 on cycling. Given that walkers outnumber cyclists 30 to 1, and that walking is apparently meant to be the highest priority this is unacceptable. Although cycling has clear and significant potential benefits to both the individual and the environment, it is observed that while a doubling of cyclists would still leave the mode as a minority activity, a doubling of pedestrians would be transformational. Indeed, the evidence base presented for cycling contains rather elevated claims, for example 3.4 is predicated on increasing cyclists by between 500% and 1,250%.	Comments noted. Walking is the main mode supported through the WCAP and this is reflected in our road space reallocation policy. The starting point for cycling is very different to walking and hence this mode requires more investment.	Strengthening of walking section to reflect the priority of this as part of the WCAP
	It is greatly disappointing that Policy 5 receives so little attention: unlike walking, cycling and LTNs, the reallocation and the redesign of major roads and junctions has no devoted chapter; and in the delivery programme no projects of town centre infrastructure interventions are identified – unlike cycle routes or LTNs.	The reallocation of road space and the redesign of major junctions are discussed in the barriers section and will be addressed as part of the delivery plan.	No change required
Barriers	The plan lays out (Page 38) several current routes which, beside some occasional painted pictures or signs, are unrecognisable on the ground as cycle lanes. For example Dukes Avenue in Muswell Hill. On many there is no segregation This gives a false indication to residents that these routes are safe and, if anything, their inclusion causes more	We agree that some of the existing network will need upgrading and will change the online map to reflect this.	To be updated on the online map

	harm than good. They should either be removed from the diagram or a thorough explanation of their situation should be included. or even demarcation of sections for car and cycle.		
	Section 1.9 contains an aim that “There will be high levels of cycling amongst residents from all backgrounds and communities in Haringey”. This is an important point, as having a greater diversity of people engaging is good in and of itself, but may further encourage people from those backgrounds, therefore increasing the overall number of cycling journeys. 8.42 talks about addressing this but makes no references to how. We need specific plans and structures to address this issue, see point 7 on this list for an example.	Comment noted. This will be addressed as part of our education, training and public campaign, which will help create a culture for cycling in the borough from primary school age to adulthood	No change required
	Community and stakeholder engagement and consultation are central to the design and delivery of delivering inclusive, high-quality improvements for walking and cycling, and the references to these throughout are welcomed. We would encourage the borough to also consider plans for working with stakeholders and communities to achieve new infrastructure and drive behaviour change, especially to achieve an increase in the number and diversity of people cycling in the borough.	We agree that the borough needs to work closely with the community and other stakeholders to create a culture for walking and cycling in the borough. This will be achieved via our education training and public programme funded in the delivery plan.	No change required
	The idea of ‘place’ is often insufficiently drawn in Transport and Highways planning, but should be paramount: places are preeminent destinations and therefore govern movement. It follows that the design of transport networks should always include a consideration of why and where people travel, and include an assessment of the impact on local communities. The functioning of the town centre is particularly important. Creating an attractive public realm which draws in visitors and encourages them to spend more time at a place is key to supporting and increasing the viability of the local economy, civic values, and wellbeing.	Comment noted. The importance of place will be carefully considered and reflected in future scheme designs	No change required

	A recent survey by Transport for All revealed that 77% of people with a range of disabilities took a negative view of LTN schemes across London. They reported longer journey times, that were 'exhausting, expensive and difficult'. Many also complained about the inadequate consultation and their perception that they had not been 'listened to'. Haringey is not listening	All LTN proposals will be subject to significant engagement and consultation. This includes with groups that have potential to be disproportionately impacted. The Council is preparing an LTN Exemptions Policy designed to ensure LTNs in the borough advance equalities as far as possible.	No change required.
	Concerns about the lack of funding, prioritisation and tangible goals detailed in the draft WCAP	The Council has committed £5.1m capital funding to support delivery of projects in the WCAP. The WCAP cannot commit to any projects beyond those which are currently funded. The WCAP will however support the Council to secure funding from other available funding sources to deliver projects in the delivery plan which are currently unfunded.	No change required
	The group also stated they would like to see an improved cycling culture, more focus on commuting and some concerns with the current process of bike hanger allocations.	Comment noted and need for more investment in bike hangars acknowledged. The adoption WCAP delivery plan commits £600k towards cycle hangers to help address the current need.	Delivery plan updated to reflect increased investment proposed
	Unfunded Plans This document contains plans for: 34 cycle tracks, of which 32 (94%) are unfunded 25 LTNs of which 22 (88%) are unfunded 8 walking schemes, of which 7 (88%) are unfunded, 49 school streets of which 29 (59%) are unfunded, 4 cycle parking schemes of which 3 (75%) are unfunded	The Council has committed £5.1m capital funding to support delivery of projects in the WCAP. The WCAP cannot commit to any projects beyond those which are currently funded. The WCAP will however support the Council to secure funding from other available funding sources to deliver projects in the delivery plan which are currently unfunded.	No change required
	These unfunded schemes are proposed to be financed from further grants, mainly from TFL. There is no mention of what the plan will be if these grants don't come to fruition. There is no priority list associated to assess what the council may consider enough of a priority to do off its own capital spending. With TFL's current financial predicament, and Haringey council's poor record on bid winning, this entire document reads as more of a wish list than a serious plan for the future.	The Council has committed £5.1m capital funding to support delivery of projects in the WCAP. The delivery plan sets out what is currently funded. The WCAP cannot commit to any projects beyond those which are currently funded. The WCAP will however support the Council to secure funding from other available funding sources to deliver projects in the delivery plan which are currently unfunded.	No change required

	Lack of tangible goals and incremental goal points. Other than the plans already in action or set for funding all others have no fixed date or schedule. There should be set numbers of plans to be achieved each year, starting small but increasing as we get used to how they go.	The delivery plan includes details of funding status and indicates delivery periods where possible	No change required
	There are several references to long term goals. Including 8.55 and most notably 11.17 which states “The vision for Wood Green is that it will become North London’s most prosperous and green town centre” This is a long term vision that we can all agree with but the current situation is unsafe, highly polluted and congested with vehicles. It would be good to see plans to at least make it liveable in the short term rather than looking at long term dreams and aspirations.	Separate from the WCAP, the Council is looking at a range of improvements to Wood Green over the short-, medium- and longer-term	No change required
	Little mention of e-bikes Despite mentioning the difficult topography there is little mention of a simple solution, E-bikes. These can allow a greater variety of people to cycle, not only improving the overall number of non-car journeys taken but increasing the diversity of people who cycle.	The WCAP already references electric assist bicycles but comment noted about limited visibility in document	Added text to WCAP about e-bike opportunities
	Bike hanger waiting list Last summer Haringey responded to a freedom of information request asking about the number of outstanding residents on the bike hanger waiting list, stating there were 6000 people on the list. This document several times refers to 1000 outstanding residents requiring bike hangers (8.51). What is the reason for this disparity? 9. Bike hanger allocation 8.54 states that spaces are given based on users' needs, “Spaces in a bike hangar are allocated based on a priority system that considers each individual’s personal circumstances”. This seems to not be the case currently.	Comment noted and need for more investment in bike hangars acknowledged	Delivery plan updated to reflect increased investment proposed

	Commit to a minimum standard of cycle lanes We echo the Haringey Cycling Campaigns calls for high-quality infrastructure. This includes light segregation, proper understanding of the situations around junctions and following best practice and guidance on design generally.	The WCAP seeks to deliver high quality infrastructure in line with the best practice guidance.	No change required
	Borough boundaries The plan does not address the challenges of borough boundaries which may explain why so little is proposed on the edges of the borough. This action plan will only be successful if there are routes where residents want to go and some of these routes need to accommodate travel in and out of the borough. Close collaboration with neighbouring authorities will be required	The Council is committed to working with neighbouring boroughs, in particular on cycle route feasibility and design to ensure that cycle routes are connected.	No change required
	Quietway 10 is further advanced in delivery, but I have no idea why this route is directed up one of the steepest hills in North London (Uplands Road). Alternatives? Indeed, the gradients of the Northern heights appear not to be prime consideration generally – surely some routes could be designed to take this into account?	This section of the borough poses a general issue due to the number of hills. We will work with stakeholders as part of the detailed design to find the best route possible	No change required
	The need for secure cycle parking and cycle hubs is supported. Two locations have been suggested to the Forum. Firstly, outside Hornsey station (see comments below), secondly near Hornsey Library. It may be desirable to relocate existing cycle stands that cause an obstruction to footways.	Comment noted and need for more investment in secure cycle parking acknowledged.	Delivery plan updated to reflect increased investment proposed
	11.57 Public transport – this only mentions improving connections with cycling. Why? Surely the chief point of public transport is to carry people who then walk.	Comment noted	Text added into WCAP about role and importance of public transport in enabling both walking
	All these proposals relate to roads that are not wide enough to facilitate bike lanes (Southwood Lane is clearly ludicrous) and will cause massive	All cycle lane design will be subject to the feasibility and design in line with the road space reallocation policy	No change required

	congestion, inconvenience and pollution for the sake of cyclists representing just 3% of road users. Buses will be delayed, because they aren't allowed to use virtually empty cycle lanes as has been the case in the High Road north of East Finchley. In addition, shops will be suffering because of difficulties in parking for deliveries		
Future - Active Travel and Development	Encouraging people to increase their physical activation is a key focus of Haringey's Early Help and Prevention Programme and Haringey's Physical Activity and Sports Strategy.	Comment noted. The WCAP is complementary to this particular work planned with stakeholder as part of the education training and publicity programme	No change required
	This plan will only be successful if it leads to measurable change e.g. increase in percentage of children walking to school, improvement of air quality etc. particularly in terms of cycling. We note that currently only 3% of trips in the borough are made on bicycles. Given that 45% of the budget is proposed to improve provision for cycling there should be more detail on what future demand might be and a target set for an increase in cycling. Measurable impacts are critical to prioritise projects that will have the most impact.	Agreed that the plan will only be successful if it leads to measurable change. Section 12 of the WCAP commits to monitoring over the lifecycle of the plan	No change required
	If this plan is to be successful in its aim to get people to turn away from cars and get on bikes then it needs to focus on commuting. There are several sections on leisure cycling but nothing (data on commute journey)	The delivery plan seeks to deliver key east-west and north-south cycle infrastructure which will aid commuting cyclists	No change required
	As a borough we should be encouraging residents to use green spaces as much as possible, they are vitally important for health and wellbeing. Therefore pathways to green spaces should be covered in the plan even if these are for green spaces just over the borough boundary.	The WCAP will assist in the delivery of connections to green spaces and this is reflected in the delivery plan for both walking and cycling. Of note, the Council is preparing a separate Parks & Open Spaces Strategy.	References added to strengthen the priority for improvements to green spaces.
	As Haringey has some of the busiest Zone 3 stations on the Tube network, including Seven Sisters and Wood Green stations, as well as recent upgrades to several Tube and Overground stations, the strategy should emphasise the role of good walking and cycling connectivity to these stations. Active travel for local trips, alongside the	The WCAP delivery plan includes funding streams to increase connectivity for walking and cycling to stations	No change required

	linkages it provides to wider sustainable transport options would be expected as part of this strategy.		
	We welcome the application of the London Cycling Design Standards, but we would also suggest referencing the use of the New Cycle Route Quality Criteria here, to align borough design standards with the wider expectation for quality across the Cycleways network, and to ensure that new cycle infrastructure will address the road danger challenges identified in section 6 of the strategy.	The Council will continue to use latest TfL and DfT guidance documents to inform development of walking and cycling routes	No change required

Delivery plan and interactive map responses

Section of the WCAP	Consultation responses summary	Council response	Changes made
	Requests for more explanation of where the funding for the measures in the Delivery Plan is going to come from. Some felt the plan was hypothetical and unfunded, so therefore difficult to comment on	The funding will come primarily from the Council's Capital Programme and the Local Implementation Plan (LIP). The adopted WCAP will also be used to help bid for external funding.	No change required
	Support for an acceleration in the introduction of Low Traffic Neighbourhoods (LTN), with some advocating the introduction of a Borough-wide LTN scheme. Areas identified as ideal for an intervention included Shelbourne Road and Alexandra Park Road.	Comments noted	No change required
	Popular suggestion from respondents was to reduce roads to cars, with this suggestion being most prevalent in the N6 and N17 postcodes. Those that called for this suggestion were generally most supportive of the vision, wanting more Low Traffic Neighbourhoods to be implemented in the area.	The WCAP sets out a borough wide strategy for LTNs with individual LTNs being prioritised in line with the criteria in the WCAP	No change required

	Concerns about safety due to speeding along narrow roads, congestion and pollution in the Borough.	The WCAP will help to reduce speeding in residential roads as well as congestion and pollution through the delivery of LTNs and complementary traffic calming where required	No change required
	Active travel hindered by a long-term disability or mobility restrictions preventing residents from walking or cycling and relying on motor vehicles for transport	It is acknowledged that not all residents will be able to walk and cycle and some rely on motor vehicles for transport. The Council seeks to ensure these individuals can continue to travel as required. An LTN exemptions policy is being developed for this purpose.	Reference added to LTN Exemptions Policy being developed
	Safety concerns for women and children walking in the dark, especially during the Winter.	The Council is improving street lighting as part of its highways capital investment plans which will complement the measures in the WCAP	References to wider Council investment included in the WCAP
	Cyclists not following the Highway Code and endangering themselves and pedestrians.	All road users should follow the Highway Code and are liable to be subject to enforcement penalties if they do not comply	No change required
	Greater consideration and attention needs to be given in the Delivery Plan to disabled residents and those with mobility issues, who rely on carer support or using motor vehicles. Some residents felt that disabled and elderly residents were marginalised by the Delivery Plan outlined in the draft WCAP	The Council is committed to engaging extensively with disabled residents to ensure that equalities are advanced as far as possible. The needs of all groups have been considered as part of the EQIA and each scheme that comes forward will be subject to appropriate consultation and EQIA as required. The Council is currently developing an LTN exemptions Policy which will apply to all LTNs delivered in the borough.	Reference added to LTN Exemptions Policy being developed
	Out of the seven key occurring themes identified, ‘safer and cleaner streets’ was the most prevalent issue across all of the responses and was the most mentioned theme in the N10, N11, N17, N6 and N8 postcodes. This tended to relate to respondents wanting to see road surfaces and pavements being improved, traffic enforcements to prevent dangerous driving and speeding, and littering being addressed.	The WCAP will support safer, people friendly streets and is also complemented by wider Council investment is lighting and highways.	No change required

	Five existing issues and future concerns were: dangerous roads, pollution (noise and air), traffic and congestion, car parking and the unsuitability of the plans. Dangerous roads were overwhelmingly reported as a key issue amongst all postcodes and a cause for future concern pending the implementation of the plans	The WCAP will help support safer, people friendly streets	No change required
	Dangerous roads were identified 104 times in the N15 postcodes, with respondents identifying West Green Road, Broad Lane, Downhills Park and Tottenham High Road as key areas of concern. Some examples referencing this issue can be found below	The policies and proposals in the WCAP will help support safer, people friendly streets	No change required
	The second most frequently mentioned issue was traffic and congestion. This has been identified as particularly prevalent in N15 and N6 postcodes. There was mention that existing traffic issues would be exacerbated with the implementation of the WCAP, particularly for residents living outside of the Low Traffic Neighbourhood boundary. There was also concern that added pressure will be placed on existing rat runs	The WCAP proposes a whole-borough strategy for LTNs. LTN proposals will be subject to extensive engagement and consultation and will be supported evidence rewarding potential impacts on the local and wider highways network	No change required
	The main reason that cycling on Wightman Road is so risky is the sheer volume of motor vehicles more than 80% of which are through traffic. There is no possibility of Wightman Road becoming a safe and desirable route for cyclists unless the through traffic is eliminated.	Comments noted. The WCAP seeks to ensure that cycling routes are as safe as possible. An LTN is proposed for Wightman Road/Harringay Ladder which has the potential to reduce traffic travelling through the area.	No change required
	A continuous, protected cycle lane is needed here as cyclists are constantly squeezed by motor traffic. (N4) Vans are often parked over the cycle lane here and nothing is ever done about it. So dangerous for cyclists having to then navigate in speeding traffic	Comments noted. The WCAP seeks to ensure that cycling routes are as safe as possible.	No change required

	Other suggestions included the implementation of additional lighting to make active travel safer at night. There was also particular mention in N17 for planting trees and improving the façade of the public realm to make it more appealing for people to engage in active trave	The WCAP is complemented by the Council's other capital programmes which include investment in lighting, pavements and street greening	No change required
	Walking on Wood Lane is almost impossible because of the high volume (and high speed) of rat runners and the narrow pavements. Cars frequently park on the pavement while waiting for people coming up from the tube station. It's a nightmare for the mobility.	Comment noted. The WCAP includes future interventions in this area of the borough to enable safer movement for pedestrians.	No change required
	Requests for increased cycle infrastructure, including more bike hangars on High Streets and near residential areas and increased surveillance to help prevent bicycle theft.	The Council agrees that more secure cycle storage is required and more resources have bene allocated in the delivery plan to bike hangars.	Delivery plan updated to reflect increased investment proposed
	Some wanted the Council to ensure all cycle lanes in the borough are segregated and continuous, to help ensure cyclists feel safe in light of difficult interaction with vehicles. Main roads, such as Green Lanes, have been identified as particularly unsafe for cyclists with some calling for a cycle lane to be installed there specifically	The Council is committed to delivering the best quality infrastructure possible, subject to feasibility and design constraints	No change required
	"Provide cycle lanes from the crossings to link up with the Midnight Alley cycle lane through Downhills Park." (N15)	Comment noted. This link will be explored as part of the delivery Plan	To be added to the delivery plan and online map
	Create a segregated cycle route on Shepherds Hill to encourage active travel amongst Highgate Wood pupils." (N8)	The WCAP includes a proposal for a protected cycle lane on Shepherds Hill	No change required
	"Endymion Road between Hornsey Gate and Green Lanes: very busy and very narrow road. Needs a physically separated cycle lane." (N4)	The WCAP includes a proposal for a protected cycle lane on Endymion Road	No change required
	A dedicated, separated cycle lane is desperately needed on Green Lanes. (N8)	The WCAP commits the Council to delivering improvements to Green Lanes to enable more active travel	No change required

	A significant number of individuals used the question on the Delivery Plan to ask the council not to close Shepherds Hill to traffic, as it is perceived this measure will cause increased congestion and pollution down Wood Vale and Wood Lane. There were some suggestions that Wood Lane and Wood Vale should be included in an LTN area	The WCAP sets out a strategic framework for the future roll out of LTNs in the borough. The map in the WCAP is not a precise blueprint for what will be delivered. The Council does not have any current plans for the closure of Shepherds Hill. Any future LTN proposal will be subject to extensive engagement and consultation.	Updated text on LTN map to make clear that the cells are indicative and subject to feasibility and consultation
	Traffic/Parking/Quality of life on Shelbourne Rd is not acceptable anymore. There are lorries going down this narrow road, rat runs, overgrown hedges, multiple white vans per household all just makes it a miserable environment. Shelbourne Road has to be a top priority for an LTN. This is unacceptable and cannot continue. (N17)	Comments noted	No change required
	Wood Lane is already a traffic bottleneck - particularly at the lights heading towards Muswell Hill Road. Any measure that directs more traffic towards Wood Lane (in either direction) is no a well-though through idea. Wood Vale, Queenwood Road and Wood Lane should be a one-way road for traffic (from Cranley Gardens towards Muswell Hill Road)." (N6) Why is Wood Lane being considered as a corridor between two LTNs when it's already weight restricted and a cycle route? This proposal makes no sense and is dangerous. (N6)	The WCAP sets out a strategic framework for the future roll out of LTNs in the borough. The map in the WCAP is not a precise blueprint for what will be delivered. Any future LTN proposal will be subject to extensive engagement and consultation.	No change required
	Close Wood Lane to through traffic as part of a LTN, it is completely unsuited to the traffic it has, let alone the rat run it will be if Shepherds Hill gets closed (N6)	The WCAP sets out a strategic framework for the future roll out of LTNs in the borough. The map in the WCAP is not a precise blueprint for what will be delivered. Any future LTN proposal will be subject to extensive engagement and consultation.	No change required
	Cromwell avenue has become a popular cut through with a lot of traffic in rush hour - completely unwelcome for residents and those leaving local schools. It is a narrow road and should be blocked in some way, only accessible to residents. (N6)	Comment noted	No change required

	The WCAP document appears to show Wood Lane at the boundary between two proposed LTNs, implying that through traffic would not be allowed down, e.g. Shepherd's Hill, but would redirect down Wood Lane and Wood Vale. Wood Ln is already very narrow and cannot cope with yet more motorised traffic. It would make walking and cycling very unpleasant and dangerous. (N6)	The WCAP sets out a strategic framework for the future roll out of LTNs in the borough. The map in the WCAP is not a precise blueprint for what will be delivered. The Council does not have any current plans for the closure of Shepherds Hill. Any future LTN proposal will be subject to extensive engagement and consultation.	No change required
	Ban all parking on Green Lanes except deliveries and make the Ladder a low-traffic neighbourhood. (N4)	The WCAP commits the Council to delivering improvements to Green Lanes to enable more active travel. Parking will have to be carefully considered alongside a number of other factors.	No change required
	Some stated further explanation should be included in the Delivery Plan as to why active travel and reduced use of personal vehicles is advantageous for all the community. Without this education, it is the view of some, that the Council may fail to incentivise residents to travel more actively	The WCAP includes an education training and public programme	No change required
	The pavements are difficult to navigate - a myriad of different surfaces, kerbs, bumps, if you have mobility issues or are pushing a buggy it's tricky. (N22)	The WCAP will deliver improvements to help enable active ravel and is complemented by other Council investment in the public realm such as towards improved pavements and surfacing.	No change required

Haringey Streets for People

Walking and Cycling Action Plan

March 2022



2022-2032

Haringey LONDON

Foreword



The launch of our Walking and Cycling Action Plan (WCAP) comes at an important moment. Its development has coincided with a dramatic shift in the way lots of us use and look at our local street networks. Whilst this document was intended to support our bold and ambitious Transport Strategy and the wider aims of the Borough Plan in providing better infrastructure to support more walking and cycling, the onset of the Covid-19 pandemic has given a greater urgency to our action plan and the need not only to increase cycling and walking in Haringey but to ensure we respond to Covid 19 and the legacy it might create.

We adopted our Transport Strategy in 2018 with the ambition to become a walking and cycling friendly borough and enabling more journeys in the borough to be made by walking and cycling. This WCAP will ensure we deliver the Transport Strategy by setting policies and targets, listing actions, and outlining a framework to monitor the success of the Action Plan. The Mayor of London in his 2018 Transport Strategy (MTS) set ambitious targets for the London boroughs, including 80% of all journeys in the Capital to be made by walking, cycling and public transport by 2041.

Since the outbreak of Covid-19, the council's Transport Strategy and this emerging WCAP have become important tools for responding to the virus, helping to deliver new popup cycleways, pavement widening in town centres, school streets and developing plans for Low Traffic Neighbourhoods (LTNs) to support active travel.

Our High Streets have been particularly affected by the Covid 19 outbreak and in some cases are struggling to survive. We intend to do everything we can to support them. The evidence is clear that adapting our streets to enable more people to walk and cycle makes them cleaner, healthier and more welcoming which encourages more people to shop locally. This WCAP will help our High Streets by increasing the uptake of walking and cycling to these areas and reducing car use. The economic case for more cycling and walking to our High Streets is provided in section 3 of this WCAP.

The Haringey specific targets are set out in the document. We adopted these targets as part of the 2019-2022 Local Implementation Plan and this WCAP will help Haringey achieve these. Achieving these ambitious targets will mean that the council will need to make choices between space for pedestrians, new cycle infrastructure and the

reallocating of road space, including rebalancing parking provision, particularly in our town centres and high streets where space is at a premium.

We have worked with Transport for London, our neighbouring boroughs and other stakeholders to plan a network of safe cycle routes that link parts of the borough to town centres, schools, our parks and green spaces and importantly into the wider London Cycleway network. Near schools we are introducing school streets. The WCAP will continue to support the council's recovery, renewal efforts and harness the opportunities presented from the legacy of Covid 19.

This WCAP is built on a solid foundation and knowledge of our existing network, analysis of it conducted prior to the lockdowns, and the subsequent temporary measures introduced to address the urgent need to provide more space for walking and cycling and protect residential areas from the potential increase in traffic.

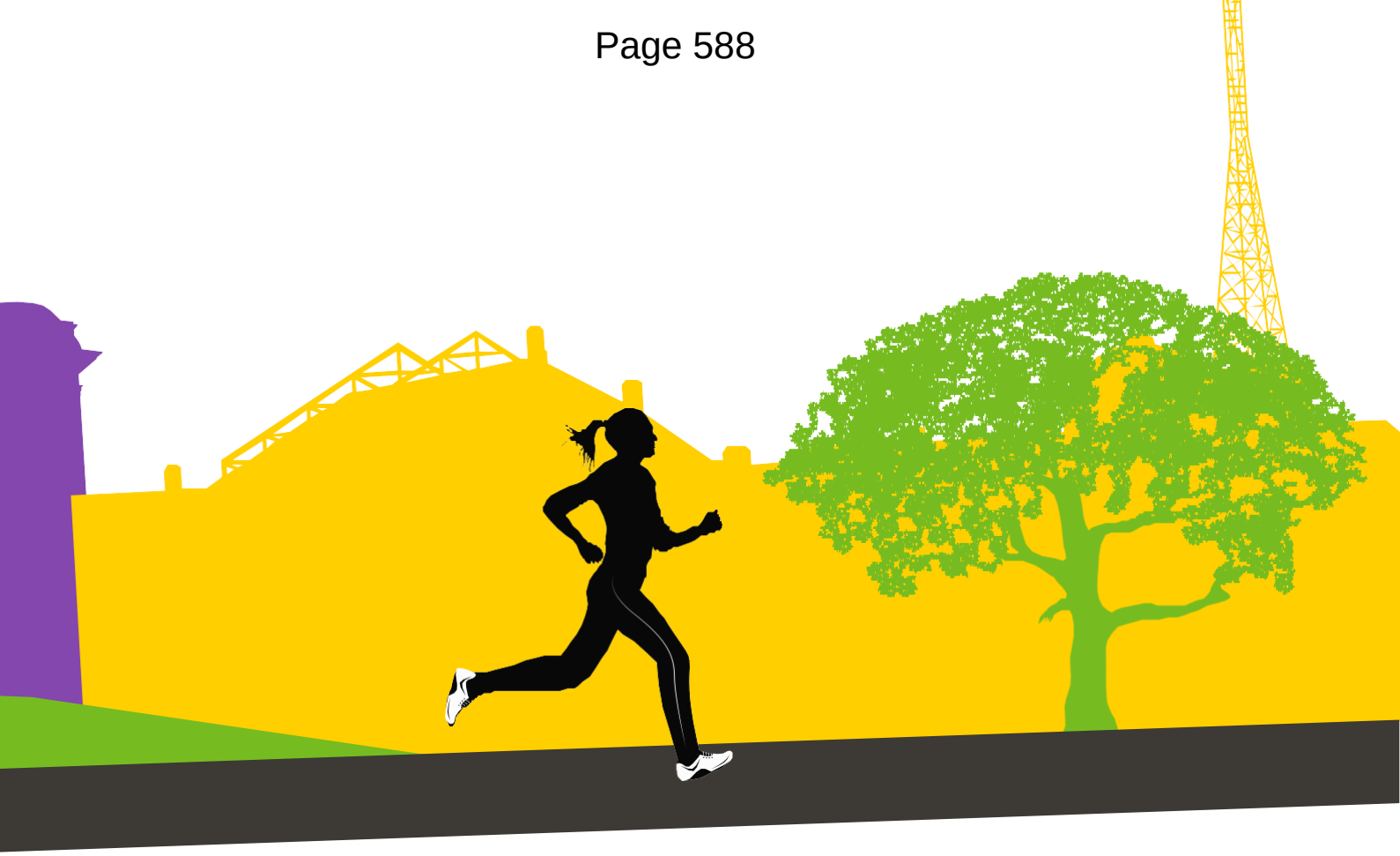
Our aim in the short term is to work with those who have funded our temporary solutions to make those that work permanently for our residents. The WCAP schemes form the basis of an emerging high-quality network in Haringey making walking and cycling natural choices. This improved network will be built upon through the duration of the lifecycle of this action plan to implement the key improvements needed. A hierarchy of modes to help deliver Haringey's sustainable transport future is introduced in this WCAP. This hierarchy will help the council plan its investment and funding. To make streets safer for walking and cycling in Haringey, the following modal priority is included:

a) Pavement users
b) Cycling
c) Public Transport
d) Electric Vehicles
e) Motor Vehicles

The extent of the ambition and the depth of analysis and the hard work of the team are revealed in this important document. The WCAP is a fundamental component in our medium/long-term strategy to successfully tackle climate change whilst also building in resilience against its effects. However, even as climate change itself is the greatest environmental challenge facing us, this is also our commitment to creating a clean air borough, a safe borough for vulnerable road users of all ages, a borough in which the vast health inequalities are not dealt with in service area silos but as one joined-up endeavour. A greener borough is a more equal borough. A greener borough is also a prosperous borough. The WCAP outlines the importance of the connections between local destinations such as high streets, shops, restaurants, cafes, venues, libraries, leisure centres, parks, to name just a few. The WCAP is part of the wider strategy to make our high streets and markets, already rich with diverse culinary and cultural offerings, inviting destinations and a magnet for people way beyond our borough boundaries. A greener borough is a thriving borough, in all senses of the word.

Councillor Mike Hakata

Cabinet Member for Environment, Transport and the Climate Emergency and Deputy Leader of the Council



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1. Introduction

1.1 This is our Walking and Cycling Action Plan (WCAP) for 2022-2032, the publication of which coincides with the launch of our ambitious 'Streets for People' initiative in which pedestrians, active travel and public transport are prioritised, especially on neighbourhood roads. It has been written with input from a team of council officers, councillors, residents and community groups with support from cycling, walking and active travel design consultants.

1.2 This Action Plan sets out how the Council will enable more walking and cycling in the borough, in line with the Council's adopted 2018 Transport Strategy and to fulfil our ambitions to have a reputation for being a walking and cycling borough both regionally and nationally. It has been prepared to help enable more walking and cycling for all individuals and groups in the community with a far to enhancing equalities as far as possible and minimising any impacts on those people and groups with protected characteristics. The WCAP is supported by a comprehensive Equalities Impact Assessment (EqIA) which concludes that the WCAP should advance equality of opportunity including by addressing the barriers faced by groups with protected characteristics. Residents will benefit from safer and healthier streets, improved health from being enabled to take up active travel options and from improved air quality. Notwithstanding this, it is recognised that not all trips can be made by walking or cycling and some people may be more dependent on a motor car. This has been considered through the WCAP, including a commitment to develop an LTN Exemptions Policy.

1.3 This Action Plan contributes towards social justice and supports businesses in Haringey. Enabling more cycling and walking is a social justice issue as hostile, motor-centric streets disproportionately threaten those with the lowest levels of car access.

1.4 For example, children in poor areas who lack gardens play in streets where cultural, legal and infrastructural norms leave them vulnerable. Those who contribute least to the problem suffer most from its impacts. More walking and cycling to our town centres will create better places with less traffic, more people, and cleaner air, and allowing businesses to flourish. Making our highstreets and public places cycle and walking friendly will make them more vibrant, better places to live, to work, to invest in and to raise children in.

1.5 The Action Plan contains a particular focus on improving connectivity in the borough's regeneration areas including Tottenham.

1.6 Vision

1.7 A key part of this Action Plan is the Delivery Plan which identifies the projects and programmes Haringey will deliver through the life of the Plan. The WCAP Delivery Plan, attached to this Plan as Appendix C, provides a costed road map to meeting the aims of the Action Plan and outlines: the future cycling routes, Low Traffic Neighbourhoods, walking schemes, the School Streets programme, the council's behavioural change programme and delivering cycle parking.

1.8 The vision for this Walking and Cycling Action Plan (WCAP) is simple: by 2032 we want:

- a reputation for being one of the best walking and cycling boroughs, both regionally and nationally
- walking and cycling are natural choices
- active travel to have improved the wellbeing of our residents, reducing obesity and improving air quality
- to reduce motor vehicles use for short trips with a shift to active travel

1.9 This action plan outlines how we will get there. Our aims and objectives are as follows:

1.10 People Walking

- Haringey will have high quality local walking routes
- The borough will be easy to get around on foot, including improved signage and wayfinding
- Walking will be the natural choice for short trips in the borough
- People walking will be the focus of our town centres and shopping areas
- Footways will be of a high standard with even surfaces and free of street clutter
- Streets in the borough's shopping centres will be nice places to walk and spend time
- Main roads will be easy to walk along and safe to cross
- Street lighting will be of high quality throughout the borough
- There will be places to rest, shade, biodiversity and things to look at
- Our streets, town centres and places of interest will be accessible by all
- Our public transport system will be accessible, affordable and reliable to support people walking in Haringey.

1.11 People Cycling

- Our cycle routes and facilities will be among the best in London
- We will have an extensive network of attractive and safe cycling routes covering all parts of the borough
- There will be high levels of cycling amongst residents from all backgrounds and communities in Haringey
- Cycling will be considered a safe form of transport for everyday journeys for people of all ages and abilities
- Every household in the borough will be able to access secure cycle parking facilities
- High quality cycle parking will be easy to find near to shops and town centres and other important locations
- Cycle training will be available for everyone who lives in Haringey who wants to learn
- Our streets, town centres and places of interest will be accessible by all
- Wayfinding and signage will make it easy to cycle in Haringey

1.12 Healthy Streets

1.13 The Healthy Streets approach is the underlying framework for the Mayor of London's Transport Strategy (MTS). This approach is a system of policies and strategies to put people, and their health, at the heart of decision making. Haringey has adopted the Healthy Streets approach to deliver this Action Plan and the improvements necessary to enable the borough to improve people's experience of walking, cycling and using public transport and also encourage fewer trips by car.

1.14 Healthy Streets can provide high-quality environments with enough space for walking, cycling and public transport use. Streets can be enhanced with seating, shade, trees and greenery, and reduced dominance of vehicles by designing for slower vehicle speeds. They can hold events and activities that entice people out to shop, play and socialise. Adopting the healthy streets approach will help Haringey work towards creating a healthier and more attractive street environment, increasing the number of people walking, cycling and using public transport and changing streets so that quality of life for all people is improved, enabling people to live well and also to reduce inequalities.

1.15 The Healthy Streets approach is not a quick fix to deliver change, it is a long-term plan for improving people's experiences of streets, helping everyone to be more active and enjoy the health benefits of an improved environment.

1.16 Figure 1 shows the ten indicators that are used to measure Healthy Streets. Using these evidence-based indicators will help to ensure that streets are made to be more attractive places.



1.17 Healthy High Streets

1.18 In 2018 Public Health England adapted the Healthy Streets approach[1] for the context of High Streets. According to their report, good quality design and furniture in local high streets that provide accessible, safe, communal spaces foster social interaction and strong local economies and can be used to create healthier, safer and more cohesive local communities. This distinction between Healthy Streets and Healthy High Streets is supported by the WCAP which recognises the position High Streets play within communities and the important role they have in influencing the health of local communities and local economy.

1.19 According to Public Health England, High Streets should:

- be inclusive of people from all walks of life
- be easy to navigate, including crossings
- provide shade, shelter and places to stop and rest
- be walkable and provide options for cycling
- have low levels of noise and air pollution
- provide things to see and do
- have a health-promoting retail offer
- ensure people feel relaxed and safe
- consider the local context of the high street, its features and current use, and how all these factors interact with one another

1.20 Haringey 'Streets for People'

1.21 The WCAP will be delivered under the branding of 'Streets for People'. The aim of the branding is to express the council's ambitious programme of walking and cycling projects and our collective aim to be a green walking and cycling borough.

1.22 The council wants to reclaim our streets for local people by creating safe, active and pollution free neighbourhoods

Haringey Streets for People

Haringey's targets for Walking and Cycling

1.23 The MTS sets the following targets for Haringey:

- Mode share - 88 per cent of all trips in London to be made on foot, by cycle or using public transport by 2041 (77% in 2019)
- By 2041 81% of Haringey residents will live within 400m of the strategic cycle network (currently 17%)
- Physical activity - all Londoners to do at least the 20 minutes of active travel they need to stay healthy each day by 2041 (currently 32%)

1.24 As part of the Haringey Local Implementation Plan 3 (2019/20 - 2021/22), Haringey adopted these targets. In addition, Haringey adopted a Vision Zero approach towards eliminating all road traffic deaths and serious injuries by 2041.

1.25 Of the 77% of trips by foot, cycle or public transport in 2019 mentioned above, cycling accounts for 3% of all trips, walking accounts for 36% and public transport for 38% of all trips in the borough. Car (and motorcycle) trips accounts for 23% of all trips.

1.26 Currently 17% of Haringey residents live within 400m of the strategic cycle network and 32% of the borough's population travel actively for at least 2 x 10 mins a day. Both these statistics show the scale of ambition needed in this WCAP to deliver the above targets.

2. Action Plan Policies to support walking and cycling



2.1 Policy 1 – Increasing Active Travel

A. Haringey will be a borough where walking and cycling will be the default choice of travel, by improving street environments, supporting accessible and inclusive streets and making it easier for everyone to get around on foot and bicycle, and promoting the benefits of active travel.

B. Haringey will reduce dependency on cars in the borough in favour of active, efficient, and sustainable modes of travel through the provision of high-quality walking, cycling and public transport infrastructure.

C. Haringey will use the Healthy Streets approach to put health at the heart of decision making and deliver coordinated transport and street improvements including Low Traffic Neighbourhoods, Liveable Neighbourhoods, new cycleways, and footway improvements to enable more active travel. Haringey will develop proposals to promote accessible, safer, and well-planned active travel opportunities to establish itself as one of the most cycling and pedestrian friendly boroughs in London.

D. Haringey will seek funding to deliver a range of behavioural change programmes to enable people to walk and cycle more in the borough and promote social inclusion.

E. Haringey will support active travel by reducing road user casualties, especially among younger and older pedestrians, cyclists and other vulnerable road users and to address the needs of mobility impaired users of all transport modes.

F. Haringey will ensure all active travel improvements improve the health and wellbeing of everyone and tackle the issues of social injustice and social inclusion by making sure everyone has access to safe and sustainable transport choices.

G. All interventions should seek to improve the road safety for all users, identifying opportunities for cycling schemes to benefit pedestrians.

H. Haringey will address barriers to active travel through working in partnership with TfL, neighbouring boroughs, emergency services, transport operators, infrastructure providers, business, community, and other stakeholders, and the public to deliver this action plan

2.2 Policy 2 – Walking

A. Haringey will unlock the walking potential in the borough by removing barriers enabling more people to travel part or all of their journey on foot, improve the experience of walking in Haringey and reduce car dependency by encouraging mode shift from the car to walking.

B. Haringey will create opportunities for new walking trips, particularly to, from and in town centres and improve walking access to transport interchanges, schools, parks and other destinations.

C. Haringey will reduce the impact of vehicle traffic and parking, making our streets better and safer places to walk and spend time. Trips to school will be targeted through the introduction of school streets to reduce car use and promote walking.

D. Haringey's streets will be improved for walking using TfL's Planning for Walking Toolkit to ensure our streets remove any disabling barriers for disabled people



2.3 Policy 3 – Cycling

A. Haringey will deliver improvements in cycle infrastructure to support more cycling in the borough to:

- create a cycling culture
- improve the health and wellbeing of residents
- address congestion and air quality issues
- ensure nobody is excluded from the benefits of cycling
- reduce the reliance on the car
- benefit businesses and help restore vitality to local high streets and town centres

B. Haringey will address the barriers to cycling to ensure everyone who wants to cycle for their journeys will be able to.

C. Haringey will create opportunities for growing, connecting and improving our cycle network to ensure our streets work better for people by reducing the dominance of the car.

D. Haringey will deliver high quality cycling routes, more cycle parking and cycling training.

E. Haringey will design cycle friendly streets and spaces which, as a minimum, meet the London Cycling Design Standards and the new national cycling infrastructure design Standards (including DfT's LTN 1/20), including the requirement to deliver streets which are coherent, direct, safe, comfortable and attractive.



2.4 Policy 4 - Low Traffic Neighbourhoods

A. Haringey will deliver a network of Low Traffic Neighbourhoods across the borough to:

- significantly reduce traffic volumes not only on the residential streets but across the borough
- achieve traffic evaporation with short trips previously undertaken by cars being switched to other sustainable modes
- increase physical activity through more walking and cycling
- provide healthy and safer routes to schools and other destinations
- benefit local businesses
- create new public space
- deliver improved air quality

B. Haringey will develop a borough wide vision for Low Traffic Neighbourhoods, taking into account the function of the street network, the availability of through routes and the location of key destinations in the borough

C. Haringey will prioritise Low Traffic Neighbourhoods based on where the approach will have the greatest impact, rather than where it will be easiest. This criteria-based approach will include the following considerations:

- Traffic and road danger reduction
- Potential for more walking and cycling
- Reduction in traffic volumes and vehicle speeds including mitigating against the displacement of traffic onto other local roads
- Enabling social distancing and space to meet
- Cycle connectivity
- Safe access to schools and local businesses
- Demographics/deprivation
- Deliverability
- Cost
- Community group engagement
- General suitability/other characteristics

D. Haringey will work with local communities and groups to establish a network of initiatives to assist in the delivery of Low Traffic Neighbourhoods.

E. Haringey will work with the Emergency Services to ensure their access into and through Low Traffic Neighbourhoods is suitably maintained.

F. Haringey will ensure the Low Traffic Neighbourhoods benefit everyone, not just those living the Low Traffic Neighbourhood areas.

G. To ensure essential journeys by vulnerable residents are not impacted by the introduction of the low traffic neighbourhoods, an LTN Exemptions Policy will be developed together with a process for applying for an exemption.

2.5 Policy 5 – Re-allocating road space to enable sustainable growth and to make walking and cycling safer

A. To provide for future demand and to facilitate sustainable transport Haringey will re-allocate road space to make streets safer for walking and cycling according to the following modal priority:

- Pavement / footway users
- Cycling
- Public Transport
- Electric Vehicles
- Motor Vehicles

B. Haringey will ensure decisions made on re-allocating road space will take into account the competing needs of streets and their users, particularly in our town centres, recognising a street functions as both a link and a place.

C. Haringey will where appropriate reallocate existing car parking and loading for high streets, town centres, schools and other locations, to:

- Enable more cycling and walking
- Improve public transport accessibility
- Facilitate access for freight and servicing including by cargo bike
- Support the viability of the town centres
- Make existing road space more efficient
- Facilitate freight by cargo bikes

D. Haringey will seek to re-provide the reallocated car parking and loading spaces from the locations listed in (c) onto adjacent streets where there is existing parking capacity to accommodate them. This approach does not prejudice the parking concessions for people with serious walking disabilities which are set out in the council's Disabled Parking Place Policy[2]



2 https://www.haringey.gov.uk/parking-roads-and-travel/parking/dedicated-disabled-parking-bay

3. The Case for walking and cycling

3.1 The Economic Case (including supporting our Town Centres and High Streets)

3.2 Our dependence on the car imposes significant economic costs on society. These include: congestion; road casualties; physical inactivity and the ill health caused by it (e.g. obesity); pollution (and the associated damage to buildings, ecosystems, agriculture and health); as well as the geopolitical costs of maintaining fossil fuel supplies in an increasingly unstable global environment.

3.3 Cycling could substantially reduce these risks, while strengthening the local economy; supporting a local community wealth building approach, supporting local businesses and property values; boosting the economic productivity of a healthy and satisfied workforce; and enabling disadvantaged groups to gain skills and access employment opportunities. Walking and cycling will support the borough's Good Economy Recovery Plan in response to Covid-19 to connect people to new job opportunities and support our high streets.

3.4 According to Cycling UK[3]

- If cycle use increases from less than 2% of all journeys (current national levels) to 10% by 2025 and 25% by 2050, the cumulative benefits would be worth £248bn between 2015 and 2050 for England - yielding annual benefits in 2050 worth £42bn in today's money.
- In 2009, production losses due to mortality and morbidity associated with CVD (cardio vascular disease) cost the UK over £6bn, with around 21% of this due to death and 13% due to illness in those of working age. Physical activities like cycling help combat CVD.
- Occasional, regular and frequent cyclists contributed a 'gross cycling product' of c£3bn to the British economy in 2010. Around 3.6 million cycles ('units') are sold in GB each year.
- The average economic benefit-to-cost ratio of investing in cycling & walking schemes is 13:1
- Academics who studied the cost benefit analysis used by Copenhagen to decide whether to build new cycling infrastructure, concluded that cars cost society and private individuals six times more than cycling.
- On average, cycle commuting employees take one less sick day per annum than non-cyclists and save the UK economy almost £83m.
- Although cyclists may spend less than car-borne shoppers per trip, their total expenditure is on average greater because they tend to visit the shops more often.
- On 9th Avenue (Manhattan), where a high quality cycle lane was rebuilt in late 2008, retail sales increased by up to 49%, compared to 3% borough-wide.

3.5 In June 2016, an Arup report found that walkable environments are not just healthier but also wealthier. The research showed a positive correlations between improved walkability, raised local retail spend, enhanced value of local services and goods and the creation of more job

3 www.cyclinguk.org/campaigning/views-and-briefings/cycling-and-economy

4 https://www.arup.com/perspectives/publications/research/section/cities-alive-towards-a-walking-world

opportunities. Their report references research commissioned by Living Streets which showed that making places better for walking can boost footfall and trading by up to 40%. Using sales tax receipts to compare retail activity before and after street redesigns, New York City's Department of Transportation has recently proved that transforming an underused parking area in a pedestrian plaza in Brooklyn has led to a dramatic increase of 172% in retail sales[5]. The Arup report also reminds the reader that walking is a free mode of transport and creating more walkable environments, together with investment in public transport, can reduce congestion costs and provide long-term transport solutions.

3.6 Good design and the reallocation of road space can help bring high streets to life; creating better places with less traffic, more people, and cleaner air, and allowing businesses to flourish. Making our high streets and public places cycle-friendly will make them more vibrant, better places to live, to work, to invest in and to raise children in.

3.7 There is evidence from across London and the UK of the boost in economic performance and retail vitality that people-friendly high streets can benefit from.

- People who access shops by walking or cycling tend to make more trips to the high street, which can lead to higher monthly spends than those who access shops by car.[6] They also tend to shop more locally, which supports local businesses and boosts the local area.[7]
- Improvements to public spaces have been shown to boost footfall by up to 40%.[8]
- High street walking and cycling projects have been shown to increase retail sales by up to 30%.[9]
- Cycle parking can deliver up to 5 times higher retail spend per square metre than the same area of car parking.[10]
- Cycle freight can be cheaper and faster for making deliveries in an urban area. It is estimated that businesses can save between 39% and 64% on the cost of making short deliveries compared to the cost of using a van.[11]
- There is little evidence of a link between increased car parking and greater commercial success in town centres in London. Instead, a good mix of shops and a quality environment are cited as the most important factors in attracting people to town centres.[12]
- International evidence shows that replacing on-street parking with cycle lanes has little to no impact on local businesses, largely due to businesses overestimating how many of their customers arrived by car. In many cases, there was a positive impact on local businesses.[13]

3.8 Inactivity– Health and well being

3.9 Haringey, like the rest of the UK, is in the midst of an inactivity crisis. Changes to how we work, how we travel, and other social changes have designed physical activity out of our lives. We need to build physical activity back into our daily lives and routine. Enabling more journeys to be made in Haringey by walking and cycling will achieve this.

5 https://ww.livingstreets.org.uk/policy-and-resources/our-policy/high-streets

6 Cycling and the economy, Cycling UK, 2016 http://www.cyclinguk.org/campaigning/views-and-briefings/cycling-and-economy

7 The Mayor's Vision for Cycling in London, GLA, 2013 https://www.london.gov.uk/file/1994

8 The pedestrian pound: the business case for better streets and places, Living Streets, 2014 https://www.livingstreets.org.uk/media/1391/pedestrianpound_fullreport_web.pdf

9 The pedestrian pound: the business case for better streets and places, Living Streets, 2014 https://www.livingstreets.org.uk/media/1391/pedestrianpound_fullreport_web.pdf

10 The value of cycling: rapid evidence review of the economic benefits of cycling, Department for Transport, 2016 https://www.gov.uk/government/publications/the-value-of-cycling-rapid-evidence-review-of-the-economic-benefits-of-cycling

11 The value of cycling: rapid evidence review of the economic benefits of cycling, Department for Transport, 2016 https://www.gov.uk/government/publications/the-value-of-cycling-rapid-evidence-review-of-the-economic-benefits-of-cycling

12 The relevance of parking in the success of urban centres, British Parking Association, 2012 http://www.londoncouncils.gov.uk/services/parking-services/parking-and-traffic/parking-information-professionals/review-relevance

13 The complete business case for bike lanes, CityLab, 2015 http://www.citylab.com/cityfixer/2015/03/the-complete-business-case-for-converting-street-parking-into-bike-lanes/387595/

It will also support the borough's health recovery from Covid-19 through, for example, improved air quality to support better respiratory health.

3.10 Haringey has a young, ethnically diverse population. The total resident population in Haringey is 271,222[14]. Our population is expected to increase by 5% by 2030, to 284,989, with the largest percentage growth in older age groups (65+). The borough is also the 4th most deprived borough in London, with deprivation more concentrated in the north east.

3.11 Health and wellbeing in Haringey:

- Over 1 in 5 adults (21.9%) are inactive and do less than 30 minutes exercise a day
- Healthy life expectancy is 65 years for men and 64.5 for women. Healthy life expectancy reduces by 15 years for women and 17 years for men living in our most deprived areas compared to those living in the most affluent parts of the borough.
- Almost 1 in 2 adults are overweight or obese (49.9%). In addition to this, over 1 in 5 children (22%) aged 4-5 and over 1 in 3 children aged 10-11 are obese or overweight (36.7%).
- 1 in 5 adults in Haringey have high blood pressure and a third of our residents are not getting enough physical exercise
- Around 19,900 people in Haringey or 7.7% of the GP registered population, are diagnosed with depression, not significantly different to the London average

3.12 In 2019, Haringey adopted its 'Active Together' – A Physical Activity and Sport Strategy', the vision of which was to create and embed a culture of activity so that Haringey becomes one of the most physically active and healthy London boroughs. According to the Strategy, physical activity can contribute towards a wide range of socio-economic outcomes. The health and well-being benefits associated with being physically active are:

- Reducing the risk of coronary heart disease and stroke by 35%.
- Reducing the risk of developing diabetes and colon cancer by 50% and breast cancer by 20%.
- Reducing the risk of an early death by 30%.
- Tackling obesity and maintaining a healthy weight.
- Reducing the risk of developing depression, dementia, stress, and anxiety by 30%.
- Reducing loneliness and social isolation.
- Improving mobility and balance, reducing the risk of osteoarthritis by 83% and falls by 30%.
- Enhancing confidence, self-efficacy, transferable skills and employment opportunities.
- Offering effective diversionary activities for young people vulnerable to risky behaviours

3.13 Walking and Cycling is a key focus of Haringey's Early Help and Prevention Programme and Haringey's Physical Activity and Sports Strategy. Increasing physical activation is key in addressing long standing heath inequalities that exist amongst those from more deprived communities in Haringey. Haringey's Early Help and Prevention programme recognises physical activity as key in preventing ill health, and supporting people to age well.

3.14 Haringey's Health and Wellbeing Strategy 2020 lists the proportion of journeys made through walking and cycling as a key outcome of the strategy. The physical features of a place influence the health of residents in many ways. Air quality, communal facilities, good quality housing and green spaces all contribute to healthy, connected communities and prevention of mental and physical long-term conditions. The strategy's vision for Haringey is that it will be a clean, green and safe borough where people of all ages want to live, work and play, now and in the future.

3.15 Designing and planning future major public developments in Haringey to maximise health and wellbeing of residents – including promoting active travel and social connectedness is a priority of the strategy which can be delivered through this WCAP.

3.16 Air Quality and Climate Change

3.17 Transport is the third largest source of emissions in the borough. Whilst low carbon forms of motorised transport do exist, there are still air quality issues associated with these solutions (e.g. tyre wear and braking).

3.18 Air quality is the measure of how clean our air is or how much pollution there is in the air we breathe. The link between travel choices and air quality is direct. Motorised road transport accounts for about half of the particulate matter and nitrogen dioxide which are two of the main sources of air pollution attributed in cities In response to clear scientific evidence and consensus on climate change, and rising public concerns, Haringey Council declared a Climate Emergency in March 2019, being one of the first London Councils to do so.

3.19 Walking and cycling can bring large improvements in air quality and help deliver the actions necessary to meet our climate change challenge. Modal shift away from motorised transport will reduce greenhouse gas emissions from transport and reduce our overall carbon footprint which is key to avoiding to extreme weather events, loss of life around the world, and dangerously high levels of CO2 concentrations. Active travel behaviour change initiatives, such as cycle training, anti-idling campaigns, school travel planning, will support a green recovery in the borough from the Covid-19 crisis.

3.20 Social Justice

3.21 Enabling more cycling and walking and tackling the use of the private car are social justice issues. As mentioned above, transport is third largest source of emissions in the borough yet only 40%15 of Haringey households have a car and this figure is falling. Car ownership is particularly low in parts of the borough where deprivation is more concentrated. The council is also aware that most of the vehicle traffic in the borough has neither started its journey in Haringey nor is it destined for Haringey. Transport poverty is a reality for many residents in Haringey on lower incomes who struggle with the cost of car ownership and public transport and therefore take active travel modes as part of their daily routines and need these modes to be safe.

3.22 Inequalities also exist by gender, age, ethnicity, disability and other protected characteristic groups identified in the Equality Act 2010.

14 www.haringey.gov.uk/local-democracy/about-council/state-of-the-borough

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3.23 . Research16 by CyclingUK found that men do nearly three times as many cycling journeys as women, and travel more than four times as far. TfL's 2016 Attitudes to Cycle report17 found that 'regular cyclists are more likely to be men, white, working and non-disabled – 20% of men report being 'regular' cyclists compared with 8% of women'. A research report by Sustrans titled 'Women, reducing the gender gap'18 found that most women don't feel safe and are hesitant to start cycling, Women reported that they feel intimidated on the roads.

3.24 Disabled people face significant barriers to walking and cycling. The most common physical barrier to walking is crossing the road. Having enough time to cross, not finding a safe place to cross the road, signalised crossings that do not work, are all barriers. Obstructions, advertising boards, wheelie bins and parked cars, are commonly encountered and make walking difficult. The most common barriers to cycling among disabled people are lack of appropriate equipment, low availability of safe cycling infrastructure and lack of confidence and support.

3.25 The Mayor of London's 'Vision for Cycling' 201319 revealed that similar numbers of people from white, black and mixed ethnic groups cycle regularly, whilst people from an Asian background cycle less. People of Black and Asian ethnicity are more likely to never cycle at all compared to all other ethnic groups.

3.26 This WCAP is needed to enable those who don't have a car to have a safe travel choice and at the same time advance equality of opportunity by addressing the barriers faced by all. The WCAP will deliver safer and healthier streets, improved health from being enabled to take up active travel options and from improved air quality which will benefit all residents in Haringey

15 https://tfl.gov.uk/corporate/publications-and-reports/travel-in-london-reports

.https://www.cyclinguk.org/article/campaigns-guide/women-cycling

16 https://tfl.gov.uk/corporate/publications-and-reports/cycling-and-walking

17 https://www.sustrans.org.uk/our-blog/opinion/2019/january/how-can-we-challenge-the-cycling-gender-gap

18 www.london.gov.uk/what-we-do/transport/cycling-and-walking/mayors-vision-cycling



4. Walking in Haringey today

4.1 Walking is, in many ways, the mode of travel that is most important to the aims of this Action Plan. It makes efficient use of street space. It is good for individuals' health. It produces no emissions or noise. It is safe and encourages interaction, which improves lives. It is good for business.

4.2 Walking for leisure is also an important part of living in Haringey for many. We have many excellent green and open spaces located throughout the borough and in the areas around us. These walking assets include Parkland Walk, Railway Fields, Tottenham Marshes, canals and parks. These spaces are popular places for people to walk and also provide vital green steppingstones between our town centres, however not all are accessible by walking and improved access is needed to enable more walking to these spaces.

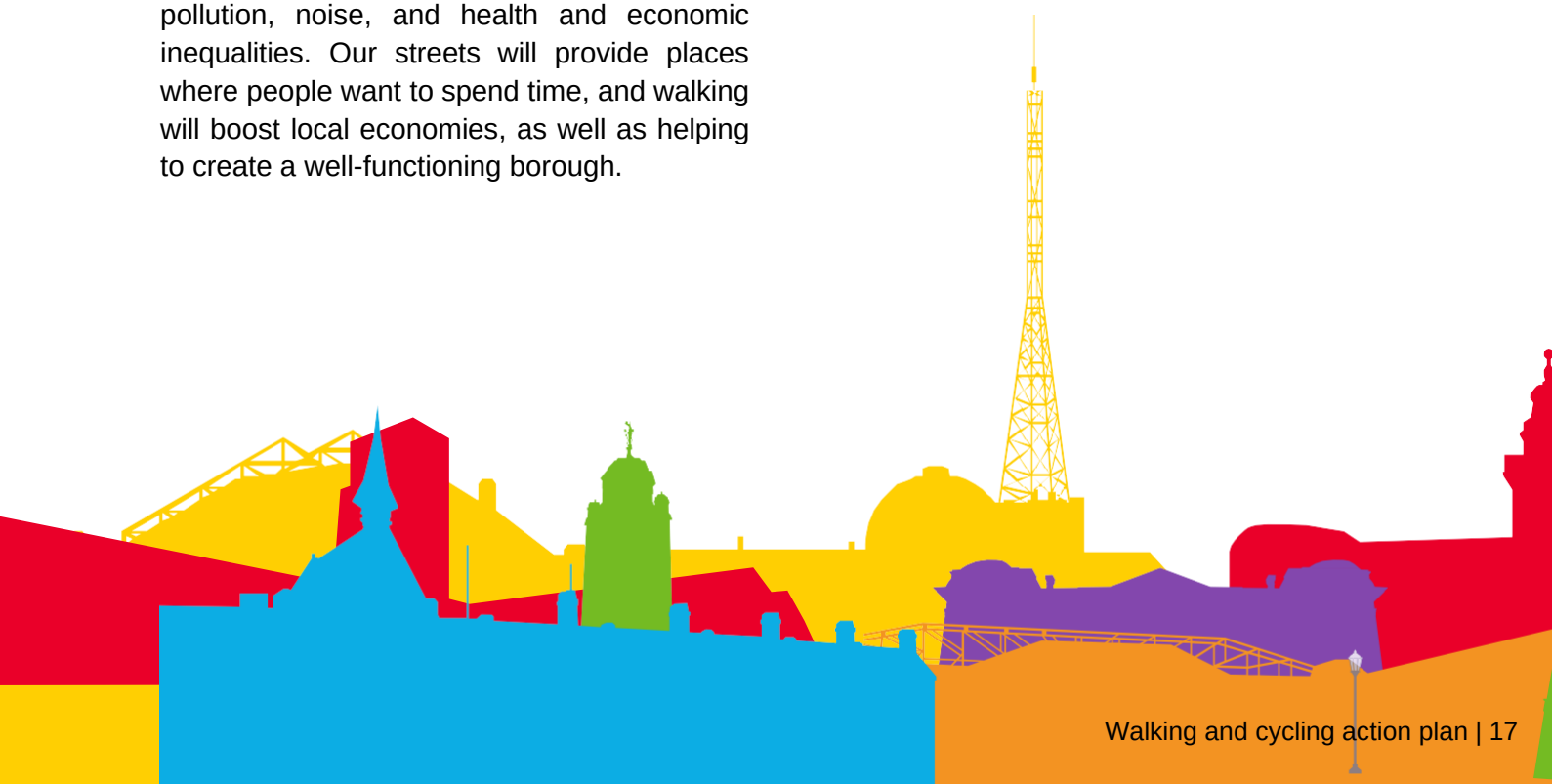
4.3 Enabling more people to travel on foot will make Haringey's streets more efficient. A better walking environment will help connect communities and reduce road danger, air pollution, noise, and health and economic inequalities. Our streets will provide places where people want to spend time, and walking will boost local economies, as well as helping to create a well-functioning borough.

4.4 **Walking Potential**

4.5 The London Travel Demand Surveys (LTDS) outputs summarise walking potential based on existing travel behaviours. The survey identifies trip stages that could be reasonably walked or

cycled but are currently made in private vehicles. The LTDS collects travel pattern data from c.17,000 persons a year and includes details of all trips undertaken on the day before the interview. Trips and stages made by car, public transport and other modes from 2014/15 to 2016/17 are included in the dataset.

4.6 The highest levels of increased walking potential in Haringey are A1010 corridor between Bruce Grove and White Hart Lane, Muswell Hill, Crouch End, and Wood Green.



4.7 Walking for leisure

4.8 Walking for leisure in Haringey is a popular pastime and one we would like to enable more people to enjoy. Working with partners we have developed guidance[20] and information on walks inside and out of the borough. This includes walks that follow the Moselle River by Haringey Friends of Parks forum, a cafe trail, Parkland Walk between Highgate and Finsbury Park and our Walk in the Park guide. The guide, produced with partners, includes a series of orbital and linear walks through our borough's greenspaces, open spaces and historical places.

Walking and public transport

4.9

4.10 Expanding the public transport network and improving the experience of using public transport will increase levels of walking, as much walking takes place as part of a longer public transport journey. A significant amount of walking occurs around public transport interchanges, and therefore walking should be well integrated with the public transport system

20 https://www.haringey.gov.uk/parking-roads-and-travel/travel/walking



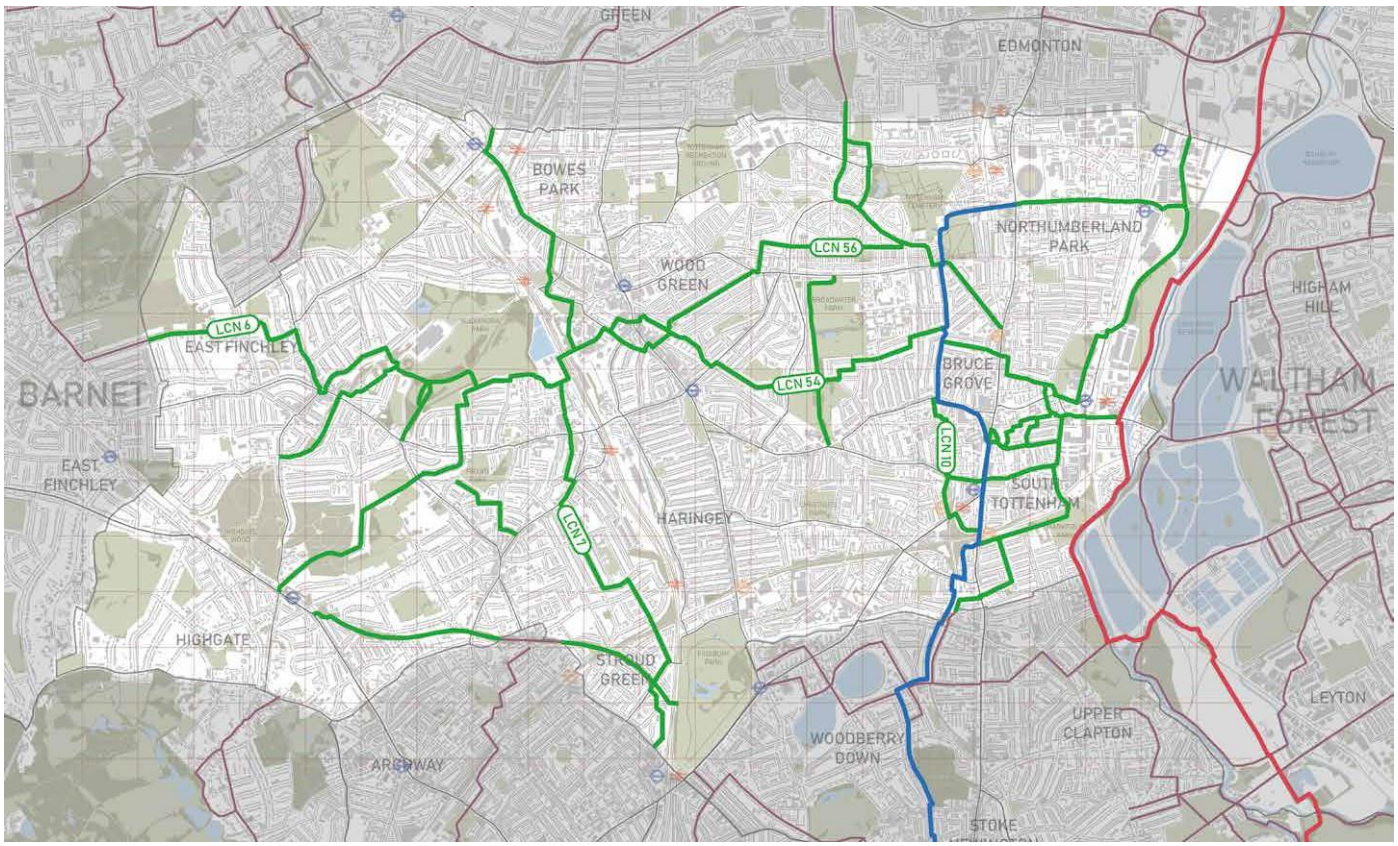
5. Cycling in Haringey today

5.1 Cycling is a popular way to get around in Haringey and becoming increasingly so in recent years. Over the past 10 to 15 years, there has been a significant increase in the number of cycle trips and cycling modal share in London; there has been a 130% increase in cycling trips in London since 2000[21]. This has also translated into more cycle trips and increased modal shift in Haringey.

5.2 There are lots of places to cycle in Haringey and many more destinations outside the borough that are easily within cycling distance, including the majority of central London.

5.3 Existing network

5.4 The existing cycle network in Haringey consists primarily of painted cycle lanes marked on major roads and residential streets. The network does however include Cycle Superhighway 1 (CS1), part of Transport for London's Cycleway network which links the east of the borough with the city via Hackney.



Existing Cycle Network

LBH Signed Cycle Routes | Cycle Superhighway | Neighbouring Borough Cycle Routes | National Cycle Network 1 (NCN1)

21 Travel in London Report 9 published by TfL in 2016

5.5 The plan above summarises the Borough's existing cycle network and also identifies cycle routes in neighbouring boroughs. The network is largely comprised of routes using quieter residential streets and open spaces, and most of these routes are signposted as part of the London Cycle Network (LCN). The Borough's two key strategic cycle routes are Cycle Superhighway 1 (CS1) and National Cycle Network (NCN) Route 1. The list below summarises key cycle routes within the Borough including NCN Route 1 and CS1:

- LCN 6: Barnet – Alexandra Palace – Hornsey – Camden – West End (Total Length = 19km)
- LCN 7: Elephant & Castle – City – Finsbury Park – Wood Green – Southgate (Total Length = 14km)
- LCN 10: City – Tottenham – Enfield – Cheshunt (superseded by CS1 in sections) (Total Length = 17km)
- LCN 54: Alexandra Palace – Wood Green – Tottenham – Walthamstow (Total Length = 18 km)
- LCN 56: Wood Green – Northumberland Park (Total Length = 5km)
- National Cycle Network 1 (NCN 1) – Dover – London – Harlow - Colchester (Total Length = 396km)
- Cycle Superhighway 1 (CS1) – City – Hackney – Stamford Hill – Seven Sisters - Tottenham

5.6 In addition, the borough also has a number of routes through areas of green space that provide traffic free alternatives mainly during daylight hours.

5.7 Connections into neighbouring boroughs include CS1 into Hackney and the newly constructed segregated cycle tracks at Ferry Lane.

5.8 **Focus on Cycle Superhighway (CS1)**

5.9 CS1 links the heart of Tottenham via the south of the borough, into Hackney and the city of London. CS1 is Haringey's flagship cycle route. It is a combination of two-way cycle track located on wide footways and sections of on road cycling on residential streets. Unfortunately the traffic conditions on these sections are hostile and deter most cyclists from using the route. Part of the route also provides shared space conditions which are not optimal for encouraging people to cycle. Currently CS1 does not connect into Enfield, ending south of the Tottenham Hotspur Spurs Stadium. This is something the WCAP seeks to rectify.

5.10 Prior to the Covid-19 pandemic we conducted a review of CS1 as part of the development of this WCAP. This review has helped inform the WCAP proposals and has been used as the basis of a proposal for improvements from the Covid-19 initiated Streetspace for London programme.

5.11 **Gaps in the cycle network**

5.12 Mesh Density Analysis was used to evaluate the distribution of the Borough's current cycle network using a 400m x 400m grid. The Mesh Density Analysis is included in the London Cycle Design Standards (2015) and is used to review the density of cycle networks – the standards recommend that cyclists should not have to travel further than 400m to reach a high quality route. The analysis does not consider the quality of the existing facilities and should be used to understand areas within Haringey where there are currently no facilities.

5.13 The analysis identifies gaps in the Borough including four larger areas where there is not a cycle route within 800m: Harringay and St. Ann's, Crouch End, White Hart Lane, and Alexandra. Within these gaps there are also key corridors which have no cycle route or facilities. These include parts of Seven Sisters Road, Tottenham High Road and Archway Road.

5.14 Guardrail removal

5.15 Guardrails can pose a significant hazard to cyclists, particularly on left turns, as they leave nowhere for cyclists to go if they find themselves on the inside of a vehicle. The borough will seek to remove these where possible.

5.16 Cycling for leisure

5.17 Cycling is a popular pastime in the borough as well as being a popular mode of transport. Whilst cycling for leisure often involves a ride through green space or quieter streets the conditions need to be right on these routes in the same way they need to be on a busy commuter route.

5.18 We have included access to green space in our analysis of the borough as part of the development of this WCAP and have ensured the green grid, our developing plans for a network of walking and cycling routes into areas of green space, is included in the network developed

5.19 Cycle parking

5.20 Having a safe place to leave your bike is an essential part of the cycling journey and is just as important as having a safe route. Without the correct cycle parking provision this can be a barrier to cycling and will put people off cycling.

5.21 Without increased provision of the correct types of cycle parking, in the correct locations, further cycling growth will be limited. We have installed over 1,500 publicly accessible on-street cycle parking spaces. These have been installed along town centres, outside shops, doctors surgeries, local underground and rail stations.

5.22 Whilst the cycle parking provision in the borough has increased year on year it has been implemented as part of other projects and not looked at with a holistic approach. Across London there is currently a widespread lack of sufficient



cycle parking stands and secure facilities and this is a barrier to cycling, as TfL's new cycling parking strategy makes abundantly clear.

5.23 TfL estimates that London needs an additional 36,000 more on-street cycle parking spaces, on top of 145,000 existing ones, just to satisfy existing demand.

5.24 In London more than 20,000 cycle thefts are reported each year and unreported thefts could be much higher according to the police. The TfL cycle parking strategy suggests that "25 per cent of people who cycle, and 22 per cent of people who don't, are put off cycling in London for fear of cycle theft. When theft occurred, 34 per cent of victims said they had stopped cycling altogether, or temporarily, as a result."

5.25 Cycle Parking at Stations

5.26 People cycling arriving at stations need to have the confidence that they can park their bike securely near to a station and catch a tube or train rather than find that all stands are filled and have to search far beyond the station to park their bikes. Whilst some of our stations have reasonably good on street parking nearby most are lacking any dedicated facilities for people leaving their cycles at the station to continue their journey to work. We have identified the need for cycle hubs at transport interchanges and this project forms part of the WCAP delivery plan.

5.27 Cycle Parking at Home

5.28 Storing at home for residents who do not have the space, particularly in smaller properties, can be a challenge. This regularly results in cycles being stored on balconies and in hallways creating further access and fire safety issues. In order to address this, we have already delivered 93 bike hangars in the borough providing 558 residents a safe, secure and convenient place to store their bike. Our hangars take up just half a car parking space and offer a cost effective and efficient use of highway space. Increasing the Delivery of cycle hangars continues to be a priority as outlined in the WCAP delivery plan.

5.29 The cost of a space in a hangar is one of the lowest rates in London which is the equivalent to just £3 a month. The council currently has over 1,000 outstanding requests for bike hangar spaces. Locations for new hangars are primarily chosen based on where there is the most demand. Spaces in a bike hangar are allocated on a first come first served basis with a maximum of two per person. On housing estates, we are working to deliver cycle parking solutions for residents.



5.30 Cycle Parking at Destinations

5.31 Like most places the quality and quantity of cycle parking in Haringey in town centres and other destinations varies, and in most places could be increased and improved. Cycle parking introduced on street in Haringey is primarily 'Sheffield stands' or similar located on the footway.

5.32 Cycle Parking for Schools and Colleges

5.33 As part of the wider active travel programme we are working with schools, colleges and places of further education in the borough to identify and source funding to we deliver cycle parking for students and teachers.

5.34 Cycle training

5.35 It sounds very simple but you can't cycle if you don't know how to. Cycle training is a vital part of our active travel provision from children learning to ride a bike for the first time to adults who want to get back into cycling.

5.36 Cycle training is available[22] for anyone who lives, works or studies in the borough. We receive funding for cycle training from Transport for London as part of the Local Implementation Plan and through additional funding streams that support cycling. To book a training course, residents can visit the Cycle Confident – Haringey webpage[23], find the right course and sign up.

5.37 Haringey has provided cycle training to significant numbers of adults and children in recent years. As can be seen in the table above these numbers have actually reduced from 2017/18 levels, in part due to the ceasing of the Borough Cycling Programme which provided funding for cycle training and cycle parking. We have however continued to fund cycle training through the LIP to ensure this vital service continues.

Cycle training in Haringey 2017-2020

	Type of training	17/18	18/19	19/20
Cycle training - adults	Number of adults trained to 'Basic' cycle skills (Level 1)	222	241	183
	Number of adults trained to 'Urban' cycle skills (Level 2)	112	137	98
	Number of adults trained to 'Advanced' cycle skills (Level 3)	64	45	25
Cycle training - children	Number of children trained to Bikeability level 1	1176	811	1032
	Number of children trained to Bikeability level 2	758	451	455
	Number of children trained to Bikeability level 3	169	0	9

5.38 Cycling potential

5.39 There are millions of short trips every year that are currently driven that could be walked or cycled. The trips that are most easily switched are short trips taken by individuals not carrying much with them and not travelling very far (under 5 kms). There are lots of trips in Haringey that could be switched from private car to active travel. The key concentrations of potential switchable trips are focussed around: Wood Green, Seven Sisters, A1010 corridor between Bruce Grove and White Hart Lane, and Muswell Hill



22 https://www.haringey.gov.uk/parking-roads-and-travel/travel/cycling

23 https://www.cycleconfident.com/sponsors/haringey/

6. Barriers

6.1 What are barriers to active travel?

6.2 As with most places, there are existing barriers to active travel in Haringey. These barriers can cause severance to routes that would otherwise be good for walking and cycling or can prevent people walking or cycling for a whole host of reasons. They can be both real and perceived, physical and psychological, and sometimes even cultural or financial. We can address most of the physical barriers through changes to the ways streets function or by enabling people to use a combination of different transport modes to complete journeys.

6.3 Existing infrastructure barriers in Haringey fit broadly into 4 main categories. They are:

- Roads managed by Transport for London (the TLRN)
- Borough main roads
- Railway lines
- Parks and open spaces
- Severance + Barriers to Movement

6.4 Providing continuous, accessible and intuitive walking and cycle routes is essential in the development of successful networks. Severance and barriers to movement can become major factors in influencing the ability to follow routes. It is important therefore to identify sources of severance and to consider how their impact to routes can be reduced or removed. For the purposes of the action plan, severance has been broadly summarised below.

6.5 TfL's Playbook analysis also identifies severance based on barriers to pedestrian movement using vehicle flow and road width data, and this is also shown in the plan.

6.6 Hard Severance: typically refers to structural, topographical or geographical features that physically prevent or restrict continuation of a route. The key examples of severance encountered in Haringey include railway structures, waterways and grade-separated highways.

6.7 Soft Severance: refers to features that impact upon the continuity of routes but do not necessarily stop the route altogether and are therefore easier to negotiate. Examples of soft severance in Haringey include major highways and open spaces.

6.8 Bottlenecks: Bottlenecks are gaps in severance features that are critical to the permeability of an area affected by severance. Bottlenecks often form the only route through severance and so the design and feel of these features is crucial. Bottlenecks in Haringey are generally associated with the north-south viaduct trainlines which result in limited crossing opportunities of the railways.

6.9 Understanding the location and impact of severance is important for developing the action plan and identifying the routes that need the most support to overcome these challenges and from a neighbourhood perspective the areas (known as traffic cells) between them.

6.10 Additionally, some local roads and even residential streets can be barriers to active travel due to the conditions created by heavy and fast traffic.

6.11 These streets can sometimes have as big an impact in severing parts of the borough from each other for walking and cycling trips.

6.12 They include but are not limited to:

- Geography and environment including topography (the hills of Haringey)
- Road danger
- Confidence and knowledge
- Cultural perceptions and views
- Personal safety
- Accessibility
- Access to public toilets
- Affordability

6.13 We can't do much about the hills but we can make walking and cycling up them more attractive by making it safer and more fun. This section explores some of the existing physical barriers to active travel in the borough. We strive to address cultural and social barriers through our behaviour change and active travel work discussed in later sections of this document.

6.14 Public toilet provision is key to encouraging people to get out and about and walk. There is a map of toilets on the council website at: https://www.haringey.gov.uk/parking-roads-and-travel/roads-and-streets/public-toilets/map-public-toilets-haringey that you could reference or use. The council will work across service areas to improve this provision.

6.15 **Topography**

6.16 Haringey is a notoriously hilly Borough and its topography is a key influence upon levels of walking and cycling. The below plan summarises ranges of topography in 100ft increments and illustrates how much this varies across Haringey with the west of the Borough dominated by steep inclines whilst the eastern half of the Borough is much flatter and mainly within the river basin.

6.17 Topography can have a polarising impact upon walking and cycling; hilliness can be a deterrent to increased levels of walking and cycling, but conversely flatter terrains are much more attractive. The impact of topography will be a key consideration in the development of the Borough's action plan and will be considered alongside other key barriers to movement including severance and bottlenecks. Air Quality

6.18 The quality of environment along streetscapes can have a significant impact upon propensity to walk and cycle. NO2 concentration levels are one of the key determinants of air and environmental quality – NO2 concentrations are often associated with vehicle emissions and therefore are generally higher alongside roads



6.19 Haringey has some of the areas worst affected by poor air quality and there are two key areas with particularly high levels of NO_2 concentrations. The junction of the High Road/Seven Sisters Road/West Green Road has the highest concentrations in the Borough and is within the top 2% of London for NO_2 mean levels.

6.20 **Road Danger**

6.21 Like most parts of London, road danger is an issue that impacts on everyone but disproportionately impacts people who walk and cycle and discourages those who do not from doing so.

6.22 We work with partners including Transport for London and the Metropolitan Police to address issues associated with road danger through programmes such as Vision Zero, the safer junctions programme, introducing 20mph speed restrictions and traffic calming.

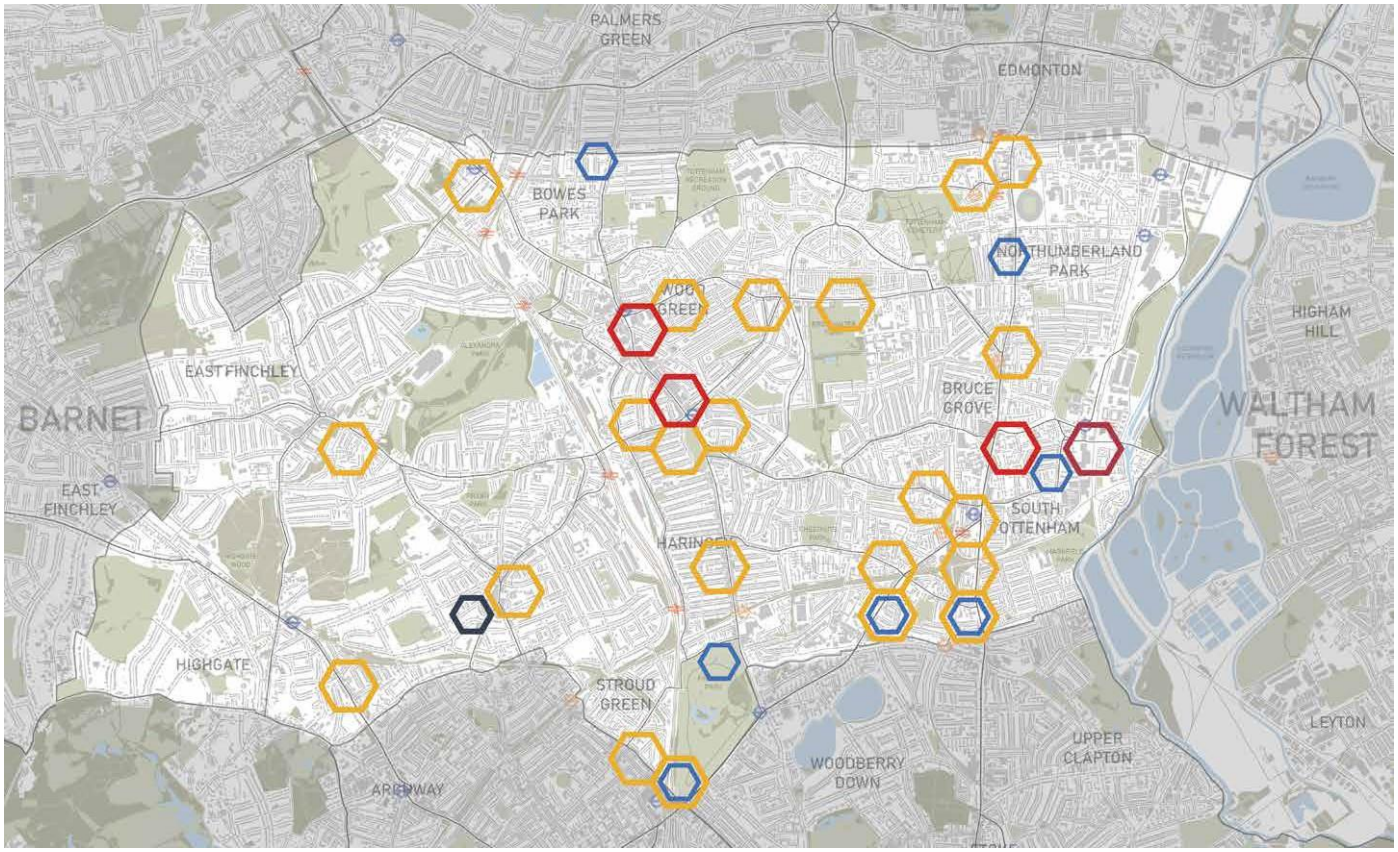
6.23 We know that the issue of road safety is much broader and complex than just people getting hurt through collisions. Fast traffic, fear of being involved in collisions, and generally dangerous or aggressive driver behavior is one of the key barriers to people cycling and often walking more too. It's also one of the key reasons why protected space for people cycling is so important as it removes this psychological barrier.

6.24 Adopting an approach of looking at places people feel it is dangerous walking and cycling as well as where collisions happen will give us the much- needed broader view of road danger in the borough. That has become increasingly apparent during the Covid-19 lockdowns.

6.25 The WCAP will sit alongside the Council's Road Danger Reduction Action Plan (RDRAP) – a document that sets out how the Council is applying the Vision Zero Strategy compiled by the Mayor of London, Transport for London and the Metropolitan Police. The RDRAP articulates how, subject to funding, the Mayor of London's aspiration for the capital can be delivered locally by having no-one killed or seriously injured (KSI) casualties on Haringey's roads by 2041. The Road Danger Reduction Investment Plan for 2022/23 sets out how the Council will commence the implementation of the Action Plan. Together, the WCAP and the RDRAP will contribute to the shared objective of improving safety for all.

6.26 **Collisions**

6.27 The collision plan below summarises KSI (Killed or Seriously Injured) collisions over a three-year period between 2015-17 which involved pedestrians and/or cyclists. Understanding collision data provides an overview of key areas in the Borough where there are potential safety issues for pedestrians and cyclists.



Pedestrian + Cycle KSIs (2016 - 17)

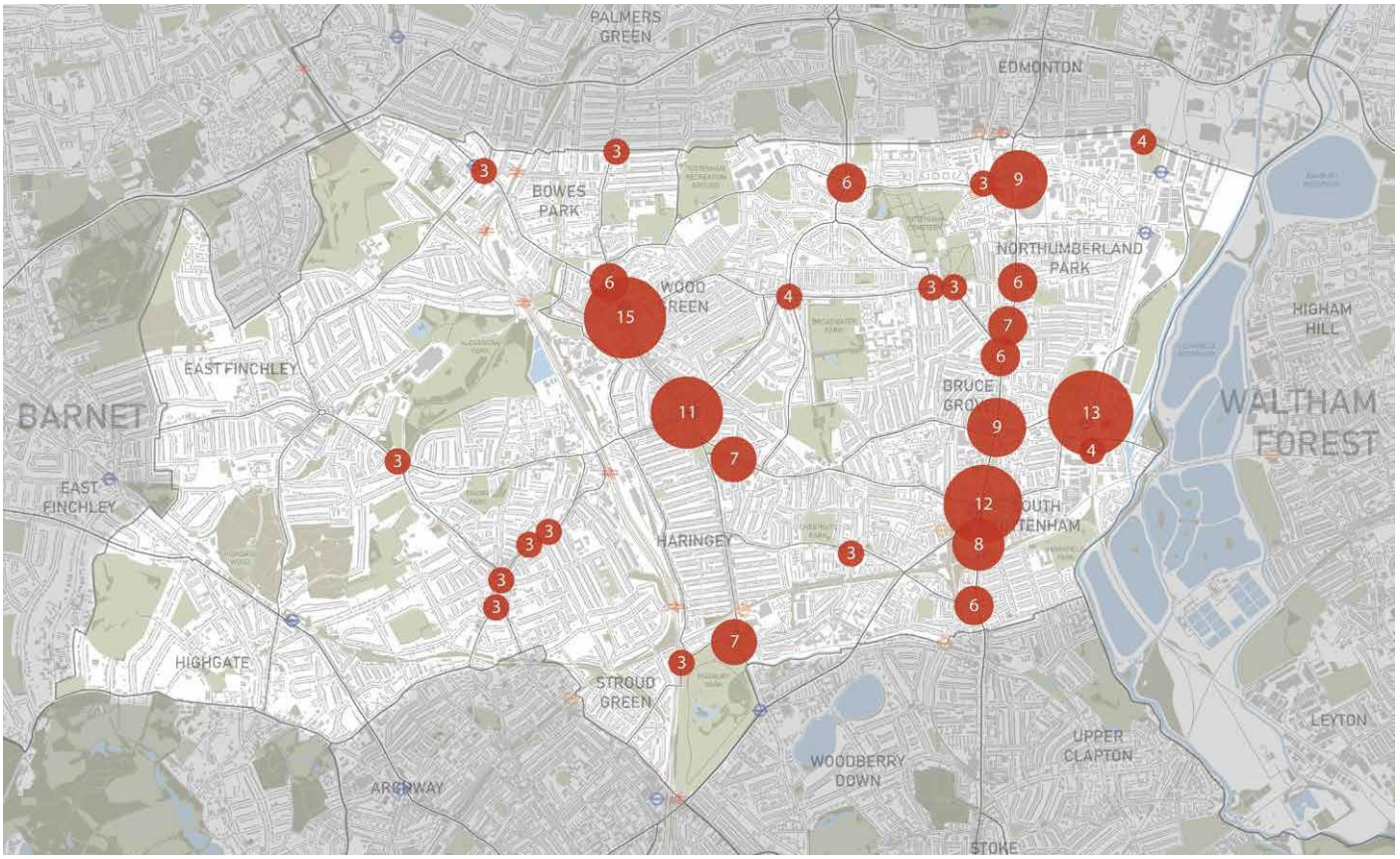
- 13 - 7 Pedestrian KSIs
- 6 - 4 Pedestrian KSIs
- 4> Pedestrian KSIs
- 6 - 4 Cyclist KSIs
- 4> Cyclist KSIs

6.28 It is worth noting however that Collision Data only records incidents in which the police responded and therefore should not be considered as a comprehensive reflection of all safety issues. The plan identifies several clusters within the Borough where there was a combination of walking and cycling collisions, including: South Tottenham/ Tottenham Hale, Wood Green and Turnpike Lane.

6.29 **Collisions at junctions**

6.30 The plan below (Collision Hotspots 2016-18) summarises TfL collision hotspots at junctions within the Borough involving pedestrians and cyclists between 2016-2018. In doing so, the analysis identifies several points within Haringey where there was a higher number of collisions involving pedestrians and cyclists.





Collision Hotsports: Junctions (2016 - 18)

Number of Collisions

6.31 The plan also identifies corridors within the Borough where there was a cumulation of collisions at junctions along those routes. The table summarises all collisions in the Borough where there were more than four collisions between 2016-18.

Junction	TfL or Borough	Pedestrian Casualties	Cycle Casualties	Total Casualties
HIGH ROAD (N22)/LORDSHIP LANE	BOR	14	1	15
NORTH-SOUTH ROUTE/FERRY LANE	BOR	12	1	13
HIGH ROAD (N15)/WEST GREEN ROAD	TLRN	7	5	12
HIGH ROAD (N22)/TURNPIKE LANE	BOR	7	4	11
HIGH ROAD (N15)/PHILIP LANE	TLRN	8	1	9
HIGH ROAD (N17)/WHITE HART LANE	BOR	5	4	9
HIGH ROAD (N15)/SEVEN SISTERS ROAD	TLRN	3	5	8
WEST GREEN RD/HARRINGAY RD	BOR	5	2	7
HIGH ROAD (N17)/DOWSETT ROAD	BOR	5	2	7
ENDYMION ROAD / GREEN LANES	BOR	0	7	7
BRUCE GROVE/HIGH ROAD (N17)	TLRN	6	0	6
HIGH ROAD (N15)/ST ANNS ROAD	TLRN	3	3	6
GREAT CAMBRIDGEROAD/WHITEHARTLANE	TLRN	3	3	6
LORDSHIP LANE/HIGH ROAD (N17)	BOR	1	5	6

FERRY LANE/FAWLEY RD	BOR	2	2	4
LORDSHIP LANE/THE ROUNDWAY (WEST)	BOR	1	3	4
BRANTWOOD RD/WILLOUGHBY LANE	BOR	1	3	4
THE HALE/BROAD LANE	TLRN	3	0	3
BOUNDS GREEN RD/PARK AVENUE	BOR	3	0	3
HIGH ROAD (N17)/MONUMENT WAY	TLRN	3	0	3

6.32 Corridor Collision Analysis

6.33 The plan below (Collision Hotspots: Links 2016-18) summarises corridors in the Borough where there were the highest number of collisions per km between 2016-18 and more detail is provided in the table below.



Collision Hotsports: Junctions (2016 - 18)

Number of Collisions per km

6.35 The number of casualties per km has been calculated to enable comparison of the collision rates and highlights Green Lanes and the High Roads as the corridors with the highest number of collisions involving pedestrians and cyclists.

Road Section	TFL or Borough road	Casualties rates (casualties per km)	Number of casualties
GREEN LANES	BOR	62	20
HIGH ROAD (N22)	BOR	55	49
HIGH ROAD (N17)	TFLN	55	77
GREEN LANES	BOR	55	91
HIGH ROAD (N22)	BOR	43	36
LORDSHIP LANE	BOR	35	5
HIGH ROAD (N17)	BOR	35	22
TURNPIKE LANE	BOR	32	24
HIGH ROAD (N15)	TFLN	30	17
HIGH ROAD (N15)	TFLN	30	36
HIGH ROAD (N22)	BOR	28	23
SEVEN SISTERS	TFLN	27	48
LORDSHIP LANE	BOR	27	47
GREEN LANES	BOR	26	37
CROUCH END HILL	BOR	25	21
GREEN LANES	BOR	25	10
HIGH ROAD (N22)	BOR	24	54
HIGH ROAD (N17)	BOR	24	2
WEST GREEN ROAD	BOR	21	62
BRUCE GROVE	TFLN	21	32



7. Walking in Haringey in the future

7.1 We want walking to be the natural choice for people who are able to in Haringey. We have a great choice in local centres, amenities and venues we can walk to, green spaces we can enjoy a leisurely stroll of, and even neighbouring parks to wander into.

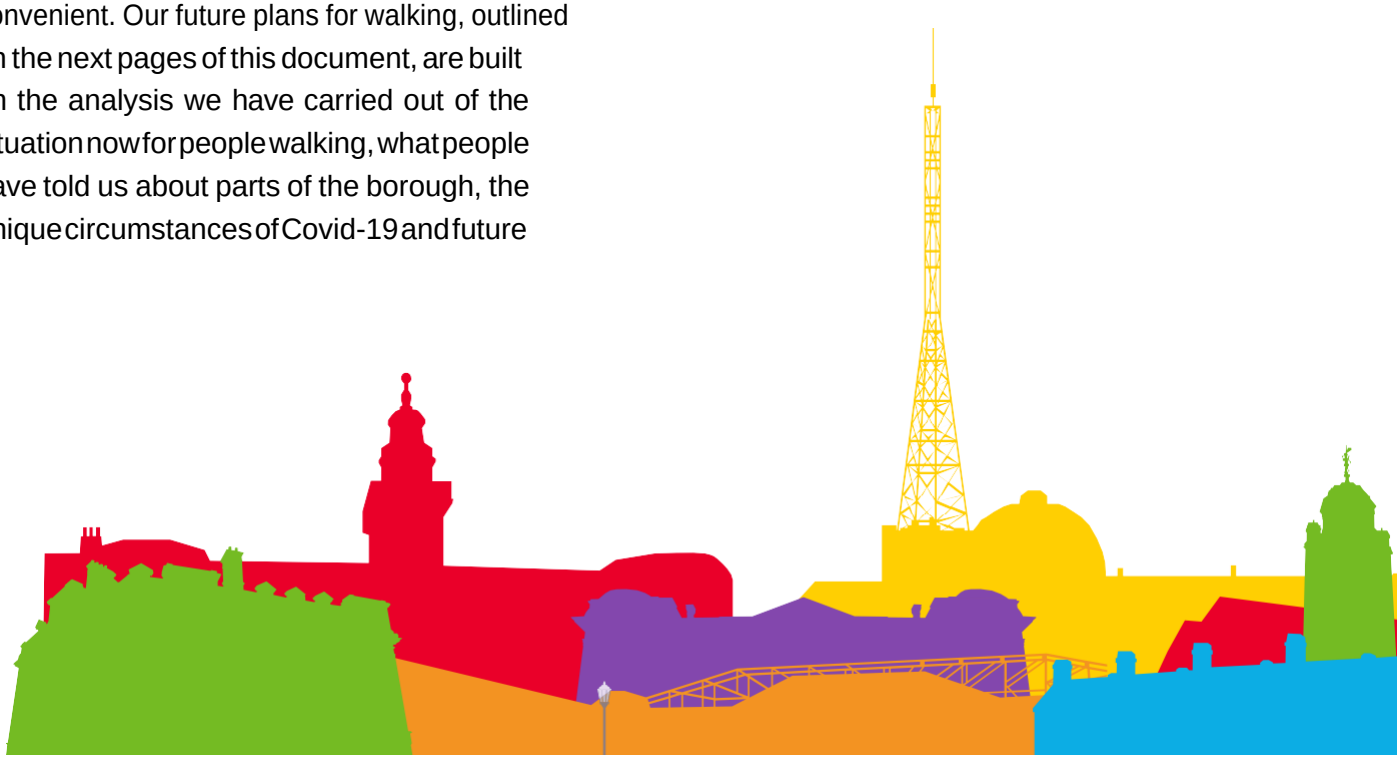
7.2 During the lifecycle of this WCAP we will start to get back to normal, from the changes to day to day life brought about by the Covid-19 global pandemic. However, the period of lockdown and the changes it brought to the way people lived their lives, have given a renewed focus of the importance of being able to make local walking journeys. This includes the priority we give people walking where they meet people moving in cars and the amount of space we give to people walking versus the amount of space we give to parked cars.

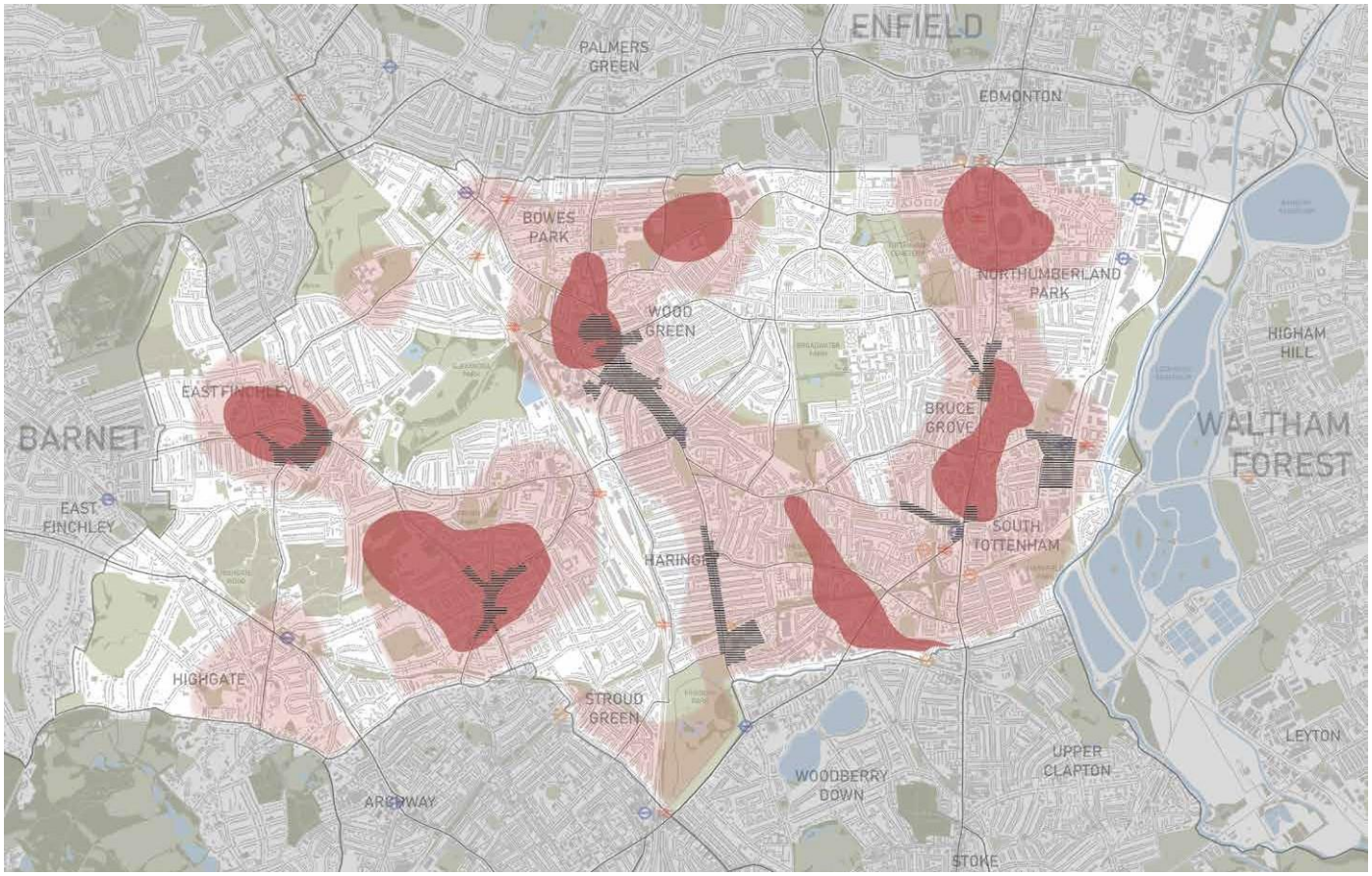
7.3 For people to walk as part of their daily routine, walking routes and street layouts and public spaces need to be safe, direct, attractive and convenient. Our future plans for walking, outlined on the next pages of this document, are built on the analysis we have carried out of the situation now for people walking, what people have told us about parts of the borough, the unique circumstances of Covid-19 and future development both confirmed and proposed.

7.4 Our work programme for walking is built upon the analysis of the existing situations, potential and demand for walking and experimental and temporary schemes.

7.5 **Local Centres + Walking Analysis**

7.6 To better understand demand for walking in Haringey, existing town centres and destination clusters have been mapped to highlight the key areas within the Borough where higher levels of walking activity would be anticipated. The plan identifies the seven key centres of: Bruce Grove, Crouch End, Muswell Hill, Harringay Green Lanes, Tottenham Green, West Green Road/Seven Sisters, and Wood Green. These areas are also identified as Primary Shopping Areas in Haringey's Local Plan.





7.7 In addition to the district centres, clustering analysis was undertaken to identify areas which had higher concentrations of potential walking destinations. Destinations included retail centres, schools, major employment sites, recreational and leisure facilities and transport interchanges.

7.8 All potential destinations with Haringey were plotted, and then an analysis was undertaken to identify the areas with the highest concentrations of destinations. The Borough's district centres are focussed on the more commercial areas in Haringey. The clusters analysis provides a complementary set of analysis that identifies potentially less obvious clusters of walking destinations but cumulatively could become additional walking zones.

7.9 Recommended Walking Corridors

7.10 The key areas for focus in developing the Borough's future walking network are:

- Seven Sisters + St. Anns
- High Road (A1010)
- Wood Green + Turnpike Lane
- Seven Sisters
- Crouch End + Hornsey
- Muswell Hill

7.11 Future Walking Clusters and Walking Corridors

7.12 The plan presents the proposed future walking clusters and a series of walking corridors within each cluster. The clusters are intended to provide an area of focus where there is a combination of local centres, concentration of key walking destinations, and significant walking potential.

7.13 The walking corridors have been identified to provide indicative alignments to focus future improvements in those areas and to ensure convenient, safe and intuitive walking routes in the key clusters.

7.14 The WCAP prioritises improvements to walking routes linked to green spaces, places to sit and relax and key destinations in the borough.



Recommended Walking Clusters + Corridors

Recommended Walking Clusters Recommended Walking Clusters

7.15 The council will deliver these cluster and corridors using the levers and initiatives, such as LTNs. We will also look to the development industry to ensure future development provides the necessary walking links to improve our network and enable more residents to walk safely throughout the borough.

7.16 **Walking for leisure**

7.17 Walking for leisure is important. This includes the ability for people who are less able to enjoy the same routes and places as everybody else. It is something that most people can do, and it is also good for us in a number of ways. We are lucky to have lots of places that are great to go for a walk, especially the borough's green spaces and those in neighbouring boroughs.

7.18 As can be seen in the plan above, our green spaces are located adjacent to many of the walking cluster areas in the borough. This means that they are very close to the areas where people walk a lot in Haringey and where more residential development is planned. In addition to being nice places to go for a walk they are also nice places to walk through and importantly provide links between centres, residential areas and other areas of higher footfall.

7.19 Through the new Local Plan preparation, we are working with TfL and other partners to develop a green grid in the borough to link our town centres and residential areas to our green spaces and those bordering our borough. The green grid will be further enhanced through the implementation of new leisure walking and cycling links through the lifecycle of this action plan.

8. Cycling in Haringey in the future

8.1 TfL's 2017 Strategic Cycling Analysis for Haringey suggests that the borough has only fulfilled a small part of its potentially cyclable trips, showing potential increases of 80% with 10-20,000 switchable trips a day. This is undoubtedly partially due to the large gaps in cycle infrastructure for all types of cyclist that exists in some parts of the borough suppressing levels of cycling.

8.2 We know from our analysis of the existing network that these gaps break up our borough into fragments and stop lots of people cycling more whilst preventing others altogether.

8.3 In addition to our analysis the information provided through the development of Haringey's Transport Strategy and more recently through our on-line Covid-19 response engagement have been combined with the analysis of the existing network to help us build a robust plan for cycling in the borough.

8.4 The new plan combines the priorities developed through interrogating this information, combined with conversations with stakeholders and partners including neighbouring boroughs and our emerging network of temporary cycle lanes.

8.5 Strategic cycle network

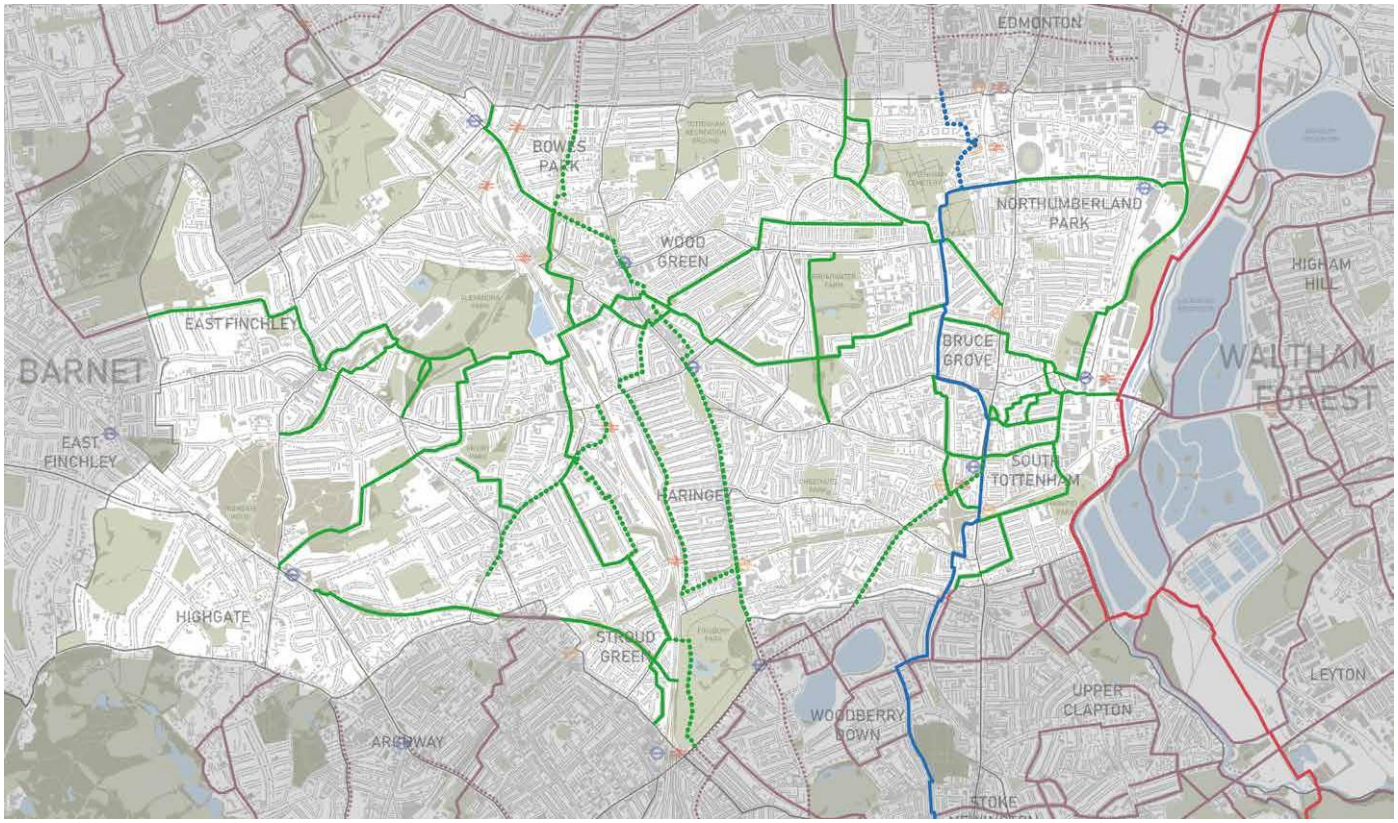
8.6 The key elements of our plan for cycling in Haringey are new cycle routes and the improvement of a number of our existing routes. This network will provide vital joined up high quality cycle routes linking different parts of the borough, with neighbouring boroughs and further afield. These routes will provide crucial alternatives to using public transport for residents trying to get to work or children trying to get to school.

8.7 We hope to refine this network over time, deliver schemes that work and prove popular whilst seeking funding to add more of the key missing links and gateways currently missing. Our network will provide a range of cycle route types from direct/commuter routes on our main roads to quieter routes (Quietways) which take cyclists off main roads and onto quieter residential streets and through parks. These routes can be taken for leisure or by less proficient cyclists.

8.8 Our strategic approach to delivering LTNs set out in this WCAP (section 9) will provide an opportunity for enabling more cycling without the need for route segregation. In some circumstances this can be more impactful on our rates of cycling in the borough. This outcome is therefore an important criterion for assessing future LTNs.

8.9 Confirmed Future Cycle Network with Covid-19 Streetspace Measures

8.10 As discussed in more detail in the Covid-19 appendix to this document we have developed a series of temporary and emergency cycle routes to provide alternatives to public transport and prevent the potential large increase in car use which would lead to congestion and gridlock.



Confirmed Future Cycle Network

- Existing LBH Signed Cycle Routes
- Existing Neighbouring Borough Cycle Routes
- Confirmed Future LBH Cycle Routes
- Neighbouring Borough Cycle Routes
- Cycle Superhighway 1
- National Cycle Network 1 (NCN1)
- Cycle Superhighway 1 - Extension to

8.11 The plan summarises proposed cycle routes in Haringey and the surrounding Boroughs.

8.12 The main cycling elements of the Haringey's proposed future cycling network includes::

- CS1 Extension into LB Enfield
- Upgrade of existing CS1 Route
- A cycle route on Wightman Road and/or Green Lanes
- Delivery of Quietway 10 between Bowes Park and Finsbury Park in Haringey (extending to Farringdon)
- A new cycle route between Tottenham Hale and Finsbury Park (extending to Camden Town) – this route is also referred to as Cycle Future Route 2 (CFR2) and its alignment was consulted on by TfL in 2019
- New east west connections across the borough.

8.13 Information on proposed routes in neighbouring boroughs has been supplied by Borough officers and provides the latest summary of these developments. Connecting with neighbouring boroughs will be a crucial step in the evolution of Haringey's cycle network to provide high quality facilities that connect with local destinations as well as central London.

8.14 Our neighbouring Boroughs already have, or are developing high quality cycle networks in place that reach close to the Haringey border. The key developments from neighbouring Boroughs, which we prioritise connections to, include:

- LB Enfield: Extension of CS1 via Bull Lane to Borough boundary
- LB Waltham Forest: New segregated cycle facilities on Ferry Lane
- LB Islington – Quietway 10 to Finsbury Park
- LB Barnet - A1 (Archway Road) connections

8.15 **Future Cycle Network with Strategic Alignments**

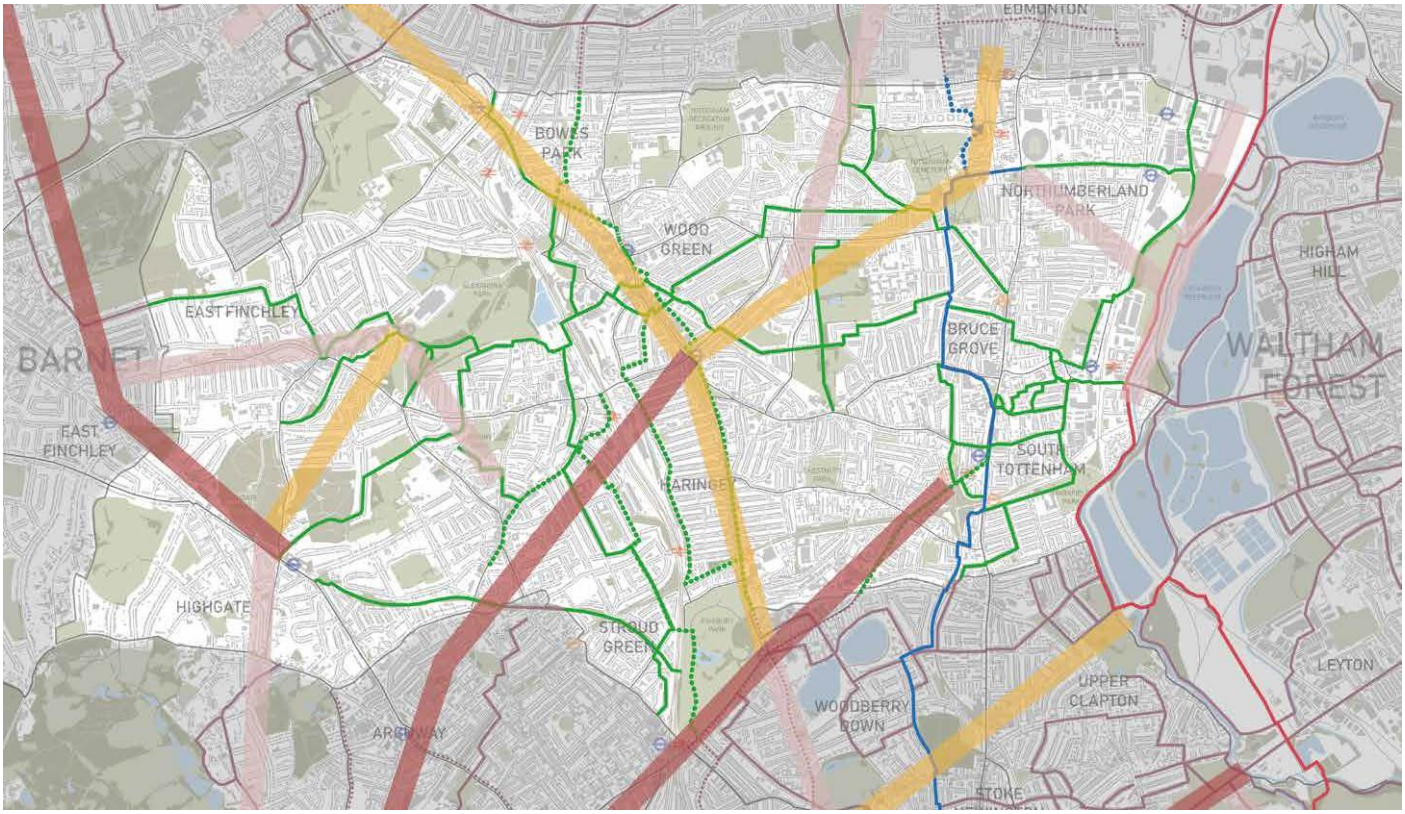
8.16 The Strategic Cycle Analysis (SCA) was developed by TfL to identify key corridors and locations

with potential for significant increases in levels of cycling. The analysis also considers connections with public transport and walking to identify key locations for improved interchange. The SCA forecasts used a combination of population and employment forecasts, TfL Cynemon Model outputs and areas with high potential for switchable trips from vehicles to cycling.

8.17 The key output from the SCA is a future network of straight origin-destination connections across London based on the future trends for cycling. These connections are presented in three categories:

- Top Potential Connection: Connections in the top 10% for both current and future cycle trips
- High Potential Connection: Connections amongst the top 15% for current trips and top 10% for future cycle trips
- Medium Potential Connection: All other connections identified through the SCA analysis

8.18 The plan below summarises the SCA analysis in relation to Haringey. The outputs suggest strong demand and growth for routes from central London into Haringey including two 'top potential connections' into Haringey: Camden Town – Tottenham Hale, and Dalston to Lea Bridge Road via South Tottenham. The analysis also identifies potential local connections with the neighbouring boroughs of Enfield and Waltham Forest.



Confirmed Future Cycle Network wih SCA Alignment

- Existing LBH Signed Cycle Routes
- Existing Neighbouring Borough Cycle Routes
- 'Medium' SCA Potential Connection
- Confirmed Future LBH Cycle Routes
- Neighbouring Borough Cycle Routes
- Cycle Superhighway 1
- 'Top' SCA Potential Connection
- 'High' SCA Potential Connection
- Cycle Superhighway 1 - Extension to

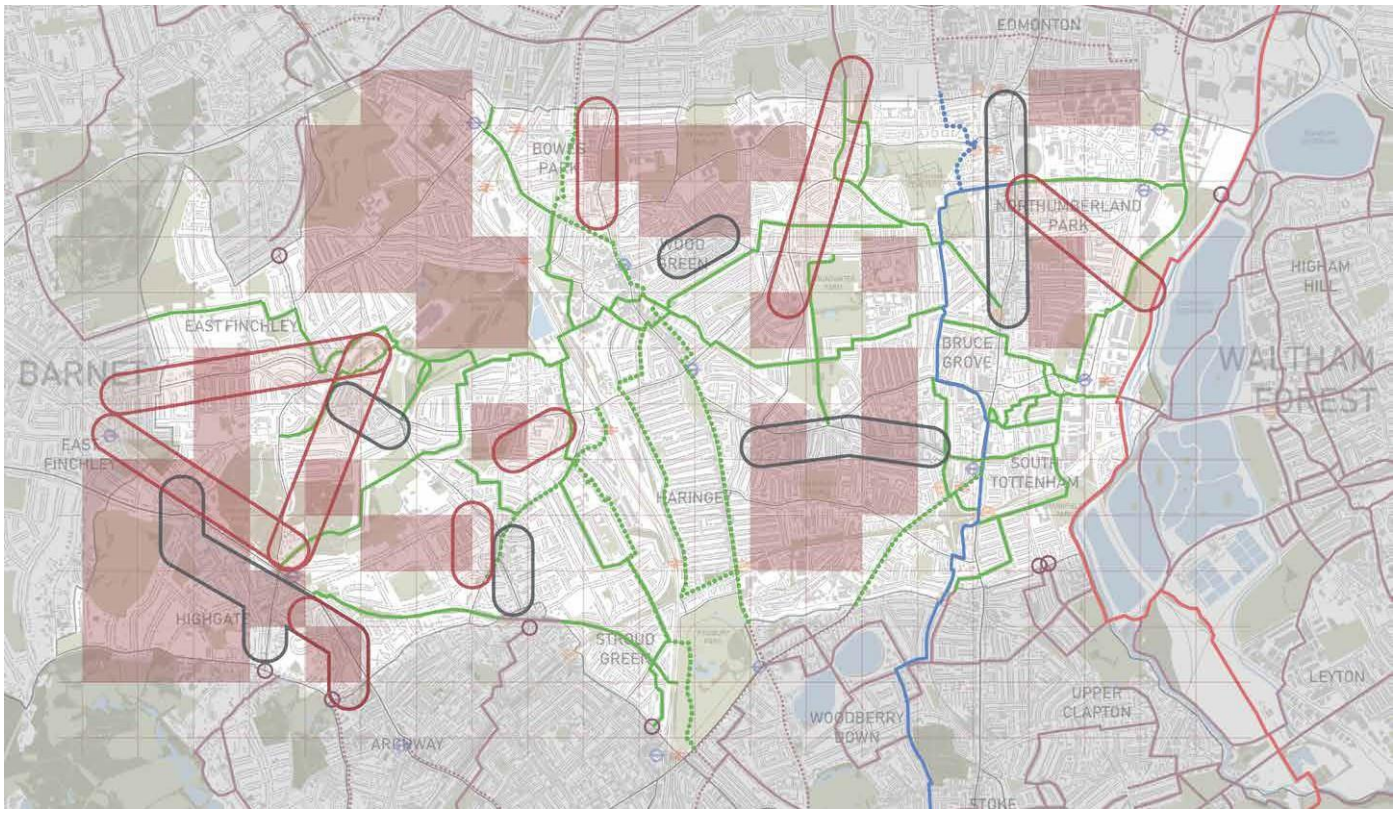
8.19 **Cycling Network Demand**

8.20 This analysis reviews the future cycle networks against the demand analysis to identify areas in the Borough which will require cycling infrastructure in the future to meet anticipated demand. This plan combines the LTDS Cycling Potential Outputs, and Strategic Cycling Analysis (SCA) to identify key areas in the Borough where there is significant captive demand for cycling.

The plan uses a revised Mesh Density analysis to identify 400x400m grids in the Borough where there are no existing or planned cycle facilities.

8.21 Future Cycle Network

8.22 This plan overlays the GAP analysis on the future cycle network to better understand the key areas for developing additional cycle corridors in response to future demand. The combined analyses identifies several areas with a combination of high captive demand and no proposed cycle facilities, including: North Tottenham, St. Ann's, Highgate and Wood Green/ Bowes Park. These areas form the basis of the recommended cycle corridors later in this document.



Confirmed Future Cycle Network wih SCA Alignment

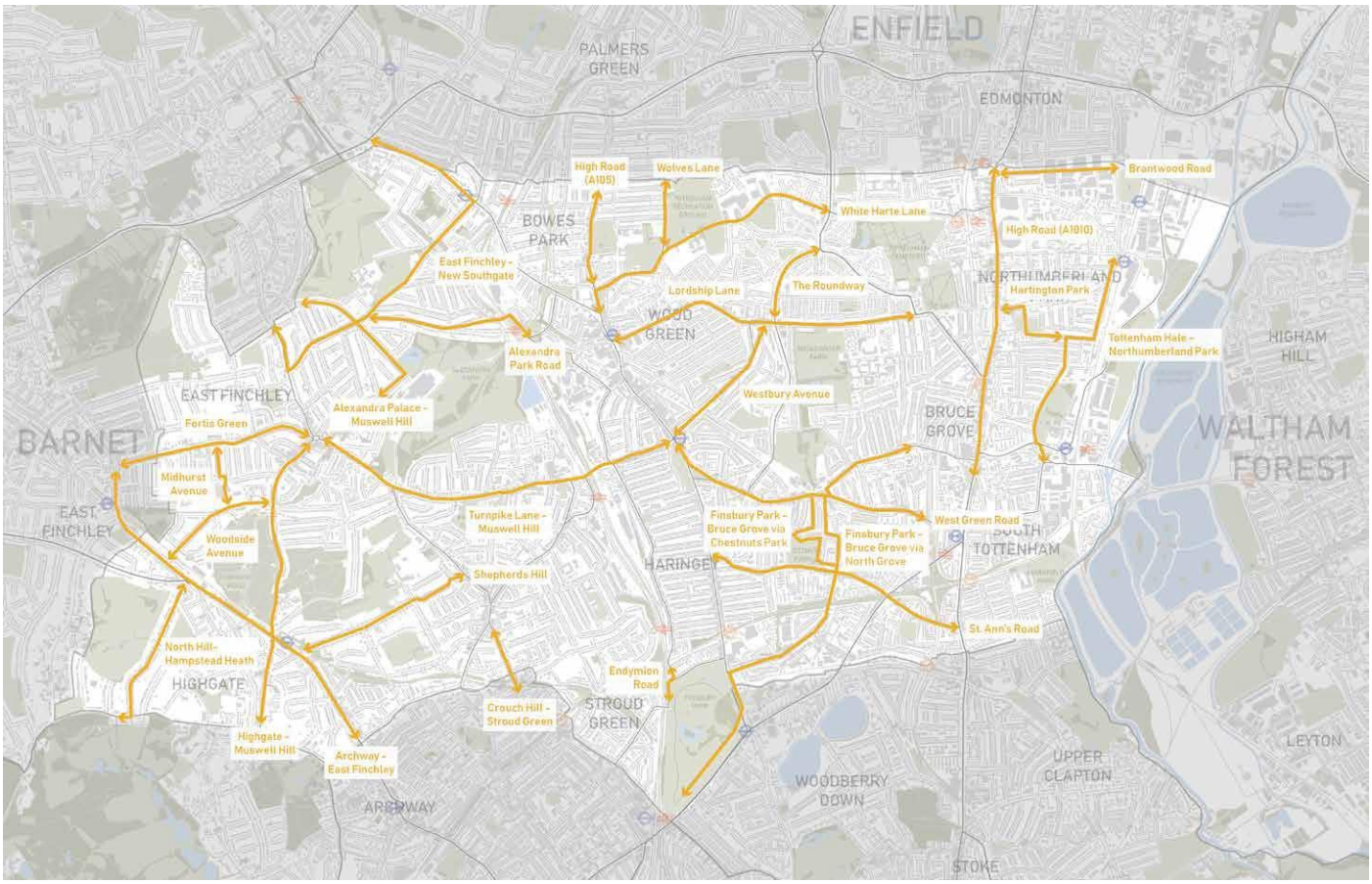
- Existing LBH Signed Cycle Routes
- Existing Neighbouring Borough Cycle Routes
- Poor Air Quality Gaps
- Confirmed Future LBH Cycle Routes
- Neighbouring Borough Cycle Routes
- Cycle Superhighway 1
- Cycle Network Mesh Density Gaps
- Poor Air Quality Gaps
- Cycle Superhighway 1 - Extension to LBE

8.23 Recommended Cycle Corridors

8.24 Based on the findings from the GAP analysis and Future Cycle Network review, a series of corridors have been developed that would help respond to future demand and gaps in the proposed future networks. The plan below has provided indicative alignments for these corridors:

- Brantwood Road
- High Road (A1010)
- Tottenham Hale – Northumberland Park
- Hartington Park
- West Green Road Finsbury Park – Bruce Grove
- Endymion Road
- Westbury Avenue
- The Roundway
- Turnpike Lane
- White Hart Lane
- Wolves Lane
- High Road (A105)
- East-Finchley – New Southgate
- Alexandra Park Road
- Alexandra Park – Muswell Hill
- Turnpike Lane – Muswell Hill

- Shepherds Hill
- Crouch Hill – Stroud Green
- Archway – East Finchley
- Highgate – Muswell Hill
- Fortis Green

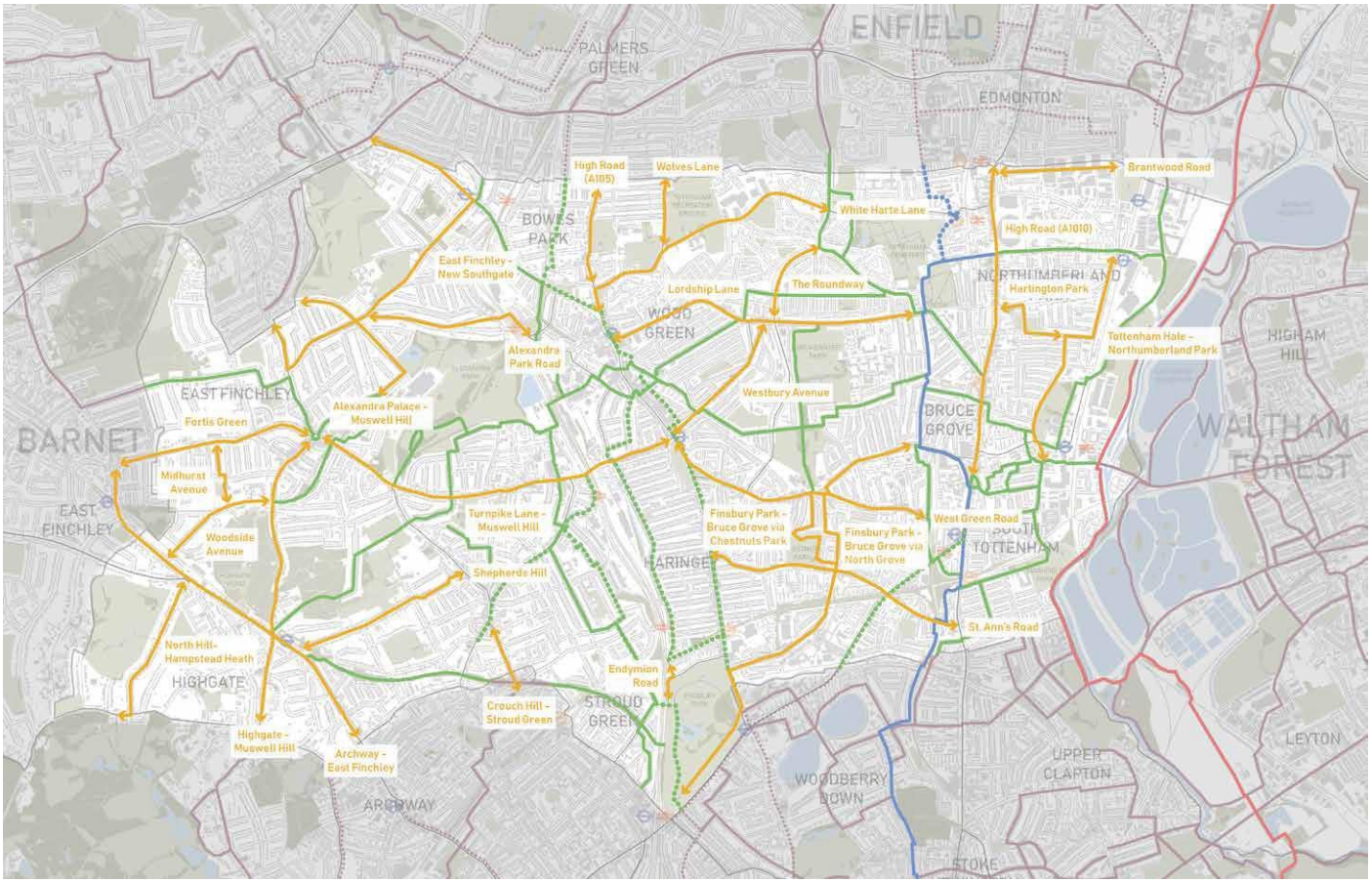


Recommended Cycle Corridors

WCAP Recommended Cycle Corridors (Subject to consultation + detailed design)

8.25 The recommended cycle corridors have been overlaid onto the gap analysis of Haringey's proposed future cycle network to illustrate how these corridors will supplement the Borough's existing and proposed cycle routes. The resulting network would create a comprehensive range of routes that would fulfil future demand for cycling and ensure that everyone in Haringey has easy access to a high-quality cycle route.





Confirmed Future Cycle Network wih Recommended Connections

- Existing LBH Signed Cycle Routes
- Existing Neighbouring Borough Cycle Routes
- Confirmed Future LBH Cycle Routes
- LBE Future Neighbouring Borough Cycle Routes
- Cycle Superhighway 1
- National Cycle Network 1 (NCN1)
- Cycle Superhighway 1 - Extension to
- WCAP Recommended Cycle Corridors

8.26 Refocus on Cycle Superhighway 1 (CS1)

8.27 Cycleway 1 is Haringey's only strategic cycle route and links the heart of Tottenham via the south of the borough, into Hackney and the city of London. It is a combination of two-way cycle track located on wide footways and sections of on road cycling on residential streets. Unfortunately the traffic conditions on these sections are hostile and deter most cyclists from using the route. Despite the conditions on these sections it is still a popular route with residents and people cycling through the borough.

8.28 The need for a higher quality route with greater capacity on the Cycleway alignment is now of strategic importance. Haringey is delivering extensive improvements to the route and will continue to explore further opportunities to do so in order to make a user-friendly, safe and inviting route running through the entire borough connecting to its continuations in Hackney and Enfield. Longer term, the priority CFR2 route will be designed to help improve CS1. Improvements and enhancements to this route are prioritised in the WCAP.

8.29 The current CS1 enhancements being made include:

- Broadwater Road - modal filtering
- Philip Lane – Extend light segregation through zebra crossing, relocate zig-zag markings, and temporary bus stop boarders (possible centreline removal and widen cycle facilities)
- A10 High Road (Seven Sisters) – relocate cycle track and shared-use track away from busy footway areas
- Improvement of CS1 between Ermine Road in South Tottenham and the Hackney Boundary at Holmdale terrace

8.30 In addition to the improvements to the existing Cycleway 1 in the borough there is a potential to extend the route and connect to the London Borough of Enfield and its Cycle Enfield network. This CS1 connection to Enfield is a priority extension. Officers are working with Enfield to deliver this section.

8.31 Cycling for leisure

8.32 A good cycle network provides for all types of cyclists and all sorts of cycle trips and cycling for leisure is just as important as cycling to work or school. We are blessed with lots of green spaces both in the borough and nearby that are all easily cyclable in distance but haven't always been easy to cycle to. Our planned cycle network will unlock these green spaces to people cycling. This will link to local networks such as the green grid which is a network of walking and cycling routes into and out of areas of green space in Haringey and next to the borough.

8.33 Cycle training

8.34 We plan to continue to deliver our successful cycle training programme for people who live, work and study in the borough. At the time of preparing this plan we are unsure the available budgets for cycle training available from TfL. Notwithstanding this, The need for universal access to good quality cycle training remains one of our highest priorities and we will continue to work with partners to improve and expand delivery.

8.35 In the longer term we hope to increase the number of people we train and widen the training offer for the bike to include training for using specialist bikes such as cargo bikes. The number of people we can train and the types of training we can offer is however determined by the amount of funding we receive. For this reason, we are exploring all funding options and opportunities for increasing cycle training in the borough.

8.36 Cycling for everyone

8.37 We will introduce infrastructure that enables anyone who wants to cycle. We will ensure through the correct application of design standards and engaging experts such as Wheels for Wellbeing that our new cycling infrastructure is suitable for everyone including those who use specialist cycles.

8.38 Whilst the infrastructure is important so are cycles to cycle on. Not everyone can afford a cycle for them. For some people it is just because a new bike is too expensive whilst for others it may be the type of cycle they need to suit their needs.

8.39 For this reason, we hope to work with a number of stakeholders to improve this situation. We hope to continue to work with community groups to enable more people to cycle



8.40 We will also continue working with local bike shops and retailers to support the successful second-hand bike markets and the 'try before you buy' cycle scheme in the borough. In the past we have encouraged retailers to attend Council events to promote their initiatives and products.

8.41 Lordship Recreation Ground Cycle Training Track

8.42 We are blessed in the borough with a special piece of cycling infrastructure in Lordship Recreation Ground. The cycle training track is an amazing place for people to learn to cycle.

8.43 Our ambition is to make some additions to it to bring it up to date so children can use it as a part of learning to navigate road space on two feet and wheels safely.

8.44 Cycle parking

8.45 Our plans for cycle parking are built on the aim that people who cycle should have somewhere safe to lock their bike at home, work, school or wherever they are visiting and everywhere in between. We know how important good cycle parking is. Simply put if you can't lock your cycle somewhere safely, you're unlikely to use it. This includes at homes, places you visit, schools, shopping areas and transport interchanges.

8.46 Included in our plan are a number of ways in to improve the quality and level of provision of cycle parking in Haringey and address this key barrier to people cycling. This includes through the provision of secure cycle parking at stations in the borough and through the continued roll out of cycle hangars providing secure cycle parking close to our residents' homes.

8.47 Cycle parking at home

8.48 Whilst we have 93 cycle hangars on street already in the borough, we currently have over 1,000 outstanding requests for bike hangar spaces. Cycle hangars are usually located on street parking spaces which have been reallocated for cycle parking purposes. This is consistent with Policy 5 of this WCAP.

8.49 Locations for new hangars are primarily chosen based on where there is the most demand. Initially locations are identified via requests received from the general public. A dedicated mailbox has also been set-up where residents can submit their requests – **cycle.parking@haringey.gov.uk**. Installation sites are selected using agreed selection criteria, and a scoring system:

- The date a request is received
- The level of demand in an area
- Equitable distribution throughout the wards in Haringey

8.50 Assessments are undertaken by a council engineer and Cyclehoop, which supplies and installs bike hangars. We try to locate hangars as close as possible to the address from where the initial request came from, whilst considering the appropriateness of the location in terms of practicality and safety. It is important to create natural surveillance of the bike hangar to provide confidence that bikes will be safe, which is why we tend to locate them outside a property.

8.51 Spaces in a bike hangar are allocated based on a priority system that considers each individual's personal circumstances.

8.52 Whilst meeting demand is important it is also vital that safe secure cycle parking options for residents are available throughout the borough and not only where we already have demand. We therefore aim that by 2030 there is a residential cycle parking hangar or similar within a 3-5 minute walk of every home.

8.53 In addition to cycle parking in houses we will continue to work to ensure cycle parking is available for those who want it on estates. We will also continue to ensure developers introduce cycle parking in new developments to the levels outlined in the London Plan. We will continue to strive for better cycle parking in developments to suit all types of user.

8.54 Cycle parking at stations

8.55 Transport for London's cycle parking strategy states it plans to have a minimum 20 cycle parking spaces within 50 metres of every underground

and rail station outside zone one, and 30% spare capacity.

8.56 We propose to introduce a network of secure cycle parking hubs at all stations in the borough together with cycle stands to provide a choice of parking facilities. The cycle hubs will be ideal for local people looking to include cycling as part of their daily commute or who worry about bike theft when shopping locally.

8.57 **Cycle parking at destinations**

8.58 As part of the cycle parking action plan we will ensure provision of cycle parking facilities at all sporting, leisure and shopping destinations within the borough. We will work closely with stakeholders to identify the key locations for the provision of Sheffield cycle stands in town centres, near shops and places of interest.

8.59 **Cycle parking for Schools and Colleges**

8.60 We will continue to provide cycle parking at schools and colleges to further promote active travel by children and students.

8.61 **Cycle parking and Covid-19**

8.62 The Covid-19 pandemic has meant the suspension of most traditional funding streams with very limited funding available for cycle parking. There is however a real requirement to provide high quality cycle parking at all the different places we have focused on from where people live, to where they work, and everywhere they stop in between.

8.63 We have therefore made plans as part of this WCAP to continue to provide more and better-quality cycle parking throughout Haringey. In some places the pandemic and changes in travel choices have made the needs for cycle parking in some locations even more acute. We will work with TfL, the DfT and other stakeholders and partners to progress our plans outlined in this document. This includes both the introduction of temporary and low-cost cycle parking solutions where people need them and planning for a better network of cycle parking throughout the borough. We will strive to introduce cycle parking as part of all our WCAP schemes to maximise the benefit for all. A complementary measure designed into the LTN projects will be the roll out of cycle hangars.

9. Low Traffic Neighbourhoods

9.1 Background

9.2 Low Traffic Neighbourhoods (LTNs) are area-based traffic management schemes that aim to remove non-residential motor traffic from residential areas, as well as reduce the number of short trips made by vehicles which could be walked or cycled. LTNs are normally introduced to support walking and cycling but can also bring a wide range of benefits for everyone, including those who cannot walk or cycle, especially those who live, work or study in them.

9.3 LTNs can polarise opinions. LTNs by their nature will cause some temporary disruption to car journeys and may make travelling by motor vehicle less direct. In the short term, there can be a level of resident and driver frustration as drivers learn to navigate the LTNs, but in the medium term, providing they are implemented well and given time to change behaviours, many car journeys
are removed from roads all together as drivers opt for other sustainable transport modes. This is discussed in the 'Case for LTNs' section detail later on in paragraph 9.20.

9.4 LTNs are most effective when applied to an entire urban area or traffic cell (the area between main roads, railway lines or natural boundaries likelarge areas of parkland). This is down to the fact traffic is best managed across an area and doing something on a street by street basis will often just move problems to neighbouring streets.

9.5 A range of features are introduced as part of LTNs. These measures work together to make it more difficult for motor traffic to travel through an area meaning it is only trips originating from local
addresses or delivery and service vehicles that can be made. Features that are normally introduced in LTNs include one-way streets, banned turns and features called modal filters where roads are closed to motor traffic (at one end or in the middle) removing the ability of non-local traffic to drive along a street.

9.6 Access to all addresses by motor vehicle is still possible and deliveries and servicing can still take place. Emergency Services access will still be possible. However, some access arrangements will be altered which means some residents will no longer be able to use existing access routes in the area. Only the ability for motor traffic to travel through residential areas is removed. This removes popular short cuts for car drivers sometimes known as 'rat-runs'. The removal of non-local traffic allows streets to be redesigned and spaces to be repurposed to people and greening. Traffic levels and speeds reduce significantly, meaning people can enjoy the streets they live in, spend time with their neighbours,
help activate new spaces for people with planting and children can play out without the fear of road danger.

9.7 There are additional wider benefits in improved road safety and reduced traffic volumes also provide the perfect conditions for more walking and cycling. This in turn provides benefits to local air quality, public health, increases social inclusion and mobility, and also provides a wide range of other social, environmental and economic benefits.

9.8 TFL's Strategic Neighbourhood Analysis (SNA)

9.9 TfL published its SNA earlier this year which sets

out a series of strategic-level spatial analyses to inform a London wide picture of potential suitability of different areas for LTNs and the challenges/opportunities in each. This analysis has helped inform our approach to LTNs, including our criteria for assessing the suitability for LTNs. The SNA can be found on the TFL Streetspace webpage[24] as appendices 6(a) and 6(b). We have used the SNA, to interpret a Haringey specific approach which is set out below.

9.10 Defining and determining locations for Low Traffic Neighbourhoods

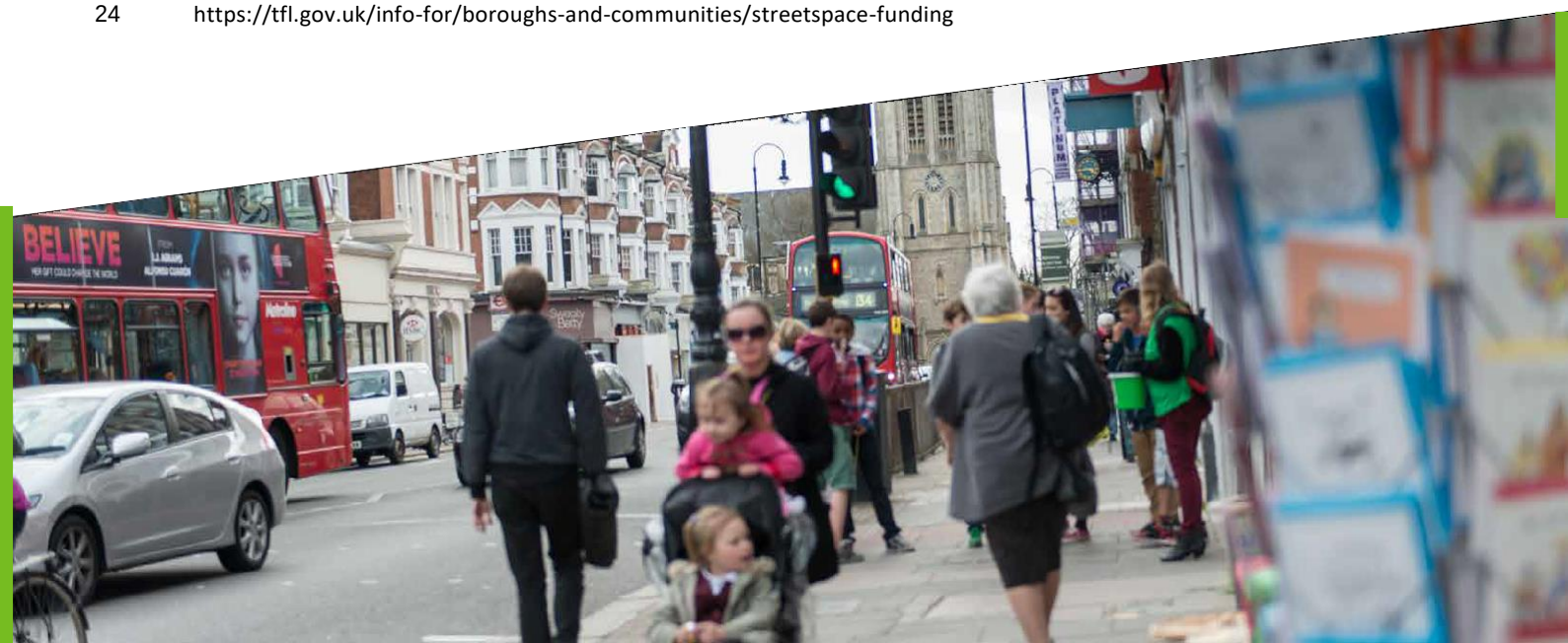
9.11 Decisions about the locations and numbers of LTNs will be made using the criteria-based approach set out below. LTNs can perform several purposes at once, such as addressing residents' concerns with through traffic while providing a safe walking and cycling connection.

9.12 LTNs will be located where the greatest impact at the lowest cost can be achieved, rather than where it will be easiest.

9.13 Haringey's criteria are:

1. **Potential for more walking and cycling** LTNs should help create a coherent and safe street for walking and cycling. LTNs should help connect different parts of the Haringey cycling and walking network together with routes via low-traffic, filtered streets. These routes should be clearly signposted within the LTN and should line up with the crossing points of streets. These can often remove the need for segregated cycleways.
2. **Reduction in traffic volumes and vehicle speeds including mitigating the displacement of traffic onto other local roads** LTNs will need to be designed to mitigate the potential impacts on the wider road network. LTNs should lead to traffic reduction, particularly where LTNs cover a wider area or several are implemented together. This is in part because of the reduction in through traffic, and in part due to making it more convenient for residents to travel by foot or cycle for shorter trips than it is to travel by car, shifting some trips to other modes. To effectively monitor the impacts of the LTN on traffic volumes, assessments will need to be carried out before, and at intervals during the implementation of the LTN. This monitoring will help the council identify how the LTN is operating and if any alterations/ additional measures are needed to mitigate the impacts. The monitoring will include car ownership indicators, observational assessments, perception surveys, traffic counts, bus journey time data from TfL, as well as air quality monitoring.

24 https://tfl.gov.uk/info-for/boroughs-and-communities/streetspace-funding



3. **Road danger reduction**

LTNs should be designed to reduce the number of people killed and seriously injured on Haringey roads (including pedestrians). Increasing the potential for more walking and cycling and reducing the volumes of traffic will reduce conflicts on our roads. LTNs will be required to calm speeds of any local or servicing traffic remaining in the cells.

4. **Enabling space to meet**

LTNs should enable residents, businesses, and visitors to move around, and meet within, the neighbourhoods, including at a safe social distance during the Covid-19 pandemic.

5. **Cycle connectivity**

LTNs need to create cycle friendly networks from people's front door, fit for everyone to cycle from children to older adults. These networks should connect to identified cycle routes, either quiet routes or strategic routes along main roads.

6. **Safe access to schools and local businesses**

LTNs should substantially reduce traffic levels outside schools. This will create safer and cleaner access for parents, pupils and teachers and will enable more school journeys to be made by bicycle or on foot.
LTNs should support the local economy by increasing footfall in Haringey's town centres. They should also complement the council's aspirations for re-allocating road space to enable sustainable growth and to make walking and cycling safer.

To support local businesses LTNs need to plan for the access for freight and servicing when developing measures particularly how they relate to the main roads around them.

7. **Demographics/deprivation**

LTNs need to consider the positive impact they can have on issues of social justice and social isolation. Understanding and overcoming the effect demographics and deprivation can have on people's choices of transport will be a key consideration. Interventions need to be tailored to ensure everyone benefits from safer and cleaner streets.

8. **Accessible for wheelchairs, mobility scooters and walkers**

LTNs should create neighbourhoods which are accessible for wheelchairs, mobility scooters and walkers. Quieter and safer roads will mean those who would normally travel by car are more likely to feel able to travel actively. This leaves more space for families with young children and the mobility impaired to make journeys without fear of high traffic volumes or speeds.

9. **Deliverability, cost, and general suitability/ other characteristics**

LTNs need to be funded and be value for money. The infrastructure costs should be kept low. Using temporary materials might be a solution when funding is constrained. Restricting motorised vehicle access with temporary materials not only has the advantage of being lower cost, it also affords the opportunity for alterations to be made relatively quickly and easily and to take on board community feedback.

LTNs need to ensure they are deliverable by making sure everyone understands the scheme and supports it, particularly local representatives and the community. Every LTN will have different and distinct characteristics unique to their areas.

There will not be a 'one size fit all' approach. Each LTN will need to consider local context, geography, demographics, and community aspirations.

LTNs will need to ensure concerns over personal safety are overcome by involving the emergency services and designing in measures to:

- ensure quieter areas do not result in increased crime and disorder; and
- that natural surveillance and street lighting exists to improve actual and perceived personal safety.

10. **Community engagement with residents and other groups**

Engagement on LTN proposals is crucial to successful implementation. Residential streets often generate a sense of ownership and belonging for those who live on them and can have a major influence on their quality of life. Haringey has an active Living Streets network and other group networks such as the Haringey Cycling Campaign and residents associations which should be harnessed. Communicating the schemes simply, clearly and engagingly will be essential to achieve community trust and buy in. Co-design approaches where councils work with the community to design schemes can often produce the best results.

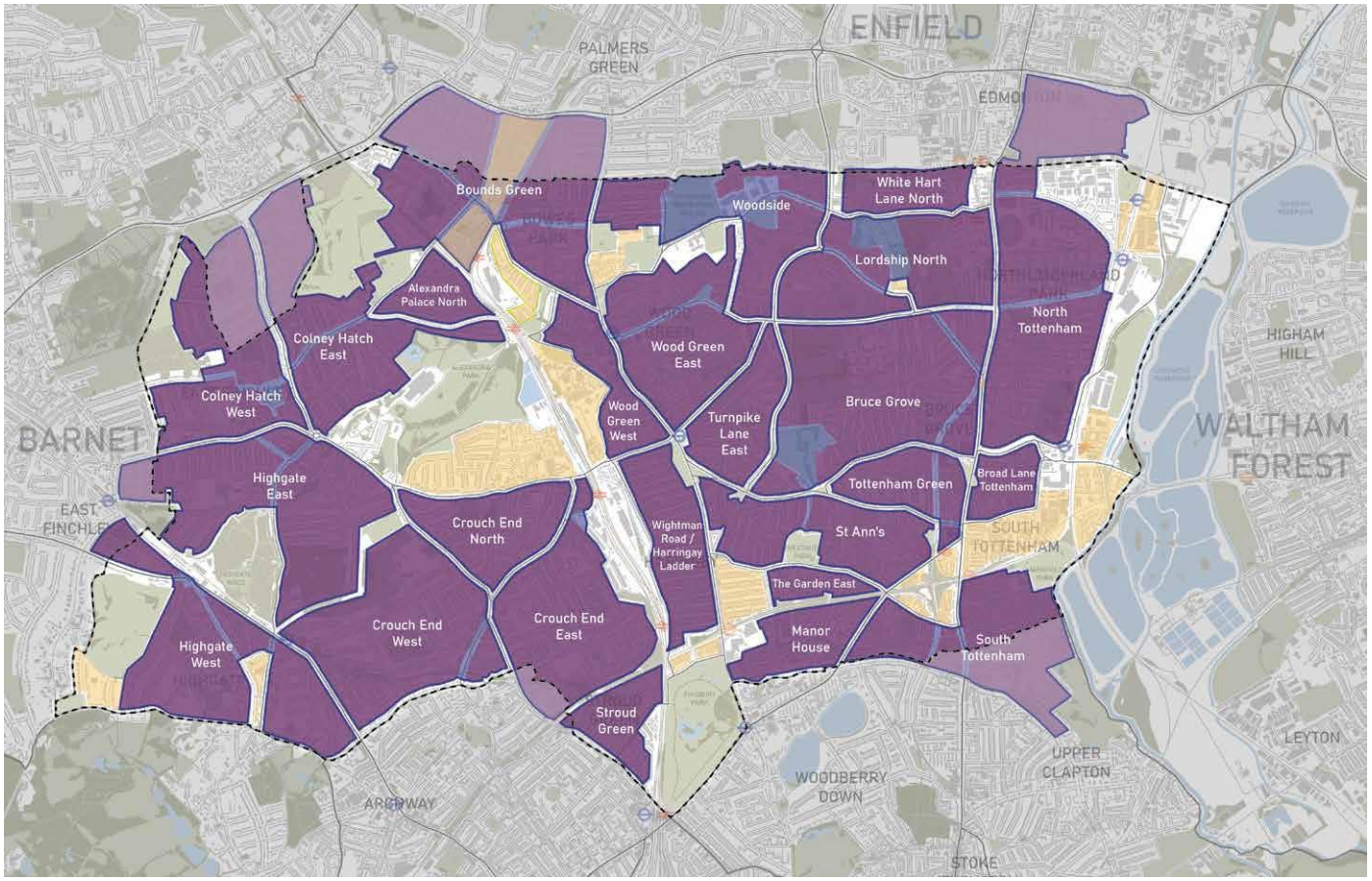


9.14 **Identifying LTNs in Haringey**

9.15 The starting point for identifying locations is to analyse where the key lines of severance are across the borough. The ability of main roads to accommodate and absorb larger volumes of traffic provides an underlying justification for filtering traffic away from residential streets. Severance can also be achieved by railways, rivers, and non-residential land such as parks and industrial land. The areas in between the lines are referred to as 'residential cells'. The cells form the areas of the LTNs. An LTN can be one cell or a collection of cells depending on the scale, type and objectives of the intervention.



9.16 The Map below, which is indicative rather than a precise blueprint, shows our analysis of severance and will form part of the criteria for considering LTNs across the borough. We have identified 82 cells in total in the borough. Of these 82 cells 23 are already self-enclosed and require little change with regard deterring or removing through traffic. The remaining 59 traffic cells in the borough are porous to non-local motor traffic and have been separated into 22 LTNs which form the strategic basis for assessing LTNs. These 22 LTNs are listed in the delivery plan. All LTNs the Council brings forward will be subject to extensive engagement and consultation



Low Traffic Neighbourhoods - LBH Cell Clusters

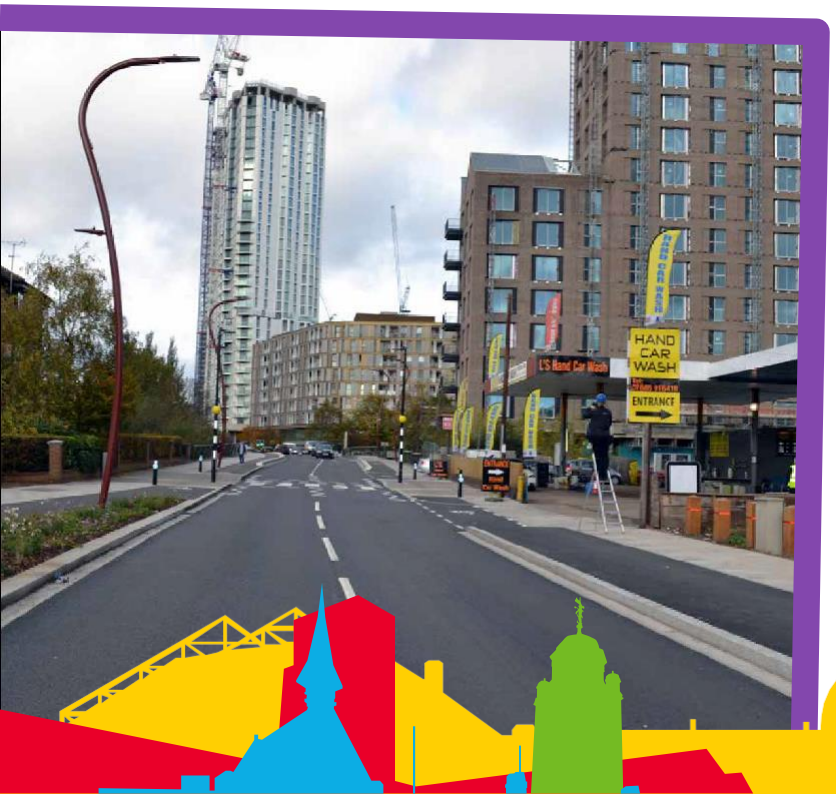
- Indicative LTN Cell Boundaries
- Existing cells with no through-access for vehicles
- LBHaringeyBoroughBoundary
- LBH cell clusters

9.17 Designing Low Traffic Neighbourhoods

9.18 LTNs generally do not require significant civil engineering. There are a variety of different types of intervention available, which may be appropriate depending on the specific local challenges.

These include:

- Modal filters: bollards, planters or banned turns, cycle contra-flows, bus gates, cameras/ enforcement
- Measures to enhance public realm and urban greening e.g. planters, pocket parks at modal filter locations in either a temporary or semi-permanent form, and if there is scope for more permanent features, sustainable drainage systems (SuDS)



- Cycle parking, preferably on the carriageway rather than the footway. This may serve as destination parking e.g. Sheffield stands at shops or for short stay on residential streets, or for home-use by residents e.g. cycle hangars
- The inclusion of school streets
- It may be appropriate in locations with local cafes and restaurants to use modal filters and road closures to make space available on- street for tables and chairs.

9.19 We will consider using a range of tools to implement LTNs, including the use of experimental traffic orders, trials and temporary materials to introduce measures quickly. Using trials will allows the council to adjust interventions and determine what changes would be needed to make a layout permanent should it prove successful.

9.20 **The Case for Low Traffic Neighbourhoods**

9.21 Over past decades, there has been a significant increase in traffic volumes on residential streets, resulting in greater noise, air pollution and road danger. This has been made worse by the introduction of sat nav apps which lead increasingly more traffic through residential areas. At the same time, car ownership across London has been falling. Less than half of the population in Haringey owns a car. This means the majority of traffic on our residential roads is from vehicles which have not originated or are not destined for the borough. Maintaining this trajectory is therefore not an option. Increasing through-traffic and an increase in short journeys made by cars which could be travelled by foot or bike, need to be tackled. Creating LTNs will not only achieve this but also improve the environment for residents to walk, cycle and reclaim streets for play and community interaction.

9.22 During the height of the Covid-19 lockdown, London witnessed how creating more space to walk and cycle can reduce traffic and improve air quality. Traffic on streets reduced dramatically and in turn, London's toxic air pollution improved in some areas. Less traffic on our streets created safer, quieter streets and improved the experience for walking and cycling, including increasing the time people spend in their local shopping areas.

9.23 Whilst a relatively new term, modal filtering has been a commonly used traffic management tool since the 1970s, as car ownership and use expanded. Haringey does not currently have any LTN areas although there are some examples of interventions which have resulted in similar outcomes. One example is the filtering of streets known as 'The Gardens Neighbourhood' in N4.

9.24 As mentioned earlier LTNs can divide opinions. LTNs designed and implemented properly, and overtime, have the best chances of success. Piecemeal and isolated LTNs can cause spillover congestion in the short term, which is a common cause for concerns to LTNs. However, whilst it can take time for traffic patterns to change as a result of the LTN, vehicle evaporation does occur. Measures will be needed to alleviate traffic flows on main roads as a consequence of the LTNs.

9.25 Traffic monitoring from 6 LTNs in London has shown concerns of traffic and pollution increases failed to materialise. The results of the Railton LTN in Lambeth can be found here: https://beta.lambeth.gov.uk/streets-roads-transport/low-traffic-neighbourhoods-0/railton-low-traffic-neighbourhood

9.26 **Vehicle Evaporation**

9.27 Predictions of traffic problems caused by LTNs almost always fail to materialise and that significant reductions in overall traffic levels across an area can happen as a result of people making different choices about their mode of choice and the journeys they make.

9.28 Experience from LTN interventions in London have shown, in the short term, some neighbourhoods experienced increases in congestion and worsening of traffic. This can occur in the period immediately after implementation as traffic patterns and journeys adjust. Evidence from the Walthamstow Village scheme[25] in Waltham Forest shows that the displacement of traffic soon evaporates entirely as drivers adjust routes and behaviours to avoid

these areas, changing modes of transport or even cancelling journeys.

9.29 LTNs are not a quick fix but provide a medium to long term solution to improve our residential areas, improving air quality and enabling more walking and cycling. Traffic evaporation is well-evidenced across a number of schemes. The most comprehensive study of vehicle evaporation was carried out by Sally Cairns, Carmen Hass-Klau, and Phil Goodwin in 1998 and followed up in 200226This brought together experience from 70 case studies of roadspace reallocation from general traffic, across 11 countries, with opinions from 200 transport professionals. It showed that people make all sorts of different decisions when driving conditions change including finding alternative routes, alternative modes and different frequencies of journeys.

9.30 According to a review of the study by London Living Streets[27], in half of the case studies, there was an 11% reduction in number of vehicles across the whole area where roadspace for traffic was reduced, including the main roads. This research showed that LTNs do not simply shift traffic from one place to another, but lead to an overall reduction in the numbers of motor vehicles on roads.

9.31 Low Traffic Neighbourhoods in Haringey

9.32 Responding to Covid-19 has increased the community appetite for LTNs in Haringey and TfL has also prioritised funding for LTNs across London as part of the London Streetspace Plan.This has enabled the council to focus resources to identifying the areas of the borough where LTNs were needed. In December 2020 the council approved three LTNs for implementation on a trial basis, following 12 months of comprehensive engagement and consultation with the community. These LTNs, to be delivered in Summer 2022, are:

- St Ann's
- Bruce Grove West Green
- Bounds Green

9.33 We will develop additional LTN proposals using the criteria approach set out above as funding opportunities are identified. We are committed to working closely with key stakeholders including emergency services . The less traffic there is on London's streets, the quicker and easier it is for police, ambulance and fire services to get to their destination.

9.34 LTNs and Equalities

9.35 LTNs are not an attack on car and the council recognise that some essential car journeys will need to be made through the LTN restricted access points. This is particularly the case for disabled residents, those who receive care and those with special educational needs who need to get to school and other activities. The Council is developing an LTN Exemptions' Policy to ensure LTNs advance equality as far as possible.

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25 https://enjoywalthamforest.co.uk/work-in-your-area/walthamstow-village/comparison-of-vehicle-numbers-before-and-after-the-scheme

26 www.rachelaldred.org/writing/thoughts/disappearing-traffic/

27 https://londonlivingstreets.com/2019/07/11/evaporating-traffic-impact-of-low-traffic-neighbourhoods-on-main-roads/

10. Future: The active school run

10.1 We know that the school run is a major contributor to congestion in the morning. Children being driven to school also means they are missing out on the opportunity to be active before and after school. Being active before school through walking or cycling there, like being active during school, is shown to help children with concentration through the school day

10.2 Children being driven to school contributes to issues with their health, like obesity and adding to air pollution generated at busy times by motor traffic. We want to work with our schools, parents and children to make the school run more active. We know we also have to provide the right infrastructure so parents and children want to walk, cycle and scoot to school. We will continue to deliver active travel initiatives such as Stars in Schools with our partners including TfL.

10.3 School Streets

10.4 We plan to introduce 'School Streets' at primary schools throughout the borough. 'School Streets' are time traffic management schemes that partially or fully close streets outside schools.

10.5 We plan to introduce improvements in streets around every primary school in the borough by 2031. The Council has adopted a separate but complementary school streets action plan.

10.6 Walking and cycling to school

10.7 We plan to link schools to places people live in the borough through our walking and cycling networks. In areas where there are clusters of schools such as the St Ann's area we will focus on developing proposals for the wider area that prioritise children walking and cycling to school.

10.8 Our planned temporary strategic cycling network will serve existing and planned schools in the borough with many other schools and places of education located on or near other routes included in our planned network. Additionally, we are working to provide more space for children and parents walking, cycling and scooting to school both in the short term through emergency measures and our longer-term programme of school streets.

10.9 We will work with partners including TfL to provide cycle maintenance sessions, cycle parking and other supporting measures near to schools. This will include introducing cycle parking outside schools in place of car parking and converting road space to space for active travel.

11. Future: Active travel and development

11.1 Development in the borough is managed through the planning process using policies in the London Plan and Haringey's Local Plan. Planning and developments have the potential to support more walking and cycling in Haringey. We will work with developers to ensure that people walking and cycling are prioritised throughout the entire lifecycle of development and ensure Haringey's Site Allocations deliver the objectives of this WCAP.

11.2 This will mean from the outset people walking, cycling and spending time will be central to the design of new streets. Our cycle parking requirements included in planning policy provide more for people cycling and different types of cycle.

11.3 Developers will be required to ensure their designs deliver the aspirations set out in this WCAP. Walking and cycling should be considered as an integral part of schemes which they bring forward. Schemes should also recognise the contribution and support public transport plays in supporting active travel. During construction we will work with developers to minimise the disruption to people walking and cycling. There will be a specific focus on maintaining key walking and cycling routes particularly walking routes to town centres and transport interchanges, and cycling routes included in the cycle network. Clear guidelines will be set out in Construction Management Plans for developers when operating temporary traffic management to ensure the continuity of safe active travel modes.

11.4 We will ensure that developments do not create car use and do support active travel and the use of public transport. We will ensure developments enable their residents to embrace active travel from the outset. This includes through the delivery of travel plans for developments and new schools in the borough. New housing provides the opportunity for new pieces of infrastructure to be introduced and often provide once in a lifetime opportunities to rethink and make real change to the way streets work in parts of the borough.

11.5 New developments and particularly high-density housing can bring with them lots more people wanting to use existing streets and public transport networks. Walking and cycling if planned and provided for, can be the natural choices for people living in new developments, particularly those with good public transport links.

11.6 We will use all the tools at our disposal including the adoption and delivery of our Site Allocations in the Local Plan, pre application discussions, the planning application process and securing S106 contribution to ensure the development industry help deliver this WCAP.

11.7 Regeneration of the Tottenham area has provided an opportunity for new walking and cycling links to be introduced. New residents of developments in the borough are provided with welcome packs that include active travel incentives and information. We will look to expand this offer to existing borough residents, particularly those who live near major development sites.

11.8 Local Centres + Key Future Developments

11.9 Understanding the developmental context and

potential is crucial to developing Haringey's future walking and cycling network. Significant growth and change is expected in the Borough with large areas sitting within the boundaries of various strategic priorities.

11.10 The cumulative potential of the developments in Haringey will significantly change the distribution of the borough's population and how people move around Haringey.

11.11 Tottenham

11.12 The Tottenham AAP has been prepared in order to ensure that the scale of development and change proposed for Tottenham through 2026 and beyond is positively managed and guided by a planning framework. The AAP includes land within the area identified as capable of delivering 10,000 new homes and 5,000 new jobs. It provides a 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.

11.13 The Tottenham AAP seeks to provide the following:

- New north - south walking and cycling links between Ferry Lane and Watermead Way and on towards Meridian Water with potential to tie-in to Enfield's Network.
- Enhanced east-west walking and cycling connections towards Tottenham
- Green Grid walking and cycling accessibility into the Lee Valley, Tottenham Marshes and Walthamstow Wetlands

11.14 Improvements included in the development masterplan for Tottenham Hale will enhance connectivity to the station, retail and residential destinations and unlock the cycle network in the east of the borough providing a missing link towards the Lea Valley, Walthamstow Wetlands and the Enjoy Waltham Forest network.

11.15 Future High Streets Fund for Tottenham High Road

11.16 Through a comprehensive consultation and engagement programme, Haringey Council and residents and businesses in Tottenham developed a 10-year Strategy for Tottenham High Road (2019-2029). The Strategy for Tottenham High Road includes the below key objectives:

- Greening the High Road to tackle pollution
- Brightening up the High Road, making public space more usable
- Introducing play space
- More safe/secure bike parking and areas to cycle
- Improve the experience for both pedestrians and cyclists

11.17 Wood Green

11.18 The vision for Wood Green is that it will become North London's most prosperous and green town centre. The draft Area Action Plan (AAP) sets out policies, proposals and site allocations for future development within the Wood Green area. It covers an area from Bounds Green Road in the north to Turnpike Lane in the south and from Alexandra Park in the west to High Road in the east. It includes plans to increase the number of residential dwellings in the area by 1,700, but also significantly increase the amount of employment space (56,000 sq. m), town centre retail (13,500 sq. m) and other uses (55,000 sq. m).

11.19 The AAP's 'Transport Modelling and Analysis' identifies recommended corridors and design measures in response to TfL's Cynemon Forecast modelling and the anticipated increase in jobs and residents generated by the AAP. TfL's Cynemon model uses a combination of existing and future cycle flows, and existing and proposed cycle infrastructure to forecast changes in cycle flows up until 2041.

11.20 The Cynemon outputs forecasted the highest increases in cycle flows on the Tottenham High Road (A10), Green Lanes (A105), and Seven Sisters Road (A503). Based on these findings, the report recommended the following improvements to the cycle network:

- Extension of Cycle Superhighway 1 to Wood Green
- Segregated cycle route on Lordship Lane to Church Lane, Tottenham (also identified in WCAP)

11.21 In addition to the above routes, the AAP has recommended improvements to walking and cycle facilities on the following alignments through Wood Green:

- High Road – A105 (Turnpike Lane LUL Station – Borough Boundary)
- White Hart Lane (High Road A105 – Great Cambridge Road A10)
- Bounds Green Road (High Road A105 – New River Path)
- Station Road (Park Road – High Road A105)
- Hornsey Park Road (between The Mall – Turnpike Lane)
- New River Path + Mayes Road (Martins Walk – Station Road)
- Coburg Road (Mayes Road – Railway Underpass)

11.22 The AAP includes the creation of new local links for walking and cycling in the town centre area including new walking and cycling links from Alexandra Palace Station, Wood Green Common, the Cultural Quarter, the Clarendon gasworks site, and Clarendon Road into Wightman Road. Also included within the development proposals are cycle parking for new dwellings and for a cycle hub near to Wood Green underground station. Included within the plan is a local cycle network that links into the wider borough network.

11.23 There will be opportunities to develop the network further with and link to existing and proposed cycle routes in the Wood Green area. Improvements for people walking will be also progressed throughout the area as part of the AAP including addressing pinch points and severance from busier roads.

11.24 Applying principles that are included in our Transport Strategy, the Mayor's Transport Strategy (MTS) and associated design guidance from TfL would be a good measure of the provision in terms of walking and cycling from the AAP. For example, in the MTS there is an aim for 80% of residents to be within 800m of a high-quality cycle route by 2041 and a 400m mesh density as per best practice guidance for walking and cycling. The proposals included above, and the local network proposed would provide that.

11.25 The AAP includes plans suitable for anticipated levels of 7% mode share for cycling. Providing high quality cycling infrastructure on the alignments included either in the form of low or traffic free routes or protected space for cycling on the strategic roads included will provide the required infrastructure capable of providing capacity for those trips generated by the development. It will also future proof the development and the town centre providing capacity for additional demand from switched trips, in line with the aspiration of this WCAP. More details of the proposals can be found in the cycling action plan table in the rear of this document.

11.26 Cycle Hire

11.27 A shared cycle hire scheme in Haringey remains a priority for the council. The council is exploring opportunities to launch a trial in 2022. A trial will inform any decision on a future permanent scheme.

11.28 London is continuing to see an increase in cycling usage as more money is being spent on cycling facilities and more people are considering taking up cycling as a form of transport. A cycle hire scheme in Haringey could add further momentum to this trend and increase the accessibility of cycling to certain groups.

11.29 The introduction of cycle hire schemes in other parts of London has helped to increase cycle modal share and ultimately encouraged more people to cycle on private bicycles.

11.30 Cycle hire can be provided in a number of ways ranging from a fully docked system such as the Santander scheme operated by TfL or undocked schemes using geofencing

operating in a number of boroughs in London. The recent improvement in technology in this industry has resulted in a wider choice of systems and bicycles that can be offered through bicycle hire schemes. The introduction of electric assist bicycles in particular, which can be either docked or undocked, provides even greater accessibility and the opportunities in this regard will be explored over the lifecycle of this plan. This is particularly important in a borough such as Haringey where topography and specifically the borough's hills can be a barrier to some people cycling.

11.31 One of the barriers to providing a successful bicycle hire scheme is ensuring that cycles are available where they are needed to meet peaks in demand. The competing demands on public realm is one of the main issues facing successful implementation as space is at a premium around key trip generators / attractors

11.32 **Key benefits of cycle hire**

- Provision of a new individual transport mode (accessibility, connectivity with other modes, resilience to the public transport network, options for users)
- Increase in the levels of cycling through reduced barriers to cycling such as access to a bike, maintenance and theft
- Help to create a more walking and cycling focused borough with less motorised traffic
- Health benefits associated with increased levels of cycling
- Journey time and journey time reliability benefits associated with cycling when compared to other modes in London
- Reduction in overcrowding on buses and the underground in central London
- Promote leisure activities and tourism

11.33 Whilst cycle hire schemes bring numerous benefits, one of the major criticisms of the recent dockless systems introduced in cities including London, is that people leave bikes on footways when they have finished using them. They are often left in locations that are inconvenient to most, problematic to some and dangerous to others, especially those with mobility issues, visual impairments or using prams or wheelchairs. A key feature of any future cycle hire scheme in Haringey will therefore be the use of specific bays or docking stations where users should leave bikes once finished using them.

	How does it work?	Strengths	Weakness
Docked Scheme	Fixed 'posts' or docking stations to which the bicycle is attached	Easy to find a cycle Docking station terminal provide additional functionality Can accommodate different types of cycle; traditional and electric assist Cycles charge whilst docked Temporary docking stations can be installed for events and during the summer months Easy to add docking stations to the scheme	More expensive to set up and maintain than an undocked scheme

Hire Stations	Hire stations equipped with cables (attached to a wall or existing cycle standards), which area attached to bicycles when docked. Bicycles are taken out and returned by use of telephone and pin code	Able to accommodate up to ten bicycles in aa single car parking space (compared to four with the fixed system)	Bicycles are prone to falling over and being regarded as untidy on the streetscape Cycles are more vulnerable to damage
Undocked	Bicycles are self-locking; a metal pole is locked through the spokes. Bicycle is then left in a specified geofenced area and accessed by telephone and pin code	Extremely flexible and convenient for the user once they have located and accessed bicycles	Difficult to find bicycles and the system relies on trust in terms of returning bicycles and communicating to the cycle the location of a returned bicycle

11.34 Staff Pool bikes and cargo bikes

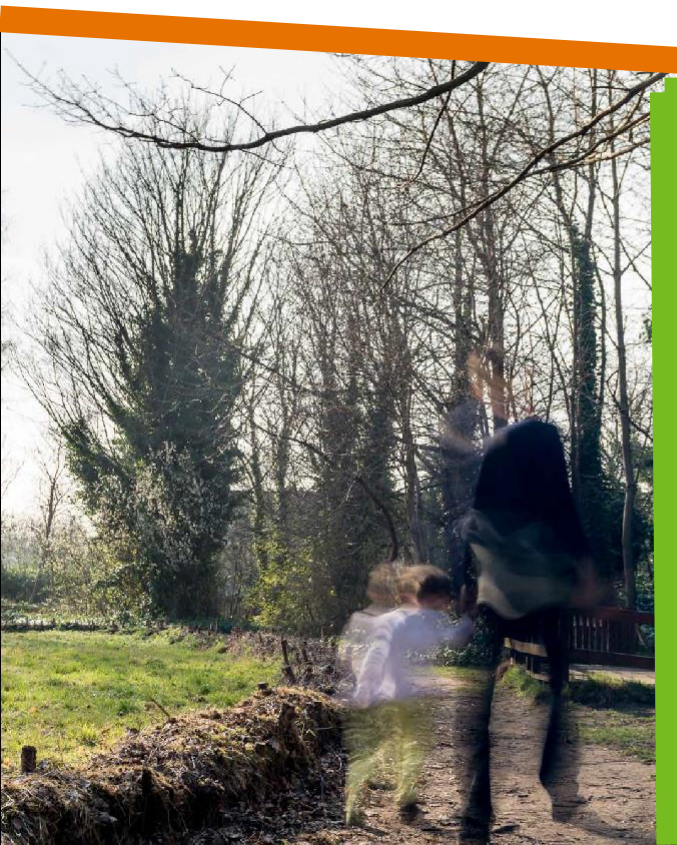
11.35 The Council have a pool bike scheme for staff which focuses on providing bicycles to staff for work related trips as well as leisure trips when the bikes are available.

11.36 In addition to the pool bikes, the council has introduced cargo bikes on its fleet which are available for staff use.

11.37 Dockless Bike Scheme and E-scooters Hire

11.38 The Council's Transport Strategy supports dockless bikes hire as a means for reducing the use of the private car and increasing access to bikes. The Council have been engaged with TfL, London Councils, neighbouring boroughs and operators to explore how these could operate in London.

11.39 E-scooter hire are being trialled in some parts of London. Haringey is not taking part in these trials but we are involved in the pan-London planning of these trials which are being led by TfL and London Council's. Haringey's priority is active travel and the benefits associated with walking and cycling. However, we support the use of sustainable and safe micro-mobility options as a means of tackling private car use and reducing air pollution.





11.40 Reallocation of the kerbside space

11.41 The effective management of kerbside space is important for people walking and cycling. Footways and cycleways need to be coherent, easy to use, step free and safe. Badly parked cars, vans and lorries can seriously impact the ability of people walking and cycling, especially those who find either more difficult or have things or children with them.

11.42 It's not just ensuring existing kerbside space is protected that is important either. By making better use of road space we can provide more space for everyone. Many of our town centres are located on busy roads meaning walking and cycling to and through them can be difficult. Where possible especially near our towns and centres and places of interest we will strive to rebalance this by providing wider footways, space for people to cycle safely and more space to tree planting and greening.

11.43 We will include cycle parking as part of the parking mix in space normally only dedicated to car parking.

11.44 We will also look at opportunities to repurpose parking spaces into more active uses of kerbside space in locations near to retail. These alternative uses might include parklets to sit, rest, relax or socialise, eateries, and on-street cycle parking.

11.45 Our commitment to provide space for people to store cycles safely near their home will mean the introduction of more residential cycle hangars as part of the parking mix in Controlled Parking Zones (CPZs).

11.46 Street trees and planting

11.47 Street trees are a key part of a resilient street network, providing numerous benefits. They of course provide a vital home for nature and biodiversity but also help reduce flood risk by intercepting rainfall.

11.48 Trees are also great for people walking and cycling. They add to the street environment and provide colour, shade and affect levels of emissions, particulates and not forgetting happiness.

11.49 Wherever possible we will introduce street trees as part of our walking and cycling schemes. Considerations of access requirements, including pavement width, will be part of any design work to implement new trees.

11.50 Street Lighting and safety

11.51 Street lighting is key to ensure pedestrians feel safe on quieter streets. In addition to the projects identified in the delivery plan of this document, substantial wider council investment has bene committed to help meet the aims of the WCAP including with the Highways and Street Lighting Investment Plan.

11.52 The council will work across services areas to ensure our active travel schemes support community safety and tackle crime, working closely with the Metropolitan Police and their designing our crime officers.

11.53 Last mile

11.54 In order to deliver a successful transformation we will facilitate changes in the way in which business freight operates within the borough with a focus on facilitating the use of cargo bikes for last-mile deliveries for the businesses-to-business as well as business-to-customer.

11.55 Gateways

11.56 Where we make changes to streets, trees or planting could bookend streets in the borough. Combined with street design features that prioritise active travel and SUDS these gateways will announce to people they are entering a new street environment. This includes both into residential areas and town centres.

11.57 They will provide places to dwell on the way into and out of our commercial centres, and announce to drivers they are entering streets where people live, people will be walking and cycling, and children will be playing.

11.58 Electric charging points

11.59 Where we introduce electric charging points to support the adoption of electric vehicles in the

borough we will ensure this is not done at the cost of people walking and available footway space. Where charging points are installed
on the public highway we will locate them on build-outs in parking bays. As part of these electric charging point installations we will look to add planting, cycle parking and where feasible charging capability for both electric cars and e bikes.

11.60 **Public transport**

11.61 We recognise the important role of an efficient and reliable public transport network and the need to improve connections between cycling and this network. By providing connections to public transport interchanges and major stops in combination with secure cycle parking facilities visitors have greater travel choices. In addition, bus lanes can provide space for people cycling. As part of this WCAP we will:

- Carry out bus lane reviews to consider an increase in operational hours and where feasible make them wider so people can cycle in them and feel safer. This is particularly important where separate space for cycling can't be introduced.
- Introduce bus gates that benefit areas where people walking and cycling, and to improve bus journey times
- Build cycle routes to public transport interchanges and major stops
- Ensure high quality cycle parking that meets demand at public transport interchanges
- Make improvements to key walking routes to public transport interchanges

11.62 **Events**

11.63 The borough hosts a number of world class sporting and leisure destinations which are extremely well utilised throughout the year with visitors travelling from around the world to events. Provision for quality integrated transport is essential to ensure that visitors to these venues can travel sustainably using public transport, walking and cycling.

11.64 We are already working closely with venues and promoters to provide sustainable transport solutions for events whilst minimising the impact on residents and businesses.

11.65 The Tottenham Hotspur stadium redevelopment has provided infrastructure to support more people walking and cycling to the stadium, with Cycle Superhighway 1 already running to the stadium from the south. However we recognise that we need to do more to promote walking and cycling at all venues and ensure that there is a fully integrated walking and cycling strategy for all large venues.

11.66 **Play Streets**

11.67 Play streets were a common site across London and other cities in years gone by and have had a bit of a resurgence in recent years. They are a great way to explore the potential for streets to be used differently by people who live in them with places normally given over to moving motor vehicles for adults become places for children to socialise and play.

11.68 We will continue to work with local communities to get play streets implemented in Haringey and look to make permanent changes to streets to reduce motor vehicle access where play streets have shown the potential benefits. We hope to make it easier for residents to request and organise play streets including innovative ways to marshal them through the delivery of this WCAP.

11.69 **Car Free Day**

11.70 We fully support the Car Free Day initiative and will continue to support it in the borough. In fact we propose to start using the annual event as an opportunity to trial closing roads to motor traffic in our town centres but also in residential areas so people can have the opportunity to experience where they live with different traffic conditions.

11.71 This will allow streets and places in the borough to be used differently whilst we can learn what goes well and what doesn't with the aim of the making successful trials permanent in the longer term.

11.72 **Maintenance**

11.73 Routine maintenance, particularly resurfacing, provides an opportunity to change the look and feel of streets. The amount of line marking can be reviewed and where feasible removed to reduce vehicle dominance and soften street aesthetics.

11.74 Central hatching can be replaced with wider cycle and semi segregation as relatively cost- effective approaches to introducing space for cycling. Centre line markings can also be removed reducing the dominance of motor traffic.

12. Monitoring and learning

12.1 Monitoring where people walk and cycle and arguably more importantly where they don't helps inform our work on supporting active travel. It is also important to understand where traffic is heavy as this indicates where there are trips that could be switched to walking and cycling.

12.2 We have used existing data, and projections based on this such as the Strategic Cycling and Walking Analysis to evaluate our existing network and to understand where people would walk and cycle more if we made changes to support this.

12.3 Road danger is another area where we must understand what is happening on our streets and how changes we make alter things, both to ensure those changes are right and to improve on designs to make even better design solutions in the future.

12.4 Similarly, among the negative impacts and externalities of motor vehicle use are issues with air quality and emissions and the barriers to active travel and social inclusion that busy roads can be.

12.5 Throughout the lifecycle of the Walking and Cycling Action plan we intend to improve our monitoring capability for active travel. As schemes come forward, we will engage with the community to allow progress to be tracked and to be held accountable for delivery.

12.6 This will include a focus on both the numbers of people walking and cycling in Haringey, where people are, and aren't choosing to, and the negative externalities associated with motor traffic as described above. The table on the next page outlines our proposals for this action plan.



What we will monitor	Where we will monitor	How we will monitor
Number of people walking	On key walking routes, in town centres and residential areas	Surveys conducted as part of scheme development. Post implementation surveys (e.g. video, Pedestrian Level of Service) Dedicated pedestrian counters at key locations e.g. walking routes in new developments Gather data as part of public engagement surveys London Travel Demand Survey
Number of people cycling	On key walking routes, in town centres and residential areas	Surveys conducted as part of scheme development. Post implementation surveys (e.g. video, Pedestrian Level of Service) Dedicated cycle counters on cycleway network Gather data as part of public engagement surveys London Travel Demand Survey
Traffic volumes and speeds	On key routes, town centres and residential areas	Traffic speed and volume surveys Ibus data Engagement surveys Perception reports
Road danger	On key routes, town centres and residential areas	Traffic speed and volume surveys Collision data Engagement surveys Perception reports
Air quality	On key routes, town centres and residential areas	Air quality monitoring stations

Appendix A - Policy Context

13. Haringeypoliciesthat supportactivetravel

13.1 For any action plan to be successful it has to be supported by a commitment from those who will deliver it. In the preceding years to this action plan we have been talking to and workingwiththeresidentsandbusinessesof the borough to develop a number of key policies and strategies. This next section explains how our Walking and Cycling Action Plan is supported by and contributes to achieving the key aims and objectives of the borough and the people who live and work here.

13.2 Haringey Borough Plan (2019 – 2023)

13.3 The Borough Plan sets out our five priorities for Haringey. These priorities were developed following significant engagement with residents and partners.

13.4 The Borough Plan consists of a set of 20 outcomes, grouped under the five priorities, and measures of success for each of these outcomes. There are a number of outcomes
that are relevant to the delivery of the WCAP and the delivery of the WCAP would help achieve many of the outcomes of the borough plan.

13.5 In People the Borough Plan introduces the vision for a Haringey where strong families, strong networks and strong communities nurture all residents to live well and achieve their potential.

13.6 Outcome 5 is 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.



13.7 In Outcome 7: 'All adults are able to live healthy and fulfilling lives, with dignity, staying active, safe and connected in their communities'
the borough plan focuses on increasing life expectancy and removing health inequalities.

13.8 People Objective 8 states 'All adults are able to live healthy and fulfilling lives, with dignity, staying active, connected and free from harm in their communities' whilst Outcome 8 strives for 'Strong communities where people look out for and care for one another'.

13.9 All these outcomes and objectives can be supported or achieved through the delivery of high-quality walking and cycling infrastructure and there are other outcomes associated with mental health and wellbeing that overwhelming evidence suggests more people walking and cycling more can help achieve.

13.10 In Place the Plan focuses on the environment transport and sustainability and the links with this action plan is even more obvious with a vision for 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.. Outcome 9, 'a healthier, active and greener place' includes objectives to protect and improve parks and green space, plant more trees including on street and increased levels of physical activity and reduction in levels of emissions and poor air quality near schools. The Council's target is to increase physical activity by an average of 0.4 percentage points year on year by 2022/23 and deliver the Air Quality Action Plan.

13.11 Outcome 10 of the plan is 'a cleaner, accessible and attractive place aims to provide safer and accessible public spaces for everyone, safer and cleaner streets and a mode shift towards walking, cycling and public transport (81% by 2022/23, 88% by 2041).

13.12 Outcome 11: A culturally engaged place Foster strong and diverse cultural activities Support a range of events in the borough, from sport at White Hart Lane and music festivals in our parks, Improve connectivity around the borough especially for pedestrians and cyclists

13.13 Included in objectives to support the realisation of Outcome 11 is a commitment to deliver major infrastructure projects to improve transport links in the borough, including improvements at Tottenham Hale and Seven Sisters, and make it easier to cycle around and through the borough by working with Transport for London on new cycle routes and an improved walking, cycling and bus networks, as well as public transport interchanges. We will look to coordinate and manage all street works, liaising with utility companies, neighbouring



boroughs and Transport for London, to minimise disruption and congestion on the road network.

13.14 In Economy the plan aspires to a growing economy which provides opportunities for all our residents and supports our businesses to thrive. The Council wants to work with the community to build a growing economy and thriving local businesses, supported by a community wealth building approach.

13.15 Outcome 16 focuses on Regeneration with social and economic renewal at its heart, focused on Tottenham and Wood Green

13.16 In Your Council the plan focuses on the way the Council works. It focuses on the need to make savings and spend efficiently and effectively whilst stating the importance of engaging with residents and businesses in making change. Outcome 17 is a Council that engages effectively with its residents and businesses making them feel engaged and displaying high levels of trust. This includes innovative approaches to engagement using people centred design approaches ensuring involvement in the process.

13.17 Haringey Transport Strategy 2018

13.18 In 2018 Haringey adopted its Transport Strategy. The strategy has been designed to deliver a step change in transport policy for the borough, one that enables walking, cycling and public transport.

13.19 This means a shift in policy direction from prioritising motor vehicles to one of prioritising active travel and public transport.

13.20 The response to our public consultation on the strategy overwhelmingly supported the prioritisation of active travel and reducing the use of the motor car. People understood the need to tackle associated issues such as climate change, air pollution and improving the health and wellbeing of Haringey residents.

13.21 The strategy includes four key outcomes. Active travel, and more specifically enabling more walking and cycling is central to achieving these outcomes which are:

- A public transport network that is better connected, has greater capacity and is more accessible, supporting our growth ambitions
- Active travel the default choice, with more people choosing to travel by walking, cycling and public transport
- An improved air quality and a reduction in carbon emissions from transport
- A well-maintained road network that is less congested and is safer

13.22 The Transport Strategy will be delivered through a number of Action Plans, including this Walking and Cycling Action Plan, a Parking Strategy and the Local Implementation Plan.

13.23 There are a number of priorities included in the Transport Strategy that the WCAP can deliver. These include:

- To get more people to choose walking, cycling and public transport as means of travel by making Haringey one of the most cycling and pedestrian friendly boroughs in London
- To deliver our health ambitions by promoting active travel
- To improve air quality by pursuing projects and programmes to reduce vehicle use, particularly diesel powered vehicles and increase the use of electric vehicles for journey which need to be made by car.
- To support alternative means of transport to motor vehicles such as through behavioural change programmes and increasing car clubs/ car sharing
- To reduce road user casualties, especially among children, pedestrians, cyclists and other vulnerable road users
- To address the needs of mobility impaired users of all transport modes

13.24 To achieve these outcomes we will work with key partners such as the government, GLA, TfL, private sector developers, public transport operators, the community and the voluntary sector.

13.25 **Key facts included in the 2018 Transport Strategy are:**

- 56% of adults, 37% of 10/11 year olds and 23% of 4/5 year olds are overweight or obese
- Over 26% of the population in Haringey are physically inactive
- 3% of journeys are by cycle and 37% by walking
- Just under 40% of vehicle movements in Haringey could be replaced by cycling

13.26 **Local Implementation Plan 2019-2022**

13.27 Haringey's Local Implementation Plan (LIP) sets out how the Council intends to deliver more sustainable transport. The LIP includes the infrastructure and initiatives that will support the delivery of the transport objectives as outlined in the Mayor Transport Stratetgy (MTS).

13.28 Given the expected population growth, issues around capacity on the public transport network are only likely to get worse. The LIP also identifies the lack of coherent joined up cycle network in the borough, reducing the potential for active travel.

13.29 **Haringey Local Plan (2017)**

13.30 The Local Plan describes how the Council will address the need for local and strategic development. This includes the need for housing, employment opportunities, leisure, and retail provision.

13.31 SP7: Transport states: … 'the Council will work with its partners to promote the following key infrastructure proposals to support Haringey's regeneration and local/strategic access to London, employment areas and local services'.

13.32 Also of relevance to the WCAP the Local Plan states 'the Council, in cooperation with neighbouring boroughs, will seek to reduce the impact of larger lorries in local residential areas and town centres and investigate the feasibility of a freight distribution hub.'

13.33 The Council has started working on a New Local Plan with a First Steps engagement document published in 2020, working towards adoption in 2023.

13.34 **Air Quality Action Plan**

13.35 Haringey's Air Quality Action Plan (AQAP) outlines the action the borough will take to improve air quality in Haringey between 2019-2024. The plan highlights the adverse impacts on health of poor air quality and the often-strong correlation with equalities issues, because areas with poor air quality are also often the less affluent areas.

13.36 Haringey is committed to reducing the exposure of people in the Borough to poor air quality in order to improve health. The plan includes actions under seven broad topics:

A. 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 statutory duties undertaken by boroughs, which form the basis of action to improve pollution;

B. 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;

C. Public health and awareness raising increasing awareness can drive behavioural change to lower emissions as well as to reduce exposure to air pollution;

D. Delivery servicing and freight: vehicles delivering goods and services are usually light and heavy-duty diesel-fuelled vehicles with high primary NO2 emissions;

E. 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;

F. Localised solutions: these seek to improve the environment of neighbourhoods through a combination of measures; and

G. 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).

13.37 Climate Change Action Plan

13.38 In March 2021 the Council approved the Haringey Climate Change Action Plan (HCCAP) setting out how the borough will become net zero carbon by 2041. A zero-carbon borough is a huge ambition and to do this all have to make fundamental changes in everything that we do. We know that some communities in the borough do not have high car ownership, yet they are blighted by the worst air quality and their access to public transport and active travel options is limited. So, by improving sustainable transport options we deliver air quality and carbon reduction improvements, with healthier lifestyles and increase mobility to jobs and services. This WCAP supports the HCCAP in all its ambitions.

13.39 London policy context

13.40 Whilst the link between this WCAP and borough policies and strategies are important it is also vital that our work on walking and cycling supports the aims of the Mayor's Transport Strategy and the infrastructure we build meets the needs of our residents and visitors by opening up the borough to people walking and cycling.

13.41 Haringey's Physical Activation and Sports Strategy

13.42 The vision of Haringey's Physical Activity and Sport Strategy is to create and embed a culture of activity so that Haringey becomes one of the most physically active and healthy London boroughs. We want to ensure that all of Haringey's residents have the encouragement, opportunity and environment they need to lead active, healthy and fulfilling lives. By working collaboratively and cooperatively, as a whole system, we will seek to transform attitudes and behaviours and make it easier for residents to embed physical activity into their everyday lives.

13.43 The Mayor's Transport Strategy

13.44 The Mayor's Transport Strategy (MTS) is the guiding policy document for transport in London. The central aim is for 80 per cent of all trips in London to be made on foot, by cycle or using public transport by 2041.

13.45 We are committed to supporting the Mayor in achieving these aims. We have our own targets around walking, cycling and public transport that will contribute towards achieving the aims. This includes our bolder target of 88% of all trips in Haringey to be walking, cycling or public transport by 2041.

13.46 There are of course a number of aims and outcomes that are particularly relevant to the Walking and Cycling Action Plan:

- By 2041, for all Londoners to do at least the 20 minutes of active travel they need to stay healthy each day. For no one to be killed in or by a London bus by 2030, and for deaths and serious injuries from all road collisions to be eliminated from the streets by 2041.
- To reduce freight traffic in the central London morning peak by 10 per cent on current levels by 2026, and to reduce total London traffic by 10-15 per cent by 2041,
- To have 70 per cent of Londoners living within 400 metres of a high-quality, safe cycle route by 2041


COMMUNITY

13.47 Also included in the MTS are a number of outcomes that the WCAP can help deliver:

- Outcome 1 London's streets will be healthy, and more Londoners will travel actively
- Outcome 2 London's streets will be safe and secure
- Outcome 3 London's streets will be used more efficiently and have less traffic on them (annual vehicle km)
- Outcome 4 London's streets will be clean and green
- Outcome 5 The public transport network will meet the needs of a growing London
- Outcome 6 Public transport will be safe, affordable and accessible to all
- Outcome 7 Journeys by public transport will be pleasant, fast and reliable
- Outcome 8 Active, efficient and sustainable travel will be the best option in new developments

13.48 Outcome 9 Transport investment will unlock the delivery of new homes and jobs

13.49 **Liveable Neighbourhoods**

13.50 Liveable Neighbourhoods were a key part of the Mayor's Transport Strategy when it was launched providing a focus on delivering improvements for people walking, cycling and using public transport with the aim of reducing the negative externalities associated with transport in London. The Council is supportive of the principles behind Liveable Neighbourhoods but notes that they no longer appear to be a key part of the Mayor's Strategy and therefore recognises the need to adapt its approach going forward focused around promoted initiatives and available funding sources.

7.1 **Vision Zero**

7.2 Vision Zero is a new approach to road danger reduction being adopted by countries and cities across the world. London has placed itself at the forefront of this approach by developing its own Vision Zero Action Plan and including guiding principles in policies and strategies. The Mayor's Transport Strategy includes a goal that, by 2041, all deaths and serious injuries will be eliminated from London's transport network. This is supported by the Vison Zero Action Plan that includes the following outcomes:

- **Safe speeds:** Encouraging speeds appropriate to the streets of a busy and populated city through the widespread introduction of new lower speed limits
- **Safe streets:** Designing an environment that is forgiving of mistakes by transforming junctions which see the majority of collisions, and ensuring safety is at the forefront of all design schemes
- **Safe vehicles:** Reducing risk posed by the most dangerous vehicles by introducing a world-leading Bus Safety Standard across London's entire bus fleet and a new 'Direct Vision Standard' for Heavy Goods Vehicles
- **Safe behaviours:** Reducing the likelihood of road users making mistakes or behaving in a way that is risky for themselves and other people through targeted enforcement, marketing campaigns, education programmes and safety training for cyclists, motorcycle and moped riders
- **Post-collision response:** Developing systematic information sharing and learning, along with improving justice and care for the victims of traffic incidents

7.3 **Healthy Streets**

- Healthy Streets is part of TfL's new approach to looking at streets and what they provide for people. It uses a set of indicators that can be used to assess existing highway layouts and proposed layouts to see if they will deliver for people. The Healthy Streets indicators are:
- Pedestrians from all walks of life
- People choose to walk and cycle
- Clean air
- People feel safe
- Not too noisy
- Easy to cross
- Places to stop and rest
- Shade and shelter
- People feel relaxed
- Things to see and do

7.4 Adopting the Healthy Streets approach should lead to improvements against these indicators when change is made. The approach is embedded in TfL's delivery approach including that of the Liveable Neighbourhoods programme with the

outcomes of both contributing to Healthy Streets and Healthy People in the Mayor's Transport Strategy 2018.

7.5 TfL Planning for Walking toolkit

7.6 The recently launched Planning for Walking Toolkit gives advice for planners and designers involved in the redesign or creation of public realm, including streets, off-road footpaths and public spaces across London.

7.7 Ensuring good practice urban design principles are embedded in the planning and design process for all publicly accessible parts of the city is a central theme.

7.8 The document highlights the different types of walking trips and importance of walking especially as part of public transport journeys. The toolkit states that nearly all public transport trips include at least one walking journey stage, with people walking on average between four to 10 minutes to reach public transport.

7.9 People walk more if they live in an area that has good public transport. The toolkit states the importance to work collaboratively with local authorities, developers and landowners to create a cohesive accessible and inclusive city- wide walking network.

7.10 The toolkit introduces the importance of the Healthy Streets approach and working with the local community to develop ideas.

7.11 Three scales of delivery are required to fulfil these objectives:

- At the city level planning for London's rapid growth by better integrating transport modes that are linked by walking trips. Better understanding walking as part of connected trips is crucial for encouraging more walking, particularly in outer London.
- At the neighbourhood level planning for walking as part of area wide initiatives is vital so that people can access local amenities, employment zones and town centres by foot easily and conveniently. New developments should be designed for active travel and link with existing areas successfully.
- At the local place level designing high-quality environments with enough space for dwelling, walking, cycling and public transport use. Streets should be designed for people walking and reduce the dominance of motor vehicles. A well-designed street has the potential to act as the stage for events and activities that will entice people out to shop, play and socialise.
- Project proposals for improvements to the experience of walking should align with design objectives set out across each of these scales, to ensure that there is a continuity of design approach that is backed up by evidence.
- The Walking Action Plan sets out a spatial approach for delivering improvements to encourage walking by highlighting priorities across central, inner and outer London. It suggests that planners working out a design brief for a specific street should align design requirements with the following general spatial priorities where appropriate. The plan suggests that in Haringey, (located in inner London) these should:
- Improve walking access to high streets and town centres, by reducing severance over major roads through the upgrade or installation of new crossing facilities and creating more attractive walking routes
- Improve walking access to key transport hubs and strategic interchanges by enhancing the quality of the public realm and the space allocated for people to walk.

7.12 Borough and Local Area Walking Plans

7.13 Local authorities in London are encouraged to produce a local walking plan that sets out clear objectives for strategising public realm interventions that are based on the local characteristics and priorities of the borough.

7.14 The toolkit suggests that a walking plan would consist of a vision statement and a target for increasing walking trips over a defined period of time that would lead to a series of objectives with a clear list of demonstrable measures to gauge progress. These objectives would be rooted in a clear evidence base that demonstrates key issues for walking and relates development priorities to overcoming barriers to walking, while linking existing and planned trip attractors.

7.15 Some of the city scale tools presented in Part C provide guidance for how this can be undertaken. At a more detailed level, the local

walking plan should, alongside supplementary Area Action Plans and Neighbourhood Plans, set out area-based priorities, such as:

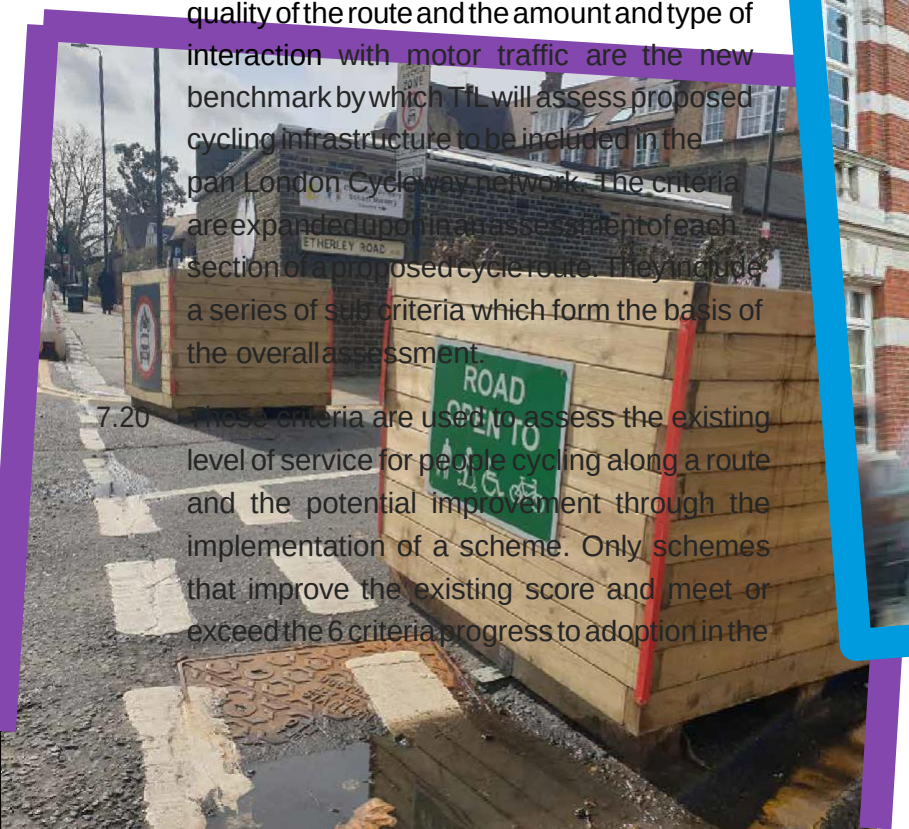
- improvements needed for links to schools and transport hubs
- mitigation of severance issues
- integration of new developments
- reduction of crime through improvements to natural surveillance
- increasing active frontage and land use mix
- maximising the connectivity and quality of local open green spaces and towpaths

7.16 The London Cycle Design Standards (LCDS)

7.17 The London Cycle Design Standards is the go- to document for cycle design in London. LCDS is split into 9 chapters that focus on different aspects of designing for people cycling including solutions for different street types, junction design and consideration of different types of cycles and accommodating those who are less experienced, confident or require more consideration.

7.18 The Cycleway Assessment Criteria

7.19 TfL's Cycleway Assessment is based upon 6 critical criteria. These criteria that focus on the quality of the route and the amount and type of interaction with motor traffic are the new benchmark by which TfL will assess proposed cycling infrastructure to be included in the pan London Cycleway network. The criteria are expanded upon in an assessment of each section of a proposed cycle route. They include a series of sub criteria which form the basis of the overall assessment.



7.20 These criteria are used to assess the existing level of service for people cycling along a route and the potential improvement through the implementation of a scheme. Only schemes that improve the existing score and meet or exceed the 6 criteria progress to adoption in the Cycleway network. The criteria which will be an integral part of the development of Haringey's Cycle Network are included below:

- Total volume of motor traffic (where people cycling would mix with traffic)
- Speed of motor traffic (where people cycling would be sharing with general traffic)
- Appropriate width for cycling
- Kerbside activity has a minimal impact on people cycling
- Interaction between heavy goods vehicles (HGVs) and people cycling minimised
- Collision risk between people cycling and turning vehicles minimised



Appendix B

Covid-19 Borough-wide Active Travel Response

8. Introduction

8.1 The outbreak of the Covid-19 pandemic has impacted the development and delivery of our Walking and Cycling Action Plan.

8.2 The need to provide space for people to socially distance whilst safely walking to shops or cycling to work and avoiding public transport has amplified the need to rethink how space is allocated on our streets. This can and has already influenced the development of the WCAP.

8.3 **Policy and guidance**

8.4 The unique circumstances of the Covid-19 pandemic led the government and more locally the Mayor of London to announce widespread changes to the way local authorities were to manage streets in the short to medium term and how funding was to be allocated and distributed.

8.5 **Department for Transport**

8.6 The Department for Transport launched its Covid-19 response in March 2020 with amendments to the statutory consultation process aimed at helping local authorities introduce measures to provide more space for people walking and cycling quickly.

8.7 The Secretary of State for Transport has stated the importance of local authorities prioritising space for people walking, cycling and public transport in addition to more space for people to socially distance whilst in town centres and other busy places.

8.8 **Transport for London**

8.9 In London, the Mayor of London announced a number of key policies and structural changes to funding, that have had a significant impact on the development and delivery of the WCAP and other transport programmes and schemes. Business as usual funding has at the time of writing been ceased for Local Implementation Plans (LIPs) and other TfL funded programmes such as the Liveable Neighbourhood programme.

8.10 This has meant a cessation on all planned works with the aim of delivering a rapid city-wide response. TfL launched the 'Streetspace for London' programme of work focused on enabling more people to walk and cycle through three key areas:

- Quickly building a strategic cycling network, using temporary materials and including new routes, to help reduce crowding on the tube and trains and on busy bus routes
- Changing town centres so local journeys can be safely walked and cycled where possible, for example with wider pavements on high streets to give space for queues outside shops as people safely walk past while socially distancing
- Reducing traffic on residential streets, creating low-traffic corridors right across London so

more people can walk and cycle as part of their daily routine

8.11 Funding

8.12 A series of funding sources have been made available from both the Department for Transport and Transport for London.

8.13 These opportunities were for local authorities to develop and deliver schemes that could be implemented rapidly using temporary materials and then converted into permanent schemes at a later date if successful.

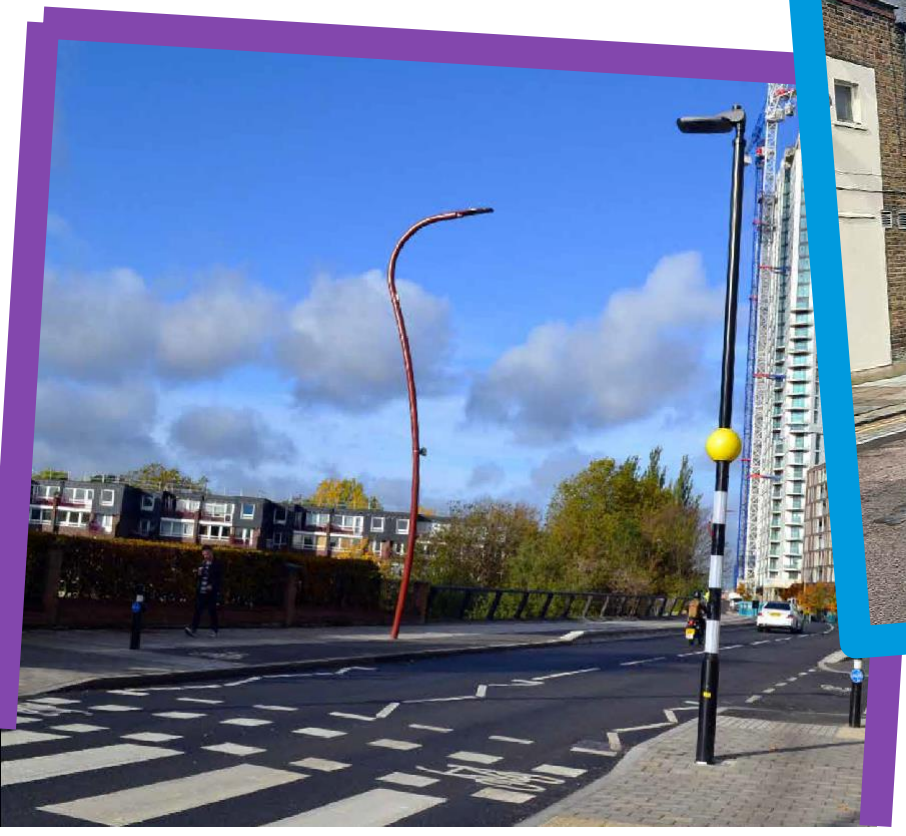
8.14 Haringey's Transport & Highways response to Covid-19

8.15 Once we understood that Covid-19 and the associated restrictions on travel and contact were here to stay for a while we knew the council had to act quickly in some instances, particularly places where footway widths didn't permit social distancing. We also set about planning, for our response to Covid-19 in the short term, and how we can transition from the current situation with temporary and experimental solutions to reallocate space into a robust permanent high-quality walking and cycling network for Haringey. In line with TfL guidance and our own developing WCAP this included looking at key strategic cycle routes and the best areas for consideration for low traffic neighbourhood type treatments.

8.16 Covid-19 has led to an acceleration in the delivery and a reprioritise of a number of key active travel projects we had already planned and the need for a number of other new projects. These include key strategic cycle routes to help people cycle safely in the borough to town centres, schools and green spaces and from the borough to further afield to work or socialise.

8.17 Informing and engaging

8.18 To support our Covid-19 response, help develop the WCAP to inform the longer term development, we engaged the community in conversation over road space, priorities and design using the online engagement platform Commonplace. As part of the borough's





response to Covid-19 we asked people who live, work, study and travel through Haringey about how to:

- make it easier and safer for people to walk and cycle locally,
- shop on their local high street,
- reach their local green spaces, schools and NHS sites,
- maintain social distancing and
- how best to avoid an unacceptable increase in car use and congestion.

8.19 The next section of this document focuses on the schemes that were developed as part of our Covid-19 borough-wide active travel response.

8.20 **New Cycleways**

8.21 The development of a London wide temporary strategic cycle network is a core part of TfL's response to the Covid-19 pandemic.

8.22 Details on our cycleway schemes prioritised during the Covid 19 pandemic and an update on their progress can be found on our website: **https://www.haringey.gov.uk/parking-roads-and-travel/travel/transport-strategy/haringey-s-streetspace-plans**

8.23 **Low Traffic Neighbourhoods**

8.24 Another strand of TfL's Streetspace for London programme and supported by Covid-19 reactive government transport policy is the introduction of Low Traffic Neighbourhoods.

8.25 To find out more about our LTN projects please visit our website - **www.haringey.gov.uk/ parking-roads-and-travel/travel/transport-strategy/low-traffic-neighbourhoods-haringey**

8.26 **Footway Widening**

8.27 As an immediate reaction to the need for more space for people to walk to the shop queue safely and visit vital amenities we introduced temporary pavement widening schemes at a number of locations.

8.28 A tranche of 19 schemes were funded retrospectively by TfL. These locations, which have all been removed, can be found on our website - **www.haringey.gov.uk/parking-roads-and-travel/travel/transport-strategy/haringey-s-streetspace-plans**

8.29 In addition to the immediate pavement widening schemes, further locations in the borough that required pavement widening have been identified in partnership with local businesses and residents. Haringey's Highways service already has a programme for pavement improvement which will form the basis of any decisions on future pavement widening schemes.

8.30 **School Streets**

8.31 As part of our response to Covid-19 we looked at the space available in front of our schools with the aim of providing more space for socially distanced walking, cycling and scooting to school. We have looked at all school in the boroughs with this aim in mind and have developed proposals to increase space for people.

8.32 At some locations this will involve closing the street in front of the school entrance either fully or partially at school arrival and departure times. At other schools we are widening pavements to enable social distancing. Further information on School Streets can be found in the Delivery Plan. **www.haringey.gov.uk/parking-roads-and-travel/travel/smarter-travel/school-streets**

Appendix C
WCAP Delivery Plan

*All projects, costings, and delivery periods subject to funding

**Feasibility and delivery periods to be reviewed based on £5.1m Capital Programme/ Strategic CIL funding and external DfT/TfL funding

***LIP funding subject to confirmation by TfL (currently suspended pending a TfL agreeing a long-term funding settlement with Government)

****Funding indicated in delivery plan supplemented by wider Council investment which will support WCAP objectives including planned investment in highways and lighting



Haringey LONDON

Cycleways

Project name	Design Approach	Description overview	Cost Estimate (range / ££)	Feasibility (traffic light)	Delivery period	Funding Status as of March 2022
Finsbury Park to Wood Green (Wightman Road)	Protected Cycle Lane/ Low Traffic	A new cycle route linking Finsbury Park and Wood Green has been identified as a high priority route in the cycle network and was included in Haringey's bids to TfL's Streetspace for London proposals. There is a need to reduce the capacity of busy stations, particularly on the Piccadilly line, to prevent overcrowding. Wightman Road is the focus of the cycleway. This alignment would connect into the strategic cycle network, linking with Islington and Hackney, and would provide an attractive alternative option for residents wanting to avoid the Piccadilly Line and choosing to cycle. Locally the route will connect key centres in the borough, reducing the likelihood that people will resort to drive for local trips.	£560,000		0 -1 year	Funded – TfL LIP SCIL
CS1 extension into Enfield	Protected Cycle Lane	The extension of Cycleway 1 will provide a cycling corridor that extends from Liverpool Street to the borough boundary into LB Enfield. It will provide a viable alternative to public transport especially for people who would normally travel on the rail network or the Piccadilly and Victoria Lines. The extension would enable a direct connection to Enfield's Mini-Holland network and extend CS1 to Ponders End. This route was identified on the Streetspace for London Temporary Strategic Cycle Network mapping as a key strategic route.	£220,000		0-1 year	Funded – TfL LIP SCIL
Crouch End Hornsey Cycleway	Protected Cycle Lane	The cycleway builds on the design and engagement undertaken for the Liveable Crouch End scheme to provide a cycle-route that connects Wood Green (via Quietway 10 - another project listed here) with the top of LB Islington using segregation separators, road markings and footway construction to bring the cycleway to footway level at certain points. The route goes through the centre of Crouch End and provides for the most part a segregated route that will encourage greater cycling, thereby removing the pressures on bus usage (which is historically high in this area) and reducing journeys made by car. The connection was identified in the TfL temporary strategic cycling analysis as an area of top and high potential for future cycle trips.	£433,000		0-1 year	Partially funded (received 46,000 for design from TfL) Funded – TfL LIP SCIL

Project name	Design Approach	Description overview	Cost Estimate (range / ££)	Feasibility (traffic light)	Delivery period	Funding Status as of October 2021
St Ann's Road	Protected Cycle Lane / Low Traffic	This route will connect Green Lanes with Seven Sisters utilising the interventions implemented through the proposed St Ann's LTN	£350,000		1 - 2 years	Funded – TfL LIP SCIL
Lordship Lane	Protected Cycle Lane	This route along Lordship Lane will provide an important east-west connection between Wood Green and CS1 using protected cycle facilities throughout Lordship Lane.	£450,000		1 - 2 years	Funded – TfL LIP SCIL
White Hart Lane	Protected Cycle Lane	Protected cycle facilities will be introduced between High Road (A105) and Great Cambridge Road (A10) which would connect existing London Cycle Network (LCN) cycle routes with Haringey's CS1 extension into Enfield	£550,000		1 - 2 years	Funded – TfL LIP SCIL
Cycle Future Route 2 (CFR2)	Protected Cycle Lane	As part of Transport for London's 2017 Strategic Cycling Analysis the cycling routes with the highest demand and future potential were identified using travel data and demographics. The route with the second highest potential is Cycle Future Route 2 which runs along Seven Sisters Road from Finsbury Park towards Tottenham Hale via Amhurst Park in Hackney and joining the CS1 route at Stamford Hill. The route has now been identified as a high priority route as part of the TfL Streetspace for London Temporary Cycle Network. CFR2 would link with CS1 at South Tottenham/Seven Sisters better connecting Enfield (via our other project for extending CS1), Hackney, Islington, Camden and Waltham Forest, into and through Haringey. It will connect to the Waltham Forest network via Tottenham Hale, providing thousands with a high-quality viable alternative to using the Piccadilly or Victoria Lines. CFR2 is on the TLRN and borough roads. Our proposal is for the whole route but we have identified the sections Haringey could deliver independently on borough roads, and the parts we would like to develop with TfL.	£620,000		1 - 2 years	Funded – TfL LIP SCIL

Project name	Design Approach	Description overview	Cost Estimate (range / ££)	Feasibility (traffic light)	Delivery period	Funding Status as of October 2021
Quietway 10	Protected Cycle	The alignment for Quietway 10 has been under development in partnership with Transport for London and with the assistance of Sustrans since 2017. The route links Bowes Park with Farringdon and travels through the borough via Bounds Green, Alexandra Palace, Wood Green, Hornsey, Crouch End and Finsbury Park. The cycle route includes a combination of quiet streets and off-road sections through parkland. The northern section of the route has partly been implemented and our proposal is to deliver the remainder of the northern section from Palmerston Road to Heartlands School, Station Road N22.	£420,000		1-2 years	Funded – TfL LIP SCIL
Bounds Green Road (Wood Green to A406)	Protected Cycle Lane	This route will link Bounds Green with Wood Green and the A406, connecting with existing and proposed cycling route.	£200,000		1-2 years	Funded – TfL LIP SCIL
Brantwood Road	Protected Cycle Lane	This route will propose protected cycle facilities along Brantwood Road which is dominated by light-industrial traffic generated by the adjoining uses on the eastern end of the road.	£220,000		1-2 years	Unfunded
Hartington Park	Protected Cycle Lane	This route will connect the High Road A1010 route with the A1010 cycle route. A majority of the route would be through Hartington Park and use Scotland Green (which could connect onward to Pembury Road).	£75,000		1-2 years	Unfunded
Finsbury Park – Bruce Grove (via. North Grove)	Protected Cycle Lane	This route will be aligned from Finsbury Park to Bruce Grove via North Grove accessing parks along the route and using the LTN proposal for St Ann's to provide a combination of low traffic sections and protected cycleways	£250,000		1-3 years	Unfunded
Finsbury Park – Bruce Grove (via. Chestnuts Park)	Protected Cycle Lane, Low Traffic, Quiet Open Space route	This route will be aligned from Finsbury Park to Bruce Grove via Chestnuts Park accessing parks along the route and using the LTN proposal for St Ann's to provide a combination of low traffic sections and protected cycleways	£250,000		1-3 years	Unfunded
Endymion Road	Protected Cycle Lane	This route will infill a gap in the cycling network between the Hornsey Gate entrance to Finsbury Park with Alroy Road (B138).	£120,000		1-3 years	Funded – TfL LIP SCIL

Project name	Design Approach	Description overview	Cost Estimate (range / ££)	Feasibility (traffic light)	Delivery period	Funding Status as of October 2021
East Finchley – New Southgate	Protected Cycle Lane	This route will connect existing cycle facilities in East Finchley with Bounds Green, the A406, LB Barnet and LB Enfield.	£250,000		1-3 years	Unfunded
Crouch Hill – Stroud Green	Protected Cycle Lane	This route will provide a short section of protected cycle facility between Stroud Green and Parkland Walk (and connect onto a future LB Camden route).	£200,000		1-3 years	Unfunded
Tottenham Hale-Northumberland Park	Protected Cycle Lane	This route is needed to connect CS1 with Tottenham and Northumberland Park. The alignment is currently well used as an alternative north-south vehicle route, particularly along Park View Road/ Havelock Road. The main focus therefore is the need to reduce vehicle flows along this section of the route. This could require a wider Low Traffic approach to the area bound by: Park Lane/ High Road (A1010)/ Watermead Way/ Shelbourne Road	£200,000		1-3 years	Funded – TfL LIP SCIL
West Green Road	Protected Cycle Lane	This route will connect Turnpike Lane and Seven Sisters station following West Green Road.	£400,000		1-3 years	Unfunded
Westbury Avenue	Protected Cycle Lane	This route will introduce protected cycle facilities between Turnpike Lane and Lordship Lane	£250,000		1-3 years	Unfunded
Alexandra Park Road	Protected Cycle Lane	This route will introduce protected cycle facilities between Albert Road (B106) and Buckingham Road.	£250,000		2-3 years	Unfunded
Alexandra Park – Muswell Hill	Protected Cycle Lane	This route will connect Muswell Hill to Alexandra Palace and towards Colney Hatch Lane	£350,000		2-3 years	Unfunded
Turnpike Lane – Muswell Hill	Protected Cycle Lane	This route will provide an important new east-west cycle link between Turnpike Lane and Muswell Hill connecting several other proposed and existing cycle routes.	£350,000		2-3 years	Funded – TfL LIP SCIL
Highgate – Muswell Hill	Protected Cycle Lane	This route will connect Highgate and Muswell Hill using Southwood Lane/Muswell Hill Road (B550).	£350,000		2-3 years	Unfunded
Finsbury to Wood Green (Green Lanes)	Protected Cycle Lane/ Low Traffic	This route will connect Finsbury Park and Wood Green and provide an alternative route to the Wightman Road route listed above. This route will connect Hackney and Enfield through Haringey and provide an important north/south cycling connection in the borough.	£400,000		2-3 year	Funded – TfL LIP SCIL

Project name	Design Approach	Description overview	Cost Estimate (range / ££)	Feasibility (traffic light)	Delivery period	Funding Status as of October 2021
High Road (A1010)	Protected Cycle Lane	The A1010 is the Borough's key north-south connection between Hackney and Enfield for vehicular traffic, buses as well as walking and cycling. A new cycle route will need to balance the needs of existing bus infrastructure on the A1010 with new cycle facilities. The design focus would be on the introduction of protected cycle facilities along the A1010 from Seven Sisters station to the borough boundary with LB Enfield.	£650,000		2-3 years	Unfunded
High Road (A105)	Protected Cycle Lane	This route will provide another cycling connection into LB Enfield, providing an important north-south cycling link connecting to Haringey's proposals for a Wood Green to Finsbury Park Cycleway.	£600,000		2-3 years	Unfunded
The Roundway	Protected Cycle Lane	This route will Introduce protected cycle facilities between Lordship Lane and Great Cambridge Road.	£300,000		2-3 years	Unfunded
Shepherds Hill/ Wolseley Road	Protected Cycle Lane	This route will introduce protected cycle facilities in both directions to provide a connection between Highgate and Crouch End.	£200,000		2-3 years	Unfunded
Fortis Green	Protected Cycle Lane	This route will introduce protected cycle facilities on Fortis Green + Queen's Avenue (A504) to connect East Finchley and Muswell Hill.	£250,000		2-3 years	Unfunded
Wolves Lane	Protected Cycle Lane/ Low Traffic	This route would introduce protected cycle facilities in sections of Wolves Lane up to the borough boundary with Enfield north of Lyndhurst Road. There is potential to link this route into the LTN proposals for Bounds Green and Bowes Park	£200,000		3-5 years	Unfunded
Archway – East Finchley	Protected Cycle Lane	This route will provide protected cycle facilities on the A1 to connect Archway, Highgate and East Finchley.	£350,000		3-5 years	Unfunded
Woodside Avenue	Protected Cycle Lane	This route will provide protected cycle facilities along Woodside Avenue to connect Great North Road and Muswell Hill Road.	£200,000		3-5 years	Unfunded
Midhurst Avenue	Protected Cycle Lane	This is a cycling access improvement project introducing a modal filter on Woodside Avenue north of the junction with Lancaster Road/Fordington Road	£200,000		3-5 years	Unfunded
North Hill- Hampstead Heath	Protected Cycle Lane/ Low Traffic	This route will provide protected cycling facilities between North Hill and Hampstead Heath	£350,000		3-5 years	Unfunded
		TOTAL	**£11,018,000.00**			

Low Traffic Neighbourhoods	Design Approach	Description overview	Cost Estimate	Feasibility	Delivery period	Funding Status as of October 2021
Bounds Green	Low Traffic Neighbourhood	A response to Bowes Park LTN implemented by Enfield. Planters, modal filters, ANPRs, improved permeability and environment for walking and cycling.	£290,000		0-1 years	Funded - £240,000 from TfL
St Ann's	Low Traffic Neighbourhood	Planters, modal filters, ANPRs, improvement walking and cycling environment, retaining pedestrian and cycling permeability.	£300,000		0-1 years	Funded - £302,000 from TfL
Bruce Grove/West Green	Low Traffic Neighbourhood	Modal filters, planters, ANPRs, improving walking and cycling environment	£325,000		0-1 years	Funded - £325,000 from TfL
Alexandra Palace North	Low Traffic Neighbourhood	Modal filters, planters, ANPRs, improving walking and cycling environment	£250,000		Subject to consultation	Funded – TfL LIP SCIL
Broad Lane, Tottenham	Low Traffic Neighbourhood	Removing through traffic from residential streets with modal filters	£250,000		Subject to consultation	Unfunded
Colney Hatch (east)	Low Traffic Neighbourhood	Planters, ANPRs, reducing rat running to improve walking and cycling environment	£250,000		Subject to consultation	Unfunded
Colney Hatch (west)	Low Traffic Neighbourhood	Modal filters, planters, ANPRs, improving walking and cycling environment	£250,000		Subject to consultation	Unfunded
Crouch End (east)	Low Traffic Neighbourhood	Removing through traffic from residential streets with modal filters	£250,000		Subject to consultation	Unfunded
Crouch End (north)	Low Traffic Neighbourhood	Removing through traffic from residential streets with modal filters	£250,000		Subject to consultation	Unfunded
Crouch End (West)	Low Traffic Neighbourhood	Removing through traffic from residential streets with modal filters	£250,000		Subject to consultation	Unfunded
Highgate (East)	Low Traffic Neighbourhood	Removing through traffic from residential streets with modal filters	£250,000		Subject to consultation	Unfunded
Highgate (west)	Low Traffic Neighbourhood	Modal filters aiming to remove through traffic from residential streets and improvements to walking and cycling environment	£250,000		Subject to consultation	Unfunded

Low Traffic Neighbourhoods	Design Approach	Description overview	Cost Estimate	Feasibility	Delivery period	Funding Status as of October 2021
Lordship North	Low Traffic Neighbourhood	Removing through traffic from residential streets using modal filters, improvements to walking and cycling environments	£250,000		Subject to consultation	Unfunded
Manor House	Low Traffic Neighbourhood	Planters, modal filters, ANPRs, improvement walking and cycling environment, retaining pedestrian and cycling permeability.	£250,000		Subject to consultation	Unfunded
North Tottenham	Low Traffic Neighbourhood	Planters, ANPRs, reducing rat running to improve walking and cycling environment	£250,000		Subject to consultation	Funded – TfL LIP SCIL
South Tottenham	Low Traffic Neighbourhood	Modal filters aiming to remove through traffic from residential streets and improvements to walking and cycling environment	£250,000		Subject to consultation	Unfunded
Stroud Green	Low Traffic Neighbourhood	Modal filters, improvements to walking and cycling environment through removal of rat running	£250,000		Subject to consultation	Unfunded
The Gardens East	Low Traffic Neighbourhood	Planters, modal filters, ANPRs, improvement walking and cycling environment, retaining pedestrian and cycling permeability.	£250,000		Subject to consultation	Unfunded
Tottenham Green	Low Traffic Neighbourhood	Planters, modal filters, ANPRs, improvement walking and cycling environment, retaining pedestrian and cycling permeability.	£250,000		Subject to consultation	Unfunded
Turnpike Lane East	Low Traffic Neighbourhood	Modal filters, planters, ANPRs, improving walking and cycling environment	£250,000		Subject to consultation	Unfunded
White Hart Lane north	Low Traffic Neighbourhood	Modal filters, planters, ANPRs, improving walking and cycling environment	£250,000		Subject to consultation	Unfunded
Wightman Road / Harringay Ladder	Low Traffic Neighbourhood	Planters, ANPRs, reducing rat running to improve walking and cycling environment	£250,000		Subject to consultation	Unfunded
Wood Green East	Low Traffic Neighbourhood	Modal filters, planters, ANPRs, improving walking and cycling environment	£250,000		Subject to consultation	Unfunded
Wood Green West	Low Traffic Neighbourhood	Removing through traffic from residential streets with modal filters	£250,000		Subject to consultation	Unfunded

Low Traffic Neighbourhoods	Design Approach	Description overview	Cost Estimate	Feasibility	Delivery period	Funding Status as of October 2021
Woodside	Low Traffic Neighbourhood	Removing through traffic from residential streets with modal filters	£250,000		Subject to consultation	Unfunded
		TOTAL	**£6,415,000.00**			

Walking Schemes

Scheme	Brief description	Design Approach	Cost Estimate	Feasibility	Delivery period	Funding	Funding Status
Vulnerable road user strategy / Accident reduction strategy/ Local safety schemes	Recommendations from study	Accident Analysis, accident reduction strategy, crossing facilities and other factors to improve pedestrian/ cycle safety.	£350,000		Annually	TBC Capital/ LIP	Funded – TfL LIP SCIL
Pavement parking	Areas with restricted footways as per LSP bids	Single or double yellow lines and relocation of parking spaces where possible	£100,000		Annually	TBC Capital/ LIP	Funded – TfL LIP SCIL
Pedestrian crossing, dropped curbs / tactile pavement	Increasing/improving Crossing points boroughwide	New/improved crossing points across Haringey	£150,000		Annually	TBC Capital/ LIP	Funded – TfL LIP SCIL
School travel plan - walking	Crossing points/ pavement widening in the vicinity of schools	New/ improved crossing points as identified by school travel plans to aid travel by sustainable modes of transport	£100,000		Annually	TBC Capital/ LIP	Funded – TfL LIP SCIL
Pavement Improvements – Major Maintenance works	Pavement improvements across the borough	Safety improvements for pavement users	£190,000		Annually	TBC Capital/ LIP	Funded – TfL LIP SCIL
Wayfinding	Improvements to legibility of walking routes to and from town centres and leisure destinations	Signage including legible London and fingerpost	£80,000		Annually	TBC LIP/ growth area funding/ S106	Funded – TfL LIP SCIL
Walking routes	Improved accessibility and permeability to leisure routes	Dropped kerbs, tactile paving, signage, limited resurfacing	£120,000		Annually	TBC Capital/ growth area funding/ S106/ parks	Funded – TfL LIP SCIL

Scheme	Brief description	Design Approach	Cost Estimate	Feasibility	Delivery period	Funding	Funding Status
Walking zones for town centres	Improved walking environment in town centres	Increase paving widths where possible by decluttering, increased signage and relocation of a road space	£200,000.00		Annually	TBC Capital/ growth area funding/ S106	Funded – TfL LIP SCIL
		TOTAL	**£1,290,000.00**				

School Streets

School name	Design Approach (permanent closure, ANPR, pavement widening, timed closure?)	Brief description	Cost Estimate	Feasibility	Delivery period	Funding	Funding Status as of October 2021
Holy Trinity Primary School	ANPR cameras and minor engineering works on the streets	School received temporary pavement widening measures or highways management measures planned in response to COVID. Measures will be converted to be long term.	£80,000.00		1 year	LIP/ capital/ other sources	Funded
Welbourne Primary School	ANPR cameras and minor engineering works on the streets	School received temporary pavement widening measures or highways management measures planned in response to COVID. Measures will be converted to be long term.	£80,000.00		1 year	LIP/ capital/ other sources	Funded
Alexandra Primary School	ANPR cameras and minor engineering works on the streets funded through Wood Green Good Growth	School received temporary pavement widening measures or highways management measures planned in response to COVID. Measures will be converted to be long term.	£200,000.00	amber	2-3 years	LIP/ capital/ other sources	Funded
Tiverton Primary School	ANPR cameras and minor engineering works on the streets	School received temporary pavement widening measures or highways management measures planned in response to COVID. Measures will be converted to be long term.	£80,000.00		1 year	LIP/ capital/ other sources	Funded
St Francis de Sales Roman Catholic Primary School	ANPR cameras and minor engineering works on the streets	School received temporary pavement widening measures or highways management measures planned in response to COVID. Measures will be converted to be long term.	£200,000.00		1 year	LIP/ capital/ other sources	Funded

School name	Design Approach (permanent closure, ANPR, pavement widening, timed closure?)	Brief description	Cost Estimate	Feasibility	Delivery period	Funding	Funding Status as of October 2021
St Pauls Catholic Primary School, Wood Green	ANPR cameras and minor engineering works on the streets	School received temporary pavement widening measures or highways management measures planned in response to COVID. Measures will be converted to be long term.	£120,000.00		1 year	LIP/ capital/ other sources	Funded
Earlsmead Primary School	ANPR cameras and minor engineering works on the streets	School received temporary pavement widening measures or highways management measures planned in response to COVID. Measures will be converted to be long term.	£120,000.00		1 year	LIP/ capital/ other sources	Funded
Lancasterian Primary School/The Vale Primary School	ANPR cameras and minor engineering works on the streets	School received temporary pavement widening measures or highways management measures planned in response to COVID. Measures will be converted to be long term.	£200,000.00		1 year	LIP/ capital/ other sources	Funded
Chestnuts Primary School	ANPR cameras and minor engineering works on the streets	School received temporary pavement widening measures or highways management measures planned in response to COVID. Measures will be converted to be long term.	£120,000.00		1 year	LIP/ capital/ other sources	Funded
Coldfall Primary School	ANPR cameras and minor engineering works on the streets	School received temporary pavement widening measures or highways management measures planned in response to COVID. Measures will be converted to be long term.	£120,000.00		1 year	LIP/ capital/ other sources	Funded
Crowland Primary School/ Gladesmore Secondary	ANPR cameras and minor engineering works on the streets	School received temporary pavement widening measures or highways management measures planned in response to COVID. Measures will be converted to be long term.	£200,000.00	amber	2-3 years	LIP/ capital/ other sources	Funded
St Ann's Church of England Primary School	ANPR cameras and minor engineering works on the streets	School received temporary pavement widening measures or highways management measures planned in response to COVID. Measures will be converted to be long term.	£200,000.00		1 year	LIP/ capital/ other sources	Funded
West Green Primary School	ANPR cameras and minor engineering works on the streets	School received temporary pavement widening measures or highways management measures planned in response to COVID. Measures will be converted to be long term.	£200,000.00		1 year	LIP/ capital/ other sources	Funded

School name	Design Approach (permanent closure, ANPR, pavement widening, timed closure?)	Brief description	Cost Estimate	Feasibility	Delivery period	Funding	Funding Status as of October 2021
Campsbourne Primary School	ANPR cameras and minor engineering works on the streets	School received temporary pavement widening measures or highways management measures planned in response to COVID. Measures will be converted to be long term.	£200,000.00		1 year	LIP/ capital/ other sources	Funded
Harris Academy Coleraine Park	ANPR cameras and minor engineering works on the streets	School received temporary pavement widening measures or highways management measures planned in response to COVID. Measures will be converted to be long term.	£120,000.00		1 year	LIP/ capital/ other sources	Funded
Rokesly Primary School	ANPR cameras and minor engineering works on the streets	School received temporary pavement widening measures or highways management measures planned in response to COVID. Measures will be converted to be long term.	£200,000.00		1 year	LIP/ capital/ other sources	Funded
The Highgate Junior School (independent school)	ANPR cameras and minor engineering works on the streets	School received temporary pavement widening measures or highways management measures planned in response to COVID. Measures will be converted to be long term.	£180,000.00		1 year	LIP/ capital/ other sources	Funded
Bruce Grove Primary School	ANPR cameras and minor engineering works on the streets	School received temporary pavement widening measures or highways management measures planned in response to COVID. Measures will be converted to be long term.	£200,000.00		1 year	LIP/ capital/ other sources	Funded
Harris Academy Tottenham	ANPR cameras and minor engineering works on the streets	School received temporary pavement widening measures or highways management measures planned in response to COVID. Measures will be converted to be long term.	£80,000.00		1 year	LIP/ capital/ other sources	Funded
Highgate Primary School	ANPR cameras and minor engineering works on the streets	School received temporary pavement widening measures or highways management measures planned in response to COVID. Measures will be converted to be long term.	£200,000.00		1 year	LIP/ capital/ other sources	Funded
Belmont Junior School (two schools on one site)	ANPR cameras and minor engineering works on the streets	Batch 2 of improvements (to be reviewed, confirmed and determined once Batch 1 is completed)	£200,000.00		1 year	LIP/ capital	Funded

School name	Design Approach (permanent closure, ANPR, pavement widening, timed closure?)	Brief description	Cost Estimate	Feasibility	Delivery period	Funding	Funding Status as of October 2021
Earlham Primary School	ANPR cameras and minor engineering works on the streets	Batch 2 of improvements (to be reviewed, confirmed and determined once Batch 1 is completed)	£120,000.00		1 year	LIP/ capital	Funded
Noel Park Primary School – this will be funded and delivered as part of the Wood Green Good Growth Fund	ANPR cameras and minor engineering works on the streets	Batch 2 of improvements (to be reviewed, confirmed and determined once Batch 1 is completed)	£200,000.00		2-3 years	LIP/ capital	Unfunded
North Harringay Primary School	ANPR cameras and minor engineering works on the streets	Batch 2 of improvements (to be reviewed, confirmed and determined once Batch 1 is completed)	£200,000.00		2-3 years	LIP/ capital	Unfunded
Seven Sisters Primary School	ANPR cameras and minor engineering works on the streets	Batch 2 of improvements (to be reviewed, confirmed and determined once Batch 1 is completed)	£200,000.00		2-3 years	LIP/ capital	Unfunded
South Harringay Primary School	ANPR cameras and minor engineering works on the streets	Batch 2 of improvements (to be reviewed, confirmed and determined once Batch 1 is completed)	£200,000.00		2-3 years	LIP/ capital	Unfunded
Coleridge Primary School	ANPR cameras and minor engineering works on the streets	Batch 2 of improvements (to be reviewed, confirmed and determined once Batch 1 is completed)	£200,000.00	Green	1 year	LIP/ capital	Funded
Stroud Green Primary School	ANPR cameras and minor engineering works on the streets	Batch 2 of improvements (to be reviewed, confirmed and determined once Batch 1 is completed)	£200,000.00		2-3 years	LIP/ capital	Unfunded
The Mulberry Primary School	ANPR cameras and minor engineering works on the streets	Batch 2 of improvements (to be reviewed, confirmed and determined once Batch 1 is completed)	£200,000.00	Green	1 year	LIP/ capital	Funded
The Willows & The Brook Inclusive Learning Campus	ANPR cameras and minor engineering works on the streets	Batch 2 of improvements (to be reviewed, confirmed and determined once Batch 1 is completed)	£200,000.00		2-3 years	LIP/ capital	Unfunded
Hyland House School	ANPR cameras and minor engineering works on the streets	Batch 2 of improvements (to be reviewed, confirmed and determined once Batch 1 is completed)	£200,000.00		3-4 years	LIP/ capital	Unfunded

School name	Design Approach (permanent closure, ANPR, pavement widening, timed closure?)	Brief description	Cost Estimate	Feasibility	Delivery period	Funding	Funding Status as of October 2021
Lea Valley Primary School	ANPR cameras and minor engineering works on the streets	Batch 2 of improvements (to be reviewed, confirmed and determined once Batch 1 is completed)	£200,000.00		3-4 years	LIP/ capital	Unfunded
Rhodes Avenue Primary School	ANPR cameras and minor engineering works on the streets	Batch 2 of improvements (to be reviewed, confirmed and determined once Batch 1 is completed)	£200,000.00		3-4 years	LIP/ capital	Unfunded
St John Vianney Roman Catholic Primary School	ANPR cameras and minor engineering works on the streets	Batch 2 of improvements (to be reviewed, confirmed and determined once Batch 1 is completed)	£200,000.00		3-4 years	LIP/ capital	Unfunded
St Martin of Porres Roman Catholic Primary School	ANPR cameras and minor engineering works on the streets	Batch 2 of improvements (to be reviewed, confirmed and determined once Batch 1 is completed)	£200,000.00	Green	1 year	LIP/ capital	Funded
St Marys Primary School N15	ANPR cameras and minor engineering works on the streets	Batch 2 of improvements (to be reviewed, confirmed and determined once Batch 1 is completed)	£200,000.00		3-4 years	LIP/ capital	Unfunded
St Pauls and All Hallows Church of England Federation	ANPR cameras and minor engineering works on the streets	Batch 2 of improvements (to be reviewed, confirmed and determined once Batch 1 is completed)	£200,000.00		3-4 years	LIP/ capital	Unfunded
Weston Park Primary School	ANPR cameras and minor engineering works on the streets	Batch 2 of improvements (to be reviewed, confirmed and determined once Batch 1 is completed)	£200,000.00		3-4 years	LIP/ capital	Unfunded
Brook House Primary School	School street measures	Pavement widening, improved crossings, enforcement of School Keep Clear areas and new cycle racks	£200,000.00		2-3 years	LIP/ capital	Unfunded
Bounds Green Primary School	School street measures	Pavement widening, improved crossings, enforcement of School Keep Clear areas and new cycle racks	£80,000.00		2-3 years	LIP/ capital	Unfunded
Devonshire Hill Primary School	ANPR cameras and minor engineering works on the streets / School street measures	Pavement widening, improved crossings, enforcement of School Keep Clear areas and new cycle racks	£80,000.00		2-3 years	LIP/ capital	Unfunded

School name	Design Approach (permanent closure, ANPR, pavement widening, timed closure?)	Brief description	Cost Estimate	Feasibility	Delivery period	Funding	Funding Status as of October 2021
Eden Primary School	School street measures	Pavement widening, improved crossings, enforcement of School Keep Clear areas and new cycle racks	£80,000.00		2-3 years	LIP/ capital	Unfunded
Harris Primary Academy Philip Lane	Existing temporary pavement widening to be made permanent	Pavement widening, improved crossings, enforcement of School Keep Clear areas and new cycle racks	£80,000.00		2-3 years	LIP/ capital	Unfunded
Risley Avenue Primary School	Existing temporary pavement widening to be made permanent	Pavement widening, improved crossings, enforcement of School Keep Clear areas and new cycle racks	£80,000.00		1-2 years	LIP/ capital	Unfunded
St. Gilda's Junior School	School street measures	Pavement widening, improved crossings, enforcement of School Keep Clear areas and new cycle racks	£80,000.00		1-2 years	LIP/ capital	Unfunded
St Michael's Church of England Primary School (N6)	School street measures	Pavement widening, improved crossings, enforcement of School Keep Clear areas and new cycle racks	£80,000.00		3-4 years	LIP/ capital	Unfunded
St Peter in Chains RC Infant School	School street measures	Pavement widening, improved crossings, enforcement of School Keep Clear areas and new cycle racks	£80,000.00		3-4 years	LIP/ capital	Unfunded
Trinity Primary School N22	ANPR cameras and minor engineering works on the streets / School street measures	Pavement widening, improved crossings, enforcement of School Keep Clear areas and new cycle racks	£80,000.00	Green	1 year	LIP/ capital	Funded
St Michael's Church of England Primary School (N22)	School street measures	Pavement widening, improved crossings, enforcement of School Keep Clear areas and new cycle racks	£80,000.00		3-4 years	LIP/ capital	Unfunded
Our Lady of Muswell Roman Catholic Primary School	School street measures	Pavement widening, improved crossings, enforcement of School Keep Clear areas and new cycle racks	£80,000.00		3-4 years	LIP/ capital	Unfunded

School name	Design Approach (permanent closure, ANPR, pavement widening, timed closure?)	Brief description	Cost Estimate	Feasibility	Delivery period	Funding	Funding Status as of October 2021
Ferry Lane Primary School	Not suitable for school streets at this time	Not suitable for school streets at this time	£0.00		N/A	N/A	
Muswell Hill Primary School							
St Aidan's VC Primary School							
St Ignatius Roman Catholic Primary School							
St James Church of England Primary School							
Tetherdown Primary School							
The Grove School							
		TOTAL	**£7,700,000.00**				

Project Name	Project theme (walking, cycling, vision zero, motorcycling travel planning etc)	Description	Cost Estimate	Feasibility	Delivery period	Funding (source and commitment) (LIP etc)	Funding Status as of January 2021 (this status is subject to change following public consultation on this Action Plan)
Cycle Training	Cycling	Cycle training across the community	£80,000.00		Annually	LIP	Funded
Cycling Active Travel and Health	Cycling	Cycle initiatives across the Community - bike hire, infrastructure etc.	£60,000.00		Annually	LIP	Funded
Road safety	Road Safety	Pedestrian training, road safety audits and educational guidance.	£70,000.00		Annually	LIP	Funded
Improving air quality, reducing CO2, traffic and congestion campaign	Air Quality	Anti-idling, signage, monitoring of equipment and pollution levels	£60,000.00		Annually	LIP / Mayors Air Quality Programme / S106	Funded

Project Name	Project theme (walking, cycling, vision zero, motorcycling travel planning etc)	Description	Cost Estimate	Feasibility	Delivery period	Funding (source and commitment) (LIP etc)	Funding Status as of January 2021 (this status is subject to change following public consultation on this Action Plan)
School Streets	School Safety	The delivery and education around School Streets across the borough	(see School Streets programme)		Annually	Council Capital / LIP / SCIL	Funded
STARS	School Safety	To promote active travel with all the boroughs schools and deliver supporting infrastructure.	£80,000.00		Annually	LIP	Funded
		TOTAL	£350,000.00				

Cycle Parking

Project Name	Scheme overview	Cost Estimate	Feasibility	Delivery period	Funding	Funding Status as of October 2021 (this status is subject to change following public consultation on this Action Plan)
Residential cycle parking	Cycle hangers	£200,000.00		Annually for 3 years	LIP/SCIL	Funded
Highways cycle parking	Sheffield stands	£30,000.00		Annually for 3 years	TBC LIP/ capital/ S106	Funded
Homes for Haringey cycling project	Cycle hangers or cycle sheds	£40,000.00		Annually	TBC revenue Homes for Haringey	TBC
Cycle hubs at transport interchanges	Cycle hubs - feasibility review	£50,000.00		1-2 years	LIP/ capital	Unfunded
	TOTAL	£210,000.00				

Active Travel Projects

Project Name	Project theme (walking, cycling, vision zero, motorcycling travel planning etc)	Description	Cost Estimate	Feasibility	Delivery period	Funding (source and commitment) (LIP etc)	Funding Status as of October 2021
Cycle Training	Cycling	Cycle training across the community	£80,000		Annually	TBC LIP	Funded

Project Name	Project theme (walking, cycling, vision zero, motorcycling travel planning etc)	Description	Cost Estimate	Feasibility	Delivery period	Funding (source and commitment) (LIP etc)	Funding Status as of October 2021
Cycling Active Travel and Health	Cycling	Cycle initiatives across the Community - bike hire, infrastructure etc.	£60,000		Annually	TBC LIP	Funded
Road safety	Road Safety	Pedestrian training, road safety audits and educational guidance.	£70,000		Annually	TBC LIP	Funded
Improving air quality, reducing CO2, traffic and congestion campaign	Air Quality	Anti-idling, signage, monitoring of equipment and pollution levels	£60,000		Annually	TBC LIP / Mayors Air Quality Programme / S106	Funded
School Streets	School Safety	The delivery and education around School Streets across the borough	(see School Streets programme)		Annually	Council Capital / LIP / SCIL	Funded
STARS	School Safety	To promote active travel with all the boroughs schools and deliver supporting infrastructure.	£80,000		Annually	TBC LIP	Funded
		TOTAL	**£350,000.00**				



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EQUALITY IMPACT ASSESSMENT

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

- Eliminating discrimination, harassment and victimisation and any other conduct prohibited under the Act
- Advancing equality of opportunity for those with 'protected characteristics' and those without them
- Fostering good relations between those with 'protected characteristics' and those without them.

In addition the Council complies with the Marriage (same sex couples) Act 2013.

1. Responsibility for the Equality Impact Assessment	
Name of proposal	Walking and Cycling Action Plan
Service area	Planning, Building Standards & Sustainability
Officer completing assessment	Maurice Richards and Neil Goldberg
Equalities/ HR Advisor	Joe Wills
Cabinet meeting date (if applicable)	8 March 2022
Assistant Director	Rob Krzyszowski

2. Summary of the proposal

Producing a Haringey Walking and Cycling Action Plan (WCAP) is a council commitment in the adopted 2018 Transport Strategy. The Transport Strategy states:

'This Strategy provides the overarching high-level statement of our ambitions for transport and highlights our key commitments over the next 10 years. The detailed actions of our key programmes and proposals are set out in a series of associated 'action plans' which will outline how the ambitions will be achieved. The proposed Action Plans which will follow the adoption of this strategy are:

- *Walking and Cycling Action Plan,*
- *Parking Action Plan,*
- *Sustainable Transport and Travel Action Plan; and*
- *The Local Implementation Plan.*

These Plans will outline actions and set targets to help deliver the Outcomes listed in Section 4 of this Strategy'

The WCAP is a 10-year plan which sets out how the council will deliver the aspirations in the Mayor of London's Transport Strategy (MTS), the 2018 Haringey Transport Strategy, and the government's 2020 Cycling and Walking Plan. The plan will enable more walking and cycling in the borough and fulfil the council's ambitions to have a reputation for being a walking and cycling borough both regionally and nationally. The WCAP will better enable the council to bid for funding from TfL, the DfT and other sources to help deliver its priorities.

The vision for the WCAP is by 2031 we want:

- a reputation for being one of the best walking and cycling boroughs, both regionally and nationally

- walking and cycling are natural choices
- active travel to have improved the wellbeing of our residents, reducing obesity and improving air quality
- to reduce motor vehicle use for short trips with a shift to active travel.

Underpinning the WCAP are 5 key policies. These policies are titled:

1. Increasing active travel
2. People walking
3. People cycling
4. Delivering Low Traffic Neighbourhoods
5. Re-allocating road space to enable sustainable growth and to make walking and cycling safer

The WCAP identifies future transport schemes, their deliverability and cost, whether funding has been allocated for it and/or possible future sources of funding. The Wood Green and Tottenham regeneration areas have a greater focus to ensure the planned development and growth occurring in these areas is supported by a sustainable transport system which reduces car use in favour of walking and cycling. For the purpose of this EqIA, we focus on the policies and vision rather than the individual schemes. Any impacts of the schemes are assessed on a scheme by scheme basis, in accordance with our duties as the Highways Authority.

Equality Impact Assessments (EqIAs) were carried out for the 2018 Transport Strategy and the 2019-2022 Local Implementation Plan. As this WCAP is the driver for delivering these two documents, their EqIAs should be read alongside this EqIA. The EqIAs can be found here:

https://www.haringey.gov.uk/parking-roads-and-travel/travel/transport-strategy/haringey-local-implementation-plan-2019-2022-consultation, and

https://www.haringey.gov.uk/parking-roads-and-travel/travel/haringeys-transport-strategy

The main stakeholders who may be affected by the strategy are the general public, transport providers, community and amenity groups and statutory bodies.

3. What data will you use to inform your assessment of the impact of the proposal on protected groups of service users and/or staff?

Identify the main sources of evidence, both quantitative and qualitative, that supports your analysis. Please include any gaps and how you will address these

This could include, for example, data on the Council's workforce, equalities profile of service users, recent surveys, research, results of relevant consultations, Haringey Borough Profile, Haringey Joint Strategic Needs Assessment and any other sources of relevant information, local, regional or national. For restructures, please complete the restructure EqIA which is available on the HR pages.

Protected group	Service users	Staff
Sex	Haringey JSNA, 2011 Census ONS data, State of the Borough report December 2021	N/A
Gender Reassignment	No national or local collected data	N/A
Age	Haringey JSNA, 2011 Census ONS data, State of the Borough report December 2021	N/A

Disability	Haringey JSNA, 2011 Census ONS data, State of the Borough report December 2021	N/A
Race & Ethnicity	Haringey JSNA, 2011 Census ONS data, State of the Borough report December 2021	N/A
Sexual Orientation	ONS integrated household survey	N/A
Religion or Belief (or No Belief)	Haringey JSNA, 2011 Census ONS data, State of the Borough report December 2021	N/A
Pregnancy & Maternity	Haringey JSNA, 2011 Census ONS data, State of the Borough report December 2021	N/A
Marriage and Civil Partnership	2011 Census	N/A

Outline the key findings of your data analysis. Which groups are disproportionately affected by the proposal? How does this compare with the impact on wider service users and/or the borough's demographic profile? Have any inequalities been identified?

Socio-economic

Haringey is ranked 49th out of the 317 local authorities in England with respect to deprivation, and is the 4th most deprived borough in London, with deprivation more concentrated in the north east. Relative deprivation has reduced since 2015, though Haringey's London ranking has not shifted significantly.

Of all Inner London boroughs, Haringey has the second largest proportion that are earning below the London Living wage (29%). Haringey also has a higher than average number and rate of children living in all out-of-work benefit claimant households compared to London, though this is not among the highest levels in London. Children in the east of the borough are substantially more likely to be affected by income deprivation than those in the west. 'Transport poverty' is therefore a likely reality for many residents in Haringey on low incomes, meaning some households are likely to struggle with the cost of car ownership and public transport.

Sex

The borough has a relatively equal gender split – males 50.7% to females 49.3%. Haringey's men to women ratio is in line with the rest of London.

In London, the key demographic differences between women and men are employment status and household income. Women are also more likely to be the primary carer of children at home including accompanying younger children to school. Both factors influence the travel behaviour of women in London. In transport terms, women make a greater number of journeys per weekday than men. Trips made by women tend to be shorter according to Transport for London data[1].

Walking is the most commonly used type of transport by women (95% walk at least once a week).

[1] Travel in London: Understanding our Diverse Communities http://content.tfl.gov.uk/travel-in-london-understanding-our-diverse-communities-2019.pdf

Women are more likely to use buses than men (62% compared with 56%), but are less likely to use other types of transport including the Tube (38% women compared with 43% men)

Women are less likely than men to drive at least once a week (33% compared with 42%). However, they are more likely to be a car passenger (51% compared with 37% of men)

Women are more likely than men to be travelling with buggies and/or shopping, and this can affect transport choices.

Women are more likely than men to experience worrying incidents when travelling on public transport and are more likely to be deterred from using public transport more often by a number of different barriers including harassment[2]

14% of women report experiencing some form of unwanted sexual behaviour while travelling in London in the previous year (the equivalent figure for men is 6%). Furthermore, 41% of women who experienced an incident of unwanted sexual behaviour did not report it because they felt it was not serious enough.

A higher proportion of journeys made by women are for shopping/personal business than men (25% compared with 18%)

Women are less likely than men to be employed full or part-time, and this is reflected in the smaller proportion of journeys that are made for work purposes (25% compared with 38%)

79% of women in London report being able to ride a bike, compared with 91% of males. Research[3] by CyclingUK found that men do nearly three times as many cycling journeys as women, and travel more than four times as far. TfL's 2016 Attitudes to Cycle report[4] found that 'regular cyclists are more likely to be men, white, working and non-disabled – 20% of men report being 'regular' cyclists compared with 8% of women'. A research report by Sustrans titled 'Women, reducing the gender gap'[5] found that most women don't feel safe and are hesitant to start cycling, Women reported that they feel intimidated on the roads and its hard to take their place. There are issues with safety travelling on public transport and other active travel modes.

Research[6] from TfL states that the school run accounts for around a quarter of a million car journeys every morning in London. Women are more likely to be the primary carers to children and therefore it can be reasonably assumed they are more likely to take and collect children from school.

Gender Reassignment

Census date is not available for gender reassignment. The Council do not hold data on the number of people who are seeking, receiving or have received gender reassignment surgery. The Equality and Human Rights Commission estimate that there is between 300,000-500,000 transgender people in the UK[7].

Age - Children

Haringey has a relatively young population. It has a higher proportion of 20-44 year olds than London (46.4% and 34.2% respectively) and a lower proportion of pensioners (65+) than London

[2] Most women have been harassed on public transport https://yougov.co.uk/topics/legal/articles-reports/2020/01/22/most-women-have-been-sexually-harassed-london-publ
[3] *https://www.cyclinguk.org/article/campaigns-guide/women-cycling*
[4] *https://tfl.gov.uk/corporate/publications-and-reports/cycling-and-walking*
[5] *https://www.sustrans.org.uk/our-blog/opinion/2019/january/how-can-we-challenge-the-cycling-gender-gap*
[6] *https://www.london.gov.uk/what-we-do/transport/cycling-and-walking/making-walking-count*
[7] *https://www.equalityhumanrights.com/en/trans-inequalities-reviewed/introduction-review*

(8.7% and 16.6% respectively). Haringey has a similar proportion of 0-19 years olds as London (24.9% and 23.9% respectively).

Children and more concentrated in wards in the east of the borough where deprivation is highest. Over 1 in 3 children in Haringey live in poverty.

More 11-17 year olds walk to school in Haringey than in any other London borough (64% mode share).

In Haringey, 3.3 times more primary school children walk to school than are driven to school. Walking is the most commonly used mode of transport by younger Londoners (97% of those aged 24 and under walk at least once a week compared with 95% all Londoners)

Research by TfL [8] suggests that only 28% of children cycle to school 'regularly', with 62% of children having access to a bike.

Childhood obesity remains a problem in Haringey. In Haringey in 2019/20, 17% of all Reception year students and 35.3% of all Year 6 students were recorded as overweight or obese.

Age – Older People

There were 29,222 people over 65 living in Haringey in 2021. This population is expected to see the most significant growth of any age group over the next ten years, growing by 29% to 36,972 residents in 2030.

Walking is the most frequently used type of transport by older Londoners aged 65 and over (87% walk at least once a week). 65% travel by bus, 43% drive a car at least once a week and 41% travel by car as a passenger at least once a week

The frequency of ill health rises with increasing age. Older people are particularly vulnerable to cardiovascular disease, diabetes, depression, dementia and falls which correlates with a rapid drop in cycle use frequency after the age of 60. The propensity for social exclusion among older people in Haringey is high, with the borough ranking 8th highest of all London boroughs.

A major concern often linked to social exclusion is mobility. Older people are often concerned about footway condition and lighting which can reduce their confidence for leaving the house. Older people also rely more on car-based door-to-door travel provision, including dial a ride, community transport and hospital transport.

Difficulties cycling increase with age. In the UK, cyclists aged over 60 are in the minority but numbers are increasing. Most older cyclists are likely to cycle for leisure, often choosing quieter routes away from busy roads.

People of young and old age are more vulnerable to poor air quality

Disability

More than 19,500 people in Haringey have a physical disability; this equates to approximately 10% of the population aged 16-64. 4,500 people have a serious physical disability in Haringey, almost 5,000 people have sight loss which impacts upon daily living and around 15,700 adults have a moderate or severe hearing impairment.

[8] *https://tfl.gov.uk/corporate/publications-and-reports/cycling-and-walking*

Disabled people face significant barriers to walking and cycling. The most common physical barrier to walking is crossing the road. Having enough time to cross, not finding a safe place to cross the road, signalised crossings that do not work, are all barriers. Obstructions, advertising boards, wheelie bins and parked cars, are commonly encountered and make walking difficult. The most common barriers to cycling among disabled people are lack of appropriate equipment, low availability of safe cycling infrastructure and lack of confidence and support.

Race and Ethnicity

67.1% of the Haringey population are from a Black, Asian and minority ethnic groups or Other White ethnic groups compared to 60.7% in London. Around 16.5% of residents in Haringey are from Black ethnic groups and one in ten are Asian (10.3%).

Over 180 languages are spoken by Haringey residents. 30% of Haringey residents do not speak English as their main language. This is the 6th highest rate in London and is above the statistical neighbour and London averages. Of those whose main language is not English in Haringey, one in four (24%) either do not speak English well or do not speak it at all. This is the third largest proportion of all London boroughs, and is above the statistical neighbour and London levels as reported in Haringey State of the Borough report .

Non-White British communities are concentrated in deprived areas of the borough and, it can be reasonably assumed, are more likely to face transport poverty.

Many recently arrived migrants are also protected under this characteristic as well as experiencing some of the other protected characteristics in this EqIA

The Mayor of London's 'Vision for Cycling' 2013[9] revealed that similar numbers of people from white, black and mixed ethnic groups cycle regularly, whilst people from an Asian background cycle less. However, people of Black and Asian ethnicity are more likely to never cycle at all compared to all other ethnic groups.

Studies have found big differences in air pollution across communities in England, with deprived and ethnic minority areas the worst affected. The worst air pollution levels were seen in ethnically diverse neighbourhoods, defined as those where more than 20 per cent of the population are non-white

Sexual Orientation

The ONS estimates[10] suggest 4% of Haringey residents are gay or lesbian; this is slightly above the London average of 3.1%. This means Haringey has the 6th largest gay and lesbian population of all London boroughs, and the 9th largest of all local authorities in the country. There are issues with safety travelling on public transport and other active travel modes.

Religion or Belief

The proportion of Haringey residents saying they are Christian (45%) is in line with statistical neighbour boroughs (46%), and is slightly below London (48%), while Haringey residents are more likely to identify as having no religion (25% compared to 21% among both statistical neighbours and London).

The next most common religions after Christianity are Islam (14.3%) – higher than the London average (12.3%) - and Judaism (3%) – higher than England & Wales. Haringey has a lower

[9] *www.london.gov.uk/what-we-do/transport/cycling-and-walking/mayors-vision-cycling*

[10] *ONS Annual Population Survey, 2013-15*

percentage of residents who are Hindu (1.8%) and Sikh (0.3%) than London (5.0% and 1.5%, respectively).

It is unknown whether cultural issues in some faith groups may prevent people taking up active travel. We do know that 'home and family responsibilities' and 'work and study commitments' are barriers to participation for some faith groups. Religious commitments can leave little time for sporting activities, for example attending religious institutions for study and worship[11].

Pregnancy and Maternity

The number of births in Haringey in 2017 were 3,881. This equates to approximately 3% of number of births in London in the same year. Fertility rates in Haringey are marginally lower than those for Greater London.

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. This characteristic is only applicable in contexts where the scheme relates to employment.

Parents/carers

The Equality Act does not treat being a parent or carer as a protected characteristic, however it is noted that parents and carers can often face discrimination by virtue of a range of factors. For instance, women tend to bear the primary responsibility of childcare. This means that women and men can experience sex discrimination related to their caring responsibilities. A carer is anyone who cares, unpaid, for a friend or family member who due to illness, disability, a mental health problem or an addiction cannot cope without their support. Another example is disability discrimination where a person may require care in order to support normal day-to-day activities

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?

The Communications and Engagement undertaken to support the WCAP aligns with the Council's obligations under the Equality Act 2010.

In addition to engagement as the Council prepared the Draft WCAP, the Council carried out a formal public consultation on the Draft WCAP. The methodology was designed to reach a wide range of public and stakeholders, including those with protected characteristics (as defined by the 2010 Equality Act), and to encourage them to participate in the consultation process The plan also included measures to ensure those who are typically seldom heard in these processes were able to provide their feedback

The Council made use of the extensive stakeholder list it has built up via previous engagement on transport matters including the three emerging LTNs in Bounds Green, Bruce Grove West Green and St Ann's. Full details of the consultation approach and the responses received are provided in a Consultation Report.

[11] *Policy Analysis Research Summary, November 2011 'What are the barriers to cycling amongst ethnic minority groups and people from deprived backgrounds?'*

The Council is in ongoing dialogue with a range of key stakeholder groups, for example in relation to the development of a borough-wide LTN Exemptions Policy.

Schemes set out for delivery in the WCAP will be subject to separate EqIAs as and when they come forward over the next ten years.

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

The topic of equality was raised frequently by participants through the public consultation on the Draft WCAP. This included suggestions that greater recognition and consideration should be given to those who are less able to walk and/or cycle, such as the disabled or elderly and those with young children. It was noted that active travel is not accessible to everyone and that some people are necessarily more reliant on motor cars

However, on the whole there was support for the policies and proposals in the Draft WCAP to enable more journeys to be made by walking and cyclin. This is consistent with the response to consultation on the Transport Strategy which confirmed that residents broadly supported the policy shift towards more sustainable modes of transport as a means of cutting congestion, reducing the reliance on the private car, tackling air quality, and addressing public health and well-being. The consultation summary of the Transport Strategy can be found here: https://www.haringey.gov.uk/parking-roads-and-travel/travel/haringeys-transport-strategy

5. What is the likely impact of the proposal on groups of service users and/or staff that share the protected characteristics?

1. **Sex**

Walking is the most commonly used type of transport by women. By enable more and better walking experiences the WCAP will benefit women.

A research report by Sustrans titled ‘Women, reducing the gender gap’ found that most women don’t feel safe and are hesitant to start cycling. Creating more favourable cycling conditions (providing safety and helping eliminate discrimination) is likely to support an uptake of cycling by women.

Women are more likely to use the bus than men. As many public transport journeys start or end on foot or cycle, improvements in safety and convenience to these networks will improve their access to public transport services.

The prioritisation of walking and cycling over private car use, may negatively impact women. However, women will also benefit from safer and healthier streets and improved air quality.

Women are more likely to take children to and from educational and recreational facilities and be carers. Those who can walk to local schools would benefit from the safer environment the

schemes will offer. Women who rely on a car as transportation to any further special schools or to provide care may have their journeys altered by LTNs..

The introduction of a Low Traffic Neighbourhood in Waltham Forest was associated with a decrease in total street crime and antisocial behaviour. This effect increased over time, with an even larger reduction observed for violent and sexual offences. The causative factors are not assessed in detail, yet any proposals that can help keep any threats or likelihood of sexual offences against women at a minimum is a benefit. Women tend to share taxi services late at night to get home safely. LTNs could create a barrier for this to be done efficiently as it may increase travel times and cost between drop-offs.

Overall, the air quality, safety, health and mode shift benefits are considered to outweigh the inconvenience caused by changes to vehicle journeys to this protected characteristic. Monitoring and further engagement will take place as future schemes come forward.

Positive	X	Negative	X	Neutral impact		Unknown Impact	

2. Gender reassignment

There is no data to suggest that the WCAP will have a differential impact on people undergoing or who have undergone gender reassignment.

Positive		Negative		Neutral impact		Unknown Impact	X

3. Age

Walking is the most commonly used mode of transport by younger Londoners with a high proportion of children walking to school. Children will experience positive benefits as a result of safer and healthier streets and the improved air quality the WCAP will help deliver. Young people would be encouraged to walk and cycle (or scoot) to school, which would help to improve the current child excess weight statistics in the neighbourhood area. The same benefits will accrue to older people, including the elderly. Walking is the most frequently used type of transport by older Londoners aged 65 therefore benefits are expected to be widespread. The WCAP will help protect older people from socila exclusion they experience as a result of reduced mobility .

Opportunities for cycle training will enable more people to feel confident about cycling and will result in more participation. Older people who choose to cycle will enable them to stay fit which could improve current or future health conditions.

People of young and old age are more vulnerable to poor air quality. Tackling air quality via LTNs would contribute to increased healthy life expectancy and reducing early death from cardio-respiratory diseases, which would benefit all ages, in particular those more vulnerable such as elderly people or those with poor health.

Older people are more likely to be dependent on cars for travel, rather than walking and cycling particularly as they are more likely to have a disability. They have potential to be disproportionately impacted by the roll out of LTNs. The WCAP is not seeking to eliminate car use and all addresses in LTNs will remain accessible by motor car or van, although some routes may change and journey times could increase or decrease. The Council is developing an LTN Exemption Policy to help ensure equalities are increased as far as possible as part of the delivery of LTNs.

Overall, the air quality, safety, health and mode shift benefits are considered to outweigh the inconvenience caused by changes to vehicle journeys to this protected characteristic, especially having regard to the forthcoming LTN Exemptions Policy.

Positive	X	Negative	X	Neutral impact		Unknown Impact	

4. Disability

It is note that this protected characteristic includes a wide variety of individuals and groups for whom needs and requirements vary substantially.

People with disabilities face significant barriers to walking and cycling. By helping address the barriers, and enabling increased active travel people with disabilities, the WCAP will deliver a range of benefits including to health, well-being, as well as to overall mobility and ability to access services and facilities. The WCAP specifically recognises the needs of mobility impaired users of all transport modes.

At the same time, it is recognised that not all individuals or groups will be able to walk or cycle and disabled people are therefore more likely to be dependent on cars. They may be negatively impacted by the WCAP's reallocation of road space and LTN proposals. The WCAP is not seeking to eliminate car use and all addresses in LTNs will remain accessible by motor car or van, although some routes may change and journey times could increase or decrease. The Council is developing an LTN Exemption Policy to help ensure equalities are increased as far as possible as part of the delivery of LTNs. This includes exemptions to support Badge Holders and is being prepared in consultation with disabled individuals and representative stakeholder groups.

Positive	X	Negative	X	Neutral impact		Unknown Impact	

5. Race and ethnicity

People from a Black and Minority Ethnic background are more likely to be impacted by transport poverty and will benefit from safer and healthier streets, improved health from being enabled to take up active travel options and from improved air quality

There are differences in the level of cycling between racial and ethnic groups. By tackling the range of barriers faced the WCAP has potential to increase cycling levels across the breadth of Haringey's communities.

By improving the safety of walking and cycling routes this could reduce violence or victimisation based on race and ethnicity. Evidence from the Waltham Forest report shows a decline in anti-social behaviour as a result of LTNs which could aso have positive effects for this group.

Deprived and ethnically diverse neighbourhoods were found to have the worse air pollution levels. Tackling air quality through LTNs and mode shift would contribute to increasing healthy life expectancy and reducing early death from cardio-respiratory diseases in this protected group.

Positive	X	Negative		Neutral impact		Unknown Impact	

6. Sexual orientation

There is no data to suggest that the WCAP will have a differential impact on sexual orientation.

Positive		Negative		Neutral impact	X	Unknown Impact	

7.Religion or belief (or no belief)

Improving conditions for walking and cycling is likely to positively benefit those who follow a religion and attend a local place of worship. Destinations such as this are generally used by local community.

Religious commitments can sometimes leave little time for sporting activities, for example, as young Asian Muslims attend mosque after school, they do not have much leisure time as those from non-religious backgrounds.. Therefore, creating environments that enable and encourage people to cycle more often can lead to exercise being built into their day, rather than them having to go out of their way to achieve it.

Positive	X	Negative		Neutral impact		Unknown Impact	

8. Pregnancy and maternity

LTNs may negatively impact on parents/carers or those who are pregnant, or who have infants and/or young children and find it more difficult to walk or cycle, and therefore may prefer the use of door-to-door transport services such as private cars or taxis. Expectant mothers and mothers who have recently given birth may also have increased numbers of medical appointments that they prefer to make using a vehicle.

At the same time, there are many parents who travel with their children either using a toddler bike seat, cargo bike or bikes with trailers. These parents will benefit from the proposals.

In general, pregnant woman will benefit from safer and healthier streets, improved health from being enabled to take up active travel options and from improved air quality. Improvements to the walking environment will help women (and men) push buggies in the borough and feel safer to walk around with a baby. Improvements in air quality are likely to benefit infants and children who are more vulnerable to breathing in polluted air than adults due to their airways being in development, their breathing being more rapid than adults as well as the fact that when walking or seating in the pram, they are positioned closer to the direct source of fumes.

Overall, the air quality, health and mode shift benefits are considered to outweigh the inconvenience caused by longer vehicle journeys as a result of LTNs.

Positive	X	Negative	X	Neutral impact		Unknown Impact	

9. Marriage and Civil Partnership

It is anticipated that the impact on people who are in a civil partnership will be the same as for people who are married. Residents will benefit from safer and healthier streets, improved health from being enabled to take up active travel options and from improved air quality. This characteristic is only applicable in contexts where the scheme relates to employment.

Positive	X	Negative		Neutral impact		Unknown Impact	

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

Impact covered within respective EQIA group.

There are no accumulative impacts identified in this WCAP on people who identify with more than one protected characteristic. All residents will benefit from safer and healthier streets, improved health from being enabled to take up active travel options and from improved air quality.

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 WCAP is not considered to result in any direct discrimination for any groups that share the protected characteristics and should advance equality of opportunity by addressing the barriers faced by groups with protected characteristics.

It is noted that LTNs have potential to impact on individuals and groups who are more reliant on motor cars. While all addresses will remain accessible by car, some car journeys may be different or take longer, and thus become less convenient as a result of the proposals.
It is the overall impact of the proposal that is being considered, with many benefits to the users, including those living and working across the borough. In order to achieve the multiple benefits described throughout the report, including contributing to the local Haringey and wider, outer London mode-shift, some car journey impact may be seen. On balance, LTNs are considered to contribute to equality in the borough but to ensure equalities are advanced as far as possible the Council is preparing an LTN Exemptions Policy

The WCAP is considered to have an overall a positive effect on residents in Haringey. Residents will benefit from safer and healthier streets, improved health from being enabled to take up active travel options and from improved air quality.

There are groups protected under the equalities act that generally do not currently cycle in Haringey or walk as a consequence of safety and pollution fears. The WCAP aims to enable more cycle trips to be made by all groups, providing cycle training and making bicycles more accessible and challenging perceptions on cycling.

6. a) What changes if any do you plan to make to your proposal as a result of the Equality Impact Assessment?	
Outcome	Y/N
No major change to the proposal: the EqIA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken.	Y
Adjust the proposal: the EqIA identifies potential problems or missed opportunities. Adjust the proposal to remove barriers or better promote equality.	N
Stop and remove the proposal: the proposal shows actual or potential avoidable adverse impacts on different protected characteristics. The decision maker must not make this decision.	N

6 b) Summarise the specific actions you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty

Impact and which protected characteristics are impacted?	Action	Lead officer	Timescale
LTN Exemptions Policy	A borough-wide LTN Exemption Policy is being prepared to ensure the roll out of LTNs in Haringey advances equalities as far as possible.	Maurice Richards, Transport Planning Team Manager	Summer 2020

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.

Some car journeys may be different or take longer, and thus become less convenient as a result of the proposals.

It is the overall impact of the proposal that is being considered, with many benefits to the users, including those living and working across the borough. In order to achieve the multiple benefits described throughout the report, some car journey impact may be seen.

6 c) Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented:

The WCAP commits the Council to carrying out extensive monitoring and consultation. Schemes that are brought forward will be subject to appropriate engagement and consultation with residents, ward councillors, representative groups and other stakeholder groups.

7. Authorisation	
EqIA approved by: Bryce Tudball Interim Head of Planning Policy, Transport & Infrastructure	Date: 25/02/2022

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Report for: Cabinet – 8 March 2022

Title: Housing Strategy Consultation

Report Authorised by: David Joyce, Director of Housing, Regeneration and Planning

Lead Officer: Robbie Erbmann, Assistant Director of Housing

Ward(s) affected: All

Report for Key/ Non Key Decision: Key Decision

1. Describe the issue under consideration

1.1. Haringey's current Housing Strategy runs from 2017-2022. A new Housing Strategy therefore needs to be developed.

1.2. A draft Housing Strategy has been prepared: this sets out the Council's direction of travel in housing policy, and its high level objectives. Following a period of engagement and consultation with the residents and key stakeholders in the borough, a final strategy will be prepared for approval at Cabinet, and by Full Council, later in 2022.

2. Cabinet Member Introduction

2.1. I'm delighted to recommend that Cabinet agree a new draft Housing Strategy as the basis for a consultation and wider conversation with our communities. This document proposes our key priorities across the whole housing sector over the next five years. It is based on a careful consideration of evidence, and reflection on the Council's role in ensuring that everyone in Haringey has a safe, stable and affordable home.

2.2. Good housing has a transformative effect on people's lives; and based on the experience of the past few years, we know that the reverse is also true. Making sure that thousands of new homes, including new affordable homes, are built, delivering a new generation of Council homes, improving our existing Council homes, actively ensuring good conditions in the private rented sector, preventing people from becoming homeless and providing support to those who do – these are fundamental ways in which we can improve the lives of a great many of our residents.

2.3. This document is just the beginning. A period of consultation will follow, with targeted work to ensure that we hear from a representative cross-section of our community, including those whose voices are not always heard. Residents' views will lead directly into the final housing strategy, as we continue to strive to ensure that our work is led by our residents and communities.

3. Recommendations

3.1. Cabinet is asked:

3.1.1. To note the Draft Housing Strategy attached at Appendix 1.

3.1.2. To agree to hold a public consultation, alongside other forms of participation and engagement, later in 2022.

3.1.3. To delegate to the Director of Housing, Regeneration and Planning, after consultation with the Cabinet Member for Housing, Placemaking and Development, approval of final consultation documentation.

4. Reasons for decision

4.1. Haringey's current Housing Strategy runs from 2017-2022. A new Housing Strategy therefore needs to be developed.

4.2. As a key policy document for the Council and Borough, the Housing Strategy is subject to statutory consultation. In addition to this statutory requirement, the Council is committed to enabling residents to actively participate in service design and strategy development. Following engagement and consultation, a final Housing Strategy will be developed and presented to Cabinet for approval.

4.3. The Housing Strategy forms part of the Council's Policy Framework. As such, the final Housing Strategy will be presented to Full Council for approval.

5. Alternative options considered

5.1. Not to develop a new Housing Strategy. This was rejected because, even though a Housing Strategy is not a statutory document, it is an important part of the Council's policy framework and sets the direction of travel for housing.

6. Background

6.1. Haringey's current Housing Strategy was adopted in 2016. It runs to 2022.

6.2. Since the current Housing Strategy was adopted, there have been a number of changes at the local, regional and national level, which affect the Council's direction of travel with regard to housing. As well as a new Housing Strategy being necessary due to the expiration of the current strategy, it is also needed to take account of these changes.

6.3. The new draft Housing Strategy is based around four strategic objectives:

- Delivering the new homes Haringey needs
- Improving housing quality and resident services in the social housing sector
- Improving the quality of the private rented sector
- Preventing and alleviating homelessness

6.4. The objectives are underpinned by fundamental principles running through the whole strategy:

- Communication and co-production
- An active Council
- Working holistically and in partnership
- Creating and maintaining sustainable and healthy communities
- Responding to the climate emergency

6.5. This is a draft strategy for consultation. A public consultation will therefore be held later in 2022. Residents' and other stakeholders' views will be recorded and considered, and will inform the final Housing Strategy, which will be presented to Cabinet later in 2022.

6.6. Alongside the statutory consultation, the Council is committed to ensure the active participation of a representative cross-section of residents, and to ensure that groups who are underrepresented in responding to consultations participate. There are many opportunities for residents to shape to detail of objectives and outcomes of the housing strategy, and to co-produce our final vision of what good housing in Haringey looks like, and how we achieve that. A detailed engagement and consultation plan will be developed. Activities are likely to include focused sessions with representative cross-sections of Haringey residents to inform both the final strategy and ongoing resident involvement.

7. Contribution to strategic outcomes

7.1. The Housing Strategy directly contributes to the objectives and outcomes of the Borough Plan, in particular Priority 1: 'a safe, stable and affordable home for everyone, whatever their circumstances'.

8. Statutory Officer Comments (Director of Finance (procurement), Head of Legal and Governance, Equalities)

Finance

8.1. The housing strategy has been updated to include many commitments which have already been agreed, such as the commitments in the Council Borough Plan.

8.2. It has four key strategic objectives as listed in the report and related action plans. These does not include any budgetary commitments over and above those already planned for through the current HRA Business plan.

8.3. The cost of consultation appears to be the only direct financial implications arising from the recommendations in this report and this will be contained within the existing housing commissioning budget.

8.4. However, following consultation and as the proposals are developed, any proposal requiring additional revenue or capital resources will need to be reviewed and approved via the appropriate approval route ahead of implementation.

8.5. There is no financial risk associated with the development of the strategies at this stage.

Legal

8.6. The Head of Legal and Governance has been consulted in the preparation of this report.

8.7. Under section 41 of the Greater London Authority Act 1999, as amended, ("GLAA99"), it is a general duty of the Mayor of London to prepare and publish a London housing strategy. Under section 333D of GLAA99, any local housing strategy prepared by a local housing authority in Greater London must be in general conformity with the Mayor of London's London housing strategy.

8.8. Under section 8 of the Housing Act 1985, local housing authorities (including Haringey Council) shall consider and review on a periodical basis the housing conditions in their area and the housing needs of the area with respect to the provision of further housing accommodation. Section 3 of the Housing Act 2004 further imposes a duty on local housing authorities to keep housing conditions in their area under review.

8.9. Under section 87 of the Local Government Act 2003 (as amended), the Secretary of State for Communities and Local Government has the power to require local housing authorities to have a housing strategy and impose requirements with respect to the ends that the strategy is to be designed to achieve, the formulation of policy for the purposes of the strategy or review of the strategy. The Secretary of State also has the power to order local housing authorities to prepare statement setting out their housing strategy and other material relating to housing. To date, the Secretary of State has not formally exercised these powers. The Explanatory Notes to this Act however describe a local housing authority's Housing Strategy as:

"... the local housing authority's vision for housing in its area. It sets out objectives and targets and policies on how the authority intends to manage and deliver its strategic housing role and provides an overarching framework against which the authority considers and formulates other policies on more specific housing issues."

8.10. The Secretary of State in the 2007 Green Paper "Homes for the future: more affordable, more sustainable" developed the reference to the local housing authority's strategic role as follows:

"The local authority strategic housing role is made up of the strategic decisions and activities associated with effective planning and delivery, in order to meet the housing needs of all residents across all tenures. Strong performance in this role will support effective place shaping and help ensure delivery of the wider sustainable community. This requires vision, leadership, planning and delivery at a strategic level to:

- *assess and plan for the current and future housing needs of the local population across all tenures;*
- *make the best use of the existing housing stock;*
- *plan and facilitate new supply;*
- *plan and commission housing support services which link homes to the support and other services that people need to live in them;*
- *work in partnership to secure effective housing and neighbourhood management on an ongoing basis"*

8.11. Section 225 of the Housing Act 2004 states that “housing” (for the purposes of carrying out the housing needs review required by section 8 of the Housing Act 1985 and for the purposes of preparing a housing strategy under section 87 of the Local Government Act 2003) includes the accommodation needs of gypsies and travellers residing in their area.

8.12. The Public Sector Equalities Duty (“PSED”) set out in section 149 of the Equalities Act 2010 obliges the Council in performing its functions “to have due regard to the need to:

a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;

b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;

c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it”

8.13. The Housing Strategy document itself is not a formal Planning document and consequently will not form part of the statutory Development Plan. While it will be a material consideration, it will not carry significant weight in the development management process.

8.14. The following general principles of consultation apply:

- 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 statutory proposals.

8.15. In short, in order to achieve the necessary degree of fairness, the obligation is to let those who have a potential interest in the subject matter know in clear terms what the proposal is and exactly why it is under positive consideration, telling them enough (which may be a good deal) to enable them to make an intelligent response. The obligation, although it may be quite onerous, goes no further than this.

8.16. Approval of the Housing Strategy following consultation is a function reserved to Full Council by Article 4.01(a) of the Council‟s Constitution.

8.17. There is no legal reason why Cabinet should not adopt the recommendation in this report.

Procurement

8.18. Strategic Procurement notes the report and confirms there are no procurement implications from the proposal

Equalities

8.19. The Housing Strategy is a major strategy which will impact a large number of people in the borough. By seeking to improve conditions in social rented housing, in particular council housing, the strategy will have a positive impact on BAME residents, older residents, and women. By seeking to provide more social housing and in particular more family sized social housing, the strategy will also support these groups, as well as families with young children.

8.20. By prioritising the delivery of rented affordable housing, in particular social rented housing, and therefore not prioritising affordable home ownership, the strategy may have a negative impact on those who aspire to homeownership but are unable to access market housing, who are more likely to be younger. Affordable home ownership will however still be delivered in Haringey.

8.21. People in housing need and those living in social housing are disproportionately disadvantaged across multiple areas and have more than one protected characteristic, in particular in terms of race, socio-economic status, sex and disability. The Housing Strategy prioritises meeting the housing needs of these groups.

8.22. A full analysis is contained in the Draft Equalities Impact Assessment at Appendix 2.

8.23. Following consultation and engagement, a final Equalities Impact Assessment will be prepared to accompany the final Housing Strategy.

9. Use of appendices

Appendix 1: Draft Housing Strategy, 2022-2027
Appendix 2: Draft Equalities Impact Assessment

10. Local Government (Access to Information) Act 1985

Not applicable.

A new housing strategy for Haringey 2022-2027

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Introduction

The right to a home is a fundamental human right. A good quality and secure home allows people to put down roots in a community and access local jobs. It gives children a safe place to play and learn. Good housing contributes to good health, both physical and mental. And well-designed homes create pleasant, secure neighbourhoods that allow residents to belong and thrive.

Covid-19

The experience of living with Covid-19 over the past two years has transformed society in many ways. It has reset our relationships with our homes, as we have spent significant parts of the past few years living, working, learning and playing in one space.

The Covid pandemic has also brought the link between housing and health inequality into sharp relief. There is a clear correlation between higher levels of overcrowding and Covid death rates. Poor housing is linked with poor mental health. The prevalence of asthma is associated with air quality and dampness; overcrowding and cold are associated with physical illnesses including heart disease and hypothermia; and overcrowding increases rates of infectious diseases. This awareness runs through this strategy.

We know that insecure and poor-quality housing has far-reaching impacts on our health and wellbeing – and particularly on children, blighting their health, happiness, and educational opportunities.

The Climate Emergency

The climate emergency means we must transform the way we think of housing. Half our borough's carbon emissions come from our homes: to become a zero-carbon borough, we have to change that. And our homes must be able to cope with the rising temperatures it's now too late to avoid.

Grenfell & safety

The catastrophic fire at Grenfell Tower was a rallying moment for ensuring the safety of all homes in the UK. More locally, the structural defects found in blocks on Broadwater Farm highlighted our commitment to ensuring that all our homes are safe and secure, and showed how seriously we take this. Everyone in Haringey, whether they are social tenants, private tenants, leaseholders or owner-occupiers needs to know that their home is safe.

Housing and inequality

Grenfell also showed the clear link between housing and systemic inequality. Alongside this, we know that Black and minority ethnic communities disproportionately have to endure poor housing conditions, and to be homeless, LGBTQI people are more likely to be rough sleeping, and disabled people are disproportionately living in homes that do not meet their basic needs. Addressing inequality in the UK, and in Haringey, means addressing housing inequality. Our housing strategy is designed to reduce housing inequalities in Haringey.

Our Strategic Objectives

We want everyone in Haringey, whatever their circumstances, to have a safe, stable, and genuinely affordable home. This housing strategy aims to achieve that through four strategic objectives, which are each accompanied by their own sub-objectives:

Strategic objective 1: Delivering the new homes Haringey needs

Strategic objective 2: Improving housing quality and resident services in the social housing sector

Strategic objective 3: Improving the quality of the private rented sector

Strategic objective 4: Preventing and alleviating homelessness

Our fundamental principles

Running through each of these objectives are fundamental principles, which underpin all areas of this strategy.

1. Communication and co-production

We are committed to communicating clearly, transparently and respectfully with our residents. This means that we will use plain English, deliver information in ways that are accessible, and give residents the right amount of notice when we communicate information. We will make sure that we make best use of digital communication – but always remember that this will not always be the best means of having genuine dialogue with all our residents.

It also means that we will make sure that residents can easily get the right information and advice from us, and that they receive this the first time they approach us as often as possible.

Our residents know their borough better than anyone, and they need to be at the centre of the design of services and of homes. So we will work in partnership with residents to deliver new, better, and healthier homes, places and services.

We will always adopt a people-first approach that ensures that our residents, who know the area best, are at the heart of decision-making and shaping the development of their communities. We will also ask our residents to tell us how they would like to participate in decision-making.

2. An active Council

We face significant challenges in housing. But we also have real levers at our disposal: we have regulatory and enforcement powers in the private rented sector, we are a major landlord in the borough, and we use our Housing Revenue Account to build and acquire new homes and improve those we already own.

We are actively committed to centring housing as a core part of the Council's work. This is why we have embarked on a major Council Housing Delivery Programme, are bringing our housing management services back in-house, buy homes in the borough to lease to the Haringey Community Benefit Society and robustly regulate the private rented sector. We will continue to intervene directly and creatively to improve housing in the borough wherever possible.

3. Working holistically and in partnership

Housing is at the heart of what this Council does, but it sits alongside many other important services and areas of work: public health, education, social care, and much more. So when we are implementing our housing strategy, we will make sure that we work in a way that actively and creatively embraces these connections. Bringing our housing management and maintenance, housing allocations and homelessness prevention services back in-house will also allow to better integrate services across the organisation.

We have significant powers, reach, and resources that we will use to improve housing in Haringey. But we cannot do it on our own – and there are times when the Council is not the best organisation to try to respond to a need.

We know we can only achieve the aims of this housing strategy if residents, community groups, voluntary and private sector organisations, and the Council all work together for the benefit of everyone in Haringey. It is possible to make a significant impact on some of society's most complex issues at a local level, but this requires a genuine partnership approach with communities, harnessing ideas, connections, and strengths. We will take a lead role in making that partnership work happen.

4. Creating and maintaining sustainable and healthy communities

We will work with our residents to deliver new, better, and healthier homes and spaces, celebrating and enhancing the places and sense of community that make them proud to call Haringey home. We will work within a localities approach that understands and responds to the unique challenges and opportunities in each of our neighbourhoods. Delivering new housing and improving existing housing means also improving public space so that neighbourhoods are healthier places for everyone to live, work and enjoy with good access to open space, play areas and facilities.

New housing development also helps to build and retain wealth in Haringey's communities. The Council is committed to a community wealth-building approach which builds the prosperity of local people and businesses and supports and enriches Haringey's residents and communities: economically, through employment, and socially, with an emphasis on those who are struggling. New housing development brings significant investment into the borough, and this helps to support the borough's infrastructure, high streets, and town centres, and grows a good economy in Haringey where everyone benefits.

We also know that good quality housing helps people stay in good health. We know that our Council Housing Delivery Programme will deliver wide health benefits to our residents, by ensuring that more people live in well built homes of the right size. Our programme is leading on building homes that are wheelchair accessible and adaptable. We are also taking an innovative approach to designing homes for some of our residents with complex needs, by integrating their needs early in the design process.

5. Responding to the climate emergency

The global climate crisis affects and is affected by every aspect of life. It affects all of us, but it disproportionately affects those least able to bear it and with the least responsibility for causing it. Unless we act now, we face a future of intensifying heat waves, worsening floods, power outages, and growing inequality. Our homes sit at the centre of this crisis: unless we

change the kind of homes in which we live, we will not prevent the worst extremes of climate change - or cope with the changes that are already unavoidable.

The Council's 2021 Climate Change Action Plan responds to this crisis and sets out how the borough will become net zero carbon by 2041. We will all have to make fundamental changes in everything that we do; and this will come at a financial cost.

Our Housing Strategy supports and responds to our Climate Change Action Plan, with commitments across each of its objectives - from retrofitting Council homes, improving energy efficiency in private rented homes, supporting owner-occupiers to make their homes more energy efficient, and addressing fuel poverty, to ensuring that our own and others' new housing developments meet the highest carbon and environmental standards. Responding to the climate emergency will deliver homes that are healthy, comfortable, and affordable places to live, and neighbourhoods that are resilient, greener, and healthier for everybody.

Housing in Haringey

Each chapter of this strategy contains the information and figures which have informed that chapter. This section provides a snapshot of the borough, and its housing.

Haringey's population of 272,400 people is expected to increase by 8,800 people to 281,200 during the five years of this strategy and then to 292,500 by 2032[1].

Haringey has a young, ethnically diverse population. However, the number of people aged over 65 is increasing faster than other age groups.[2]

27 per cent of Haringey's households have dependent children; 32 per cent are people living alone.[3]

4 per cent of Haringey residents are gay or lesbian, the sixth largest gay and lesbian community in London.[4]

10 per cent of Haringey residents have a disability; 4,500 have a serious physical disability.[5]

Measured across a range of indicators, Haringey is among the 10 per cent most deprived council areas in the country and is the sixth most deprived in London. People aged 60 or over are more likely to experience income deprivation in Haringey than in 98 per cent of the country.[6]

Wages in Haringey are lower than the London average[7]. Haringey has approximately 15,000 people who are in receipt of out of work benefits, the third highest level in London when taken as a percentage of its adult population. Unemployment is highest in the east of the borough, with Northumberland Park, Tottenham Green and Tottenham Hale having the highest percentage of people in receipt of out of work benefits. The number of people out of work has decreased since the height of the pandemic, but is still approximately 50 per cent higher than pre-pandemic levels.

Deprivation, like many other characteristics, follows clear geographical lines. Deprivation levels are particularly high in the northeast of the borough: three areas within Northumberland Park and West Green wards are amongst the 5 per cent most deprived LSOAs in England. Northumberland Park is the most deprived ward in London. [8]

In 2018, 15,400 Haringey households – nearly one household in every seven – were living in fuel poverty. This is the second highest level in London. The proportion of households in fuel poverty is highest in the east of the borough - particularly in Noel Park and Bruce Grove.[9]

[1] GLA 2020-based Population Projections, London Datastore
[2] GLA 2020-based Population Projections, London Datastore
[3] 2011 Census
[4] Sexuality of Residents, 2013-15, ONS
[5] 2011 Census
[6] Index of Multiple Deprivation, MHCLG 2019
[7] ONS Annual Survey of Hours and Earnings 2020
[8] Index of Multiple Deprivation, MHCLG 2019
[9] Fuel Poverty by LSOA, Department for Business, Energy and Industrial Strategy

The gap in healthy years of life between richest and poorest groups in Haringey is 15 years for men and 17 years for women.[10]

Six out of every ten Haringey residents live in a flat.[11] Although a quarter of land in Haringey is open space, this varies significantly across the borough. Just two fifths of homes in West Green and Noel Park have good access to green space.[12]

Fewer than 45 per cent of households in Haringey own their own home[13] – and nearly half of those households own their home with no mortgage.[14] Home ownership is highly concentrated in the west of the borough.[15]

London's home ownership rate has fallen in recent decades, but there are stark differences in the trends for different age groups. Homeowners tend to be older.[16]

The median price for a home in Haringey is £563,752 – more than the London average[17]. The median household income in the borough is £35,769 – less than the London average.[18]

Owning a home does not necessarily mean that people have a high income – especially for people who bought their home several decades ago, or more.

More than a third of the Haringey population live in homes rented from a private landlord.[19] This is more than the London average.[20]

More than one in five people in Haringey live in a home rented from a social landlord.[21] 15,000 households rent from the Council [22] and more than 12,000 rent from a housing association.[23]

Over the last ten years, the number of Council homes has decreased by nearly 1,400 because of the Right to Buy.[24] Nearly half of the homes sold under Right to Buy are now owned by private landlords and let at market rent.[25]

Just over 2,000 households on the housing register are overcrowded. Around 200 have homes larger than their needs. [26]

Just over 2,700 Haringey households are currently homeless and living in Temporary Accommodation. 61 per cent of these households are from BAME groups. 43 per cent of residents accepted as statutory homeless are Black. [27]

[10] Inequality in life expectancy at birth LA 2017-19, Public Health Outcomes Framework
[11] 2011 Census
[12] Greenspace Information for Greater London, GLA 2014
[13] Tenure of Households by Borough, Annual Population Survey, ONS 2019; and research commissioned for Haringey Selective Licensing Evidence Base, Metastreet 2019
[14] Tenure of Households by Borough, Annual Population Survey, ONS 2019
[15] 2011 Census
[16] London's Poverty Profile, Housing tenure over time, Trust for London
[17] UK House Price Index, Land Registry 2020
[18] ONS Annual Survey of Hours and Earnings 2020
[19] Tenure of Households by Borough, ONS 2020; Subnational estimates of dwellings by tenure 2012 to 2020, ONS 2022; and research for Haringey Selective Licensing Evidence Base, Metastreet 2019
[20] Tenure of Households by Borough, ONS 2020 and Subnational estimates of dwellings by tenure, ONS 2022
[21] Subnational estimates of dwellings by tenure 2012 to 2020. ONS 2022
[22] Haringey Council data; and Local Authority Housing Statistics data returns, MHCLG 2021
[23] Haringey Council data
[24] Haringey Council data; Local authority housing statistics data returns for 2020 to 2021, DHLUC
[25] Right to Buy to Let, Inside Housing research August 2015
[26] Haringey Council data, January 2022
[27] Haringey Council data, January 2022

More than 11,000 households, including those homeless households, are currently waiting for social housing on the housing register. [28]

Strategic objective 1: Delivering the high quality and sustainable new homes Haringey needs

In numbers – the need for high quality and sustainable new homes

During the five years of this strategy Haringey's population is expected to increase by 8,800 people to 281,200.[29]

10 per cent of people in Haringey have a disability; 4,500 people have a serious physical disability.[30]

A quarter of Haringey's households have dependent children; a third are people living alone.[31]

Most Haringey residents will never be able to buy a home in the borough. People in Haringey earn less than the London average.[32] But house prices are higher than the London average. [33] The median price for a home in Haringey is £603,949 [34] - nearly 17 times the borough's median household income of £35,769.[35] Less than half of Haringey households own their home[36] - and the proportion is decreasing. Nearly 13,500 households currently resident in Haringey cannot afford to own their own home but would aspire to do so; and fewer than 3,000 of these households would be able to afford even shared ownership or other forms of discounted market sale.[37]

Private rents are out of reach for many people in Haringey. The median monthly rent in Haringey is £1,250 for a one-bedroom flat – nearly half the median pre-tax income for working people. The median private rent for a two-bedroom home is £1,475, and £1,800 for three bedrooms.[38]

Nearly 11,300 households are waiting for social housing on the housing register. 2,000 of those households are living in overcrowded homes, and 2,700 households are living in temporary accommodation. 35 per cent of all households in bands A and B on the housing register need a three-bedroom home; 12 per cent need a home with four or more bedrooms. At least 205 households in Council housing have homes larger than their needs.[39]

In addition to households currently living in unsuitable homes and unable to afford to buy or rent privately, around 350 new households unable to afford market housing will form in Haringey every year.[40]

[28] Haringey Council data, January 2022
[29] GLA 2020-based Population Projections, London Datastore
[30] Census 2011
[31] Census 2011
[32] Annual Survey of Hours and Earnings, 2014-2020
[33] UK House Price Index, Land Registry December 2021
[34] UK House Price Index, Land Registry December 2021
[35] ONS Annual Survey of Hours and Earnings 2012-2020
[36] Tenure of Households by Borough, Annual Population Survey, ONS 2019
[37] ORS Housing Model, Haringey Strategic Housing Market Assessment 2021
[38] Private rental market summary statistics in England, ONS December 2021
[39] Housing register data, January 2022
[40] ORS Housing Model, Haringey Strategic Housing Market Assessment 2021

Excluding housing specifically for older tenants, just a third of the Council's 14,000 rented homes have three or more bedrooms. Overall, more than a third of the Council's homes have one bedroom.[41]

Although three quarters of households on the housing register are aged under 50, nearly a third of those in the most urgent need are over 60 years old. A third of households in the most urgent housing need have a disability. [42]

A quarter of land in Haringey is open space. However, access to green space varies significantly across the borough, with just two fifths of homes in West Green and Noel Park having good access to green space.[43]

There is a housing shortage in Haringey, and a chronic shortage of homes that residents can afford – as there is across the whole of London. We will do everything in our power to address this. We will work with partners to deliver new homes, with the right mix to meet our communities' diverse needs. And we will continue to deliver a new era of Council homes in Haringey, building on the achievements of the past four years, with 3,000 new Council homes delivered by 2031.

We have three objectives in this area:

1.1Supporting the delivery of 1,592 new homes every year in Haringey
1.2 Ensuring the right mix of homes for our communities
1.3 Establishing a new era of Council home building

1.1. Supporting the delivery of 1,592 new homes a year in Haringey

1592 new homes a year

There is a housing crisis in Haringey, as there is across London, and the UK. For many years as a country, we have simply not built enough homes.

The Greater London Authority has assessed the need and capacity for new homes across the capital, and the resulting 2021 London Plan sets out the framework for London's development over the next 20 years. The London Plan identifies capacity for more than 52,000 new homes per year in London and sets targets for the number of homes that each borough should deliver.

Haringey's ten-year housing target is 15,920 new homes as set out in the London Plan. We will deliver at least 3,000 of those homes ourselves as Council homes. We also have a crucial role facilitating the delivery of the remaining homes. We will do this by working with the Mayor of London, Housing Associations, private developers, construction companies, and other partners, and by adopting an approach to planning and policy that will create the environment in which these new homes can be built in Haringey. We are proud to contribute towards London's housing need and are clear about the shared responsibility of London's boroughs in meeting this.

[41] Locally held data, Haringey Council
[42] Locally held data, Haringey Council
[43] Greenspace Information for Greater London (GiGL), GLA 2014

Small, medium, and large sites and developers

To meet our community's diverse needs, we need different homes. This means we need many housing developers working in Haringey, building on large, medium and small sites across the borough.

Large private developers bring financial investment, expertise, and economies of scale, as well as local jobs and training. We know that there are sites and opportunities in Haringey that are well suited to large-volume providers, and we encourage their investment.

We will work with developers to ensure that their advantages are shared across the construction sector, by supporting the participation of smaller, local firms in their supply chains.

We will actively build supportive relationships with local small and medium sized construction firms so that they can thrive and deliver homes in Haringey.

Delivering more homes will require more capacity in the construction sector. We will build on existing partnerships with local education providers to increase the number of skills training and apprenticeships across the construction sector in Haringey.

We will particularly look to bring forward more small sites for housing. These sites are likely to be less attractive to larger construction firms. Small sites' contribution to housing supply is critical, and in Haringey small sites have delivered a substantial number of new homes. However, the smaller builders specialising in these sites now face a number of obstacles. We will work with local partners to help them to overcome these obstacles.

We need to make more effective use of land in Haringey. This includes careful building at higher densities, diversifying the size and location of sites, and promoting more carefully designed co-location and integration of housing with other types of buildings and uses.

We will work with other public sector landowners – including the NHS, Network Rail, and the emergency services – to release more land for housing, putting in place clear plans to bring forward sites for housing and developing partnership approaches to developing such sites. We will encourage and support different models of private and public sector delivery.

Modern methods of construction allow high quality, comfortable homes to be built rapidly. We want to see a significant increase in the share of new homes delivered using Modern Methods of Construction, particularly utilising capacity to precision manufacture homes and significant parts of homes offsite. We will work with the Mayor of London and other councils to develop the capacity, pipeline and consistency required for this new sector to make the impact it is capable of.

The Housing Strategy and the Local Plan

All Local Planning Authorities maintain a Local Plan, which guides development in the borough. Haringey has a Local Plan and is currently developing a new Local Plan. It will identify locations in the borough where many new homes will be built. The London Plan already identifies Wood Green and Tottenham Hale as areas with the potential to deliver a substantial amount of these new homes. We want the housing that will be built in these areas to revitalise high streets, create new employment opportunities, and improve the public realm, as well as delivering the homes our communities need.

We will identify and bring forward opportunities for greater intensification of land uses through measures such as the use of masterplans, planning policy documents, and brownfield land register. We will ensure that any intensification improves the health and wellbeing of local

residents by delivering improved community space, green space, public realm, and better use of underutilised land as the basis of additional homes.

The New Local Plan will set out detailed strategies for ensuring that all new homes are supported by the infrastructure they need, including health centres, schools, parks and play areas.

Homes built specifically for renting increase the diversity and for some tenants the security and quality of the private rented sector. Build to Rent developments can also help increase housing delivery through additional supply beyond what would be delivered through a housing market largely reliant on build for sale-led developments. We encourage the delivery of Build to Rent homes in Haringey, including to diversify and improve the private rented sector. But we do not view Build to Rent as a substitute for affordable housing.

We are committed to new homes in Haringey that are high quality, the right size, and that will both last and prove adaptable to the changing needs of our communities. There is no identified need for more Purpose-Built Student and Co-Living Accommodation in Haringey and consequently we do not encourage these schemes being brought forward where this would be at the expense of conventional housing for which there is a significant demonstrated need. We do not view co-living schemes as a substitute for affordable housing.

The New Local Plan will set our policies in regard to the delivery of high-quality self-build housing and Warehouse Living.

Solving the housing crisis will depend not just on building the right number of homes, but also on building homes of the right type, mix and quality. It is the Local Plan that sets targets for the delivery of affordable homes and the mix of new homes, and it will set standards for the quality of new homes we will allow in Haringey including their size, and energy efficiency and how safety will be ensured.

Zero carbon

The Council declared a Climate Emergency in 2019 and has set out a route map for the borough to become Net Zero Carbon by 2041. Half of all Haringey's emissions come from the way we heat and power our homes, so we will require developers of new homes in the borough to contribute to this Net Zero Carbon objective by only building homes that are sustainable and energy efficient.

Our Local Plan will set out how we will ensure that all new homes in Haringey will be constructed to zero-carbon standards, and that larger schemes are developed in line with 'circular economy' principles, which will minimise demolition waste and mean that new buildings are designed so they can be disassembled, and the materials re-used at the end of the building's life.

Design

We want all new buildings in Haringey, including new homes, to be well designed. This means that they respect and enhance the existing built and social environment. Our Local Plan will set out in detail how we require good design to ensure that all new homes in Haringey do this. A design-led approach is crucial to achieving this, and we will require through our Planning Powers that all larger developments adopt this principle.

We will also take the opportunity offered by new housing development to improve the environment and public space for existing residents.

We will work with housing developers to support design quality including through our Quality Review Panel, where independent professionals scrutinise major development proposals, and through the Haringey Design Awards which celebrate good design and conservation.

1.2. The right mix of homes for our communities

Alongside the failure to build enough homes, our housing crisis stems from a failure to deliver enough affordable homes. New housing in Haringey must meet the needs of all our residents, including those who need more affordable homes. We also need to ensure that we are building homes that are the right size for our current and future households. We will use the framework of the New Local Plan to ensure that the right mix of homes is built in Haringey. The New Local Plan will also look to protect the existing supply of larger family homes in the borough. Our Strategic Housing Market Assessment 2021-2036 sets out the kinds of homes the borough will need and informs this objective.

Genuinely affordable homes

We need to increase the number of genuinely affordable homes in Haringey, and we are committed to doing this. Our New Local Plan will set out in detail how we will use our planning powers to maximise the supply.

An overwhelming need for affordable housing

The systemic housing crisis means that our overall need for affordable housing is itself greater than our target of 1,592 new homes of all kinds a year. This presents an enormous challenge to us, and is why we will push hard for as many of our new homes as possible to be genuinely affordable.

Types of affordable housing

Many kinds of home are officially classed as 'affordable'. Until recently, even homes let for 80 per cent of market rent – far beyond what most people in need can afford - were counted as 'affordable'. Homes for shared ownership, for social rent, and for intermediate tenures such as London Living Rent all count as affordable. But not all of these are genuinely affordable to most people in housing need.

Of our households in housing need, only 19 per cent could afford a home for shared ownership or discounted market sale. 81 per cent of people in housing need could not.[44] So where affordable housing is built in Haringey, we want the vast majority of it to be built for rent.

Of our households who can afford affordable rented homes, only 17 per cent could afford to pay London Living Rent. 83 per cent could not. [45] So where homes are built for affordable rent in Haringey, we want the majority of them to be built for social rent.

Delivering affordable housing in Haringey

Our first preference is that the Council delivers new homes directly. Where there are opportunities to build homes on Council land, the Council will deliver these directly. Where we have leased our own land for purposes that no longer meet our communities' needs, we will look to regain control of it. We will also look to acquire land on which to build Council homes.

[44] Haringey Strategic Housing Market Assessment, ORS 2021
[45] Haringey Strategic Housing Market Assessment, ORS 2021

We will continue to ensure that private development in the borough delivers new affordable homes. Since 2011, 50.4 per cent of all housing delivered on sites of ten or more homes has been secured as affordable homes.

Where private developers are proposing to develop new homes on land they have acquired, and where it is financially viable to do so, the Council will seek to acquire homes before they are built so that they are built as Council homes for Council Rent. We will look to secure first refusal on affordable housing negotiated through Section 106 planning agreements.

Housing Associations will continue to deliver a large proportion of affordable homes in Haringey. We will work closely with them to support their delivery of homes that are genuinely affordable, with a strong preference for social rented homes or, where GLA funding has already been obtained on that basis, for London Affordable Rent.

We welcome the contribution that community land trusts make in delivering new housing and will actively work with community land trusts who share our vision of delivering genuinely affordable housing for Haringey residents. We particularly welcome the knowledge and understanding of local areas, local needs and local communities that community land trusts bring.

Intermediate housing in Haringey

The category of intermediate housing includes homes for sale below market prices and homes for rent at a cost above social rent but below market levels. These are affordable options for some households who are either not eligible or have no priority for social rented housing but for whom the market does not provide a solution. The London Plan requires that at least 30 per cent of Affordable Housing is delivered as intermediate housing, and we will support providers' proposals for intermediate housing at that level.

We would prefer that intermediate housing should be for London Living Rent as this is the most genuinely affordable intermediate tenure for Haringey residents. However, the Government's policy is currently that 25 per cent of all homes delivered through section 106 planning agreements must be sold as First Homes. Our approach to this will be set out in our new Local Plan.

Meeting the needs of all household types

We want to make sure that there are enough homes for households and families of all kinds and all sizes. However, the shortage of affordable homes for larger families is particularly acute.

Our priority is to meet the most pressing need for each household size on our housing register. We have compared that demand with the number of lets expected in each size category across the next five years and accordingly set our target dwelling mix for **Social Rent** and other low cost rented housing as:

- 10 per cent one-bedroom homes
- 40 per cent two-bedroom homes
- 40 per cent three-bedroom homes
- 10 per cent four-bedroom homes

The target dwelling mix for partners delivering homes for **London Living Rent** and other intermediate rented housing is:

- 10 per cent one-bedroom homes

- 25 per cent two-bedroom homes
- 45 per cent three-bedroom homes
- 20 per cent four-bedroom homes

The target dwelling mix for **affordable home ownership** reflects the capacity of households in housing need to afford this tenure and therefore prioritises homes with one or two bedrooms:

- 65 per cent one-bedroom homes
- 30 per cent two-bedroom homes
- 5 per cent three- or four-bedroom homes

Supported and sheltered housing

We want the right mix of supported housing to meet the needs of our residents.

Although we have a substantial existing stock of supported housing for older people, it no longer provides the right mix of homes for older people. And we have very little supported housing of our own for residents with other needs who require it.

We will rebalance our existing stock where possible to better meet the needs of our vulnerable residents. When we embark on this we will work in partnership with older residents, care and support providers, and across the Council to determine what is needed to ensure the right mix of safe and supportive homes for older people.

However, it is clear that we also need to build new homes for older, disabled, and vulnerable people. We are developing a detailed needs analysis and design specification to guide and inform this work.

The design and delivery of new supported housing will always be co-produced with the resident groups who will live in it.

We will use our planning powers and existing partnership arrangements to work collaboratively with Housing Associations and other partners seeking to deliver new supported housing schemes in Haringey that meet our residents' needs. Our supported housing needs assessment sets out our communities' most pressing needs, and we will keep this assessment under review to ensure it informs our actions with the most accurate information.

Some residents with support needs will also be offered homes through social lettings quota arrangements to the Housing Register, set out in our Annual Lettings Plan. These residents will be offered visiting support in their homes, including through services such as Housing First.

Affordable homes for disabled residents

Around 13,000 households living in Haringey include a person with a limiting long-term illness or disability that impacts on housing need.

23 per cent of social renters are limited in their day-to-day activities by disability or serious illness. 32 per cent of those in the most urgent need on the housing register have a disability.

We will therefore ensure that more than 10 per cent of all new affordable homes built in Haringey will be wheelchair adaptable. We will ensure that 20 per cent of the council homes we deliver will be wheelchair adaptable and would encourage other housing developers to meet this higher standard.

The Gypsy, Roma, and Traveller Community

Prejudice, discrimination, and social exclusion severely affects the Gypsy, Roma, and Traveller community's access to services, jobs, and housing security. Across London, many council sites have closed, and no new sites have been built for the past 20 years. Over the next five years, we will increase the number of pitches for the Gypsy, Roma, and Traveller community. We will do this in partnership with our communities.

1.3. A new era of Council house building

Building high quality Council housing is one of the most important things we can do. For many people, a Council home offers the only real chance of putting down roots in Haringey.

A growing programme

After 40 years during which councils were stopped from building, in 2018 we started a new era of Council home building in Haringey. We have already completed nearly 200 Council homes, and have started on site to deliver over 1000 Council homes. We will continue to build up the Council's capacity to deliver the Council homes Haringey needs, and we will make sure our Council Housing Delivery Programme is financially viable in the long term. By 2031, we will have completed more than 3,000 new Council homes.

Financing the programme

We will ensure that we have a programme that is sustainable for the long-term, including by borrowing prudently against future rental income and working closely with the GLA to ensure the maximum capital grant support for our programme.

Borrowing and current grant levels alone will not support a financially viable programme. We will therefore cross-subsidise the delivery of homes for social rent by directly developing homes for sale, investing all profits through the HRA in building homes for social rent. We will build only as many homes for sale as are required to make the programme viable. The proportion will be guided by the HRA Business Plan's Medium Term Financial Strategy which is under annual review but currently requires around a fifth of the homes we build to 2025 to be for market sale. To date, 19 per cent of the homes in our programme are for market sale. Any council developments that include homes for market sale will be tenure blind in design and appearance. Blocks will never have segregated access to facilities such as playgrounds. And we are developing Council homes for rent and homes for market sale across the whole borough, which will contribute to rebalancing our stock geographically.

Residents and neighbourhoods

We will ensure that our residents, who know the area best, are at the heart of decision-making and shaping the development of new homes in their communities. We will follow a clear process to co-produce change with the community: listening to communities, defining clearly the elements of a project we can work with the community to influence, developing the project through engagement, testing designs and delivering, monitoring, reviewing, and reflecting on lessons learnt.

We will develop a Neighbourhood Approach to respond to the particular contexts of neighbourhoods that residents relate to, and we will develop strategies to deliver improved community space, public realm, and better use of underutilised land as an intrinsic part of the new Council homes our communities need.

We will continuously learn how to improve the homes we build. We will seek feedback and measure the satisfaction of new residents with their new home over the first five years. We will build in learning reviews after set stages of each project and post-completion.

The right homes for our residents in housing need

There is a need for one- and two-bedroom Council homes, particularly amongst those who currently have the highest priority on the housing register. We will continue to build them – but not bedsits or studios.

The shortage of Council homes for larger households is particularly acute. In line with our target dwelling mix, half the Council homes we start developing ourselves from the adoption of this strategy will therefore have three or more bedrooms. Our design-process is always site-specific: some sites will not lend themselves to larger homes, so we will aim to achieve our target across the overall programme rather than on each site.

Design and quality

Our new generation of Council homes will have the highest standards of design quality – so that homes are well-designed, but also safe, comfortable, and accessible. This means:

- Design and architecture will respond to and enhance the area's character
- We will actively involve residents in the design process, including in decision making around design
- Internally, homes will be well-lit, private, comfortable, safe, and welcoming
- Wherever possible, homes will have their own private outdoor space as well as direct access to communal open spaces
- Outdoor areas and entrances will be well-lit and overlooked to promote safe spaces
- Facilities such as bin stores will be convenient and secure

Sustainable homes

Climate change, carbon management, and sustainability will be integral to the design of our new generation of Council homes. The Council has ambitious targets around all these areas to ensure sustainability standards for new Council homes. This means:

- Housing developments will target both passivhaus and net zero carbon in terms of regulated operational emissions
- Homes will be built using environmentally sustainable materials to reduce carbon emissions associated with the sourcing and production of materials
- Homes will be positioned to make maximum use of sunlight in the winter to reduce energy demand
- The design of homes will promote affordable energy costs and sustainable energy sources
- Homes will manage the risk of excess heat including through orientation, shading, insulation, green roofs / walls, ventilation, and future retrofit plans
- Housing developments will seek to maximise the opportunity for new planting, including trees, sustainable drainage and biodiversity
- Homes will support safe and active travel including cycling and walking for all, including cycle storage

Our new generation of Council homes will be easy and affordable to look after – for the Council and for the tenant. This means:

- Homes will be built with high-quality materials that are simple to maintain and repair, and that stand the test of time by ageing gracefully
- Homes will use fittings and materials which are easy to replace

Supported housing and bespoke housing

10 per cent of the new homes the Council directly delivers over the next five years will be supported housing. Although not all potential housing sites are suitable for supported housing, we will explore this as an option on every Council housing delivery site.

Building new Council homes gives us the opportunity to design some homes specifically around the individual needs of households on the housing register who, because of the nature of their additional support needs, cannot be adequately housed either through relets of existing social rent homes or in the new Council homes we are building.

20 per cent of our new Council homes will be wheelchair adaptable. We have an opportunity to adapt those homes to meet the individual needs of disabled households well in advance of letting them.

We are developing a Bespoke Homes Programme to bring together partners across the Council with the NHS in order to identify households with specific housing needs related to their disabilities and medical conditions in order to design and deliver new Council homes for them on an individual and bespoke basis.

Sites for housing development

Most of our new homes will be built on Council land – including land currently occupied by garages or car parking spaces, or land between existing blocks. We will make the most of sites' capacities, and we will look at sites that currently have other land uses than housing. The benefit of new homes will sometimes have to be balanced against the loss of amenities. These are challenging trade-offs that we will always approach with residents openly and honestly. We will always seek to ensure that new homes improve the area for existing residents. We will ensure construction has minimal impact on residents, and we will integrate repairs and improvement works to existing buildings with our delivery of new homes. However, our absolute commitment to building the homes that all our communities need will sometimes require difficult decisions.

There may be occasions where the demolition of existing homes is one option for delivering new ones. No Council homes will be demolished unless this is what most existing residents want, and unless more Council homes of a better quality will be delivered on the site. If demolition is proposed as an option at any site, those proposals will be subject to extensive consultation and in some circumstances to a ballot of residents. Our existing Estate Renewal Rehousing and Payments Policy and the Neighbourhood Moves Scheme guarantee a right of return to any secure tenants and residential leaseholders whose homes will be demolished.

As an integral part of the programme, we will also actively seek out opportunities to acquire homes to let at Council rents. In some cases, this will mean acquiring homes being developed by private developers that will become affordable housing under existing s106 agreements. The Council aims to acquire homes at as early a stage as possible in order to ensure that the homes meet its standards and the needs of Haringey's communities. Wherever possible, this means acquiring before building has started.

Strategic objective 2: Improving housing quality and resident services in the social housing sector

In numbers – social housing in Haringey

More than one in five people in Haringey live in a home rented from a social landlord[46]. Over 15,000 households rent from the Council [47] and over 12,000 rent from a housing association.[48]

Fewer than four households in every ten of those renting from a social landlord has children[49].

One person in every ten people renting from a social landlord is aged 65 or over, only a slightly higher rate than for the wider population.[50] However, a much higher proportion of Council tenants than Housing Association tenants are older: four in every ten Council tenants are aged over 60.[51]

Almost one person in four renting from a social landlord is limited in their day-to-day activities by disability or serious illness – far more than the 13.7 per cent of Haringey population. Three quarters of social renters affected by disability or serious illness are aged under 65.[52] A third of Council tenants have a disability. [53]

Two thirds of Council and Housing Association tenants have a household income less than £20,000 a year.[54]

Council tenants are disproportionately from BAME backgrounds. A third identify as Black. They are much older than the borough in general.[55]

Council tenants who are young, Black, Bangladeshi, or women are much more likely to live in overcrowded households. 60 per cent of severely overcrowded households are Black. 55 of the Council's 1,612 Council blocks have six or more storeys.[56]

Nearly a fifth of the Council's homes do not yet meet Decent Homes standards.[57]

A social tenancy is secure and affordable, and, for many of our residents, has enabled them to put down roots in Haringey, attend the borough's excellent schools and make the most of the opportunities that London offers.

The Council itself has a housing stock of 20,000 homes. Three quarters are lived in by Council tenants; with the remaining being leasehold properties, lived in by owner-occupiers or private

[46] Subnational estimates of dwellings by tenure 2012 to 2020. ONS 2022
[47] Haringey Council data; and Local Authority Housing Statistics data returns, MHCLG 2021
[48] Haringey Council data
[49] Labour Force Survey household data, 2020
[50] Census 2011
[51] Locally held data, Haringey Council
[52] 2011 Census
[53] Locally held data, Haringey Council
[54] Housing in London 2020 The evidence base for the London Housing Strategy
[55] Locally held data, Haringey Council
[56] Locally held data, Haringey Council
[57] Locally held data, Haringey Council

tenants. As a landlord, we will ensure that our homes are safe, warm and well maintained, and that our tenants and leaseholders are listened to and provided with a good service. We see our role directly providing housing to our residents as a core part of the Council's work in the borough.

We are but one part of the social housing sector in Haringey, with many housing associations also providing homes for Haringey residents – and we will collaborate with all registered providers in the borough to provide a strong social housing sector. We will take a leading role in ensuring that all social housing landlords work together to improve the quality of life for their residents.

We have four objectives in this area:

2.1 Ensuring and improving the quality of our Council housing
2.2 Improving services to our tenants and leaseholders, and designing these with them
2.3 Embedding these functions into the Council's core business
2.4 Collaborating to help drive improved services in the sector across the borough

2.1 Improving the quality of our Council housing

We have an objective to significantly grow our housing stock – with an increase of 20 per cent of our tenanted stock by 2031 – because we know how important a Council home is to so many of our residents. As well as investing in building new Council homes, we are also investing in our existing homes to ensure that they are modern, good-quality and pleasant to live in; and to ensure that our tenants are able to thrive.

Investment in our stock

We have a wide range of housing stock across the whole borough ranging from large estates, blocks and street properties. We are proud of our housing stock, and we want residents to be as well. We are committed to ensuring that all of our stock meets the Decent Homes standard by 2025. Our Asset Management Strategy 2020-2025 sets out how we are achieving this.

Our investment in our stock goes beyond the Decent Homes standard to include communal internal areas of buildings and wider estate improvements, because our tenants' experience of, and pride in, their homes does not only start at their own front doors. Our overall scope includes statutory improvements to homes and the wider estate, including the Decent Homes standard and building safety.

Safety across our stock, and across the borough

We are clear that all our housing stock needs to be fully safe and meet all building standard regulations, and that everyone living in Haringey, whatever their tenure and whoever their landlord is, has a safe home and feels safe in their home. As a landlord, we have measures in place to ensure we meet all current as well as emerging building safety regulations.

Our housing and net zero

Housing is a major contributor to the borough's carbon emissions. As well as ensuring that our new homes are energy efficient, we also have ambitious objectives for our existing housing stock. We will retrofit our existing stock to make sure that homes which are not energy efficient become so, and are able to be heated in a cheaper and more sustainable manner – which is better for households and for the borough as a whole. We are investing substantially to ensure

that our housing stock is made significantly more energy efficient, with an ambitious target to bring all our stock to an average Energy Performance Rating Band B by 2035.

A holistic approach to maintenance

We know that works on homes and estates can be disruptive to tenants. So we will take a holistic approach to our maintenance. This means that all internal, external and communal works will be programmed over a 3–5-year period for delivery at the same time, as far as is reasonably practical. We will include our Council Housing Delivery Programme in this as far as possible. This means that when we undertake works on any of our housing stock we aim to complete all works as part of one period of intervention. And when we may be building new homes on an estate we will look to integrate this with other major works.

Investing in our homes and the wider community

We are investing significant amounts of money into our housing stock over the coming decade. We will enter into long-term agreements to work in partnership with external organisations to deliver these major improvements together. We are clear that where we procure major contracts, we need to make sure that we are getting not just financial good value but also added value for the whole borough and our residents. These long-term partnerships will therefore also deliver employment and training opportunities for residents, including opportunities for apprenticeships, and for local firms to be used by our strategic partner. And we will take this opportunity for enhanced resident engagement in the procurement and delivery of the capital programme.

2.2 Improving services to our tenants and leaseholders, and designing these with them

Our tenants and leaseholders deserve the highest level of service from us as their landlord, and to be listened to and actively involved in service delivery and decisions about their housing. And beyond managing homes, we will work across the Council and borough to support our residents to live healthy and fulfilling lives.

Resident participation

We will make decisions alongside our residents – tenants, leaseholders and private tenants. This means that we will ask residents for their involvement, listen to them, and trust that those who live in our houses and estates have the greatest knowledge and understanding of their homes, and of other services provided locally. We are actively committed to co-production and co-design with all of the borough's residents, and when it comes to our own tenants and leaseholders, we have a particular responsibility and opportunity to genuinely design services together. As well as listening to our residents and taking on board their views, we will actively and consistently ensure that we are hearing from residents. This means that resident involvement will be a requirement, and not an optional part of service delivery. We will use diverse methods, mechanisms and forums to do this, and will ask residents to inform the ways in which they are involved.

Communication and problem solving

When residents come to us with a problem, we will resolve it as quickly as possible, and with as little inconvenience to residents as possible. To do this, we will ensure that the systems that we use are modern, efficient and user friendly, so that residents can communicate with

us clearly and easily. We will make every contact count – so that residents do not need to relay the same information to different people. And we will aim to get it right the first time. We will enable simple and user-friendly digital communication channels but will always provide an option for those who would prefer to, or need to, communicate in another manner.

We will regularly share information with our residents. And we will ensure that when we communicate with our tenants – about planned works, new initiatives, or anything else – we do this clearly and in sensible timeframes.

We will also take a proactive approach to solving residents' issues. This means identifying potential problems before they occur.

Broader support to all our residents

Whether they are tenants, leaseholders or private renters, those who live in our stock are Haringey's residents and we will use our privileged position as landlord to make sure we are also offering other support. We will go beyond housing management and maintenance to ensure our residents' health, wellbeing and resilience. This means actively sharing information and advice and equipping housing officers to deal with issues not related to housing and both signposting residents to other services and referring residents to those where appropriate. We are particularly committed to making sure all our residents have access to good advice to help them manage their finances, and as a landlord we will always flag any concerns we have with our financial inclusion team, so we can intervene positively as early as possible.

We know the benefits to residents of having visible housing staff on estates, so we are moving towards an area-based approach. We want our residents to recognise, and trust officers, and know that they can approach them for advice and guidance on many issues beyond their housing. And in return, our officers will support residents, and be ambitious for them.

Our homes and the wider environment

Our houses and estates are homes to those who live in them, and a part of the neighbourhood to those living, working, studying or playing nearby. So making sure they are pleasant places and contribute to the borough's environment is especially important. We work in partnership across the Council and borough to ensure that anti-social behaviour, waste management, parking, green space maintenance and landscaping is well managed. And we are also committed to using our Council Housing Delivery Programme to deliver wider benefits to existing estates, by using the opportunity of development to invest in estates and improve facilities for everyone. We will strengthen partnerships with key bodies such as the Police, and ensure joint working between our partners and agencies consistently improves community safety on our estates. We will invest in the environment developing and implementing plans with the community that ensure our estates are safe, vibrant neighbourhoods that our communities are proud to live in.

2.3 Embedding these functions into the Council's core business

Providing housing to our residents is a core part of the Council's business. And as we continue to grow our housing stock, and our number of Council tenants, this is even more important.

Following an extensive consultation with tenants and leaseholders, we have decided to bring our housing management services back under the direct management of the Council. This will ensure that the Council is directly accountable for the maintenance and management of its housing stock. And we will also take this opportunity to make sure that housing services are fully integrated with all Council services. We are our tenants' landlord, but we also have wider responsibilities towards them as Haringey residents. As well as ensuring that their homes are well maintained and managed, we also need to make sure that we are helping our tenants live healthy lives, access the best employment opportunities in, and out of, the borough, support children and young people in their education, and in accessing training and employment opportunities, and providing broad and targeted support to vulnerable households. Allowing stronger internal links between our housing services and the other services provided by the Council, statutory and non-statutory, will allow us to provide a better all-round service.

We are particularly clear that bringing our housing management services under direct management will give us the opportunity the rethink how we strengthen our residents' voice, centre residents in our decision-making and genuinely co-produce and co-design services with them.

2.4 Collaborating to help drive improved services in the sector across the borough

There are over 13,000 social tenants living in homes owned and managed by housing associations in Haringey. All social tenants, whether their landlord is a Council, large housing association with stock across the country, or small, local, housing association, should expect the same high-quality service and well-maintained homes.

As a sector, we are bound by the same regulatory frameworks, which set the baseline for our responsibilities to our tenants. These became more-high profile following the Grenfell Tower fire, and the past few years have seen increased legislation and white papers regarding social landlords' responsibilities.

But more than this, we are also bound by a shared commitment to tenants and the borough, and to not only making sure that our homes are good quality, well maintained and managed and that tenants are provided with a good service, but also that our contributions to the borough go beyond this. This is why we are committed to forging a genuine partnership with all housing associations in Haringey; to work towards not only our shared aspirations and challenges as landlords, but also to create our shared vision of our borough.

Strategic objective 3: Improving the Quality of the Private Rented Sector

In numbers - private renting

More than a third of the Haringey population live in homes rented from a private landlord.[58] This is more than the London average,[59] and more than the number renting from a social landlord - the Council or a housing association.

The quality of private rented homes varies enormously. But more than one home in every four rented from a private landlord in Haringey - nearly 12,000 homes - is in such poor condition that it presents a risk of harm to the health or safety of its tenants. One in twenty does not meet minimum legal requirements for energy efficiency. Our own data shows that homes in the worst condition tend to be in the east of the borough, with particular concentrations in Bruce Grove, St Ann's, and Tottenham Green.[60]

The private rented sector is overwhelmingly dominated by small-scale landlordism: mainstream commercial property investors account for just over three per cent of residential rental stock.[61]

Private rents are also out of reach for many people in Haringey. The median monthly rent in Haringey is £1,250 for a one-bedroom flat – nearly half the median pre-tax income for working people in the borough.[62] The median private rent for a two-bedroom home is £1,475, and £1,800 for three bedrooms.[63]

London's private renters broadly reflect the income distribution of the wider population. 58 per cent of private tenants are in the top two fifths of the national household income distribution and 14 per cent are in the bottom fifth [64]

A quarter of private renters nationally said they found it difficult to afford their rent. In 2019-20, 60 per cent of private renters reported having no savings. Nearly half of private renters do not expect to ever own a home.[65]

A fifth of private renters in Haringey - 7,800 households - are in receipt of Housing Benefit.[66]

Private renters are more likely to have children than social renters. Nearly one in three private renting households in London include children, up from one in five in 2004.[67]

Private renters tend to be younger and healthier, and they are more likely to be in paid work than social renters.[68]

[58] Tenure of Households by Borough, ONS 2020; Subnational estimates of dwellings by tenure 2012 to 2020, ONS 2022; and research for Haringey Selective Licensing Evidence Base, Metastreet 2019
[59] Tenure of Households by Borough, ONS 2020 and Subnational estimates of dwellings by tenure, ONS 2022
[60] Analysis of Private Rented Sector, Metastreet – commissioned by Haringey Council, 2021
[61] *The Evolving Private Rented Sector: its Contribution and Potential,* Dr Julie Rugg, 2018
[62] ONS Annual Survey of Hours and Earnings 2020
[63] Private rental market summary statistics in England, ONS December 2021
[64] English Housing Survey 2019-20
[65] English Housing Survey 2019-20
[66] Council data
[67] English Housing Survey, 2019-20
[68] English Housing Survey 2019-20

Six in ten are aged between 25 and 49 – far more than the population in general and significantly more than in any other tenure[69]. However, London-wide data shows that there has been an increase over the last decade in the number older private renters, with 10 per cent now aged between 55 and 64.[70]

Only two in every twenty-five private renters are limited in their day-to-day activities by disability or serious illness – almost half the rate of the wider Haringey population.[71]

Most private renters in Haringey do not self-identify as white British. More than a third of private renters define themselves as white but not British. Three in every ten are BAME.[72]

More than a third of Haringey's residents rent their home from a private landlord, and the number of privately rented homes is increasing. Private renters are as much a part of the Haringey community as owner-occupiers and social tenants.

Everyone in Haringey who rents privately should live in a home that is decent, safe, and secure, and should be treated fairly under the law. Most landlords ensure this. But more than a quarter of privately rented homes in Haringey do not meet decent standards - often because their landlord does not understand their responsibilities, sometimes because their landlords deliberately break the law.

Working in partnership across the borough, we will do everything in our power to ensure all privately rented homes are decent and safe, and that privately owned homes contribute positively to the borough's environment. And we will make sure that private renters understand their rights and know how to exercise them.

We have three objectives in this area:

3.1 Setting clear standards for the private rented sector and supporting landlords to meet those standards
3.2 Enforcing those standards and taking decisive action against landlords who will not provide their tenants with a home that is decent, safe, and secure
3.3 Empowering and supporting private renters to hold their landlords to these standards

3.1 Setting the standards and supporting landlords to meet them

Law and regulation governing private renting have evolved over many years and as a result are complex, multi-layered, and inconsistent. Most landlords only let one home, and some use an agent to manage their property. This means that it can be confusing for landlords to understand the standards required to let a home. Not only does this confusion account for a lot of poor practice, it also helps to create conditions that make it possible for criminal landlords to get away with deliberately providing unsafe accommodation.

[69] 2011 Census
[70] English Housing Survey 2019-20
[71] 2011 Census
[72] Census 2011

Our objective is for all landlords and agents in Haringey to understand their basic obligation to provide decent, safe, and secure homes for their tenants, and to treat renters fairly under the law.

Provide a responsive service

We will continue to provide a responsive service to private renters who seek our help because their landlord or agent is not providing them with a decent, safe, and secure home.

Using a risk-based approach, in all but the most urgent cases our first response is to work with the landlord, providing advice and guidance to ensure they understand their responsibilities under the law, and that they can meet those responsibilities.

Use licensing powers to include private rented homes

We know that most renters with poor conditions in their home will never contact the Council. That means that through a responsive approach alone we would have no contact with the vast majority of landlords or renters in the borough.

Licensing gives the opportunity to educate and improve the professionalism of landlords, allowing the move from a reactive to a strategic approach. so that all landlords and agents in Haringey understand their basic obligation to provide decent, safe, and secure homes for their tenants, and to treat renters fairly under the law by setting our clear standards and allowing landlords to receive support. Licensing allows us to identify good landlords, to support inexperienced landlords, and to challenge those that fail to improve.

Licensing also gives us the opportunity to engage with and educate renters, so that they understand their rights and responsibilities.

Houses in Multiple Occupation

Many thousands of people in Haringey live in a House in Multiple Occupation (HMO), renting a room and sharing facilities such as bathrooms and kitchens with other people. Unless they are very well-managed, HMOs present greater risks to renters' health, safety, and welfare than other kinds of rented housing. These risks are greatest in larger, multi-storied HMOs and those in properties converted from their original purpose. This is why converting any property to a HMO for seven or more occupants requires planning permission in all parts of Haringey, and for three or more occupants in the east of the borough, where there is a greater concentration of HMOs. And by law, landlords must get a licence from the Council for any HMO they manage that is occupied by five or more people who are not all related.

We will align our licensing and planning policies including around bedroom sizes and adequate provision of kitchens and bathrooms.

We want to prevent an overconcentration of larger HMOs because of the potential impact on neighbourhood amenities. We will develop specific planning requirements for these because the intensity of the use needs to be very carefully managed. We want large HMOs to provide adequate cycle storage, to be car free wherever appropriate, and to provide adequate bin storage.

But smaller HMOs also present particular risk and management issues. So in 2019, we put in place an additional licensing scheme. Under that scheme, landlords and agents of HMOs where three or more separate households rent rooms must also apply for a licence and follow very clear standards so that all HMOs are decent, safe, and secure. The Council will only grant a HMO licence where the landlord can show that the HMO is safe and well-managed.

Through additional licensing, we have already licensed 3234 homes. The additional licensing scheme runs until 2024. We will seek to renew our additional licensing scheme in 2024 if evidence shows that it has been effective in raising standards, as we believe it will.

Selective Licensing

Too many renters in all kinds of housing have to endure poor conditions in their home.

When private renters seek our help because of poor conditions, we make sure their landlords understand their responsibilities under the law and we support them to meet those responsibilities. In most cases, this improves conditions for the tenant. And where guidance and support are not effective, we can take enforcement action.

We know that this responsive approach reaches only a fraction of those landlords who do not provide decent homes. This is for three key reasons. Firstly, insecure tenancies mean that many renters do not feel able to take action. Secondly, when renters do contact us, we necessarily take a risk-based approach. Thirdly, our enforcement powers under environmental health and building safety legislation are narrowly defined.

We want to reach the tens of thousands of landlords we cannot reach through responsive interventions.

As well as their effects on tenants, poor housing conditions and poor housing management can undermine community relations. In the worst instances, they are a cause of crime. We want to ensure that decent housing management standards are met so that poor housing conditions are never a cause of friction between neighbours.

We know that poor conditions and poor housing management align with those parts of the borough where deprivation and poverty are worse. We know that poor property conditions make deprivation worse as tenants have fewer choices about where they can live. Fuel poverty, overcrowding and poor living conditions have a detrimental impact on the lives and health of those living in sub-standard accommodation

For all these reasons, we will seek to bring in a new selective licensing scheme for all homes rented from a private landlord in those parts of the borough where housing conditions for private renters are worst.

We will make sure that the scheme sets out very clear standards for landlords and agents including in relation to fire safety, gas and electrical safety, energy efficiency, and professional housing management.

We will ensure that the cost of obtaining a licence is fair for landlords. We believe that selective licensing will support good landlords by driving out criminal competitors.

We will use our licensing schemes to create a dialogue with local landlords so that we can provide advice, guidance, and support on improving conditions for renters.

Provide a proactive service

We will support landlords and their agents across the borough to understand and meet their responsibilities and more broadly to develop good practice. We will use regular landlord forums, training events, the London Landlord Accreditation Scheme, our own web pages, and other online channels to underpin this.

We will make sure that letting agents operating in Haringey understand the regulations governing their businesses. In particular, agents must know that it is unlawful to discriminate

against people receiving benefits, that almost all fees for tenants are banned, and that agents must belong to an independent redress scheme with powers to resolve disputes between letting agents and their customers.

More sustainable homes in the private rented sector

We will raise standards of energy efficiency in private rented homes by ensuring that EPC requirements are met, including as part of the licensing process. We will commission a service to identify the causes of poor energy efficiency in low-performing homes and propose solutions. We will actively direct landlords to grants for improving energy efficiency – including our own Green Homes Grant. We will also support owner occupiers to make their homes more energy efficient.

Clearer communication to tenants and landlords

We will bring our licensing, planning, trading standards, and other interventions in the private rented sector into better alignment, making sure that all our processes support each other and that together they set standards that are easy for landlords, agents, and renters to understand.

We believe that communicating these standards well is a fundamental part of improving the quality of private rented housing in the borough.

We will make sure that landlords and their agents can access information on licensing, planning, and other standards from a single point of contact.

Our role in the PRS

We will continue to improve conditions for the most vulnerable renters by taking an active role in the provision of privately rented accommodation. We will build on the Capital Letters partnership between sixteen London boroughs to procure good quality privately rented homes for homeless Londoners and those at risk of homelessness. We want Capital Letters to play an increasingly important and successful role in London's private rented market. And we will continue to acquire homes to lease to the Haringey Community Benefit Society, for households in housing need.

We know that many of our own leaseholders are now private landlords. We will develop approaches to ensure that they understand and meet their responsibilities so that private renters on Haringey estates have homes that are decent, safe, and secure, and that housing conditions for private renters do not undermine community cohesion on those estates.

Empty homes

We are committed to bringing empty homes in the borough back into use.

Empty homes blight neighbourhoods and attract antisocial behaviour and crime. Developing an environment that is safe, clean, and green is a priority for the Council and our residents. Bringing empty properties back into residential use helps to create a safe and pleasant environment for all.

Nearly 1,200 homes in Haringey have been empty for more than six months. Most are empty due to temporary circumstances which their owners are actively resolving – for example, they are putting their property on the market, or are temporarily out of the country, or are seeking planning permission or funds for development or renovation. However, too many homes remain empty on a long-term basis. 284 homes in Haringey have been empty for more than two years; 88 of those have been empty for more than five years.

We will take a risk-based approach to tackling empty homes. We will do everything we can to help and encourage owners of empty homes to bring them back into use. Advice and assistance will always be offered first, and in the vast majority of cases this will be sufficient.

However, where owners of empty homes cannot be traced, or they are unwilling to work with us in a meaningful way towards bringing their property back into use, we will not hesitate to use the range of enforcement powers available to us. These include Empty Dwelling Management Orders, enforced sale, and compulsory purchase.

3.2. Enforcing the standards

We will take decisive action against the minority of landlords and agents who refuse to meet those responsibilities. We expect all landlords and their agents to provide their tenants with a home that is decent, safe, and secure, and to treat their tenants fairly under the law.

Many landlords already meet these standards. We will support landlords who want to improve. But there is no place in Haringey for landlords who deliberately flout the standards. So where landlords or their agents will not comply with standards, including those set out in their licenses, we will take decisive action.

We will provide responsive enforcement for private renters who report that their homes are not decent or safe.

We know that renters in vulnerable positions often find it extremely difficult to complain. The private rental market serving low-income Londoners is characterised by dangerously poor physical standards and low or non-existent security of tenure. This is part of the reason we have introduced additional licensing for HMOs, and it is part of the reason we will seek to introduce selective licensing. We will use licensing powers to enforce standards without waiting for complaint. And we will take a smarter, more proactive approach to enforcement, based on robust risk assessment.

We believe that landlords who deliberately fail to license their properties where it is required are most likely to let homes that do not meet standards. We will enforce fines of up to £30,000 against landlords who try to evade licensing.

Where landlords will not bring tenants' homes up to standards, we will use our licensing schemes alongside the range of our environmental health, trading standards, and other legal powers to force them to do so.

We will fine and prosecute criminal landlords who will not comply with standards, including the criminal minority who evict tenants without following due process.

We will use trading standards powers to crack down on letting agents who cheat their customers and fail to meet standards.

We will also use trading standards powers to enforce against landlords who refuse to meet energy performance requirements.

We believe that communicating well is a fundamental part of improving the quality of private rented housing in the borough.

We will publicise our work against criminal landlords and agents, warning off prospective tenants and creating a culture of accountability. We will use external media as well as our own web pages and other online channels to underpin this.

3.3 Empowering private renters

We want all renters to know their rights, and to be able to hold landlords to account where those rights are not respected.

The complexity of housing law and regulation means that many renters do not understand their rights. A substantial minority do not know that they have rights.

Even where renters know their rights, many are unable to exercise them. London's housing crisis means that many renters, especially those with low incomes, have very limited choices. A third of private renters live in poverty and poor housing makes deprivation worse. In a market that aims to meet the fundamental need for shelter, this lack of choice translates into a lack of power.

We want renters in Haringey to understand their rights and to be able to enforce them. Where renters are unable to enforce rights on their own, we want them to have the support they need to act.

We will continue to provide specialist advice and support directly to private renters on issues ranging from the threat of eviction to disrepair through our Housing Needs service.

Making Every Contact Count, we will over the next five years equip all Council workers who work with, or meet, private renters to give basic initial advice on housing rights and to signpost to specialist services.

We will support private renters to access Council and voluntary services through our Connected Communities service. Connected Communities will continue to advise renters on a range of issues including housing rights, benefits, debt, adult learning, parenting, and childcare. We will focus on fuel poverty by identifying households at risk and providing targeted advice and support both to tenants and landlords.

We know that some people live in HMOs run by criminal landlords where illegal evictions, overcrowding, and unsafe conditions are common. These are among the most vulnerable renters, and their living conditions are often too precarious to act without support. We will provide dedicated support to these renters so they can resist illegal evictions, negotiate better conditions in their homes, and leave on their own terms, with compensation whenever possible. We will build on our existing partnership with Safer Renting to achieve that.

We can in most cases only take enforcement action against landlords and agents where they have contravened the conditions of a licence, where living conditions are detrimental to health and safety, or where a landlord has threatened or carried out an unlawful eviction.

In providing a responsive service to private renters who report that their homes are not decent or safe, we will be clear about the limits of our enforcement powers. Where we are not best placed to help through our enforcement powers, we will provide initial housing advice and signpost renters to specialist legal, advice, and support organisations.

We will establish a Private Renting Forum to bring together Council services, local support services, advice agencies, and renters' groups to develop best practice and a shared commitment to supporting Haringey's private renters.

We believe that communicating well is a fundamental part of improving the quality of private rented housing in the borough. We will promote private renters' rights using targeted campaigns in the areas and to the groups most affected. We will use external media as well as our own web pages and other online channels to underpin this. We will continue to work with Home Connections to provide online training for homeless people looking for private rented accommodation.

Strategic objective 4: Preventing and alleviating homelessness

In numbers – homelessness in Haringey

Around 2,700 homeless households are living in temporary accommodation provided by the Council – currently the fourth highest rate in London.[73]

Nearly two thirds of households living in temporary accommodation are Black, Asian or from another community of colour. Four in every ten households needing help from the Council for homelessness are Black.[74]

A quarter of young homeless people identify as Lesbian, Gay, Bisexual, or Trans.[75]

25 per cent of people rough sleeping in Haringey are Black, 19 per cent are white British, and 42 per cent white and not British.[76]

The number of people sleeping rough in Haringey has fallen significantly since summer 2018 – from 90 in July 2018 to 32 in July 2019 and just 9 in July 2020. Since March 2020, the Council has provided emergency accommodation and support for hundreds of people who had formerly been sleeping rough.[77]

The average age of death for women who experience rough sleeping is 42 years; for men it is 44. In Haringey, only 15 per cent of people sleeping rough are women[78]. Women are often hidden in rough sleeping statistics because they seek protection from gender-based harm on the streets by sleeping in squats, buses, and sex-working for accommodation.

Six people in every ten who sleep rough in Haringey have mental health problems. One person in every five has neither mental health problems, drug dependence nor alcohol dependence.[79]

Having a safe, stable place to live is a universal human need. Working with partners across the borough, we will prevent people from becoming homeless wherever possible. Where residents do find themselves homeless, we will offer a range of housing and support options to meet their needs. Our significant number of households in temporary accommodation who are unable to find suitable homes in the private sector is a key driver of our Council Housing Delivery Programme, which will deliver secure, affordable and good quality homes to help households currently in temporary accommodation or unsuitable housing.

We have four objectives in this area:

4.1 Preventing homelessness whenever possible

[73] Households in Temporary Accommodation, Trust for London 2021
[74] Locally held data, Haringey Council 2021
[75] Sexuality of Youth Homeless, locally held data, Haringey Council 2017
[76] CHAIN (Combined Homelessness and Information Network) data
[77] CHAIN (Combined Homelessness and Information Network) data
[78] CHAIN (Combined Homelessness and Information Network) data
[79] CHAIN (Combined Homelessness and Information Network) data

4.2 Ensuring that we have the right accommodation and support for people who are homeless or at risk of homelessness
4.3 Supporting people who are, or who are at risk of, rough sleeping
4.4 Ensuring that we are making the best and fairest use of our housing stock

4.1 Preventing homelessness whenever possible

Homelessness is a traumatic life experience. Our first priority is to prevent homelessness whenever possible. By doing this we can also prevent the devastating effects that becoming homeless has on people's lives, and the financial costs that stem from people losing their home.

We will work directly with those at risk of homelessness, intervene early and take a personalised and targeted approach to prevention. We will continue to do this not only because we have a legal obligation to under the Homelessness Reduction Act, but because we know that becoming homeless is a traumatic event that leads to multiple negative consequences for our residents. There are often interlinked causes and triggers to homelessness, so we will take a personalised and holistic approach to assessing and responding to individual housing needs and circumstances. That means offering as much choice as we can about how residents communicate with us, about the housing and support options available, and about assistance on connected issues such as debt, employment, health and social care needs.

We will work in partnership across the Council and Borough. We will continue to provide a dedicated service to work directly with people at risk of homelessness. Preventing homelessness is the responsibility of the whole Council, and something which our partners across the borough help us achieve.

Residents approach the Council for a variety of reasons and many may be at risk of homelessness. We will equip and support all Council services to give relevant information to people at risk of homelessness, and to be able to link them to specialist services if needed.

We will ensure that anyone who is homeless or at risk of homelessness can contact the Council easily, and that they will receive the help they need quickly – whichever department they contact, and whether that help is best provided by the Council or by another organisation.

We will ensure that our early intervention work supports tenants to sustain their tenancies and prevent them from becoming homeless. We will work with housing associations and other partners to do the same. Our strategic approach to the private rented sector, underpinned by landlord licensing and partnership work, will help to prevent private renters becoming homeless. We will work strategically with landlords in the borough so that they can support us in preventing homelessness.

We will bring housing providers, statutory services and third sector organisations together to work on joint initiatives, such as safeguarding vulnerable tenants, because we know that working in partnership is crucial to ending homelessness in Haringey.

We will carry out targeted interventions on some of the root causes of homelessness.

The loss of a tenancy in the private sector is the biggest cause of homelessness. We will use landlord licensing to increase our engagement with private landlords and their tenants. We will use that opportunity to ensure that both parties understand tenancy rights, that landlords are

able to consider options such as mediation or financial assistance rather than eviction, and that private renters can access support at an early stage to prevent homelessness.

Issues such as domestic violence, family and relationship breakdown, health problems and financial difficulties also put people at risk of homelessness. We will carry out targeted work to address the multiple causes and triggers of homelessness.

We will build on our strategic approach to supporting residents who face financial hardship and are at risk of finding themselves in unmanageable debt.

We will take the opportunities presented by the Domestic Abuse Act 2021 to shape future provision of safe accommodation for victims and survivors of domestic abuse and other forms of gendered and sexual violence.

We will continue to build our relationships with partners across the borough – including homelessness, health, criminal justice, advice, and advocacy organisations - so that we work together toward the shared goal of preventing homelessness for vulnerable single adults.

We will continue to commission specialist support services for people affected by homelessness with our statutory partners in the NHS, criminal justice agencies, and neighbouring local authorities, to improve the holistic outcomes of people experiencing homelessness.

Structural inequality means that Black, minority ethnic, and LGBTQI+ people are much more likely to become homeless. We will ensure that our policies, services, and the approach of our workforce responds to the specific assets, needs and barriers experienced by these residents. This is a part of our ongoing commitment to developing our practice and listening to our communities.

We will continue to support access to the free, independent advice that all people need to avoid homelessness. We will do this by commissioning a borough-wide information, advice and guidance service as well as providing funding for small specialist organisations working with specific communities who are at higher risk of homelessness.

4.2 Accommodation and support for people presenting as homeless or at risk of homelessness

Our second objective is to ensure that we have a range of good accommodation options for people who are at risk of becoming, or have become homeless. This is accommodation both to use as temporary accommodation and as settled accommodation for households leaving temporary accommodation, or who are presenting as homeless. We are also committed to supporting our households living in temporary accommodation, helping them to move to settled accommodation, and providing broader support.

Most of the housing we use for our homeless households, or those at risk of homelessness, is sourced from the private sector.

We will ensure that all accommodation we provide for homeless households is decent quality and stable. Most will be in Haringey; where it is not, we will look to place people in one of our neighbouring boroughs. All accommodation will be affordable for the household – but it will also need to be affordable for the Council.

Our first preference is to use homes sourced through our membership of Capital Letters or through the Haringey Community Benefit Society. Capital Letters is a pan-London initiative made up of a number of local authorities whose aim is to provide a supply of suitable accommodation for homeless households. Haringey is expecting to house 300 households in these homes in 2022/23. The Haringey Community Benefit Society is a not-for-profit organisation whose aim is to provide homes for people in housing need in Haringey, nominated by the Council. The Haringey Community Benefit Society currently has just under 300 homes to let to these households, on long-term tenancies which will generally last 7 years. Both organisations provide good quality homes with rents set at or below local housing allowance levels.

We will also support homeless households find a new home of their choosing through our 'Find Your Own' scheme.

Where we are unable to find a settled home, the Council will place households in temporary accommodation. Some of this will be in homes owned by the Council but the majority will be sourced from the private sector. Our preferred source of private sector temporary accommodation is from homes leased from the private landlords. This gives homeless households the security of knowing they will be settled in the same home for a period of time and gives us the assurance that temporary accommodation provides best value and quality. Our strategic approach to the private rented sector, underpinned by landlord licensing, will give us opportunities to engage with landlords to increase the supply of this kind of housing option.

We will continue to use nightly paid accommodation where we have to, as this offers us the flexibility we need to respond to emergencies. We will ensure that nightly-paid and emergency accommodation is of a decent standard through our partnership work with other councils in initiatives such as 'Setting the Standard'. Although many of these homes have been used for temporary accommodation for many years, given the short-term contract the Council is seeking to minimise the use of these where possible. We do not house families in bed and breakfast accommodation. We will use our lodges, which have shared facilities, for households who are awaiting decisions on their homelessness status.

We have around 2700 households who are living in temporary accommodation, both in Haringey and out of the borough. We work with residents in temporary accommodation to support them to move to settled accommodation, as well as providing them with broader support. This means that every household has its own plan to help them to understand their longer-term housing options. We will continue to do this and to provide broader support to our households in temporary accommodation, by supporting them to overcome obstacles preventing a move to settled accommodation, for example by providing employment support.

4.3. Supporting people who are, or who are at risk of, rough sleeping

Our third objective is to offer support to people who are, or who are at risk of becoming, street homeless. Our vision is for a borough in which nobody needs to sleep rough, because they have been provided with the right support, at the right time, to prevent this from happening. Our target – and the only acceptable target - is that nobody is street homeless.

Over the last four years, this is something that we have moved ever closer to achieving. Our partnership of housing, health, social care and support services has reduced the number of people on our streets by more than 75 per cent. And in 2020/21 we were extremely close to

achieving our aim; the unique circumstances created by Covid-19 led to a situation where we had access to the funding needed to offer everyone a route off the streets, to mobilise a broader range of partners, and support from all levels of government to offer this help to everyone who needed it, regardless of immigration status, priority need or any other criterion. When government funding was withdrawn in July 2021, we committed our own resources to sustain the accommodation and support we had provided to ensure that everyone who was offered emergency accommodation during the pandemic could be supported to find somewhere long-term to move on to. This demonstrates that with the right resources and political will, nobody needs to be street homeless.

Our challenge now is sustaining this.

We will do this by:

- Providing homelessness prevention support at critical moments, such as when someone is leaving prison, accessing drug or alcohol treatment, or at hospital discharge.
- Setting aside some council housing to be used as ‘Housing First’: providing suitable accommodation alongside specialist support to help people to maintain settled tenancies.
- Taking a direct approach to building and providing supported accommodation to enable people who have experienced rough sleeping to regain their confidence and tenancy skills after a time on the street.
- Ensuring that housing for people who have experienced rough sleeping is accompanied by specialised support, to ensure that people are able to transition to settled accommodation.
- Ensuring that we work in partnership with private, community and faith-based providers of night shelter and hotel accommodation to ensure people can access good quality support and housing if they find themselves street homeless
- Reinstating the Council’s directly delivered night shelter provision by utilising vacant properties, or by acquiring or building new accommodation to meet this ongoing need.
- Providing support that helps people tackle the range of issues and experiences that lead to homelessness, which look different for everyone. We will do this via the commissioning and delivery of accommodation and other support service, including our pioneering resource centre at Mulberry Junction, where people can access help and advice from a range of specialist organisations and council teams around their health, housing, money and immigration status.
- Delivering training and other resources, to Council teams and other organisations working in the borough, to ensure professionals have access to the latest best practice in supporting vulnerable homeless adults and are confident about what to do if they think that someone is sleeping rough.

4.4 Ensuring that we are making the best and fairest use of our housing stock

There are a number of triggers for all sorts of homelessness. At its root is the shortage of suitable housing: housing which is affordable, stable and which meets its residents' specific needs. That is why Haringey has an ambitious Council Housing Delivery Programme and an offer of social housing is the only realistic long-term, secure, solution for many of our households in temporary accommodation.

We are committed to ensuring that social housing in the borough goes to those who need it the most; and that it is allocated quickly and effectively. We do this through our housing allocations policy. We will bring forward a new housing allocations policy to ensure that it continues to meet these overall objectives.

Our new allocations policy will build on our current policy, and we are proposing to maintain a banding system. In order to ensure that we continue to make the best and fairest use of our housing stock, and with a 20 per cent increase in Council housing projected by 2031, we will also ensure that the new allocations policy:

- Has a clear interface with the Council Housing Delivery Programme, so that the programme takes a needs-based approach
- Continues to help and incentivise existing tenants who want to move to a smaller home – and in doing so allows their larger homes to be allocated to the larger households who need them
- Ensure that those who in severe housing need are able to access suitable housing quickly and efficiently.

Glossary

Affordable Housing is a broad category covering all homes for rent or sale below market rates. This includes homes let at Social Rent, London Affordable Rent, and Intermediate Rent. It also includes homes for sale on a Shared Ownership basis or as Discounted Market Sale.

The **Haringey Community Benefit Society** is a not-for-profit organisation which has charitable objectives and is registered with the Financial Conduct Authority. The Haringey Community Benefit Society is a separate organisation from the Council, with an independent board and was set up to provide affordable homes to people nominated by the Council because they are homeless or in housing need, with rent set at, or below, the local housing allowance level..

First Homes are new homes sold with a discount of at least 30 percent. They will be prioritised for first-time buyers, serving members and veterans of the Armed Forces, and key workers such as nurses, police, and teachers. The government has said that at least 25 per cent of all homes delivered through section 106 agreements must be sold as First Homes.

Houses in Multiple Occupation, or **HMO**s, are buildings or flats in which two or more households share a basic amenity such as bathroom, toilet or cooking facilities. The Housing Act 2004 also classifies other categories of buildings as HMOs: buildings that have been converted into flats that are not all self-contained; and converted block of flats where the conversion does not meet building standards and fewer than two-thirds of the flats are owner-occupied. Landlords must get a licence from the Council for any HMO that is occupied by three or more separate households. Converting any building to a HMO for seven or more occupants requires planning permission, and in the east of Haringey planning permission is required for HMO conversions for three or more occupants.

Intermediate Rent is set above Social Rent but below the rents charged by private landlords. New intermediate rent homes funded by the GLA must since 2016 be let at London Living Rent which is set at a third of local household median incomes and adjusted for the number of bedrooms in each home. Tenants are expected to use the savings made against market rents towards a deposit for a Shared Ownership home. Like Shared Ownership homes, London Living Rent homes are not let through a local authority's housing register. The Council does not currently deliver any homes of this kind.

The Local Plan. All Local Planning Authorities must produce a Local Plan. The Local Plan is a document that sets out the vision and objectives for future development of the borough. It provides a positive strategy and policies to enable significant growth such as new homes, employment, leisure and cultural facilities and infrastructure, while protecting and enhancing heritage and natural environment. The Local Plan is used to decide planning applications for new buildings and changes of use in the borough. In London, the Local Plan must be in 'general conformity' with the London Plan, ensuring that the planning system for London operates in a joined-up way and reflects the overall strategy for how London can develop sustainably.

London Affordable Rent was introduced by the Mayor of London in 2016 for new affordable homes in London and is set at the Social Rent Cap increased every year by one percentage point more than inflation. It aimed to replace the delivery of Affordable Rent homes in London. The 2021 GLA funding round no longer refers to London Affordable Rent, so the tenure will slowly be phased out for new homes.

Registered Provider. Any organisation that provides social housing must be registered by the Regulator of Social Housing. This includes councils, housing associations, and housing co-operatives: if they provide social housing and are registered with the Regulator, they are a registered provider. In this context, **social housing** means any low-cost rental accommodation and low-cost home ownership accommodation as defined by the Housing and Regeneration Act 2008. The Regulator of Social Housing sets consumer and economic standards for social housing providers and can take action if these are breached.

Section 106 of the Town and Country Planning Act 1990 gives Local Planning Authorities powers to make developers provide affordable housing as part of their developments. They are reached through a process of negotiation that takes into account the financial viability of each scheme. They are commonly known as s106 agreements or planning obligations.

Social Rent can be charged by councils or housing associations. Since 2002, Social Rents have been calculated using a statutory formula that works out individual rents in relation to the relative value of the home, relative local earnings, and the number of bedrooms. There is a nationally set cap above which Social Rents can never go. The Council is committed to delivering its new Council homes at Social Rent. Social Rent is sometimes also known as Formula Rent, Target Rent, or Council Rent.

Statutory homelessness – Councils have a duty under the law to ensure that advice and assistance is available free of charge to households who are homeless or threatened with homelessness. Within this, councils have a statutory – or legal - duty to provide accommodation to some homeless people. Homelessness where a council has this duty to provide accommodation is described as 'statutory homelessness'. The statutory duty only exists when a council is satisfied that a homeless person is eligible for assistance, unintentionally homeless and falls within a specified priority need group. Eligibility for assistance depends largely upon immigration status. Priority need applies when an applicant has dependent children or is in some way vulnerable.

Supported Housing is specially designed and designated housing where support is provided by trained staff to residents who have a range of different housing support needs. Unlike residential or nursing care, residents of supported housing will not require on-site personal or nursing care and will not always be in receipt of an adult social care package. Supported housing includes, for example, sheltered housing, which is specifically for older people with additional needs; hostels, which are for people experiencing homelessness; refuges, which are for people fleeing abuse and violence; supported living, which is for learning disabled adults and those with complex mental health needs; and foyers for homeless young people and care leavers.

Temporary Accommodation is a category of housing provided by a council either while it investigates a homelessness application, or when it has confirmed that it has a duty to provide settled housing under Part 7 of the Housing Act 1996. That legal duty applies then somebody is homeless but has not made themselves homeless deliberately and is also in priority need because they have dependent children or are in some way vulnerable. Temporary accommodation can be far from 'temporary': many people live in it for many years until suitable settled accommodation becomes available. Temporary accommodation provided on an emergency basis while a homeless application is investigated is also called 'interim' or 'emergency' accommodation, and it might include hostel or hotel accommodation. Once the Council accepts a duty to provide housing temporary accommodation is usually self-contained.

Equality Impact Assessment (EQIA)

The Equality Impact Assessment (EQIA) form is a template for analysing a policy or proposed decision for its potential effects on residents with protected characteristics covered by the Equality Act 2010.

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 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.

Although it is not enforced in legislation as a protected characteristic, Haringey Council recognises the profound and far-reaching impacts of socioeconomic disadvantage treats socioeconomic status as a local protected characteristic.

1. Responsibility for the Equality Impact Assessment

Name of proposal:	**Draft Housing Strategy 2022-2027**
Service Area:	**Housing**
Officer Completing Assessment:	**Hannah Adler / Marc Lancaster**
Equalities/HR Advisor:	**Jim Pomeroy**
Cabinet meeting date (if applicable):	**8 March 2022**
Director/Assistant Director	**David Joyce / Robbie Erbmann**

2. Executive summary

Please complete this section *after* completing the rest of the form and summarise:

The proposal is for a new Housing Strategy for Haringey, to run from 2022-2027. The Housing Strategy is a wide-ranging document which covers a number of housing issues and sets out the Council's approach to addressing these issues.

The strategy comprises 4 strategic objectives, covering the following areas:

- *Delivering the new homes Haringey needs*
- *Improving housing quality and resident services in the social housing sector*
- *Improving the quality of the private rented sector*
- *Preventing and alleviating homelessness*

The proposals under each of these objectives are set out below. However, this is a draft strategy, and the next stage is a period of consultation and engagement with residents and stakeholders. Following this, and based on responses to the consultation, a final strategy will be prepared.

1) *New homes*
    a. *Firstly, the Strategy sets out an overall target of 1592 new homes per year. This is in accordance with the Mayor of London's London Plan.*
    b. *Secondly, the Strategy notes the preferred types of affordable housing in Haringey, based on a Strategic Housing Market Assessment. There is a strong preference for affordable housing to be developed as housing for affordable rent, not affordable sale. Within this, there is a strong preference for homes at social rent, as opposed to other forms of affordable rented housing.*
    c. *Thirdly, the Strategy sets out the required mix in terms of house size. The preferred mix for social rented housing considers both the longer-term needs of the borough alongside the shorter-term needs identified from the Council's housing register. The required mix for intermediate rented housing and for intermediate home ownership is also set out.*
    d. *Fourthly, the Strategy commits to continuing with a major new Council Housing Delivery Programme.*

2) *Social rented sector*
    a. *The Strategy commits to wide ranging improvements in the social rented sector.*
    b. *For the Council's own homes, tenants and leaseholders, this includes commitments to major works and to bringing all homes up to decent homes standard, to improving services to tenants, and to the greater involvement of residents in decision making. It also sets out the Council's intention to bring housing management services back in-house and to take this opportunity to better integrate services.*
    c. *The Strategy also commits to continued close working with other registered providers of social housing in Haringey, to ensure improvements across the whole sector.*

3) *Private rented sector*
    a. *The Strategy commits to improving the private rented sector and providing support to tenants in the private rented sector in three ways.*

Firstly, the Strategy commits to the continuation of existing licensing schemes and to the implementation of new licensing schemes and to measures that will support landlords to understand and meet their responsibilities.

b. *Secondly, the Strategy commits the Council to using its enforcement powers to take action where landlords are failing to meet standards, and to bring empty homes into use where possible.*
c. *Finally, the Strategy commits to providing a broad range of support to tenants in the private rented sector – both through its own services as well as by signposting to partners in the borough. It also commits to communicating private tenants' rights and responsibilities more clearly.*

4) *Preventing and alleviating homelessness*
   a. *The Strategy commits to continuing the Council's work preventing homelessness as far as possible, by intervening early and working with residents to resolve issues which could lead to homelessness.*
   b. *The Strategy sets out the Council's preferred accommodation options to prevent households becoming homeless, or to use as temporary accommodation for households who are homeless. It also commits to broader support for households living in temporary accommodation.*
   c. *The Strategy sets out the Council's commitment to supporting people who are, or are at risk of, sleeping rough.*
   d. *The Strategy sets out high level principles for a new housing allocations policy (a separate policy document which will be agreed by Cabinet and accompanied by an EQIA).*

The overarching aim of the housing strategy is to ensure that all Haringey residents have a safe, stable and secure home. To that end, it is a strategy which concerns all residents in the borough. However, different strategic approaches will be taken for different groups of residents, who can broadly be grouped according to their housing tenure.

The first strategic objective concerns the new homes to be delivered in the borough over the next 5-year period. While the overall number of new homes is set out in the London Plan, with the Local Plan setting out where these homes will be built – and the expected percentage of affordable housing in new development – the Housing Strategy specifically:

- *Sets out a clear preference for social rented housing over other kinds of affordable housing, while making it clear that all affordable housing is welcomed. This means there is a preference for social housing over other forms of affordable rented housing (e.g. intermediate rent) as well as affordable home ownership (e.g. shared ownership or first homes). This means that the Strategy is prioritising the needs of those who need social rented housing over those*

who need other forms of affordable housing. This decision is taken on the basis of clear evidence from the Strategic Housing Market Assessment, but needs to be noted and considered.

- *Sets out the desired breakdown of affordable homes of various types by bedroom size. There is an emphasis on providing more family sized social rented homes (which means fewer 1-bedroom homes). This is based on an analysis of existing supply and existing and projected need.*
- *In the affordable home ownership sector, there is an emphasis on more 1-bed homes because larger affordable homes for ownership become unaffordable to those who are eligible for them. This means that some households who do not qualify or are not a priority for social housing but will struggle to buy market housing may be disadvantaged. However, this is to a great extent due to the high cost of affordable home ownership for larger homes.*

With regard to the second strategic objective, the broad aims are around improving the quality of housing the council owns, as well as the services provided to tenants and leaseholders. These will benefit council tenants and leaseholders. There is also a commitment to work to improve the social housing sector as a whole, which will benefit all social tenants in the borough. The commitments to tenants of other social landlords are less wide-ranging than to council tenants since the Council has the powers and resources to improve its own stock.

With regard to the third strategic objective, the broad aims are firstly to improve the quality of housing in the private rented sector in the borough by providing guidance and support to private landlords and by using the full range of the Council's powers to license and enforce standards, and secondly to provide more support to residents in this sector. These objectives are designed to benefit people living in the private rented sector.

With regard to the fourth strategic objective, the broad aims are around preventing people from becoming homeless by providing them with early and targeted support, ensuring that people who become homeless and are in priority need are provided with accommodation to suit their needs and broader wrap-around support, supporting those at risk of rough sleeping, and setting out broad principles for a new housing allocations policy. These objectives are designed to support some of the borough's most vulnerable people – those who are already homeless or at risk of becoming so, and those who are sleeping rough or at risk of sleeping rough. With regard to the last objective, the Council's housing allocations policy sets out who is prioritised for social housing. This is an important policy with important equalities' considerations, and when the new policy is brought forward (initially for consultation) it will be accompanied by a full equalities' impact assessment.

The Housing Strategy can therefore be understood as prioritising the needs of the following groups of residents:

- *Those who need social rented housing; i.e. those who are currently on the housing register*

- *Those who already live in social rented housing*
- *Those who live in the private rented sector*
- *Those who are homeless, and at risk of homelessness*
- *Those who are rough sleeping, or at risk of rough sleeping*

By stating a clear preference for social rented housing over other types of affordable housing, in particular affordable home ownership, the Housing Strategy has prioritised the needs of those who need social rented housing over those who are not prioritised for social rented housing but cannot afford market housing. This group is most likely to live in the private rented sector, so by striving to improve this sector the Housing Strategy addresses their immediate housing situation rather than that which they aspire to. It is worth noting that planning policy requires a percentage of homes to be delivered as intermediate housing so this will still be provided. And it is likely that a majority of the new homes built in the borough will be for private sale which will support some, but not all, aspiring homeowners.

With regard to the needs of existing owner-occupiers, with or without mortgages, the housing strategy does not propose any new policies. This is primarily due to the lack of levers or powers the Council can exercise in this area, and the fact that this group already live in secure housing which they are likely to be able to afford.

3. Consultation and engagement

3a. 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?

Consultation and engagement will significantly inform the final Housing Strategy and allow us to assess and if necessary further mitigate its impact on protected groups of residents.

The Housing Strategy will be subject to a statutory consultation as well as more in-depth engagement and participation with residents. Data on consultees and on residents engaging and participating in strategy development will be collected and considered as part of responses to the consultation and broader engagement and participation. The Council's Equality Monitoring guidance will be followed.

3b. 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

Tbc – following consultation

4. Data and Impact Analysis

Please consider how the proposed change will affect people with protected characteristics.

4a. Age

Data
Borough Profile[1]
56,718: 0-17 (21%)
72,807: 18-34 (27%)
68,257: 35-49 (25%)
44,807: 50-64 (17%)
28,632: 65+ (11%)

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

A combination of council-held data, the census and studies showing national and regional trends.

Detail the findings of the data.

13.5% of homeowners are aged 65 or over – more than the borough average population and more than live in any other tenure [2]. This matches more recent data showing that while London's home ownership rate has fallen in recent decades, there are stark differences in the trends for different age groups. Home ownership has fallen for all age groups other than the over 65s, and most sharply for people aged under 35: in 1990, 25% of households in London headed by someone aged 16-24 and 57% of households headed by someone aged 25-34 owned their home. However, by 2019 these figures had fallen to 5% and 29% respectively. [3]

60% of private renters are aged between 25 and 49 – far more than the population in general (46.1%), and significantly more than in any other tenure. [4]

Just 2.2% of private renters are aged over 65 and 5.4% are aged between 50 and 64[5]. More recent London-wide data shows that while private renters still tend to be younger, there has been an increase over the last decade in the number older private renters, with 10% now aged between 55 and 64.[6]

[1] Source: State of the Borough
[2] 2011 Census
[3] Housing in London 2020 The evidence base for the London Housing Strategy – GLA
[4] 2011 Census
[5] 2011 Census
[6] English Housing Survey 2019-20

9.7% of social renters are aged 65 or over, a slightly higher rate than for the population (8.6%).[7]

Haringey Council tenants are much older than the borough in general, with 69% aged over 50, 40% aged over 60, and 20% aged over 70.[8]

76% of households on the housing register are aged under 50. However, 30% of those in the most urgent need are aged over 60 years.[9]

Impacts

Older people are far more likely to be homeowners than younger people. It is arguable that younger people aspiring to homeownership but unable to afford market prices are not supported in this by the housing strategy, since the housing strategy states an explicit preference for social rented housing over affordable home ownership. However, affordable home ownership will still be delivered in Haringey; and the challenges of home-ownership for younger people need to be addressed nationally. Additionally, delivering new social housing benefits the 76% of households on the housing register who are aged under 50.

Younger people are more likely to live in the private rented sector, although the number of older people in the private rented sector is also growing. By seeking to improve conditions in the private rented sector, the housing strategy will benefit people across all age groups.

Older people are disproportionately represented among council tenants. By seeking to improve the condition of council owned stock, as well as services provided to council tenants, this group will be supported by the housing strategy. By increasing the housing stock, younger families will be given more opportunity to move into a suitably sized and affordable home.

There is therefore both a positive and negative impact on people who share this protected characteristic.

4b. Disability[10]

Data

Borough Profile [11]

4,500 people have a serious physical disability in Haringey.
19,500 aged 16-64 have a physical disability this equates to approximately 10% of the population aged 16-64.
1,090 people living with a learning disability in Haringey.
4,400 people have been diagnosed with severe mental illness in Haringey.

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[7] 2011 Census

[8] HfH data

[9] HfH data

[10] In the Equality Act a disability means a physical or a mental condition which has a substantial and long-term impact on your ability to do normal day to day activities.

[11] Source: 2011 Census

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

A combination of council-held data, the census and studies showing national and regional trends.

Detail the findings of the data

12.8% of Haringey homeowners are limited in their day-to-day activities by disability or serious illness compared to 13.7% of the Haringey population. 46.2% of disabled homeowners are aged under 65.[12]

Only 7.6% of private renters are limited in their day-to-day activities by disability or serious illness compared to 13.7% of the Haringey population.[13]

23.0% of social renters are limited in their day-to-day activities by disability or serious illness – far more than the 13.7% of Haringey population. 72% of social renters affected by disability or serious illness are aged under 65.[14]

33% of Council tenants have a disability. 32% of those in the most urgent need on the housing register have a disability.[15]

Impacts

Social tenants, and in particular council tenants, are more likely to be limited in their day-to-day activities by a disability or illness. The housing strategy seeks to address this in two key ways: firstly, by seeking to improve the condition of council owned stock and services provided to council tenants; secondly by taking a needs-based approach to the delivery of new council housing to ensure that new housing meets the needs of those on the housing register with a disability, as well as by ensuring that supported housing is delivered as part of the overall supply of new housing in the borough.

The proposed strategy will have both a positive and a neutral impact on people who have a disability, depending on housing tenure.

4c. Gender Reassignment[16]

Data

Borough Profile

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[12] 2011 Census

[13] 2011 Census

[14] 2011 Census

[15] Homes for Haringey data

[16] Under the legal definition, a transgender person has the protected characteristic of gender reassignment if they are undergoing, have undergone, or are proposing to undergo gender reassignment. To be protected from gender reassignment discrimination, an individual does not need to have undergone any specific treatment or surgery to change from one's birth sex to ones preferred gender. This is because changing ones physiological or other gender attributes is a personal process rather than a medical one.

There is no robust data at Borough level on our Trans population, however the central government estimates that there are approximately 200,000-500,000 Trans people in the UK. Assuming an average representation, this would mean between 800 and 2000 Haringey residents are Trans.[17]

Detail the findings of the data.

As noted above, we have no further data with regard to gender reassignment. We do know that 25% of young people who are rough sleeping are LGBT.

Impacts

The housing strategy's aim is that everyone is Haringey has a safe, stable and secure home; including residents who identify as trans. Additionally, the strategy has as a fundamental principle co-producing services and policy with residents, including residents who are often unrepresented in consultation and engagement exercises.

By seeking to improve support to people who are, or are at risk of, rough sleeping, the housing strategy should have a positive impact on this group in which LBGT people are overrepresented.

The proposed strategy will have both a positive and a neutral impact on people who are trans.

4d. Marriage and Civil Partnership

The housing strategy makes no distinction between those who are married and those who are in a civil partnership so there is no likelihood of either married couples or couples in a civil partnership being disproportionately affected.

4e. Pregnancy and Maternity

Data

Borough Profile [18]
Live Births in Haringey 2019: 3646

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

17 Trans is an umbrella term to describe people whose gender is not the same as, or does not sit comfortably with, the sex they were assigned at birth.

18 Births by Borough (ONS)

A combination of council-held data, the census and studies showing national and regional trends.

Detail the findings of the data.

2% of households moving into social housing in London included a pregnant woman[19]. The Labour Force Survey for the same year (2019-20) does not report the proportion of all households in London that include a pregnant woman, but it does say that 3% of households have one or more children aged under 12 months.

The share of households with children has varied little for households that own their home outright (from 13% in 2004, to 14% in 2020) and has risen for households that are buying with a mortgage (from 44% in 2012 to 51% in 2020).[20]

31% private renting households in London include children, up from one in five in 2004. [21]

The share of households with children in Haringey has fallen slightly for social renting households (from 43% to 38%) in 2020).[22]

Impacts

The housing strategy seeks to provide housing for Haringey's families, in particular by increasing the percentage of social rented homes delivered as larger homes.

The housing strategy sets the breakdown of affordable home ownership towards one-bedroom homes. This is because larger homes for ownership become too expensive for qualifying households to buy. This could have a negative impact on some people who are pregnant or with young children who cannot afford market housing.

It also seeks to improve conditions in the private rented sector in general, a sector housing a growing number of households with children.

The proposed strategy will have both a mostly positive impact on people who are pregnant or who have young children, although a potentially negative impact on those who aspire to affordable home ownership.

4f. Race

[19] CORE lettings data, MHCLG 2019
[20] Labour Force Survey household data, 2020
[21] Housing in London 2020 The evidence base for the London Housing Strategy – GLA
[22] Labour Force Survey household data, 2020

Data

Borough Profile [23]

Arab: **0.9%**
Any other ethnic group: 3.9%

Asian: **9.5%**
Bangladeshi: 1.7%
Chinese: 1.5%
Indian: 2.3%
Pakistani: 0.8%
Other Asian: 3.2%

Black: **18.7%**
African: 9.0%
Caribbean: 7.1%
Other Black: 2.6%

Mixed: **6.5%**
White and Asian: 1.5%
White and Black African:1.0%
White and Black Caribbean: 1.9%
Other Mixed: 2.1%

White: **60.5% in total**
English/Welsh/Scottish/Norther Irish/British: 34.7%
Irish: 2.7%
Gypsy or Irish Traveller: 0.1%
Other White: 23%

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?
A combination of council-held data, the census and studies showing national and regional trends.

Detail the findings of the data

72.3% of homeowners in Haringey are white. This includes 51.4% who are white British, 4.6% white Irish, and 16.2% who are white and not British. 52.9% of white British household heads in Haringey own their own home. [24]

27.7% of homeowners are from a BAME group - 12.3% of homeowners are Black, 9.8% are Asian, 2.9% are mixed and 2.8% are another BAME ethnicity.

[23] Source: 2011 Census
[24] Census 2011

48.6% of Asian household heads in Haringey own a home, 29.4% of multiple or mixed ethnicity, 27.3% of a Black ethnicity, and 25.8% of another BAME ethnicity.

People who are white and not British are significantly over-represented in Haringey's private rented sector, where they form the largest group: 34.7% of private renters define as white other (compared to 26.3% of the Haringey population), 33.5% as white British, and 2.7% as white Irish. 51.3% of household heads who define as white other in Haringey rent privately, 28.2% of white British, and 22.7% of white Irish.

People from BAME backgrounds are under-represented in Haringey's private rented sector: 29.1% of private renters are BAME compared to 34.5% of the household population. The 2011 private renting population included 4.1% who define as mixed/multiple ethnic groups, 7.3% as Asian/Asian British, and 12.5% as Black/African/Caribbean/Black British. The only BAME group over-represented in the private rented sector defines their ethnicity as other than Black, mixed, or Asian – 6.4% of private renters belong to this group while making up just 4.3% of the population. [25]

Haringey Council tenants are disproportionately from BAME backgrounds. A third identify as Black. Council tenants who are young, Black, Bangladeshi, or women are much more likely to live in overcrowded households. 60% of severely overcrowded households are Black. [26]

4% Of Council tenants are White Kurdish, 6% White Turkish, 3% White Turkish Cypriot, and 1% White Greek Cypriot. 19% are white British. [27]

Just 10% of households on the housing register are white British. 62% are BAME. [28]

61% of households in temporary accommodation are from BAME groups. 43% of residents accepted as statutory homeless are black. [29]

25% of people experiencing rough sleeping in Haringey are Black, 19% are white British, and 42% white and not British. [30]

Impacts

The housing strategy will have a positive impact on those living in council housing, who are disproportionately from BAME backgrounds.
Delivering more council housing will benefit those on the housing register, on which black households are very overrepresented.
Delivering more family sized housing will benefit overcrowded council tenants, who are more likely to be Black or Bangladeshi.

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[25] Census 2011
[26] HfH data
[27] HfH data
[28] HfH data
[29] HfH data
[30] State of the borough

People who are white and not British are significantly over-represented in Haringey's private rented sector, so improving this sector will benefit this group.

The proposed strategy will have both a positive and a neutral impact on people who share a protected characteristic related to race.

4g. Religion or belief

Data

Borough Profile [31]
Christian: 45%
Buddhist: 1.1%
Hindu:1.9%
Jewish:3%
Muslim: 14.2%
No religion: 25.2%
Other religion: 0.5%
Religion not stated: 8.9%
Sikh: 0.3%

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

Census data [32]

Detail the findings of the data

46.9% responding to the census question identified as Christian, 27.1% stated that they had no religion,11.2% as Muslim, 2.4% as Jewish, 1.6% as Hindu, 1.2% as Buddhist, and 0.3% as Sikh.

Significantly higher proportions of people identifying their religion as Jewish (4.1% of homeowners) and Hindu (2.4%) own their own home compared to their overall share of the borough's population. Muslims are significantly less likely than other religious groups to own their home.

People with no religion are more likely to rent privately – 31.2% of private renters say they have no religion compared to 25.2% of the borough as a whole. Apart from Buddhists, who are slightly more likely to rent privately than to live in other tenures, all religious groups are under-represented in the private rented sector.

[31] Source: 2011 Census
[32] Source: 2011 Census

Muslims are much more likely to rent from a social landlord – 19.6% of social renters identify as Muslim, compared to 14.2% of the borough as a whole. Christians are a little more likely to rent from a social landlord – 53.1% of social renters give their religion as Christianity.

Impacts
The proposed strategy will have a mostly neutral impact on people who share a protected characteristic related to religion and a positive impact given the increased likelihood of people who are Muslim renting from a social landlord.

4h. Sex

Data
Borough profile [33]
Females: (50.5%)
Males: (49.5%)

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?
A combination of council-held data and the census.

Detail the findings of the data

Women and girls are slightly more likely to live in owner-occupied homes than men or boys – while they make up 50.5% of the population, they make up 51.2% of residents in owner-occupied homes. [34]

Women and girls are less likely to live in Haringey's private rented sector than men or boys – while they make up 50.5% of the population, they make up 47% of residents in the private rented sector. [35]

Women and girls are more likely to live in Haringey's social rented sector than men or boys – they make up 54% of residents in the social rented sector. [36]

64% of people holding a Council tenancy are women. 63% of households on the housing register are comprised of, or are headed by, women. [37].

11,285 households are waiting for social housing on the housing register. Two thirds of them are households headed by women. [38].

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[33] Source: 2011 Census
[34] 2011 census
[35] 2011 census
[36] 2011 census
[37] HfH data
[38] HfH data

In Haringey, only 15% of people experiencing rough sleeping were women. The average age of death for women who experience rough sleeping is 42 years; for men it is 44.[39].

Impacts

Women are overrepresented in the social housing sector and particularly the council housing sector. They are also overrepresented on the housing register. By seeking to improve social and in particular council housing in the borough; and by delivering new council homes to let to households on the housing register, the housing strategy should have a broadly positive impact on this group of women.

Fewer men live in the social housing sector and fewer men are on the housing register, meaning that this group are less likely to benefit from the delivery of new Council housing.

4i. Sexual Orientation

Data

Borough profile [40]

3.2% of London residents aged 16 or over identified themselves as lesbian, gay or bisexual in 2013. In Haringey this equates to 6,491 residents.

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

We do not have reliable data on sexuality by tenure.

We do know that 25% of young people who are rough sleeping are LGBT.

Impacts

The housing strategy's aim is that everyone is Haringey has a safe, stable and secure home; including residents who identify as lesbian, gay and bisexual. Additionally, the strategy has as a fundamental principle co-producing services and policy with residents, including residents who are often unrepresented in consultation and engagement exercises. By seeking to improve support to people who are, or are at risk of, rough sleeping, the housing strategy should have a positive impact on this group in which LBGT people are overrepresented.

4j. **Socioeconomic Status (local)**

[39] State of the Borough
[40] Source: ONS Integrated Household Survey

Data

Borough profile

Income[41]

Haringey is the 4th most deprived in London as measured by the IMD score 2019 (where 1 = most deprived). The most deprived LSOAs (Lower Super Output Areas or small neighbourhood areas) are more heavily concentrated in the east of the borough.
22.4% of the population in Haringey aged 16-65 receive Universal Credit as of March 2021.
29% of employee jobs in the borough are paid less than the London Living Wage.
The average wage of someone working in Haringey is £30,452 per year and the average resident wage (including people who travel out of the borough for work) is £35,769 per year.

Educational Attainment[42]

While Haringey's proportion of students attaining grade 5 or above in English and Mathematics GCSEs is higher than the national average, it performs worse than London.
5.5% of Haringey residents have no qualifications.

What data sources will you use to inform your assessment of the impact of the proposal on people under this protected characteristic?

A combination of council-held data, the census and studies showing national and regional trends.

Detail the findings of the data

The average price for a home in Haringey is £585,338 – more than the London average[43] and 16 times the median Haringey salary. The median income for employees living in the borough is £36,561. [44]

London's private renters reflect the income distribution of the wider population. 58% of private tenants are in the top two fifths of the national household income distribution and 14% are in the bottom fifth. A quarter of private renters nationally said they found it difficult to afford their rent. [45]

[41] Source: Annual Survey of Hours and Earnings, ONS, 2019
[42] Source: Annual Population Survey 2019 (via nomis)
[43] Land Registry Data - UK House Price Index. January 2022
[44] ONS annual survey of hours and earnings - resident analysis 2021 (via NOMIS Labour Market Profile)
[45] EHS 2019-20

In 2019-20, 60% of private renters reported having no savings. Nearly half of private renters do not expect to ever own a home. [46]

A fifth of private renters in Haringey - 7,800 households - are in receipt of Housing Benefit. [47]

Two thirds of Council and Housing Association tenants have a household income less than £20,000 a year. [48]

There are significant gaps in healthy life expectancy between populations in Haringey: the gap in healthy years of life between richest and poorest deciles is 15 years for men and 17 years for women.

Impacts

By prioritising the new supply of the most affordable housing (social rented housing), the housing strategy supports the borough's poorest residents to access secure and safe housing.
By improving conditions in social housing, the housing strategy will improve the housing of some of the borough's poorest residents.
By improving conditions in the private rented sector, the housing strategy will improve housing conditions for some of the borough's poorer residents.

5. Key Impacts Summary

5a. Outline the key findings of your data analysis.

The housing strategy is a major strategy which will impact a large number of people in the borough. By improving conditions in social rented housing, in particular council housing, the strategy will have a positive impact on BAME residents, older residents, and women. By providing more social housing and in particular more family sized social housing, the strategy will also support these groups, as well as families with young children.

By not prioritising affordable home ownership, the strategy may have a negative impact on those who aspire to homeownership, who are more likely to be younger.

5b. Intersectionality

- Many proposals will predominantly impact individuals who have more than one protected characteristic, thereby transforming the impact of the decision.

[46] EHS 2019-20
[47] Council data
[48] Housing in London 2020 The evidence base for the London Housing Strategy

- This section is about applying a systemic analysis to the impact of the decision and ensuring protected characteristics are not considered in isolation from the individuals who embody them.
  Please consider if there is an impact on one or more of the protected groups? Who are the groups and what is the impact?

People in housing need and those living in social housing are disproportionately disadvantaged across multiple areas and have more than one protected characteristic, in particular in terms of race, socio-economic status, sex and disability. The Housing Strategy prioritises meeting the housing needs of these groups.

5c. Data Gaps

Based on your data are there any relevant groups who have not yet been consulted or engaged? Please explain how you will address this

TBC following consultation

6. Overall impact of the policy for the Public Sector Equality Duty

Summarise the key implications of the decision for people with protected characteristics.

In your answer, please consider the following three questions:

- 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?

- Will the proposal help to foster good relations between groups who share a relevant protected characteristic and those who do not?

The Strategy will not result in identified direct or indirect discrimination for any group that shares the relevant protected characteristics.

By ensuring that housing inequalities are reduced the Strategy will help to advance equality of opportunity between groups who share a relevant protected characteristic and those who do not.

By improving housing conditions across the borough and ensuring that more people live in good quality and affordable homes, the Strategy will help to foster good relations between groups who share a relevant protected characteristic and those who do not.

7. Amendments and mitigations

7a. What changes, if any, do you plan to make to your proposal because of the Equality Impact Assessment?

Further information on responding to identified impacts is contained within accompanying EQIA guidance

Please delete Y/N as applicable

No major change to the proposal: the EQIA demonstrates the proposal is robust and there is no potential for discrimination or adverse impact. All opportunities to promote equality have been taken. If you have found any inequalities or negative impacts that you are unable to mitigate, please provide a compelling reason below why you are unable to mitigate them

7b. What specific actions do you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty?

Action: tbc following consultation

Lead officer: tbc following consultation

Timescale: tbc following consultation

Please outline any areas you have identified where negative impacts will happen because 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:

Tbc following consultation

7. Ongoing monitoring

Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented.

- Who will be responsible for the monitoring?
- What the type of data needed is and how often it will be analysed.
- When the policy will be reviewed and what evidence could trigger an early revision

- How to continue to involve relevant groups and communities in the implementation and monitoring of the policy?

The next step is monitoring the outcome of consultation and engagement exercises, by the Council's housing strategy team.

Date of EQIA monitoring review:

TBC

8. Authorisation

EQIA approved by (Assistant Director/ Director) **Robbie Erbmann**

Date **25.2.22**

9. Publication

Please ensure the completed EQIA is published in accordance with the Council's policy**.**

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

Report for: Cabinet – 8 March 2022

Title: London Borough of Haringey Proposed Selective Property Licensing Scheme

Report authorised by: Stephen McDonnell, Director of Environment and Neighbourhoods

Lead Officer: Lynn Sellar, Private Sector Housing Manager, 020 8489 5242, lynn.sellar@haringey.gov.uk

Ward(s) affected: White Hart Lane, Northumberland Park, Bruce Grove, Seven Sisters, Tottenham Hale, Tottenham Green, St Ann's, West Green, Harringay, Noel Park, Bounds Green, Woodside

Report for Key/ Non Key Decision: Key Decision

1. Describe the issue under consideration

1.1 Part 3 of the Housing Act 2004 gives Local Authorities the power to designate an area or areas within its district as being subject to selective licensing. Selective licensing is a discretionary licensing tool aimed to assist a Local Authority to regulate the private letting of houses, where there are concerns of anti-social behaviour, low housing demand, poor property conditions, high crime, high levels of deprivation or high migration.

1.2 This report updates Cabinet on the findings of the statutory consultation on selective licensing which ran from 17th May 2021 to 5th September 2021.

1.3 This report seeks a decision from Cabinet to consider whether to authorise the designation of an area as subject to selective licensing when considering the consultation outcomes, evidence, and prescribed criteria within Part 3 of the Housing Act 2004.

2. Cabinet Member Introduction

2.1 More than a third of Haringey's residents rent their home from a private landlord. The number of privately rented homes is increasing so we want to ensure all privately rented homes are decent and safe. The private rented sector provides a much needed and valuable source of accommodation for the wide range of individuals, and increasingly families, that require this type of accommodation.

2.2 We know that poor property conditions make deprivation worse as tenants have fewer choices about where they can live. Fuel poverty, overcrowding and poor living conditions have a detrimental impact on the lives and health of those living in sub-standard accommodation.

2.3 For all these reasons, we are seeking to bring in a new selective licensing scheme within all 12 wards to the east of the borough. This scheme would make it

mandatory for any landlord renting a property to a single-family household or two unrelated sharers to licence this property with the council. This proposed scheme will complement the existing property licensing scheme that we have in place for property rented as Houses in Multiple Occupation, which has been in operation since May 2019.

2.4 It is vital that privately rented properties are effectively regulated to ensure they are safe and compliant with regulations. The landlord licensing scheme proposed in this report provides the regulatory framework to support the many good landlords in Haringey, whilst also providing the powers for officers to tackle those landlords who do not comply.

3. Recommendations

Cabinet is asked:

3.1. To consider the evidence of poor property conditions and deprivation within the private rented sector properties as detailed in Appendix 1.

3.2. To consider the outcome of the consultation and the Council's consideration of those finding in Appendices 3 and 4 with particular note to the proposed removal of designation 2 (Hornsey and Stroud Green Wards) as a result of consultation and analysis.

3.3. To consider the council's strategic approach linking the proposed selective licensing scheme with the Council's wider strategic approach to the private rented sector as set out in paragraph 7.2 of the report.

3.4. To approve the designation of 12 wards – (White Hart Lane, Northumberland Park, Bruce Grove, Seven Sisters, Tottenham Hale, Tottenham Green, St Ann's, West Green, Harringay, Noel Park, Bounds Green, Woodside) as delineated in the map at Appendix 2 – as subject to selective licensing pursuant to Part 3 of the Housing Act 2004, subject to confirmation by the Secretary of State for Department of Levelling Up, Housing and Communities. (DLUHC)

3.5. To approve the proposed licence conditions applying to any selective licence at Appendix 5.

3.6. To approve the proposed fee structure for licence applications made under the selective licensing scheme at Appendix 6.

3.7. To authorise the Director for Environment and Neighbourhoods, in consultation with the Cabinet Member for Housing the authority to: -

(i) Agree the final document requesting confirmation of the selective licensing designation from the Department of Levelling up Housing, Communities (DLUHC) in consultation with the Director.

(ii) Ensure compliance in all respects with all relevant procedures and formalities applicable to authorisation schemes.

(iii) Keep the proposed scheme under review during the designation lifetime and agree any minor changes to the proposed implementation and delivery, including administration, fees and conditions and give all necessary statutory notifications.

(iv) Ensure that all statutory notifications are carried out in the prescribed manner for the designation and to take all necessary steps to provide for the operational delivery of any licensing schemes agreed by Cabinet.

4. Reasons for decision

4.1 There has been significant growth in the Private Rented Sector (PRS) in Haringey over the last 10 years from 23.9% to 40.2 % (Metastreet Ltd ti 2020). This sector offers housing that Haringey values and wants to see as strong, healthy, and vibrant. However, the reality is that many properties within the private rented sector fall short in terms of property condition and its overall management. Our aim is for a better private rented sector that offers security, stability, and decency for its tenants. *(See Appendix 1)*

4.2 It is estimated that of 39,564 properties in the private rented sector in Haringey 11,771 (26.9%) (Metastreet ti 2020) are in poor condition. This is double the national average (13%). In addition, 2,714 complaints have been made to the Council's Private Sector Housing Team, by private tenants regarding poor property conditions and inadequate property management over the last 5-year period. *(See Appendix 1)*

4.3 Haringey is also a borough with high deprivation levels. Deprivation is lack of income and other resources, which together can be seen as living in poverty. Haringey is recorded in the English indices of deprivation 2020 as the 4th most deprived borough in London, and 49th most deprived in England (of 317). Haringey has the highest homelessness duty owed of any London borough, the highest claimant rate of Universal Credit in London and the highest unemployment rate in London at 9.3% (ONS 2021). (Sept 2021). *(See Appendix 1)*

4.4 Haringey has high levels of fuel poverty caused by deprivation, the age and condition of its housing stock. As a direct result of deprivation and poor housing conditions, the PRS suffers from fuel poverty. A consequence of this is that it can contribute to residential carbon emissions. The Council has a commitment through its Affordable Energy Strategy and Haringey Climate Change Action plan to reduce fuel poverty and to be carbon net zero by 2041. We know the PRS makes up just under half the housing stock in Haringey, and PRS landlords are therefore key players in helping to achieve these goals.

4.5 In the proposed designation there are 29,558 total predicted PRS properties (including Houses of Multiple Occupancy (HMOs), of which 4.9% or 1,448 have non-compliant energy performance ratings for the property. As part of the Proposed scheme, we aim to tackle poor energy performance and in turn expect to support those living in fuel poor homes. *(See Appendix1)*

4.6 Selective Licensing is a tool that local authorities can seek approval to use alongside their normal enforcement powers to target specific issues that are

affecting the local authority and its community, as outlined in paragraphs 4.1 to 4.4. Our proposal will seek to use these powers to tackle poor property conditions and deprivation.

4.7 Selective licensing would allow the local authority to regulate landlords to manage this sector more effectively and through the use of licence conditions under S. 80 of the Housing Act 2004 require landlords to take action to improve the quality of the homes they rent and manage those properties more effectively.

4.8 Legislation requires that an area may only be designated if it has a high proportion of property in the private rented sector. Guidance from the Secretary of State provides that this is met where the proportion is higher than the national average, which in England is 19% of the total housing stock. The area must also meet one or more of the following 6 statutory grounds; that it is:

- an area of low housing demand (or is likely to become such an area).
- experiencing a significant and persistent problem caused by anti-social behaviour and that some or all of the private landlords letting premises in the area are failing to take appropriate action to combat that problem.
- experiencing poor property conditions in the privately rented sector.
- experiencing or has recently experienced an influx of migration and the migrants occupy a significant number of properties in the privately rented sector.
- suffering high levels of deprivation affecting those in the privately rented sector.
- suffering high levels of crime affecting those in the privately rented sector.

4.9 In summary

- currently Haringey's PRS sits at an estimated at 40% well above the national average for England which is 19%.
- Almost 27% of PRS property in our borough has poor property condition, this is double the national average of 13%.
- Haringey is the 4th most deprived borough in London and the 49th in England.
- Just under 5% of PRS property in Haringey fails to have a legally compliant Energy Performance Certificate contributing to the high levels of fuel poverty seen in our borough.

Consultation Outcomes

4.10 On 16th June 2020 Cabinet authorised the council to undertake statutory consultation on its proposal to introduce selective licensing on the following statutory grounds: -

- A significant proportion of privately rented property within the area is suffering from poor property conditions.
- There is a significant and persistent problem caused by Anti-Social Behaviour within private rented sector
- The area is experiencing high levels of deprivation.

4.11 The consultation proposal covered two designations

- Designation 1 - included 12 wards all to the east of the borough

- Designation 2 - included 2 wards in the west of the borough, Hornsey, and Stroud Green.

4.12 The Council commissioned M·E·L Research, an independent research company, to deliver the consultation survey and independently analyse and interpret the results. The consultation ran for 16 weeks from 17th May to 5th September 2021. The consultation was extended by 5 weeks to compensate for the impact of Covid-19, to ensure enough time was given stakeholders to consider and respond to communications that were sent out as well as to allow for further advertising towards the end of the consultation to encourage greater take up.

4.13 The consultation sought local views on the proposals including respondents' experiences of issues in the borough around property conditions, deprivation, and anti-social behaviour. Questions were also asked on the licensing conditions and proposed fee.

4.14 A variety of consultation methods were used to allow interested parties to share their views on the proposals and adaptations were made in light of the ongoing COVID-19 pandemic. These included an online survey, a postal survey, remote public workshops, stakeholder interviews, a Freephone number for verbal feedback, and an email address for written feedback and queries. The council promoted the consultation extensively through various communication channels, both within Haringey and beyond, to encourage landlords, tenants, agents, residents, businesses, and other interested parties to get involved.

4.15 In total, the consultation generated 956 survey responses (950 online and 6 postal). 27 people attended three public workshops. Seven stakeholders were interviewed, and 36 individuals or organisations responded with formal written submissions to the consultation.

4.16 In summary,

- 56% of respondents supported the proposal, 67% of whom were residents or tenants.
- 34% disagreed with the proposal of whom 69% of these were landlords or agents.
- 58% of respondents felt the scheme would have a positive impact on the proposed area.
- 43 % felt the proposed scheme would have a positive impact on themselves and or their business.
- Anti-Social Behaviour was seen as less of a concern to participants of the consultation.
- 51% of respondents felt deprivation was a major issue within the proposed area.
- Landlords view the problem of poor housing and deprivation as less of an issue than tenants and residents.

4.17 Responses received during the consultation were analysed in line with the legislation. The consultation survey received hundreds of comments, 35 written responses and feedback from seven stakeholder interviews and in three public

meetings. There were also three written submissions that were submitted following the close of the consultation. The consultation report grouped the comments around the following subject areas:

- Why respondents agreed or disagreed with introducing Selective Licensing
- Comments about the licensing fees
- Comments about discounts that should be removed
- Comments around additional discounts that could be considered
- Comments about the proposed licence conditions and other suggestions

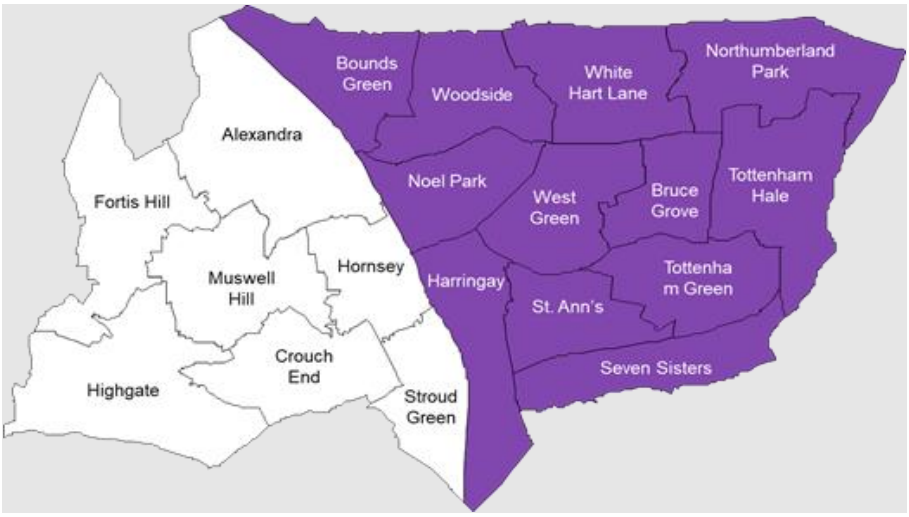
4.18 Analysis of the comments and responses received highlighted some key challenges in relation to the evidence provided for the proposed designations. In particular the data used to evidence the prevalence of Anti-Social Behaviour (ASB) and its persistence across all the wards within the proposed designation was questioned. Some key responses were also received from consultees with regards to the proposed Designation 2. The key theme here was the validity of including Stroud Green and Hornsey in such a scheme, in particular on the criterion of deprivation. There were also challenges with regards to the licence conditions and the Licence Fee. A full outcome of those consideration and the council's response can be found in appendix 4 to this report.

4.19 Having considered the consultee responses, further analysis of the data and evidence were undertaken, and officers considered that the proposals should be modified as follows:

- ASB to be removed as a factor due to the current data not meeting the thresholds for this to be considered a significant and persistent issue within Haringey across the proposed wards.
- Designation 2, containing Hornsey and Stroud Green wards, to be removed from the selective licensing proposal; it could not be sufficiently evidenced that Hornsey and Stroud Green wards meet the threshold for being highly deprived.
- There be no change to the fee structure.
- The Licence Fee discounts to be made clearer as to when they can be applied and by whom.
- The licence conditions have been amended to reflect the changes to the designation criteria e.g., the removal of specific conditions in relation to tackling ASB.
- The Licence conditions have been amended in response to a number of comments from landlords and landlord associations.
    - Removed the condition in relation to providing tenants with quarterly rent statements.
    - Amended the condition regarding the need to gain references for prospective tenants. This is now less onerous for Landlords.

4.20 The selective property licensing proposal will therefore be limited to Designation 1 as shown in the map below, with the objective of:

- Improving housing conditions,
- Seeking to reduce deprivation and inequalities in conjunction with other key council strategies (e.g., Homelessness prevention, housing strategy, borough plan,) and
- contributing to an improvement in the health outcomes of residents in the most deprived areas by improving property conditions and tackling fuel poverty.



Map detailing the proposed licensing scheme designation.

5. Alternative options considered

5.1 **The council could decide to do nothing**. The ageing housing stock in the borough, coupled with the increased demand for private rented accommodation has enabled landlords to rent out sub-standard properties to families who have few options. Doing nothing is not a viable option due to the significant scale of poor housing conditions and poor management of private rented property in the borough. To do nothing would mean continuing to work in the way we currently are which relies on a reactive inspection programme of property. This depends upon complaints being made by tenants as the means of identifying poor conditions.

5.2 The council could continue to rely on Part 1 Housing Act 2004 enforcement powers alone, however this formal action is slow with appeal provisions against most types of notices served, which can significantly delay the time period for compliance. In addition, the council's powers under Part 1 do not enable it to regulate the management of property as licensing schemes do. The Part 1 provisions are currently available to the council but despite our best efforts to exercise these powers that have not provided the necessary large-scale improvements in the sector. All the above options are time consuming, resource intensive and not feasible on a large scale**.**

5.3 **Voluntary Regulation.** The council could rely on voluntary accreditation schemes or landlord membership organisations, such as the National Landlord Association or the Residential Landlords Association. These can help to support and improve a professional approach by landlords, and we have encouraged this by promoting voluntary regulation through voluntary accreditation schemes, but the uptake of the various schemes is low and does not give the council any additional powers to take enforcement action against non-compliance.

5.4 Data from the London Landlords Association and **Accreditation & Training for Landlords and Agents Service** (ATLAS), voluntary accreditation schemes

promoted by Haringey Council has indicated that there are currently 1239 landlords or agents registered. This is amongst the highest registrations across the participating London boroughs. This however has not led to an improved private rented sector in Haringey. The Council also held Landlord Forums pre-pandemic. These forums were attended by landlords and managing agents and were always sponsored by local agents. The forums were always attended by the same landlords and agents who are likely to make up a high percentage of compliant landlords within our borough.

5.5 **Opting for a borough-wide selective licensing scheme.** The data analysis and evidence gathering did not support the need for a borough-wide selective licensing scheme. Part 1 Housing Act 2004 enforcement powers will continue to be used in the areas of the borough that selective licensing does not apply, to ensure compliance.

5.6 **Introducing Selective Licensing in Designation 1 & 2 as per Consultation.** Taking account of the consultee responses and review of evidence the option to include two designations as subject to selective licensing is no longer consider a viable as per paragraphs 4.16- 4.18. Selective licensing will therefore only cover one designation.

6. Background information

6.1 The Government sees the private rented sector as having an important and long-term role in meeting the housing needs of the nation. One of the key powers available to local authorities to improve management practices in this sector is selective licensing, an option taken by an increasing number of authorities to address problems associated with a large proportion of privately rented properties, especially in areas of low income.

6.2 Recent Government White Paper 'Levelling Up the United Kingdom' Published 2nd February 2022, sets out the Government's next stages in their programme to level up the UK. Within this paper there is a commitment to improve the private rented sector. These measures include, by 2030:

- For the number of non-decent rented homes to have fallen by 50%
- To explore a **National Landlord Register**
- To bring forward other measures to reset the relationship between landlords and tenants, including through ending section 21 "no fault evictions".

6.3 Selective property licensing requires all private rented properties within the area (excluding properties falling within certain exemption criteria) to be registered with the authority with an associated fee. The aim of the scheme to drive up standards in the private rented sector. This scheme would support those measures proposed within this White Paper.

6.4 In considering whether to designate an area for selective licensing under one or more of the grounds identified in paragraph 4.8 above, the local housing authority may only make a designation if the area has a high proportion of property in the private rented sector. Nationally, the private rented sector currently makes up 19% of the total housing stock in England.

6.5 In order to introduce selective licensing for poor property condition a local authority must show that a significant number of properties in the private rented sector are in poor condition and are adversely affecting the character of the area/ or the health and safety of the occupants.

6.6 In order to introduce selective property licensing for deprivation a local housing authority area/s must be experiencing a high level of deprivation which affects a significant number of those living in private rented property. That along with other measures the scheme will improve housing conditions in this sector in the designated area.

6.7 If a local housing authority makes a designation that covers 20% or more of its geographical area or that would affect more than 20% of privately rented homes in the local area the authority will need to apply to the Secretary of State for the Department for Levelling Up, Housing and Communities.

6.8 The Housing Act 2004 also requires the local authority to demonstrate the following outcomes as part of its process of delivering a selective licensing initiative:

- Ensure that the exercise of the power is consistent with their overall Housing Strategy.

- Adopt a coordinated approach in connection with dealing with homelessness, empty properties and anti-social behaviour affecting the private rented sector as regards combining licensing with other action taken by them or others.

- Consider whether there are any other courses of action available to them (of whatever nature) that might provide an effective method of achieving the objectives that the designation would be intended to achieve. (As listed within paragraph 5 above)

- Consider that the making of the designation when combined with other measures taken by the authority alone or with other persons will significantly assist them to resolve the problem identified (whether or not they take any other course of action as well).

- Take reasonable steps to consult persons who are likely to be affected by the designations and consider any representations made. (See appendix 3 & 4 full consultation details and outcomes).

6.9 The draft housing strategy 2022-2027 endorses the use of combining the discretionary powers available in the Housing Act 2004, such as selective licensing, with action taken by others to deal with the Council's wider housing related issues. Officers consider that using these measures combined with the council's existing enforcement powers under part 1of the Housing Act 2004, will contribute to the selective licensing objectives of improving property condition, and reducing deprivation. The council's Borough Plan 2019-23 also clearly support the use of discretionary licensing to drive up property standards.

6.10 The introduction of licence conditions as part of this schemes will, in particular, ensure that landlords are fully aware of their obligations and will require landlords

to ensure that properties are properly managed. This is currently not a measure that is available to the council across all private rented properties. The licence conditions will specifically support the scheme's objective to target fuel poverty by asking landlords to produce a compliant energy performance certificate for the property they wish to rent. Any landlord who is non-compliant will be supported to become compliant through grant funds and access to specialist Ecofurb information. Landlords who remain non-compliant will be forced to improve their property.

6.11 The local authority must take reasonable steps to consult persons who are likely to be affected by the designations and consider any representations made in accordance with the consultation. A consultation must run for a minimum of 10 weeks. (Appendix 3 & 4 for full consultation steps and outcomes).

6.12 Article 13(2) of the EU Services Directive (2006/123/EC) requires that the licence fee paid by the applicant must be reasonable and proportionate to the cost of the authorisation (licensing) procedure and shall not exceed the cost of the authorisation procedure. The fee shall not exceed the cost of the licensing scheme. Based on this the proposed fee for a selective licence is £600 for up to five years.

6.13 The fee is levied in two parts. Part A of the fee is for the application for a licence and covers the costs of processing, administration, and validation of the application. Part B of the fee funds the running costs of the scheme, including licensing inspections and enforcement.

6.14 The selective licensing fee is to be set at £600 with the fee split as follows: -

- Part A = £350
- Part B = £250

6.15 Discount of £50 will be applied to each of the following.

- Licence holders who are accredited with a recognised landlord association and or accreditation scheme
- Property that has an EPC certificate for their property showing a rating of A-C. (*See appendix 6 for fee structure*)

6.13 Additional staffing will be required to deliver the selective licensing programme. If Cabinet agrees to this proposal, then income generated from the licence fee will be used to fund a team of officers who will be employed to deliver the selective licensing programme for the duration of the scheme. Officers will investigate the option of including any exit costs in the financial model should the scheme not be renewed at the end of the 5 years.

6.14 If Cabinet agrees to this proposal this will then be subject to confirmation from the Secretary of State for the Department of Levelling Up, Housing and Communities.

7. Contribution to strategic outcomes

7.1. **Borough Plan 2019- 2023-** The proposal to introduce a selective licensing scheme supports the Council's key strategic aims, as outlined in the Borough Plan 2019-2023.

- **Housing Priority**. - It specifically supports the Housing Priority Outcome 3: to 'work together to drive up the quality of housing for everyone' Objective C 'improve the quality of private rented housing and the experience of those living it, including, by expanding landlord licensing and associated enforcement'.
- **People Priority**. -The broader benefits on the health of residents living in these homes supports outcome 7: 'all adults are able to live healthy and fulfilling lives, with dignity, staying active and connected in their communities'.

7.2. **Housing Strategy -** The Council's Draft Housing Strategy 2022-27 outlines the Council's aspirations for to have a safe, stable, and genuinely affordable home. The use of discretionary enforcement powers such as selective licensing is clearly defined as a tool the Council would like to make use of. The strategy includes a specific objective on how we aim to improve the quality of the Private Rented Sector through delivery against three sub-objectives:

- Setting clear standards for the private rented sector and supporting landlords to meet those standards
- Enforcing those standards and taking decisive action against landlords who will not provide their tenants with a home that is decent, safe, and secure
- Empowering and supporting private renters to hold their landlords to these standards.

7.3. **Homelessness Strategy -** The Council's Homelessness strategy is currently under review, however within the Draft Housing Strategy 2022-27 a clear objective for preventing homelessness sets the tone of the Council's strategic direction on homelessness prevention and service delivery. With specific reference to the private housing sector the Homelessness objective identifies that the loss of a tenancy in the private sector is the biggest cause of homelessness, identifying that the Council will use landlord licensing to increase its engagement not only with private landlords but also with their tenants.

7.4. **Empty Homes Policy -** In June 2020 the Council revised its Empty Homes Policy to strengthen and reflect the changes to service delivery and council priorities. The policy sets out a clear direction for how the council will deal with empty homes and the tools that it will use to bring empty homes back into use. The priority for the Council remains with those long-term empty homes that blight the neighbourhood and provide a basis for antisocial behaviour it also acknowledges the need to work in partnership with empty homeowners to understand the reasons why the property is vacant and support them in making decisions to bring that property back into use voluntarily.

7.5. **Affordable Warmth Strategy -** The Affordable Energy Strategy 2022-2025, sets a 5-year plan to reduce fuel poverty in the borough. The strategy identity's risks, mitigation measures and priority actions to help the residents of our borough who are affected by fuel poverty. The use of property licensing has been identified within this strategy's objectives as a tool to help reduce fuel poverty within the

PRS. Educating, providing support and guidance, and working with our landlords as part of the selective licensing project we hope to increase the thermal efficiency of property. We aim to achieve this through a range of measures, principally checking compliance with Energy Performance Certification (EPC) when landlords apply for their licence and taking action where these properties remain non – complaint. We want to use the project to encourage landlords to go beyond the minimum energy requirements for privately rented homes and will sign post landlords to any relevant funding. We will help landlords to identify additional measures that they can do within those properties to increase the energy efficiency and reduce fuel poverty for those living in this sector.

7.6. **Haringey Climate Change Action Plan** – A route map for a net zero carbon Haringey sets out how together we will deliver homes that are healthy, comfortable, and affordable places to heat and power.

8. Statutory Officers comments (Director of Finance (including procurement), Head of Legal and Governance, Equalities)

8.1 **Finance**

8.1.1 The recommendation of the report is to establish a selective licensing scheme in the borough (subject to the consent of the Secretary of State). It is estimated that the scheme will, over the 5 years that it will be in operation, have a total cost of £10.05m. The cost of the scheme will be met from the licence fee. The scheme designation will only come into effect upon 3 months of subsequent application and approval from the Secretary of State.

8.1.2 The scheme is limited to 5 years at which point a new application would need to be made to continue. As per Appendix 6 all of the relevant costs have been considered in respect income generated from Part A & B of the licence fee including exit costs if the scheme was not extended beyond its initial period.

8.2. **Procurement**

8.2.1 N/A

8.3. **Legal**

8.3.1. The Head of Legal and Governance has been consulted in the preparation of this report and comments as follows.

8.3.2. The 3 types of licensing provided for under the Housing Act 2004 are set out in the Background above (paragraph 6.1), and the conditions for designation of an area for additional or selective licensing are set out in Statutory conditions and evidence.

8.3.3. Unless the scheme meets the requirements set by the Secretary of State for a general approval – and the proposed scheme does not - his confirmation is required before a designation of an area subject to selective (s82(1)) licensing can come into force.

8.3.4. Other legal comments are contained in the body of the report.

8.3.5. There is no legal reason why Cabinet should not accept the recommendations in this 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 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 applies to the first part of the duty.

8.4.3. This report seeks a decision from Cabinet to consider whether to authorise the designation of an area as subject to selective licensing. A full Equalities Impact Assessment (EqIA) has been carried out and is attached as an appendix to this report. (Appendix 7)

8.4.4. If the scheme were implemented, it would be likely to have a positive overall equalities impact. In particular, some groups with Protected Characteristics who are disproportionately likely to face significant challenges in the Private Rented Sector (PRS) and/or are overrepresented in the designation area are likely to particularly benefit. This will include young people, people from Black, Asian, and Minority Ethnic backgrounds, women, trans people and those with disabilities.

8.4.5. It is noted that some concerns were raised in the consultation about the potential for the cost of the licensing scheme to be passed onto residents, which would be likely to impact those who are socioeconomically disadvantaged. It is noted that there has been no evidence from other schemes that costs are being passed on and that the licence fee costs for landlords are nominal when broken down on a weekly basis in comparison to the average market rate for rent. It is unlikely that this will financially impact landlords.

9. Use of Appendices

Appendix 1 – Evidence Report
Appendix 2 – Map of designation
Appendix 3 – Consultation Analysis and Outcomes
Appendix 4 – Council's Responses to Consultation
Appendix 5 – Licence Conditions
Appendix 6 – Licence Fee Structure
Appendix 7 – Equalities Impact Assessment

10. Local Government (Access to Information) Act 1985

Not applicable.

London Borough Haringey. Selective Property Licensing

Appendix 1

Evidence Report

Proposed Selective Licensing Scheme

Evidence Report 2021

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1. Introduction

Haringey Council identifies the private rented sector (PRS) as having an important and long-term role in meeting the housing needs of the borough. Many households who would traditionally meet their housing needs in other sectors are now renting privately.

Haringey has seen a significant increase in its PRS, recent data modelling estimates that the borough has just under 44,000 privately rented dwellings. Alongside this growth, Haringey like many other urban boroughs has noted an increase in the prevalence of problems such as poor property conditions, poor landlord management, increased anti-social behaviour (ASB) and correlated deprivation in areas containing high concentrations of privately rented properties.

Haringey Council is focused on improving the management and maintenance of this sector to ensure residents, tenants and professional landlords are protected. Improving property conditions is one of the principal objectives. We are committed to reducing the level of hazards within our PRS dwellings so we can improve the level of decency for our tenants.

One of the key powers available to Council's to improve these practices is selective licensing. An option taken by an increasing number of authorities facing similar challenges to address problems associated with a large and growing PRS, especially in areas of low income and deprivation.

We want to work with landlords to address poor property conditions and help them to comply with our licensing conditions. We will continue to offer support on the professional management of properties through landlord's forums, the council website, in person or online. We will however follow the Council's enforcement policy to target those landlords who choose to flout the law and not comply.

Selective licensing was introduced in Part 3 of the Housing Act 2004. Part 3 of the Act allows local authorities to designate an area of their district as subject to selective licensing for up to five years. Such a designation requires all private rented properties within the area (excluding properties falling within certain exemption criteria) to be registered with the authority for an associated fee.

The council considers that a targeted selective property licensing scheme within the borough would assist the local authority in combating the growing issues that are being experienced in the PRS. The council has seen how licensing schemes can have an advantageous effect on the rented market, help drive up standards for tenants, make landlords and agents more accountable, tackle the minority of criminal landlords and help reduce the burden on council services.

Haringey Council has commissioned data driven research to identify and quantify the distribution PRS properties that exist within our borough, to establish where they are and how this sector impacts on the wider community. The research has been used to identify wards within the borough that are experiencing the most serious problems directly linked to private rented properties.

Haringey Council's preference would be to introduce a borough wide selective licensing scheme to ensure that housing standards across all PRS properties are raised and that all residents are protected. However, Government regulations and guidance for the introduction of selective licensing mandates that local authorities must meet strict criteria before an area can be lawfully introduced.

Based on the research the council has undertaken and our comprehension of the Selective Licensing of Houses Regulations Order 2015 and associated guidance, Haringey Council has decided to consult on a proposal to introduce selective licensing to private rented properties within the following 14 wards out of the borough 19 total wards, comprised of 2 separate designations, including.

- Northumberland Park
- White Hart lane
- Bruce Grove
- Seven Sisters
- Tottenham Hale
- Tottenham Green
- West Green
- St Anns
- Bounds Green
- Woodside
- Noel Park
- Harringay
- Hornsey
- Stroud Green

This consultation paper outlines our proposal, the reasons for the proposal and seeks to obtain your views on what we are suggesting.

Our proposal is still in the formative stages and we will listen carefully to the results of the consultation before deciding about how to proceed.

We look forward to hearing from you.

You can participate by.

Completing our online survey www.haringey.gov.uk/propertylicensingconsultation

Attending one of our workshops please email. haringeyprs@melresearch.co.uk

Anyone with a disability or who needs extra help completing a questionnaire can request support by calling freephone 0800 0730 348

A paper copy of the consultation is also available on request by emailing or by calling freephone 0800 0730 348 or by emailing haringeyprs@melresearch.co.uk

2. Proposed Selective Licensing Areas

It is our proposal to introduce selective licensing under the following statutory grounds; -

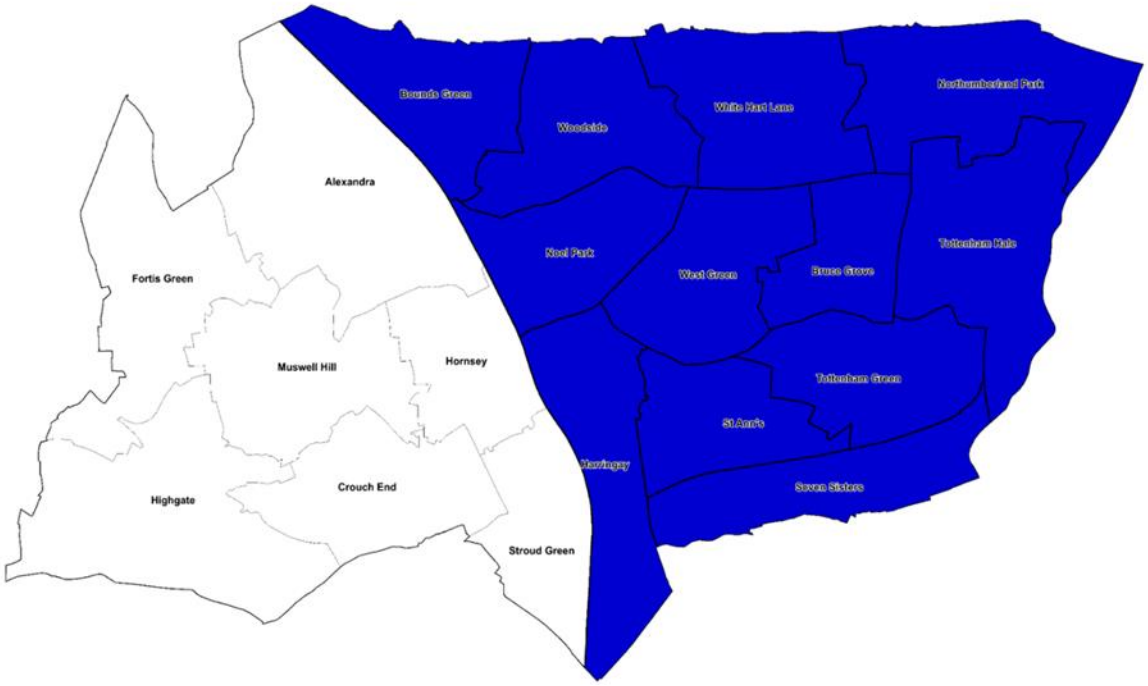
- A significant proportion of the stock is privately rented and that this stock is in:
    - Poor property condition
    - Suffers from Anti-Social Behaviour, all which is impacted by
    - High Levels of Deprivation.

The data shows that 14 wards out of the 19 wards in Haringey consistently meet the criteria for selective licensing in that:-

- They contain a high proportion of privately rented homes compared to the national average (19%)[1].
- Housing conditions within those wards are poor and the scheme through property inspections will allow the Council to improve this.
- The areas are experiencing a significant and persistent problem caused by anti-social behaviour, which private sector landlords are failing to address.
- The areas within the designation have the added factor of experiencing significant deprivation amongst its population.

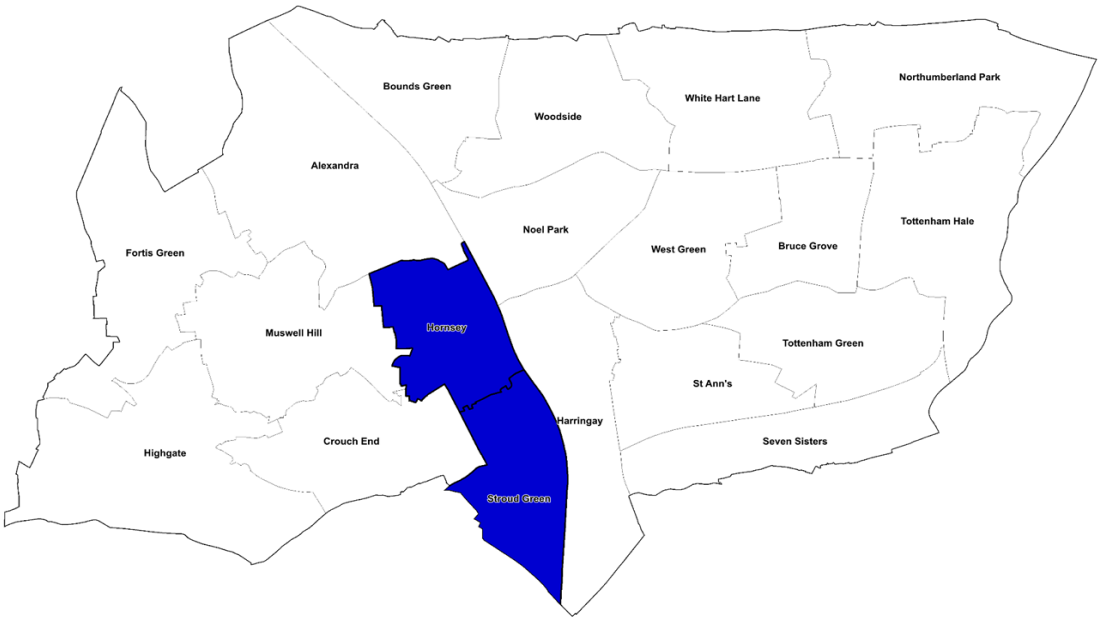
It is proposed that the Council introduces selective licensing within 14 wards in total. All wards will be subject to the same proposal however the wards will make up two designations based on the criteria above both of which will be considered on their own merits for the purposes of gaining secretary of State approval.

DESIGNATION 1 – 12 Wards



DESIGNATION 2 – 2 wards

[1] EHS Headline 2919-20, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/945013/2019-20_EHS_Headline_Report.pdf



3. Our Proposed Selective Licence Conditions

The selective licensing property Conditions proposed to be included in the scheme can be viewed in full on the Council website. Licence conditions can be Mandatory or Discretionary. The Mandatory conditions are required by law under the housing Act 2004 Schedule 4 and are not subject to consultation. The discretionary conditions do form part of our consultation and will be used to deal with property management and safety.

Please see Council website for full coverage of our proposed Licence conditions.
www.haringey.gov.uk/propertylicensingconsultation

4. Our Proposed Licensing Fee

The proposed selective licensing fee is £600. The fee will be split into two parts.
Part A of the fee is for the application for a licence and covers the cost of administration, processing, and validation of the application. If the licence is successful, a further fee, Part B will be charged before the Licence is issued. This fee covers the other costs incurred by the council under the licensing scheme. The fee split will be determined post consultation. A discount will also be given to Landlords and agents who are registered with a recognised accreditation scheme. This discount can only apply if the licence holder is the accredited member.

Please see Council website for full coverage of our proposed fee.
www.haringey.gov.uk/propertylicensingconsultation

5. Borough Profile

Population

The Borough has a population of 271,222 residents, Haringey has a young ethnically diverse population. 67% of the population are from BAME or other white ethnic groups. Over 180 languages are spoken in the borough, and 30% of residents have a language other than English as their first language. 36% of the borough's population is aged 18 or under; 13% is 65 or over. In terms of the borough's households, 32% are one person households, 16% are couples with dependent children and 11% are lone parents with dependent children.[2].Haringey the State of our Borough 2021

Housing & Homelessness

Haringey has the third highest rate of households in Temporary Accommodation in London, and the population outnumbers the availability of housing by approximately 12,000 people. Just more than 3,000 households in Haringey (25 per 1,000 households) are living in temporary accommodation (statutory homeless). This is the third highest rate in London, and despite decreasing, it is 80% higher than the London level (14 per 1,000). [3].Haringey the state of our Borough 2021

Health

Life expectancy in the borough is in line with the London average, though there are stark differences among different groups, and between different parts of the borough. Healthy life expectancy is 15 years less in Northumberland Park, in the north-east of the borough, than it is in Highgate, in the west. [4] Haringey the state of our Borough 2019

Impact of Covid19 & Health

Over 10,000 residents in NHS extremely vulnerable 'Shielded Group' in Haringey in 2021. Older people, BAME communities, people with disabilities, and people from disadvantaged socio-economic background have been more affected by the covid-19 virus in terms of illness and deaths. The local economy will be severely impacted in terms of (un)employment and business viability, and Poverty will increase, though the full extent of the increase is not yet known. [5] Haringey the state of our Borough 2021

Deprivation

Haringey is a borough with high deprivation levels. It is the 4th most deprived borough in London, and 49th most deprived in England (of 317), when measured by Indices of Multiple Deprivation (IMD). This is particularly the case in the east of the borough. [6]The English Indices of Multiple Deprivation 2019.

Crime, antisocial behaviour, and environment

15% of Haringey residents feel unsafe in their local area after dark. Residents living in North Tottenham, West Green and Bruce Grove are most likely to say they feel unsafe, residents living in Crouch End and Muswell Hill are the least likely to say this. 33% of residents dislike the amount of litter in their local area, and 15% of resident's dislike that their area is dirty or run down. [7] Haringey the state of our Borough 2019

Haringey is not unique in the challenges that face it, High crime, Anti-Social Behaviour, poor housing conditions and inequalities caused by high levels of deprivation are issues that the local authority is striving to tackle. As an authority we know we cannot achieve these outcomes in isolation and have the benefit of excellent partnering arrangements with the Police, Fire Services, Voluntary Sector

[2] Haringey the State of our Borough 2021 https://www.haringey.gov.uk/sites/haringeygovuk/files/state_of_the_borough_final_master_version.pdf
[3] Haringey the State of our Borough 2021 https://www.haringey.gov.uk/sites/haringeygovuk/files/state_of_the_borough_final_master_version.pdf
[4] Haringey the State of our Borough 2021 https://www.haringey.gov.uk/sites/haringeygovuk/files/state_of_the_borough_final_master_version.pdf
https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019
[5] Haringey the State of our Borough 2021 https://www.haringey.gov.uk/sites/haringeygovuk/files/state_of_the_borough_final_master_version.pdf
[6] The English Indices of Multiple Deprivation 2019. https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019
[7] Haringey the State of our Borough 2021 https://www.haringey.gov.uk/sites/haringeygovuk/files/state_of_the_borough_final_master_version.pdf

Organisation such as Bridge Renewal Trust and an ambitious Planning and Regeneration Directorate.

6. Evidence Summary

Residential Tenure

The private rental market is a growing sector within Haringey. In the 2011 census the private rented sector (PRS) in Haringey was listed as 32,095. Recent research (Metastreet 2019) has suggested that this figure has grown. Haringey PRS is now 43,775 dwellings, this is an increase of 36% from 2011 census.

Of the 108,915 residential dwellings (2019) in Haringey (Figure 1):

- Owner Occupation - 35,253 (32.4%),
- Social Housing - 29,887 (27.4%)
- Private Rented Sector - 43,775 (40.2%)

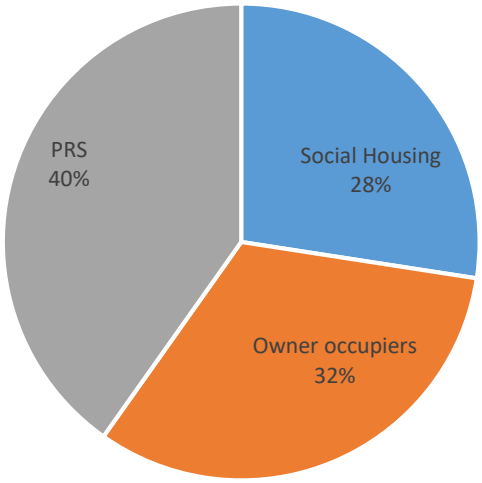


Figure 1. Tenure split as percent of total residential dwellings 2019

The median monthly private rent in Haringey is £1,500 (12 month rolling period to Q2 20-21). This was previously £70 less than the London average but is now £65 above it. The mean private rent is now £1,644 a week . Median private rent has increased by 17.4% in the last 4 years, a higher rate than local authority rents (5.5%) and London private rent (10.3%) [8] Haringey the state of our Borough 2021

Private Rented Sector

The evidence show Haringey has high level of renting across the borough. All wards in Haringey have above national average levels of private renting (19%[9].). The black horizontal line indicates the 19% threshold (Figure 2 & Map 1).

[8] Haringey the State of our Borough 2021 https://www.haringey.gov.uk/sites/haringeygovuk/files/state_of_the_borough_final_master_version.pdf
[9] [9] The English Indices of Multiple Deprivation 2019. https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019

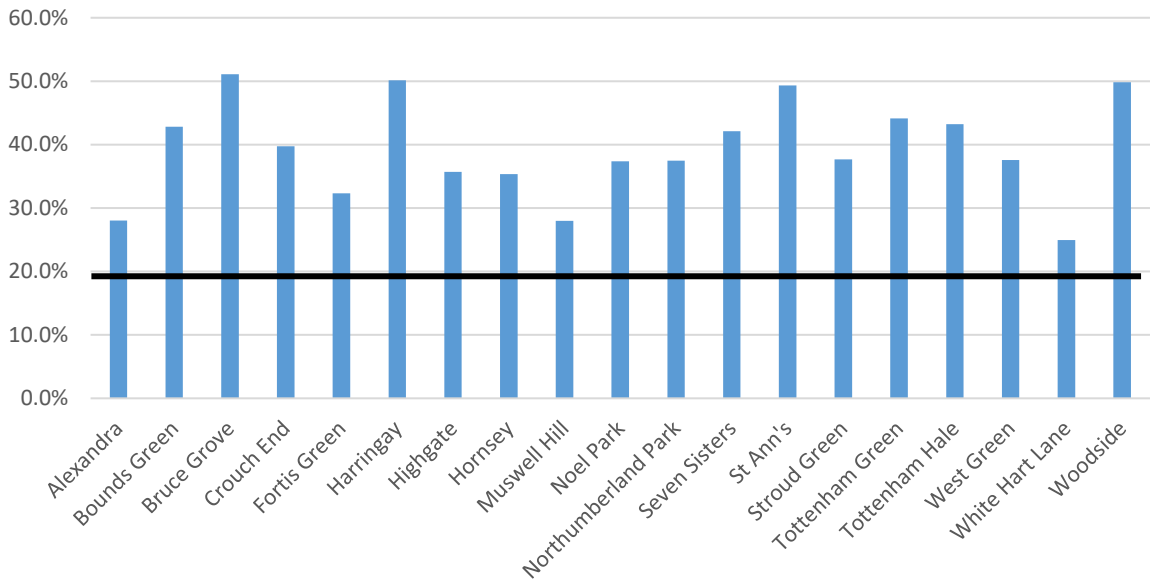
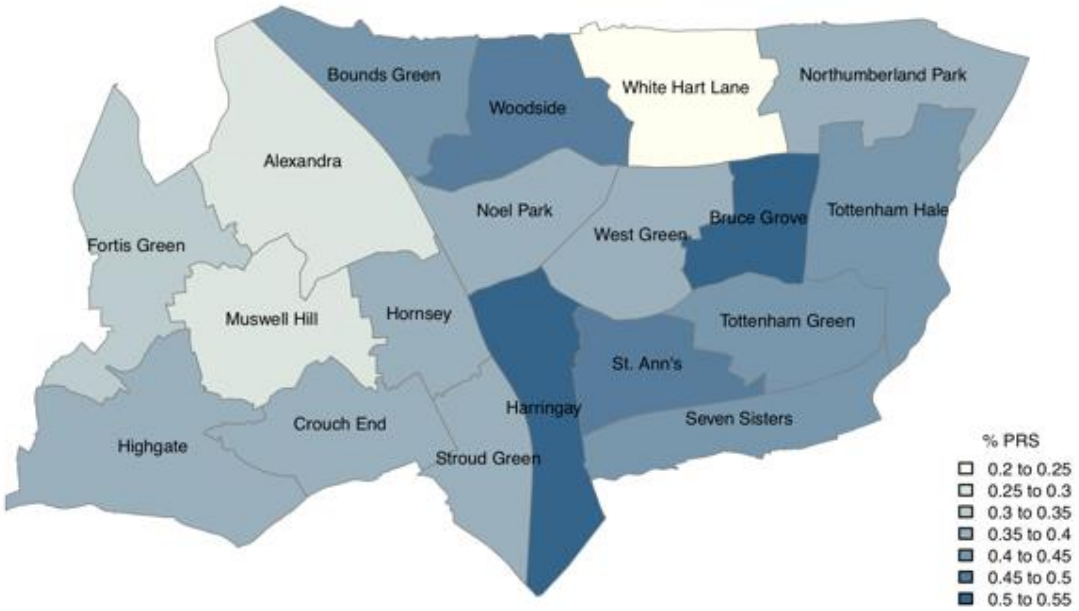


Figure 2. Percent PRS Map by ward



Poor housing condition

The Housing Health and Safety Rating System (HHSRS) is a risk-based assessment that the Council uses to identify hazards in privately rented dwellings. The most serious hazards are called Category 1 hazards and where these exist in a home, it fails to meet the statutory minimum standard for housing in England.

Figure 4 below show that Haringey is predicted to have 11,771 properties that are likely to have category 1 hazard, this equates to 27% of the privately rented dwellings within our borough. The national average which is 13 % as of 2020 . [10]

[10] EHS Headline 2919-20, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/945013/2019-20_EHS_Headline_Report.pdf

As you will see from the data below all wards in Haringey have property condition which is above the national average and therefore could be included within a proposed designation If the scheme were to be based on property condition alone.

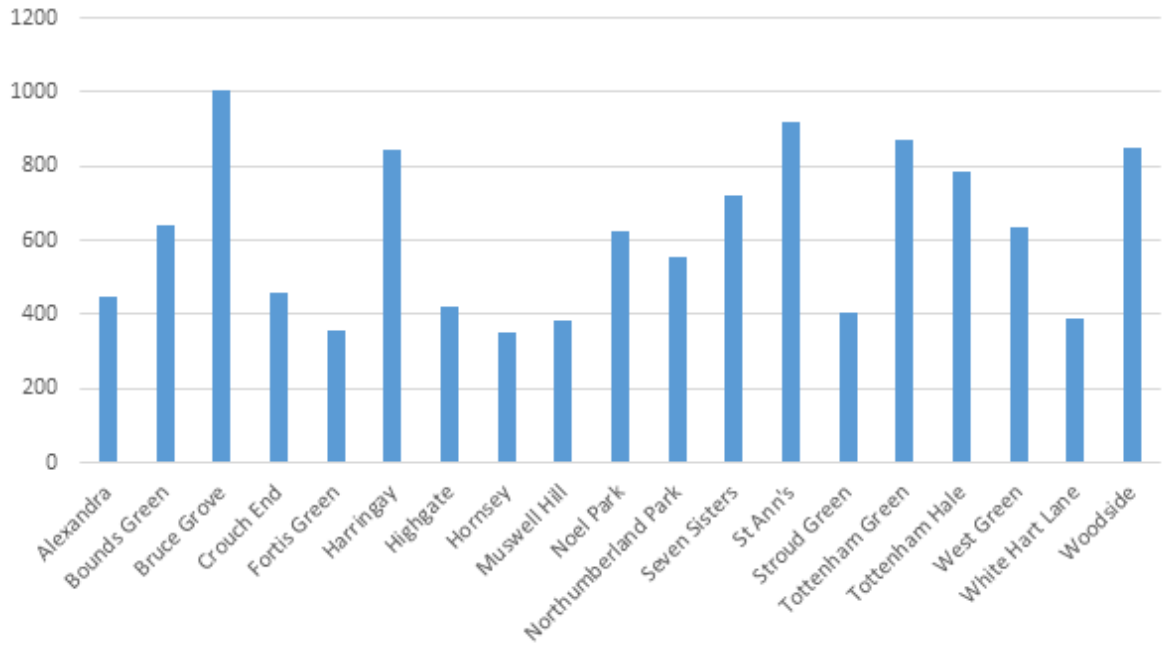


Figure 3. Predicted numbers of properties with at least 1 Category 1 hazard by ward.

PRS & Antisocial Behaviour

The Council is aware and appreciates that most landlords who let their properties do so responsibly, however poor property conditions and anti-social behaviour (ASB) including environmental ASB such as poor waste management or non-recycling of waste continue to be a problem.

Our borough continues to experience significant levels of ASB and property related ASB such as noise, poor waste management, littering and tenant behaviour. This chart below shows the incidents of ASB in relation to PRS dwellings in each ward.

Property related anti-social behaviour affects everyone including neighbouring residents and community stakeholders. Our waste partners report to us that privately rented homes are more likely to be responsible for poor waste management. Haringey spends more than £3 million a year dealing with fly- tipping - money that could be spent on other vital services.

Research show that significant level of ASB can be linked to the PRS (Figure 4) over a persistent period (5 years).

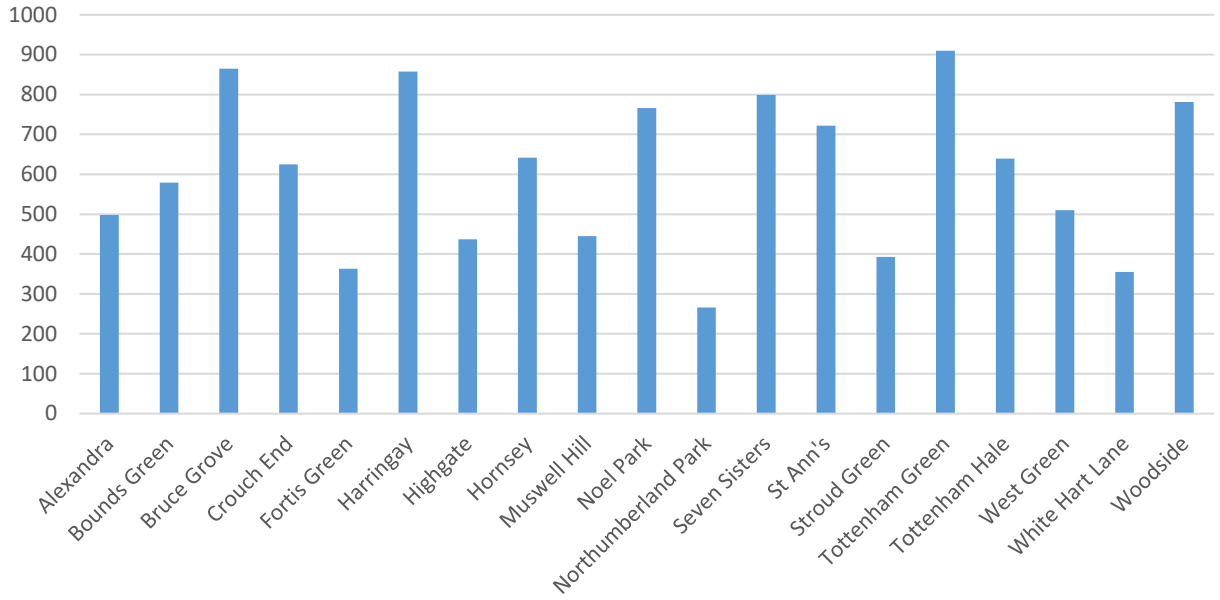


Figure 4. Number of ASB incidents linked to PRS properties by Ward (5 years)

Deprivation

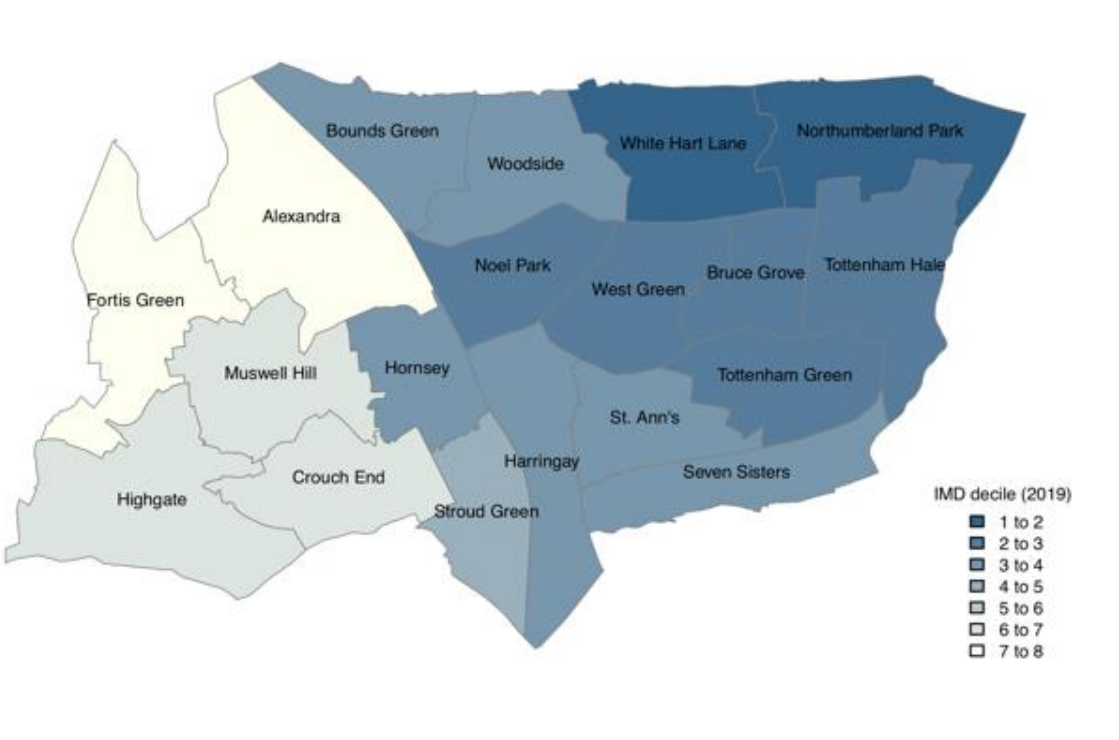
Deprivation is the consequence of a lack of income and other resources, which together can be seen as living in poverty. Deprivation can be measured and evidenced in various ways. The Indices of Multiple Deprivation 2019 (ID2019) are the Government's primary measure of deprivation for small areas (known as LSOAs) in England. The Index of Multiple Deprivation (IMD), combines measures across seven distinct aspects of deprivation: -

- Income,
- Employment,
- Education,
- Health,
- Crime,
- Barriers to Housing and Living environment.

Haringey is a borough with high deprivation levels. It is the 4th most deprived borough in London, and 49th most deprived in England (of 317), when measured by Indices of Multiple Deprivation (IMD). This is particularly the case in the east of the borough – over half of the Lower Super Output Areas (small areas that make up a ward), in the east are in the 20% most deprived in the country. By contrast, Highgate, Fortis Green, Muswell Hill, Alexandra and Crouch End wards have no Lower Super Output Areas in this category. [11] The English Indices of Multiple Deprivation 2019.

The map below shows the wards which are the most deprived in Haringey. The darker the blue colour the more deprived the area.

[11] The English Indices of Multiple Deprivation 2019. https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019



Map 2. Distribution of deprivation (IMD 2019) by ward (Map by Metastreet)

The graph below (Figure 5) shows the levels of deprivation for each ward in Haringey. 1.0 on the graph represents the most deprived 10% areas in the borough, 5.0 represents 50% most deprived areas in the borough and so on.

The IMD data shows that Highgate, Crouch end, Muswell Hill, Fortis green and Alexandra wards are significantly above the national average.

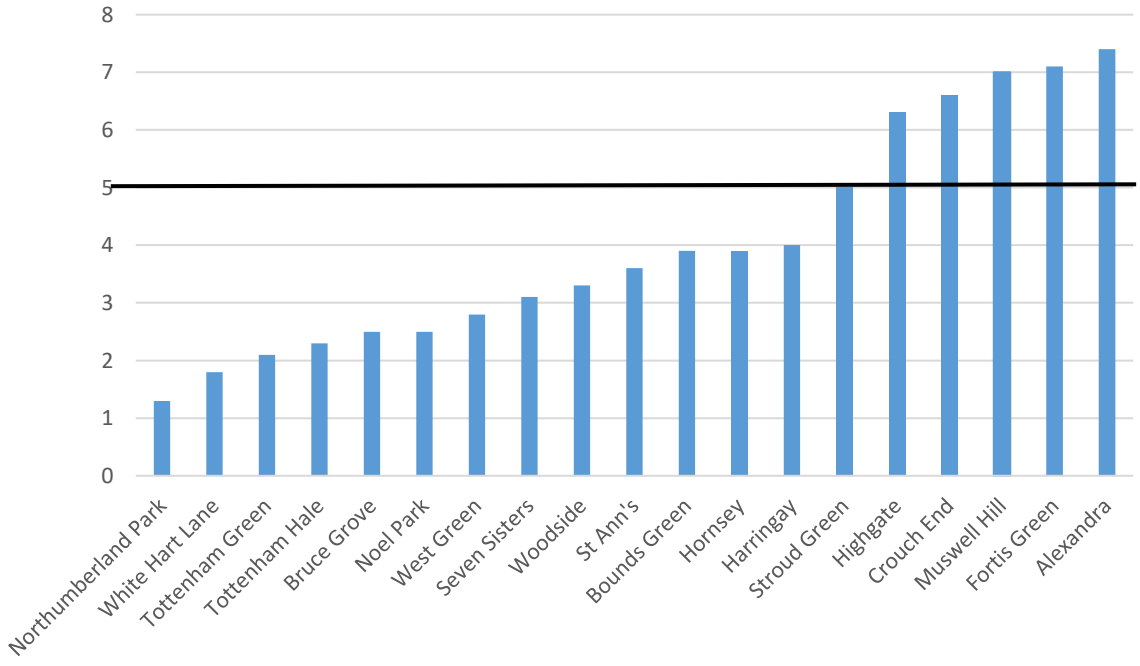


Figure 5. Distribution of Average IMD (2019) decile by ward (Source: ONS 2019) ***Black horizontal line is national average (5.0)***

Why are some Wards are not being included in the selective licensing scheme?

The table below identifies by ward:

- Above 19% PRS stock
- Evidence of significant levels of poor property condition
- Significant and persistent levels of ASB
- Below average Indices of Multiple Deprivation ranking

Ward	% PRS	Poor Property Condition	Significant and Persistent ASB	IMD Ranking
Alexandra	✓	✓	✓	x
Bounds Green	✓	✓	✓	✓
Bruce Grove	✓	✓	✓	✓
Crouch End	✓	✓	✓	x
Fortis Green	✓	✓	✓	x
Harringay	✓	✓	✓	✓
Highgate	✓	✓	✓	x
Hornsey	✓	✓	✓	✓
Muswell Hill	✓	✓	✓	x
Noel Park	✓	✓	✓	✓
Northumberland Park	✓	✓	✓	✓
Seven Sisters	✓	✓	✓	✓
St Ann's	✓	✓	✓	✓
Stroud Green	✓	✓	✓	✓
Tottenham Green	✓	✓	✓	✓
Tottenham Hale	50%	✓	✓	✓
West Green	44%	✓	✓	✓
White Hart Lane	50%	✓	✓	✓
Woodside	51%	✓	✓	✓

The wards highlighted in orange are those wards which meet some of the qualifying criteria but not all. We have considered the impact that deprivation has on inequality and the ability to achieve change in areas where there are existing factors such as, socio and economic influences contributing to a wider housing problem. We have therefore used this data to highlight those areas of the borough where we feel there is the greatest level of need and where we are likely to have the greatest impact based on our limited resources.

Through this consideration we are of the opinion that the 5 wards which are above the 5.0 decile could not be justifiably at this time. The five wards which have not been included in our proposal are:

- Alexandra
- Muswell Hill
- Fortis Green
- Highgate
- Crouch End

We will continue to keep these wards under review and seek to introduce selective licensing if the evidence suggest they would qualify for selective licensing. Moreover, we will continue to use our existing powers and other alternative options to deal with the issues of poor property conditions and property related ASB within these wards to ensure that those tenants and residents experiencing these issues also receive a service. These actions will be reactive and based on complaints from tenants and the public. They will be dealt with using our existing procedures and any landlord failing to comply will be subject to the Council existing enforcement policy.

7. What is Property Licensing?

Under the Housing Act 2004, there are three forms of licensing relating to private sector housing available to local authorities.

- Mandatory Licensing of certain HMOs
- Additional Licensing – HMO's
- Selective Licensing – Any other private rented dwelling

All licensing schemes are intended to address the impact of poor-quality housing, rogue landlords and anti-social tenants. In an area subject to licensing, all private landlords must obtain a licence and if they fail to do so, or fail to achieve acceptable management standards, the authority can take enforcement action.

Licensing Statutory Provisions

A licensing scheme designation lasts for five years from the date the designation becomes operational. A scheme may be renewed following the appropriate legal authorisations.

Property Licensing denotes through a prescribed process how a property should be controlled and managed. This is monitored through the property licence by Council Officers.

Subject to limited exemptions, a valid licence must be held by the appropriate responsible person, typically the landlord or managing agent in respect of all privately rented properties in such a designated area.

A licence holder must be fit and proper, the property must meet all legal standards, be in good condition and managed effectively.

All of these requirements are stipulated as 'conditions' of holding a property licence. It is an offence for a licence holder to fail to comply with any of the licence conditions throughout the licence period. Failure to licence or comply with licence conditions can result in Civil Penalty enforcement or prosecution.

The legislation allows Local Authorities to set and charge an appropriate fee to Licence applicants. The fee must be reasonable and reflective of the scheme in operation. Following recent case law, the fee is now required to be paid in two parts. Part A, which covers the processing of the application and the remainder, Part B, which can support the associated costs of compliance with the Licencing Conditions. All selective licence fee income is ring fenced for the administrative and operational cost of operating the licensing scheme.

Selective Property Licensing

Selective Licensing is an additional tool that local authorities can seek approval to use alongside their normal enforcement powers in order to target specific issues that are affecting the local authority and its community.

Selective licensing would allow the local authority to regulate landlords to manage this sector more effectively. There are several factors through which selective licensing helps to achieve effective change:

- It focuses resources on areas of concern whilst simultaneously generating revenue to contribute to the costs involved.
- It provides clearly defined offences (licensed/unlicensed) which simplifies enforcement - and where a landlord is intentionally operating without a licence it is highly likely the inspection process will uncover further offences.
- There is no 24-hour notice requirement for access before an inspection for licensing purposes. This is particularly important where criminal ('rogue') landlords are present.
- The proactive inspection approach frequently brings other problems to light.
- Licensing provides a clear driver for effective engagement between landlords and local authorities and drives up landlord awareness of their responsibilities.
- The pre-designation process focuses local authority minds on the development of clear, transparent and robust enforcement practices.
- Selective licensing encourages the development of effective intelligence-gathering mechanisms to support compliance by identifying unlicensed properties and then targeting those problematic properties.
- Promotion of joint working within the authority and other agencies - fire and rescue service, police, border control/immigration, social services, HMRC etc.

Making a Designation

A local housing authority may only make a designation if the area to be considered has a high proportion of property in the PRS. In England this is 19% of the total housing stock.

In addition to the above for selective licensing to be considered, <u>one or more</u> of the following six statutory grounds must be met:

i. Is an area of low housing demand (or is likely to become such an area)?
ii. Is experiencing a significant and persistent problem caused by anti-social behaviour and that some or all the private landlords letting premises in the area are failing to take appropriate action to combat that problem.
iii. Is experiencing poor property conditions in the privately rented sector.
iv. Is experiencing or has recently experienced an influx of migration and the migrants occupy a significant number of properties in the privately rented sector.
v. Is suffering high levels of deprivation affecting those in the privately rented sector.
vi. Is suffering high levels of crime affecting those in the privately rented sector.

The Housing Act 2004 also requires the local authority to demonstrate the following outcomes as part of its process of delivering a selective licensing initiative.

- Ensure that the exercise of the power is consistent with their overall Housing Strategy.

- Adopt a coordinated approach in connection with dealing with homelessness, empty properties and anti-social behaviour affecting the PRS as regards combining licensing with other action taken by them or others.

- Consider whether there are any other courses of action available to them (of whatever nature) that might provide an effective method of achieving the objectives that the designation would be intended to achieve.

- Consider that the making of the designation when combined with other measures taken by the authority alone or with other persons will significantly assist them to resolve the problem identified (whether or not they take any other course of action as well).

- Take reasonable steps to consult persons who are likely to be affected.
  by the designations and consider any representations made.

Where the proposed designation covers either 20% of the total geographic area of the authority or 20% of the total privately rented stock (based on census figures), the designation requires approval by the Ministry for Communities and Local Government (MCHLG).

Selective Licensing applications to the MCHLG require local authorities to first demonstrate the evidence for their concerns as well as look at alternative approaches and consult widely.

Our proposal due to the size of the area to be designated in terms of geography and the size of the private rented stock to be included, will require the approval of Secretary of State.

Property to be included in our scheme

The type of property that will be subject to selective licensing will be any privately rented dwelling that contains a single household. A single household can be defined as the following:

- a family, e.g., a couple (whether married or not and including same-sex couples) or
- persons related to one another.
- an employer and certain specified domestic employees, a carer and the person receiving care, a foster parent and foster child.

Exemptions from Selective Licensing

There are a number of exemptions to selective licensing scheme including:

a) properties licensable as an HMOs under mandatory or the proposed additional HMO licensing.

b) properties let by a local authority or a Registered Provider (RP), traditionally known as a not-for-profit Housing Association.

c) properties already subject to a management order.

d) properties subject to a temporary exemption notice.

e) owners who reside in property they own as their main residence (owner occupiers).

f) holiday lets; and tenancies under a long lease and business tenancies.

g) Any building which is occupied principally for the purposes of a religious community whose principal occupation is prayer, contemplation, education or the relief of suffering.

h) Student accommodation directly managed by educational institutions, e.g., halls of residence.

i) properties managed by a charity registered under the Charities Act 2011 and which—

   a. is a night shelter, or

   b. consists of temporary accommodation for persons suffering or recovering from drug or alcohol abuse or a mental disorder.

8. What we want to Achieve

Our selective licensing scheme aims to compliment the wider work of our borough wide HMO licensing Scheme, so that any privately rented property within the approved designation/s regardless of its status will need to be licensed with the Local Authority and comply with the Councils Licensing condition's.

Ultimately Improving property conditions and making landlords more accountable for the behaviour of their tenants is the overall objectives of this scheme.

The scheme is not in a position to alter the deprivation status of the wards identified within a designation, but we do aim to improve the barriers for those residents living in the PRS facing inequality. Strategic partnerships and involving the Council's wider Connected Communities service will hopefully enable us to identify residents in need and assist them in accessing other council services that can help improves their lives.

Improving property conditions, management and driving up standards in our PRS will contribute towards building stronger, safer more sustainable communities in Haringey. Communities which can contribute positively to Haringey and the local community is something we are committed to achieving.

The objectives of our proposed schemes are summarised in the delivery plan below.

OBJECTIVE	**OUTCOME**	**ACHIEVEMENT**
Improve Property Condition of all single family private rented accommodation.	Reduce the number of Housing hazards	How many properties will have improved conditions through our actions.
Improve the management standards of all single family private rented accommodation	Improve compliance through licensing of property standards.	Ensure that all licensable properties are licensed to ensure they know the licensing conditions that apply to them.

		Undertake targeted compliance checks in respect of property licensed under the selective licensing scheme.
Reduce the levels of ASB from privately rented single family dwellings.	Reduce repeat ASB incidence in licensed premises by 10% over the lifetime of the scheme	Collaborative working with frontline workers dealing with poor waste management to prevent missed collections and waste contamination and fly tipping. Document checks to ensure landlords are complying with ASB conditions.
Assist private sector tenants living in areas of deprivation to access Council & Voluntary services.	Ensure that Tenant engagement is a key part of the scheme.	Officers provide tenants with information and sign posting to support their housing and wider needs. Councils, services, connected communities and the Voluntary sector are aware of the scheme and know how to sign post people.

9. Alternative options

We have considered several other courses of action or alternative approaches to selective licensing. We do not believe however that either individually or collectively they would prove effective, or be as an effective means of tackling poor housing conditions and ASB in the borough. None of the options can deliver the scale of improvement that we believe is required in the PRS. Below outlines the alternative approaches that we have considered and explains why they are not sufficient to meet our objectives.

Use of Part 1 Housing Act 2004 enforcement powers [HHSRS] and Public Health powers

- Formal notices can be served that require improvements to be carried out. Councils can carry out work in default if a notice is not complied with. Landlords also risk being prosecuted if they do not comply with the notice.

- Formal action is generally a slow process with appeal provisions against most types of notices served, which can significantly delay the time for compliance. These powers do not place any obligation on landlords to be *proactive* in improving conditions. Work in default can be effective but is expensive and time consuming for the Council, with the risk that not all costs are recovered. Successful prosecutions do not themselves secure improvements in property conditions and the Council's prosecution costs are often not met in full. Further, the Council's powers under Part 1 do not enable it to regulate the management of the property.

Voluntary Accreditation schemes to facilitate improvement in property conditions and Management standards

- For those landlords who take part, accreditation can improve the ability to effectively manage a property.

- This requires voluntary landlord engagement. Rogue landlords are unlikely to attend/engage in these initiatives. We have tried such schemes through registration and training in the past and they have been resource intensive, take up has been poor and they are difficult to manage.

Depend on existing Enforcement Powers and Tools

- This relies on reactive responses to complaints.

- Resource intensive, it doesn't provide any incentive to landlords to improve their property and the outcome can be lengthy and costly process.

Better use of ASB powers and joining up with ASB enforcement officers

- Formal notices can be used to address ASB identified by officers on an individual level. If complied with they can resolve an issue and are often issued as a financial penalty.

- Rely heavily on another council service proactively and or reactively identifying perpetrators and evidence gathering. Notices are often not targeted at a landlord but the tenant which doesn't put any responsibility on the landlord to manage their properties or prevent re-occurrence. It is also resource intensive.

10. Licensing and our wider borough strategies

Haringey's Borough Plan

Haringey adopted a new Borough Plan in 2019 to set the Council's priorities over the 4-year period to 2023. The Borough Plan is centred around five key priorities:

- Housing,
- People,
- Place,
- Economy and
- Your Council.

Licensing the PRS clearly relates to Housing. The Housing Priority's overarching objective is for 'a safe, stable, and affordable home for everyone, whatever their circumstances'. The Borough Plan commits to 'working together to drive up the quality of housing for everyone' and specifically to 'Improve the quality of private rented housing and the experience of those living it, including by expanding landlord licensing and associated enforcement'. The Borough Plan commits to the Council introducing selective licensing for non-HMO homes in the borough.

It is important to note that the benefits that the Council expects to stem from the introduction of selective licensing will also help meet other priorities expressed in the Borough Plan. By reducing anti-social behaviour and creating more attractive streetscapes, it will contribute to making Haringey a safer, cleaner, and more attractive borough – as expressed in the Place Priority. And ensuring that homes are safe, warm and in good condition will help Haringey's residents, young and old, live more fulfilled, happy and healthy lives – objectives of the People Priority.

The Borough Plan also commits to the principles of equality of opportunity, fairness, and quality of life for all. Ensuring that more private landlords are licensed helps promote fairness across housing tenures in the borough and narrows the gap in quality of life that may exist between, and within, different housing tenures.

Haringey's Housing Strategy

Haringey's current Housing Strategy 2017-2022 also commits the Council to improving conditions in the PRS, stating that 'we will use our statutory powers to drive up quality in the PRS, whether selective, additional or mandatory licensing or other enforcement powers'. And a focus on, and commitments to, private renters will continue to be a focus in the new housing strategy currently under development.

Our new Housing Strategy will outline the role of the Private Housing Sector

At a regional level, the Mayor of London's Housing Strategy includes a strong focus on the PRS, and on councils' powers to improve the experience of private renters. Specifically, 'The Mayor wants councils to have the tools and resources they need so that private renters can expect consistently decent standards. He wants better regulation through property licensing and landlord registration… He will also support councils to run well-designed property licensing schemes. Haringey's proposed selective licensing scheme and its place within a range of complementary enforcement powers has been developed through close engagement with the GLA and neighbouring boroughs on good practice in improving the PRS.

Connected Communities

Haringey's pioneering integration programme, Connected Communities, began in September 2018. Connected Communities is a programme set up to improve access to council and voluntary services and support in Haringey to encourage residents to live their version of a good life. Connected Communities can provide anyone in the borough support with:

- Housing
- Benefits and financial advice
- Council Tax
- Employment
- English lessons (Adult learning)
- Parenting and childcare
- Linking in with community activities
- Applying for the EU settlement Scheme
- Anything else!

We have four Housing Connected Community officers who work alongside our Private Sector Housing Officers, to provide support to tenants who are finding their housing situation challenging. Whether that be sustaining a tenancy due to personal issues, not having financial means, harassment from landlord or other tenants or they are experiencing other influencing factors. This partnership arrangement allows PRS officers to focus on improving standards while the tenants' wider needs are addressed.

Haringey's Homelessness Strategy

Haringey's Homelessness strategy 2018-2021 is up for review but the guiding principle within this strategy is around prevention. The best way to prevent homelessness is to prevent it happening in the first place. The aim of achieving this was for all members of our partnership including homeless people themselves to play a role and take responsibility for this. New ways of integrating

homelessness prevention work with other services who meet people in housing need or who are at risk, enables the council to intervene early and more effectively.
Private Sector Housing is a partner service that plays an integral role in prevention of homelessness. We will continue to work collaboratively with our housing need partners to prevent tenants in the private sector from becoming homeless. Through our Connected Community Housing Officer and the Private Sector Housing Enforcement Officers we aim to intervene early, work with landlords and agents to resolve any issues and to sustain tenancies when and where we can.

Haringey's Empty Homes Policy

The Council revised its empty homes policy in July 2020. The new document sets out the key priorities and issues concerning empty homes in the borough. It provides a coordinated approach for the Council to adopt and a framework for Council officers to follow, it ensures our residents and stakeholders are clear on our policy and the actions we can take, and how residents can access our services. The Policy aims to target those homes which have been left empty the longest, which blight communities, attract Anti-social Behaviour and or crime. The policy reinforces our use of powers and when and how these will be used. As part of our Licensing programmes empty homes in our borough will be targeted within the designations to ensure a co-ordinated approach to improving communities.

Community Safety Strategy (2019-2023)

The Community Safety Strategy presents the Haringey Community Safety Partnership's approach and priorities to achieving a reduction in crime and anti-social behaviour in Haringey up to 2023.

The strategy is supported by a comprehensive strategic assessment that draws on data from across the partnership to identify trends, patterns, and drivers relating to crime and anti-social behaviour.

The strategy is informed by extensive consultation and engagement with partners across the system, with community groups, and with Haringey residents and businesses. The outcomes that the Community Safety Partnership seeks to achieve through the strategy are a reflection both of the data and what we have heard through this engagement activity.

The Community Safety Strategy aims to improve the quality of life in the borough by focussing partnership action on six outcome areas:

- Violence and high harm crimes
- Violence against women and girls
- Exploitation (including child sexual exploitation, child criminal exploitation, County Lines, trafficking, extremism, and modern slavery)
- Public confidence
- Victims of crime and anti-social behaviour
- Reoffending

A Community Safety Action Plan sets out the specific actions that community safety partners will take forward to address the issues identified in the strategy corresponding to the six outcome areas.

11. Housing Stock Research Methodology

The council have commissioned residential stock-modelling in 2019. The approach is based on council and open source data in combination with machine learning to provide insights about the prevalence and distribution of housing tenure and a range of housing factors.

Metastreet's Tenure Intelligence (Ti) has been used by a number of authorities to understand their housing stock and relationships with key social, environmental and economic stressors, including Waltham Forrest, Enfield, Croydon, Oxford, Liverpool and Southwark.

To ensure that Haringey Council could have confidence in the results of the study a validation process was undertaken. Predictions provided in 2019 for every property in the borough were matched to PRS tenant service requests received by the council after the study had completed. These randomly selected addresses were used to validate the predictive accuracy of the Metastreet model. Of the 330 PRS tenant service requests used as part of the validation test, Metastreet Tenure Intelligence predicted 86% correctly.

The housing models are developed using unique property reference numbers (UPRN) as keys, which provide detailed analysis at the property level. Data records used to form the foundation of this data include:

- Council tax
- Housing benefit
- Electoral register
- Private housing complaints and interventions records
- Other council interventions records
- ASB complaints and interventions records
- Experian Mosaic records & Energy Performance data

12. For Further information and details of the consultation

Supporting documentation can be found at www.haringey.gov.uk/propertylicensingconsultation

The Council welcomes view from all Haringey residents especially private tenants, landlords, letting agents with property in the borough and anyone or any organisation with an interest in the PRS. Our consultation is being run by M·E·L Research, an independent research company.

You can participate by.

Completing our online survey www.haringey.gov.uk/propertylicensingconsultation

Attending one of our workshops please email. haringeyprs@melresearch.co.uk

Anyone with a disability or who needs extra help completing a questionnaire can request support by calling freephone 0800 0730 348 A paper copy of the consultation is also available on request by emailing or by calling freephone 0800 0730 348 or by emailing haringeyprs@melresearch.co.uk

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London Borough Haringey. Selective Property Licensing

Appendix 2

Map of Designated Area

Proposed Selective Property Licensing Designation

To include all Roads within the following wards:

Bruce Grove	Bounds Green	Harringay	Noel Park	Northumberland Park	Seven Sisters
St Ann's	Tottenham Green	Tottenham Hale	West Green	White Hart Lane	Woodside



London Borough Haringey. Selective Property Licensing

Appendix 3

Consultation Analysis & Outcome Report

m·e·l research

Consultation on selective licensing of private rented property in Haringey

Haringey Council

December 2021

m·e·l research

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Project details and acknowledgements

Title	Consultation on selective licensing of private rented properties in Haringey
Client	Haringey Council
Project number	20172
Author	Karen Etheridge
Project Manager	Karen Etheridge

M·E·L Research would like to thank Haringey Council for their support with the consultation. We would also like to thank residents, tenants, landlords, agents and stakeholders for taking part in the consultation.

This project has been delivered to ISO 9001:2015, 20252:2019 and 27001:2013 standards.

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MRS Evidence Matters™ Company Partner

Executive summary

This report presents the findings of the public consultation on Haringey Council's proposals to introduce a targeted selective licensing scheme in Haringey to tackle the growing issues that are being experienced in its private rented sector (PRS) and allow the Borough to manage the sector more effectively by regulating landlords.

The Council proposed to introduce the scheme within 14 wards out of the borough's total 19 wards, comprised of two separate designations, to address the specific problems faced within each designation area.

The consultation ran for 16 weeks from 17th May to 5th September 2021 and sought to gather local views on the proposals, including the proposed licensing conditions, fees, and alternatives that the Council could consider. The Council commissioned M·E·L Research, an independent research company, to deliver the consultation survey and independently analyse and interpret the results.

The consultation also looked at respondents' experiences of issues in the borough around property conditions, deprivation, and anti-social behaviour.

A variety of consultation methods were used to allow interested parties to share their views on the proposals and adaptations were made in light of the ongoing COVID-19 pandemic. These methods included an online survey, a postal survey, remote public workshops, stakeholder interviews, a freephone number for verbal feedback, and an email address for written feedback and queries.

The Council promoted the consultation extensively through various communication channels, both within Haringey and beyond, to encourage landlords, tenants, agents, residents, businesses, and other interested parties to get involved.

In total, the consultation generated 956 survey responses (950 online and 6 postal). 27 people attended three public workshops. Seven stakeholders were interviewed. Finally, 36 individuals or organisations responded with formal written submissions to the consultation.

Key findings

1. Selective Licensing scheme

Table 1: Summary of online and postal survey responses on proposal (overall/by respondent group)

	Overall	Residents	Landlords / agents	Private tenants	All other respondents
Base	956	335	204	375	42
Agree with selective licensing in designated areas	56%	67%	13%	67%	69%
Disagree with selective licensing in designated areas	34%	26%	79%	19%	19%
Positive impact on proposed areas	58%	67%	15%	70%	74%
Positive impact on nearby areas	46%	54%	12%	54%	69%
Positive impact on you / your business / organisation	43%	54%	8%	50%	55%
Anti-social behaviour is a problem	75%	80%	57%	79%	86%
Deprivation is a problem	73%	77%	51%	80%	83%
Poor quality housing is a problem	72%	77%	44%	83%	83%
Agree with proposed licence fees	51%	61%	16%	60%	67%
Disagree with proposed licence fee	40%	30%	80%	29%	19%
Proposed discounts to fees are reasonable	51%	49%	36%	59%	57%
Proposed discounts to fees are unreasonable	24%	23%	44%	16%	10%
Agree improve quality of neighbourhood	62%	73%	23%	72%	86%
Agree improve property safety and standards	67%	76%	30%	78%	81%
Agree improve management standards	66%	75%	28%	76%	81%

NB. Where people identified themselves as belonging to more than one group (such as resident, private tenant etc…), we have assigned respondents to one principal group (prioritised by landlords/agents first, followed by private tenants, residents and then grouped all other respondents). Therefore, the base sizes are lower than those shown in Table 5.

In summary, the **selective licensing scheme proposal** was supported by over half of respondents who took part in the survey (56%), whilst around a third disagreed with the proposal (34%). Around two thirds of residents and private tenants were supportive of the proposal (67% each), whilst the majority of landlords and agents disagreed with the proposal (79%). 69% of all other respondents were also supportive of the proposal.

Overall, results show that a similar proportion (58%) also felt that the **scheme would have a positive impact on the proposed area**. Around half of all respondents (46%) felt the proposed scheme would have a positive impact on **other nearby areas**, and 43% felt the proposed scheme would have a positive impact **on themselves and/or their business or organisation** (43%). Residents, private tenants and all other respondents were positive across the board, whilst landlords and agents were negative across the board, feeling that it would have either a negative impact or no impact.

Over half of respondents (51%) supported the **level of licence fee**, whilst four in ten disagreed (40%). Similarly, over half (51%) agreed that the **proposed discounts on the licence fee were reasonable**, although a lower proportion felt they were unreasonable (24%). Again, support was stronger amongst residents, private tenants and other respondents, regarding the fee and proposed discounts, and weaker amongst landlords and agents.

When asked about whether the **proposed licensing conditions would help improve the quality of the neighbourhood, property safety and standards, and also management standards**, support was positive overall (with between 62% and 67% agreeing), although around a quarter (24-27%) disagreed. Support was stronger amongst other respondents (between 81% - 86% agreed), as well as residents and private tenants (at least seven in ten agreed). Most landlords and agents disagreed (59%-64%).

2. Alternatives to licensing and other comments

At the end of the survey respondents were given the chance to provide any other comments on the proposals or any alternatives that the Council could consider. The most common response was that it was vital to regularly **monitor the scheme and have checks in place to enforce the scheme** (71 responses), followed by a need to have **improved living conditions, standards and safety, better monitoring and control and/or protection for tenants** (47 responses). Following on from this, a similar number of comments were **generally in agreement with the scheme** (45 responses).

3. Stakeholder views

In total, feedback was gathered from 7 stakeholder interviews. The stakeholders interviewed are listed in Appendix 4. Stakeholders were generally in favour, although some felt that it was vital to **inspect properties before licensing** and enforce the scheme, whilst others felt having the scheme would ensure that unlicensed landlords would be more easily identifiable and therefore enforcement could be more focused on finding and dealing with these. Most stakeholders felt that

the **fees were reasonable**, whilst the NRLA felt they were too low to have a proper inspection and enforcement element.

4. Views from the public meetings and written responses

Feedback was also gathered via written responses and public meetings. Some of the key points from these sections within the report are summarised here.

Some tenants and residents felt that **landlords need to be held to account** and there are clearly issues being experienced with overcrowding, ASB, crime and poor property standards, that landlords are not dealing with or acknowledging.

However, when we look at tenants who responded, some felt that **their landlord was doing a good job** and therefore questioned why the scheme was needed, whilst others were concerned that the **fees were going to be passed onto tenants** via rent increases.

Some tenants, residents and landlords questioned the possible **impact that this may have on the sector**, as landlords may choose to sell up, which could reduce the number of available rental properties.

5. Experiences in Haringey

The survey contained a section of questions which looked to understand views and experiences of respondents around three key issues that the selective licensing proposal is looking to improve. The key headlines from each of these is provided below:

Housing conditions in Haringey

The most commonly felt problem around housing conditions in Haringey was the **poor state of repair of private rented properties** (73% felt this was a problem), followed by **poorly maintained outside spaces in private rented properties** (71% felt this was a problem). When asked where in Haringey these problems were felt to be a concern, around a third (32%) said the **whole borough**, although around a fifth (21%) said this wasn't applicable (i.e. they didn't feel this was an issue in the wards or didn't know). The 14 wards that the proposed scheme would cover were ranked by respondents as the top 14 wards where these were an issue.

Deprivation in Haringey

Over eight in ten (82%) respondents felt that there are problems with **areas not being clean and well maintained in Haringey**, followed by three quarters (75%) who felt **poor quality housing** is a problem.

Antisocial behaviour in Haringey

The most significant problem felt by respondents was **leaving rubbish in gardens/on the street** (87% felt it was a problem), followed by **alcohol or drug-related activity or noisy, rowdy or inconsiderate neighbours** (both 79%). When asked where in Haringey these problems were felt to be a concern, around four in ten (39%) said the **whole borough**. The 14 wards that the proposed scheme would cover were again ranked by respondents as the top 14 wards where these were an issue.

Summary of findings

Just over half of all respondents supported the key aspects of the proposed licensing scheme, including the proposed designated areas, the proposed licence fees and proposed discounts. Most private tenants, residents and 'other' respondents agree with the proposal to introduce a selective licensing scheme in 14 wards in Haringey. Most felt that it will have a positive impact on the proposed areas, and over half felt it is likely to have a positive impact on nearby areas and on them/their business or organisation. The majority of these groups also felt that the proposed conditions are likely to improve a variety of aspects, such as the quality of the neighbourhood, property safety and standards and management standards.

Conversely, the vast majority of landlords/agents disagreed with all aspects of the proposals, from the scheme proposal across 14 wards, the proposed licence fees and the discounts (although the discounts were slightly more supported than the other elements). The vast majority of landlords and agents felt that the scheme will have a negative impact or no impact on Haringey and the conditions were unlikely to improve standards.

Over half of respondents from the groups, including landlords agreed that anti-social behaviour is a problem in Haringey, as is deprivation. A much higher proportion of residents, private tenants and other respondents felt the problems to be worse than landlords/agents did.

The majority of stakeholders interviewed were supportive of the licensing scheme – these were predominantly people working within the Council or people working with private rented tenants. Several felt that it was vital to inspect properties before licensing and that the Council has to enforce the scheme, not just issue licences.

The majority of written responses were not in favour of the scheme, with a number highlighting concerns about the evidence base, as well as querying the inclusion of specific wards within the proposals. The three London boroughs that replied were supportive of the scheme.

Lastly, views from public meeting attendees were mixed, although most expressed concerns about fees being passed onto tenants in the form of rent increases.

Introduction

Background

Haringey has seen a significant increase in its PRS; recent data modelling estimates that the borough has just under 44,000 privately rented dwellings. Alongside this growth, Haringey like many other urban boroughs has noted an increase in the prevalence of problems such as poor property conditions, poor landlord management, significant and persistent anti-social behaviour (ASB) and correlated deprivation in areas containing high concentrations of privately rented properties.

Haringey Council is considering introducing a targeted selective licensing scheme, under Part 3 of the Housing Act 2004, to help tackle these problems in areas of the borough where they feel there is the greatest level of need.

Before making any decision, the Borough commissioned M·E·L Research to gather local views, in particular from local landlords, private tenants, agents, residents, businesses and organisations inside Haringey and beyond.

Proposals

Haringey is proposing to introduce a selective licensing scheme in 14 wards of the borough through two designation areas, with known issues around poor property conditions, anti-social behaviour and deprivation. These are:

Bounds Green	Northumberland Park	Tottenham Green
Bruce Grove	Seven Sisters	West Green
Harringay	St Anns	White Hart Lane
Hornsey	Stroud Green	Woodside
Noel Park	Tottenham Hale	

Under the scheme, landlords of private rented properties within the proposed designation areas will be required to obtain a licence to rent out their property to a single-family household or two unrelated sharers (excluding properties falling within certain exemption criteria). Landlords will be charged an associated fee for registration and the scheme will run for a five-year period.

The consultation focused on the degree to which respondents agreed or disagreed with the proposal to introduce the selective licensing scheme, the impact the proposed scheme would have on respondents and Haringey more generally, as well as views on the proposed licence fees, discounts, and conditions. It also looked at respondents' experiences of issues in the borough, around property conditions, deprivation and anti-social behaviour.

Public consultation

The public consultation took place over a 16-week period (17th May to the 5th September 2021). An online survey was used as the principal method of consultation, with paper copies of the questionnaire and a telephone helpline available for those who wished to complete the survey either way. An email address was also provided to gather any written comments or feedback that have been analysed and included in the appendices.

Throughout the consultation, the response rate and demographic profile of respondents was periodically reviewed. The Council responded by extending the consultation period by 4 weeks from the original end date of 8th August 2021 to maximise participation from key stakeholders, including protected and vulnerable groups.

COVID-19 pandemic

The start of the consultation coincided with the commencement of 'Step 3' of the Government's roadmap for lifting the national lockdown in England (which had been in place since 6th January 2021). The roadmap had been announced on 22nd February 2021 by the Prime Minister and two phases of lockdown easing had already been completed prior to the launch of the consultation.

Step 3 saw the Government relax their previous guidance on outdoor gatherings by increasing the limit of people allowed to mix outdoors from 6 people (or two households) to 30 people. Formerly prohibited indoor social gatherings were legalised for 6 people (or two households) and indoor venues reopened.

In line with the Housing Act 2004, 80(9), the Council developed a communications plan to ensure all persons who were likely to be affected by the proposals had an opportunity to take part in the consultation. The plan leveraged a variety of communications channels to maximise the Council's reach despite the pandemic restrictions, including a widely publicised digital advertising campaign and direct marketing letters/e-mails to key stakeholder groups.

As the Government's planned easing of the pandemic restrictions was to be kept under review, the Council took the decision to not schedule any 'in person' promotional activities. This decision was reinforced by the limited availability of COVID-safe venues across the Council's locations that would allow for the required social distancing measures. As a result, all consultation events were held online. Various provisions were also made to ensure that digitally excluded stakeholders still had an opportunity to share their views, including reaching out to local community and outreach groups and writing directly to 44,000 private tenants. The table below provides a high-level overview of the consultation activities undertaken and the level of restrictions at the time of their delivery.

Table 2: Timeline of pandemic restrictions and consultation activities

From	COVID-19 restrictions/announcements	Consultation activities
17th May 2021	Entered step 3 of the Government's roadmap for lifting the lockdown in England: ▪ Limit of 30 people allowed to mix outdoors. ▪ 'Rule of six' or two households allowed for indoor social gatherings. ▪ Indoor venues reopened, including pubs, restaurants, and cinemas. ▪ Up to 10,000 spectators allowed to attend outdoor-seated venues like football stadiums.	▪ Digital: Launched digital advertising and social media campaigns; set-up a dedicated consultation webpage and signposted the consultation across the Council's website; and a campaign was launched across London Property Licensing's platforms. ▪ Direct marketing: Letters and emails sent targeting landlords, letting agents, and managing agents. ▪ Non-digital: Published a press release, distributed leaflets and posters to customer centres, libraries, resource hubs and local businesses; and, displayed adverts on 22 billboards across the borough.
14th June 2021	Prime Minister announced that the planned step 4 of the easing of restrictions in England on 21 June 2021 would be delayed by 4 weeks to combat the rising cases of the Delta variant.	▪ Digital: Regular posting and monitoring continued across all digital and social media campaigns; and two online public workshops were held.
21st June 2021	▪ 30 people cap on weddings was abolished. ▪ All other step 3 restrictions remained in place.	▪ Direct marketing: Letters sent targeting Haringey Council leaseholders and their tenants, households indicated to be renting privately and Council employees. ▪ Non-digital: Commenced reaching out to partner organisations to ask them to promote the consultation to their client groups and staff; attended virtual stakeholder meetings to encourage participation; placed adverts in Haringey People Magazine and Enfield Independent; and,

		continued displaying adverts on 22 billboards across the borough.
19th July 2021	Entered step 4 of the Government's roadmap for lifting the lockdown in England: ▪ All legal limits on social contact were removed, and the final closed sectors of the economy reopened (e.g. nightclubs).	▪ Digital: Regular posting and monitoring continued across all digital and social media campaigns; one more online public workshop was held; and, conducted 7 remote partner interviews. ▪ Direct marketing: Letters sent targeting existing HMO licence holders. ▪ Non-digital: Continued reaching out to partner organisations to ask them to promote the consultation to their client groups and staff; continued attending virtual stakeholder meetings to encourage participation; and, continued displaying adverts on 22 billboards across the borough.

Communication channels

The survey was promoted by the Council to interested parties within the borough, such as landlords, agents, tenants, residents, local businesses and third sector organisations. It was also promoted to interested parties in neighbouring boroughs.

As there was no existing selective licensing scheme in place, the Council did not have the benefit of an existing mailing list for their key stakeholder groups. To help spread the word far and wide, the Council collaborated with local partner organisations and other internal departments to promote the consultation.

In addition, targeted communications and accommodations were made throughout the consultation to reach the diverse communities that Haringey serves, including:

Translations of direct marketing communications offered

Connected Communities asked to facilitate participation for persons with accessibility needs

Officers attended the Multi-Faith Forum to encourage leaders to promote the consultation within their communities

Council consulted the Haringey Together Citizens Panel

Contact was made with various local community groups to encourage them to promote the consultation to their client groups, such as:

Cypriot Centre

Embrace UK

Haringey Migrant Support Centre.

A full list of all activities taken to promote the consultation is below:

Table 3: Communications activities (within the borough)

i. Communications targeted within the borough	
Direct marketing	▪ Letter to approximately 44,000 households indicated to be renting privately in the borough – 21 June 2021 ▪ Letter to 4,352 Haringey Council leaseholders (and their tenants, where applicable) – 17 June 2021 ▪ Letter to 175 managing agents operating in the borough – 28 May 2021 ▪ Email to 196 landlord/letting agents with an existing HMO licence in the borough and a registered email address – 26 May 2021 ▪ Letter to approximately 1,400 existing HMO licence holders in the borough – 24 August 2021
Partner	▪ Email to over 50 partner organisations between 9 July 2021 and 24 August 2021 ▪ Letter to landlord associations – 26 May 2021 ▪ Mailshot to Connected Communities and team meeting attended on 15 June 2021 ▪ Mailshot to Yearly Years (they also attended the above meeting on 15 June 2021) ▪ Mailshot to the Multi-Faith Forum and forum attended on 27 July 2021 ▪ Mailshot to Neighbourhood Watch and Safer Neighbourhood Panel and meeting attended on 27 July 2021 ▪ Local Citizens Advice Bureau promoted the consultation public workshops on their Facebook and Twitter accounts on 31 May 2021 and 21 June 2021. They also promoted the consultation as part of the research interviews that they undertook for their recent report on the private rented sector in Haringey ▪ Haringey Adult Learning Service promoted the consultation in their newsletter – June 2021 ▪ 7 partner interviews held on the week commencing 30 August 2021

Digital	▪ Information made available throughout the Council's website for the entire consultation period and a dedicated webpage was created
	▪ Regular reminders with links to the consultation were posted out via social media between 18 May 2021 – 3 September 2021
	  ▪ 33 posts on Facebook, with over 8400 impressions, 2 reactions and 8 shares.
	  ▪ 34 tweets on Twitter, receiving a total of 20 re-tweets, 2 quote tweets, 29 likes and 8 comments

Press & Media	▪ Advert in Haringey People Magazine in June-July edition - distributed to all households in the borough (Approx. 117,000 per edition) ▪ Advert in Haringey People Extra on 27 August and 3 September 2021 – emailed to 4,500+ subscribers.

	▪ Adverts displayed on digital screens around the borough -22 locations (shown here) ▪ Over 1000 leaflets were distributed at the Council Customer Services centres, libraries, resource hubs and local businesses – 19 May 2021. ▪ Posters were displayed within the Council Customer Services centres – 19 May 2021
Internal	▪ Email to all Homes for Haringey employees – June 2021 ▪ Advertisement on the Haringey Council staff intranet news board – 14 July 2021 ▪ Email to all council members -23 June 2021

Table 4: Communications activities (outside of the borough)

ii. Communications targeted outside of the borough and beyond	
Partner	▪ Details of the consultation emailed to all London Boroughs to share with their landlord' forums/letting agents – 25 June 2021
Digital	▪ Programmatic digital call-to-action adverts displayed across a wide-range of platforms throughout the consultation period - with over 700,000 impressions and an interaction rate of over 2,000. The click-through rate was 0.7%, which is above the national average for display ads of 0.3-0.6%. Website and social media placements included but were not limited to: Gumtree.com Facebook.com Dailymail.co.uk Zoopla.co.uk theguardian.com ebay.com metro.co.uk ▪ Information made available throughout the Council's website for the entire consultation period and a dedicated webpage was created
Press & Media	▪ Press release and consultation picked up by: Local: Advert displayed in the Enfield Independent on 14 July 2021. Distribution of 8,000 per edition. Trade Press: Several adverts were displayed on the London Property Licensing webpage (in a variety of formats) between 8 June and 5 September 2021.

In addition, three public meetings were held with interested parties who signed up to attend an online workshop, with 27 attendees, and qualitative views were gathered, which are presented in the report.

Profile of respondents

An online survey was completed by 956 respondents, with 5 of these being from respondents having no connection with Haringey (i.e. do not reside, work, let a property or operate a business in Haringey). A breakdown of respondent types is provided in the table on the next page.

Table 5: Respondent profile to the online survey

Respondent profile	Number	% of responses
Resident	489	51%
Private landlord	195	20%
Letting agent	11	1%
Managing agent	15	2%
Private tenant	381	40%
Work in Haringey	78	8%
Business in Haringey	26	3%
Other	34	4%
No connection	5	1%

(Multiple answers possible)

Reporting conventions

Owing to the rounding of numbers, percentages displayed on charts in the report may not always add up to 100% and may differ slightly when compared with the text. The figures provided in the text should always be used. For some questions, respondents could give more than one response (multiple choice). For these questions, the percentage for each response is calculated as a percentage of the total number of respondents and therefore percentages do not usually add up to 100%.

Where free text questions were asked, comments have been coded against common themes. Where there are less than 5 comments attributed to a theme, they have been included under 'other'.

The results in the report by sub group are presented by landlord/agent, resident, private tenant and all other respondents (grouped together from all other groups, due to small numbers in each). Where people identified themselves as belonging to more than one group, we have assigned respondents to one principal group (prioritised by landlords/agents first, followed by private tenants, residents and then by business in Haringey, work in Haringey, no connection and other').

The number of respondents to each question is presented as 'N=' throughout the report.

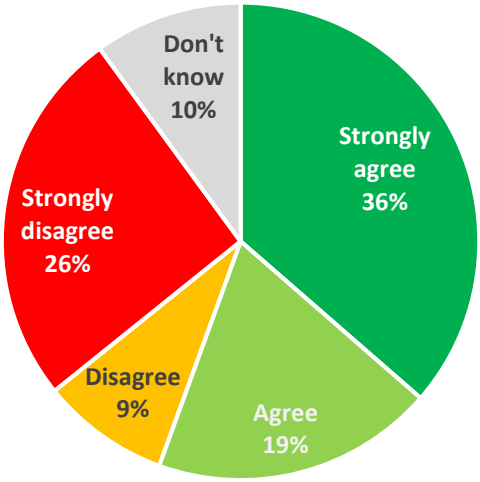
Survey responses to Selective Licensing proposal

In total, we received 956 responses, made up of 950 from the online survey and 6 postal surveys. The profile of respondents is shown in Appendix 3. Below is a summary of these responses combined. The Council will consider and respond to the comments from the survey, along with those from the written responses, in the Council's response to representations, which will be published alongside the final proposal considered by the Council's Cabinet.

Selective Licensing Scheme

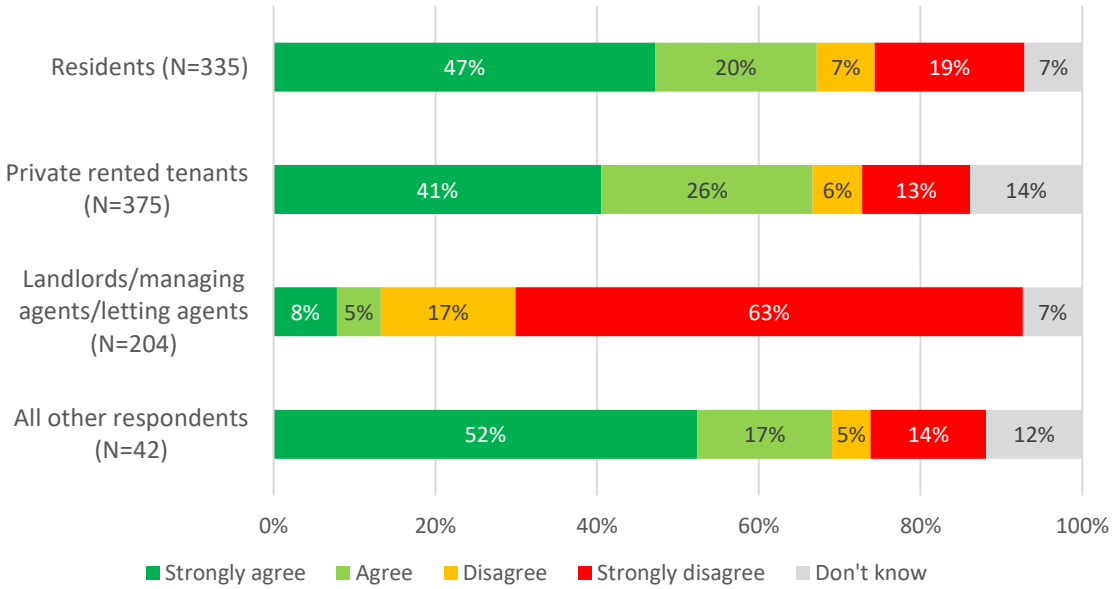
Overall, around over half (56%) of survey respondents agreed with the proposal to designate the proposed areas for Selective Licensing, with over a third (36%) strongly agreeing and a further 19% agreeing. In contrast, over a third (34%) of respondents didn't agree, with a quarter of these strongly disagreeing (26%).

Figure 1: Level of agreement with the proposal to designate the specified areas for Selective Licensing (N=956)



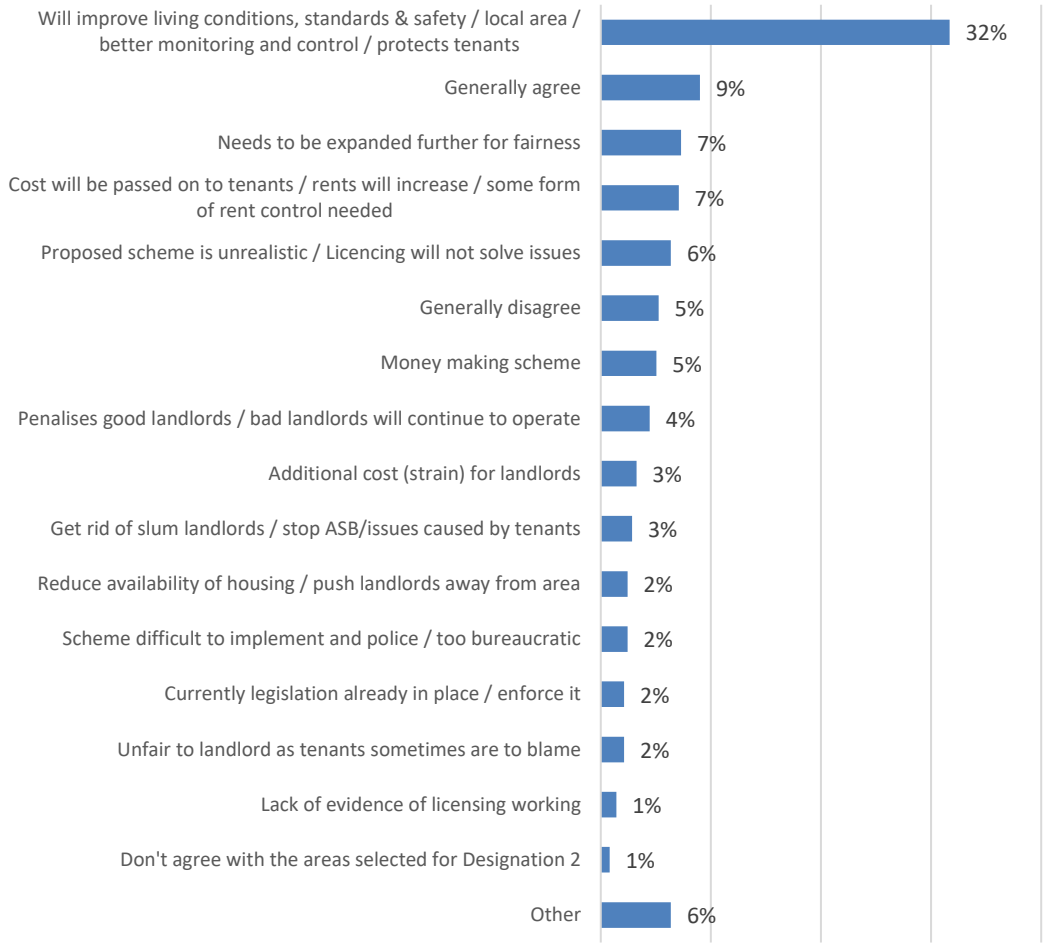
As shown below by respondent type, support for the proposal to introduce selective licensing was strongest among **residents and private tenants** (67% agreeing), as well as all other respondents (69% agreeing), with a higher proportion of other respondents strongly agreeing (52%). In contrast, **the majority of landlords/agents** disagreed (79%), with most 'strongly disagreeing' (63%).

Figure 2: Level of agreement with the proposal to designate the specified areas for Selective Licensing (by respondent type)



All respondents were then asked to provide their reasons why they agreed or disagreed with the proposed scheme. Comments show that the most common reasons for agreeing included **improving living conditions, standards & safety, the local area, better monitoring and control, and protecting tenants** (313 respondents), followed by **agreeing with the scheme** (89 respondents). The most common reasons for disagreeing included **costs will be passed on to tenants/rents will increase/rent control is needed** (70 respondents) and that the proposed scheme is **unrealistic/it will not solve the issues** (63 respondents). A proportion of those who did not agree with licencing and those who agreed with licensing felt that the **scheme should be extended further for fairness** (72 respondents).

Figure 3: Survey comments around why respondents agreed or disagreed with introducing Selective Licensing (themed by common responses)



Impact of the scheme

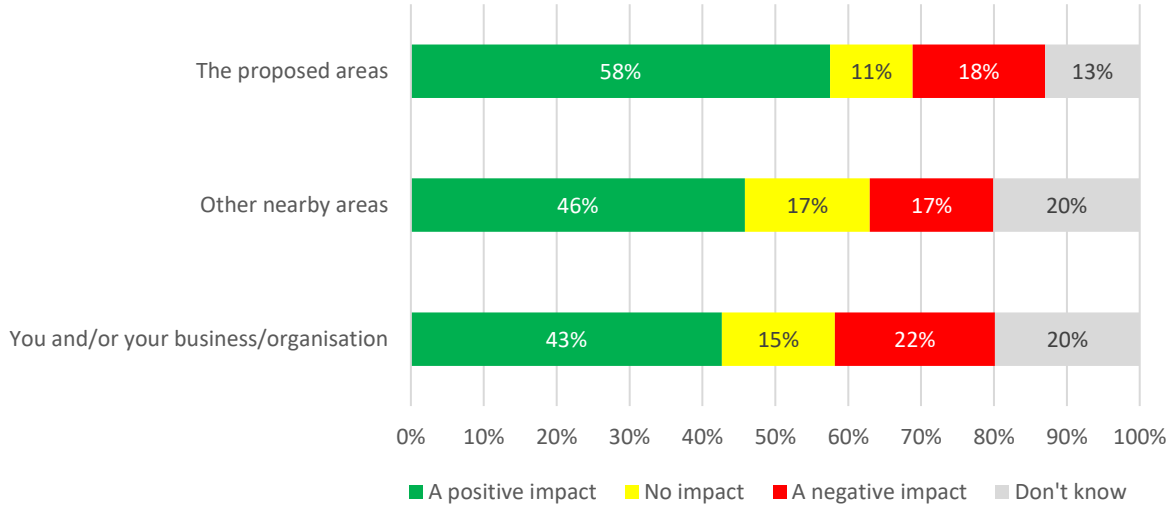
The survey then asked whether respondents felt the proposed selective licensing scheme would have an impact (positive, negative or none) on the proposed areas, other nearby areas and them individually and/or their business or organisation.

Over half (58%) of respondents felt the proposed scheme would have a positive impact on **the proposed areas**, 18% felt it would have a negative impact and a further 11% felt it would have no impact.

Around half of respondents (46%) felt the proposed scheme would have a positive impact on **other nearby areas**, whilst equal proportions felt it would have a negative impact or no impact on other nearby areas (17% each).

Finally, fewer respondents felt the proposed scheme would have a positive impact on **themselves and/or their business or organisation** (43%), with 22% stating that they felt it would have a negative impact. 15% felt it would have no impact at all.

Figure 4: Impact of the scheme (N=956)



When broken down by type of respondent, the views vary. In summary:

The majority of Landlords and agents believe that the proposal would have either no impact or a negative impact on the proposed areas, other nearby areas and themselves and/or their business or organisation. Just under six in ten (59%) felt it would have a negative impact on them and their business/organisation.

In contrast, the majority of **residents and private rented tenants** have similar views about the impact of the proposed scheme, particularly around the impact on the proposed areas (67% and 70% respectively felt it would be positive). Around half also felt the scheme would positively impact on other nearby areas and individuals and/or organisations.

All other respondents were most positive about the impact of the proposed scheme, particularly around the impact on the proposed area (74% felt it would be positive).

Figure 5: Impact of proposed scheme on the proposed areas (by respondent type)

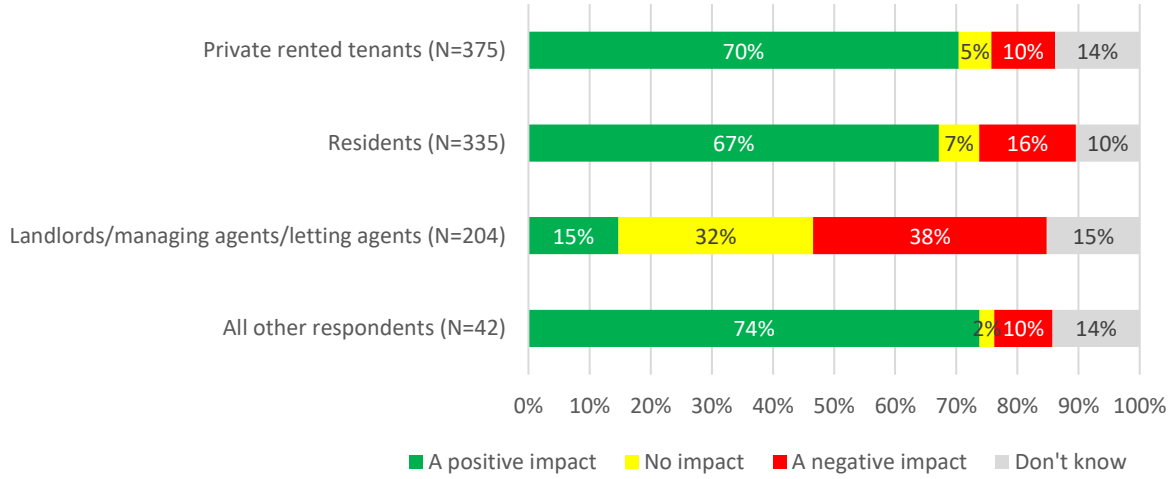


Figure 6: Impact of proposed scheme on other nearby areas (by respondent type)

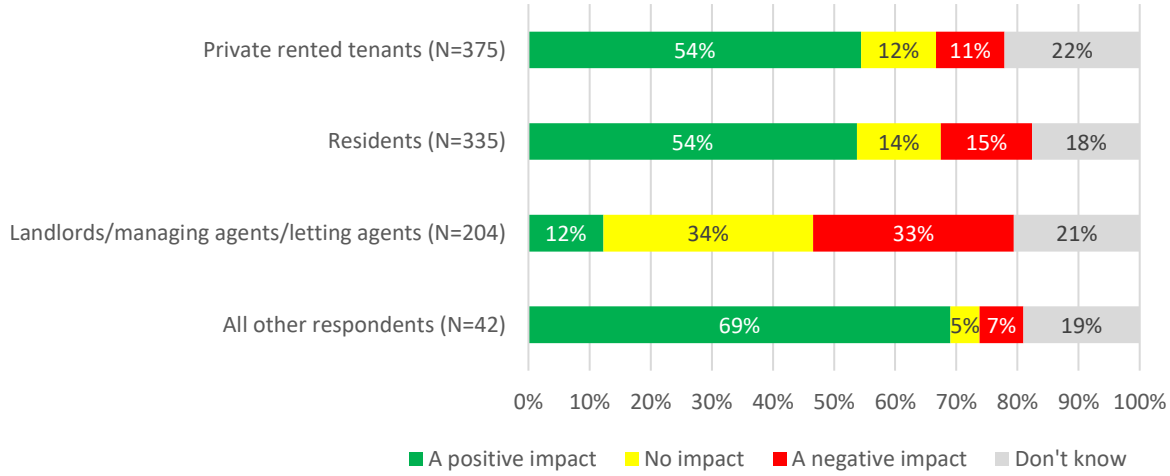
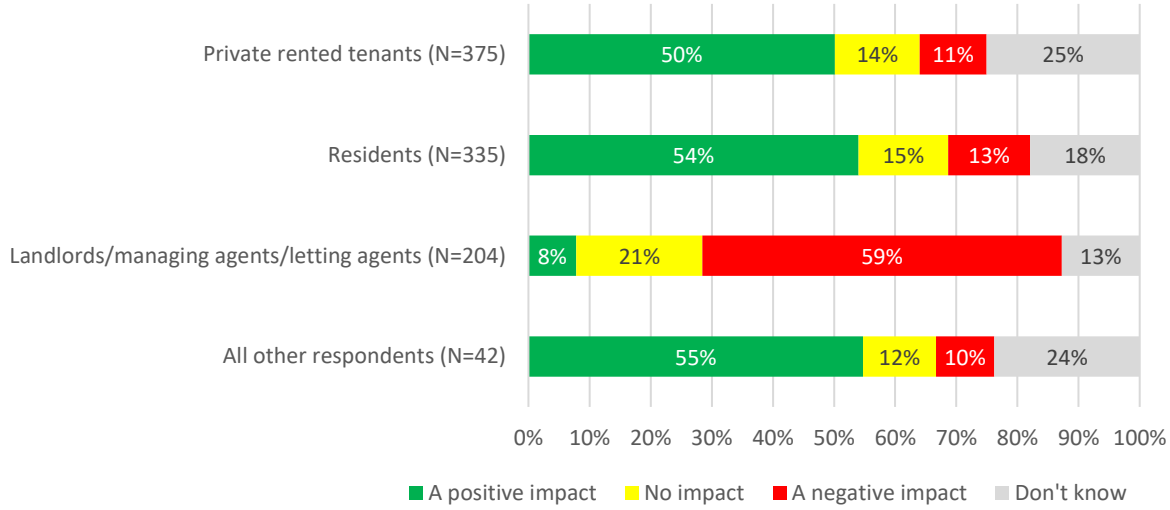


Figure 7: Impact of proposed scheme on you and/or your business/organisation (by respondent type)



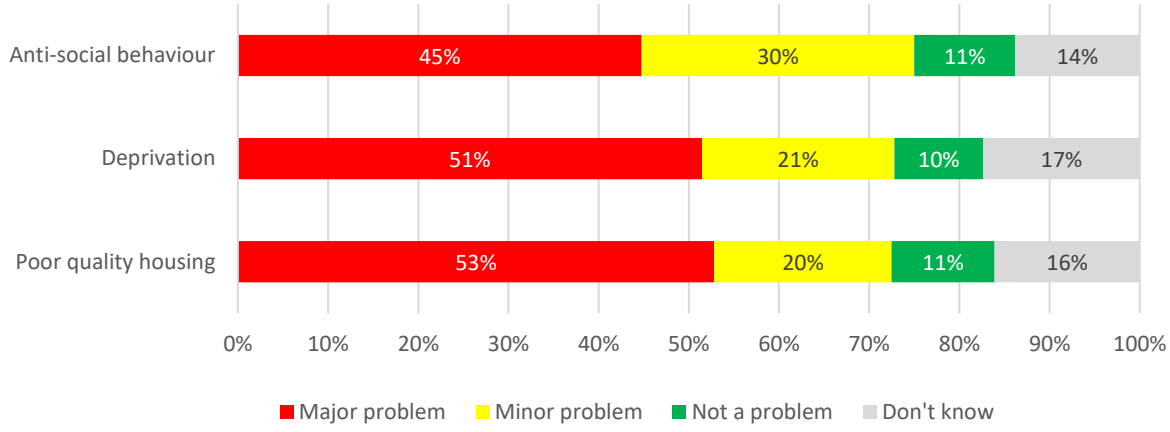
Problems in the proposed areas

The survey then asked whether respondents felt certain issues were a problem in the proposed areas for the selective licensing scheme.

Across each of these issues, around seven out of ten or more respondents stated them as a problem, ranging from 72% for **poor quality housing** up to 75% for **anti-social behaviour**, with over half (53%) stating poor quality housing as a major problem.

However, around one in six did not know whether deprivation (17%) or poor quality housing (16%) were problems and one in seven (14%) didn't know whether anti-social behaviour was a problem.

Figure 8: Extent of problems within the proposed areas (N=956)



When broken down by type of respondent, the views vary, as shown in the charts below. In summary:

Residents and private tenants were more likely to believe that these are major or problems in the proposed areas, compared to **landlords and agents**. Greater proportions of these respondents also believed these were major problems as opposed to minor problems. Poor quality housing was rated as being the largest 'major' problem by both private tenants and residents (66% and 61% respectively).

More **landlords and agents** believed that these problems were not a problem in the proposed areas or didn't know if they were a problem, compared to private tenants and residents. This was greatest for poor quality housing, with over half (56%) who felt it wasn't a problem/did not know, compared to tenants and residents (17% and 23% respectively).

All other respondents were more negative than all other groups, particularly around ASB, with 87% stating this was a problem in the proposed areas.

Figure 9: Extent of problem with ASB within proposed areas (by respondent type)

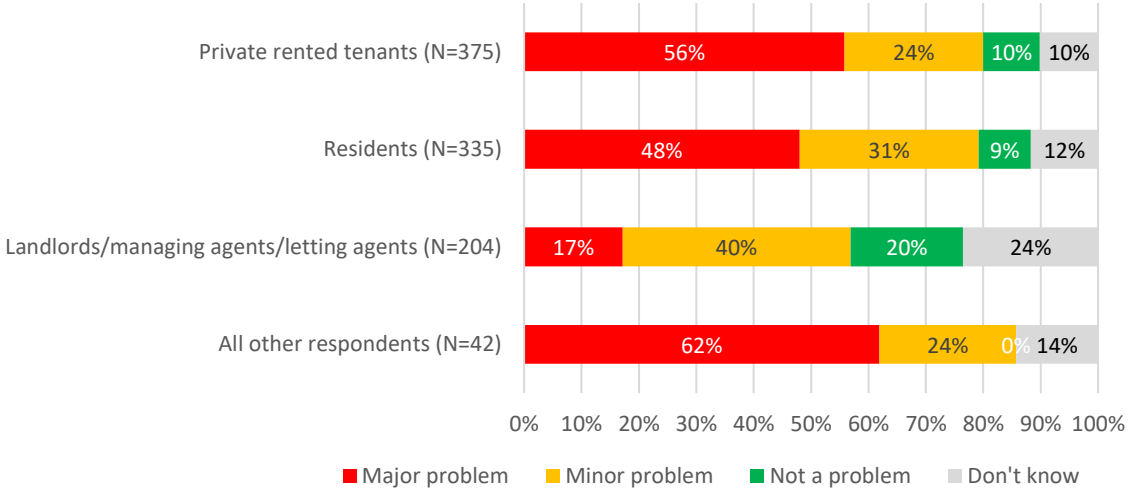


Figure 10: Extent of problem with deprivation within proposed areas (by respondent type)

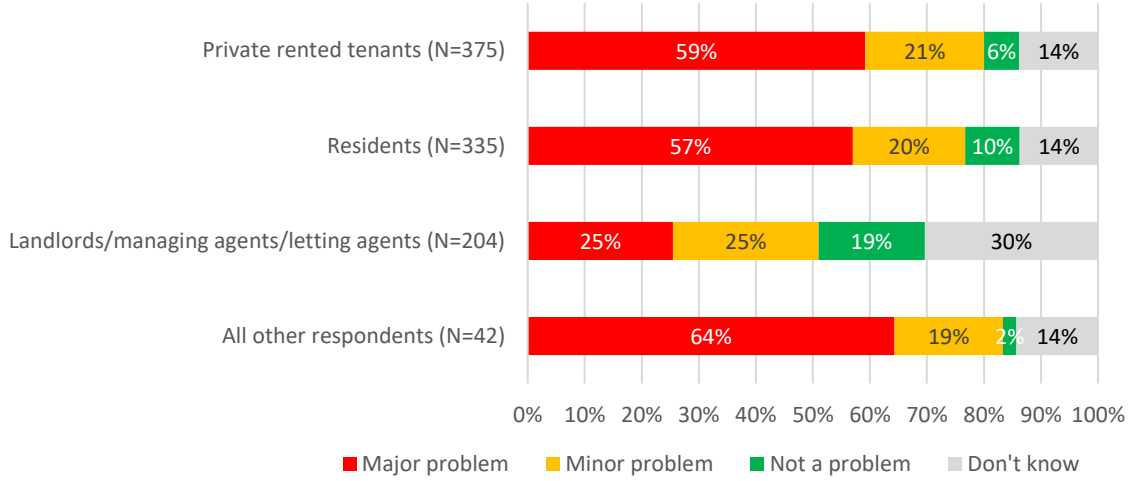
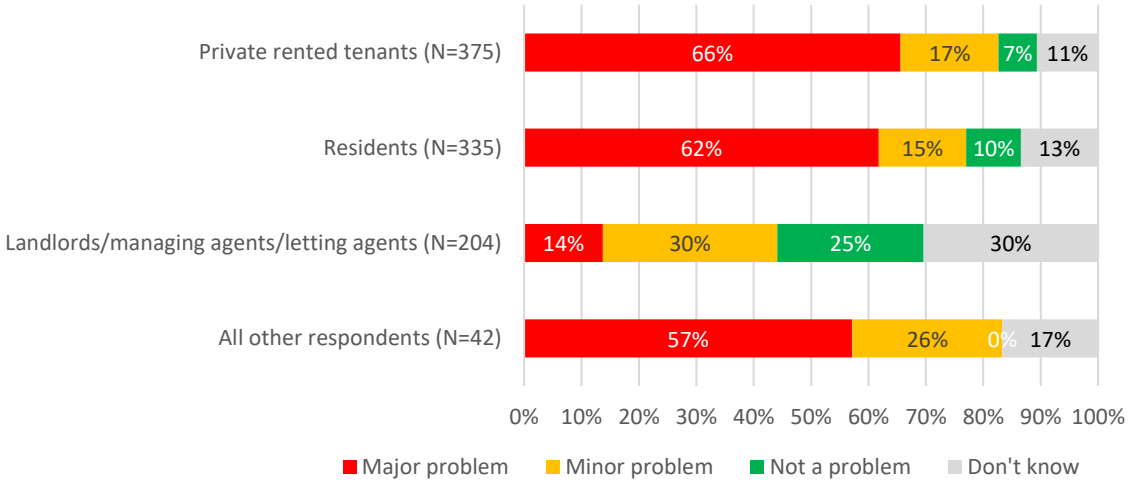


Figure 11: Extent of problem with poor quality housing within proposed areas (by respondent type)

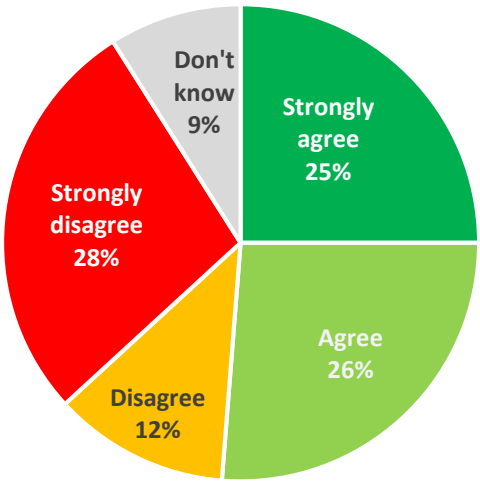


Licensing fees

Under the proposed scheme (subject to specified exemptions), all landlords would be required to obtain a licence for each of their properties. The Council would charge a fee for a licence of up to 5 years for each property. Based on current costs, those applying before the designation comes into force would pay an 'early bird' discounted fee, whilst those applying after a designation comes into force would pay £600 per property. A further £50 discount would be available for those with landlord accreditation.

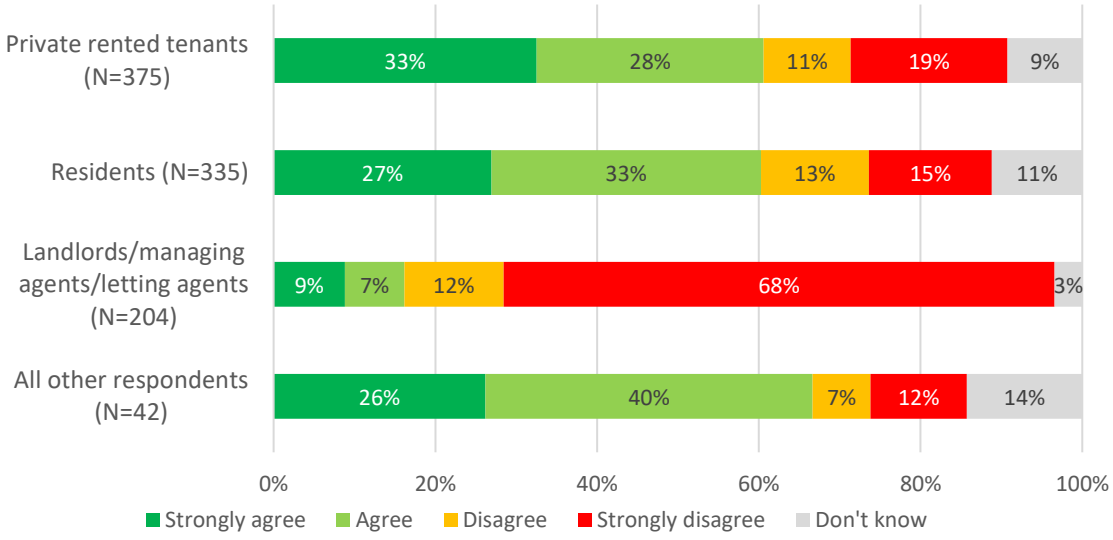
Around half of respondents (51%) agreed with the proposed fee, with 25% agreeing strongly and 26% agreeing. This compares to four in ten (40%) who disagreed, with 28% disagreeing strongly.

Figure 12: Level of agreement with the proposed licensing fees (N=956)



When we look at respondent type, six in ten **residents and private tenants** (61% and 60% respectively) agreed with the proposed licence fees, with around three in ten disagreeing. **Landlords/agents** on the other hand were not in favour, with eight in ten (80%) disagreeing with the proposed fee, whilst only 16% agreed. All other respondents were most positive, with two thirds (67%) agreeing.

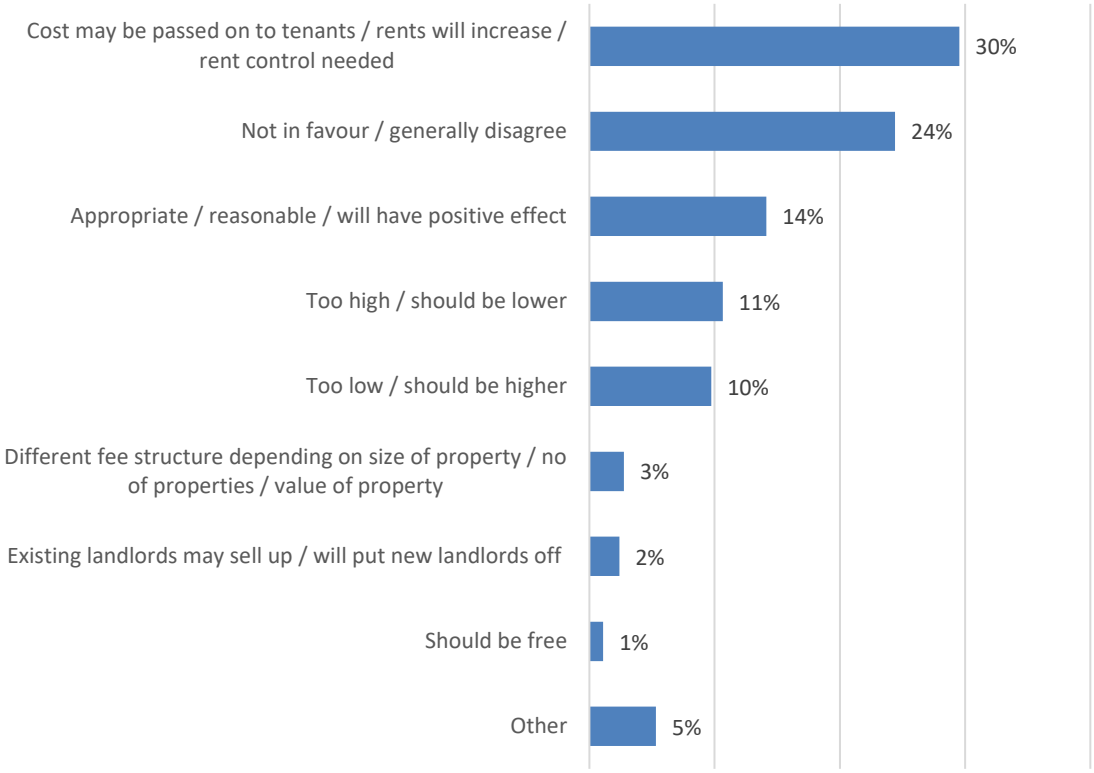
Figure 13: Level of agreement with the proposed licensing fees (by respondent type)



The survey then asked respondents if they had any comments about the proposed fees. The most common response was negative and that the **costs may be passed on to tenants, rents will increase, rent control is needed** (161 respondents). The next most frequent theme was **disagreeing/not in**

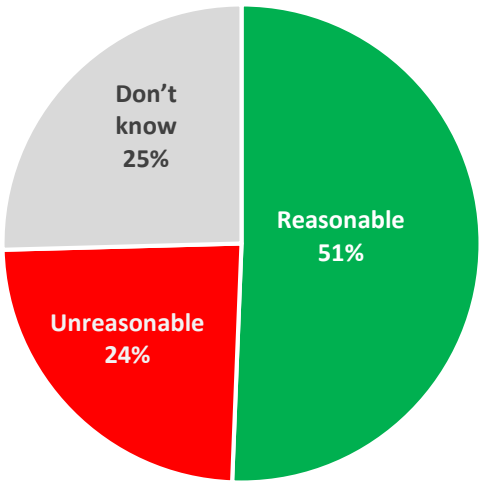
favour (133 respondents), followed by those who positively felt that the fees were **appropriate, reasonable, will have a positive impact** (77 respondents).

Figure 14: Survey comments about the licensing fees (themed by common responses)



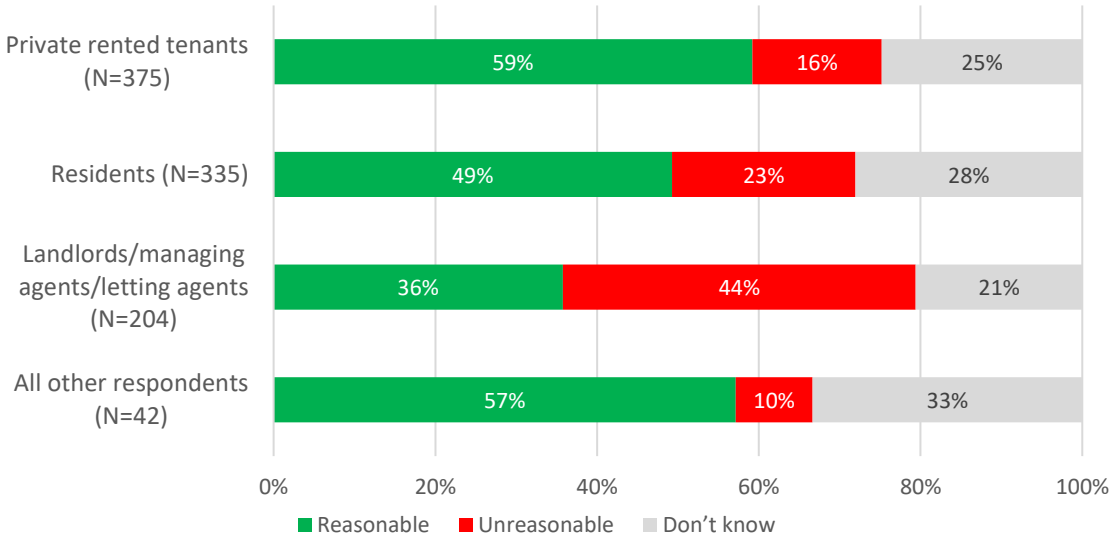
The survey also asked whether respondents felt the proposed discounts to the license fees were reasonable or unreasonable. Half (51%) of respondents thought the discounts were reasonable, whilst around a quarter (24%) felt they were unreasonable. A further quarter (25%) stated don't know.

Figure 15: Are the proposed discounts to the licence fees reasonable or unreasonable? (N=956)



When we look at results by respondent type, a higher proportion of **private rented tenants** (59%) felt the discounts proposed were reasonable, compared to residents (49%) and landlords/agents (36%). 44% of **landlords/agents** felt the proposed discounts were unreasonable. Over half of all other respondents (57%) felt the discounts were reasonable.

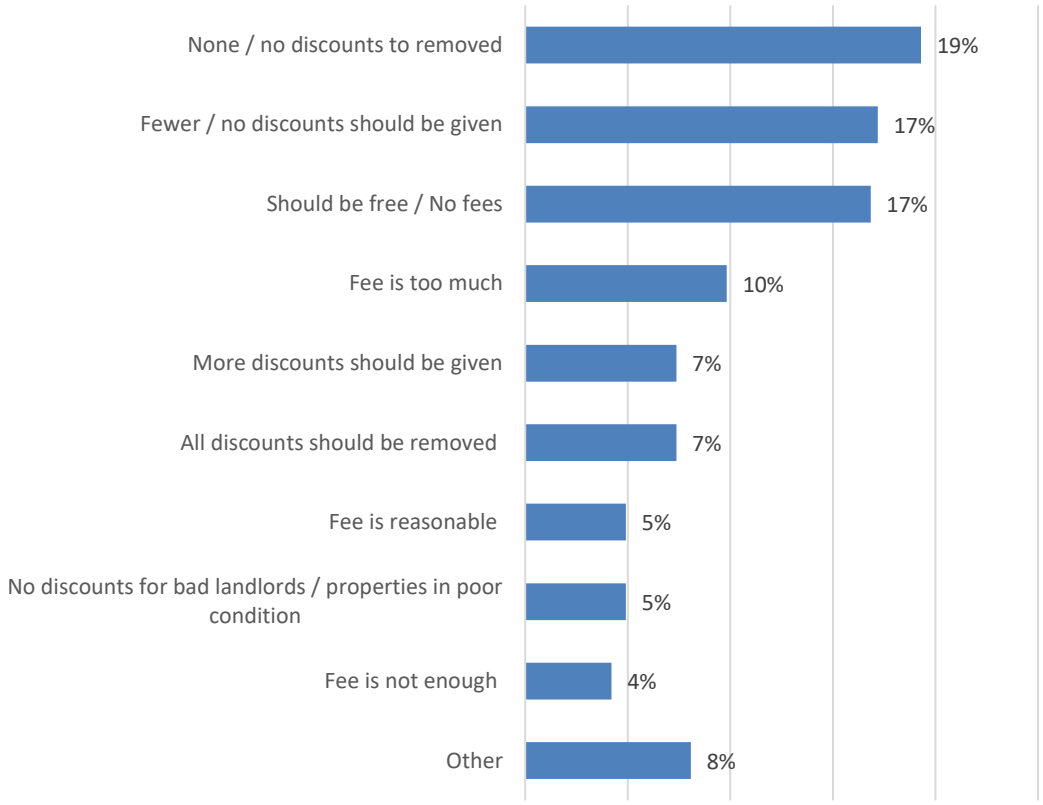
Figure 16: Are the proposed discounts to the licence fees reasonable or unreasonable? (By respondent type)



The survey then asked respondents to provide some further free text responses specifically around the discounts. The first asked respondents if they had any comments about whether there were any

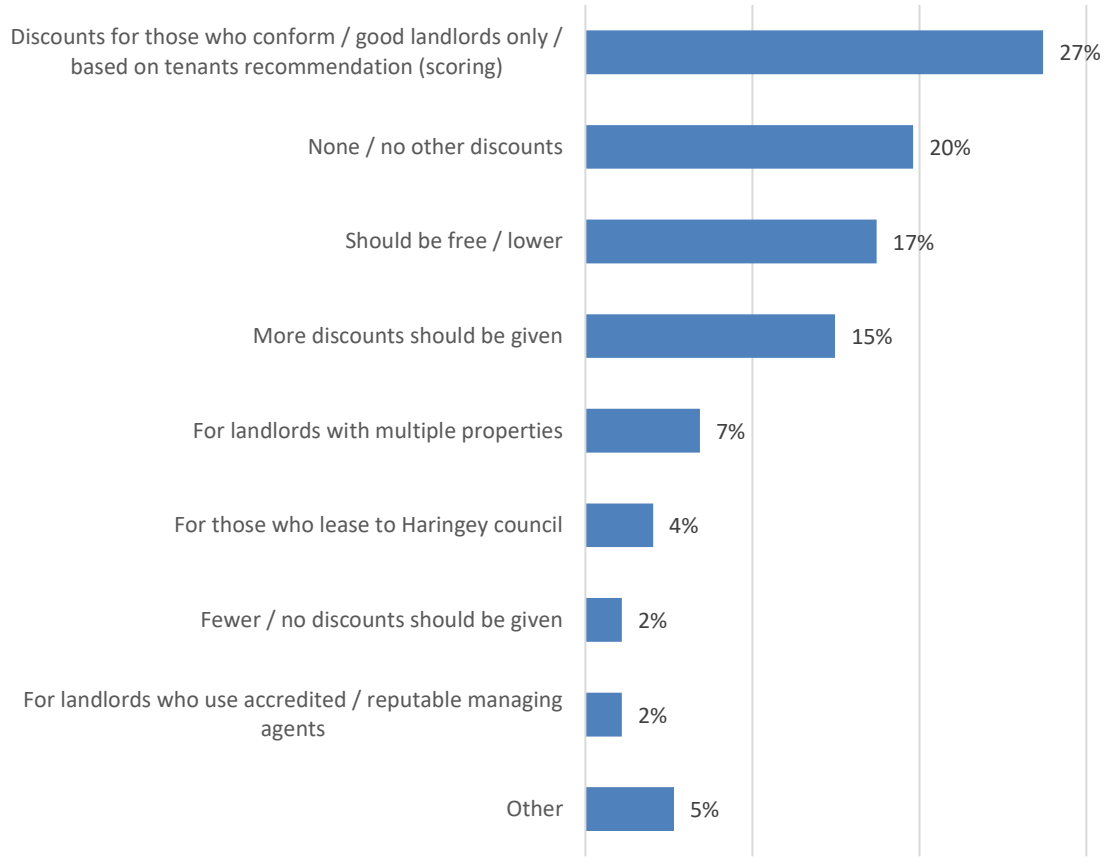
discounts that should be removed. The most common response was that **none of the discounts should be removed** (55 respondents), followed conversely by **fewer discounts or no discounts should be given** (49 respondents) and the **scheme should be free/no fees** (48 respondents).

Figure 17: Survey comments on whether any discounts should be removed (themed by common responses)



Secondly, respondents were asked to provide suggestions on any additional discounts that the Council could consider. The most common response was to provide discounts for **those that conform/good landlords only/those who tenants recommend** (88 respondents). This was followed by **none/ no other discounts** (63 respondents) or that it should be **free/lower** (56 respondents).

Figure 18: Survey comments on whether any additional discounts could be considered (themed by common responses)

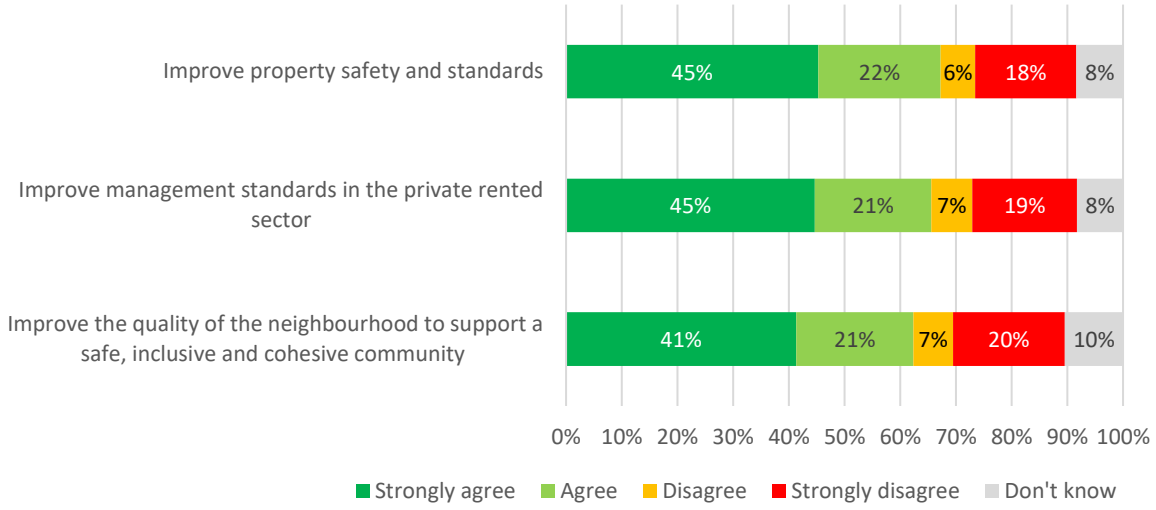


Licence conditions

The final questions in the consultation looked at the proposed selective licensing scheme conditions, which is aimed at ensuring licensed properties are safe and well managed.

The survey asked respondents to state the extent to which they agreed or disagreed that the proposed conditions would **improve the quality of the neighbourhood**, **improve property safety and standards** and **improve management standards**. Over six out of ten (62-67%) respondents agreed with the proposed licence conditions to improve these aspects, although around a quarter (24-27%) disagreed, with most strongly disagreeing.

Figure 19: Level of agreement with proposed conditions (N=956)



When broken down by type of respondent, support for the proposed conditions varies, as shown in the charts below. In summary:

- Support was strong from **residents and private tenants**, with at least seven in ten in agreement with the proposed conditions to improve the quality of the neighbourhood, property safety and standards and management standards.
- On the other hand, most **landlords and agents** disagreed with the proposed licence conditions, (with between 59%-64% disagreeing).
- All other respondents were most positive, with over eight in ten in agreement that the conditions would improve the various aspects.

Figure 20: Level of agreement with proposed conditions to improve the quality of the neighbourhood (by respondent type)

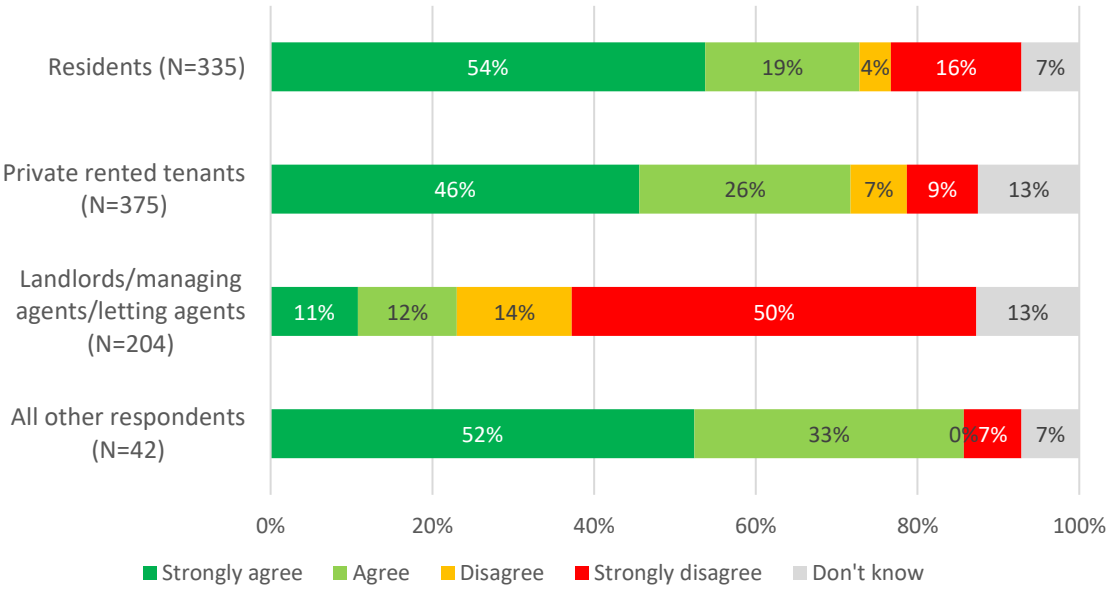


Figure 21: Level of agreement with proposed conditions to improve property safety and standards (by respondent type)

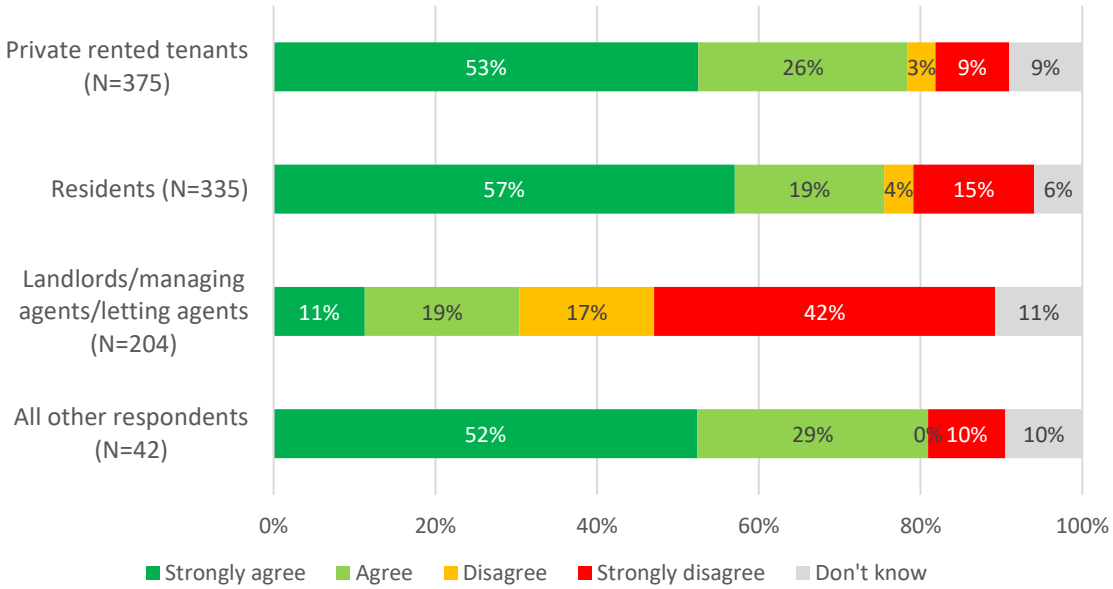
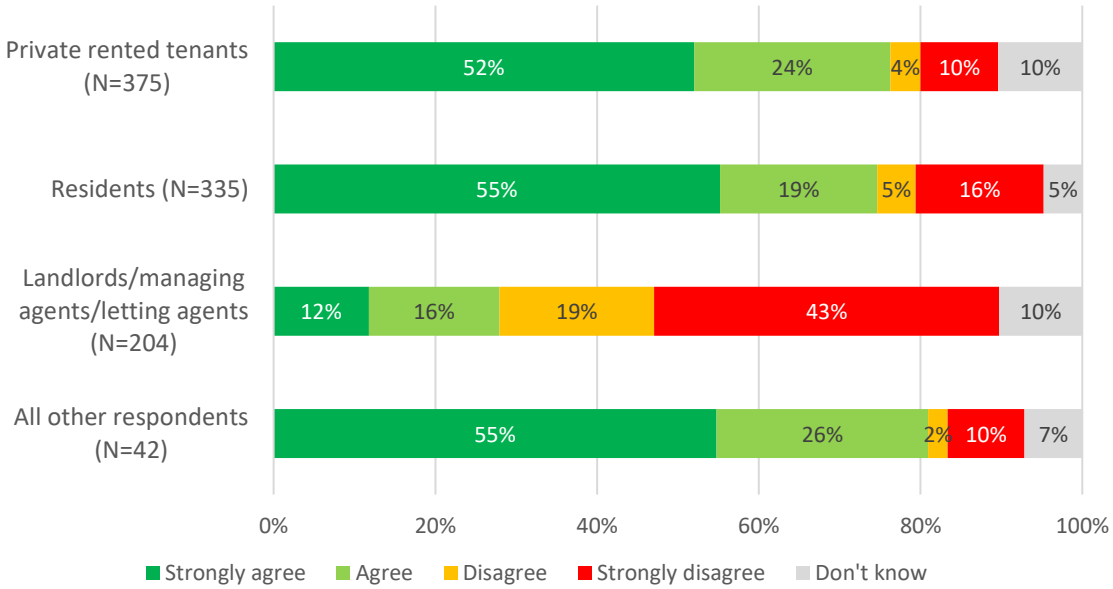
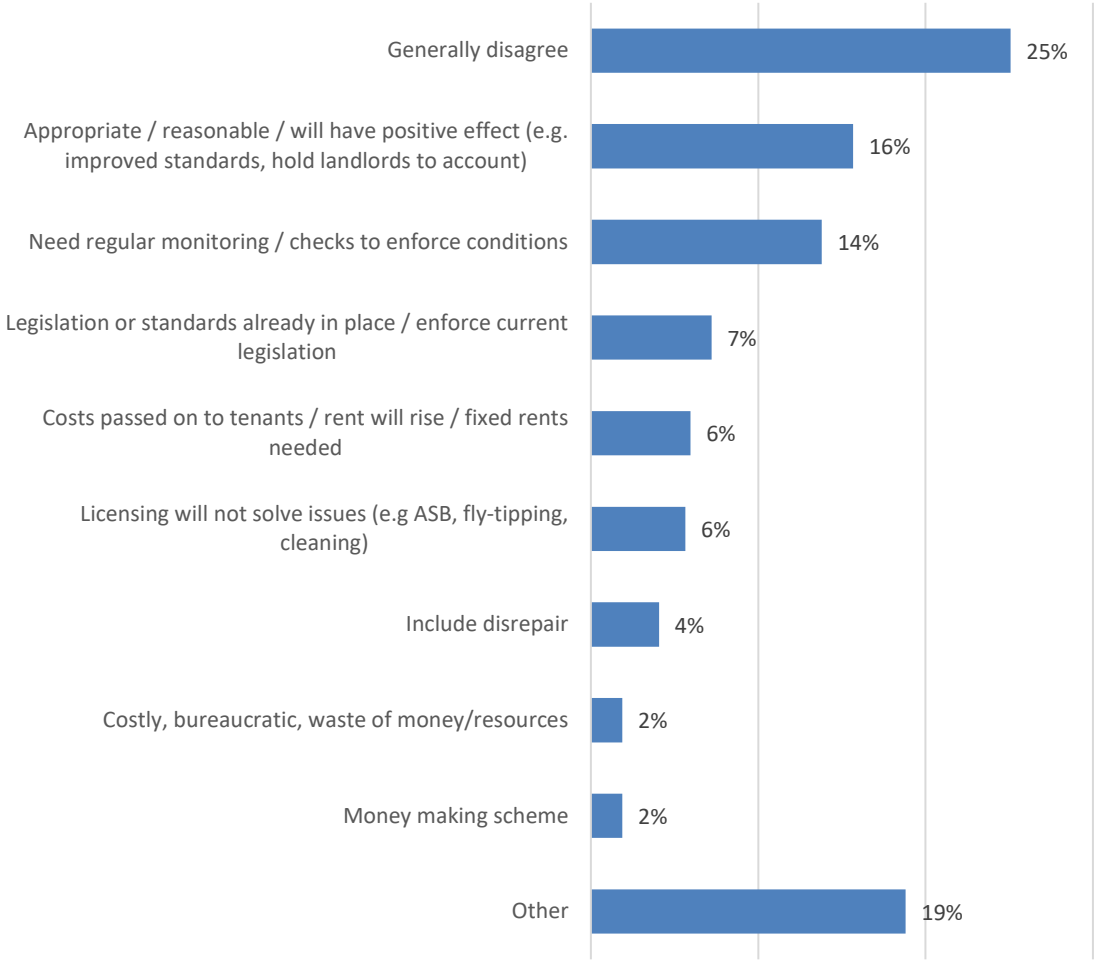


Figure 22: Level of agreement with proposed conditions to improve management standards (by respondent type)



Respondents were asked if they had any specific comments about the proposed licence conditions or any suggestions for alternative or additional conditions. The most common response was to **disagree with the scheme/conditions** as a whole (80 comments). This was followed by 50 respondents who felt that the conditions were **appropriate, reasonable, will have a positive effect** (e.g. to improve standards and/or hold landlords to account). Following this, 44 respondents mentioned a need for **regular monitoring and checks to enforce the conditions** set out in the proposals.

Figure 23: Survey comments about the proposed licence conditions and other suggestions for alternative/additional conditions (themed by common responses)

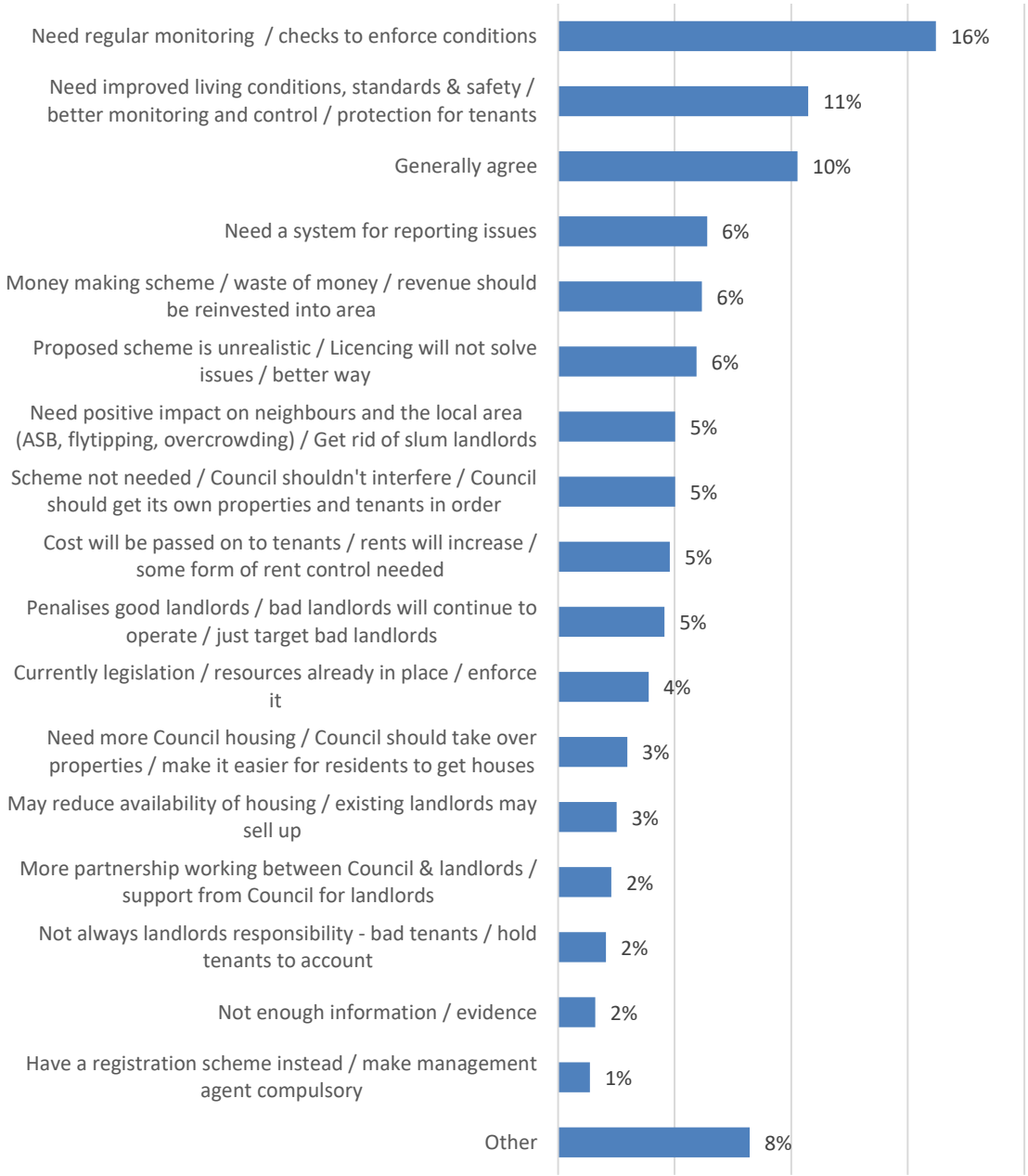


Other comments and suggestions

At the end of the survey, respondents were given the chance to provide any other comments on the proposals or any suggestions for alternative ways of dealing with problems in the areas or any ideas for improving the proposed scheme. These are shown below, mirroring many of the open-ended comments already seen in this report.

The most common was that it was vital to regularly **monitor the scheme and have checks in place to enforce scheme** (71 responses), followed by a need to have **improved living conditions, standards and safety, better monitoring and control and/or protection for tenants** (47 responses). Following on from this, a similar number of comments **generally agreeing with the scheme** (45 responses).

Figure 24: Survey comments for 'any other comments on the proposal/ suggestions on alternatives (themed by common responses)



Public meetings

Three public meetings were held as part of this consultation, all online due to the COVID-19 restrictions, on the 5th, 16th and 21st July 2021. These offered people the chance to hear and see the proposals outlined by Haringey Council, to ask questions and to put forward their views. In total, 27 people attended the meetings, whilst 41 booked to attend. Here is a summary of the key points.

Scheme overall

A few participants asked how landlords are going to be forced to come forward and how the Council will ensure that not just good landlords take part in the scheme.

Some participants were unclear who would need a licence, the cost if you have a number of properties, and whether it would affect properties already licensed under the Additional/Mandatory (HMO) schemes.

Some were unsure what the licence conditions covered (such as whether there would be minimum sized rooms required) or whether families would be evicted if the property/room sizes/number of households in a property do not meet the criteria set.

Proposed wards

Some participants asked why some areas were in and others not when the evidence proposed showed mixed evidence that could include/exclude wards (for example Hornsey being in, but Crouch End being out).

Fees

A few participants commented that the costs to landlords will be passed to tenants in rent increases, therefore making it not just a tax on landlords, but on renters.

Some questioned how the fees were calculated and how many staff need to be employed to run the scheme/enforce it.

Impact

Some questioned the negative impact that this may have on landlords, and suggested that some may leave the sector, therefore reducing the number of properties available to rent.

One tenant asked how the Council is going to protect the scheme from hurting tenants, as they will be affected by fees being passed onto them and also any retaliations if they do complain to the Council about their landlord.

One participant asked how impact is going to be measured (such as what KPIs are going to be in place), whilst another asked whether the Council will track changes in private rental availability as a result of the scheme.

Stakeholder views

We spoke to 7 stakeholders representing mainly the Council and those who work with tenants in Haringey. 5 other stakeholders were invited to take part in an interview. The list of these organisations is provided in Appendix 4. Here is a summary of their views.

Views overall

Haringey Council's ASB and Enforcement team were in favour of the scheme, particularly if the Council are able to identify who the landlord/responsible person is and deal directly with them. They would prefer working with landlords, ensuring they understand what they need to do and they have provided tenants with the information they need.

Haringey's Cabinet member felt the scheme was something that was supported by most Councillors and needed to tackle PRS housing standards in Haringey. They felt that it would be extremely important that if it were to go ahead that both landlords/agents and tenants should be made aware of it.

Citizens Advice welcome the scheme and felt that the private rented sector has been neglected for years. They felt that there are some assumptions around the PRS that are incorrect in Haringey and a lack of understanding of the reality of the sector, and that there needs to be much greater engagement with the sector.

The NRLA said they would support something if it was deliverable and was delivered. However, they felt that if Haringey want to improve the area and tackle the underlying problems, then this needs to be inspection led and they have to inspect all the properties. They had little confidence that this would be the case, nor that the Council could deliver it with the resources that they could afford with the budget.

Cambridge House was supportive of the scheme, although felt that it would be better to do a borough wide scheme (as bad landlords can own properties anywhere). They support it because regulation is weak, and licensing is the only tool that local authorities have to be proactive. They did feel however, that there should be an inspection of all properties before granting a licence.

Haringey's Public Health team felt housing is a crucial indicator of poor health and inequalities, so improved housing is extremely important to tackle these issues. Poor housing and low incomes are among the factors with the greatest negative impact on health in some of the most deprived areas of Haringey, therefore they felt licensing is important to tackle these issues and make landlords raise poor standards and more easily identify criminal landlords. They felt it was a positive response to improving the health of residents.

Haringey Council's Waste team were also supportive of the scheme and felt that licensing brings some responsibility on landlords and brings them on board, as it is in their interest to have a nicer street scene and a better reputation of their neighbourhood.

Proposed area

The NRLA believed that local targeted approaches were most effective, especially those based on evidence, rather than broad brush approaches.

A number of stakeholders felt that a borough wide scheme would be easier to deliver, as all landlords renting properties to private tenants would need to have one form of licence or another, and would reduce confusions about areas, roads, wards etc where only specific licensing exist. Others however, felt that it would be difficult to justify as some areas don't have the same problems with the private rented sector as other areas in the borough.

Haringey Council's Waste team felt that fly tipping is more of a problem in the East side of the borough, particularly around white goods, furniture particularly when moving out and the PRS is a big part of the problem, therefore they felt that placing some responsibility on landlords is really important.

The Public Health team felt that the inequalities in the borough shouldn't be widened by excluding the West of the borough to such an extent, as there could be hidden pockets of deprivation that the Council isn't aware of, as most Council activities focus on the East side of the borough. However they recognised that the evidence isn't showing that a borough wide scheme would be feasible and therefore could be rejected.

Fees

All stakeholders felt that the fee was affordable for landlords. One said it was a 'pittance' compared to the rent levels that are charged in the borough, whilst another felt the fee is not the issue, it is the fact that the local authority is involving themselves in their business matters that landlords don't like.

Citizens Advice said that they liked the idea of rewarding landlords for coming in early to the scheme. They felt that the fees would be passed onto tenants from a small proportion of landlords, not all, as they have seen evidence of that elsewhere. However, they were also concerned that it would not cover the inspection/enforcement that would be required for such a sizeable scheme.

The NRLA didn't feel the fees stacked up and were too low. They also suggested the way these had been laid out was incorrect, for example Part A and Part B of the fees, where they felt there was little evidence that they had split the fee. A discount within a fee was also questioned and felt this was illegal (under Gaskin ruling). They felt there could be better ways to reduce the burden on landlords (like a monthly direct debit).

They also felt that the Council would not have enough resources to deliver the scheme, therefore they felt the scheme was effectively a tax on landlords.

Licence conditions

The ASB and Enforcement team for the Council believed that landlords can't be told to deal with all these issues alone (dealing with ASB and rubbish etc…) and should not be expected to (but work

in partnership with the appropriate agencies), but they need to do the minimum that is required of them.

This was echoed by Haringey Council's Waste Management team, who felt that they couldn't bring landlords to task for some issues, such as fly tipping, but need them to adhere to the basic requirements (keep their land clear and have adequate waste storage). They felt that licensing gives them another tool, but the first port of call would be to tackle the perpetrator and then speak to the landlord if they couldn't. The team highlighted the need to bring landlords on board to deliver their ambitions for a clearer street scene.

Impact of the licensing scheme

Citizens Advice referenced schemes in other areas of London that have worked successfully including Croydon and Newham but felt any licensing scheme needs to be part of a wider approach.

They also felt that there is not a significant amount of evidence that Haringey uses enforcement powers enough, and that a licensing scheme needs to be part of an approach, not a panacea itself.

The NRLA didn't feel that Haringey can deliver the scheme because there were not enough resources to do this properly as an inspection-led regime. They also felt that evidence from the other schemes was that Haringey don't do the inspections.

Haringey Council's ASB and Enforcement team felt that the impact could be great if they can work directly with landlords as soon as issues are identified. There needs to be a collaborative approach, rather than a dictatorial approach to get things improved. Enforcement should only happen as a very last resort.

One concern raised by Citizens Advice was that there could be a negative impact, or perceived negative impact within some communities around insecure immigration status if licensing is seen as a tool for immigration to use. This could mean very vulnerable groups that the scheme needs to help may be more reluctant to engage.

Cambridge House – Safer Renting who deal with private rented tenants felt that having a proactive approach to enforcement is vital from an equalities perspective. Many minority ethnic groups are not being reached via a reactive enforcement approach, so this will improve if a proactive approach is taken.

Haringey Council's Public Health team had come across some very poorly managed private rented properties (including one bedroom flats which clearly didn't meet standards), mainly housing vulnerable tenants at the bottom end of the market.

Alternatives

Cambridge House – Safer Renting felt that there are limited local tools available to local authorities as a viable option. They didn't feel that co-regulation had been shown to work to deal with poor landlords, and only typically involved the landlords that were already engaged. They therefore felt that Article 4 direction and licensing were the only credible tools available to use to 'regulate' the private rented sector.

Wider comments

Citizens Advice felt strongly that there needs to be a better dialogue with local landlords for schemes to work. They also felt that some of the assumptions about the PRS need to be challenged particularly amongst local politicians, particularly as there are a lot of young and vulnerable people living in the PRS in the borough.

They also felt that there needs to be much greater communications and publicity going out to tenants, as most seemed to be unaware of their rights.

They also felt that it would be useful for the Council to set out its enforcement strategy, as they have a lot of discretion about whether they are going to take more informal or formal measures. Also setting targets on no of inspections etc would be useful.

The NRLA felt that there is enough evidence around what schemes have worked and in what context – they suggested Leeds and Great Yarmouth were examples of how selective licensing can work and suggested that Haringey speak to them. They felt that inspection-led regimes are those that are most likely to succeed as they target all properties, not just giving a licence (NB they are happy to speak directly to Haringey regarding any of these points).

They also felt energy efficiency would need to be built in at some point, as this is coming round the corner.

Cambridge House - Safer Renting suggested focusing resources as part of the licensing scheme on dealing with rubbish/litter on main streets/thoroughfares would help to raise standards.

They also felt that streamlining the application/paperwork processes for landlords/agents may help and also cut down admin time for the Council.

The Public Health team felt that bad landlords are less likely to licence their property, but that would then make it easier to identify problem properties which haven't been licensed and allow Council resources to be more targeted in dealing with these. They also felt that vulnerable tenants would be more likely to feel confident that they could report bad landlords and substandard properties, as they are less likely to have a licence.

Finally, most of the Haringey Council teams mentioned different strategies that they are working on, which support the improvement of neighbourhoods and standards across the borough, which include supporting the private rented sector landlords and tenants to know their responsibilities and give the Council more power to deal with issues proactively.

Written responses

We also received written responses from 36 individuals or organisations either via email or letter. The organisations that submitted formal responses are listed in Appendix 5. We have summarised these into themes below and included the full response as a separate Appendix. The Council will consider and respond to the representations in the written responses in the Council's response to representations, which will be published alongside the final proposal considered by the Council's Cabinet.

Penalising good landlords

The majority of landlords who submitted written responses to the consultation were objecting to the scheme. Many felt they were being financially penalised (by being required to licence their property and pay a fee) because of a minority of bad landlords, who were unlikely to licence their properties anyway.

> "Bad landlords get away with providing poor accommodation and bringing in this policy will not change that, the council should put their efforts in to dealing with them rather than penalising good landlords".

This view was supported by a couple of tenants who felt their experience of landlords had been positive and felt they shouldn't have to be paying more money.

> "… all this does is decrease any profit made by the landlords who sign up to the scheme - who are probably the ones who run them properly; which in turn makes it difficult for the landlords to reinvest in properties to help the upkeep unless they increase rents in line with the fees (which goes back to the cost continues back to the tenant... My personal experience to date is that landlords have been brilliant because I choose a property that looks well kept".

Rent increases

A number of comments were around concerns with fees being passed onto tenants in the form of rent increases, which will affect those who are already struggling and could force them into a more difficult financial situation:

> "[The] scheme is likely to cause hardship and deprivation by forcing rents up and leading to increased homelessness at a time when the economy is already struggling. The 600 fee is high, and it is likely that landlords will recover the cost by increasing the rental price".

Others felt that adding increased costs onto landlords will result in some pulling out of Haringey and this will mean rents could increase if fewer properties are available to rent:

> "Licencing will only reduce the number of landlords / up their costs which ups the costs to tenants".

Landlords need to be held to account

Most agree that there are unscrupulous landlords that need to be dealt with. A number of tenants provided responses supporting the scheme and suggested that whilst they had requested repairs to be made, these requests were not being dealt with. They also didn't know where to go for help/support to deal with this.

> "I have all sorts of problems getting the landlord to do the most basic repairs I would like some info who could help me deal with it etc. Main problem is draughty old fashioned windows and it is impossible to heat it goes straight out and I have come up in the morning to 5C in the winter. I would like to add my voice to the various issues you are trying to tackle".

One landlord was also supportive of the scheme, saying that it would create a more level playing field in areas across all private rented properties and for landlords:

> "As a landlord I'm highly supportive of a licensing scheme - for all landlords, not just landlords of HMOs. It would set clear guidelines for me and tenants, and reassure my tenants about the experience they should expect".

Issues with social housing

Several respondents felt that licensing was not enough to deal with the issues it is looking to tackle and that there were much larger social issues that needed to be addressed, particularly around a lack of social housing and poor social housing stock.

> "… much of what I have experienced is not as a result of the Private Rented sector, but a lack of investment & neglect from the local council and government over the decades. Moving in poverty stricken families into the area then forcing them into the private rented sector instead of providing them with the social housing they need and deserve to give them stability of knowing they have a permanent home".

Others felt that just trying to target the private rented sector was insufficient and that homeowners and also social housing should be equally held to account for the same problems:

> "I can understand that you would like to eliminate certain behaviours by bettering the condition of properties, but this should apply to all tenanted properties NOT JUST PRIVATELY RENTED... "

One landlord put more blame on the social housing sector, managed by the Council, than the private rented sector.

> "Landlords who rent out sub standard properties are rare, in fact council managed properties are far more neglecting than those in the private rental sector".

Scheme wards/questioned

A number of respondents queried the evidence around the selection of the 14 wards. Some felt that this was too wide and 'scattered' and felt it would be better to have a pilot area to test the scheme on first. They also felt that some wards don't really meet some of the criteria, such as deprivation.

> "If they are going to do this they should start with something very local to see if it works in the areas worst affected. Some of the wards are not very highly deprived like Stroud Green or St Ann's or West Green - it is too broad-brush".

Another respondent questioned the inclusion of their ward particularly around private rented tenants (or at least those who are not HMO tenants) being responsible for the reported levels of ASB:

> "I would like my view to be represented that I don't believe antisocial behaviour is such a problem in my ward- West green and I think it is social tenants who cause the most trouble. Not small flats with professional couples - who make up tenants in properties that aren't HMO".

Council should use existing powers

A number of respondents felt that the Council already has the powers at its disposal to deal with the issues raised and questioned why a scheme is needed.

> "Councils already have the authority to tackle low standard accommodation and take action against offenders. Clearly they are failing in their duty".

One respondent felt that the Council should not be making landlords responsible for things like fly tipping and ASB which are the responsibility of the Council and other authorities.

> "I would like to express opposition to any proposed landlord licensing scheme in Haringey and attempting to make Landlords responsible for illegal dumping of rubbish and antisocial behaviour. These are offences which the Council and Police should be directly responsible for, not Landlords who should only be responsible for ensuring their properties are well-maintained. I find it utterly cynical and disgraceful that the Council is attempting to shift their responsibilities in law enforcement and waste management to Landlords in a scheme which would likely backfire long-term as Landlords decide to sell their properties, evict their tenants, and also pass on higher rents due to licensing".

Evidence and consultation questioned

Finally, a couple of respondents questioned the evidence and data upon which the business case has been based, as well as the consultation. A response from the Haringey Leasehold Association criticised the evidence and felt it did not meet the legislation for selective licensing, citing the data used is not recent enough and that the evidence doesn't show a correlation to the private rented sector:

> "… the evidence does not show that this [ASB] is correlated with PRS. It is just asserted that levels are high but there is no comparison with complaints from the social sector for instance".

Another respondent also argued that the data regarding ASB did not show a strong correlation with the private rented sector or how it compares to other types of tenure:

> "Supporting documents on the Council website suggest a strong correlation between private rented property and anti-social behaviour, but seem to offer no evidence for this being a greater problem than in Council or housing association properties, for instance... are there any ASB statistics for non-privately rented property?"

All responses to the consultation have been provided to the Council.

Experiences in Haringey

The opening section of the survey looked to understand views and experiences of respondents around some key issues in Haringey that the selective licensing scheme is looking to improve within the private rented sector. These included:

Housing conditions in Haringey

Deprivation in Haringey

Antisocial behaviour in Haringey

This section looks at responses to each of these in turn.

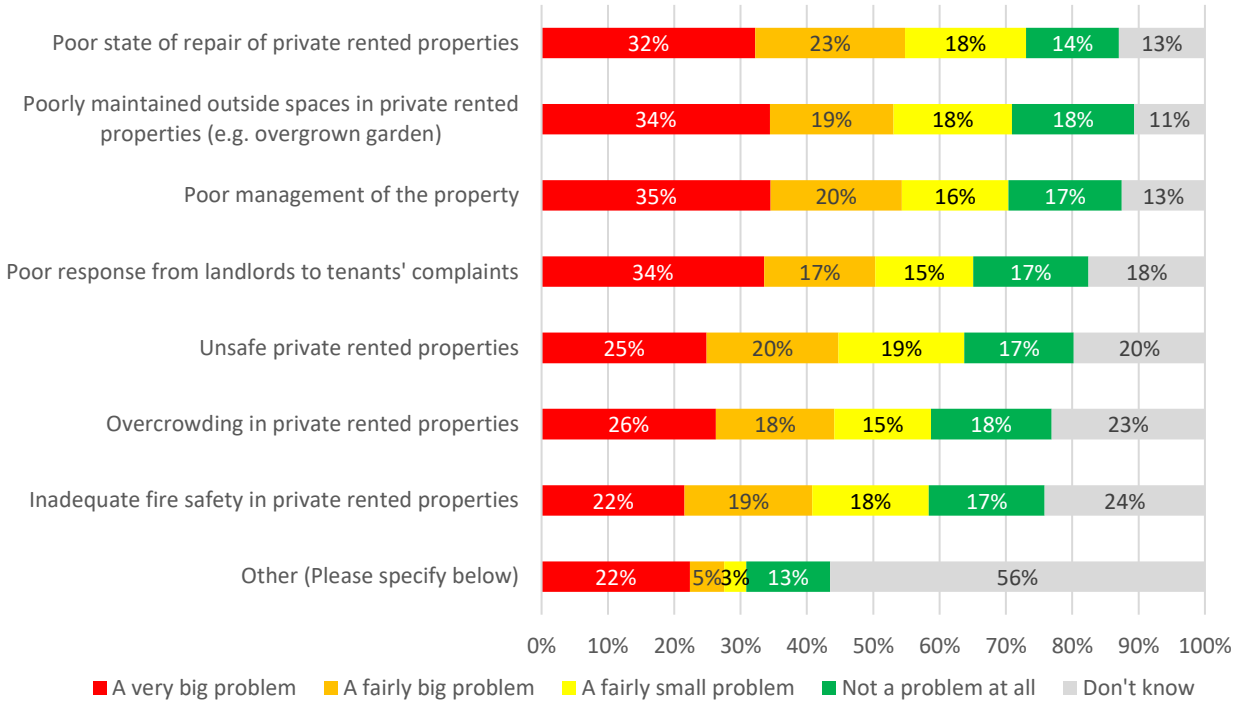
Housing conditions in Haringey

The Council believes that introducing selective licensing will help them to tackle issues of poor property conditions in the 14 wards.

Respondents were given a list of issues associated with poor housing conditions and property management, and asked to state the extent to which they felt they were a problem in Haringey.

The most commonly felt problem was with the poor state of repair of private rented properties (73% felt this was a problem), followed by poorly maintained outside spaces in private rented properties (71% felt this was a problem) and poor management of the property (70%). Between 14-18% of respondents did not feel/did not know that these were problems in Haringey.

Figure 25: To what extent are these problems in Haringey (Poor housing conditions)? (N=956)



Respondents were then asked to state which wards in Haringey they felt these issues were a concern (multiple choice). The most popular response was the 'whole borough' (32%) followed by around a fifth (21%) who said this wasn't applicable (i.e. they didn't feel this was an issue in the wards or didn't know). Seven Sisters (18%), Harringay (17%) and Tottenham Hale (14%) were the top three wards selected by respondents. Muswell Hill (3%), Alexandra and Fortis Green (2%) were the bottom three, with very few stating these have problems.

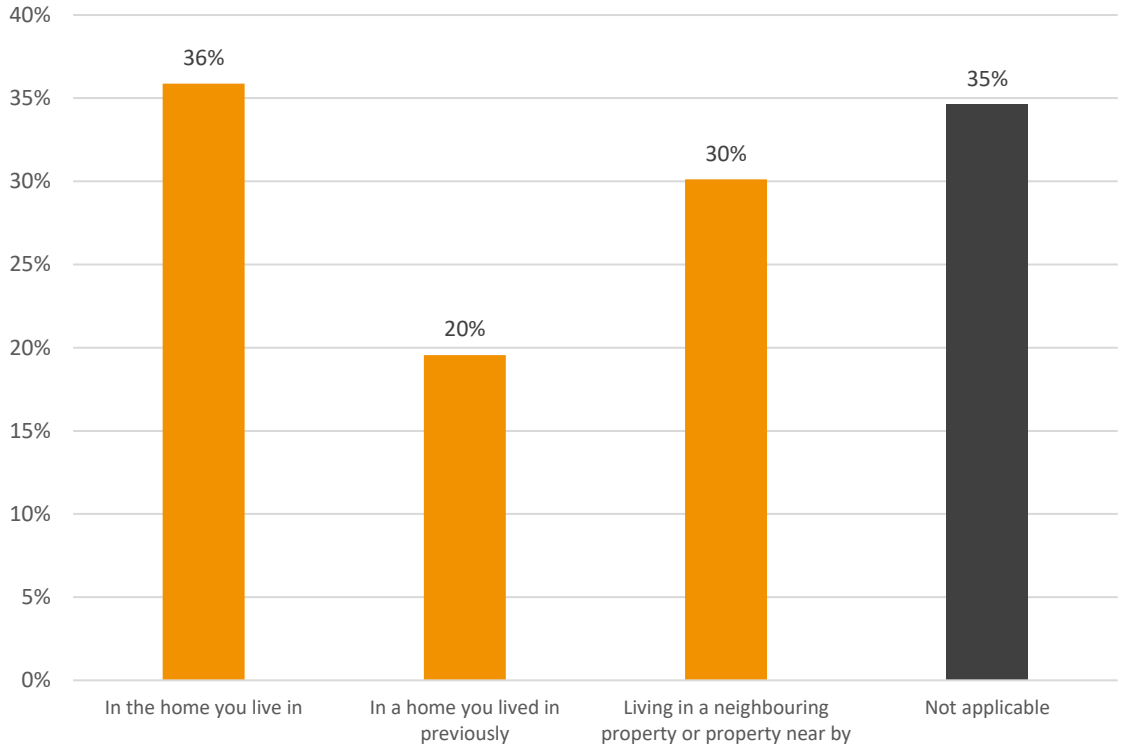
The 14 wards that the proposed scheme would cover, were ranked as the top 14 wards. However, the proportions for several are very low, in particular Noel Park (7%), Hornsey (7%), Woodside (6%), Stroud Green (5%) and Bounds Green (4%).

Table 6: Where in Haringey are these issues a concern (Poor housing conditions)? (Multiple choice) (N=956)

Ward	%	Within proposed scheme?
Whole borough	**32%**	-
Seven Sisters	18%	Y
Harringay	17%	Y
Tottenham Hale	14%	Y
West Green	13%	Y
White Hart Lane	13%	Y
Bruce Grove	12%	Y
St Ann's	12%	Y
Tottenham Green	12%	Y
Northumberland Park	12%	Y
Noel Park	7%	Y
Hornsey	7%	Y
Woodside	6%	Y
Stroud Green	5%	Y
Bounds Green	4%	Y
Crouch End	3%	N
Highgate	3%	N
Muswell Hill	3%	N
Alexandra	2%	N
Fortis Green	2%	N
Not applicable	**21%**	-

Respondents were then asked whether they had experienced these issues in Haringey in the past 5 years. Around a third (35%) of respondents said that this was not applicable (or they had not experienced this), whilst 36% said they had experienced this in the home they live in and three in ten (30%) said they had in a neighbouring property/one nearby.

Figure 26: Experiences of poor housing conditions in Haringey (Multiple choice) (N=956)

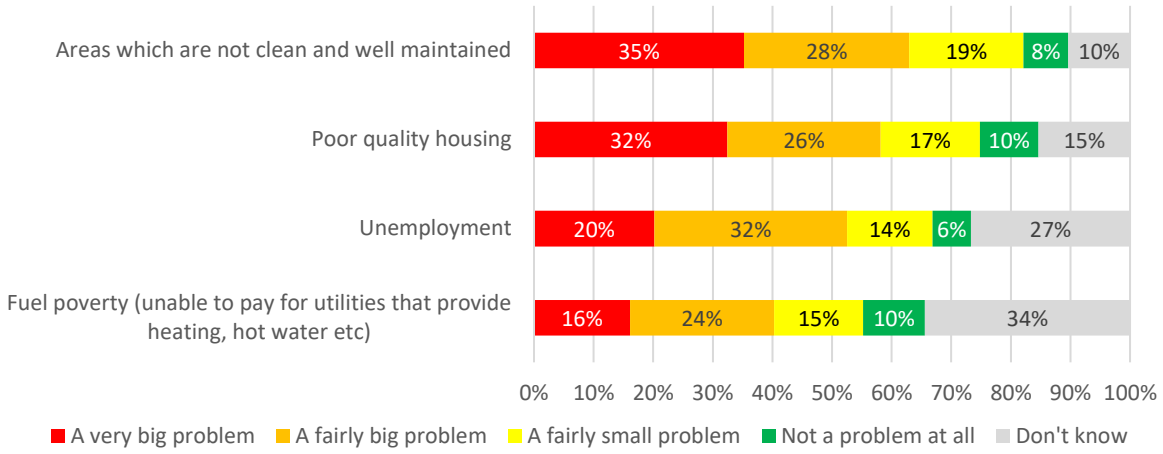


Deprivation in Haringey

Deprivation is one of the criteria that the Council has used for selective licensing. The Government's Indices of Multiple Deprivation (IMD) shows that Haringey is the 4th most deprived borough in London, and 49th most deprived in England (of 317), with the concentration in the east of the borough, where the majority of the proposed scheme is focused.

Respondents were given a list of issues associated with deprivation, and asked to state the extent to which they felt they were a problem in Haringey. Over eight in ten (82%) of respondents felt that there are problems with areas not being clean and well maintained in Haringey, followed by three quarters (75%) who felt poor quality housing is a problem. Just over half (55%) felt that fuel poverty is a problem in Haringey. Between 10-34% of respondents did not feel/did not know that these were problems in Haringey, with the highest proportion being around fuel poverty.

Figure 27: To what extent are these problems in Haringey (Deprivation)? (N=956)

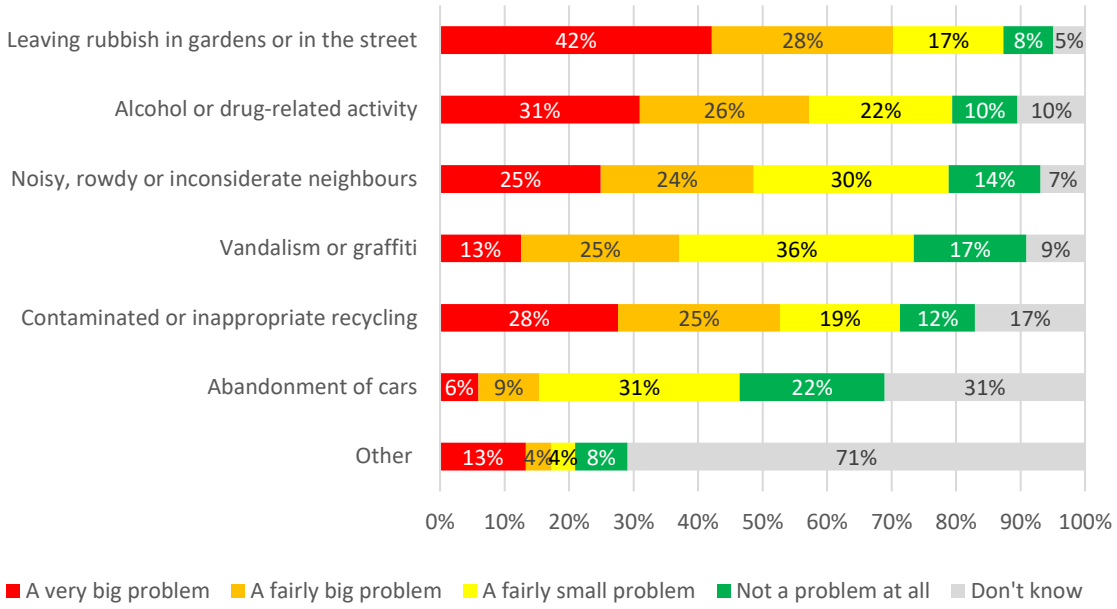


Antisocial behaviour in Haringey

Antisocial behaviour (ASB) is the final criteria that the Council has used for selective licensing. Respondents were given a list of issues associated with ASB, and asked to state the extent to which they felt they were a problem in Haringey.

The most significant problem felt by respondents was leaving rubbish in gardens/on the street (87% felt it was a problem), followed by alcohol or drug-related activity or noisy, rowdy or inconsiderate neighbours (both 79%). Abandonment of cars was felt to be the least problematic issue, with just under half (46%) responding.

Figure 28: To what extent are these problems in Haringey (ASB)? (N=956)



Respondents were then asked to state which wards in Haringey they felt these issues were a concern (multiple choice). The most popular response was the 'whole borough' (39%) followed by a fifth who said Seven Sisters (20%), followed by Harringay (17%), Tottenham Hale, West Green and Tottenham Green (all 15%). The top 4 wards are the same as those given for the previous question around property conditions. 14% of respondents did not feel these issues were applicable in any of the wards. Muswell Hill (3%), Crouch End (3%), Highgate, Alexandra and Fortis Green (all 2%) were at the bottom, with very few stating these have problems.

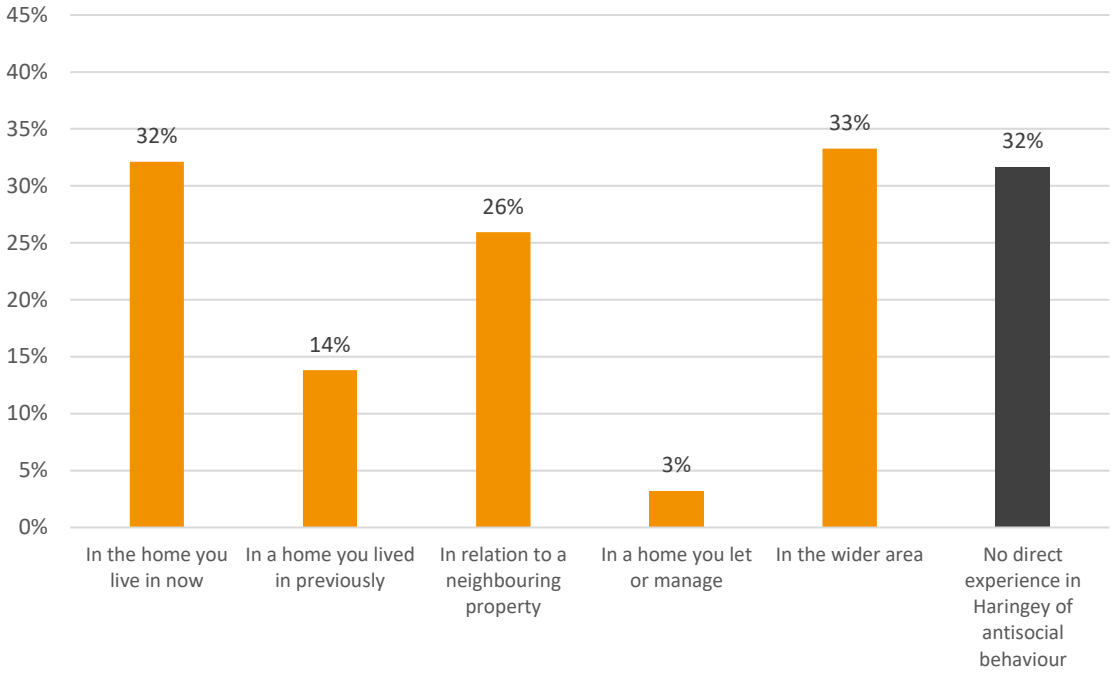
The 14 wards that the proposed scheme would cover were again ranked as the top 14 wards, although the proportions who felt there were issues in some wards were very low. These included Noel Park (8%), Hornsey (7%), Woodside (6%), Bounds Green and Stroud Green (5%).

Table 7: Where in Haringey are these issues a concern (ASB)? (Multiple choice) (N=956)

Ward	%	Within proposed scheme?
Whole borough	39%	-
Seven Sisters	20%	Y
Harringay	17%	Y
Tottenham Hale	15%	Y
West Green	15%	Y
Tottenham Green	15%	Y
White Hart Lane	13%	Y
St Ann's	13%	Y
Bruce Grove	12%	Y
Northumberland Park	11%	Y
Noel Park	8%	Y
Hornsey	7%	Y
Woodside	6%	Y
Bounds Green	5%	Y
Stroud Green	5%	Y
Muswell Hill	3%	N
Crouch End	3%	N
Highgate	2%	N
Alexandra	2%	N
Fortis Green	2%	N
Not applicable	**14%**	-

Respondents were then asked whether they had directly experienced ASB issues in Haringey in the past 5 years. A third (33%) of respondents said they had experienced them in the wider area, whilst 32% said it was in the home they live in now. Around a third of respondents (32%) said they had no direct experience of ASB in Haringey.

Figure 29: Experiences of ASB in Haringey (Multiple choice) (N=956)



Appendices

Appendix 1: Map of proposed licensing scheme

Appendix 2: Survey questions

Appendix 3: Demographic profile of respondents

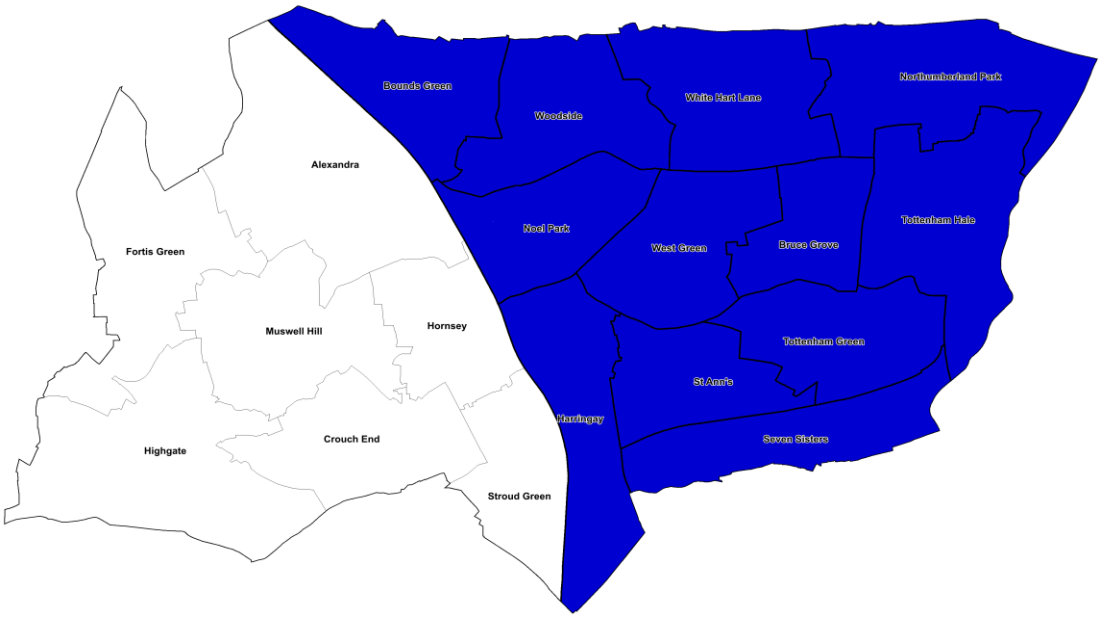
Appendix 4: Stakeholder organisations interviewed

Appendix 5: Written responses to consultation (separate document)

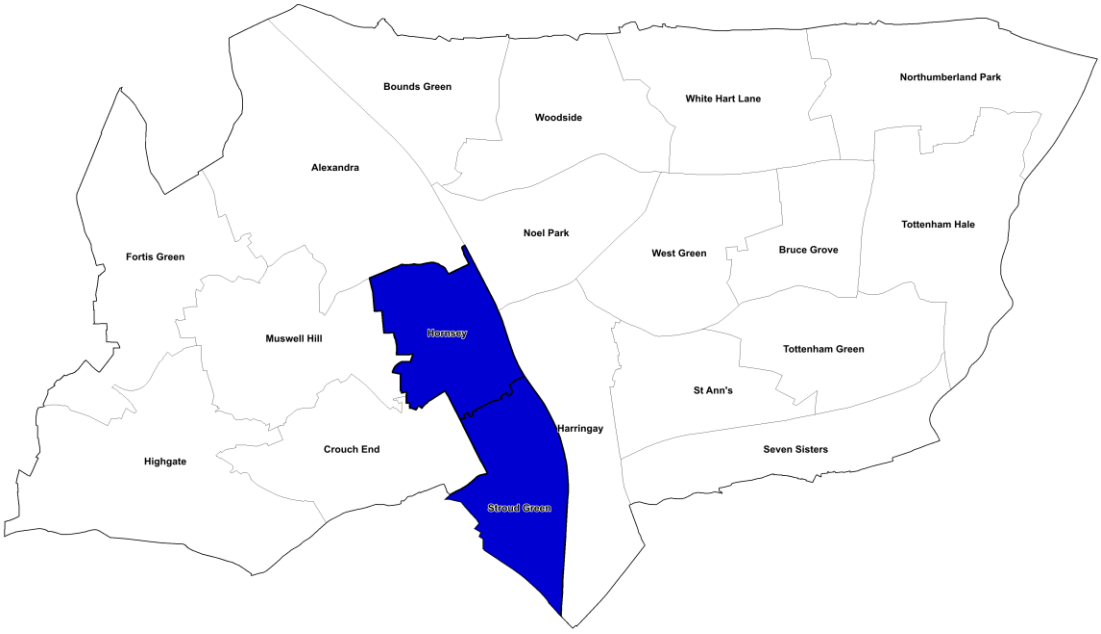
Appendix 6: Example advertising materials

Appendix 1: Maps of proposed licensing scheme

Designation 1



Designation 2



Appendix 2: Survey questions

Consultation on licensing private rented property in Haringey

Haringey Council is currently considering the introduction of a property licensing scheme within parts of the borough with known issues around poor property conditions, anti-social behaviour and deprivation.

- Bounds Green
- Bruce Grove
- Harringay
- Hornsey
- Noel Park
- Northumberland Park
- Seven Sisters
- St Anns
- Stroud Green
- Tottenham Hale
- Tottenham Green
- West Green
- White Hart Lane
- Woodside

Before making a decision, the Council wants to hear your views about the proposal and any alternatives we could consider. The Council would specifically like to hear from private tenants, landlords, letting and managing agents, residents and businesses or organisations operating in Haringey and surrounding areas.

You can see full details, including supporting documents, at **www.haringey.gov.uk/propertylicensingconsultation**

If you have any questions, then please email haringeyprs@melresearch.co.uk or call freephone 0800 0730 348

This should take no more than 10 minutes.

The closing date for the consultation is 5th September 2021.

The consultation is being run by M·E·L Research, an independent research company. Information you provide will only be used for research purposes and you will not be personally identifiable in any reports, however organisations may be identifiable. M·E·L Research work to the Market Research Society code of conduct.

We will hold all information securely and strictly in line with the Data Protection Act 2018 and the General Data Protection Regulations (GDPR). Please visit the following to read our privacy notices: **www.melresearch.co.uk/page/privacypolicy**

Section 1: Licensing private rented property in Haringey

Which of the following best describes you? ***Please select all that apply***

- ❍ Resident
- ❍ Private landlord
- ❍ Letting agent
- ❍ Managing agent
- ❍ Private tenant
- ❍ Work in Haringey
- ❍ Business in Haringey
- ❍ Other (please specify) _____
- ❍ No connection

What is your full postcode? *This information will not be used to identify you. The information will only be used to help the Council to understand if there are differing views from respondents in different areas.*

Section 2: Housing conditions in Haringey

Haringey is committed to providing good quality, safe housing for all its residents. One of the principal aims of the selective licensing proposal is to improve property conditions for those living in the private rented sector. Approximately 27 % of Haringey's privately rented homes are likely to have disrepair that is serious enough to cause harm to those tenants who live there. Failure to effectively manage private sector housing can adversely affect the health, safety and wellbeing of tenants and can have a wider impact on the local community.

For further information on the condition of property in the Private Rented Sector in Haringey read their evidence base that has been produced to support this consultation. View Selective Property Licensing Evidence Report at:
https://www.haringey.gov.uk/sites/haringeygovuk/files/evidence_report_for_consultation_final.pdf

Selective licensing can be used to tackle issues of poor property condition when it is identified that,

- a significant number of properties in the private rented sector are in poor condition, and
- are adversely affecting the character of the area, and/ or
- the health and safety of their occupants.

If an area is experiencing the above, as part of a wider strategy to tackle housing conditions, the local housing authority may consider it appropriate to make a selective licensing scheme so that it can prioritise enforcement action, whilst ensuring through licence conditions that the properties are properly managed to prevent further deterioration.

S2Q1. To what extent do you consider any of the following to be a problem in Haringey?

Please tick one box for each row

	A very big problem	A fairly big problem	A fairly small problem	Not a problem at all	Don't know
Poor state of repair of private rented properties					
Unsafe private rented properties					
Overcrowding in private rented properties					
Inadequate fire safety in private rented properties					
Poor response from landlords to tenants' complaints					
Poor management of the property					
Poorly maintained outside spaces in private rented properties (e.g. overgrown garden)					
Other (Please specify below)					

If other: What is are the other issues causing problems?

S2Q2. Where in Haringey do you think these issues are a concern? **Select all that apply**

❍ Whole borough
❑ Alexandra
❑ Bounds Green
❑ Bruce Grove
❑ Crouch End
❑ Fortis Green
❑ Harringay
❑ Highgate
❑ Hornsey
❑ Muswell Hill
❑ Noel Park
❑ Northumberland Park
❑ St Ann's
❑ Seven Sisters
❑ Stroud Green
❑ Tottenham Green
❑ Tottenham Hale
❑ West Green
❑ White Hart Lane
❑ Woodside
❍ Not applicable

S2Q3. In the past five years, how have you experienced these sorts of issues in Haringey? **Select all that apply**

❑ In the home you live in
❑ In a home you lived in previously

❑ Living in a neighbouring property or property near by
❍ Not applicable

Section 3: Deprivation in Haringey

Deprivation is the result of a lack of income and other resources, which together can be seen as living in poverty and it can be measured and evidenced in various ways. The Government's way of measuring deprivation is to use a range of measures that include the categories below:

Income, Employment, Education, Health, Crime, Housing and Living environment

The Government's measure of deprivation shows that Haringey is a borough with high deprivation levels. It is the 4th most deprived borough in London, and 49th most deprived in England (of 317). The Council believes that those experiencing deprivation are likely to have or suffer from a range of other inequalities and due to this will fall into societies vulnerable categories or those in need. Accessing services for these residents is difficult and can lead to many fearing the consequences.

Using deprivation as a criterion within Haringey's selective licensing proposals allows the Council to focus resources in areas where they will have greatest need and the IMD indicator has therefore been used to identify this.

For further information on deprivation in Haringey read the evidence base that has been produced to support this consultation. View Selective Property Licensing Evidence Report at:
https://www.haringey.gov.uk/sites/haringeygovuk/files/evidence_report_for_consultation_final.pdf

S3Q1. To what extent do you consider any of the following to be a problem in Haringey?

Please tick one box for each row

	A very big problem	A fairly big problem	A fairly small problem	Not a problem at all	Don't know
Fuel poverty (unable to pay for utilities that provide heating, hot water etc)					
Unemployment					
Poor quality housing					
Areas which are not clean and well maintained					

Section 4: Antisocial behaviour in Haringey

Haringey's vision is to be 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. The Council wants tenants to feel safe, but also neighbourhoods to not be affected by tenant

behaviour whether that be noise, rowdy behaviour, drug related offences or litter and waste issues.

The table below indicates the number of privately rented dwelling and the number of ASB incidents associated with privately rented dwelling within that ward.

Ward	No. PRS.pr	Incidents of ASB
Tottenham Green	2849	910
Bruce Grove	3068	865
Harringay	2870	858
Seven Sisters	2486	799
Woodside	2797	781
Noel Park	2059	766
St Ann's	2774	722
Hornsey	2007	642
Tottenham Hale	2566	639
Crouch End	2315	625
Bounds Green	2544	579
West Green	2022	510
Alexandra	1238	498
Muswell Hill	1243	445
Highgate	1850	437
Stroud Green	2000	393
Fortis Green	1649	363
White Hart Lane	1236	355
Northumberland Park	2287	266
Grand Total	43,775	11,711

The data analysis identifies significant and persistent levels of PRS related ASB, which the Council believes is an indication that landlords are failing to take action to combat the problem.

Designating a scheme will provide only one of a few measures that will be taken in partnership with other professionals to lead to a reduction in ASB and repeat offending.

For further information on Anti-Social Behaviour in Haringey read the evidence base that has been produced to support this consultation. View Selective Property Licensing Evidence Report at:
https://www.haringey.gov.uk/sites/haringeygovuk/files/evidence_report_for_consultation_final.pdf

S4Q1. To what extent do you consider any of the following to be a problem in Haringey?

Please tick one box for each row

	A very big problem	A fairly big problem	A fairly small problem	Not a problem at all	Don't know
Noisy, rowdy or inconsiderate neighbours					
Vandalism or graffiti					
Alcohol or drug-related activity					
Leaving rubbish in gardens or in the street					
Contaminated or inappropriate recycling					
Abandonment of cars					
Other (Please specify below)					

S4Q1 [IF OTHER] What is are the other issues causing problems?

S4Q2. Where in Haringey do you think these issues are a concern? **Select all that apply**

❍ Whole borough
❑ Alexandra
❑ Bounds Green
❑ Bruce Grove
❑ Crouch End
❑ Fortis Green
❑ Harringay
❑ Highgate
❑ Hornsey
❑ Muswell Hill
❑ Noel Park
❑ Northumberland Park
❑ St Ann's
❑ Seven Sisters
❑ Stroud Green
❑ Tottenham Green
❑ Tottenham Hale
❑ West Green
❑ White Hart Lane
❑ Woodside
❍ Not applicable

S4Q3. In the last 5 years, have you had direct experience in Haringey of antisocial behaviour...? **Select all that apply**

❑ In the home you live in now
❑ In a home you lived in previously
❑ In relation to a neighbouring property
❑ In a home you let or manage
❑ In the wider area
❑ No direct experience in Haringey of antisocial behaviour

Section 5: The proposed area for the Selective Licensing scheme

The Council is proposing to designate the following 14 wards:

- Bounds Green
- Bruce Grove
- Harringay
- Hornsey
- Noel Park
- Northumberland Park
- Seven Sisters
- St Anns
- Stroud Green
- Tottenham Hale
- Tottenham Green
- West Green
- White Hart Lane
- Woodside

S5Q1. To what extent do you agree or disagree with the proposal to designate the specified wards for Selective Licensing? **Please select one only**

❍ Strongly agree
❍ Agree
❍ Disagree
❍ Strongly disagree
❍ Don't know

Please tell us the reason for your answer.

Section 6: Impact and Problems

S6Q1. What impact, if any, do you think the proposed scheme would have on:

Please tick one box for each row

	A positive impact	No impact	A negative impact	Don't know
The proposed areas				
Other nearby areas				
You and/or your business/organisation				

S6Q2. Thinking about the proposed areas for the licensing scheme, how much of a problem do you think each of the following issues are: **Please tick one box for each row**

	Major problem	Minor problem	Not a problem	Don't know
Anti-social behaviour				
Deprivation				
Poor quality housing				

Section 7: Proposed licence fees

Licensing legislation allows Local Authorities to set and charge an appropriate fee to Licence applicants. The fee must be reasonable and reflective of the scheme in operation. Following recent case law, the fee is now required to be paid in two parts. Part A, which covers the processing of the application and the remainder, Part B, which can support the associated costs of compliance with the Licencing Conditions. All Selective licence fee income is ring fenced for the administrative and operational cost of operating the licensing scheme.

Under the proposed scheme (subject to specified exemptions), all landlords would be required to obtain a licence for each of their properties. The Council would charge a fee for a 5-year licence for each property. Fees must be reasonable and must only contribute to the costs of the scheme. The Council cannot make a profit from the fees or use the fees to subsidise other services.

Based on current costs, the proposed fees for a 5-year license are:

> Early bird Selective Licensing fee of £250 which would be for those applying before the designation comes into force.

> Full Selective Licensing fee for those applying after the designation comes into force would be £600 per property.

There would be a further £50 discount for those with landlord accreditation.

The Council considers the proposed fees to be reasonable and not excessive. The proposed fees are based on an estimate of the actual cost of the scheme, divided by the number of properties estimated to be licensed. Experience from operating previous schemes has been used for the fee setting process. The fees will be subject to review in accordance with the Council's usual fee setting process.

Further details of the fee structure can be found in the proposed fee structure document or View Selective Property Licensing Proposed Fee Structure at:
https://www.haringey.gov.uk/sites/haringeygovuk/files/selective_property_licensing_proposed_fee_structure_0.pdf

S7Q1. To what extent do you agree or disagree with the proposed fee for Selective Licensing?
Please select one only

❍ Strongly agree
❍ Agree
❍ Disagree
❍ Strongly disagree
❍ Don't know

If you have any comments about the fees, please provide these below.

S7Q2. Do you think the proposed discounts to the licence fees are reasonable or unreasonable?
Please select one only

❍ Reasonable
❍ Unreasonable
❍ Don't know

S7Q3. Are there any discounts that should be removed?

S7Q4. Are there additional discounts that could be considered?

Section 8: Proposed licence conditions

Selective Licensing conditions can be used for regulating the management, use or occupation of the house concerned. Except so far as they directly relate to a failure to manage the property, matters relating to disrepair cannot be addressed through licence conditions and will continue to be addressed, by the Council, using existing enforcement powers.

The licence will include conditions aimed at ensuring licensed properties are safe and well managed. A copy of the proposed conditions can be found at:
https://www.haringey.gov.uk/sites/haringeygovuk/files/proposed_selective_licence_conditions.pdf

S8Q1. To what extent do you agree or disagree with the draft licence conditions to regulate the following? **Please tick one box for each row**

	Strongly agree	Agree	Disagree	Strongly disagree	Don't know
Improve the quality of the neighbourhood to support a safe, inclusive and cohesive community					
Improve property safety and standards					
Improve management standards in the private rented sector					

Do you have any specific comments about the proposed draft conditions, or any suggestions for alternative or additional conditions?

Section 9: Other Comments or Suggestions

S9Q1. Do you have any further comments about the Selective Licensing proposals? Please include any suggestions for alternative ways of dealing with problems in the area or any ideas for improving the proposed scheme.

S9Q2. Would you be interested in attending one of our online forum events?
Please check this box and make sure you have left your email address at the end of this section

❍ Yes I would be interested – provide email address below:
❍ No

S9Q3. If the Council decides to go ahead with Selective Licensing in the proposed areas would you like them to contact you with details of the scheme?

Please check this box and make sure you have left your email address at the end of this section

❍ Yes I would be interested – provide email address below:
❍ No

Please provide your email address.

Section 10: About you

Thank you for providing your feedback on this consultation.

Finally, it would be really helpful to find out a bit more about you. This is to understand the views of different groups of people living in and around the borough.

What is your gender? **Please select one only**

❍ Male
❍ Female
❍ I describe myself another way
❍ Prefer not to say

What is your ethnic background? **Please select one only**

❍ White: British
❍ White: Irish
❍ White Other: Gypsy/Roma
❍ White Other: Greek/Greek Cypriot
❍ White Other: Turkish
❍ White Other: Kurdish
❍ White Other: Irish Traveller
❍ White Other: (please specify)
❍ Mixed: White and Black Caribbean
❍ Mixed: White and Black African
❍ Mixed: White and Asian
❍ Mixed Other (please specify) _____
❍ Asian: Indian
❍ Asian: Pakistani
❍ Asian: Bangladeshi
❍ Asian: East African Asian
❍ Asian Other (please specify)
_____
❍ Black: African
❍ Black: Caribbean
❍ Black Other (please specify)
_____
❍ Chinese or other ethnic group: Chinese
❍ Any other ethnic background (please specify)
_____
❍ Prefer not to say

How old are you? **Please select one only**

❍ Under 20
❍ 21-24
❍ 25-29
❍ 30-44
❍ 45-59
❍ 60-64
❍ 65-74
❍ 75-84
❍ 85-89
❍ 90 and over
❍ Prefer not to say

Disability:
Under the Equality Act 2010, 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-today activities. Haringey Council accepts the social model of disability. However, in order to be able to identify and respond to your specific needs, it is important to know what kind of disability you have.

Do you consider yourself as a person who has a disability? **Please select one only**

❍ Yes
❍ No
❍ Prefer not to say

[IF YES] Is your disability related to any of the following...? **Please select all that apply**

❑ Blindness or partial loss of sight
❑ Deafness or partial loss of hearing
❑ Developmental disorder
❑ Learning disability
❑ Long term illness or condition
❑ Mental ill health
❑ Physical disability
❑ Other disability (please write in below if you wish)

_____

This is the end of the survey. Thank you for your time. Please send this back in the Freepost envelope enclosed.

If you would like more information about who we are and how we use the information provided please see our privacy policy at: **https://melresearch.co.uk/page/privacypolicy**. This includes information on your privacy rights, including the right to withdraw your consent at any time.

If you would like more formation about Haringey Council privacy statement. This is located at: **https://www.haringey.gov.uk/contact/privacy-statement**.

Appendix 3: Demographic profile of respondents

By gender

	Number of respondents	Percentage of total	Haringey benchmark comparison*
Male	354	37.03%	49.5%
Female	431	45.08%	50.5%
I describe myself another way	24	2.51%	
Prefer not to say	147	15.38%	
Total	**956**	**100%**	**100%**

* Source: 2011 Census

By age band

	Number of respondents	Percentage of total	Haringey benchmark comparison*
Under 20	1	0.10%	24.9%
21-24	17	1.78%	7.4%
25-29	91	9.52%	11%
30-44	310	32.43%	28%
45-59	253	26.46%	16.4%
60-64	38	3.97%	3.6%
65-74	71	7.43%	4.9%
75-84	18	1.88%	2.9%
85-89	1	0.10%	0.6%
90 and over	2	0.21%	0.3%
Prefer not to say	154	16.11%	
Total	**956**	**100%**	**100%**

* Source: 2011 Census

By disability

	Number of respondents	Percentage of total
Yes	108	11.30%
No	677	70.82%
Prefer not to say	171	17.89%
Total	**956**	**100%**

By ethnic group

	Number of respondents	Percentage of total	Haringey benchmark comparison*
White: British	414	43.31%	34.7%
White: Irish	29	3.03%	2.7%
White Other: Gypsy/Roma	2	0.21%	0.1%
White Other: Greek/Greek Cypriot	19	1.99%	
White Other: Turkish	14	1.46%	
White Other: Kurdish	5	0.52%	
White Other: Irish Traveller	1	0.10%	
White Other: (please specify)	137	14.33%	23%
Mixed: White and Black Caribbean	9	0.94%	1.9%
Mixed: White and Black African	4	0.42%	1.0%
Mixed: White and Asian	13	1.36%	1.5%
Mixed Other (please specify)	13	1.36%	2.1%
Asian: Indian	16	1.67%	2.3%
Asian: Pakistani	0	0.00%	0.8%
Asian: Bangladeshi	4	0.42%	1.7%
Asian: East African Asian	0	0.00%	
Asian Other (please specify)	5	0.52%	3.2%
Black: African	26	2.72%	9.0%
Black: Caribbean	21	2.20%	7.1%
Black Other (please specify)	7	0.73%	2.6%
Chinese or other ethnic group: Chinese	8	0.84%	1.5%
Any other ethnic background (please specify)	19	1.99%	4.8%
Prefer not to say	190	19.87%	
Total	**956**	**100%**	**100%**

* Source: 2011 Census

By respondent type

Respondents could tick more than one option.

	Number of respondents	Percentage of total
Resident	489	51%
Private landlord	195	20%
Letting agent	11	1%
Managing agent	15	2%

Private tenant	381	40%
Work in Haringey	78	8%
Business in Haringey	26	3%
Other (please specify)	34	4%
No connection	5	1%
Total	**956**	**100**

By postcode sector

	Number of respondents	Percentage of total
Within Haringey	900	94.1%
Outside of Haringey	50	5.2%
Unidentifiable/blank	6	0.6%
Total	**956**	**100**

NB. Results have been analysed by the outward code. Respondents with postcode areas that cover parts of Haringey have been categorised as 'within Haringey'.

Appendix 4: Stakeholder organisations interviewed

We spoke to 7 stakeholders representing the following range of organisations and interests in Haringey:

NRLA (landlord agency)

Citizens Advice Haringey (tenant advice)

Cambridge House – Safer Renting (tenant support)

Haringey Council teams including:

- ASB and Enforcement (Environment & Neighbourhoods)
- Waste and ASB
- Public Health

Councillor (with portfolio for housing)

Appendix 5: Written responses to consultation (separate document)

Appendix 6: Communication visuals

Advert in Enfield Independent



Advert in Haringey People Magazine



A4 poster displayed within Council Customer Services centres



A5 leaflet distributed to Council customer services centres, libraries, resource hubs and local businesses



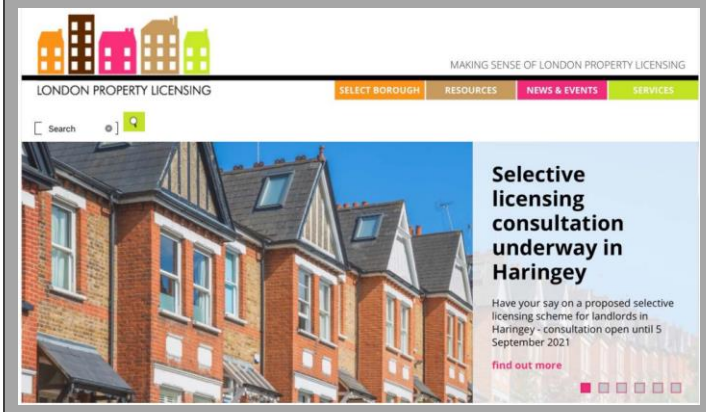
Digital advert across various websites and platforms



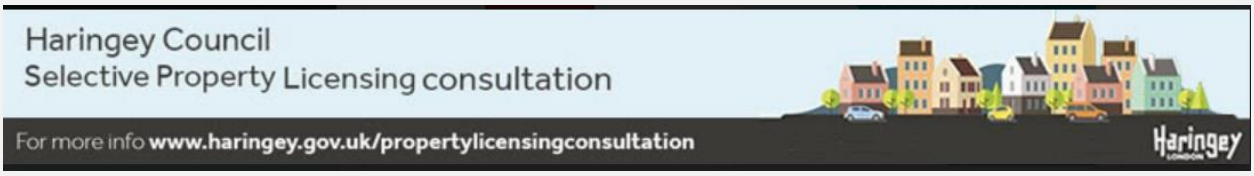
Advert promoting the consultation extension on Twitter



Landing page advert on the London Property Licensing website



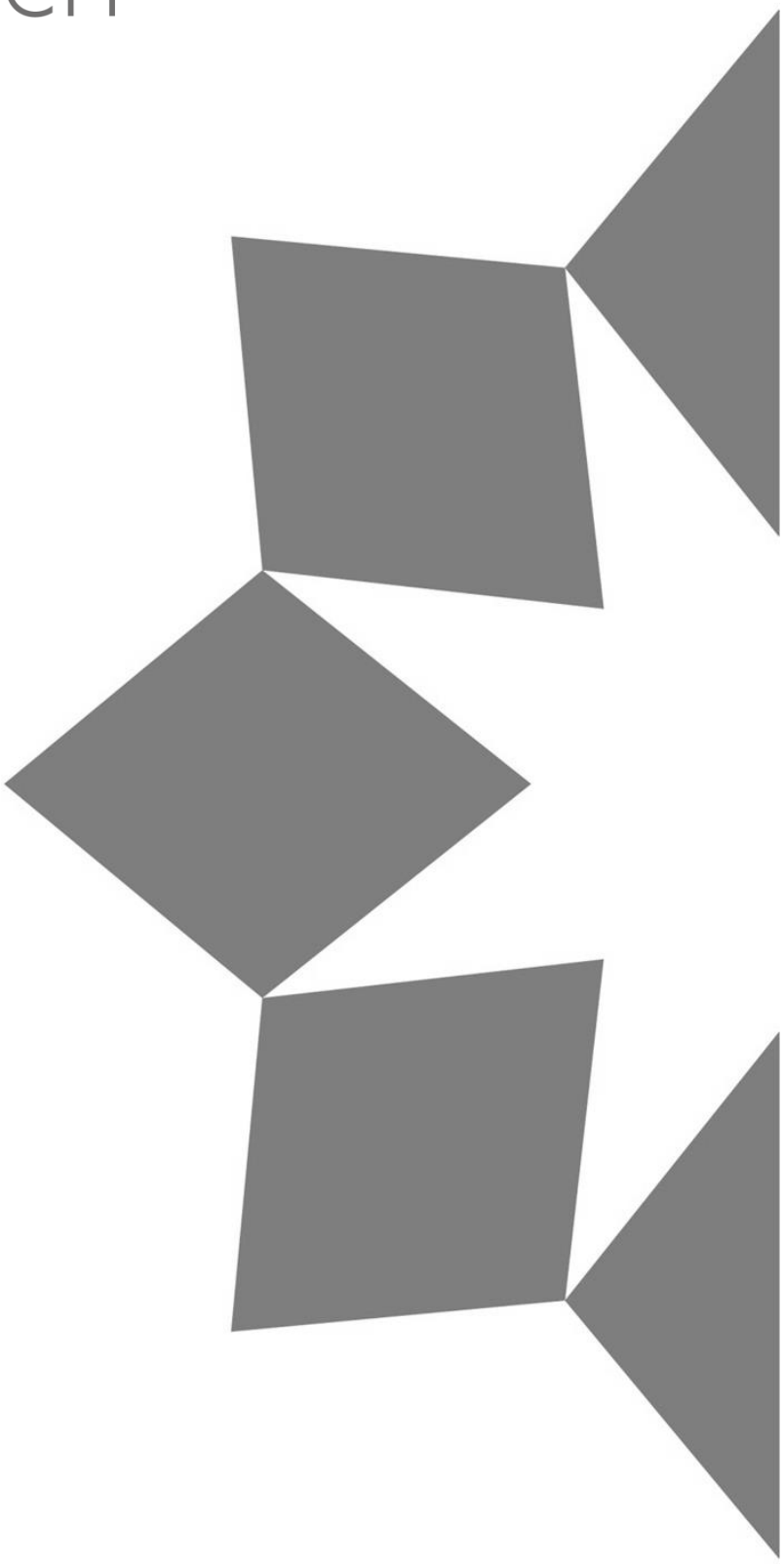
Digital banner advert displayed across various websites and platforms



Workshop advert on Facebook



m·e·l research



Appendix 5: Written responses to consultation (verbatim)

London borough responses

Response 1 (21/07/21)

Dear Stephen,

Re: Private Rented Property Licensing Schemes – London Borough of Enfield Consultation Response

Thank you for providing the opportunity to comment on your consultation to introduce a selective licensing schemes in the London Borough of Haringey.

Enfield Council supports the introduction of your proposed Selective Licensing scheme. We consider the proposed scheme will improve the conditions of private rented properties for your residents by resolving issues such as poor property conditions, poor property management and anti-social behaviour in areas of high deprivation.

Having reviewed the evidence, it clearly shows the need for licensing to improve standards in the private rented sector in Haringey. The evidence demonstrates that licensing has provided additional enforcement powers will help tackle these issues by requiring all landlords to sign up to licence conditions that help ensure they adopt a responsible approach to management of their properties and identify those landlords whose management arrangements are inadequate. We are of the view this could not be achieved by using existing powers alone. We consider the new proposals will continue to make improvements in Haringey's private rented sector by identifying those private rented properties that are managed ineffectively.

It is clear that if the proposed schemes were not adopted that this may limit the authority's ability to tackle compliance issues in a growing private rented sector.

Enfield believes that the private rented sector has an important role to play in the housing market. We consider licensing benefits both tenants and landlords. It can have a positive effect for landlords; from area improvements that potentially have a positive impact on property values and tenancy turnover. Tenants benefit from improved living conditions and better managed properties.

We consider that property standards and safety would be improved in Haringey's implementation of the proposed selective licensing scheme and will complement the additional licensing scheme that has already been introduced.

Yours sincerely,



Cllr Nesil Caliskan
Leader of the Council

Response 2 (03/08/21)

Dear Stephen,

Thank you for inviting me to respond to your consultation in relation to proposals to introduce two selective licensing designations to cover 14 of Haringey's 19 wards. Please accept my apologies for the delay in getting back to you.

The London Borough of Havering, having recently made a selective licensing designation itself, is fully supportive of such a scheme to improve the management and standards in private rented sector homes and to reduce anti-social behaviour.

The current housing market is buoyant with increasing property prices and growing demand for homes to rent in the private sector, particularly across London, which can result in a ready supply of tenants who are willing to rent even the worst condition homes. Property licensing promotes better regulation of this sector and places greater responsibility upon landlords to not only manage the properties they let out better, but to also intervene as necessary to reduce anti-social behaviour caused by tenants.

Another great benefit of property licensing is to enable local authorities to carry out pro-active property inspections. This allows disrepair and hazards to be identified and addressed without the necessity for tenants to first make a complaint. Tenants who are living in the worst condition housing are often the most vulnerable and are also less likely to complain about poor living conditions for fear of retaliation or eviction by their landlord. Proactive property inspections will safeguard tenants from this form of retaliation

Most London authorities operate some form of property licensing scheme, which can only serve to improve the sector by driving out the rogue landlord element and encourage greater professionalism among landlords.

The Council is happy for you to include this letter of support with your application to MHCLG.

Kindest regards,

Damian

Councillor Damian White

Leader of Havering Council

Ward Councillor for Squirrels Heath

Response 3 (06/08/21)

Dear Mr McDonnell,

Haringey Selective Licensing Consultation 2021

Thank you for your letter of the 25th June 2021 seeking Newham's views on Haringey's private rented sector (PRS) discretionary licensing consultation, and I am responding on behalf of Mayor as lead cabinet member for Housing.

As well completing your online survey and informing our 25,000 private landlords concerning your proposals The Mayor of Newham would like to extend her support to your initiative to introduce selective licensing across most of the wards in your borough.

Here in Newham we will soon also be considering a further " 3rd generation" application to Government for our own selective licensing scheme. Over the last 8 years we have found the framework of discretionary licensing across the PRS the most effective way to protect vulnerable PRS tenants as well as holding private landlords to account when needed. I am sure if you are able to secure the Secretary of State's consent Haringey tenants will also benefit from those protections provided by licensing rented homes. This will be of the utmost importance to all of us if we are to begin to address the devastating negative effects of this pandemic on our most vulnerable communities.

Yours sincerely

Cllr Shaban Mohammed

Lead Member for Housing Services

Canning Town North Ward.

Margaret Zincraft on Behalf of Councillor Mohammed

Cabinet Support Officer

Mayor's Office

London Borough of Newham

Landlord/Letting Agent/Managing Agent responses

Response 4 (25/08/21)

Dear Sirs

We accidentally picked up a letter send to License Holder, xxx. An absolute miracle that were received this with the all the mistakes in the address and post code.

We currently hold licences in Haringey so should be on their database. In fact I am in regular email contact with Haringey Licensing team and have not been contacted by them in this regard.

I have in the past taken part in major consultations with London Councils. I find them a waste of time and money. While the council have a DUTY to consult, they do not have an obligation to implement the findings.

However I want to make my feelings clear.

Landlords have a duty to ensure that all properties they rent are safe and well maintained. Councils already have the authority to tackle low standard accommodation and take action against offenders. Clearly they are failing in their duty. Since the first lockdown officers have not been visiting properties where licensing applications have been made. Covid is the excuse given.

My concerns are that responsible landlords are being penalised financially in what is a hard time for landlords and forced to incur the cost of a license without any benefit whatsoever. If guidelines were more readily available to landlords then they would of course take note. A lot of of the issues relation to lack of maintenance is lack of enforcement action. From my many years of experiences in property management, the quality of properties on offer are of a good standard. Landlords who rent out sub standard properties are rate, in fact council managed properties are far more neglecting than those in the private rental sector.

I have no doubt that regardless of the result of the consolation selective licensing in the five wards mentioned in the letter is inevitable.

Kind Regards,

xxx

Response 5 (26/08/21)

Hi

I have recently had to apply for a selective license for my property in Enfield as their scheme starts in September and I have now received a letter from Haringey asking for my feedback on the new Selective Licensing scheme you are looking to release in the borough for Privately Rented properties, so I immediately visited your website to issue my feedback (www.haringey.gov.uk/propertylicensingconsultation).

My first concern is that the feedback you are requesting from me, is based on a pre-configured questionnaire which will direct me down a certain route.

Many of the questions I cannot answer with any sincere response based on my personal knowledge.

I can of course read the reports you have provided on the page and answer based on the information you have fed me, but that wouldn't be honest or fair feedback.

I know the Haringey borough well and have lived there and worked there in the past, much of what I have experienced is not as a result of the Private Rented sector, but a lack of investment & neglect from the local council and government over the decades.
Moving in poverty stricken families into the area then forcing them into the private rented sector instead of providing them with the social housing they need and deserve to give them stability of knowing they have a permanent home.

The private rented sector is just that, it's an individuals right to purchase additional properties with their hard-earned money and rent them out as business venture to earn an income from and generate some capital from as a long-term investment.

- Why does the government now see landlords as targets to generate income from?

- Why does the government believe that they can tell landlords how much rent they can charge or how long they must rent for?
- Why does the government eviction process victimise landlords, even if they are not at fault?
- They don't with any other business, so is this fair?

I can understand a need to know which properties are privately rented in your borough, as this would be very useful information to have.

I can understand that you would like to eliminate certain behaviours by bettering the condition of properties, but this should apply to all tenanted properties NOT JUST PRIVATELY RENTED...

I can understand that this is an easy way to claim £600/property from each of your private landlords.

I recently had to apply for an HMO license for my property, which for the last 3 years, I haven't needed it as I have family living in my property, but I wasn't offered a refund for not needing it. I have not renewed the HMO license, but will now apparently require a selective license.

Selective licensing is just a new way to claw in some extra money from for the rest of the rented properties in your borough.

- I don't understand what you will be doing for the money, apart from updating a database.
    - Will you be sending out inspectors to <u>regularly</u> check the registered properties?
- I don't understand how you will monitor who has applied and who hasn't, how will you enforce it?
    - Will you be scouring the property portals or speaking with local agents to provide you updated lists of properties that should be applying for licenses?
- I don't understand how this positively impact rented properties or remedy anti-social behaviour in the area.
    - Yes you will know whether they have smoke alarms
    - Yes you will know approximately how many tenants in each property (if the applicants don't lie).
    - Yes you will know the sizes of the rooms or whether they have a valid EPC, Gas & Electric certificate

But... how will that help?

The residents of Haringey (and all deprived boroughs nationwide) need stability, social housing, recreation for the youth, as well as simple things like food, heat & water.

With any property licensing, the government & councils always manage to word the requirements in such a way to conveniently exclude the properties owned and managed by you. ***"All properties in the area that are <u>privately</u> rented to single households (or two sharers) will need to have a licence to be legally let."***

I don't see why this should be the case.

I have seen many council owned properties in bad states of repair or requiring maintenance.

I pride myself on providing properties that people are happy to live and call a home & react swiftly at the report of a problem, yet I am tarred with the same brush as landlords who abuse the system.

I hope this feedback helps and is taken into consideration.

Many thanks

xxx

Response 6 (02/09/21)

Dear Sir/Madam

First of all I have only just received this letter from Haringey Council with regards to the new proposed licensing scheme, please see attached, it was sent to the wrong address.

I object most strongly to the this new scheme, it is just another excuse to raise funds for the council which will not benefit anyone at all except create more bureaucracy for everyone concerned. I have run very successful HMO's in the borough for the last 20 years to a very good standard, yet every license renewal costs me money for minor petty improvements and renewal fees.

Bad landlords get away with providing poor accommodation and bringing in this policy will not change that, the council should put their efforts in to dealing with them rather than penalising good landlords. Haringey along with many councils are the worst culprits in not providing good accommodation. You only have to walk round any social housing developments to see this, Grenfell is a classic example of how poorly council tenants are treated.

xxx

Response 7 (03/09/21)

Sorry I wasn't able to fill in your online form. I am a committee member of the Haringey Leaseholders Association. We represent some 4,500 Right to Buy leaseholders in Haringey about a third of whom rent out their properties. So these people are in the PRS I believe.

I am also sending in my comments as an individual. There didn't seem to be any way to send these comments other than sending them to you. I hope you will take them into consideration.

(information from attachment)

LBH's proposal does not meet the conditions for selective licensing according to the legislation and the subsequent order.

First they have to show that there is a high proportion of PRS. They use the 19% figure for PRS in England as a benchmark but the relevant figure is the London figure which is 28% according to the English Housing Survey. They say that LBH is higher than this at 34% but that figure dates from 2018 so it is not up-to-date (p10 of the state of the borough document). Since then there has been Brexit and Covid so it could be very wrong. They also say that there are 44,000 PRS dwellings in the borough but this is an estimate derived from modelling from Metastreet. But there is no link to any information about how Metastreet reached their conclusions so we have no evidence to show that this figure is correct. Some of the data they are relying on goes back to the 2011 census. This is not relevant enough.

So they have not shown evidence that they meet this first condition.

Then they have to show that the areas affected meet at least one of several other possible conditions. On p14 of their report they suggest that almost all of the borough meets three conditions: poor housing, antisocial behaviour and deprivation and that five wards are excluded because they don't meet all three. But this is not how it works. If all the wards meet even one condition properly then all are eligible. Unless a condition is properly met by a ward it is not eligible at all. Sort-of meeting three conditions is not enough.

Poor housing: In order to meet this condition LBH have to show that there is a risk of health and safety hazards. But all they do is refer to a risk-based assessment from their Health and Safety system without showing us how this works. So this is unevidenced. What the hazards actually are is not said just that they are category 1. Nor have they carried out a review as required by the Order.

Anti-social behaviour: the evidence does not show that this is correlated with PRS. It is just asserted that levels are high but there is no comparison with complaints from the social sector for instance. It is likely that these would be much worse as PRS residents are happier than social tenants. LBH say that ASB is correlated with deprivation but the graph on page 12 shows that the most deprived area Northumberland Park has the lowest level of ASB problems in PRS and that Highgate has a relatively high rate despite having no deprivation. There is no consideration of whether certain ASB problems are not down to repeat offenders.

Moreover the main ASB problem seems to be poor waste disposal / fly-tipping but that is not enough of an issue to justify such a massive and draconian scheme. There are existing powers for dealing with this as LBH plan to do for the five excluded wards in the west of the borough.

Deprivation: since 2015 deprivation has been going down in Haringey according to the state of the borough report. Life expectancy is better than English average. Haringey does very well in education much better than the London average. Youth offending is down to poor parenting or the death of a parent not poor housing and anyway on p19 LBH admit that the scheme will not help with deprivation. But they have to be able to show that it will help with that to meet the strict conditions of selective licensing.

Additionally LBH are supposed to show that other steps they are taking are going to combine to make a difference but they haven't detailed any. Nor have they aderquately explained why the existing powers they have are not enough to deal with the main problem of litter / waste disposal. Basically this is a way for them to raise revenue that will be additional to existing resources for dealing with cleaning up the borough (and additionally other things). But that is a misuse of the scheme which is supposed to be specifically and carefully targeted. In addition it is not supposed to be automatically introduced for the maximum term of 5 years. Clearly this is something LBH want to have permanently in place. If they are going to do this they should start with something very local to see if it works in the areas worst affected. Some of the wards are not very highly deprived like Stroud Green or St Ann's or West Green. It is too broad-brush.

Moreover the scheme is likely to cause hardship by forcing rents up and leading to increased homelessness at a time when the economy is already struggling. The 600 fee is high and landlords will just put it on the rent.

LBH are seeking to deflect from the problems in the socially rented sector for which they have much more direct responsibility. P10 of the state of the borough report shows that the real story is the collapse of the social housing sector and the high rates of dissatisfaction within it. Between 2015 and 2018 the number of social tenants fell from 81k to 55k while PSR only increased by 17k. PSR are significantly happier than social tenants so most of the ASB seems to be coming from the socially rented sector and not from PSR.

This proposal shows an ideological bias against landlords. The HLA has a significant proportion of landlord leasholders (about one -third) so we should send in this contribution to the consultation.

Response 8 (04/09/21)

Dear Gavin Douglas

We feel that the propsed extra licencing is unnecessary as most properties with couples or families generally look after the proeprty themselves including early reporting of any problems. As it's their home, they have a need to keep us informed. HMO have a didn't mindset as the communal parts are generally less of a concern to each indiviual tenant. With that said our properties are very well looked after by both HMO and private family tenants. Thereffore this seems like another money making scheme where prosicution of rogue landlords would not penalise us all. We want all properties in LOndon and even the UK fit for purpose and would like all tenants to live in quality accomodation but the councils need to target landlords that break the law and stop creating new costs for us. We have seen the admin fees disappear without a consulation and mortgage relief also.

Regards

xxxx

Response 9 (05/09/21)

HLA (Haringey Leaseholders Association)

LBH's proposal does not meet the conditions for selective licensing according to the legislation and the subsequent order.

First they have to show that there is a high proportion of PRS. They use the 19% figure for PRS in England as a benchmark but the relevant figure is the London figure which is 28% according to the English Housing Survey. They say that LBH is higher than this at 34% but that figure dates from 2018 so it is not up-to-date (p10 of the state of the borough document). Since then there has been Brexit and Covid so it could be very wrong. They also say that there are 44,000 PRS dwellings in the borough but this is an estimate derived from modelling from Metastreet. But there is no link to any information about how Metastreet reached their conclusions so we have no evidence to show that this figure is correct. Some of the data they are relying on goes back to the 2011 census. This is not relevant enough.

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Park has the lowest level of ASB problems in PRS and that Highgate has a relatively high rate despite having no deprivation. There is no consideration of whether certain ASB problems are not down to repeat offenders.

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LBH are seeking to deflect from the problems in the socially rented sector for which they have much more direct responsibility. P10 of the state of the borough report shows that the real story is the collapse of the social housing sector and the high rates of dissatisfaction within it. Between 2015 and 2018 the number of social tenants fell from 81k to 55k while PSR only increased by 17k. PSR are significantly happier than social tenants so most of the ASB seems to be coming from the socially rented sector and not from PSR.

This proposal shows an ideological bias against landlords. The HLA has a significant proportion of landlord leasholders (about one -third) so we should send in this contribution to the consultation.

Individual responses

Response 10 (01/07/21)

Dear Private Sector Housing Team

Reference: Selective Property Licensing Consultation

I refer to your letter dated 23rd June 2021 a copy of which is attached.

You made an incorrect assumption that I am a tenant in private rented accommodation in Haringey. I am a private tenant. I rent in the county of Herefordshire. I own property in London, and these are professionally let to tenants by my agents.

You have requested my views about selective property licensing for your consultation. In my opinion as a tenant in the private housing, the private sector works well and landlords follow good market practices set by government and many laws updated regularly, e.g., recent regulatory requirements to certify electrical installations in both private and public sector rental properties are safe. There has been an increase in fire safety following the Grenfell disaster. Councils throughout the UK must work harder to improve fire safety. As a council, you must focus on improving the Haringey Homes public sector housing stock. Therefore, as a council you must not inflict selective property licensing on a private sector market that works. This would simply be another tax for private sector landlords to pay.

Yours faithfully

Response 11 (05/07/21)

Dear Mr Malcolm,

I should like to comment upon Haringey's proposal to introduce a selective property licensing scheme. I have tried participating in the consultation exercise via the council's website. However, it turned out to be a box-ticking exercise, and the questions were irrelevant to the comments I have to make. I am, therefore, sending this email instead.

I should add that I am writing on behalf of my son who is the owner of the xx floor flat at xxxx N4. To be precise, my son owns the lease, and Haringey the freehold of the building. I have a financial interest in the flat. I am therefore, I believe, qualified to send this comment.

Anyway, my comment is as follows.

It is, of course, only right that Haringey should be taking steps to ensure that privately owned accommodation in buildings for which they own the freehold meets an acceptable standard. It's obvious, too, that landlords have a responsibility for keeping their property in good repair. However, it is a responsibility which runs two ways, for the council itself has a responsibility for ensuring that buildings they own freehold are maintained in good condition. It is my view, then, that any license should specify penalties to be incurred by the council should it fail to meet its own responsibilities. I assume these would be financial penalties.

My reason for emphasising the point is that I am only too aware of how negligent the council can be, having experienced the council's half-hearted attempts, spanning a spanning a period of ten years, to deal

with the problem of water leaking into the flat at xxx from the flat above. (Actually, I gather that the problem has now been fixed, - but for how long?)

Yours Sincerely,

xxx

Response 12 (13/07/21)

This has recently been brought to my attention. I live in Bounds Green and was very surprised to see Bounds Green among the 14 proposed areas. Where does it sit in the English Indices of Deprivation 2019?

Xxx

Response 13 (16/07/21)

…. I can't attend today's meeting as I am working. I teach so I'm not able to stop and join a meeting. I would like my view to be represented that I don't believe antisocial behaviour is such a problem in my ward- West green and I think it is social tenants who cause the most trouble. Not small flats with professional couples - who make up tenants in properties that aren't HMO.

I may be free next Wednesday depending on my timetable.

To me this seems like the council making money and taking advantage of their position.

Kind regards,

xxx

Response 14 (23/07/21)

Had a letter requesting feedback re licencing scheme.

Sounds like another level of bureaucracy and administration being implemented by the council rather than common sense use of the council's time. I am sure that there will already be legislation in place to prevent people littering and preventing anti social behaviour, both tenanted and owned properties it is not the tenants fault it is the people with low social cohesion. If the time was spent by the council creating a sense of community by fostering a sense of community rather than grabbing money from landlords through licencing or running events it would be a better place to live. What about creating more local markets or providing better street cleaning services / dealing with the homeless near the sainsburys superstore?

Licencing will only reduce the number of landlords / up their costs which ups the costs to tenants.

Response 15 (24/07/21)

Dear Lynn Sellar,

Thank you for your letter dated July 2021 inviting the Tenants of the property to participate in the Selective Property Licencing Scheme survey.

There are no private tenants at xxx at this time and it's rather concerning you have been led to believe by Haringey Council that there are.

In my honest opinion and from my experience dealing with the council over the years, I can tell you that Haringey Council as an entity is dysfunctional, unreliable, disorganised, corrupt, vindictive and just outright cruel, much like the current government.

Requiring landlords to obtain a licence from Haringey Council before renting their properties sounds like a power & money grab to me, and is in my opinion the worst idea since the inception of Low Traffic Neighbourhoods. Current legilsation and regulation already give the council too much power (and not just with regard to private property) which they, the Council frequently abuse to the detriment of residents. Giving this Council more power is frankly irresponsible and unwise, and I am firmly against this scheme (or any other scheme which gives this Council more power - see previous paragraph).

If the Council really wanted to improve anything in the borough, they could provide new & **improve existing services**, as opposed to provide **governance** and seek more **powers to control** which this scheme clearly aims to do.

In order to achieve improvement of any kind however, empathy, understanding, hard work, altruism and a move away from the Councils current **corporate disposition** would be required (growing a heart would be a good start).

You may or may not wish to include this opinion in your survey - the choice is entirely up to you - but I kindly ask that you remove this property from your list of properties housing private tenants.

Yours Sincerely,

Xxx

Response 16 (24/07/2021)

As a landlord I'm highly supportive of a licensing scheme - for all landlords, not just landlords of HMOs. It would set clear guidelines for me and tenants, and reassure my tenants about the experience they should expect.

Hope that's helpful!

All the best,

xxx

Response 17 (24/07/2021)

Dear Madams/Sirs if Haringey council,

We received on Friday 23rd July 2021 the attached letter to inform us of a consultation on a "Licensing scheme for landlords in Haringey".

We have been renting this property for the last 3 years and we would not be in favour of this Licensing Scheme in Haringey to becime effective.

Yours sincerely

xxx

Response 18 (25/07/21)

Dear Sir or Madam,

I am insufficiently informed about conditions in other parts of the Borough to complete the questionnaire. I live in privately rented accommodation in xxx, a small 1930s purpose-built block of 14 flats in the Highgate ward (postcode xxx). I am generally satisfied with the management of the block. My only real complaint is about the rent increases, which take place every two years and which invariably exceed the rate of inflation.

Yours sincerely,

xxx

Response 19 (25/07/21)

Haringey initially said they would introduce selective licencing in fortis green Northwood n6 and n10

The affluent residents objected and this did not go-ahead

they are now dividing the borough as a rich man poor man zone rather than treat all the residents fairly and unify the borough

very few people can afford to buy property in n10 n6 and n8 and ally pally n22

Ally pally is the sister borough of Bowes park, this is victimisation at its worst

avoid being subjective and either introduce selective licencing boroughwide or not at all

there are numerous sole occupancy studios with youngsters paying £100 per month council tax and yet mansions in highgate pay £ 250 PCM

this is another injustice, so the income from a studio flat with a single occupant will generate £ 1100 for licencing and £1000 for council tax only in the area that is victimised the rents will undoubtedly increase .

these studios help youngsters work from home safely and not spread the virus in shared offices and undergrounds and buses.

and all the mansions in the affluent areas with numerous studio conversions will be exempt from the £1100 licencing fee

i hope they will treat the entire borough fairly, it has also been observed ith planning, if the affluent object it does not go through. Haringey love segregating the residents rather than levelling the disparity between comprehensive and Pvt school areas.

see this is very important to take a lesson from mother nature as with the pandemic and floods and level out the disparities, Haringey workers are the best, i hope the politicians will see that consistency is required

Response 20 (from same respondent as 19) (23/08/21)

The graphs show that bounds green has low levels of ASB compared to Hornsey and crouch end

there is no evidence to state that residents live in substandard accommodation

Tenants are moving out of London as it is cheaper with WFH to live outside London and work remotely

until such time that the entire borough/ country is subject to selective licencing, I would urge the council to remove bounds green ward from the list as there is a danger that it will become a ghost wars as more and more tenants move out of London. landlords will use this as an excuse to put up the rent in what is effectively a clean well rin sister ward to Ally Pally

we have lovely restaurants like the vrisaki and Middleton road won an award for best Sunday market., hairdressers all run by dare i say immigrants the same as Muswell hill fortis green and Hornsey park lane Northwood hall n6

i have lived here since 1969 and i have not taken kindly to the fact that the council has ignored that the ASB is on par with the elite crouch end i

i will write to the minister and the mayor to either introduce selective licencing to the whole borough or employ someone to revisit the criteria by

inspecting all the properties in Haringey to check the quality of housing, and whether immigrants indulge in antisovial behaviour

it is astonishing to say bounds green has immigrants, most of the shops and landlords are Greek and as a nation, they have very high standards in respect of managing their rented properties and restaurants, dry cleaners, hairdressers et

Does this mean that if the Afghan Asylum seekers settle in Muswell hill the area will be tarnished with the same brush as bounds green.?

i cannot believe a lovely borough like Haringey is insinuating that immigrants and Asylum seekers bring housing and letting standards down, , if the stats for asbo exclude housing association tenants, bounds green would be the best ward in the borough.

please please reconsider and exclude bounds green lest we become the Bronx of Haringey !!

Response 21 (24/07/21)

Dear Eldridge,

I hope you are well.

I have just filled in the consultation. Although I don't believe we are affected as we are an owner occupier landlord. However, I am making a number of points which are summarised below:

Start:

I live on one of these wards and haven't witnessed any antisocial behaviour by residents. I can only speak for myself. A government report* in 2014 found poverty (particularly child poverty) and homelessness is driven by family breakdown so supporting marriages would make more difference than landlord licensing which will drive up the cost for everyone for the sake of weeding out a 'minority of criminal landlords'. Unfortunately, Haringey planning and building control is not very responsive. I'm still waiting for an answer to an querry I submitted a couple of months ago - in the meantime, the maintenance problem is getting worse.

I didn't see any evidence in the (landlord licensing) report that those areas that have used landlord licensing have benefitted from more satisfied and better behaved tenants. The landlord licensing scheme in Liverpool was discontinued after running for 5 years for eg: there weren't many tenant accommodation complaints. Plus the council already has powers to regulate housing safety and public disturbance (building regs, landlord electricity/gas certs etc).

With the shortage of (social) housing in the borough, the council should be finding ways of attracting more landlords / supporting them not deterring them. If you have held voluntary sessions which don't have a good take up, maybe you are not doing it right. Maybe consult the target group about what support would help them to improve.

Stop

blessings

xxxx

* Cm_8781_Child_Poverty_Evidence_Review_Print pp 26, 27, 63 (or put in search 'marriage')

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/285389/Cm_8781_Child_Poverty_Evidence_Review_Print.pdf

Response 22 (from same respondent as 21) (25/07/21)

Dear Eldridge,

I've had a look at most of the docs relating to this proposal.

As this landlord license concept is **concerned mainly with problem tenants** and the issues they cause in neighbourhoods ('management' rather than 'property maintenance'- since property maintenance/ safety is already legislated by building regs etc) and the ability of landlords to keep the problem of ASB tenants under control, I would suggest the best way to support landlords in this is to make it easy for them to evict antisocial tenants.

From what happened to us, you have an idea that no landlord wants to have problem tenants, but once this has happened, what can be done to 'evict' them. You saw how hard it was for us and this was with our dear lady who the council had sent to us and even the officers had difficulty moving her on - how on earth can landlords do any better?

A landlord license doesn't even attempt to tackle this juggernaut of a problem. My suggestion is that the council needs to use its powers to 'support' landlords to evict ASB tenants - this is a win win for neighbourhoods and a win win for landlords.

Blessings

xxx

Response 23 (25/07/21)

Dear Sir/Madam,

Thank you for your recent communication regarding the above mention scheme.

I am not a tenant and my family have owned this house since 1974. However, I would like to comment on the scheme as both xxx and xxx are privately rented HMOs.

I think your licensing scheme is a good idea for many reasons. Some of the rented properties on my house and in appalling condition, but people live there as it's cheap.

Without mentioning the specific property on xxx Avenue, earlier this year a mother of four almost lost her life and the lives of her children and the smoke alarm was faulty and a fire started on the stairs. Her children managed to get out and she didn't. Thankfully observant neighbours saw the children on the streets, called 999 and were able to get help. The mother assumed all four kids had died and the children assumed their mother had died. It was very emotional.

The landlord was aware the smoke alarm didn't work, it was hanging from the ceiling, as proof he had a smoke alarm. This was very careless.

Again, I will not mention the house number on this road, a group of tenants living on xxx Avenue always put the wrong rubbish in their bins, not because they don't understand or cannot read/write, but because they can and they don't care. When their rubbish isn't collected, they place it at the top of the road. They also place unwanted furniture there too. Now other households have seen this and now do the same. The top of our road, across the road from xxx Mini Mart has become the local dump. It's disgusting.

Also, I feel a lot of landlords scrap the bottom of the barrel to find tenants, rather than observing the area and finding suitable tenants. It's frustrating. We have a lot of anti-social behaviour for this reason. They don't live locally and they assume it's only Tottenham so they put all sorts of unsuitable characters here.

We have constant loud music, feral behaviour, excessive street rubbish and much more, because landlords are greedy for the rent.

There is also a lot of overcrowding. It's unbelievable. I've observed so many pest control vans visit my road often, it's disgusting.

Tottenham needs a revamp and it won't get that until landlords start renting to better tenants. Whilst scraping the bottom of the barrel is appealing, as it's quick occupancy, therefore quick rent. They do not consider the impact of their tenants on the current setup/environment.

Regards

xxx

Response 24 (26/07/21)

Dear Sir/Madam,

I received a letter in the post regarding the proposed Selective Property Licensing Scheme over the weekend, and I would just like to register my opposition not just to the proposal but also to the way the consultation is being carried out.

- First of all, I would like to know why only Tenants are being sent letters to provide feedback on the proposed licensing scheme, since Landlords would be the parties responsible for paying for licensing and bearing the license conditions?? I would like to register such a method of consultation as extremely unfair to Landlords and unbalanced in favour of tenants who of course are most likely to respond in favour of licensing since they would not be bearing the costs of licensing and likely are not aware or interested in long-term consequences which would likely negatively affect the private rental market.
- Secondly, I would like to express opposition to any proposed landlord licensing scheme in Haringey and attempting to make Landlords responsible for illegal dumping of rubbish and antisocial behaviour. These are offences which the Council and Police should be directly responsible for, not Landlords who should only be responsible for ensuring their properties are well-maintained. I find it utterly cynical and disgraceful that the Council is attempting to shift their responsibilities in law enforcement and waste management to Landlords in a scheme which would likely backfire long-term as Landlords decide to sell their properties, evict their tenants, and also pass on higher rents due to licensing.
- Thirdly, I should like to enquire whether the proposed licensing scheme would also include short holiday letting such as via AirBNB or homeowners who may let out a room in their home?

The majority of landlords take on huge financial risks as it is when letting out a property since they often suffer default of rental payments, high repair bills, mortgage debt, and fraudsters or bad tenants who leave rental properties in shambles for landlords to clean up and repair. Yet the weight of the law remains heavily in favour of tenant rights at the expense of private landlords, who the government and local councils are keen to take advantage of and tax like money cows.

I certainly hope that this proposed landlord licensing scheme does not pass, though in my experience the fact that it has reached this point suggests strongly to me that results of the consultation will likely mean little since Haringey is likely already set on approving their proposed licensing scheme.

I have therefore placed my rental property back on the market for sale today.

Yours,

xxx

Response 25 (26/07/21)

Lynn Sellar – Private sector Housing Team,

Hope this email finds you well.

I have received a letter Ref: Selective Property Licencing Consultation.

The letter was refer to the tenant living the property but we are the owner of the property of xxx N15 since 2004.

I have filled in your online survey though decided to also send you an email explaining some of the problems of private landlords in our road and anti social behaviour, and noise.

We have lived here very happily until 2018 as quiet neighbourhood of 2 bedroom maisonette. (Max occupancy of 2 -3)

Our side of the street are Privately owned but the situation start to change since the winter of 2018.

One night in 2018 a few people moved in the middle of the night (after 00:00) to **No xxx.**

They blacked out windows and added Ventilators on the window of both front and rear of the house.

We have lost a track of how many people living in the house as every day different people were in and out all day, one time we counted 7 people (including a young child and a dog)

No xxx Start to have a loud Cheer and banging table / wall and stamping the floor (playing cards or some sort of betting behaviour) every evening after 23:00 until early in the morning of 07:00.

We informed to be quiet but did not change just got worse.

2019 Christmas eve, their behaviour got worse and we had to call the Police.

Also during lockdown they had a BBQ Party with more than 15 people in the garden (do not know how many in the house).

Based on their strict religious rules being, Orthodox Jewish Men, I cannot believe they watch Violent movies with guns and swearing in high volume….

One of their loft hatch is open all day 365 days with thunderstorm / Freezing weather this behaviour puzzles us.

Recently, our shared Leaseholder **No xxx** decided to move out from London and start to rent the property.

We had a great relationship with previous tenants, until this year April 2021, the tenants moved out due to ASB (Anti-Social Behaviour) of No xxx (their next door neighbours)

Owner of No xxx decided to use Property Agent (Cousins) who told me in person the people who is going to move in are working for Haringey council.

We are so please but it was not quite true….

The new tenants moved in with loud music with so many people.

We have posted several ASB (Anti-Social Behaviour) to Haringey Council due to Noise Nuisance (A amplifier with Mariachi Band) and illegal dumping (even translated how to recycle in Spanish/ Colombian language)

We do not know who and how many people actually living below us now.

As well as this problems of tenants of the rented property,

Parked cars with Car Alarm going off a day and a night .

Several parked scooters in the area run by several families (xxx road / xxx Road) for deliveries stand outside gathering talking and beeping (very loud) . does not feel safe area anymore, as so many private landlords renting small maisonettes houses to large noisy Columbian families, with massive overcrowding problems and anti social behaviour.

Makes working from home very hard to concentrate and hard to relax in the evenings and the weekends.

Your Sincelerey

xxx

Response 26 (28/07/21)

Good evening? Thank you for you for the letter you posted to my address.

First of all this is a very good decision you have made. So far so good it is very important to involve the landlord as well to take whole responsibility of their property from homeless people who come into the flats corridors to sleep, drink and do smoke weed in our building.

We have young children and this is very unsafe for me and my children.

Kind regards

Xxxx

Response 27 (31/07/21)

dear lynn sellar

I received your standard letter and as I have all sorts of problems getting the landlord to do the most basic repairs I would like some info who could help me deal with it etc. Main problem is draughty old fashioned windows and it is impossible to heat it goes straight out and I have come up in the morning to 5C in the winter. I would like to add my voice to the various issues you are trying to taclke.

kind regards

xxx

Response 28 (01/08/21)

Licensing for privately rented properties

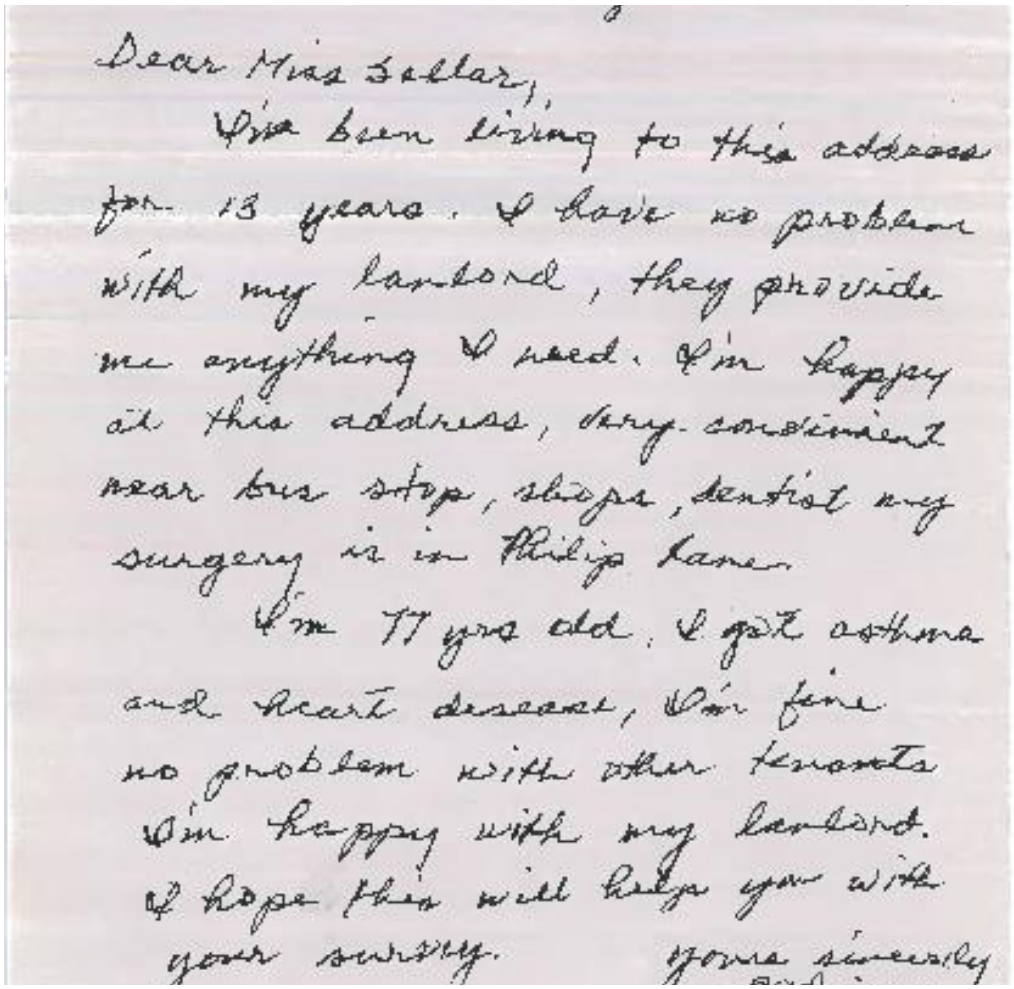
Dear Sir/Madame,

My name is xxxx and I am a private tenant within Haringey borough. I have received a letter about consultation for licensing of privately rented properties.
I would like to suggest few points about this matter:
1) The price of the licence will be passed onto tenants via rent increase.
2) xxxxxxxx
3) It will negatively affect people from the poorest background, as it stands, it is already hard to find privately rented properties for people on state benefits and it will make it even more challenging.
4) It will not stop illegal rental but will make it easier to be tracked down.

Kind regards,

xxx

Response 29 (01/08/21)



Dear Miss Sellar,

I've been living to this address for 13 years. I have no problem with my landlord, they provide me anything I need. I'm happy at this address, very convenient near bus stop, shops, dentist my surgery is in Philip Lane.

I'm 77 yrs old. I got asthma and heart disease, I'm fine no problem with other tenants I'm happy with my landlord. I hope this will help you with your survey.

Yours sincerely

Response 30 (02/08/21)

Dear Ms Sellar

Proposed selective property licensing scheme

I've received the Council's letter, addressed to me as "The Tenant", about the proposed property licensing scheme. Although I've responded to the online questionnaire, I had additional questions that I'd be grateful if you'd answer.

Anti-social behaviour (ASB)

Supporting documents on the Council website suggest a strong correlation between private rented property and anti-social behaviour, but seem to offer no evidence for this being a greater problem than in Council or housing association properties, for instance. What's the evidence for this assertion and are there any ASB statistics for non-privately rented property?

Screening and enforcement

The proposal gives no information about how the Council intends to assess licence applications (especially in terms of an applicant's fitness to be a licensee): does it include compulsory inspection of all private

properties, or financial or credit checks and examination of rental agreements? What are the criteria for refusal and will there be an appeal process? Or does licensing effectively depend on self-certification that all conditions are being met?

Crucially, there's no information on enforcement measures after a licence is granted. As the scheme and licences would last for five years, how will the Council continue to monitor and check that licence conditions are still being fulfilled after the initial application is made? Will there be annual inspections of all rented property across the whole borough to ensure that, for instance, smoke alarms are still working or that repairs are being done? What sanctions are proposed for landlords found to be in breach of their licence, over and above measures already available to the Council? (The background documents argue that these are too difficult, expensive and time-consuming to enforce.) Can a licence be revoked and what sanctions are there to prevent a landlord without one renting out a property anyway?

Identification of properties and consultation

As I said above, the letter I received was addressed to me as ''The Tenant", despite the fact that I've owned my flat for over thirty years. I realise the letter is a circular, but this suggests that the Council cannot accurately distinguish privately rented properties from those such as mine that are owner-occupied. The letter specifically asks for tenants' views, so how are private landlords being consulted?

Fees

The proposed fee structure shows discounts for early registration and for landlords registered with a "recognised accreditation scheme". There's no list of such schemes in the proposals and, given my previous point about property identification, how are landlords supposed to know about either discount? How will the Council check accreditation?

Licences are to be issued for a five-year term under a scheme that only lasts five years, but no fees are shown for new landlords applying in years two - five. Will a potential landlord in, say, year three have to pay £600 for a licence only lasting two years? This looks like a major disincentive to applying for a licence after the start of the scheme and likely to lead to increasing evasion or failure to register as time goes by.

Overall proposals

I understand the problems of poor-quality, badly-maintained properties and exploitative landlords in Haringey and see why a licensing scheme is attractive to the Council. But an effective scheme needs enforcement and sanctions, both of which the published proposal lacks. If the scheme relies on landlords self-referring, it's highly likely that "good" landlords will register while "bad" ones will continue as at present, knowing they won't be caught. If enforcement relies solely on complaints by tenants or neighbours, it's hard to see it as any improvement on existing systems which the Council says hinder it in taking action.

As it happens I also rent out a separate flat in my house (as an owner-occupier I'd presumably be exempt from licensing); the conditions shown in the consultation documents are all included in my existing tenancy agreements and the contract with the letting agents I use, both of which are already legally enforceable, so licensing seems to add little if anything to this. LB Haringey appears to have no way of identifying my dual role as both a property owner and landlord in the same building and I believe this and the other queries above undermine the premise of the licensing scheme as currently proposed.

I'd therefore be grateful for your responses to the points and questions I've raised and look forward to hearing from you shortly.

Response 31 (03/08/21)

Dear Sir/Madam,

In response to the Property Licensing consultation, I wanted to ask how it would actually benefit the area? The only things stated on Haringey's page is that they believe it would benefit the area... by simply charging landlords more money... What I want to know is - what exactly does this money go towards? Simply stating that it would help 'support' landlords understand their responsibility is an absolute farce of an excuse. There's the internet that can help people understand responsibilities. HMO's are charged fees already and now there's a proposal of any type of private rented sector... by the same people who also want to help the so-called lay person with their rents. It's ridiculous if some of these charges don't get passed on to the tenants so thus driving the rental costs up.

Obviously all this does is decrease any profit made by the landlords who sign up to the scheme - who are probably the ones who run them properly; which in turn makes it difficult for the landlords to reinvest in properties to help the upkeep unless they increase rents in line with the fees (which goes back to the cost continues back to the tenant... in a time re: covid - is this really socially ethical and morally right with the loss of jobs?) With charges left, right and centre, I really wonder what the actual intention is; To gentrify the area? To diminish all possibility for people who don't want the large bills of having to pay for an apartment or whole house... so therefore fazing out possibilities for people to save money by renting by the room??

Clarification needs to be made on the following;

-Do licensed HMO's get charged a second fee with this new licensing?

-What does the money actually go towards?

-What would happen if a property is not well looked after - what does the council actually do?

-Where is the actual local support for landlords when tenants are being difficult?

-What about people who are renting rooms in their home - is the same needed there?

Personally, I feel this needs to go back to the drawing board. My personal experience to date is that landlords have been brilliant because I choose a property that looks well kept.

Regards,

xxx

Response 32 (04/08/21)

I have a property in Crouch End which I rent out. I do not agree with your proposal to license landlords, as it adds a further layer of cost and burden onto the good landlords who always take the blame for a small unscrupulous minority of rogue Landlords. This ultimately puts the rent up to tenants. You should instead, create a system whereby dissatisfied tenants can make direct representation to the Council to have their situation investigated.

In other words, don’t penalise the many because of the few. There are more equitable ways of dealing with this problem.

Response 33 (09/08/21)

Dear Sirs,

IP write oin respect of your consultation that is taking place. I am a property solicitor with numerous years experience. I am passionate about the local communities and feel that there are numerous arrears of improvement which the landlord are ignoring to take into consideration. As a tenant of a private landlord i feel that landlord are frankly getting away with murder.

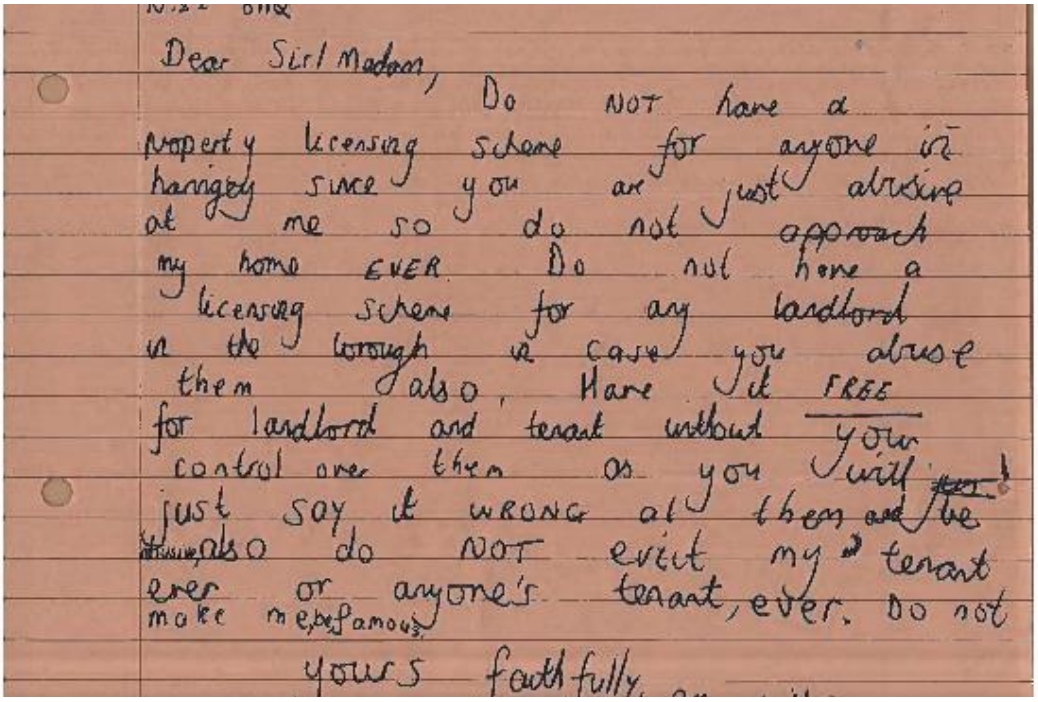
They are getting penalised and being held to account as they should be as evidenced by the Grenfell tower disaster. Although various consultation are taking place the tenants lives are being put at risk due to the lack of response of some of the employees of the public and private sector.

Areas of improve are firesafety standers, lack of improvement of housing disrepair building in both public and private sector,lack of legal representation and advise for those with substantial disrepair needs access to support as a private tenant my landlord often fails to stick to appointments, he targets people who are muslims and has others who work for him with his employees. Arears of outstanding repair are such as firesafety regulay checks, lack of electrical checks, poor water quality , dry rot, black mold, damp, poor water quality and pressure, lack of recycling, building repairs, cheap materials and substandard contractors which landlord only wishes to pay at minumum price and for minimal hours. lack of planning and asbestos control, lack of insullation, damp and cracks throughout both vertical and horizontal. A very cocky and non shoddy landlord who has the support of other officals in the public sector who do not wish to carry out works as they have said they dispose of people and use public spending for there own use. They bully employees and we as tenants suffer.

I am sorry for delay in sending this but was in accident and emergency due to head injury and various other islamophobic injuries sustained due to the systematic targetting of these thugs.

Kind regards xxxx

Response 34 (received from Haringey on 13/08/21)

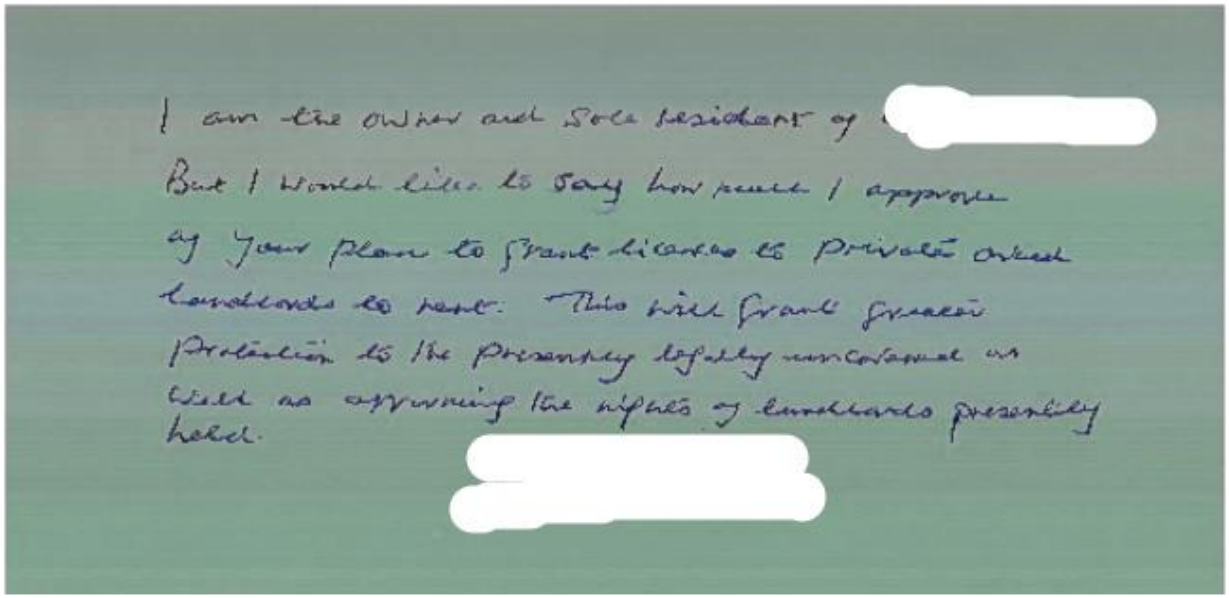


Dear Sir/Madam,

Do NOT have a property licensing scheme for anyone in haringey since you are just abusing at me so do not approach my home EVER. Do not have a licensing scheme for any landlord in the borough in case you abuse them also. Have it FREE for landlord and tenant without your control over them as you will just say it WRONG at them and be also do NOT evict my tenant ever or anyone's tenant, ever. Do not make me famous.

yours faithfully

Response 35 (received from Haringey on 13/08/21)


I am the owner and sole resident of [redacted]
But I would like to say how much I approve of your plan to grant licences to private rented landlords to rent. This will grant greater protection to the presently legally unregulated as well as approving the rights of landlords presently held.
[redacted]

Response 36 (25/08/21)

Dear xxx

I hope you are keeping well.

I wasn't sure which officers to contact about this but there is a property licensing consultation going on at the moment. Letters have been sent to properties in the Miltons and Archway Road. However when you click onto the consultation survey Highgate is not listed as one of the wards which are being consulted on. This is causing some confusion.

Has Highgate been missed off the survey list or have letters been sent in error.

I would like to strongly lobby for the Miltons and Archway Rd to be included. We have many very poor quality private rental flats, very transient residents, and a high rate of anti-social behaviour and repeated bin contamination.

I look forward to hearing from you.

Kind regards

xxx

London Borough Haringey Selective Property Licensing

Appendix 4

Council's Responses to Consultation Feedback Report

Proposed Selective Property Licensing Scheme for the London Borough of Haringey

Council's consideration of Consultee's responses to the Public Consultation

March 2022

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Introduction

Background

Last year, we held a public consultation to gather views on our proposal to introduce a targeted selective licensing scheme, with the aim of tackling the growing issues that are being experienced in our Private Rented Sector (PRS). The consultation ran for 16 weeks from 17th May to 5th September 2021, and was widely publicised, both within Haringey and beyond, to encourage landlords, tenants, agents, residents, businesses, and other interested parties to get involved.

In total, the consultation generated 956 survey responses (950 online and 6 postal). 27 people attended three public workshops, 7 stakeholders were interviewed, and 36 individuals or organisations responded with formal written submissions to the consultation.

We would like to thank everyone who took part and shared their views on our proposal. We have carefully considered all feedback received. This document summarises the main feedback raised by respondents across all methods of consultation, followed by our official response to the views shared.

Responses are broken down by theme in accordance with the consultation outcome report and a full list of themes covered can be found in the index. Where available, verbatim comments from consultees have been provided and all changes made to the proposal as a result of the feedback received are summarised on page 4.

Alongside this consultation response document, we have published updated versions of our licence conditions and fee structure. You may also be interested in reading the detailed report of the consultation results, which was produced and analysed by the independent research company who ran the consultation, MEL Research Ltd.

Key

Type of feedback		Outcome of consultation	
	Survey response	ACCEPTED:	Council agrees with feedback
	Written submission	REJECTED:	Council disagrees with feedback
	Stakeholder interview	CLARIFIED:	Council position clarified
	Public meeting	TO BE KEPT UNDER REVIEW	Feedback to be considered again at a later date.
Changes made to the proposal		**Themes**	
	Proposal changed in response to consultation feedback	*Theme X.XX*	Theme number in order of occurrence in the consultation report.
	No change to the proposal		Theme arose in response to more than one survey question.

Summary of changes made in consideration of responses

All feedback received in response to the consultation has been carefully considered. This has informed a number of changes to our proposed scheme. Most notably, we have **removed Anti-Social Behaviour** as a ground for introducing the scheme and we have **removed Designation Two, which would have extended the scheme to Hornsey and Stroud Green**.

A full list of changes made to the proposal are listed below.

Theme reference	Feedback	Change
Report section: *Views on proposal to designate specified wards for Selective Licensing*		
1.11	Not enough evidence for significant and persistent ASB to be used as a ground for introducing selective licensing in Haringey.	This ground has been removed from the proposal and the related licence conditions have also been removed.
1.12	Lack of evidence to justify the need for designation two.	This designation has been removed from the proposal.
Report section: *Views on proposed licence fees*		
2.1.3	Fee structure should be varied for those seeking to licence multiple properties.	Fee structure updated to explain what our policy will be for landlords seeking to licence more than one self-contained flat in a building.[1]
2.1.5	Licence fee split is unclear.	Fee structure has been updated to include a breakdown of the Part A and Part B fee split and further explanatory text.[2]
2.2.4	Criteria for qualifying for an 'accredited discount' are unclear.	Fee structure has been updated to include a full list of accepted membership bodies and accreditation schemes.[3]
Report section: *Views on proposed licence conditions*		
3.1	Requirement to produce quarterly rent statements is unnecessary.	This condition has been removed.
3.2	Requirement for landlords to obtain a reference to confirm a tenant's 'good character' could make it harder for vulnerable people, first-time renters, and migrants to let a property.	This condition is mandated by law but has been reworded to make it less restrictive and onerous for landlords.[4]

[1] Fee structure, section 7
[2] Fee structure, sections 8 & 9
[3] Fee structure, section 5
[4] License conditions, 1.2

3.3	Landlords should be set specific timeframes for dealing with disrepair and defects.	Licence conditions to regulate property conditions are prohibited. However, a clause has been added to the conditions to ensure landlords are given clear timescales when responding to Council requests.
3.15	Scheme should be used to help improve the energy efficiency of PRS properties.	Fee structure has been updated to incentivise better energy performance. Landlords can now apply for a discount if their rental property has an EPC rating of C or above. [5]
Report section: *Other views and suggestions on the proposed scheme*		
No related changes made.		

[5] Fee structure, section 6

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Views on proposal to designate specified wards for Selective Licensing

Section overview

Survey respondents were asked to provide their reasons for agreeing or disagreeing with the proposed scheme. The most common reason for agreeing was that respondents felt that selective licensing would **improve living conditions, standards & safety, the local area, monitoring & control, and provide tenants with greater protection** (32% of comments). In contrast, the most common reason for disagreeing was **costs may be passed on to tenants** (7% of comments).

This section provides examples of the positive feedback received and addresses the main concerns raised by consultees.

Relevant survey question:

S5Q1: To what extent do you agree or disagree with the proposal to designate the specified wards for Selective Licensing? Please tell us the reason for your answer.

Survey results at a glance



Agree: 56%



Disagree: 34%



Don't know: 10%

Feedback in support of the scheme

Example comments from consultees	
"It will benefit private tenants who currently have very little security about where they live and are often left to manage issues in properties that leave them out of pocket, or which they are charged for when moving out"	"As a landlord I'm highly supportive of a licensing scheme - for all landlords, not just landlords of HMOs. It would set clear guidelines for me and tenants, and reassure my tenants about the experience they should expect"
"I think your licensing scheme is a good idea for many reasons. Some of the rented properties on my house and in appalling condition, but people live there as it's cheap."	"I think it would be beneficial to tenants by making their voices heard and allowing issues to be resolved more quickly."
"It will help make landlords more accountable and encourage them to take a more active interest in the property/area, rather than just seeing it as a source of passive income."	"In my experience as a Social Worker in Haringey, and a private rented tenant in Haringey for many years, these are the areas that would benefit from a selective licensing scheme."
"These are the most obviously deprived areas of the borough compared to say like Crouch End or Highgate."	"I strongly agree as the issue of damp and disrepair, rubbish, graffiti and noises are abundant on these areas."

Feedback expressing concerns in relation to the scheme

Example comments from consultees	Council's consideration
Theme 1.1: It should be borough-wide	
"I think it should apply borough wide so that it doesn't disproportionately affect some areas more than others. There is poor housing across the borough and a tenant shouldn't be reliant on where they live to get help"	TO BE KEPT UNDER REVIEW: By law[6], we can only designate an area to be subject to selective licensing if we are satisfied that there is evidence to support the existence of the issues the scheme aims to combat and, we can demonstrate that our existing powers alone would not be sufficient in tackling the problems identified. After conducting a detailed analysis of the evidence available, we were unable to find sufficient grounds for proposing a borough-wide scheme to tackle poor property conditions and deprivation. As a council, we remain committed to driving up the quality of housing for everyone[7]. We believe that selective licensing will help to bolster our existing strategies to tackle the issues faced across our private rented sector and, in turn, play an important role in bridging the inequality gaps observed between the East and West sides of the borough. As for the areas not included in the scheme, to ensure that current standards are maintained and improved, we will continue to use our existing enforcement tools (on a reactive basis) to deal with any reported issues. Moreover, we will continue to monitor property standards in the excluded wards and, should future evidence suggest that they would qualify for selective licensing, we will seek to extend the scheme.
"It needs to be implemented in the whole borough"	
"This is not an issue that applies only in some wards. It is applicable across the borough. It is unfair to not provide this additional safeguard throughout Haringey"	
"Let's not be selective. All of Haringey or none."	
"They are now dividing the borough as a rich man poor man zone rather than treat all the residents fairly and unify the borough"	

[6] Housing Act 2004, Section 80
[7] Priority 1: Housing - Outcome 3, Borough Plan 2019-23

Theme 1.2: Costs may be passed on to tenants	
"You will charge the landlords for licensing and this charge will reflect on our rent. Therefore, I am against this scheme. You should come up with a better idea."	REJECTED: At Haringey, we aim to use our resources in a sustainable way that prioritises the needs of the most vulnerable residents[8]. Our proposed scheme has been carefully designed to deliver good value for money for residents and landlords alike. To obtain a selective licence, landlords will need to pay a one-off fee of £600 for coverage across the five-year duration of the scheme. This equates to £2.30 per week and is not considered unaffordable in comparison to the average rental income in Haringey at present (£1500 per month[9]). Independent research into the effectiveness of selective licensing[10] (on behalf of the Government) found no evidence to support the claim that licensing increases rents by landlords passing on the costs to their tenants. The report concluded that *'the privately rented sector is a competitive market and market forces mean that rents are set at a level the market will bear'*. Similarly, feedback from other local authorities operating licensing schemes has not shown any evidence of costs being transferred to tenants. In the unlikely event that landlords wish to increase rents as a result of the scheme, there are statutory procedures which must be followed and any increase above market rates can be challenged via the Residential Property Tribunal[11]. We will ensure that this provision is highlighted in our supporting campaign to raise tenants' awareness of their rights.
"The scheme is likely to cause hardship by forcing rents up and leading to increased homelessness at a time when the economy is already struggling."	
"The price of the licence will be passed onto tenants via rent increases."	
Citizens Advice felt that the fees would be passed onto tenants from a small proportion of landlords, not all, as they have seen evidence of that elsewhere.	
Participants commented that the costs to landlords will be passed to tenants in rent increases, therefore making it not just a tax on landlords, but on renters.	

[8] Priority 5: Our Council - Outcome 20, Borough Plan 2019-23
[9] Median monthly private rent in Haringey, 12 month rolling period to Q2 2020-21
[10] An Independent Review of the Use and Effectiveness of Selective Licensing, 2019 (page 77)
[11] Government guidance for solving a residential property dispute

Theme 1.3: It will not solve the issues identified	
"I think that further licence on good landlords is unfair and overly intrusive. I don't believe yet a new licence will resolve the objectives stated."	REJECTED: A recent independent review into the effectiveness of selective licensing[12] identified that overall *'selective licensing can be an effective policy tool with many schemes achieving demonstrable positive outcomes'*. To maximise the potential success of the scheme, we have set challenging objectives that are linked to our wider strategic outcomes and initiatives. For example, we will *'ensure that at least 75% of licensable properties are licensed by the end of the scheme'*. These objectives will be closely monitored throughout the duration of the scheme. We have also had great, first-hand success at driving-up standards through our previous property licensing schemes for Houses in Multiple Occupation (HMOs). In our Tottenham additional HMO licensing scheme, which ran from 2015 to 2020, 92% of all HMO properties inspected failed to meet minimum fire safety measures and 82% of properties lacked adequate security measures. Following compliance inspections, all of these properties now meet the minimum standards. Without licensing, we would have been reliant on reactive measures to identify these hazards, which would have most likely led to the majority of them remaining undetected. Not only does this showcase the licensing team's effectiveness at targeting non-compliant properties, but it also illustrates how critical licensing can be for ensuring tenant safety in the borough's most deprived areas. We believe that these results will be emulated by our selective licensing proposal, as we continue to build upon our existing expertise of administering effective licensing schemes.
"I'm not sure if it was implemented that it would make any difference at all"	
"No confidence that the council can or will improve the problems and matters of concern. It appears that anyone can just do as they like regardless and there is no authority or care to stop them. It's become a 'free for all'."	
"This is not the solution to the problem your survey is about. If there are specific problems on specific areas then these need to be addressed within those areas. This broad approach is entirely unreasonable."	
"The money should be spent on more important things for the borough. This is not going to change the problems alluded to in this survey. Will cause costs, work and not concentrate on what really needs to be improved."	

[12] An Independent Review of the Use and Effectiveness of Selective Licensing, 2019 (page 7)

Theme 1.4: It is a money-making scheme	
"This is simply a way of the council deferring responsibility to and creating an income stream from private landlords"	REJECTED: By law[13], we are not allowed to make money from licensing schemes and fees must be reasonable and proportionate to the costs of running a scheme. Therefore, our proposed fee structure is cost neutral; revenue does not exceed running costs. Fee calculations have been informed by the running costs of our existing licensing schemes and robust assumptions have been made about the anticipated income of the scheme, based on the number of properties we expect to licence over its five-year duration.
"Looks like the council want to generate more income. What needs to happen is, they need to manage the income they collect from council tax more efficiently."	
"There is no reason for this since we all have very good management and good behaviour and no rubbish on the streets it looks like just a money-making business"	
"Selective licensing is just a new way to claw in some extra money from the rest of the rented properties in your borough"	
"Requiring landlords to obtain a licence from Haringey Council before renting their properties sounds like a power & money grab to me, and is in my opinion the worst idea since the inception of Low Traffic Neighbourhoods"	
Theme 1.5: It penalises good landlords and bad landlords will continue to operate	
"This scheme financially penalises good landlords who are effectively being expected to pay for the council to address problems created by bad landlords. This is outrageous. As a local authority you should already be tackling bad landlords. If such a scheme is to be implemented, it should only be applied to bad landlords who should continue to be monitored!"	REJECTED: Our research has found that a significant number of privately rented properties in Haringey are poorly managed and suffer from serious disrepair. We therefore intend to concentrate the majority of the scheme's resources on delivering a proactive enforcement approach that targets unlicensed properties and those properties posing the greatest risk. Haringey recognises that many landlords are competent, professional and take their responsibilities seriously. We also appreciate that not all landlords are deliberately non-compliant. Inexperienced or single-unit landlords may be ignorant of their responsibilities and unknowingly flout the law.
"Every landlord will be paying the Council to enforce standards on a small minority of bad landlords."	
"Bad landlords get away with providing poor accommodation and bringing in this policy will not change that; the council should put their efforts in to dealing with them rather than penalising good landlords."	

[13] Article 13(2) of the EU Services Directive (2006/123/EC)

"Good landlords keep their properties in good and safe repair, Why should they be penalised and pay?"	One of the key benefits of selective licensing is that it encourages increased engagement between landlords and local authorities. Through the scheme, we will help landlords to understand their responsibilities and ensure their properties are safe and well-maintained. Thus, eliminating the potential of future enforcement action for well-intended landlords. In the spirit of greater collaboration, we will be rewarding landlords for early registration to the scheme. This takes into account the fact that such landlords are likely to already be compliant with their statutory duties.
"I do not agree with your proposal to licence landlords, as it adds a further layer of cost and burden onto the good landlords who always take the blame for a small unscrupulous minority of rogue landlords."	
Theme 1.6: Additional costs will be a strain for landlords	
"It will be a financial burden in this difficult time and will not make a difference in the level of service to the community"	REJECTED: As explained in response to Theme 1.2, the proposed cost of a licence is nominal when broken down on a weekly basis in comparison to the average market rate for rent in Haringey. It is therefore unlikely that this will financially impact landlords. We would also like to reiterate that we see licencing as an opportunity for improved engagement with landlords. Where we can reduce costs for compliant landlords, we shall - incentives will be awarded for early registration and accreditation.[14]
"No need to add more expenses on landlords. We can achieve the same with adding legislation without making the landlords pay £1,000 for a license. I believe landlords pay enough as it is for mortgage, maintenance etc. Not all landlords are rich a lot of them can't live off a few rental investments"	
"It's another cost to the landlords who already have huge overheads Haringey council themselves do not in some instances maintain their properties to the same standards. This is not going to solve the issues of rouge landlords and overcrowded housing, which there is already regulations in place. There needs to be more policing of the current policies to start with."	
"We are a landlord and managing agent who have been providing both leased properties to the Homes for Haringey team and temporary accommodation for over 30 years. There are already significant and costly compliances that landlords have to adhere to. The introduction of a mandatory licensing for all properties will	

[14] An early application fee cannot be claimed in conjunction with any other discount.

cripple landlords who have already been impacted by massive loss of rent during covid and increase yearly costs."	
"I believe that this will mostly be another form of taxation rather than a way to improve the quality of the privately rented properties and the residents' lives."	
Theme 1.7: It will reduce availability of housing and push landlords away from the area	
"I disagree as you will make it almost impossible for landlords to rent a property therefore discouraging landlord to rent their property in the first place. This will therefore cause a shortage of private rented properties leading to more people to request council property."	REJECTED: A recent independent review into the effectiveness of selective licensing[15] found no clear evidence to support the claim that landlords may sell their properties as a result of selective licensing and reduce the supply of housing. We have also seen no evidence of this through implementing our additional HMO licensing scheme. It is difficult to see why a landlord would go to such lengths to avoid paying a licence fee, given the potential loss of rental income would by far outweigh the licence costs. Furthermore, we do not intend to implement onerous licence conditions, only those required to address the issues of poor property management in the proposed designation area and those stipulated by the law[16] to reinforce landlords existing legal duties.
"Landlords are already responsible for ensuring their properties are well maintained. The licensing scheme will be yet another layer of burdensome bureaucracy for all concerned and add to the pressure on landlords to sell up therefore reducing the amount of much needed property to rent in Haringey."	
"I am concerned that it will put off good private landlords from renting their property and thus making the rental market even more competitive and pricy as there are less options."	
"I understand you wish to stamp out rogue/slum landlords, but if too much admin is required/ additional costs incurred with the licensing, I am concerned my own landlord will simply opt to sell up. If others do the same, I will struggle to find a property/rents will rise"	
Participants questioned the negative impact that the scheme may have on landlords, and suggested that some may leave the sector, therefore reducing the number of properties available to rent	
Theme 1.8: It is too bureaucratic	
"I think there is already too much paperwork and bureaucracy for landlords, but I agree there are issues that need addressing in certain areas. I think a more selective solution is needed to solve	REJECTED: As a council, we already have experience of operating effective licensing schemes and currently run a borough-wide scheme for property rented as a House in Multiple Occupation (HMO).

[15] An Independent Review of the Use and Effectiveness of Selective Licensing, 2019 (page 77)
[16] Housing Act 2004, Section 90 (4)

these problems - not one that adds more complications to the existing system"	Our recently instated specialist licence management system allows for the streamlined, end-to-end processing of licence applications. Licences are issued electronically, and officers are able to monitor the life-cycle of all applications through the system. This has removed a lot of the bureaucracy and antiquated elements associated with the historic licensing process. In addition, the user-interface is fully accessible and designed with both individual and portfolio landlords in mind.
"There are already measures and legal framework to deal with landlords' negligence. This scheme will just make it more expensive and cumbersome to rent properties out, with little or no value added."	
"Unnecessary bureaucracy which I don't feel will solve the problems."	
"Landlords will manage to get around the licensing issues and then it will just turn into more unnecessary admin and red tape that doesn't help anyone and probably increases the amount of council tax I pay."	
"Sounds like another level of bureaucracy and administration being implemented by the council rather than common sense use of the council's time."	
Theme 1.9: There is already legislation in place to regulate the PRS	
"There are already measures and legal framework to deal with landlords' negligence."	REJECTED: Haringey believes selective licensing is a necessary tool to bolster our existing enforcement regime and achieve greater compliance in the PRS. Licensing stands out against other measures considered as it offers a much-needed proactive inspection approach and provides clearly defined offences (licensed/unlicensed) which simplify enforcement. Furthermore, we do not believe that, either individually or collectively, the other measures considered would prove to be as effective as a means of tackling poor housing conditions and deprivation in the proposed designation area. Nor can they deliver the scale of improvement that we believe is required. Options appraised included:
"Landlords are already regulated with respect to fire safety for houses in multiple occupation and building regs and council enforcement powers provide a sufficient remedy."	
"There are already regulations governing the standard of rented properties - the Council must use these existing powers and must inform tenants that they have a right to the Council's support if a landlord is providing substandard accommodation."	
"Landlords are already bound by laws that outline what the licence scheme is set to cover. This is a pointless exercise that will take money away from landlords which could be better spent maintaining properties. "	
"Councils already have the authority to tackle low standard accommodation and take action against offenders. Clearly they are failing in their duty"	

	• Greater use of our powers to deal with hazards identified under the Housing Health and Safety Rating System (HHSRS)[17]and powers to protect public health[18] – discarded as formal action is generally a slow process and these powers do not place any obligation on landlords to be proactive in improving conditions. • Ramping up the usage of our other existing enforcement powers and tools – discarded as it is resource intensive, reliant on reactive responses to complaints and does not incentivise landlords to improve their property conditions. • Voluntary accreditation scheme to facilitate improvement in the PRS – discarded as it is difficult to oversee such programmes, does a poor job of tackling rogue landlords and is also resource intensive.
Theme 1.10: There is a lack of evidence of licensing working	
"I strongly agree that something needs to be done to improve the situation, but I need to see more evidence before I could feel confident that selective licensing would be a real solution."	REJECTED: The Chartered Institute of Environmental Health and the Chartered Institute of Housing published a joint review of selective licensing[19]. 20 councils participated in the research, which analysed the performance of 37 schemes (27 in operation and 10 concluded). The review found that many licensing schemes were delivering significant benefits in terms of tackling property conditions and anti-social behaviour. These findings were echoed by an independent review of selective licensing commissioned by the Government. The report concluded that *selective licensing can be an effective policy tool with many schemes achieving demonstrable positive outcomes'.*[20]
"I see no evidence from boroughs that have introduced it [selective licensing] that there has been any improvement in anti-social behaviour or the quality of homes that are let."	
"I didn't see any evidence in the (landlord licensing) report that those areas that have used landlord licensing have benefitted from more satisfied and better-behaved tenants. The landlord licensing scheme in Liverpool was discontinued after running for 5 years for eg: there weren't many tenant accommodation complaints"	
"The "Haringey Council Selective Licensing Evidence Report for Consultation" does not provide evidence for how such licensing schemes have worked in other Councils"	

[17] Housing Act 2004, Part 1
[18] Those stipulated in the Health and Social Care Act 2012
[19] A licence to rent - CIH & CIEH 2019
[20] An Independent Review of the Use and Effectiveness of Selective Licensing, 2019 (page 7)

"As an HMO landlord, I am aware that Haringey have implemented licensing schemes for the past 7 years and can show no evidence that the scheme improves the conditions or the behaviour of tenants. Haringey Selective Leasing staff are unqualified to address any issues and lack the evidence or experience to make any meaningful improvement input."	REJECTED: As mentioned in response to Theme 1.3, we have had demonstrable success at driving-up standards through our previous property licensing schemes for Houses in Multiple Occupation (HMOs). Furthermore, we have a strong team of staff who all receive regular training and support to ensure they are up to date on the latest legislative changes and best practice.
Theme 1.11: Not enough evidence to use ASB as a ground for applying for a scheme	
"The evidence of ASB is just not there."	ACCEPTED: In light of the feedback received in response to the public consultation, we have reviewed our evidence base for designating the proposed areas for selective licensing on the grounds of anti-social behaviour. Following this review, we have recognised that the data analysed is not robust enough to evidence that we are consistently experiencing significant and persistent anti-social behaviour linked to our private rented sector across all of the wards to be included within the designation areas. We have therefore removed anti-social behaviour as a condition for our proposed selective licensing scheme. We accept that comparing incidences of anti-social behaviour in the private rented sector against the social rented sector, can be a useful indicator of their prevalence and this is something we could explore for future proposals. However, we are not obliged to do so in order to designate an area for selective licensing on the grounds of pervasive anti-social behaviour. The legislation only asks us to evidence that private sector landlords in the designated areas are not effectively dealing with incidences of anti-social behaviour caused by their tenants (or people visiting their
"No evidence is supplied to show there's a lack of ASB in council-owned or managed properties to support the contention that private rental in itself is more likely to cause ASB problems."	
"Private rented properties are not the main issue, council rented properties or those given to housing associations are the problem. I'd like to see the stats on ASBs versus council or housing association properties."	
"Anti-social behaviour: the evidence does not show that this is correlated with the PRS. It is just asserted that levels are high but there is no comparison with complaints from the social sector for instance."	
"Supporting documents on the Council website suggest a strong correlation between private rented property and anti-social behaviour, but seem to offer no evidence for this being a greater problem than in Council or housing association properties, for instance... are there any ASB statistics for non-privately rented property?"	

	properties), and that this failure is either causing or significantly contributing to the problem of anti-social behaviour.[21] Notwithstanding this decision, Haringey recognises that it is still important that we seek to explore alternatives to licensing to address the issues relating to poor waste management that were identified by the consultation.
Theme 1.12: Don't agree with the area selected for Designation 2	
"The further licensing of PRS accommodation in addition to HMO's is LONG OVERDUE. However, it is not at all clear why Hornsey and Stroud Green appear to need their own 'separate' licensing scheme."	ACCEPTED: Before designating an area for selective licensing, we must be satisfied that it meets the strict conditions for introducing a scheme as set out by the law[22]. In light of the feedback received in response to the public consultation, we have further reviewed the evidence for designation two and have identified that the data analysed does not sufficiently evidence that Hornsey and Stroud Green are experiencing high levels of deprivation when taking account of all other contributory elements used to measure deprivation (i.e. living environment, crime, barriers to housing and services etc.). On this basis, we have removed designation two from our proposed selective licencing scheme. We will continue to use our existing enforcement tools in Hornsey and Stroud Green to deal with any reported issues and ensure that current standards are maintained and improved,
"If you look at the stats for Stroud Green it should not be included when compared to the other areas. In essence the problem, is in the east of the borough to the east of the train track into Finsbury Park. The challenge is that if you live to the west of the train track, the problems identified are not a day-to-day experience and people in Stroud Green, Crouch End, Highgate, etc do not go to the east of the borough at all. Therefore, Designation 2 is not justified on the statistics."	
"Hornsey has quality accommodation and does not have the deprivation and social problems like Tottenham"	
"Hornsey and Stroud Green should not be on the list. Other areas should be prioritised."	
Participants asked why some areas were in and others not when the evidence proposed showed mixed evidence that could include/exclude wards (for example Hornsey being in, but Crouch End being out).	

[21] Selective licensing in the private rented sector: A Guide for local authorities (March 2015), page 9 - MHCLG
[22] Housing Act 2004, Section 80

Theme 1.13: Unfair to landlords as tenants sometimes are to blame (ASB)	
"It shouldn't be the landlord's responsibility to resolve ASB issues and police tenants. This is the role of the police and council."	REJECTED: Whilst we have removed pervasive anti-social behaviour as a ground for introducing our proposed scheme (see Theme 1.11), we still welcome the opportunity to clarify our expectations of landlords when dealing with ASB. Haringey agrees that it is the responsibility of all residents in the borough not to cause anti-social behaviour and recognises the important role that we (and others) play in using our enforcement powers. We will always take a fair and balanced, evidential approach to enforcement We do not expect landlords to be responsible for the behaviour of their tenants. However, landlords are responsible for the proper management of their tenancies and ensuring that any ASB caused by their tenants is effectively addressed, and if necessary, appropriate action is taken. As there are a wide range of behaviours that could constitute anti-social behaviour, landlords may choose to take various approaches to preventing and managing ASB. Examples of such measures include, but are not limited to: • carrying out pre-tenancy checks such as obtaining a reference from the prospective tenant's old landlord or a general character reference from somebody reputable such as an employer; • regular inspections of the property to ensure that it remains a single occupancy premises; and • including specific terms regarding anti-social behaviour within their tenancy agreements to rely on should any future action be required and to ensure that their tenants are aware of their responsibilities.
"In most cases, the problem is not the landlord, but the tenants who are being anti-social. Placing the onus on landlords to be responsible for the behaviour of their tenants is inherently unfair, especially since existing law significantly restricts landlord's ability to interfere in their tenants' behaviour or lives (not that most would want to in the first place). It is entirely un-just to expect landlords to enforce these sorts of policies on your behalf if they aren't, for example, able to easily evict offending tenants."	
"Since most of the ASB issues are caused by tenants, not landlords, that's a policing matter and will not be addressed through Haringey council finding new fees to impose on supposed rich landlords."	
"Rather than selective licensing, more attention should be given to enforcement against anti-social behaviour and littering by direct perpetrators. It should not be the landlord's responsibility for the behaviour of their tenants, which is what Haringey seems to be trying to create by a licensing scheme. They are landlords, not parents."	
"How are we to manage any behaviour of our tenants and police what they do 24/7? This feels like all responsibility is being thrown onto landlords, most of whom choose tenants carefully, carry out thorough checks etc. How can we then sort out any further issues around their behaviour etc without constantly calling the police? It seems highly unfair."	

Theme 1.14: Other	
A few participants asked how landlords are going to be forced to come forward and how the Council will ensure that not just good landlords take part in the scheme.	CLARIFIED: We recognise that a proactive approach to inspections will be essential to delivering the objectives of our scheme. As part of the evidence building required to formulate our proposal, we commissioned specialist tenure intelligence modelling to help identify where in our borough private rented properties may be located. Although this was not 100% accurate[23], we believe it will be an effective tool for targeting and identifying potential licensable premises. We also have a 'report it' tool on our website for both tenants and members of the public to report any suspected, unlicensed premises to our licensing team for investigation. This will be widely publicised via our communication channels to help spread the word, including social media posts and messages on our community noticeboards. In addition, council partners who are working predominantly outside in our neighbourhoods, or with private sector tenants, will be trained on how to identify privately rented homes and check if they are licensed.
One tenant asked how the Council is going to protect the scheme from hurting tenants, as they will be affected by fees being passed onto them and also any retaliations if they do complain to the Council about their landlord.	CLARIFIED: A significant advantage of selective licensing is that it gives us the power to enter a property and (if necessary) proceed to take enforcement action without providing a landlord with 24 hours' notice[24] This will provide vulnerable tenants with greater protection from retaliatory 'no fault' evictions and help us to uncover and penalise 'rogue' landlords. Please also refer to Theme 1.2.
One participant asked how impact is going to be measured (such as what KPIs are going to be in place), whilst another asked whether the Council will track changes in private rental availability as a result of the scheme.	CLARIFIED: We have set challenging objectives for the scheme that are linked to our wider strategic outcomes and initiatives. These will be monitored internally by the relevant governing body and externally through the Department for Levelling up, Housing and Communities.

[23] Validation tests found that the accuracy rate for the predictive data was 86%.
[24] Housing Act 2004, Section 239

Views on proposed licence fees

Section overview	Relevant survey questions:
The survey asked respondents if they had any comments about the proposed fees. Again, the most common reason for disagreeing was that the **costs may be passed on to tenants/rents will increase/ rent control is needed** (30% of comments). Please refer to Theme 1.2 for the Council's response. The survey then elicited further feedback from respondents on the proposed discounts. The first asked respondents if they had any comments about whether there were any discounts that should be removed. The second asked respondents to provide suggestions on any additional discounts that the Council should consider. This section responds to the main concerns raised by consultees and considers suggestions received relating to the proposed fee structure including discounts.	S7Q1: To what extent do you agree or disagree with the proposed fee for Selective Licensing? If you have any comments about the fees, please provide these below. S7Q3: Are there any discounts that should be removed? these below. S7Q4.; Are there additional discounts that could be considered?

Survey results at a glance (S7Q1)



To what extent do you agree or disagree with the proposed fee for Selective Licensing

Example comments from consultees	Council's consideration
Theme 2.1.1: Costs too high	
"Way too expensive and unclear how the money is used"	REJECTED: As stated in response to Theme 1.4, it is illegal for us to profit from licensing schemes[25]. Our proposed fees have been calculated based on the cost of setting up and operating a licensing scheme. This includes ensuring that all costs incurred would be met by the income generated from the number of properties we expect to licence during the life of the scheme.
"It is about 10 times the cost I was expecting and is not justifiable."	
"It's an extortionate amount for business owners (landlords)."	
"The fee is excessive. What is the local authority actually going to do with this fee."	
"Too expensive. cost to run the scheme wouldn't be over 250"	

[25] Article 13(2) of the EU Services Directive (2006/123/EC)

	We have also benchmarked our fees against other local authorities' charges for a selective license and can confirm that our proposed fee is in line with the average licence cost in London.
Theme 2.1.2: Costs too low	
"£600 is far too small, given that Landlords are renting out rooms for as much as £400 a week, and houses for £1500-2500 a week! "	REJECTED: As mentioned above, our proposed fees have been calculated based on the cost of setting up and operating a licensing scheme, the costs will be met by the income generated from the number of properties we expect to licence during the life of the scheme. For greater transparency, we have reviewed and updated our fee structure, provided better explanatory text and included a breakdown of the Part A and Part B fee split. We have also set ambitious, yet achievable, objectives to ensure ongoing compliance and that we use the income generated by the scheme to deliver the greatest impact.
Citizens Advice were concerned that the proposed fees would not cover the inspection/enforcement that would be required for such a sizeable scheme.	
The NRLA didn't feel the fees stacked up and were too low. They also suggested the way these had been laid out was incorrect, for example Part A and Part B of the fees, where they felt there was little evidence that they had split the fee.	
"I would want them to be higher to give you more money to spend on enforcement activity and to discourage landlords from owning and renting out multiple properties."	
"The Early Bird fee could be higher, say £350"	CLARIFIED: We can confirm that our early application fee is already set at £350. We have updated our fee structure document to make this clearer. The £250 stated in the previous version made reference to the level of reduction we planned to award, rather than the cost of an early application.
Theme 2.1.3: Different fee structure depending on size of property/number of properties/value of property	
"Fee should be proportional to the value of the property."	PARTIALLY ACCEPTED: By law[26], our proposed licence fee must be based on the costs of running the scheme - setting it up, administering the licences, inspections, and enforcement. It is not permitted for the set fee to be based on the size or rental value of a property. In regard to varying the fee structure for landlords with multiple properties, in light of the feedback received, we have revised our fee
"The fee should be in line with the property size/bedrooms and if possible actual rental value. No fee for vacant properties. The rents have dropped the demand has dropped, properties are vacant. The last thing landlords need is extra costs."	
"Perhaps make the fees dependent upon the price of the property or the price of the rental?!	

[26] Article 13(2) of the EU Services Directive (2006/123/EC)

Participants were unclear of the cost if you have a number of properties.	structure and decided to add a tiered fee for landlords applying for licences for multiple rented flats in the same building to reflect the reduced costs in administration. Where a building qualifies for a single selective licence (where there are multiple rented flats in the same block or building that are owned or managed by the same person), the Part A (administration) fee will be payable at the full rate for the first flat, but the Part A fee will be reduced by £75.00 in respect of the 2nd, 3rd etc. flats within the building. The Part B fee (enforcement) will be charged in full for all flats. As for landlords letting multiple properties in different locations across the borough, we are currently unable to offer a discount for such circumstances as the licence processing and enforcement costs incurred by us will remain the same. However, other discounts offered, will still be available for qualifying portfolio landlords. You can find out more information in our revised fee structure.
"One of our properties was converted into 4 flats and is a section 257 HMO. The fee for this is £1,050.00 discounted. The ground floor flat (3 bedroom) is a 254 HMO - a further £1,050.00 discounted. The additional licencing proposal would mean 3 more fees of £600.00 each so one property would in effect have 5 licences at an exorbitant cost of £3,900.00. Can't see the logic behind this"	
Theme 2.1.4: Should be free	
"Council should not get fees from landlords does council know how much landlords spends on house every year you should fill sorry for them you just trying to get money from landlords' pockets"	REJECTED: At Haringey, we always do our best to maximise our community impact with the limited resources available. However, due to the proactive nature of the inspection and enforcement regime required for a successful licensing scheme, we would be unable to bear the costs of a scheme. Fortunately, the legislation makes a provision for local authorities to charge a fee to cover the costs (but no more) of a scheme.
"If council wants it so badly for our safety it should be free of charge."	
"No fee should be charged to legal owners of their property, it is theft, stealing money from people who have worked very hard to acquire a property and provide a roof over their head to people."	
"The borough should be able to afford to ensure the housing is monitored and policed through its own resources. If you want better housing the scheme should be free and then you will get a	

high take up by landlords. If you charge, you will push the problem underground."	
"As a landlord, we have many expenses to deal with. I do not have the budget for additional fees. Instead, introduce an inspection and fine system for those who break the rules."	
Theme 2.1.5: Other	
"As far as I can see, the licensing fee shown covers part A - the application. There is no information about how the fees for part B would work. So you are asking approval for something not stated clearly."	CLARIFIED: As mentioned in response to Theme 2.1.2, for transparency and added clarity, we have reviewed and updated our fee structure and the explanatory text. This includes a breakdown of the fee charges including the part A and part B fee split.
Participants questioned how the fees were calculated and how many staff need to be employed to run the scheme/enforce it.	

Are there any discounts that should be removed?

Example comments from consultees	Council's consideration
Theme 2.2.1: No discounts should be given	
"Flat fee if this is introduced. No discounts."	REJECTED: Haringey are keen to utilise the unique opportunity licensing presents for us to work together with landlords to drive up standards in our PRS. The aim of the scheme is not to penalise landlords letting in the borough. Rather, it is about improving compliance by targeting those landlords who fail to accept their responsibilities and fostering good relationships with landlords that do. One of the ways we plan to achieve this is by offering an early application fee to compliant landlords and those who proactively engage with the scheme. Such incentives will be an important mechanism for acknowledging, rewarding, and incentivising greater compliance.
"All of them. There should be no discount for landlords in Haringey."	
"All discounts, with the cost of housing in the borough anyone who can afford to buy to rent can afford any fee they don't need to be discounted. They will pay the higher fee there is no need to lose the council money by offering discounts."	
"I don't see why there should be discounts. It should be based on costs to the authority."	
"I can't see any good reason to be giving Landlords discounts just because they're part of the NRLA."	

Theme 2.2.2: No early application discount should be given	
"I do not agree with the early bird discount. It makes no sense - the fee is to cover costs, so why does paying early give such a massive discount."	REJECTED: As mentioned above, we are keen to reward landlords who proactively engage with the scheme and see the early application fee as a means of doing so. Such landlords are likely to already be compliant with their statutory duties and therefore unlikely to require any future enforcement action.
"Early bird. This is too big a discount."	
"I cannot see what justifies an early bird discount."	
"No discount for early applications... Just standard fee to be paid... My Council Tax bill is not reduced due to me paying on time or even early."	
"No early bird rate. If they can afford to rent out property, they can afford the full fee."	
Theme 2.2.3: No discounts for bad landlords/properties in poor condition	
"Discounts should be removed for landlords who have a persistent record of non-compliance with council enforcement notices."	REJECTED: The 'discounts' offered are intended to incentivise and reward landlords who are likely to already be compliant or proactively engage with the scheme, such as those who are part of an accreditation scheme with a governing body or those who are a member of an organisation that provides education, advice, and training to landlords. Inevitably, there is a possibility that a few of these landlords may still be found responsible for substandard practices during their licence period. However, this would most likely be due to ignorance, rather than deliberate intent. In such cases, we will follow our standard procedure of setting a schedule of works for the landlord to remedy the issues identified and pursue enforcement action should they fail to comply. As for landlords who are deliberately flouting their responsibilities, we do not have the powers or resources to recall any discounts they may have qualified for and received on applying for a licence. However, we can, and will, use our enforcement powers, such as issuing fines and revoking licences, to penalise any persistent, non-compliant behaviour.
"Discounts should be removed for neglectful landlords"	
"If landlords do not comply and carry out their role as a landlord they should not qualify for the discount."	
"Discounts should be removed if the properties in poor and dilapidation state."	

Theme 2.2.4: Other	
"You have said become "accredited" but given no details of who the accrediting organisations are. You must give full disclosure to allow landlords to assess how easy accreditation is likely to be."	ACCEPTED: In light of the feedback received, we have added a list of accepted membership bodies and accreditation schemes[27] to our proposed fee structure.
NRLA questioned the discounts proposed and felt this was illegal (under Gaskin ruling), They felt there could be better ways to reduce the burden on landlords (like a monthly direct debit).	REJECTED/TO BE KEPT UNDER REVIEW: We have revised our fee structure to clearly reflect the licence fee split and any associated reductions, including explanatory text for greater transparency. As for offering phased payment plans for landlords, we agree that this could be a good way of reducing the possible burden on landlords and incentivising greater compliance. However, at this point in time, we fear that the financial implications of such payment plans would compromise the adequate resourcing of our proposed scheme, so we are unable to offer them. Should we seek to extend the scheme, we will review again our position to bear the financial impacts of phased payment plans such as the suggested monthly direct debits.

Are there additional discounts that could be considered?

Example comments from consultees	Council's consideration
Theme 2.3.1: Discounts based on tenants' reviews	
"If there was a way of doing it anonymously, I would support giving a small discount to landlords that are well rated by their tenants (and potentially neighbours?). It would be important to make sure that	REJECTED: We appreciate the sentiment behind this idea. However, review systems can be highly subjective, systematically biased, and easy

[27] Fee structure, section 5

landlords are not able to intimidate tenants into giving a higher score than deserved."	to manipulate. Implementing such a system would be resource intensive and require ongoing content monitoring and verification. Haringey believes that our resources would be better directed at the proactive inspection regime required to make selective licensing a success.
"Additional discount for 'good tenant reference' to reward good landlords"	
"Discounts based on positive feedback from tenants"	
Theme 2.3.2: Discounts for compliance during licence period	
"A discount for properties that continue to receive their license for several years - to incentives consistent good quality."	TO BE KEPT UNDER REVIEW: Haringey are keen to acknowledge, reward and incentivise compliance as much as possible, whilst ensuring that our scheme remains adequately resourced. In principle, we like the idea of rewarding proven and sustained compliance. However, as this is a new scheme, there is no previous, reliable, landlord performance data to introduce such a discount. Furthermore, we would like to concentrate our limited resources on targeting and identifying unlicensed premises. It would be too costly to implement a periodic inspection regime for every single licensable property in our designation area. If the scheme is renewed, there may then be an opportunity to consider such discounts based on the data from the previous scheme and standards set by the Council, as offered by some local authorities who have extended their schemes.
"If landlords have no issues or complaints over a year maybe they could get a discount the following year?"	
"If your property is checked and is habitable and meeting legislative requirements the landlord should get a reduction after a couple of years. This would encourage good landlords to actually register and maintain their registration"	
"If, after five years, there have been no complaints and no issues with the property a potential further discount"	
"Perhaps there should be an additional discount if they comply with an in-person property inspection halfway through the license term (after 2 1/2 years). A lot can go wrong with a property in 5 years."	
Theme 2.3.3: Discounts for good landlords	
"Discounts for good landlords who don't have any issues with their properties."	ACCEPTED: Our proposed discounts already focus on acknowledging and rewarding compliant landlords. Discounts will be available for those who proactively engage with the scheme, accredited landlords and those whose properties are energy efficient.
"Landlords and their properties that are already of a good standard should be entitled to a full or 90% discount!"	
"Discounts for recognized good landlords"	
"Discounts should be offered to good landlords."	
"Good landlords should not have to pay"	

Theme 2.3.4: Discounts for landlords with multiple properties	
"Discounts on multiple properties, perhaps if the fee is to be brought in it should be per landlord not per property."	ACCEPTED: As mentioned in response Theme 2.1.3, in light of the feedback received, we have reviewed our fee structure and decided to add a reduction for landlords applying for multiple licences for self-contained flats within the same building. More information can be found in our updated fee structure documents.
"Based on number of properties."	
"If a landlord owns multiple properties maybe there could be a discounted rate."	
"Some landlords have several flats in a property which would leave them with significant costs of the fees are legalised. If this idea is taken forward, the fees should be per building not per unit."	
Theme 2.3.5: Discounts for landlords who let to vulnerable and low-income tenants	
"Perhaps landlords that help to house vulnerable people that would normally struggle to find private accommodation could be offered a discount."	TO BE KEPT UNDER REVIEW: We recognise that Haringey is in need of more affordable, safe homes, especially for our most vulnerable residents. We also are aware of the widespread discrimination faced by people in receipt of benefits who are searching for a new home. In part, the proposed scheme hopes to help to tackle this issue by improving standards and compliance. However, there are currently no opportunities to offer a specific discount for those who let to vulnerable and low-income tenants.
"100% discount for renting to someone on state benefits e.g universal credit or housing benefit"	
"If planning to let as social housing via the council or a housing association."	
Theme 2.3.6: Discounts for landlords who are residents in the borough	
"Discounts for landlords who are Haringey residents and who chose to undergo the licensing requirements."	REJECTED: There is currently no evidence to suggest that landlords who live in Haringey are more compliant than those who live outside of the borough. All good landlords have an interest in keeping their properties in good condition. Therefore, we have decided against such a discount as it would be unfair and discriminatory.
"Private landlords living in the borough should be exempt"	
"Discounts for landlords resident in the borough."	
"Number of years owner has been a resident. Owner living in borough"	
Theme 2.3.7: For landlords who use accredited/reputable managing agents	
"Yes, landlords dealing through an ARLA or RICS member letting agent should receive a further discount"	CLARIFIED: We are already offering a £50 discount for landlords who are part of an accreditation scheme or reputable membership body. All

"Registered housing letting agent discount. To encourage renting out through good letting agents and to show tenants approved letting agent."	accepted professional memberships are listed in our updated fee structure.
"Accredited landlords should not be subject to a charge. You are encouraging landlords to sell up with this type of scheme. You should be working with accredited landlords and not against us."	
"Landlords with a specific accreditation could get a discount to reward them for being a good landlord"	
Theme 2.3.8: Other	
"Unemployed landlords with low income (that is that they don't get over 25K a year out of their rented property)"	REJECTED: As mentioned in response to Theme 1.2, to obtain a selective licence, landlords will need to pay a one-off fee of £600 for coverage across the five-year duration of the scheme. This equates to £2.30 per week and is not considered unaffordable in comparison to the average rental income in Haringey at present (£1500 per month[28]). On this basis, we do not anticipate the scheme causing landlords any hardship.
"Yes, for landlords already registered in other boroughs"	REJECTED: this would be very difficult for us to manage and monitor. Therefore, we have decided against introducing such a discount.
"Discounts for live in landlords?"	REJECTED: This scheme is aimed at properties privately rented to single households or two unrelated sharers. For this reason, it is unlikely that selective licensing would be applicable to most live in landlords. However, where landlords are letting multiple rooms within the same property, they may require an HMO licence.

[28] Median monthly private rent in Haringey, 12 month rolling period to Q2 2020-21

Views on proposed licence conditions

Section overview

The survey asked respondents to state the extent to which they agreed or disagreed with the aims of the proposed conditions. Respondents were then asked if they had any specific comments about the proposed licence conditions or any suggestions for alternative or additional conditions.

The most common response was to **generally disagree** with the scheme/conditions as a whole (25% of comments). This was followed by 50 respondents who felt that the conditions were **appropriate, reasonable, and would have a positive effect** (16%).

In this section, we have responded to the specific questions received and suggestions by theme.

Relevant survey question:

S8Q1: To what extent do you agree or disagree with the draft licence conditions to regulate the quality of neighbourhood, property safety & standards and management standards? Do you have any specific comments about the proposed draft conditions, or any suggestions for alternative or additional conditions?

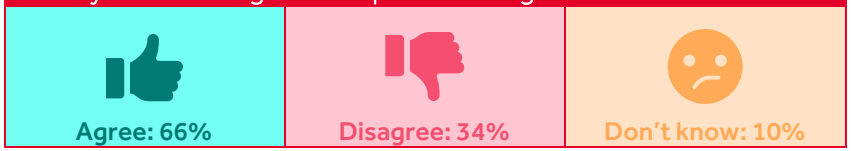
Survey results at a glance[29]: improve quality of neighbourhood



Survey results at a glance[30]: improve property safety & standards



Survey results at a glance: improve management standards



[29] Results shown do not add up to 100% due to rounding
[30] Results shown do not add up to 100% due to rounding

Specific comments about the proposed draft conditions

Example comments from consultees	Council's consideration
Theme 3.1: Quarterly statements	
"If tenant pays rent via bank it isn't necessary to provide them with quarterly statements that is just more work for no solid reason. Should proof of payment be requested at any time it could be produced."	ACCEPTED: In light of the feedback received, we have removed this licence condition as we accept most rental payments are now made electronically. However, as good practice, we would still recommend that licence holders keep an audit trail of their rental income.
Theme 3.2: Reference letters	
"I am concerned by the requirement for landlords to obtain references verifying tenants' 'good character'. From what I can see, this goes further than other comparable selective licensing schemes and I worry that it could be a barrier to obtaining housing for those with few connections or without a history of renting (e.g. homeless, students, first time renters, new to the UK). It can already be very hard to obtain private rented accommodation in the borough. From what I can see, other councils either don't have a character requirement or frame it in looser terms. Bexley Council has a specific provision for those unable to obtain references. "	REJECTED: Whilst we appreciate the concerns raised in relation to reference letters, we are unable to remove this requirement as it is a mandatory condition by law[31]. However, we have reworded the licence condition to make it less restrictive and onerous for landlords.
"I think it is important to make sure that vulnerable people such as those with addiction issues or mental health problems who may have previously been accused of antisocial behaviour are not discriminated against in the housing market. I am concerned that the references section of the proposal may force such people into homelessness, and that there must be provision for them to appeal, and access support services if necessary."	
Theme 3.3: Timeframes for dealing with issues raised by tenants	
"Under "Freedom from Disrepair", I think there needs to be a section that details the obligations of the landlord for carrying out repairs on	REJECTED: Legally, we are not permitted to include conditions on the licence relating directly to property conditions, despite that often being

[31] Housing Act 2004, Schedule 4

issues that compromise basic health & safety. "Reasonable time period" is not specific enough"	one of the key reasons for designation. However, under the management section of the conditions, we've included several conditions which relate to good property management. Provision for dealing with housing disrepair is provided within the Housing Act 2004. We have also included a clause in the introduction to clearly state our expectations of landlords when responding to the Council's requests: '*Any correspondence, letters and records referred to in these conditions must be provided by the Licence Holder to the Authority within 21 days on demand unless an officer of the Council requests this document within alternative reasonable timeframe in line with any investigation.'*
"The proposals should define set time periods for responding to and dealing with grades of disrepair and defects, rather than the rather vague 'reasonable time period' used in para 2 of Property Management >> Freedom of disrepair."	
Theme 3.4: Requirement for a 24-hour emergency contact number	
"Some of the conditions e.g. A 24-hour emergency contact telephone, number which should include out of hours response arrangement, are not viable for a small landlord"	REJECTED: It is imperative that tenants and the Council are able to contact the licence holder in the event of an emergency (such as a gas leak).
Theme 3.5: Pest control	
"Pest control. Are landlords always responsible? What if the tenants live in a way that attracts vermin - food debris left in gardens etc? Is it our job to pop round to clear it all up?"	PARTIALLY ACCEPTED: We recognise that tenants' lifestyle choices may be a contributing factor to a pest infestation. We have removed the specific condition relating to pest control and replaced it with a generic condition under property management to make the conditions less onerous. However, landlords are still legally responsible[32] for ensuring that their properties are pest free in order to prevent any issue to local residents and/ or public health problems.
Theme 3,6: Maintenance of outdoor spaces	
"I don't think it is reasonable to expect the licence holder to maintain gardens. It would generally be too intrusive for the landlord to visit -	REJECTED: We recognise that tenants may be responsible within their tenancy agreement for maintaining gardens. However, it is still the legal

[32] The Prevention of Damage by Pests Act 1949, section 4

or arrange a gardener to visit - the property to maintain the rear garden in particular. I also think that in order to promote the concept of a cohesive community it is important that the tenant takes some level of responsibility and gets involved."	responsibility of a landlord to keep the structure of their property in good repair (including its exterior) [33] and ensure that their tenants undertake any agreed maintenance responsibilities.

Any suggestions for alternative or additional conditions

Example comments from consultees	Council's consideration
Theme 3.7: Disrepair should be included	
"The proposed division of responsibilities is unclear. Why would the scheme not cover all disrepair issues in a property? Does not any disrepair relate to the management of a property. Is there a risk, too, that some issues may fall between two stools?"	REJECTED: Legally, we are not permitted to include licence conditions directly related to property conditions, despite them often being one of the key reasons for a designation. Under the management section of the conditions, we've included several conditions which relate to good property management.
"I believe this license should also cover matters relating to disrepair, if these were being managed correctly by the council currently there wouldn't be so many issues"	
Theme 3.8: Protection for landlords against falsified complaints	
"Some of the complaints could be falsified by the tenant to out the landlord. There is no provision for lying or bullying."	REJECTED Our officers must remain impartial when investigating any complaint made whether that be by a landlord or tenant. Officers will gather evidence before making any judgement and interested parties will have the right to appeal any formal decision made.
Theme 3.9: Property security	
"A condition relating to installing burglary proof locks on front doors i.e. a requirement that landlord fit a sufficiently secure lock like a deadlock. I have been burgled in a private rented property because the lock was so easy to pick. Landlords should have to ensure the exterior of their property is sufficiently secure."	REJECTED To avoid making our licence conditions too onerous, we have decided against including the proposed condition. However, as part of our campaign to raise landlords' awareness of their responsibilities, we will be sure to include guidance on property security that reiterates their legal obligations.

[33] Landlord and Tenant Act 1985, Section 11

Theme 3.10: Letting/managing agent responsibilities	
"Letting agents contribute to problems with housing standards. They are slow to get repairs done, and slow to return deposits. People also worry that letting agents will think badly of them if repairs need to be carried out. Often, they are not willing to attend for items such as a boiler failure out of hours (e.g. Christmas/Bank Holidays) unless there are children/elderly present. This just simply would not be the case in your own home."	CLARIFIED: Our proposed selective licensing scheme is aimed at both landlords and letting agents. The licence holder has to be someone who has the capacity to take responsibility for the property and ensure the licence conditions are complied with, including those related to property management.
Theme 3.11: Freeholder responsibilities	
"The problem for myself and other leaseholder landlords is the responsibilities that are in part or completely the responsibility of the freeholder. Some freeholders are very unresponsive."	CLARIFIED: Under the proposed selective licensing scheme, if there was an issue with the property that required formal action, we would inform all interested parties (including property freeholders). However, ultimate responsibility for the issue would still lie with the property owner.
Theme 3.12: Tenant responsibilities	
"There is too much weighted solely against the license holder. A tenant has certain responsibility to maintain the property and grounds in such order that the license holder can meet the terms of the conditions. This should be recognised in the conditions. For example if the tenant does not keep the garden clear then any potential pest infestation cannot be the sole responsibility of the license holder."	REJECTED: Whilst we acknowledge tenants' responsibilities, landlords are still responsible for the overall management of their properties. As part of our awareness campaign to help landlords better understand their rights and responsibilities, we will include tips to aide dealing with difficult tenants. In parallel to this, we will seek to run a similar awareness campaign for tenants to ensure they are also aware of their rights and responsibilities.
Theme 3.13: Rent controls	
"I think there is a missed opportunity to address landlords driving up rent each year, which is in turn, driving up inequality in the borough. This could be achieved through rent control."	REJECTED: The law does not make any provision for local authorities to establish or enforce rent controls through selective licensing schemes.
"We would like to see some form of rent control to prevent landlords from overcharging rent."	

Theme 3.14: Landlords to notify tenants of anticipated visits	
"Landlords should ensure 24hours notice is given of any proposed visits and/or works before carrying them out, and to ensure tenants are not harassed by Landlord reps if things are reported"	ACCEPTED: There is already a legal requirement for landlords to give tenants 24 hours' notice prior to any proposed visits[34]. As for preventing harassment, selective licensing will provide tenants with greater protection from retaliatory 'no fault' evictions, as we will be no longer be required to give landlords 24 hours' notice prior to an inspection. This should encourage more people to report any difficulties they are facing without fear of retribution.
Theme 3.15: Tackling climate change	
"I would like to see additional conditions to tackle climate change: 1. A mandated minimum energy efficiency of the properties to be set (e.g. A or higher): most of the housing is old and energy inefficient. Any savings in heating will benefit the renters too via reduced bills and lower air pollution; 2. Where properties have space in front gardens, mandate for cycling storage to installed - this will encourage people to cycle."	ACCEPTED: At Haringey, we are committed to making the borough a healthier, active and greener place[35]. An Energy Performance Certification (EPC) of E and above is already a prerequisite of the licensing process. However, in conjunction with our affordable warmth strategy, we have decided to go a step further to help tackle fuel poverty in our PRS. An incentive of £50 reduction has been created for landlords applying for a licence whose properties have an EPC rating of C and above. This will act as an incentive for landlords to improve the energy performance of their properties and reduce any likelihood of future enforcement action due to non-compliance. We will also be providing support to non-compliant landlords (those with an EPC rating of F and below) to become compliant by signposting them to grant schemes to fund remedial works and providing them with access to specialist information (via Ecofurb[36]) on how to improve the energy efficiency of their properties. Should a landlord choose to remain non-compliant, enforcement action will be taken.
"The NRLA felt energy efficiency would need to be built in at some point, as this is coming round the corner."	

[34] Landlord and Tenant Act 1985, Section 11
[35] Priority 3: Place - Outcome 9, Borough Plan 2019-23
[36] An end-to-end low carbon renovation service.

	In addition, we will be including information on how to improve the energy efficiency of properties in our awareness campaign for landlords to help promote best practice (including printed guides and public workshops). We will continue to review how we can leverage the powers afforded us by licensing to help to make the borough greener place.
Theme 3.16: Benchmarking conditions against other Local Authorities' schemes	
"Have you looked at any similar schemes in other parts of London? If there are schemes that have been running for years, Haringey should learn from these areas."	ACCEPTED: Yes, we have been liaising with industry specialists to develop and refine our proposal. We have also benchmarked our proposed licence conditions and fee structures against existing schemes in other London boroughs (including Enfield, Hackney, Waltham Forest and Islington).

Other views and suggestions on the proposed scheme

Section overview	Relevant survey question:
At the end of the survey, respondents were given the chance to provide any other comments on the proposals, suggest alternative ways of dealing with problems in the areas and to share ideas for improving the proposed scheme. The most common response was that it was vital to **regularly monitor the scheme and have checks in place to enforce the scheme** (16% of comments), This section considers the suggestions for alternatives and improvement received.	S9Q1: Do you have any further comments about the Selective Licensing proposals? Please include any suggestions for alternative ways of dealing with problems in the area or any ideas for improving the proposed scheme.

Example comments from consultees	Council's consideration
Theme 4.1: It needs regular monitoring / checks to enforce conditions	
"Ensure that there is another resource to implement and deal with the landlords who fail to improve the conditions for their tenants."	ACCEPTED: Due diligence checks to ensure compliance with licence conditions and legal requirements will be an integral part of the scheme, reactive inspections will then be scheduled by priority based on a risk assessment. We will also be conducting proactive inspections to tackle non-compliance in the proposed designation area. See response to Theme 1.14. We aim to inspect at least half of licensable properties by the end of the scheme. Landlords who fail to comply, may have enforcement action taken against them. As previously mentioned, the anticipated staffing costs to deliver our proposed enforcement regime have been factored into our proposed fee structure. See response to Theme 2.1.2.
"It would only be worthwhile if it is enforced. There are too many schemes that come into play and are impossible to regulate. There are so many dodgy landlords and far too many illegally rented properties that the council don't know about and/or do anything about."	

The NRLA didn't feel that Haringey can deliver the scheme because there were not enough resources to do this properly as an inspection-led regime. They also felt that evidence from the other schemes was that Haringey don't do the inspections.	REJECTED: As shared in response to Theme 1.3, we have had demonstrable success at driving-up standards through our previous property licensing schemes for Houses in Multiple Occupation (HMOs). In previous Haringey additional HMO licensing schemes all properties have been inspected prior to licences being issued. The current borough-wide HMO licensing scheme will also have all licensed properties inspected within its lifetime.
Citizens Advice felt that there is not a significant amount of evidence that Haringey uses enforcement powers enough, and that a licensing scheme needs to be part of an approach, not a panacea itself. They also felt that it would be useful for the Council to set out its enforcement strategy, as they have a lot of discretion about whether they are going to take more informal or formal measures. Also setting targets on no of inspections etc would be useful.	REJECTED: Haringey's overarching community safety & enforcement policy and private sector housing enforcement policy both clearly set out the Council's objectives in terms of dealing with non -compliance. Our Private Sector Housing team are committed to taking formal action, when necessary, to deal with non-compliant landlords through the powers available to them, including selective licensing.
Cambridge House – Safer Renting who deal with private rented tenants felt that having a proactive approach to enforcement is vital from an equality perspective. Many minority ethnic groups are not being reached via a reactive enforcement approach, so this will improve if a proactive approach is taken. They also felt that there should be an inspection of all properties before granting a licence.	ACCEPTED: We are aware of the limitations of our existing enforcement powers and plan to utilise the proactive enforcement approach that is made possible through licensing to reach those experiencing poor property conditions in the diverse communities we serve. We also intend to partner will local community organisations to help us to engage with ethnic minority groups and promote tenants' rights and responsibilities
Theme 4.2: Need a system for reporting issues	
"A simple online tool to report problems within your area"	ACCEPTED: We acknowledge the importance of an accessible, user friendly system for reporting issues. As with our current HMO licensing scheme, tenants and/or members of the public will be able to report issues via a dedicated council webpage. We are also aspiring to build and integrate a 'report it' function for PRS housing issues into the Council's mobile application.
"You could have a hotline for tenants/members of the public to use to report the kind of behaviour this consultation seeks to address.."	
"I think there should be a procedure for tenants to make complains about their landlord to the licencing system, and that tenants should be made aware of it."	

Theme 4.3: Council should get its own properties and tenants in order	
"The private sector rentals are in far better shape than a council property. Maybe clean up your own properties before you look at private rentals."	REJECTED: Our 2019-2023 Borough Plan, seeks to drive up the quality of housing for everyone no matter their tenure. Initiatives to improve social housing include but are not limited to: • improving the quality of Haringey's council housing, including ensuring that a minimum of 95% of homes meet the Decent Homes Standard by 2022 • improving residents 'satisfaction with the service they receive from Homes for Haringey to be in the top quartile for London (78%) by 2022 • securing the delivery of supported housing that meets the needs of older, disabled and vulnerable people in the borough However, it is important to note that social housing is a separate policy area and that many households who would have traditionally rented council homes are now renting privately. Selective licensing is an integral component of our strategy to drive up standards in the PRS by tackling the prevalence of poor property conditions and deprivation.
"Landlords who rent out sub-standard properties are rare, in fact council managed properties are far more neglecting than those in the private rental sector"	
"LBH are seeking to deflect from the problems in the socially rented sector for which they have much more direct responsibility. P10 of the state of the borough report shows that the real story is the collapse of the social housing sector and the high rates of dissatisfaction within it. Between 2015 and 2018 the number of social tenants fell from 81k to 55k while PSR only increased by 17k"	
Theme 4.4: Need more Council housing	
"Build more social housing"	ACCEPTED: Haringey agrees that increasing the supply of traditional council housing is one of the most important things we can do, we have promised to deliver at least a thousand new council homes by the end of this year[37]. As noted above, it is important to tackle the issues faced across all housing tenures in tandem to ensure the best outcomes for all Haringey residents.
"More social housing is needed at fair rents."	
"You have to build affordable homes"	

[37] Priority 1: Housing - Outcome 1, Borough Plan 2019-23

Theme 4.5: More partnership working between Council & landlords /support from Council for landlords	
"Have a better communication system between the authorities and landlords and improve legislation for both tenants but more specifically landlords."	ACCEPTED: At Haringey, we have a strong history of working closely and facilitating open, two-way communication with landlords and managing agents through our landlord forum. Unfortunately, due to the pandemic, our landlord forum was temporarily suspended. We will be relaunching the forum in the coming months and inviting landlords to join. Membership will include a subscription to our quarterly newsletter, networking opportunities and ongoing training and support. We are also redesigning our webpages to make them easier for landlords to navigate and perform their top tasks. More broadly, as part of the supporting communication and engagement plan for the scheme, will be running a borough wide awareness campaign to help landlords understand their rights and responsibilities and provide them with resources to make it easier for them to execute their duties. Where possible and no conflict of interest is present, we will also support both landlords and tenants with advocating their needs, however, do not have the jurisdiction to create, alter or repeal legislation.
"Support should be given to landlords as this would improve the investment in the area and more properties could be available to the renters."	
Citizens Advice felt strongly that there needs to be a better dialogue with local landlords for schemes to work.	
Haringey Council's ASB and Enforcement team felt that the impact could be great if they can work directly with landlords as soon as issues are identified. There needs to be a collaborative approach, rather than a dictatorial approach to get things improved. Enforcement should only happen as a very last resort.	
Theme 4.6: Providing more support to landlords to deal with ASB	
"As this landlord license concept is concerned mainly with problem tenants and the issues they cause in neighbourhoods ('management' rather than 'property maintenance'- since property maintenance/ safety is already legislated by building regs etc) and the ability of landlords to keep the problem of ASB tenants under control, I would suggest the best way to support landlords in this is to make it easy for them to evict antisocial tenants."	CLARIFIED: Haringey appreciates the difficulties that landlords may face when dealing with problem tenants and breaches to tenancy agreements. Whilst we do not support the use of 'no fault' evictions[38], we do offer support to landlords who are experiencing severe difficulties with their tenants. Such landlords are able to seek advice from the Private Sector Housing team and a future provision for seeking assistance will be provided through the Landlord Forum.

[38] Housing Act 1998, Section 21

"Having Landlord meetings to discuss the issue. Landlords should have the power to evict quicker."	
Theme 4.7: Have a registration scheme for landlords	
"There is already legislation to deal with rogue landlords and anti-social behaviour. Most private landlords provide a decent service, and they are being penalised and scapegoated for the issues in the area which are actually down to poor funding and lack of criminal enforcement by the police/Council. It would be better to have a register of rogue landlords or licence landlords, rather than asking all landlords to have to pay a fee to have each property licensed."	PARTIALLY ACCEPTED: Selective licensing includes a legal requirement of creating a public register of licensed premises. This is beneficial for both landlords and tenants alike - landlords can advertise they are licensed with the local council and tenants can check the register to see if their landlord is licenced. It is also a useful tool for members of the public to check if a property is licenced prior to raising any issues. The effectiveness of public registers under selective licensing is underpinned by mandatory enrolment, robust compliance checks and the risk of enforcement action for failure to comply. Sadly, a stand-alone register would not offer the same level of assurances or tackle those landlords who do not volunteer to sign-up.
"The way to deal with this would be to maintain a register of landlords, and police perfectly good existing legislation in those areas where issues exist"	
"Tenants should be able to search the property in question to view the reports made. They should also be able to search the landlord. This would allow tenants to go into view a property with open eyes. It would also allow good landlords and properties to get an edge on the market and advertise their compliance. Tenants should be able to do this for all properties in the borough, so they can do it before viewing and contracting.!	
Theme 4.8: Other	
"Is there any reason why the licensing cannot be for a longer period?"	CLARIFIED: By law[39], we can only designate an area to be subject to selective licensing for a maximum of five years. Where there is a clear and demonstrable case for the renewal of a scheme, we will need to repeat the full process required for designation before the expiry of the first five years, including a public consultation and seeking approval from the relevant authorising bodies for the size and scale of the designation.
Citizens Advice were concerned that there could be a negative impact, or perceived negative impact within some communities around insecure immigration status if licensing is seen	ACCEPTED: We are keen to do what we can to maximise engagement with those communities most in need, including building and retaining

[39] Housing Act 2004, Section 80

as a tool for immigration to use. This could mean very vulnerable groups that the scheme needs to help may be more reluctant to engage.	their trust so that they feel safe to raise any problems they are experiencing. We will therefore seek to avoid joint visits with border authorities, unless we are legally required to do so. We have been very clear in our scheme objectives that the purpose of the proposed scheme is to help to tackle deprivation and drive-up property standards and we intend to honour this.
Citizens Advice also felt that there needs to be much greater communications and publicity going out to tenants, as most seemed to be unaware of their rights.	ACCEPTED: As part of our scheme objectives, we will be working in partnership with agencies and services who support tenants to help raise awareness of their rights and responsibilities.

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London Borough Haringey.

Selective Property Licensing

Appendix 5

Selective Licensing Conditions

London Borough of Haringey
Proposed Conditions of a Selective Licence

The conditions below are attached to every Selective Licence issued by the London Borough of Haringey.

Any correspondence, letters and records referred to in these conditions must be provided by the Licence Holder to the Authority within 21 days on demand unless an officer of the Council requests this document within alternative reasonable timeframe in line with any investigation.

It is the licence holder's responsibility to ensure that the licensed property complies with all the conditions set out below. Failure to do so may lead to prosecution or Civil Penalty for a breach of the licence conditions, a loss of the licence and imposed fines of up to £30,000

If the licence holder is not the manager of the property, it is their responsibility to ensure that the manager complies with all the conditions of the licence.

*** The Council is obliged to impose these conditions under Schedule 4 of the Housing Act 2004**

Condition Item 1.	Tenancy Management	Condition
1.1	The licence holder shall supply to the occupiers of the house a written statement of the terms on which they occupy it. – Commonly known as a tenancy / licence agreement. The licence holder must. • Keep copies of all such tenancy agreements for the duration of the licence (including any renewal) and supply copies to the Council if requested to do so.	*
1.2	The licence holder shall obtain references from persons who wish to occupy the house before entering into any tenancy, licence or other agreement with them to occupy the accommodation.	*
1.4	In line with legal requirements, the licence holder must protect any deposits taken from the occupiers by placing them in a statutory tenancy deposit scheme. The licence holder must ensure compliance with the requirements of the tenancy deposit scheme as set out at Part 6 Chapter 4 and Schedule 10 of the Housing Act 2004. The tenant must be given the prescribed information about the scheme being used at the time the deposit is taken. This information must be provided to the Council if requested.	
1.5	The licence holder must provide to the tenant/occupier at the start of their tenancy, whether in the tenancy agreement or licence granted or otherwise; • 'How to Rent Guide' • An up to date gas safety certificate to any tenant at the beginning of their tenancy and on an annual basis thereafter • A copy of the licence to which these conditions relate at the start of their tenancy • An emergency contact number for the licence holder or manager of the property. • A copy of the current valid Electrical Safety Certificate • A copy of the Energy Performance Certificate (EPC), • Details of waste collection and recycling arrangements for the property. **https://www.haringey.gov.uk/environment-and-waste/refuse-and-recycling/bin-collections/collection-days** **https://www.haringey.gov.uk/environment-and-waste/refuse-and-recycling/which-bin-to-use**	

Condition Item 2.	Property Management	
2.1	The licence holder must ensure that: • All occupants of the property at the beginning of each tenancy agreement are given details about how to report repair issues and how these will be dealt with. • Regular inspections of the property are carried out to identify any problems relating to the condition and management of the property. This must include evidence of checks that the property is being occupied by a single household. • Any minor disrepair, defects or pest related issues identified to the landlord by either the tenant or the council must be investigated and adequately addressed within a reasonable time period. • All repairs to the property or any installations, facilities, or equipment within it are carried out by competent and reputable persons. • Precautions must be taken when any work is carried out to ensure the safety to all persons occupying or visiting the premises. • On completion of any works, the property is left in a clean and tidy condition.	
2.2	The licence holder shall take reasonable and practicable steps to prevent or address any issues that arise from the conduct of the occupiers and or visitors of the property which may affect the building and those living within the locality.	
2.3	Any property with gas installation pipework, gas fittings or a gas boiler installed less than 12 months ago must produce to the Council annually for its inspection a gas safety certificate obtained from a Gas Safe Registered Engineer, in respect of the property within the last 12 months.	*
2.4	The licence holder shall ensure that the electrical installation, all electrical appliances and all portable electrical appliances made available by him or her in the property are in a safe condition and to supply to the Council, if requested, a declaration by him or her as to the safety of such appliances.	*

2.5	The licence holder must ensure that all furniture provided, by the landlord are kept in a safe condition. The licence holder must ensure that any upholstered furniture provided, whether new or second-hand, complies with the Furniture and Furnishings (Fire) (Safety) Regulations 1988, as amended.	*
2.6	The licence holder must ensure that smoke alarms are installed on each storey of the premises on which there is a room used wholly or partly as living accommodation (Includes bathrooms and lavatories). The licence holder must ensure checks are made to ensure that each prescribed alarm is in proper working order on the day the tenancy begins if it is a new tenancy and that regular checks are made thereafter. All alarms must be kept in proper working order at all times. https://www.gov.uk/government/publications/smoke-and-carbon-monoxide-alarms-explanatory-booklet-for-landlords	*
2.7	The licence holder must ensure that a carbon monoxide alarm is installed in any room ("room" includes halls and landings; and bathrooms and lavatories) in the house which is used wholly or partly as living accommodation and contains a solid fuel burning combustion appliance; and to keep each such alarm in proper working order. https://www.gov.uk/government/publications/smoke-and-carbon-monoxide-alarms-explanatory-booklet-for-landlords	*
2.8	Licence holders must: • Provide a sufficient number of external rubbish bins for the occupiers to dispose of waste as prescribed by the Council • Ensure that all tenants know when their waste and recycling collections are and that they put their waste out for collection on the correct day. **https://www.haringey.gov.uk/environment-and-waste/refuse-and-recycling/bin-collections/collection-days** • Ensure that tenants know how to place waste and recycling out for collection. • Ensure that tenants use the correct type of waste and recycling containers as detailed in the service guide. **https://www.haringey.gov.uk/environment-and-waste/refuse-and-recycling/which-bin-to-use** • It is the licence holder's responsibility to ensure that, at the end of the tenancy, all bulky waste is disposed of properly and legally. Bulky Items such as mattresses, white goods	

	and furniture should be disposed of either through the Bulky/Special Collections service or at your local Reuse and Recycling Centre. **https://www.haringey.gov.uk/environment-and-waste/refuse-and-recycling/bulky-waste**	
2.9	If the Licence Holder becomes aware that the occupiers of the house or their visitors are not using the waste disposal facilities provided and/or leaving waste outside the house or in its vicinity (for example old furniture, mattresses), they must ensure that a warning letter is sent to the occupiers advising them to remove the items immediately.	
2.10	The licence holder shall ensure that any exterior area of the property such as gardens, yards within the boundary of the property is maintained and kept in a reasonable state and remains free of any pest infestation.	

General

	Notifications.- Housing Act 2004 section 66 Tests for fitness etc. and satisfactory management arrangements.	
	The licence holder must inform the Council of: Details of any unspent convictions not previously disclosed to the Local Authority involving fraud or dishonesty, violence or drugs, any offence listed in Schedule 3 to the Sexual Offences Act 2003, or any other conviction relevant to the licence holder and/or the property managers fit and proper person status. Details of any finding by a court or tribunal against the licence holder and/or the manager that they have practiced unlawful discrimination on the grounds of sex, colour, race, ethnic, national origin, disability or the other protected characteristics cited within the Equalities Act 2010. https://www.gov.uk/guidance/equality-act-2010-guidance Details of any civil or criminal proceedings against the licence holder or manager, relating to housing, public health, environmental health or landlord and tenant law, resulting in a judgment or finding being made against them.	* * *

	Information about any property the licence holder or manager owns or manages or has owned or managed, that has been refused a licence by a local housing authority or has had a licence revoked due to breach of the licence conditions. Information about any property the licence holder or manager owns or manages or has owned or managed, that has been the subject of an interim or final management order under the Housing Act 2004. The property becoming empty for more than 3 months. Notification of repossession/foreclosure. Successful claims against the licence holder for default of tenancy deposits. A change in managing agent or the instruction of a managing agent. The undertaking of substantial works to the property, including conversions and modernisations or emergency problems relating to fire, flood or disaster.	* * * * * * *
	Absence	
	The licence holder is required to have in place suitable emergency management arrangements in the event of their absence.	

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London Borough Haringey. Selective Property Licensing

Appendix 6

Fee structure for Licence Applications.

Licence Fee, Income and Expenditure for Selective Property Licensing.

1. Licensing Fee Structure

Article 13(2) of the EU Services Directive (2006/123/EC) requires that the licence fee paid by the applicant must be reasonable and proportionate to the cost of the authorisation (licensing) procedure and shall not exceed the cost of the authorisation (licensing) procedure. This means that the costs of the proposed licensing schemes must be cost neutral whereby the total licensing fee income does not exceed the expenditure over the five-year duration of the scheme. The licence fees for licence applications were set taking into account all of the Council's costs in administering and carrying out its licensing functions. The proposed fees are underpinned by assumptions about the level of income the fees will generate, based upon the number of properties that we expect to be licensed during the life of the schemes.

2. Licence fees

The fee is levied in two parts.
Part A of the fee is for the application for a licence and covers the costs of processing, administration and validation of the application. Part B of the fee comprises the running costs of the scheme and exercising our other licensing functions, such as the inspections and Compliance.

Payment of Part A of the fee must be received when the application is made to the Council and, if the licence application is granted, Part B of the fee must be received and cleared before a licence is issued. If the Part B payment remains unpaid then the property will be considered as unlicensed. In the event that we decide to refuse a licence application, only the Part A fee will have been paid. (Table 1 below)

The fees will be reviewed throughout the scheme and the Council may adjust the fees to reflect changes in costs.

Licences are not transferable. If a person wants to become the new licence holder for a property, they must apply for a new licence and pay a new licence fee. (Table 3 below)

3. Licence Duration.

Licences will be granted for the duration of the scheme (up to five years) unless we have concerns about the management, use, condition or occupation of the property, in which case we may grant a licence for a shorter period and a new application and fee will have to be paid on its expiry. If we revoke a licence and the property continues to be rented out, a new application will have to be made and a new licence fee paid.

4. Early Application Fee

Applicants who apply before the designation becomes operational will only pay the Part 'A' Fee for their licence. (Table 2 below)

5. **Accredited Landlords**

If you are an **accredited licence holder** under one of the following schemes, you may be entitled to a £50 discount: (see table 2 below)

(Please note discounts will not be applicable to early applications)

- London Landlord Accreditation Scheme (LLAS)
- National Residential Landlords Association (NRLA)
- UK Association of Letting Agents (UKALA)

If you are a **member** of one of the following organisations, you may be entitled to a £50 discount:

(Please note discounts will not be applicable to early applications)

- Association of Residential Letting Agents (ARLA)
- Royal Institution of Chartered Surveyors (RICS)
- Safeagent

Please Note: This list of accepted schemes and organisations will be kept under review during the life of the scheme.

6. **Property EPC rating of C or above**

If your property has an EPC rating of C or above, you may be entitled to a £50 discount. (Table 2 below)

7. **Buildings Containing Self-Contained Flats that are not Flats in Multiple Occupation.**

Where a building qualifies for a single selective licence (where there are multiple rented flats in the same block or building and are owned or managed by the same person), the Part A fee will be payable at the full rate for the first flat, but the Part A fee will be reduced by £75.00 in respect of the 2nd, 3rd etc. flats within the building. The Part B fee is the full fee for all flats. *Accredited Landlord and EPC discounts will be applicable to all remaining flats.

8. **Fees Discounts and Charges Table.**

Table 1. Fee structure

Fee Type	Part A (application fee)	Part B	Total Fee
Full Selective Licensing Fee	£350.00	£250.00	£600.00
Early Application Fee	£350.00	_	£350.00

Table 2 – Discounts

Discount Type	Discount (£)	Deducted from Part A/B	Total fee
Accredited Licence holder	£50.00	Part B Payment	£550
Compliant EPC	£50.00	Part B Payment	£550
Accredited licence holder + compliant EPC	£100.00	Part B Payment	£500

- NB. A discount will not be applicable to any early applications made

Table 3 - Other Fees and Charges.

Variation	**Outcome**
Application refused by the council	No refund of Licence Fee
Application withdrawn by applicant	Part A Licence Fee not refunded
Revocation of Licence	No refund of Licence Fee
Application following revocation of a licence	Full Application Fee
Application to licence following revocation of licence	Full Application Fee
Application withdrawn by the applicant Part A	No refund of Licence Fee
Variation to the licence in terms of change of address, interested parties, management details.	No Fee
Change of licence holder	New Licence Application Fee
Property that cease to be rented during lifetime of scheme	No refund of Licence Fee
Paper applications Part A	£100 Additional Charge.

9. Summary of Predicted Income and Expenditure

The table below shows the estimated total income and expenditure for the scheme over the 5 year duration.

Some assumptions have been made in estimating the income which include the predicted number of properties to be licensed within the designation. The percentage of take up within the 5 year period of the scheme and the number of early applications that will be made by landlords who wish to apply before the operational date who will pay a lower fee for their licence application.

Selective Licensing Designation	**INCOME** **(Licence fees)**	**EXPENDITURE** **(Operational costs)**

(estimated number of properties to be licensed)		
19,442	**£10,050,950**	**£10,050,950**

10. Summary of Expenditure.

The table below shows the estimated total expenditure for the scheme over the 5 year duration.

Expenditure Cost Elements	**Cost (£)**
Staffing (employee costs)	**£7,010,868.00**
Overheads and management costs	**£2,258,272.00**
Staffing Expenses (indirect employee costs)	**£155,751.00**
IT & Project	**£266,990.00**
Legal Costs	**£125,219.00**
Communications	**£65,000.00**
Postal, Land Search & Translation costs	**£168,850.00**
Total	**£10,050,950**

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London Borough Haringey. Selective Property Licensing

Appendix 7

Equalities Impact Assessment

Equality Impact Assessment (EQIA)

The Equality Impact Assessment (EQIA) form is a template for analysing a policy or proposed decision for its potential effects on residents with protected characteristics covered by the Equality Act 2010.

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 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.

Although it is not enforced in legislation as a protected characteristic, Haringey Council recognises the profound and far-reaching impacts of socioeconomic disadvantage treats socioeconomic status as a local protected characteristic.

1. Responsibility for the Equality Impact Assessment

Name of proposal:	**Proposal to introduce Selective Property Licensing**
Service Area:	**Environment & Neighbourhoods**
Officer Completing Assessment:	**Lynn Sellar**
Equalities/HR Advisor:	**Edward Ashcroft**
Cabinet meeting date (if applicable):	**22 Feb 2021**
Director/Assistant Director	**Stephen McDonnell**

2. Executive summary

Background

In addition to our normal enforcement powers, Part 3 of the Housing Act 2004 gives Local Authorities the power to designate an area or areas within its district as being subject to selective licensing to target specific issues that are affecting the local authority and its community. Selective licensing is a discretionary licensing tool which can assist a Local Authority in regulating the private letting of houses where there are concerns of at least one of the following issues: anti-social behaviour, low housing demand, poor property conditions, high crime, high levels of deprivation or high migration.

In Haringey, we have seen a significant increase in the size of our Private Rented Sector (PRS) with recent data modelling estimating that the borough has just under 44,000 privately rented dwellings. Alongside this growth, we have found evidence of an increase in the prevalence of poor property conditions and deprivation in areas containing high concentrations of privately rented properties as detailed in Appendix 1.

Proposal

The Council is seeking approval to introduce a selective property licensing scheme for property that is rented to single family households or two unrelated sharers. The scheme designation will include all 12 wards within the East of the borough: Bounds Green, Bruce Grove, Harringay, Noel Park, Northumberland Park, Tottenham Hale, Tottenham Green, Seven Sisters, St Ann's, West Green, White Hart Lane and Woodside. The designation area has been chosen following a comprehensive analysis of the PRS in Haringey with specialist consultant support.

The Scheme seeks to:

- improve housing conditions;
- reduce deprivation and inequalities; and
- contribute to an improvement in the health outcomes of residents in the most deprived areas by improving property conditions and tackling fuel poverty.

Scheme

If the scheme comes into force, landlords within the designation would be legally required to apply to the Council for a license to rent the property. The property would have to meet minimum legal requirements and the licence holder would need to adhere to an agreed set of conditions for the lifetime of the licence scheme. This scheme would last for 5 years.

The proposed licence fee is £600 per property. In accordance with the Housing Act 2004, this fee must be paid by the applicant and be reasonable and proportionate to the cost of the licensing scheme – and shall not exceed the cost of the licensing scheme.

Equalities impact

Primarily, this proposal has the potential to impact residents who are living in the PRS and within the designation area identified - and landlords and letting agents whose properties will be subject to this scheme

It is estimated that 11,771 (26.9%) of properties in the PRS in Haringey are in poor property condition – which is double the national average (13%). As such, it is anticipated that there will be an overall positive equalities impact due to improvements in the standards of housing locally.

It is anticipated that there will be particular positive impacts on the following groups:

- Young people who are disproportionately more likely to experience significant problems whilst renting in the PRS – and who are overrepresented in the designated area;
- Trans and disabled people who are disproportionately likely to face discrimination in the PRS;
- Black, Asian, or Minority Ethnic residents who are disproportionately more likely to experience significant problems whilst renting in the PRS– and who are overrepresented in the designated area;
- Women and households with children who are disproportionately more likely to experience significant problems whilst renting in the PRS.

Consultation summary

The Council ran a 16-week statutory consultation. Overall, most respondents to the consultation were in favour of the proposal. A majority of residents and tenants supported the proposal – with a majority of landlords and letting agents opposing the proposal.

Some concerns were raised about the impact of the proposed licenced fees on landlords and the possibility of costs being passed on to tenants. As the licence fee costs for landlords are nominal when broken down on a weekly basis in comparison to the average market rate for rent, it is unlikely that this will financially impact landlords. Furthermore, scheme discounts will be widely publicised through direct marketing, and partnerships with local community groups, to incentivise greater compliance and reduce the costs incurred by landlords.

A recent report into the effectiveness of selective licensing found no evidence of licence fees being passed onto tenants. Therefore, there is no material risk of the scheme having an adverse financial impact on the Borough's most deprived and vulnerable tenants.

In addition, some concerns were raised by participants about the proposed scheme designation potentially widening inequalities across the borough. The targeted scheme is intended to have the opposite effect by improving living standards in the areas of the borough in most need.

The Council's preference would be to introduce a borough-wide selective licensing scheme to ensure that housing standards across all PRS properties are raised and that all residents are protected. However, Government regulations and guidance for the introduction of selective licensing mandates that local authorities must meet strict criteria before an area can be lawfully introduced. At present, the wards excluded from the scheme do not meet these criteria.

However, these wards will be kept under review and, should future evidence suggest that any of them would qualify for a scheme, we will consider applying for an additional designation. We will also continue to use our existing powers and enforcement policy to deal with reported problems in the wards excluded from the scheme.

Approval

This proposal requires full cabinet approval. As the scheme covers more than 20% of the borough, it requires further authorisation from the Department of Levelling Up, Housing and Communities before it can come into force. As part of the legislation and guidance associated with the scheme, regular monitoring of the scheme is required, alongside evidence that the Council is meeting the scheme objectives.

3. Consultation and engagement

Consultation

The Council ran a statutory consultation for 16 weeks from 17 May to 5 September 2021. This consultation was managed by an independent research company and used a variety of methods to seek feedback from stakeholders on the proposed scheme. These methods included an online survey, a postal survey, remote public workshops, stakeholder interviews, a freephone number for verbal feedback, and an email address for written feedback and queries. Adaptations were also made in light of the ongoing COVID-19 pandemic.

The key stakeholders were:

- tenants;
- landlords/letting agents;
- wider residents;
- internal services; and
- external partners.

The consultation sought to gather local views on the proposals including respondents' experiences of issues in the borough around property conditions, deprivation, and anti-social behaviour. Questions were also asked on the licensing conditions and proposed fee.

The Council promoted the consultation extensively through various communication channels, both within Haringey and beyond, to encourage landlords, tenants, agents, residents, businesses, and other interested parties to get involved.

The consultation was extended by 4 weeks from the original end date of 8 August 2021 to:

- compensate for the impact of COVID-19;
- mitigate for a delay with some of the communications sent to stakeholders; and
- allow for further advertising towards the end of the consultation to encourage greater take up.

In total, the consultation generated 956 survey responses (950 online and 6 postal). 27 people attended three public workshops. Seven stakeholders were interviewed, and 36 individuals or organisations responded with formal written submissions to the consultation.

Survey respondents were asked anonymised questions about their personal characteristics. The majority of respondents were aged between 30-44 years old

(32%). Over a quarter of respondents were aged between 45-59 years old (26%). 14% of respondents were aged 60 or above and 11% were aged 29 or below.

Nearly half of respondents identified as female (43%). Whilst 37% identified as male and 3% stated that they would describe themselves in another way.

Non-disabled people accounted for 70% of respondents and 11% of respondents reported that they lived with disabilities.

Respondents who identified as White British were the largest ethnic group (43%), followed by those who identified as White Other (22%), Black (6%), Mixed (4%) and Asian (3%). 20% of respondents preferred not to state their ethnicity.

A full breakdown of the demographic profile of respondents can be found in the consultation report, pages 65-67.

Findings

Overall response

In summary, the selective licensing scheme proposal was supported by over half of the respondents who took part in the survey (56%). Around a third disagreed with the proposal (34%). Notably:

- around two thirds of residents and private tenants were supportive of the proposal (67% each)
- the majority of landlords and agents disagreed with the proposal (79%).
- 69% of all other respondents were also supportive of the proposal.

Impact on the local area

58% of respondents felt that the scheme would have a positive impact on the proposed area. Around half of all respondents (46%) felt the proposed scheme would have a positive impact on other nearby areas, and 43% felt the proposed scheme would have a positive impact on themselves and/or their business or organisation (43%).

Residents, private tenants and all other respondents were generally positive across the board, whilst landlords and agents were negative across the board, feeling that it would have either a negative impact or no impact.

Wider impact of the scheme

When asked about whether the proposed licensing conditions would help improve the quality of the neighbourhood, property safety and standards, and management standards, support was positive overall (with between 62% and 67% agreeing), although around a quarter (24-27%) disagreed. Support was stronger amongst other respondents (between 81% - 86% agreed, as well as residents and private tenants (at least seven in ten agreed). Most landlords and agents disagreed (59%-64%).

Level of license fee

Over half of respondents (51%) supported the level of licence fee, whilst four in ten disagreed (40%). Similarly, over half (51%) agreed that the proposed discounts on the licence fee were reasonable, with a lower proportion responding that they were unreasonable (24%). Again, support was stronger amongst residents, private tenants and other respondents, regarding the fee and proposed discounts, and weaker amongst landlords and agents.

Some tenants were concerned that licence fee costs may be passed on to them via their rent. However, there is no evidence of this from other local authorities who have administered similar schemes. Enfield, Hackney and Waltham Forrest all have licensing schemes, and the Council has a similar scheme in place for property rented to multiple tenants.

Over a five-year period, the cost of the proposed licence fee works out to £2.31 per week. The median monthly private rent in Haringey is £1,500[1]. This was previously £70 less than the London average but is now £65 above it. The mean private rent is now £1,644 a week. This has increased by 17.4% in the last 4 years, a higher rate than local authority rents (5.5%) and London private rent (10.3%) It is therefore anticipated that the set fee will be affordable for most landlords.

4. Data and Impact Analysis

Please consider how the proposed change will affect people with protected characteristics

4a. Age

Data

Borough Profile 2

56,718: 0-17 (21%)
72,807: 18-34 (27%)
68,257: 35-49 (25%)
44,807: 50-64 (17%)
28,632: 65+ (11%)

Target Population Profile

We do not hold any local data on the representation of those with protected characteristics living in or letting properties in the PRS in Haringey.

However, we know from the ONS Mid-Year Population Estimates 2018 that those aged 20-44 are overrepresented in the following wards included in our designation area in comparison to the Haringey average of 42.5%: Harringay (54.3%), St Ann's (49.9%), Woodside (47.8%), Noel Park (47.3%) and Tottenham Green (44.8%).

Those aged 65+ are under-represented in most of our designation area wards (covering the East side of the borough) compared to the rest of Haringey.

[1] 12 month rolling period to Q2 2020-21
2 Source: State of the Borough

Data sources

i. Ward profiles
ii. English Private Landlord Survey 2018, Ministry of Housing, Communities and Local Government (Figure 1.3: Landlords by age)
iii. Internet access – households and individuals, Great Britain: 2020, Office for National Statistics
iv. UK private rented sector: 2018, Office for National Statistics
v. A time for change: making renting fairer for private renters, Shelter (November 2020)

Findings

The Annual Population Survey 2017 found that younger households are more likely to rent privately than older households; with those in the 25 to 34 years age group representing the largest group (35%). A recent report by the housing charity, Shelter, found that young renters are disproportionately more likely to experience significant problems whilst renting in the PRS.

Given that those aged 20-44 are overrepresented in nearly half of the wards included in our designation area compared to the wider demographic profile of the borough, the proposed selective licensing scheme is likely to disproportionately affect younger households. Furthermore, there is a higher likelihood that many of these young renters will be experiencing problems with their housing.

The English Private Landlord Survey 2018 found that landlords are, on average older than the general population, 57 years old. This is 18 years older than the median age for the population of England and Wales as per the 2011 Census. Over half (59%) of landlords are aged 55 or older, representing 62% of tenancies in England and Wales.

We know from the latest Office of National Statistics data release on internet access in Great Britain that households with one adult aged 65 years and above have the lowest proportion of internet connections. Assuming that the aforementioned patterns are replicated in Haringey, there may be some older landlords operating in the borough without internet access or limited computer literacy.

Impacts

It is estimated that 11,771 (26.9%) of properties in the PRS in Haringey are in poor property condition, this is double the national average (13%). Problems often go unreported as tenants fear the possibility of a retaliatory ‘no fault’ eviction. Under selective licensing, renters will have greater protections as landlords will have to oblige with the scheme’s set licence conditions or risk enforcement action. Furthermore, the Council will no longer be required to give landlords 24 hours’ notice prior to an inspection. This will reduce the likelihood of tenants facing retribution for reporting their concerns. Therefore, the overall impact of the proposed scheme will be positive for all age groups renting privately in the borough, with young renters set to benefit the most as they make up the highest proportion of private renters.

In terms of accessibility, alternative means of applying for a licence will be offered for older landlords operating in the borough without internet access or limited computer literacy. Therefore, there will be no negative impact on this group.

4b. Disability

Data

Borough Profile [3]

4,500 people have a serious physical disability in Haringey.
19,500 aged 16-64 have a physical disability this equates to approximately 10% of the population aged 16-64.
1,090 people living with a learning disability in Haringey.
4,400 people have been diagnosed with severe mental illness in Haringey.

Target Population Profile

We do not hold any local data on the representation of those with protected characteristics living in or letting properties in the PRS in Haringey and we are unable to locate a comparable breakdown of the disability profile of the general population in our proposed designation area.

Data sources

i. State of the Borough
ii. Disability and housing, UK: 2019: Office of National Statistics

Findings

In the 2011 Census, 23% of households in the Borough had one identified person with a long-term health problem or disability. This is similar to the London average (22%).

We know from the 2019 Annual Population Survey that disabled people are only slightly less likely to live in private rented accommodation than their non-disabled counterparts. On this basis, it is unlikely that those with disabilities are overrepresented in our proposed designation area.

Impacts

Residents

Should the scheme go ahead, landlords will be required to obtain a licence to legally let their property in the proposed designation area. Licence holders will be obliged to comply with the set licence conditions, which in turn will help to raise property standards across the East side of the borough. Poor housing conditions have a negative impact on tenant's health and exacerbate existing health issues. An improvement in housing conditions will therefore have a positive impact on those with disabilities and more complex health needs.

3 Source: 2011 Census

Fit and proper persons tests will also be conducted prior to granting licences. Prospective applicants will be required to declare '*Details of any finding by a court or tribunal against the licence holder and/or the manager that they have practiced unlawful discrimination on the grounds of sex, colour, race, ethnic or national origin or disability'*. This will provide greater protection to those with disabilities by reducing the number of landlords operating in the Borough with a history of unlawful discrimination.

Landlords

An online form will be used as our principal method of applying for a licence. Where necessary, reasonable adjustments will be made for applicants with accessibility needs. Furthermore, we will ensure that all resources in relation to the scheme are fully accessible, including reporting. Therefore, we do not anticipate any negative impacts on landlords with disabilities.

4c. Gender Reassignment [4]

Data

Borough Profile

There is no robust data at Borough level on our Trans population, however the central government estimates that there are approximately 200,000-500,000 Trans people in the UK. Assuming an average representation, this would mean between 800 and 2000 Haringey residents are Trans.5

Target Population Profile

We do not hold any local data on the representation of those with protected characteristics living in or letting properties in the PRS in Haringey and we do not hold any data on the Trans population in our proposed designation area.

Data sources

i. LGBT in Britain – Trans Report 2018: Stonewall

Findings

Due to the absence of local and national data, we are unable to confirm whether Trans people are overrepresented in our proposed designation area. It is not anticipated that they are disproportionately represented in this area.

Impacts

4 Under the legal definition, a transgender person has the protected characteristic of gender reassignment if they are undergoing, have undergone, or are proposing to undergo gender reassignment. To be protected from gender reassignment discrimination, an individual does not need to have undergone any specific treatment or surgery to change from one's birth sex to ones preferred gender. This is because changing ones physiological or other gender attributes is a personal process rather than a medical one.

5 Trans is an umbrella term to describe people whose gender is not the same as, or does not sit comfortably with, the sex they were assigned at birth.

A recent study by Stonewall Housing investigating the specific experiences of Trans people in Britain found that one in four trans people (25%) were discriminated against when looking for a house or flat to rent or buy in the last year. In addition, the report found that one in five non-binary people (20%) had also experienced discrimination whilst looking for a new home.

Fit and proper persons tests will be conducted prior to granting licences. Prospective applicants will be required to declare '*Details of any finding by a court or tribunal against the licence holder and/or the manager that they have practiced unlawful discrimination on the grounds of sex, colour, race, ethnic or national origin or disability'*. This will provide greater protection to trans tenants by reducing the number of landlords operating in the Borough with a history of unlawful discrimination.

4d. Marriage and Civil Partnership

Data

Borough Profile 6

Divorced or formerly in a same-sex civil partnership which is now legally dissolved: (8.2%)

In a registered same-sex civil partnership: (0.6%)

Married: (33.3%)

Separated (but still legally married or still legally in a same-sex civil partnership): (4.0%)

Single (never married or never registered a same-sex civil partnership): (50.0%)

Widowed or surviving partner from a same-sex civil partnership: (3.9%)

Target Population Profile

We do not hold any local data on the representation of those with protected characteristics living in or letting properties in the PRS in Haringey and we are unable to locate a comparable breakdown of the marriage and civil partnership status of the general population in our proposed designation area.

Data sources

i. LGBT in Britain – Hate Crime and Discrimination Report 2017: Stonewall

Findings

Due to the absence of local and national data, we are unable to confirm whether those in same sex civil partnerships are overrepresented in our proposed designation area. However, we do not anticipate that they are disproportionately represented in this area.

Impacts

6 Source: 2011 Census

A recent study by Stonewall Housing investigating the specific experiences of LGBT people in Britain found that one in ten LGBT people (10 per cent) who were looking for a house or flat to rent or buy in the last year were discriminated against because of their sexual orientation and/or gender identity.

Fit and proper persons tests will be conducted prior to granting licences. Prospective applicants will be required to declare '*Details of any finding by a court or tribunal against the licence holder and/or the manager that they have practiced unlawful discrimination on the grounds of sex, colour, race, ethnic or national origin or disability'*. We intend to expand this clause to cover all the protected characteristics, including marriage and civil partnership. This will provide greater protection to queer tenants in same sex civil partnerships by reducing the number of landlords operating in the Borough with a history of unlawful discrimination.

4e. Pregnancy and Maternity

Data

Borough Profile [7]

Live Births in Haringey 2019: 3646

Target Population Profile

We do not hold any local data on the representation of those with protected characteristics living in or letting properties in the PRS in Haringey and we are unable to locate a comparable breakdown of live births in our proposed designation area.

Data sources

i. A time for change: making renting fairer for private renters, Shelter (November 2020)

Findings

In a recent report by the housing charity, Shelter, people with children in the household were identified as one of the UK's worst hit groups of renters that were disproportionately more likely to encounter the most/worst problems when privately renting.

Impacts

Given that people with children are disproportionately likely to face challenges when privately renting, this group stands to benefit from the proposed changes.

Furthermore, selective licensing will provide expectant and new mothers with greater protection from retaliatory 'no fault' evictions, as the Council will no longer be required to give landlords 24 hours' notice prior to an inspection. This should encourage more people to report any difficulties they are facing without fear of retribution.

7 Births by Borough (ONS)

4f. Race

Data

Borough Profile [8]

Arab: **0.9%**
Any other ethnic group: 3.9%

Asian: **9.5%**
Bangladeshi: 1.7%
Chinese: 1.5%
Indian: 2.3%
Pakistani: 0.8%
Other Asian: 3.2%

Black: **18.7%**
African: 9.0%
Caribbean: 7.1%
Other Black: 2.6%

Mixed: **6.5%**
White and Asian: 1.5%
White and Black African:1.0%
White and Black Caribbean: 1.9%
Other Mixed: 2.1%

White: **60.5% in total**
English/Welsh/Scottish/Norther Irish/British: 34.7%
Irish: 2.7%
Gypsy or Irish Traveller: 0.1%
Other White: 23%

Target Population Profile

We do not hold any local data on the representation of those with protected characteristics living in or letting properties in the PRS in Haringey.
However, we know from the 2011 Census that those of Black ethnicity are overrepresented in the following wards included in our proposed designation area in comparison to the Haringey average of 18.8%: Bruce Grove (31.9%), White Hart Lane (28.3%), Tottenham Hale (32.7%), Tottenham Green (28.8%) and Northumberland Park (40.3%).

Those of White Other ethnicity are overrepresented in the following wards included in our proposed designation area in comparison to the Haringey average of 25.9%:

8 Source: 2011 Census

Woodside (33.5%), St Ann's (31.2%), Seven Sisters (29.9%), Tottenham Green (27.9%) Noel Park (approx. 30%), Harringay (31.7%) and Bounds Green (30.5%).

Data sources

i. Ward profiles
ii. English Private Landlord Survey 2018, Ministry of Housing, Communities and Local Government (Figure 1.3: Landlords by age)
iii. A time for change: making renting fairer for private renters, Shelter (November 2020)
iv. Selective licensing consultation report (December 2021)

Findings

Black and White Other people are overrepresented in our proposed designation area.

In a recent report by the housing charity, Shelter, people from a Black, Asian and Minority Ethnic background were identified as one of the UK's worst hit groups of renters that were disproportionately more likely to encounter the most/worst problems when privately renting.

Shelter's research also found that some local authorities were using selective licensing as a tool for immigration enforcement by working with border authorities to carry out raids on tenants whose immigration status was unclear. Immigration raids are controversial, with many migrant welfare and human rights charities advocating against them. Concerns about the risks to migrant communities should licensing be used as a form of immigration enforcement, were echoed by some of our partner community organisations interviewed as part of our public consultation.

In addition, partners emphasised the need for a proactive enforcement approach to engage with minority ethnic groups, as the current reactive enforcement approach was struggling to reach these groups.

We do not hold any data on the ethnicity of landlords operating in Haringey. However, we know from the English Private Landlord Survey 2018 that the majority (89%) of landlords are White. This is less ethnically diverse than the general population. At the time of the 2011 Census, 86% of the population identified as White.

Impacts

Given that residents from Black, Asian and Minority Ethnic backgrounds are overrepresented in the designated area and are disproportionately likely to face significant challenges in the PRS, it is anticipated that there will be a positive equalities impact for this protected characteristic. Licensing will provide greater protections for these tenants by reducing the fear of retaliatory 'no fault' evictions and helping to remove landlords with a record of discriminatory practices. Furthermore, improved property conditions will help to close the gap on the existing health inequalities faced by ethnic minority groups.

In order to maximise the benefits of licensing for ethnic minority groups, we will need to retain their trust so that they feel safe to raise any problems they are experiencing with the Council. We will therefore seek to avoid joint visits with border authorities, with the exception of when we are legally required to do so. We have been very clear in our scheme objectives that the purpose of the proposed scheme is to help to tackle deprivation and drive-up property standards and we intend to honour this.

4g. Religion or belief

Data
Borough Profile [9]
Christian: 45%
Buddhist: 1.1%
Hindu:1.9%
Jewish:3%
Muslim: 14.2%
No religion: 25.2%
Other religion: 0.5%
Religion not stated: 8.9%
Sikh: 0.3%

Target Population Profile

We do not hold any local data on the representation of those with protected characteristics living in or letting properties in the PRS in Haringey.

However, we know from the 2011 Census that Muslim residents are overrepresented in the following wards included in our proposed designation area in comparison to the Haringey average of 14.2%: Noel Park (19.1%), Northumberland Park (24.2%), Tottenham Hale (20.3%), St Ann's (17.1%), West Green (21.2%), White Hart Lane (23.9%) and Woodside (17%).

We also know that Jewish residents are overrepresented in Seven Sisters (18.1%) compared to Haringey more widely.

Data sources

i. Ward profiles

Findings

Muslim and Jewish residents are overrepresented in our proposed designation area.

Impacts

9 Source: 2011 Census

Given that residents from some religious backgrounds are overrepresented in the proposed designated area, they may be disproportionately likely to benefit from the proposals set out here.

4h. Sex

Data

Borough profile [10]

Females: (50.5%)

Males: (49.5%)

Target Population Profile

We do not hold any local data on the representation of those with protected characteristics living in or letting properties in the PRS in Haringey and we are unable to locate a comparable breakdown of the sex of the general population in our proposed designation area.

Data sources

i. A time for change: making renting fairer for private renters, Shelter (November 2020)

Findings

Due to a lack of local data, we are unable to confirm whether women are overrepresented in our proposed designation area. However, as they are overrepresented on the housing register, we believe that there is an increased likelihood of a higher number of women renting privately than men.

In a recent report by the housing charity, Shelter, women were identified as one of the UK's worst hit groups of renters that were disproportionately more likely to encounter the most/worst problems when privately renting.

Impacts

Given that women are disproportionately likely to face challenges when privately renting, this group stands to benefit from the proposed changes. This includes but not limited to: better property conditions, reduced fear of retaliatory 'no fault' evictions and greater protection from landlords with a record of unlawful discrimination.

4i. Sexual Orientation

Data

Borough profile [11]

3.2% of London residents aged 16 or over identified themselves as lesbian, gay or bisexual in 2013. In Haringey this equates to 6,491 residents.

Target Population Profile

10 Source: 2011 Census
11 Source: ONS Integrated Household Survey

We do not hold any local data on the representation of those with protected characteristics living in or letting properties in the PRS in Haringey and we are unable to locate a comparable breakdown of the sexual orientation of the general population in our proposed designation area.

Data sources

i. LGBT in Britain – Hate Crime and Discrimination Report 2017: Stonewall

Findings

Due to the absence of local and national data, we are unable to confirm whether LGBT people are overrepresented in our proposed designation area. However, we do not anticipate that they are disproportionately represented in this area

Impacts

A recent study by Stonewall Housing investigating the specific experiences of LGBT people in Britain found that one in ten LGBT people (10 per cent) who were looking for a house or flat to rent or buy in the last year were discriminated against because of their sexual orientation and/or gender identity.

Fit and proper persons tests will be conducted prior to granting licences. Prospective applicants will be required to declare 'Details of any finding by a court or tribunal against the licence holder and/or the manager that they have practiced unlawful discrimination on the grounds of sex, colour, race, ethnic or national origin or disability'. We intend to expand this clause to cover all the protected characteristics, including sexual orientation. This will provide greater protection to queer tenants by reducing the number of landlords operating in the Borough with a history of unlawful discrimination.

4j. **Socioeconomic Status (local)**

Data

Borough profile

Income [12]

Haringey is the 4th most deprived in London as measured by the IMD score 2019 (where 1 = most deprived). The most deprived LSOAs (Lower Super Output Areas or small neighbourhood areas) are more heavily concentrated in the east of the borough.

22.4% of the population in Haringey aged 16-65 receive Universal Credit as of March 2021.

29% of employee jobs in the borough are paid less than the London Living Wage.

The average wage of someone working in Haringey is £30,452 per year and the average resident wage (including people who travel out of the borough for work) is £35,769 per year.

12 Source: Annual Survey of Hours and Earnings, ONS, 2019

Educational Attainment13

While Haringey's proportion of students attaining grade 5 or above in English and Mathematics GCSEs is higher than the national average, it performs worse than London.

5.5% of Haringey residents have no qualifications.

Target Population Profile

We do not hold any local data on the socio-economic status of those living in or letting properties in the PRS in Haringey.

However, we know from the DWP/MYE Claimant Count December 2019 that the number of residents who claim benefit principally for unemployment is substantially above the Haringey level (251.8 claimants per 10,000 residents) in half of the wards included in our designation area. This includes Northumberland Park which has the highest claimant count in the borough (442.6 claimants per 10,000 residents).

According to the GLA Household Income for Small Areas 2012/13, the median household income in eleven of the twelve wards included in our designation area is below both the Haringey and London averages (£37,696 a year and £39,264 a year respectively). This includes the four wards within the borough with the lowest median household incomes: Tottenham Green (£28,920 a year), Tottenham Hale (£27,340), White Hart Lane (£27,010) and Northumberland Park (£25,090).

As for educational attainment, DfE 2018/19 data on Key Stage 4 performance found that in three quarters of the wards included in our designation area the proportion of pupils attaining a grade 4 or above in English and Maths was below both the Haringey and London averages (65.1% and 68.8% respectively). This included the three poorest performing wards in the borough: West Green (51.6%), Bruce Grove (50.9%) and Tottenham Green (44.3%).

Data sources

i. Ward profiles
ii. A time for change: making renting fairer for private renters, Shelter (November 2020)
iii. Annual Fuel Poverty Statistics Report, 2021, Department for Business, Energy and Industrial Strategy (Figure 3.14)
iv. An Independent Review of the Use and Effectiveness of Selective Licensing, MCHLG (June 2019)

Findings

We have chosen deprivation as a criterion to introduce selective licensing due to the demonstrable poorer outcomes for those living in the East side of the borough. People living within our proposed designation area are more likely to have a lower household income, claim universal credit for unemployment or have poor educational outcomes.

13 Source: Annual Population Survey 2019 (via nomis)

In a recent report by the housing charity, Shelter, the following socio-economic groups were identified as some of the UK's worst hit renters that were disproportionately more likely to encounter the most/worst problems when privately renting:

- people on the lowest household incomes;
- people claiming Housing Benefit; and
- people who are not working, but not retired (students, unemployed and other working age people who are not employed, such as unpaid carers).

We also know from the 2021 Annual Fuel Poverty Statistics Report that the PRS has the highest level of fuel poverty with 26.8 per cent of these households being fuel poor.

Impacts

By raising property standards across the PRS in our proposed designation area, selective licensing will have an overall positive impact on tackling the socio-economic inequalities observed on the East side of the Borough. We know that housing and mental health are closely linked. Therefore, the anticipated improvements to property conditions are highly likely to have a positive impact on the mental wellbeing of the Borough's most deprived and vulnerable tenants.

Deprived and vulnerable tenants will also have greater protection from retaliatory 'no fault' evictions, as the Council will no longer be required to give landlords 24 hours' notice prior to an inspection. This should encourage more people to report any difficulties they are facing without fear of retribution.

As part of our wider strategy to improve property conditions, we will also be working in conjunction with the affordable energy team to encourage landlords to improve the energy efficiency ratings of their properties. Again, this will have a positive impact on the most deprived households within our proposed designation.
During our public consultation, some concerns were raised by participants about the proposed scheme designation potentially widening inequalities across the borough. As explained above, the targeted scheme is intended to have the opposite effect by improving living standards in the areas of the borough in most need.

The wards excluded from the scheme will be kept under review and, should future evidence suggest that any of them would qualify for a scheme, we will consider applying for an additional designation. We will also continue to use our existing powers and enforcement policy to deal with reported problems in the wards excluded from the scheme.

Concerns were also raised about the impact of the proposed licenced fees on landlords and the possibility of costs being passed on to tenants. As the licence fee costs for landlords are nominal when broken down on a weekly basis in comparison to the average market rate for rent, it is unlikely that this will financially impact landlords. Furthermore, scheme discounts will be widely publicised through direct marketing, and partnerships with local community groups, to incentivise greater compliance and reduce the costs incurred by landlords.

A recent report into the effectiveness of selective licensing found no evidence of licence fees being passed onto tenants. Therefore, there is no material risk of the scheme having an adverse financial impact on the Borough's most deprived and vulnerable tenants.

5. Key Impacts Summary

5a. Outline the key findings of your data analysis.

The analysis of different protected characteristics suggests that there will be a positive overall equalities impact, with a particular potential positive impact on the following groups:

- Young people who are disproportionately more likely to experience significant problems whilst renting in the PRS – and who are overrepresented in the designated area;
- Trans and disabled people who are disproportionately likely to face discrimination in the PRS;
- Black, Asian, or Minority Ethnic residents who are disproportionately more likely to experience significant problems whilst renting in the PRS – and who are overrepresented in the designated area; and
- Women and households with children who are disproportionately more likely to experience significant problems whilst renting in the PRS.

5b. Intersectionality

It is recognised that a number of residents in the PRS are likely to have more than one protected characteristic – for example, Black Women or people with disabilities who are LGBT.

It is anticipated that the overall impact of this proposal will be positive by driving up the local quality of housing and reducing discrimination. Therefore, it is anticipated that this proposal will have a positive impact on those who have multiple protected characteristics.

5c. Data Gaps

We undertook a borough-wide consultation which was open to anyone wishing to participate. Private sector landlords and tenants were specifically targeted, and we engaged with local community groups to help promote the consultation.

As we do not hold specific data on of those living in or letting properties in the PRS, we have been unable to specifically target our consultation at any one protected group.

However, we do not believe this data gap compromises the effectiveness of our proposal, as it seeks to drive up standards for all privately rented properties within our proposed designation area.

6. Overall impact of the policy for the Public Sector Equality Duty

Summarise the key implications of the decision for people with protected characteristics.

We do not believe that this proposal will result in any direct/indirect discrimination for any group with protected characteristics.

As previously stated, the aim of the proposal is to drive up standards for all privately rented properties within our proposed designation area and licensing will be a legal requirement for any landlord/letting agent letting property in the area.

By virtue of the scheme operating within all 12 wards on the East side of the Borough, which all suffer from high levels of deprivation, selective licensing will help to bridge inequalities faced across the borough. Furthermore, improved property management is likely to result in better community relations.

7. Amendments and mitigations

7a. What changes, if any, do you plan to make to your proposal because 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.

7b. What specific actions do you plan to take to remove or mitigate any actual or potential negative impact and to further the aims of the Equality Duty?

We have not found any evidence of any potential negative impacts on any of the protected groups as a result of our proposal.

8. Ongoing monitoring

Summarise the measures you intend to put in place to monitor the equalities impact of the proposal as it is implemented.

Date of EQIA monitoring review: Interim annual reporting from the go live date.

In accordance with Section 84 of the Housing Act, we will periodically review the operation of our designation to ensure it is achieving the desired effect and, if deemed appropriate to do so, we will consider revoking the designation. Reporting will be led by the Private Sector Housing Team Manager and conducted on an annual interim basis for the five-year duration of the proposed scheme to ensure appropriate accountability and track the scheme's progress. This will include progress against the set objectives, alongside the reporting of key metrics (number of licences issued, average time between application and granting of a licence, number of unlicensed properties identified etc.). Any adverse or unforeseen equalities impacts will also be considered at this time.

A robust evidence base for the effectiveness of the scheme will be imperative to the success of any further applications to the Department of Levelling Up, Housing and

Communities to renew the scheme. We will also be required to run another public consultation to seek the views of relevant groups and our local communities on any such proposal. The Secretary of State will only confirm a renewal if they are satisfied there is a continuing need for the scheme and the consultation and other requisite processes have been followed accordingly.

8. Authorisation

EQIA approved by (Assistant Director/ Director) **[Type answer here].**

Date **[Type answer here].**

9. Publication

Please ensure the completed EQIA is published in accordance with the Council's policy**.**

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

Report for: Cabinet – 8 March 2022

Title: Chocolate Factory Phase 1 - Approval to Let Construction Contract

Report Authorised by: David Joyce, Director of Housing, Regeneration and Planning

Lead Officer: Robbie Erbmann, Assistant Director for Housing

Ward(s) affected: Noel Park

Report for Key/ Non Key Decision: Key Decision

1. Describe the issue under consideration

1.1. This report seeks approval to appoint the recommended Contractor at the recommended contract sum set out at Appendix 3, to undertake the new build construction works to create eighty (80) Council rented homes and 356 m² of affordable workspace for the scheme known as Chocolate Factory Phase 1 and to appropriate the land for planning purposes to facilitate the development.

1.2. At 80 Council Rent homes, this will be the Council's most significant direct delivery scheme to date.

2. Cabinet Member Introduction

2.1. We have the chance tonight to put 80 new Council homes at the heart of the Wood Green Cultural Quarter. I'm very pleased to recommend that Cabinet should approve these plans.

2.2. The homes proposed here have been designed to the highest standards of energy efficiency, and the development will be net zero-carbon. In time, they will all be connected to the District Energy Network, harnessing energy from otherwise wasted sources to reduce emissions and protect our residents against fuel poverty. All homes will have access to a shared podium garden and a public courtyard with new trees, planting, and landscaping.

2.3. The Council has worked collaboratively to make sure the development also preserves and enhances facilities for the thriving local arts, creative, and small business community.

3. Recommendations

Cabinet is asked:

3.1 To approve the appointment of the recommended Contractor (identified in the exempt part of the report – Appendix 3) to undertake the new build works for the scheme known as the Chocolate Factory Phase 1 for a contract sum set out in Appendix 3. Please refer to paragraph 16 of Appendix 3.

3.2 To approve the appropriation of the land at the Chocolate Factory site (edged red in the plans attached at Appendix 2) from general purposes to planning purposes under Section 122 of the Local Government Act 1972 as they are no longer required for the purpose which they are currently held, and for the purpose of carrying out development as set out in section 6 of this report.

3.3 To approve the appropriation of the land at the Chocolate Factory site (edged red in the plan attached at Appendix 1) from planning purposes to housing purposes under Section 19 of the Housing Act 1985, after practical completion of the construction works.

3.4 To approve the appropriation of the land at the Chocolate Factory site (edged red in the plan attached at Appendix 1) from the General Fund to the HRA (at practical completion of the construction works) at the value of £500,000.00; representing the apportioned purchase and associated acquisition costs of the Chocolate factory site.

3.5 To approve the use of the Council's powers under Section 203 of the Housing and Planning Act 2016 to override easements and other rights of neighbouring properties infringed upon by the Chocolate Factory Phase 1 development, under planning permission Ref: HGY/2017/3020 and by the subsequent s96a amendment to this permission, under planning Ref: HGY/2021/0624.

3.6 To delegate to the Director of Housing, Regeneration and Planning, after consultation with the Director of Finance and the Cabinet Member for House Building, Placemaking and Development authority to make payments of compensation as a result of any infringement arising from the development and the recommendation 3.1.3, within the existing scheme of delegation.

3.7 To note a total scheme-to-completion cost is contained at Appendix 3.

4. Reasons for decisions

4.1. The acquisition of the head leases held by Workspace over Council owned freehold land at the Chocolate Factory site and the neighbouring Mallard Place site were approved by Cabinet in October 2020. The intention was both sites would ultimately enter the Council's housing delivery programme, with the Chocolate Factory Phase 1 progressing first as it already had an extant planning consent. A s96a planning amendment has subsequently been approved to facilitate the development of the site (given the Council is acquiring part of the wider Chocolate Factory site with Workspace developing the rest).

4.2. Completion of the acquisition of the two head leases took place on 10th February 2022.The Council's site (known as the Chocolate Factory Phase 1) is now ready to progress to construction, with priority given to commencing development of the affordable housing. This report therefore marks the second, and final, Member-led decision to develop this site for social housing.

4.3. Following a formal tender process, a contractor has been identified to undertake these works.

4.4. The head leases will be merged with the freehold title which is held in the General Fund and appropriation of the Chocolate Factory Phase 1 site for planning purposes is required as it will allow the Council to use the powers contained in section 203 to override easements and other rights of neighbouring properties and will prevent injunctions that could delay or prevent the Council's proposed developments. Section 203 converts the right to seek an injunction into a right to compensation. The Chocolate Factory Phase 1 site will need to be appropriated back from planning purposes to housing purposes on completion of the development to enable the Council to use the land for housing and let eighty new Council homes at Council rent.

4.5. The development of new Council homes and affordable workspace at the Chocolate Factory Phase 1 will also serve as the Council's first direct delivery project to contribute towards the objectives and ambitions of the 'Wood Green Cultural Quarter', a Council-led plan to coordinate the regeneration and economic development of the area to the west of the High Road in Wood Green.

4.6. These recommendations are also necessary at this time to support the Council's ambition to achieve 1000 starts on site before the end of March 2022, with GLA grant funding for the site also being contingent upon achieving a start on site by this date.

5. Alternative options considered

5.1. It would be possible not to develop the Chocolate Factory Phase 1 site for housing. However, this option was rejected as it does not support the Council's commitment to deliver a new generation of Council homes and considering the rationale behind Cabinet's decision to acquire the head leases in the first place.

5.2. This opportunity was procured via a competitive tender using the Westworks Development and Construction Dynamic Purchasing System. The Council previously issued a tender via the London Construction Programme (LCP) Major Works 2019 Framework Agreement, the recommended route for a contract of this value, but this resulted in only a single tender being returned, which did not meet the Council's requirements, principally in relation to the construction cost. The choice of an alternative framework was considered and ultimately utilised only after first testing the Council's own procurement framework.

5.3. The Council could continue with the scheme without appropriating the site for planning purposes, but this would risk the proposed developments being delayed or stopped by potential third party claims. By utilising the powers under Section 203 of the Housing and Planning Act 2016 (HPA 2016), those who benefit from third party rights will not be able to seek an injunction since those rights or easements that are overridden are converted into a claim for compensation only. The Council recognises the potential rights of third parties and will pay compensation where a legal basis for such payments is established. When seeking planning permission, Workspace actively engaged with local residents about the development of these sites as they proceeded through the feasibility and design stages and any comments or objections raised were taken into consideration by Planning Committee in reaching its decision. The Housing Delivery Team has also engaged with Ward Members and the Lead Member for Housebuilding, Place-making and Development, and ensured local

stakeholders have been briefed on the progress of the scheme since becoming involved with the project. For these reasons, this option was rejected.

5.4. The Council could decide not to appropriate the land for housing purposes upon practical completion of the building works. This option was rejected because it could prevent the Council from being able to offer up these homes for occupation as social housing thereby not supporting the delivery of much needed affordable homes.

6. Background information

6.1 Located in the Wood Green Cultural Quarter, the existing Chocolate Factory is described as 'one of the area's key buildings' in the Wood Green Area Action Plan. Formerly the main factory producing Barratt's sweets, the Chocolate Factory building itself is owned by Workspace, a company that offers office, studio and workshop space for rent. Alongside the main building, there are a number of smaller studios and outbuildings previously let by Workspace (mostly now vacant), as well as a large car park.

6.2 Workspace own the freehold to the eastern part of the site, and until recently controlled the western part of the site under a long leasehold over land owned freehold by the Council. Workspace intend to refurbish the main Chocolate Factory building, and redevelop the rest of the eastern section of the site for mixed use (residential and commercial). As such, in early 2019 they sought and were granted a planning permission to progress their scheme.

6.3 The Council negotiated a deal with Workspace to unlock the opportunity for the Council to control the LBH freehold land at the Chocolate Factory with the benefit of a detailed planning permission granted on 15th February 2019, and also to acquire Workspace's head lease over the neighbouring Council freehold land at Mallard Place. This was approved by Cabinet in October 2020. The completion of the contract to acquire Workspace's leases over the LBH freehold land was subject to the following in relation to the Chocolate Factory site:

- Approval of a s96a (non-material) planning amendment
- A slight redrawing of the freehold boundaries
- A revision to the s106 agreement.

6.4 The acquisition of the headleases was completed on 10th February 2022.

6.5 The Council now has full control over its unencumbered freehold interest which is held within the General Fund. The Council's portion of the Chocolate Factory site has the benefit of an extant planning permission to develop 137 homes (80 within Block E2, which forms Phase 1, and 57 within Block D, which is on land that will form part of a later phase of development) and affordable commercial floorspace. The plan at Appendix 2 shows the blocks labelled E2 and D.

6.6 At Mallard Place, there is no planning permission, but an in-situ tenant (Area 51 Education Ltd) will pay a regular rent to the General Fund, as well as the potential to develop the site in future alongside the development of the Block D area. There is also the potential in include for the redevelopment of adjacent sites on Coburg Road and Clarendon Road.

6.7 A recent non-material amendment to the planning permission (granted on 13th September 2021) changed the tenure of the consented homes on the Council's portion of the Chocolate Factory land as follows:

	Initially Consented Mix	**s96a Approved Mix**
Block E2	32 London Affordable Rent homes	73 Social Rent homes
	40 London Living Rent homes	
	8 Private homes	7 Private homes*
Block D	57 Private homes	57 Private homes

**The Sale Agreement with Workspace anticipates that in the future Workspace intend to increase the quantum of residential units on their part of the Chocolate Factory site, specifically on the section currently occupied by the Parma House building. This will increase the requirement for affordable housing across the overall site. The Agreement provides for the Council to absorb this additional requirement by converting the 7 homes currently designated as private sale tenure in Block E2 to Social Rent. We have therefore assumed that these 7 units are to be constructed and provided for Social Rent in our viability modelling and contractor procurement, although they are noted as 'Private' in the current s96a permission.*
The reason for the change from 8 Private units to 7 (albeit in reality planned to be delivered for Social Rent) was to maximise our provision of family-sized homes and allow for the delivery of a 4 bedroom ground floor duplex home.

6.8 The current planning permission for block D on the Chocolate Factory site provides for 57 mostly small homes for private sale, and there is, as noted above, potential to re-plan the redevelopment of this part of the site to include the Council's land at Mallard Place (and potentially other adjacent sites). The Council plans to bring forward a second phase of development, which considerably re-plans the proposals for this area, to better meet the Council's priorities in terms of residential tenure and size of homes. This will be brought forward separately for the appropriate Council approvals in due course.

6.9 Therefore, in the context of the Council's target of achieving 1000 Social Rented starts on site by March 2022, only Block E2 contributes towards this target. Hence the Housing Delivery Team has tendered for a main Contractor to build the 80 social rented homes in Block E2 alone at this stage in order to expedite the delivery of affordable housing (alongside the proposed affordable workspace within this block). Of the 80 units being delivered, 20 are larger family sized homes (3+ bedrooms).

6.10 New training opportunities, local investment and jobs will be generated through the development of the Chocolate Factory site. The S106 agreement associated with the planning permission for the site requires the submission for an Employment and Skills Plan (ESP) prior to commencing construction. The Council as developer and the recommended Contractor will set out in the ESP the planned objectives and targets for local training and employment opportunities to be created through the construction period, alongside a commitment to creating local economic value through procuring materials and

services from local suppliers.

6.11 Initial training and employment figures targeted by the recommended Contractor provides for: 20% of the peak on-site workforce to be Haringey residents with 25% of residents employed on site to be full-time apprentices, provision of pre-employment training to Haringey residents as well as career education workshops for secondary schools in Haringey.

6.12 The recommended Contractor has also committed to regular engagement with the Haringey Employment and Recruitment Partnership and to actively engage with local business and to encourage them to tender for work and services relating to the construction works.

6.13 As part of the broader support for the regeneration of the Wood Green Cultural Quarter, the Council is working to secure and support the crucial existing cultural and community spaces and the associated social and economic networks that are already driving local enterprise and growth. As part of the first phase of development of the Chocolate Factory site, the Council will be delivering new affordable workspace within the lower floors of block E2. This will provide 356 m² of affordable workspace (to be let at sub-market commercial rent). The Council will prepare a more detailed proposal for the marketing and letting of this space in due course, but we are committed to working with existing local affordable and creative workspace providers to ensure that this space is appropriate for local businesses who provide valuable local services but could not otherwise afford commercial space in the area. The S106 agreement associated with the planning permission for the site sets out specific requirements for the affordable work space and requires that 6 months prior to practical completion, local workspace provider Collage Arts are first offered the opportunity to take on a lease for the space.

6.14 Workspace and the Council's Housing Delivery team have progressed with the submission of details and plans to the Local Planning Authority (LPA) for approval of various pre-commencement planning conditions. The varied S106 agreement (following the approval of the S96a amendment to the planning permission, to reflect the split in land ownership between the Council and Workspace) was recently completed following the conclusion of the land transfer agreement between both parties. The original planning permission was issued in early 2019, and as such Workspace and the Council are working together to ensure this is implemented within the 3 year timeframe set by the decision notice. There are a number of S106 obligations and planning conditions still required to be completed and/or approved by the LPA prior to construction works starting on site. In the meantime, demolition works are progressing on-site, with these works being instructed by Workspace.

6.15 Workspace have instructed demolition contractors to commence the demolition works down to ground slab level across the site, including on Council land. The Council will reimburse Workspace for the relevant demolition costs, and Clifford Devlin (Workspace's demolition contractor) is operating on the Council's land under an access license.

7. The Build Contract

7.1. This report is seeking the approval for the award of a building contract to the recommended Contractor to undertake the construction works for the Chocolate Factory Phase 1 scheme.

7.2. In preparation of their planning application, Workspace instructed the design of the scheme up to Stage 2 of the Royal Institute of British Architects (RIBA) Plan of Works 2019. With planning permission secured and the Council in control of the site, a Contractor needs to be appointed to complete the construction works.

7.3. In order to select an appropriate Contractor a tender process was commenced in June 2021, via the LCP ME 2019 framework, which involved a soft market testing presentation. It was agreed with the Council's Strategic Procurement team that sufficient interest was expressed to facilitate a competitive tender – four of the nine eligible parties on the relevant framework lot indicated their willingness to tender.

7.4. At the close of the tender process only one Contractor submitted a proposal and following a review of the returned tender the Housing Delivery team agreed with Strategic Procurement to re-tender the works.

7.5. The second tender process was via Westworks with tender documentation being issued at the end of November 2021. The second tender process closed in January 2022.

7.6. The tenderers were asked to respond to a 50% quality and 50% price assessment and returned tenders were received on 20 January 2022.

7.7. Construction costs and other commercial matters were evaluated independently by the EA/QS to ascertain whether the returned tenders were in line with pre-tender estimates and pricing levels on the construction market.

7.8. The tender level submitted by the recommended Contractor is considered by the EA/QS to be consistent with competitive pricing levels currently found in the construction market.

7.9. The recommended Contractor has tabled a 92week programme, from the date of site possession to completion, which includes a 24week lead-in period (in order to complete their pre-construction works) and a 68week on-site build period.

7.10. The quality assessment was conducted via a pre-agreed list of questions that were included as part of the Qualitative Delivery Proposals. Each question was offered a score between 0 (question not answered) and 5 (excellent) together with a weighted score. The quality assessment was reviewed by the Procurement Team to ensure that a sufficient level of quality was demonstrated. Of a maximum weighted score of 100, the recommended Contractor scored 76 for their qualitative assessment.

7.11. The outcome of the quality tender review is shown below

Quality Proposal
Question 1 Understanding of the Contract Requirements and

Employer's Requirements = 4/5
Question 2 Method Statement = 4/5
Question 3 Programme = 4/5
Question 4 Supply Chain Management = 4/5
Question 5 Key Personnel and Overall Team Structure = 4/5
Question 6 Quality Assurance = 3/5
Question 7 Health and Safety = 3/5
Question 8 Employment and Skills = 4/5
Question 9 Added Value = 4/5

7.12. Taking into account both the quality and price tender returns the tender responses can be ranked as below. Further detail of the returned tenders is contained at Appendix 3.

Suppler reference	Score
Bidder 1	88%
Bidder 2	79.6%
Bidder 3	68.3%

7.13. The intention is to award a building contract on the terms and conditions as set out in the JCT standard Design and Build Contract (including the Council's standard building contract amendments). The EA is proposing the inclusion of a number of provisional sums (listed in Appendix 3) in the contract sum and the final cost of the provisional sums will only be agreed during the contract period thus presenting an area of cost risk. It is the case these provisional sums cannot, at this stage, be firmed up although the allowances contained at Appendix 3 have been reviewed and are deemed adequate.

7.14. The recommended Contractor has highlighted three elements which may be accepted by the Council for cost savings. These proposals will need to be considered by the Council at a later date once technical proposals have been prepared and fully costed. At present the recommended Contractor is proposing savings in the order of £235,000.

7.15. The recommended Contractor's tender remains open for a period of 16 weeks from 20 January 2022.

7.16. The ability of the recommended Contractor to take possession of the site is dependent on the completion of the demolition works currently being undertaken (as a condition of the site purchase agreement). These works have been instructed by Workspace under a separate contract. The progress of the demolition Contractor is being closely monitored by the Project Team and the Council's Employer's Agent, who is liaising closely with Workspace. Demolition works are expected to be completed by June 2022.

8. Updated scheme-to-completion costs

8.1. The scheme-to-completion costs has been updated to reflect received tenders for the demolition works (instructed by Workspace) and the new build

construction works. The updated scheme-to-completion costs is contained at Appendix 3.

9. Appropriation of land

9.1. This report seeks approval to appropriate the Chocolate Factory site (outlined in the plan attached at Appendix 2) for planning purposes pursuant to Section 122 of the Local Government Act 1972 as they are no longer required for the purposes for which they are currently held. The site is no longer required to be used as a car park and the buildings on the site are currently vacant.

9.2. The appropriation of the land and the subsequent development will enable the Council to take its first steps to contribute to the regeneration of the Wood Green Cultural Quarter. In addition, as part of the development, there will be a strong focus on landscaping and public realm to help promote the increased use of the outside space, support the health and well-being of the future residents and improve the biodiversity of species in the local vicinity.

9.3. This report also seeks Cabinet approval to use the Council's powers under Section 203 of the HPA 2016 to override easements and other rights of neighbouring properties infringed upon by the Chocolate Factory Phase 1 development. The types of rights that can be overridden by Section 203 of the HPA 2016 are any easements, liberty, privilege, right or advantage annexed to land and adversely affecting other land. An easement is a right of light, or right of way or interest in land which entitles a neighbouring landowner to enjoy such rights over the adjoining site. Any development which interferes with that right may entitle the owner of that right to seek an injunction preventing the development going ahead or damages for the effect on value of the right lost because of the interference. The Council recognises the potential rights of third parties and will pay compensation where a legal basis for such payments is established.

9.4. The report on title for the Chocolate Factory Phase 1 site reveals no onerous third-party interests that may impact the development. If any do exist of which we are not already aware, the Council's exercise of its powers under Section 203 of the HPA 2016 will mean the owners of those rights will not be able to stop the development by means of an injunction. Instead, where a legal basis is established, compensation will be paid in line with paragraph above.

9.5. It is not believed that any potential infringement of the third-party rights over the Chocolate Factory site are a breach of human rights, being rights to private and family life. The engagement that took place as part of the formal planning consultation process did not raise any concerns that there were possible infringements of third-party rights, including rights of light. Furthermore, if an injunction is sought by a third party for breach of a right, then if successfully claimed, the right will be converted into a right of compensation for loss of that right.

9.6. Based on the feedback from the planning consultation process, and bearing in mind Workspace have relinquished their Rights of Light over any future development on the site, there have not been any claims that any third-party rights would be infringed by the development. The likelihood of Rights of Claims from

other surrounding sites is low, given that aside from the adjacent workspace land, the Chocolate Factory site is surrounded by railway land, highway, low level warehousing and industrial buildings and land in the Council's ownership.

9.7. Regarding the value of potential compensation for the loss of third-party rights of access and or enjoyment, having undertaken the necessary checks against neighbouring properties, none have easements in relation to the site. Furthermore, no neighbouring properties have come forward asserting any rights of access or enjoyment over the Chocolate Factory site. Based on these circumstances, it is unlikely that there will be any claims, and whilst the level of potential compensation is unquantifiable until such a claim is made, it is not likely to be so significant as to impact on the scheme's viability.

9.8. In the unlikely circumstance that any claims are made and proven to have a legal basis, this report seeks approval to delegate to the Director of Housing, Regeneration and Planning, after consultation with the Director of Finance and the Cabinet Member for House Building, Placemaking and Development, authority to make payments of compensation in line with the existing scheme of delegation.

9.9. This report seeks approval for the appropriation of the land at the Chocolate Factory site (edged red in the plans attached at Appendix 1) from planning purposes to housing purposes under Section 19 of the Housing Act 1985, after practical completion of the development on or around 29th February 2024. This will recognise the site's new use as the location of 80 newly built social rented Council homes, alongside new affordable workspace, and allow them to be let as such.

9.10. Finally, this report seeks approval for the appropriation of the land at the Chocolate Factory site (edged red in the plan attached at Appendix 1) from the General Fund to the HRA (at practical completion of the construction works) at the value of £500,000.00; representing the apportioned purchase and associated acquisition costs of the Chocolate factory site.

10. Risk

10.1. Delaying the signature of the building contract beyond March '22 would put into jeopardy the current round of GLA grant funding earmarked for the development. If this was to occur, the development would stall in its contribution to the Council's aspirations of starting on site by March 2022 to deliver 1000 new council homes for Social Rent.

10.2. Furthermore, should the above happen it is unlikely that the project would be able to secure GLA grant funding via the 2021- 26 Affordable Homes Programme.

10.3. The recommended Contractor's tender is open for a period 16 weeks (from 20 January '22). Should the Council not approve the appointment of the recommended Contractor (by no later than the March Cabinet) the likelihood would be the need to re-tender the works, as there are no further Cabinet meetings planned during the remaining time that the tender price remains open,

due to the start of the pre-election period. In turn, it is probable that future tender prices would be higher because of the ongoing cost inflationary conditions within the construction sector at present.

10.4. Were the Council not to progress with the appointment of a Contractor for this project, a number of pre-commencement conditions and S106 obligations will not be cleared hampering the efforts of the Council and Workspace to progress the development plans and provide much needed homes and employment space in the Borough.

11. Contribution towards Strategic Outcomes

11.1. The recommendations in this report will support the delivery of the Housing Priority in the new Borough Plan, 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".*

11.2. 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.

12. Statutory Officers comments (Director of Finance (procurement), Head of Legal and Governance, Equalities)

12.1 Legal

12.1.1 Appropriation for Planning Purposes

12.1.2 The Council holds the site in the General Fund and it was subject to long leases which have been acquired and will be merged with the Council's freehold title. The Council will be carrying out a redevelopment on the site which may affect third party rights. In order to override any third-party rights affecting the site the Council will need to engage s203 of HPA 2016 and prevent an injunction being sought. To do this the Council will need to appropriate the site for planning purposes first.

12.1.3 The Council may appropriate land from general fund purposes to planning purposes under Section 122 of the Local Government Act 1972. Section 122 LGA 1972 allows the Council to appropriate for any purpose for which the Council is authorised by statute to acquire land by agreement any land which belongs to it and is no longer required for the purpose for which it is held immediately before the appropriation.

12.1.4 The requirements (of Section 122 LGA 1972) are that:

a) the site is Council owned land;
b) the site is no longer required for its present purpose (general fund); and
c) The Council is seeking to appropriate the land for the statutory purposes

of planning.

12.1.5 The site does not contain any open space.

12.1.6 Section 203 of the Housing and Planning Act 2016

12.1.7 By appropriating the land for planning purposes the Council is therefore able to engage the powers contained in Section 203 of the HPA 2016. Under that section the Council may carry out the development even it involves (a) interfering with a relevant right or interest (b) breaching a restriction as to use of land. This applies to building work where:

a) there is planning consent;
b) the work is on land appropriated for planning purposes (as defined under section s.246(1) of the Town and Country Act 1990);
c) the authority could acquire the land compulsorily (under section 226(1) of the Town and Country Planning Act 1990) for the purpose of the building work. This is because the land will facilitate the carrying out the development, re-development on or in relation to the land' or 'required for a purpose which is necessary to achieve the proper planning of an area in which the land is situated'. This requirement is satisfied as the Council considers that the development will lead to an improvement in the economic, social or environmental wellbeing of the areas as outlined in this report.

12.1.8 The requirements of Section 203 will be met once the appropriation takes place.

12.1.9 Appropriation for Housing Purposes

12.1.10 The Council will be seeking to appropriate the site back for housing purposes and be held within the HRA, following practical completion of the development. The Council can do so under Section 19 (1) of the Housing Act 1985. The legislation allows the Council as a local housing authority to appropriate for housing purposes any land for the time being vested in them and at their disposal. This appropriation is necessary as the new build units will be used for social housing by the Council and therefore must be held in the HRA.

12.1.11 The recommended Contractor referred to in the recommendations and identified in Appendix 3 has been procured through the Westworks Development and Construction Dynamic Purchasing System in compliance with the Public Contracts Regulations 2015.

12.1.12 Pursuant to Contract Standing Order 9.07.1(d) Cabinet has authority to approve the award of contract referred to in the recommendations.

12.1.13 The Head of Legal and Governance (Monitoring Officer) sees no legal reasons preventing Cabinet from approving the recommendations in the report.

12.2 Procurement

12.2.1 Strategic Procurement (SP) note that this report relates to the Approval of construction contract and land appropriation at Chocolate Factory Phase 1.

12.2.2 SP support the recommendations in this report in accordance with Contract Standing Order clause 7.01 (b)

12.2.3 Pursuant to CSO 7.01 (b) and Regulation 33 of the Public Contract Regulations 2015, SP confirms that tenders were invited to tender through the Westworks Development and Construction Dynamic Purchasing System.

12.2.4 The Council received 3 compliant tenders. The tenders were reviewed and evaluated independently by a quality panel and the pricing was assessed separately by the Employers Agent. The recommended Contractor has scored the overall highest as set out in the Exempt part of this report.

12.2.5 SP support the recommendations within this report and have no objections with awarding this Contract to the recommended Contractor for the value outlined in the Exempt part of the report.

12.3 Finance

12.3.1 The chocolate factory scheme will deliver 80 new social rent homes and a 356m2 affordable workspace.

12.3.2 The preferred contractor was selected from three competitive tenders made via the construction DPS route.

12.3.3 The scheme is in the current HRA financial plan and MTFS, and the estimated total cost can be met within the HRA.

12.3.4 The appropriation of land from GF to HRA represents a debt transfer, rather than a cash transfer.

12.3.5 The land value for the appropriation (£0.5m) is an apportioned cost of acquiring the entire site known as Chocolate factory & Mallard Place. This apportionment was based on the size of the plot on which this phase one scheme will be delivered.

12.3.6 The appropriation works by reducing the historical General Fund debt position by £0.5m and increasing the historical HRA debt position by £0.5m.

12.3.7 The HRA financial Plan includes this amount as part of the overall cost of this scheme to be funded through the HRA new build capital programme budget.

12.3.8 Further finance comments are contained in Appendix 3 – Exempt Report.

12.4 Equality

12.4.1 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.

12.4.2 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 apply to the first part of the duty.

12.4.3 The proposed decision is to approve the appointment of a contractor and appropriate land in order to build 80 new homes and 356 m² of affordable workspace at the Chocolate Factory site in Wood Green. The decision will increase the supply of Council rented homes which are genuinely affordable to the borough's residents, including a number of homes specifically designed for letting to tenants requiring wheelchair access. This is likely to have a positive impact on individuals in temporary accommodation as well as those who are vulnerable to homelessness. Data held by the council suggests that women, young people, and BAME communities are over-represented among those living in temporary accommodation. Furthermore, individuals with these protected characteristics, as well as those who identify as LGBT+ and individuals with disabilities are known to be vulnerable to homelessness, as detailed in the Equalities Impact Assessment of the Council's Homelessness Strategy. As such, it is reasonable to anticipate a positive impact on residents with these protected characteristics.

12.4.4 With regards to the appointment of a contractor, it is noted that as an organisation carrying out a public function on behalf of a public body, the contractor will be obliged to have due regard for the need to achieve the three aims of the Public Sector Equality Duty as stated above. Appropriate contract management arrangements will be established to ensure that the delivery of the project does not result in any preventable or disproportionate inequality. With regard to the proposed land appropriation, it is noted that no third-party breaches are foreseen.

12.4.5 The development of the Chocolate Factory site can be expected to provide training and employment opportunities to local residents. The S106 agreement associated with the planning permission for the site requires the submission for an Employment and Skills Plan (ESP) prior to commencing construction. The Council as developer and the appointed build contractor will set out in the ESP the planned objectives and targets for local training and employment opportunities to be created through the construction period, alongside a commitment to creating local economic value through procuring materials and services from local suppliers. In this context, it is notable that residents of the Wood Green area, including Noel Park, Woodside, and Bounds Green wards, are younger on average and more likely to be from BAME communities than the populations of Haringey or London. People with these protected characteristics can therefore be expected to benefit from the proposed decision, and as such it represents a measure to advance equality of opportunity for these groups.

12.4.6 There may be some potential negative impacts of the development of the Chocolate Factory site, principally relating to very minor changes to local pedestrian routes during demolition and construction and the potential for air and noise pollution generated by the development. However, these will be mitigated and managed by the requirement for air quality and noise monitoring, and local

traffic management planning as part of the Construction Management Plan required as a condition of the planning approval.

12.4.7 The Council and Workspace have already established a local community liaison group, with the first meeting taking place in December 2021. This group includes a number of local residents and representatives from local businesses, and the Council have issued invitations to local schools and education providers, business groups and residents association. Local resident representatives were selected partly to reflect the demographic profile of the local area, and meetings will take place online, with minutes published on the Council's website afterwards, to be as accessible as possible.

13. Appendices

Appendix 1 – Red line boundary of Chocolate Factory Phase 1 site
Appendix 2 – Red line boundary showing the full area of the wider Chocolate Factory site acquired from Workspace and benefitting from planning permission ref: HGY/2017/3020 (as amended by an approved s96a application ref: HGY/2021/0624)
Appendix 3 – Exempt – financial information

14. Local Government (Access to Information) Act 1985

Appendix 3 is NOT FOR PUBLICATION by virtue of paragraph 3 of Part 1 of Schedule 12A of the Local Government Act 1972 in that they contain information relating to the financial or business affairs of any particular person (including the authority holding that information).

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Appendix 1

Red Line Boundary of the Chocolate Factory Phase 1 Site



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Appendix 2

Red line boundary showing the full area of the wider Chocolate Factory site being acquired from Workspace PLC and benefitting from planning permission ref: HGY/2017/3020 (as amended by an approved s96a application ref: HGY/2021/0624)



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Report for: Cabinet – 8 March 2022

Report Title: Gourley Triangle: Acquisitions Programme and Pre-Contract Project Development

Report authorised by: David Joyce, Director – Housing, Regeneration and Planning

Report Author: Peter O'Brien Assistant Director, Regeneration and Economic Development, and Jonathan Kirby, Assistant Director for Capital Projects and Property

Ward(s) affected: St Ann's

Report for Key/ Non Key Decision: Key Decision

1. Describe the issue under consideration

1.1 The Gourley Triangle is an important Site Allocation (SS4) within the Council's adopted policy: Tottenham Area Action Plan (2017) as shown edged green on the plan attached at Appendix 1. The site allocation calls for a mixed-use development with the potential to deliver high quality employment space for small to medium enterprises, alongside much needed council rented homes.

1.2 For the purposes of this report, the site in question is outlined in red on the plan attached at Appendix 1 and is land west of Durnford Street ("the Site"). The Site forms a smaller portion of land within the Tottenham Area Action Plan boundary.

1.3 Following the Cabinet decision in July 2021 to note the draft Masterplan Objectives and proceed with the first acquisition, this report asks Cabinet to agree the acquisition of the remaining third-party land interests on the Site, based on the business case for the redevelopment of Gourley Triangle set out in this report.

1.4 In agreeing to the acquisition of the properties within the site and the associated redevelopment, a capital bid will be submitted as part of the next Medium Term Financial Strategy (MTFS) for the cost of the works element of the development. This capital bid will be a self-financing bid.

1.5 Approval is also sought for the pre-contract budget (set out in Part B of this report) to progress the development of the Site including an extension of the existing Contract with the multi-disciplinary design team through to submission of a planning application at the Royal Institute of British Architects (RIBA) Work Stage 2+.

2. Cabinet Member Introduction

2.1 Haringey's Borough Plan (2019-2023) sets out the Council's commitment to harnessing its assets and its potential to meet core priorities including:

- **Economy** –a growing economy that provides opportunities for all of the borough's residents and supports its businesses to thrive, delivered through a community wealth building approach
- **Housing** – maximising safe, stable, and affordable homes for residents
- **Place** – establishing 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

2.2 In line with these core priorities, we have shown commitment to delivering investment and locally driven placemaking on the Gourley Triangle through the noting of the Masterplan Objectives and the decision to proceed with the first acquisition at Cabinet in July 2021. The delivery of the masterplan will transform the area around South Tottenham with new employment spaces, sustainable job opportunities and high-quality homes. It will become a place for local people to work, live and enjoy, exploiting its proximity to the Seven Sisters transport network.

2.3 Since agreeing the Masterplan Objectives, significant progress has been made to develop the scheme. Feasibility work to inform the business case sets out how investment in the Site will deliver on the Council's corporate agenda whilst supporting economic recovery in the borough to responding to the challenges posed by the Coronavirus pandemic. Building on the Site's status as a 'Creative Enterprise Zone' the scheme will offer opportunities for new and existing businesses to thrive.

2.4 An innovative and inclusive placemaking programme has successfully launched, empowering local communities to participate in the design process, ensuring that the new neighbourhood aligns with their aspirations. Engagement to date has focussed on existing businesses, young people and underrepresented groups to ensure that future commercial, residential, and public spaces reflect what the local community wants and needs.

2.5 In line with the Council's ambitious Climate Change Action Plan, the project looks to achieve a zero-carbon outcome overall. Employing sustainable and renewable energy sources and promoting best design practice, we are aiming for the project to be a flagship for sustainable placemaking in the borough.

2.6 The acquisitions programme and proposed pre-contract budget are supported by a robust business case and meet the Council's agreed criteria included in the disposals and acquisitions policy. I am happy to ask Cabinet to agree to the recommendations.

3. **Recommendations**

Cabinet is asked:

3.1 To note the business case for the acquisition of the remaining third-party land parcels on “the Site” as set out in paragraphs 6.4-6.65 of the report.

3.2 To acquire, based on the business case, the remaining third-party land parcels coloured pink and situated within “the Site” outlined in red on the plan attached as Appendix 1 and to be held in the General Fund for planning purposes; and

3.3 To approve a budget for acquisitions as set out in 3.2, being a total sum set out in the exempt Part B of this report to be funded from the Strategic Acquisitions Fund.

3.4 To give delegated authority to the Director of Housing, Planning and Regeneration, after consultation with the Cabinet Member for Finance and Transformation and the Cabinet Member for House Building, Placemaking and Development, to agree the price for each acquisition and the final heads of terms and legal documentations.

3.5 To approve a budget for project development costs to Royal Institute of British Architects (RIBA) Work Stage 3+ (tender), being a total sum set out in the exempt Part B of this report to be funded from the Strategic Acquisitions Fund.

3.6 To approve the extension of the Contract with Haworth Tompkins Architects from RIBA Work Stage 1+ to RIBA Work Stage 2+ (planning application) for a total budget set out in the exempt Part B of this report.

3.7 To give delegated authority to the Director of Housing, Planning and Regeneration, after consultation with the Cabinet Member for Finance and Transformation and the Cabinet Member for House Building, Placemaking and Development, to approve a contingency sum in relation to the Contract extension with Haworth Tompkins Architects as set out in the exempt Part B of this report.

3.8 To note the key principles of the draft Business Retention and Relocation Strategy as set out in paragraph 6.25 of the report.

4. **Reasons for Decision**

4.1 The recommendations in this report support the delivery of the Gourley Triangle site allocation in Tottenham Area Action Plan (AAP). This site has long been identified as having the potential for renewal and placemaking given the poor quality of its current built environment.

<u>Business Case and Land Acquisitions</u>

4.2 The Council's employment and economic growth aspirations are ambitious, seeking to deliver 12,000 jobs in the borough by 2026 as identified within the Local Plan Planning Obligations Supplementary Planning Document (2018). The business case set out in this report has workspace at its heart with new development aiming to secure employment spaces that meet the needs of the post-Covid economy alongside wider Council objectives of placemaking, delivering council homes, and sustainability. With highly limited land supply in the borough, opportunities such as this should be carefully considered and maximised.

4.3 The Council is in a unique position to secure the Site Objectives for the Gourley Triangle. Acquisition of the remaining land interests will allow the Council control over the site and hence the ability to take forward a comprehensive redevelopment scheme.

Multi-Disciplinary Design Team Appointment

4.4 The project requires the appointment of a high quality and experienced multi-disciplinary design team to deliver the detailed planning application and technical design work to RIBA Work Stage 3+. In April 2021, Haworth Tompkins were appointed under delegated authority to deliver feasibility work up to RIBA Work Stage 1+. This paper seeks approval to extend this Contract to RIBA Work Stage 2+ as allowed for by the original procurement and give the option to approve a contingency sum under delegated authority if required.

4.5 Progression of the design to RIBA Work Stage 2+ will enable certain elements of the scheme to be designed in detail, ensuring that the planning application locks in quality that is protected from potential future value-engineering exercises.

5. Alternative Options Considered

Not agreeing the Business Case and Land Acquisitions

5.1 Not agreeing the business case and land acquisitions was rejected as it would mean that the Site would remain in its current form and would not deliver on the Masterplan Objectives noted by Cabinet in July 2021. This would result in a lost opportunity to support the Council's ambitious economic housing and growth targets as set out in the Borough Plan and result in an uncertain future for this important site.

5.2 Due to planning policy requirements and disparate land ownership, it is considered that the Council are the only party who are able to implement a holistic approach to development of the Site in a timely fashion. This report recommends such an approach.

Endorsing the business case but acquiring third party acquisitions at a later date

5.3 This option was considered and rejected. There is currently an opportunity to acquire third party land parcels and a number of third-party vendors have indicated that they have a compelling business reason to dispose at this time. Were the Council not to take the opportunity to acquire at this time, there is a risk that the sites could be sold on, and that development by a third party could take place which does not meet the Masterplan Objectives as noted by Cabinet.

5.4 This option also risks the loss of external funding from the Future High Street's Fund (FHSF) and Brownfield Land Release Fund (BLRF) as there is potential that the grant funding will need to be repaid if programme milestones are not achieved. The FHSF grant requires that it is spent by March 2024, and the BLRF grant requires land to be released for residential development also by March 2024. If these milestones are not met, then alternative funding sources would be required which would have a detrimental impact upon the scheme's deliverability and viability. Acquiring the third-party sites would provide the Council with a level of control which would not be achieved should land be owned on a piecemeal basis.

Re-procurement of the Multi-Disciplinary Design Team

5.5 The Council could seek to re-procure the services of a Multi-Disciplinary Design Team at this juncture. This option is not recommended as the original procurement exercise envisaged that the team would continue through to the next stage. It would be detrimental to the project in terms of time, cost, and quality to change the professional team at this stage in the project's delivery.

6. Background Information

<u>The Gourley Triangle – Site Context</u>

6.1 The Site is located on Seven Sisters Road within a designated "Area of Change" and sits as a smaller area within the Tottenham Area Action Plan (AAP) Site Allocation SS4. It is located within St Ann's Ward, bordering Seven Sisters and Tottenham Green Wards and is close to the West Green Road District Town Centre.

6.2 Located near to Seven Sisters Underground and Overground Stations (approximately 200 metres to the east) and South Tottenham Overground Station, the overall Tottenham Area Action Plan site area benefits from a high overall Public Transport Accessibility Level (PTAL) rating of 6a. At its eastern boundary, the PTAL rating is 6b, representing the highest achievable transport connectivity score. At its western extent the PTAL rating is 3.

6.3 Bounded on one side by railway tracks and on the other by Seven Sisters Road, a Transport for London Route Network (TLRN) road, the Site is relatively constrained. Existing buildings comprise a range of creative and commercial uses with light industrial in the older stock. The Site is adjacent to a large Wickes retail store with associated car parking.

Gourley Triangle Phase 1 Business Case

Strategic Objectives

6.4 The Site is promoted through the Tottenham Area Action Plan and forms a key part of the Tottenham Creative Enterprise Zone. In redeveloping the site, which is generally in poor condition, a significant emphasis is therefore placed on the delivery of workspace as a central part of any redevelopment.

6.5 With this backdrop, the following Masterplan Objectives were noted by Cabinet in July 2021. These illustrate how the development will contribute towards the economic, social, and environmental well-being of the area, building on the Council's wider strategic objectives as set out in the Borough Plan, notably a commitment to secure the delivery of a range of workspaces to meet the needs of a modern economy.

Objective 1 – Gourley Triangle at Work

6.6 The masterplan will build on the existing uses on the site to create a place that can exhibit significant clusters of skills and businesses with a focus on maker spaces, the arts, and creative sectors, notably fashion. These will link to other creative business in Tottenham and beyond, providing local employment and education opportunities particularly for young people.

6.7 The Site provides an opportunity for the Council to deliver a range of higher density employment spaces which will exploit the excellent connectivity provided by Seven Sister's Station and create accessible range of workspaces to suit a mix of business needs.

Objective 2 - Embracing Placemaking and Improved Connectivity

6.8 The Council is committed to a placemaking approach that involves working with residents and businesses to shape neighbourhoods by building on local knowledge and placing inclusive engagement and co-production techniques at the heart the approach. Further details are set out below at Paragraph 6.60-6.65.

6.9 The project's ongoing placemaking approach will be used to inform improvements to the Seven Sister's Road public realm. This will result in high-quality streetscape, active frontages, and mitigation of poor air quality and noise pollution through high

quality building design. New accessible landscaping and green infrastructure including green spaces will link the commercial and residential uses.

Objective 3 - Climate and Sustainability at its Heart

6.10 The masterplan will deliver on the Council's Climate Change Action Plan (March 2021), including delivering net zero for new development, targeting Passivhaus certification for residential elements and targeting the Building Research Establishment Environmental Assessment Method (BREEAM) 2018 'Excellent' for the commercial provision.

6.11 Biodiversity and access to green space will be substantially improved to meet local needs. Whilst Seven Sisters Ward has been identified as a place of public open space deficiency and St Ann's Ward itself has some of the poorest access to small local parks[1], the Covid-19 lockdowns have further increased the urgency to improve access to great space and parks.

6.12 The railway embankment adjoining the site forms part of a series of 'Sites of Importance for Nature Conservation' (SINCs) that connect several green spaces along the railway line which runs east to west across the borough. The masterplan will enhance the Grade II listed SINC and ecological corridor and enhance cycling and walking routes between green and open spaces in line with the Council's draft 'Walking and Cycling Action Plan' (2021-2031).

Objective 4 - A Community Wealth Building Approach

6.13 At every stage of the development and delivery of the masterplan the Council will employ a community wealth building approach which will extract social value wherever possible. This will involve working with local businesses both during and post-construction to ensure that the maximum local benefit is achieved.

6.14 The community wealth building approach has already enabled the procurement of 'Nooma Studio', an emerging architectural practice based at the High Cross Centre in Seven Sisters. Nooma studio form a core part of the design team and bring expert local knowledge and extensive experience engaging with local community groups in the vicinity of the masterplan area.

Objective 5 – Delivery of Council Rented Homes

6.15 In line with the Tottenham Area Action Plan site allocation, the site provides an opportunity to deliver much needed council rented homes for the borough. These will be designed to support the existing streetscape and minimise impact on neighbours, maximising daylight and dual aspect layouts.

[1] Haringey Council. (2006). *Open Space Strategy and Action Plan Executive Summary*

The Economic Case

Market Demand for Employment Uses

6.16 Avison Young have prepared a market appraisal for both private residential and commercial uses to inform viability model inputs which is attached as Appendix 5 to Part B of this report. Engagement took place with local agents, indicating a good level of interest in new build mixed-use schemes within Haringey.

6.17 Avison Young's analysis of existing workspace provision in the area and corresponding levels of demand was carried out to inform the nature and quantity of workspace that could be provided on the site. The study found that there is currently little workspace provision in the immediate area, but that there are clusters located in the wider vicinity. Market demand suggests an opportunity to provide space that is inherently flexible and can be adapted to suit occupier requirements.

6.18 Advice suggests that there has been a recent increase in small and medium enterprise (SME) activity on the site, mostly associated with the creative industries in the surrounding area. This demonstrates that there is potential for several alternative employment space typologies to be integrated into the scheme design beyond traditional office and industrial formats. These will reflect and respond to the changing nature of working practices, particularly as a result of shifting trends following the Covid-19 pandemic.

6.19 Conversations with several operators in the area has further indicated demand from a wide range of sectors, including photographers, fine artists, production companies and others.

6.20 Evidence collated in preparation of the Borough's draft Economic Development Strategy (2020) found that the arts, entertainment, and recreation sector is one of the largest employing sectors in the borough and one that has undergone substantial growth since 2015, particularly in the East of the borough, with 25% employment growth between 2016 and 2020. Employment in Clothing and Fashion production specifically grew 55% between 2013 and 2017 despite a trend towards less clothing and fashion production companies more widely[2], supporting the workspace principles set out below.

Workspace Strategy

6.21 Building on the evidence base, a draft workspace strategy has been prepared to define the types of employment spaces to be re-provided within the Masterplan.

[2] Hatch Regeneris, (February 2020). *Haringey Economic Development Strategy Economic Baseline – Final Evidence Report*

The strategy sets out a strategic approach to building on the site's status as one of the Greater London Authority's (GLA) 'Creative Enterprise Zones' which looks to create permanent, affordable creative spaces, ensuring no net loss of space.

6.22 The strategy categorises creative and commercial sectors to be retained, grown, attracted, and relocated based on their compatibility with the Masterplan Objectives. These are set out below in more detail:

- Retain: The strategy will seek to retain the existing fashion design and maker businesses on site, to build on the 'critical mass' of these uses. Other retain categories include other non-fashion creative businesses and existing educational institutions.

- Grow: Building on the existing creative provision, the strategy will support sub-sectors linked to the textile industry including textile design, screen-printing and fashion retail. The strategy will seek opportunities to grow existing local skills through apprenticeships with local businesses and links to learning institutions.

- Attract: The strategy will look to procure anchor tenant/s in the creative industries with a strong community wealth building focus. This includes potential to partner with creative education bodies by establishing academic facilities on the site to link to the creative industries as a single hub for learning, teaching and making. The strategy could also focus on attracting higher value sub-sectors following current trends in the wider area including Film and TV, IT, Design and Architecture.

- Relocate: The strategy acknowledges that certain larger industrial uses are highly incompatible with the masterplan principles and the Creative Enterprise Zone' strategic objectives – including large logistics/warehousing companies and car-related businesses who provide lower employment densities and present challenging environmental considerations alongside other commercial space and residential uses. The draft Business Retention and Relocation Strategy (BRRS) principles noted in paragraphs 6.25 and 6.27 set out how these businesses will be supported in relocation.

6.23 The current proposal will see the Masterplan scheme delivering a minimum of 15% affordable workspace at 50% of market rates, subject to design development and testing.

Business Retention and Relocation Strategy

6.24 To ensure that the development minimises disruption to existing businesses, a bespoke 'Business Retention and Relocation Strategy' (BRRS) is under development. Using evidence and data from engagement with businesses, this will aim to understand the future intentions and needs of businesses and try to accommodate these as far as possible within the masterplan.

6.25 Following completion of consultation with existing businesses, a final version of the BRSS will be agreed, the key principles of which are set out as follows:

1. A Bespoke Approach – Business Retention and Relocation Strategy principles to be informed through extensive discussions with businesses, to understand their current working conditions, aspirations, and future plans.

2. Early Engagement and Transparent Communication – Delivery of regular and easily accessible information on the project to enable businesses time to plan for their future and provide a level of certainty for them to do so effectively.

3. Endeavouring to keep businesses and jobs within the area - Where businesses wish to remain on site and their uses are compatible with the Masterplan Objectives, providing support in identifying scope to move within the site area. For businesses who cannot relocate on site, the Council will provide reasonable assistance in identifying alternative local space in the Borough or across the Productive Valley where retention in the Borough is not possible.

4. Business Support with Retention/Relocation –ensuring that potential disruption is minimised, and that support to meet the future aims and aspirations of businesses is provided, including assistance with business planning, marketing strategies and obtaining other professional advice.

5. A Clear Timeline for Commercial Transition –providing a clear timetable to enable individual businesses to remain as viable as possible during the pre-construction period and subsequent regeneration.

6.26 To date, findings from discussions with business have been structured into a Compatibility Matrix which assesses business requirements against the Masterplan Objectives, the Council's Strategic Vision and engagement feedback.

6.27 For those businesses who can be accommodated and wish to be remain on the site, the Council will provide clear and transparent communication as to the quantum and rental discount applied to space which will be designated as affordable. Alongside rent levels, the Council will set out service charges and business rate levels so that businesses can make informed decisions as to the suitability of the spaces on offer.

6.28 It is noted that there are a number of car repair businesses operating from the site whose uses are of low compatibility with the Masterplan Objectives. The Council will provide reasonable assistance to these businesses as part of the search for relocation sites in the wider region in line with Commitment 3.

The Commercial Case

Property Considerations and Land Assembly Strategy

6.36 To successfully deliver the Gourley Triangle Masterplan Objectives, the Council will need to secure all of the interests on "the Site". These have been valued by the Council's commercial advisors as part of a 'Property Cost Estimate' (PCE) as contained within Appendix 4 to Part B of this report.

6.37 Third party land interests to be acquired are shown coloured pink on the Site Plan attached as Appendix A and comprise of 8 freehold interests, 29 leasehold interests and 7 residential tenancies (excluding Metalcraft). The Council owns approximately two-thirds of the freehold interests within "the Site" and is in the process of acquiring a further site (Metalcraft). A detailed list of the sites to be acquired is set out as Appendix 2 in Part B of this report.

6.38 The Council's principal and preferred method of acquiring land is through negotiation and private treaty arrangements with individual landowners. Negotiations have commenced with several landowners and engagement suggests that there is currently an opportunity to acquire critical land interests as many landowners have expressed a willingness to dispose of their sites at this time.

<u>Land Assembly Strategy and Compulsory Purchase Order (CPO) Powers Available</u>

6.39 The Council's principal and preferred method of acquiring land is through negotiation and private treaty acquisitions with individual landowners. In this respect, negotiations have commenced with a number of landowners following the Cabinet decision to acquire the Metalcraft site in July 2021.

6.40 Should the Council fail to acquire the sites by private treaty then consideration will be given to the Council exercising Compulsory Purchase Order (CPO) powers in the future as a last resort. In advance of making a CPO, the Council will need to demonstrate reasonable attempts to acquire the land by agreement. A decision to implement a CPO would be the subject of a separate Cabinet decision, setting out justification within CPO guidance.

6.41 Government guidance on the use of CPO advises that where it is considered likely that a CPO will be required, that it is acceptable to start the preparation in tandem with undertaking negotiations.

6.42 Avison Young have advised that a minimum of 18-24 months should be allowed for the compulsory purchase process from the start of preparation work to taking vacant possession of the site. Grant funding requirements impose certain deadlines for delivery and if a CPO was required as a last resort, then officers would need to start work preparing for a possible Cabinet decision from April 2022.

6.43 Advice received from Avison Young on the estimated cost for a CPO on this site is set out in Part B of this report.

Acquisitions Policy

6.45 The proposed acquisitions have been assessed against the following criteria as set out in the Council's Disposal and Acquisitions Policy and summarised below:

Policy	Comments	
MTFS contribution	Allocation in Medium Term Financial Strategy (MTFS) includes Future High Streets Fund Grant (MHCLG) and Strategic Acquisitions Fund (Council capital funding).	✔
Asset Management Plan	Acquisitions support objectives of the Borough Plan in terms of Economy, Place and Housing	✔
Business Case	Strong case to acquire in accordance with Council's Masterplan and placemaking strategy for the Gourley Triangle site	✔
Deliverability	Acquisitions will initially form a standalone investment and the Council will seek to secure flexible interim lease arrangements pending future development of the site	✔
Valuations/ Development appraisal supports	Acquisitions will be supported by Royal Institute of Chartered Surveyors (RICS) Red Book valuations	✔
Affordability	Acquisitions will be financed using third party 'Future High Streets Fund' grant funding from the Ministry of Housing, Communities and Local Government (MHCLG) and Strategic Acquisition Fund funding from the Council's Capital Programme	✔
Legal assessment	See separate Statutory comments below	✔
Alternative options considered	See Section 5 of this report	✔
Risk assessment	See Section 6.71 of this report	✔
Political	See Member introduction in support of this transaction for approval at March '22 Cabinet	✔

Figure 1: Gourley Triangle Acquisitions Programme Assessment against the Council's Disposals and Acquisitions Policy

6.46 The proposed acquisition programme as recommended in this report accords with the planning policy objectives for the Gourley Triangle site and the placemaking and workspace objectives as approved by Cabinet in July 2021. The project supports the objectives in the Borough Plan in terms of Economy, Place and Housing as set out in Section 7 of this report. Alternative options considered are

set out in Section 5 of this report.

Acquisitions Programme – Interim Uses and No-Scheme Scenario

6.47 There is a strong business case to acquire the properties in question for the purpose of future development in line with the Masterplan Objectives. However, by acquiring based on the Property Cost Estimate (PCE), this means that should it not be possible to proceed with a comprehensive redevelopment of the Site, then the Council can seek an alternative income stream for the properties at open market rental value to cover acquisition costs. The land and properties in question will be surveyed and inspected prior to acquisition to enable re-negotiation to take place if required.

6.48 The Council will benefit from the ownership of newly acquired properties which could be sold on should the Council not proceed to implement the masterplan. Acquisitions will be undertaken based on local market evidence, to enable the Council to always maintain demonstrable value within the key strategic development opportunity.

External Funding

6.49 The Council has secured £4,800,000 of external funding from The Ministry of Housing, Communities and Local Government (MHCLG)'s 'Future High Streets Fund' (FHSF) to support the acquisitions programme. The FHSF grant must be spent by March 2024.

6.50 A further £1,435,540 of external funding has been secured from the One Public Estate (OPE) Brownfield Land Release fund (BLRF) for de-risking of site abnormals including de-contamination, demolition, and other enabling works. The BLRF grant requires that land is released, and development commences on site for residential use by 2024.

6.51 In October 2021, the Council secured 50% GLA match funding towards a 'Regeneration Sites Officer' role to support the delivery of the project. This forms part of the GLA's Economic Recovery Capacity Programme in response to the economic challenges faced as a result of Covid-19 and supports the Council's resourcing of the project.

6.52 Further external funding will be required to deliver the scheme. The Council will submit a bid for a second round of the GLA's Affordable Homes Programme 2021-26 later in 2022. The viability model assumes a £190,000 grant allowance per unit. This is consistent with the first allocation and the approach has been discussed with the GLA.

<u>Delivery and Next Steps</u>

Planning Strategy

6.53 The Council's planning application will include detailed design for the Site, alongside high-level, 'vision study' for the Wickes side of the Tottenham AAP area (ie. land east of Durnford Street). The design for the Site will be prepared to ensure that any potential subsequent development of the remainder of the AAP area comes forward in line with the Masterplan Objectives and parameters as set out in the vision study. This element would not form part of the project beyond its inclusion within the Planning Application information.

6.54 A Planning Performance Agreement (PPA) has been entered into which sets out the timescales, actions, and resources for handling the application. Two Planning Pre-Application Meetings and one Quality Review Panel (QRP) meeting have taken place, where masterplan objectives, scheme quantum and sustainability targets were discussed. It was noted that proposed land use and masterplanning principles were generally acceptable and proposed further testing of density targets.

The Emerging Scheme

6.55 Design and financial feasibility work has shown that it is possible to meet the draft Masterplan Objectives as endorsed at Cabinet in July 2021 whilst also responding to the engagement outputs from the placemaking programme as set out in Paragraph 6.64. The study indicates that the Site has the capacity to deliver approximately 240 new homes, alongside circa. 4,450m^2 of high-quality employment space as part of a new urban neighbourhood in Seven Sisters. Layouts and massing are indicative at this stage will be flexible to adapt to future consultation and engagement outcomes.

6.56 The strategic approach looks to retain and extend the existing brick warehouse building at 718-728 Seven Sisters Road alongside delivery of three new buildings, to establish a strong and consistent street frontage to Seven Sisters Road and reinforce the existing street pattern. The study illustrates potential for greater height to the rear of the site with two further new buildings. This approach will maximise density and reduce the impact on neighbouring properties, benefitting from the relationship to the Site of Importance for Nature Conservation (SINC) parkland edge. It will create a connected and dynamic landscape within the site that supports a combination of commercial and residential uses.

6.57 In line with the Tottenham AAP, the feasibility study looks to maximise the quantum of employment space whilst delivering an improvement in the quality, type, and number of jobs available, through an increase in employment density. The AAP sets out a minimum indicative development capacity of 6,600m^2 across the whole AAP site area, equivalent to 3,235m^2 for "the Site". The feasibility

scheme suggests that the scheme can, however, deliver a greater quantum than this at 4,450m^2.

6.58 In terms of residential provision, the feasibility study indicates capacity to deliver up to 27% three- and four-bedroom homes, which is lower than the Council's target dwelling mix for affordable rented housing at 45%. Due to the constraints of the site and Planning Policy requirement for an employment led scheme, there is limited availability of space to provide family units at ground floor. Furthermore, there is potential that the needs of residential elements (particularly family homes) would be in competition with the needs of the workspace provision. This element will be explored further through the planning process.

6.59 The financial appraisal of the emerging scheme is positive. Details of the appraisal are set out in Part B of this report.

Placemaking and Co-Design Programme

6.60 Webpages on the "Tottenham.London" website and an online engagement platform have been established for the project. A letter was shared with residents and business owners in the wider vicinity, with links to the online pages and an invitation to join the conversation around the project at two early engagement events:

- Meet the Design Team– An introduction to the site and Question and Answer session at an online meeting
- Forage for the Future –creative exploration of the site through photography, drawing and writing, over two afternoon sessions on site

6.61 Two young people based in Tottenham with an interest in engagement, design and the creative industries were appointed for the paid roles of 'Young Producers' as part of the project. The Young Producers developed their own research strands and engaged with their local communities to produce digital media outputs with ideas about how the creative industries in Tottenham can be strengthened to better serve the community. Outputs were published as a feature piece for Haringey People magazine, and at an online showcase.

6.62 An 'Inclusive Futures' programme during October and November 2021, included a public online workshop and in-depth interviews with residents about experiences of inclusion and exclusion in public spaces and creative communities to inform how these can be addressed through the project.

6.63 Engagement with businesses began with door-knocking sessions throughout October and November and a Business Breakfast Workshop, attended by 8 business and landowner representatives. This has been followed by in-depth engagement on a one-to-one basis with business tenants on the site.

6.64 Key insights from the engagement process so far that will be harnessed in the design strategy as it progresses include:

- Emphasis and celebration of the creative opportunities on the site and connection to the wider creative ecosystem in Tottenham
- Embracing of the character and heritage of the site as a place of making, whilst also promoting sustainability in future of the Gourley Triangle
- Noting the importance of green spaces and inclusive public spaces
- The need for continued community engagement and co-design to ensure that any new development builds on the existing community of businesses and meets their needs and aspirations

6.65 The placemaking programme will continue at RIBA Work Stage 2+, with public events planned for Spring 2022, where the team will share information as to how the Masterplan Objectives have evolved to take on board engagement work this far. This will be conducted in parallel with co-design activities with existing businesses, to information more detailed spatial requirements for commercial re-provision.

Procurement: Multi-Disciplinary Design Team Tender Process and Evaluation

6.66 The Council ran a procurement process in January 2021 to appoint a Multi-Disciplinary Design Team in line with the Public Contract Regulations 2015 and the Council's Contract Standing Orders (CSOs).

6.67 The opportunity was advertised via the Dynamic Purchasing System (DPS) and over 120 suppliers were invited to bid. The tender was based on a 60% Quality and 40% Price split, with the evaluation criteria clearly set out in the tender brief.

6.68 Seven tenders were returned. The evaluation was held on the 22nd of February 2021 and the panel included three officers from the Regeneration Team.

6.69 A summary of the tender evaluation is provided below:

Supplier	Quality Score /60	Price Score/40	Weighted Score
Haworth Tompkins	54.8%	30.1%	84.9%
Bidder 1	43.7%	35.6%	79.3%
Bidder 2	36.0%	40.0%	76.0%
Bidder 3	49.0%	23.0%	71.9%
Bidder 4	30.1%	25.0%	55.2%
Bidder 5	49.0%	8.8%	57.8%
Bidder 6	34.3%	13.5%	47.8%

Figure 2: Gourley Triangle Multi-disciplinary design team tender evaluation results

6.70 Haworth Tompkins received the highest total score of 84.9%. The practice are recognised leaders in their field with a significant relevant experience delivering large employment led schemes on constrained urban sites.

6.71 Haworth Tompkins were appointed to commence work up to RIBA Work Stage 1+, with the option to extend to RIBA Stage 2+ pending Cabinet approval. This report recommends exercising that extension in addition to recommending delegated authority to approve a contingency sum if required as set out in Part B of this report. Provision for a contingency sum would allow for the existing consultant team to include unforeseen additional works which were not included in the original procurement exercise avoiding the cost and time implications of securing further Cabinet approval for the spend.

Site-Specific Risks and Mitigations

6.72 The feasibility study has considered site specific risks and how these can be mitigated. Key risks have been noted as follows:

6.73 Risk that the GLA Affordable Homes Programme grant is not secured: The viability model includes an assumption of a grant allowance per social rented residential unit of £190,000. This is consistent with the first allocation and the approach has been discussed with the GLA but has not been secured as the next round of funding has not commenced. This risk will be mitigated through further engagement with the GLA's Housing and Land team.

6.74 Construction Inflation: The current cost plan was established by Avison Young in August 2021 and reviewed in December 2021. There is a risk that the increase in labour and materials costs could continue in a manner that compromises the scheme's viability.

6.75 Avison Young have advised that any potential cost inflation should be considered alongside predicted residential and commercial value increases. Their advice notes that they would expect house price growth to occur at a similar rate to cost inflation, and that this would be in line with current market expectations, reducing the potential impact of cost increases upon the scheme's deliverability. In any event, mitigation against cost inflation is in place through a contingency allowance in the appraisal which is set at a level based on best practice advice from Avison Young.

6.76 Ground Contamination: Initial survey work has suggested that ground conditions are likely to contain a level of made ground, and that there is likely to be contamination including asbestos due to the site's existing industrial use. Abnormal ground conditions and underground obstructions would result in cost uplift for the project. To mitigate this risk, intrusive site surveys have been programmed for the next stage of project work. An allowance has been made for de-contamination within the viability model, based on high level assumptions provided by the project Quantity Surveyor with information provided in Part B of

this report. Further funding from One Public Estate's Brownfield Land Release Fund has been secured towards these costs.

6.80 Network Rail: The location of the site close to two railway lines means that there is potential for delays and cost increases associated with agreeing a third-party Basic Asset Protection Agreement (BAPA) with Network Rail. This may require track monitoring and ground movement analysis. This risk will be mitigated through early engagement which has already commenced with Network Rail to clearly assess the programme and budget for the necessary approvals.

6.81 London Underground Line (LUL) exclusion zone: The furthest westerly side of the site is located above a London Underground Line (LUL) exclusion zone. This presents a risk in that any construction in this area must be within acceptable limits for loading levels. In addition, timescales taken for liaison with LUL can be restrictive, so this could impact on programme. This risk will be mitigated through early engagement with LUL and may require a bespoke approach to foundation design in this area of the site, alongside further geotechnical analysis.

Delivery Strategy

6.82 A further Cabinet report will be prepared in Summer 2022 to agree the Council's preferred procurement and delivery approach. The timescales for this are set out in the Indicative Programme (Item 6.83).

Indicative Programme

6.83 The indicative programme is set out below and is subject to change as the project develops:

Date	**Milestone**
March '22	**Cabinet Decision:** Acquisitions and Pre-Contract Project Development
April '22	If necessary, commence preparation of CPO Order (as a tool of last resort)
June '22	Capital Bid submitted to the MTFS for overall scheme costs
July '22	**Cabinet Decision:** - Delivery Approach - Approval to use CPO Powers (if required)
October '22	RIBA Stage 2+ Complete Planning Application submitted

January ‘23	Planning Application Decision
July ‘23	Contractor Procurement*
December ‘23	**Cabinet Decision:** Contractor Appointment
January ‘24	Enabling Works Start on Site
August ‘24	Main Construction Works Start on Site
July ‘27	Practical Completion

*Procurement route subject to review at RIBA Stage 2+

Figure 3: Gourley Triangle Indicative Milestone Programme

7. Contribution to Strategic Outcomes

7.1 The project will support the Council in delivering the following priorities in the Council’s Borough Plan.

Economy - a growing economy which provides opportunities for all our residents and supports our businesses to thrive

7.2 The Council launched the ‘Good Economy Recovery Plan’ in Autumn 2020 in response to challenges posed by Covid-19 to High Streets, Town Centres and individual businesses. Key priorities include:

- Re-opening and supporting high streets and town centres.
- Supporting businesses through recovery and into renewal; and
- Securing social and economic value through investment in neighbourhoods and communities.

7.3 This project seeks to invest in the physical environment to bring underutilised Council assets on the site into productive use through workspace and other uses. This will deliver a ‘good economy’ model – good jobs, greater fairness, recognising the link between health and wellbeing, business resilience and environmental sustainability.

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**

7.4 The Gourley Triangle will support the Place Priority by:

- Transforming the physical environment and public realm on the site, to deliver a safe, lively and welcoming place where people can have greater pride in their local area

- Building on the site's existing character and working closely with the existing community to ensure that the development reflects its local context
- Establishing a more connected place, linking into the Council's wider walking and cycling ambitions

Housing - a safe, stable and affordable home for everyone, whatever their circumstances

7.5 One of the Council's highest priorities is to deliver high quality council homes on council land. The project will provide secure, high quality and affordable housing as part of a new urban neighbourhood, delivering inclusive, mixed and sustainable communities with the right mix of tenures to meet local needs.

8. Statutory Officers comments

Finance

8.1 The recommendations of the report are to acquire properties within the site and in parallel to continue the design development of the scheme with a view to starting construction in August 2024.

8.2 The expenditure for the acquisition of the properties and the continued design development is to be met from the Strategic Acquisitions Fund (SAF) budget. Currently the SAF budget is set at £57.1m for this financial year with minimal expenditure and commitments of £3.1m against it. Therefore, there is sufficient budget available to fund the proposed expenditure as set out in Part B of this report. In agreeing to the recommendations of the report Cabinet will be committing a large element of this budget and this will need to be carried forward when the draft final outturn is considered by Cabinet later in the year.

8.3 The scheme has been subject to a viability study by an external expert which is set out in Part B of this report. The assessment at this stage is that the scheme is viable and provides a modest return for the Council. The project is currently estimated to make a surplus of £4m. This surplus takes into account the use of external grant. However, the achievement of a return is not the primary aim of the project for the reasons set out in the report.

8.4 The recommendations of the report allow for the acquisition of properties not currently in the Council's ownership. The estimated value of the properties and the associated compensation payable is set out in Part B. In the interim period between acquisition and start on site the Council will let the properties where possible. It is estimated that the income from the continued letting of the properties pending redevelopment will be £0.4m in the first year. It is likely that as the Council gets closer to the development phase that this income will reduce as tenants are relocated and letting the properties becomes increasingly difficult. This will be kept under review as part of the delivery of the scheme and when the project cash flows become clearer.

8.5 It is currently estimated, using the assumptions within this report, that when complete, the commercial element of the scheme will make a surplus of c.£0.338m per annum. Details of this calculation are contained in Part B of this report.

8.6 A new capital bid for the construction works will be submitted as part of the next MTFS. The estimated cost of the works, and hence the capital bid, are set out in Part B of this report. This capital bid will be a self-financing bid.

8.7 In the budget report elsewhere on the agenda there is a proposed change to the way in which interest is calculated for large capital projects, of which Gourley Triangle is one. This change means that the interest on the capital expenditure that is incurred between the start of the project and its end is deferred until the project is completed. It is estimated that for this project that during the land assembly phase that the deferred interest will be £0.384m. This deferred interest will become a project cost and has been factored into the estimated return set out above. During the project the Council will be obliged to continue to make the statutory minimum revenue provision (MRP). For the property acquisitions phase, it is estimated that the MRP is £0.331m in the first year and £0.340m in year two. This will be kept under review as part of the delivery of the scheme once the project cash flows become clearer.

8.8 The estimated MRP above can be funded from the income received from the rental of the properties prior to redevelopment which means that there is no pressure on the Council's revenue budget during the development of the project.

8.15 As with any development there are risks. Currently there are significant risks in relation to construction cost inflation and the ability to get contractors procured. There is also the risk that the development does not proceed. The first two risks will be managed through the Council's project management arrangements and the project contingencies. The risk of the development not proceeding will be assessed at key stages in the project. Should the risk of not proceeding with the project crystalise, then a range of mitigations are available to the Council such as continued long term rental of all or some of the properties through to disposal of all or part of the Council's property holdings.

Legal

8.16 Members should note that there has been no agreement as yet with any of the third-party landowners (other than the Metalcraft site) for the acquisition by agreement of their land interests. Separate delegated reports will be required in accordance with the delegated authority once these owners agree to sell their properties.

8.17 This report is seeking authority to acquire third party land interests within "the Site" for planning purposes. The Council has power contained in Section 227 of the Town and Country Planning Act 1990 to acquire land by agreement —

a.) if the authority think that the acquisition will facilitate the carrying out of development, re-development or improvement on or in relation to the land,
b.) is required for a purpose which it is necessary to achieve in the interests of the proper planning of an area in which the land is situated.

8.18 However, the Council must not exercise the power under paragraph 8.17(a) above unless the Council think that the development, re-development or improvement is likely to contribute to the achievement of any one or more of the following objects—

a.) the promotion or improvement of the economic well-being of their area;
b.) the promotion or improvement of the social well-being of their area;
c.) the promotion or improvement of the environmental well-being of their area.

8.19 The business case contained in this report sets out how the development will contribute to the objects above.

8.20 Under section 120 of the Local Government Act 1972 the Council can also acquire land by agreement for the purposes of—

a.) any of its functions under any enactment, or
b.) the benefit, improvement, or development of their area,

8.21 It is proposed that the properties acquired be used for their current purpose prior to any redevelopment. Under section 120 (2) of the Local Government Act 1972 the Council may acquire by agreement any land for any purpose for which it is authorised by any enactment to acquire land, notwithstanding that the land is not immediately required for that purpose; and, until it is required for the purpose for which it was acquired, any land acquired under that subsection may be used for the purpose of any of the Council's functions.

Legal (Contracts)

8.22 The contract for the multi-disciplinary team was procured via the LCP Professional Services DPS. This route is compliant with the Public Contracts Regulations 2015 (Reg 34) and with the Council's Contract Standing Orders (CSO 9.04 Dynamic Purchasing Systems). The Head of Legal and Governance (Monitoring Officer) has been advised that the original procurement included provision for RIBA Work Stage 2+ services.

8.23 The extension to the contract with Haworth Tompkins Architects will be a Key Decision as it is in excess of £500,000 and the Council therefore needs to comply with its governance processes in respect of Key Decisions including publication of the contract in the Forward Plan (CSO 3.01 (d)).

8.24 As the value of the contract extension is over £500,000, it falls to the Cabinet to approve the decision (CSO 10.02.1 (b)).

Procurement

8.28 Strategic Procurement acknowledgement the content of the report and will support future procurements noted in the paper.

8.29 The procurement of Haworth Tompkins Architects for Multidisciplinary services was conducted in line with the authorities Contract Standing Orders and the Public Contract Regulations. The provision of the option to extend the engagement to cover RIBA Work Stage 2+ is contained in the original procurement and can be executed.

Equality

8.31 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 protected characteristics and people who do not
- Foster good relations between people who share those characteristics and people who do not

8.32 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.

8.33 Although it is not enforced in legislation as a protected characteristic, Haringey Council treats socioeconomic status as a local protected characteristic.

8.34 It is not anticipated that the proposed acquisition programme and masterplan development will have a negative impact on any particular social group.

8.35 The decision progress the Masterplan will have positive implications for individuals with protected characteristics including through:

- Improvements to the public realm which deliver safety and health outcomes, with benefits for BAME groups and disabled people;
- Developing employment opportunities, with benefits for BAME people, young people;
- Opportunities to reflect local culture through commercial, community and creative projects, with benefits for BAME groups, young and old people

8.36 The decision will also have positive implications by advancing equality of opportunity for residents with protected characteristics. Delivery of new, high quality workspace will help to promote economic recovery from COVID-19, bringing positive benefits to individuals with protected characteristics who have experienced disproportionate negative impacts from COVID-19, including on employment and income.

8.37 Consultation on the Masterplan will continue to be inclusive, focussing on young people and underrepresented groups to ensure that future commercial, residential and public spaces are reflective of the local community.

9. Use of Appendices

Main Report (Part A):

1. Appendix 1 – Site Plan

Exempt Report (Part B):

2. Appendix 2
3. Appendix 3
4. Appendix 4
5. Appendix 5

10. Local Government (Access to Information) Act 1985

Background Documents

- **Tottenham Area Action Plan**
- **Cabinet Decision: Tottenham Future High Streets Fund**
- **Cabinet Decision: Metalcraft Acquisition and Masterplan Objectives**

The exempt part of this report is not for publication by virtue of paragraphs 3 and 5 of Part 1 of Schedule 12A of the Local Government Act 1972 as it contains information classified as exempt under Schedule 12A of the Local Government Act 1972 in that it contains information relating to the financial or business affairs of any particular person (including the authority holding that information) and information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.

In all the circumstances of the case, the public interest in maintaining the exemption outweighs the public interest in disclosing the information.

Appendix 1: Site Plan



Figure 4: Site Plan

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Report for: Cabinet – 8 March 2022

Title: Refurbishment of Support and Wellbeing Hubs

Report authorised by: David Joyce, Director of Housing, Regeneration and Planning

Lead Officer: Kurtis Lee, Director of Asset Management, Homes for Haringey

Ward(s) affected: Bounds Green, Alexandra, Seven Sisters, Tottenham Green, White Hart Lane, Northumberland Park

Report for Key/ Non Key Decision: Key decision

1 Describe the issue under consideration

1.1 This report requests Cabinet's approval for the award of a contract to contractor 2 to carry out internal communal refurbishment works to the following Support and Wellbeing hubs: Latimer House, Bigsbury Close, Hilldene Court, The Lindales, Sophia House, Lowry House and Palace Gates. The contract award will be for the sum of £763,426.12.

1.2 The report also requests Cabinet's approval for the issue of a letter of intent to the preferred contractor. This will be for an amount up to, but not exceeding, £76,342.61. This represents 10% of the contract sum and contingency sum. This will enable design work and specialist surveys to be completed, whilst the contract is finalised.

1.3 It is further recommended that Cabinet approves the professional fees of £44,811.81 which represents 5.19% of the contract sum.

1.5 Cabinet to note that the total project cost is as shown in the exempt report.

1.6 Details of the successful tenderer and the total project costs are outlined in appendix A (exempt information) of the report.

2 Cabinet Member introduction

2.1 The proposed works to the Support and Wellbeing hubs will result in improved modern facilities in the internal communal areas within the hubs. These improvement works will provide better spaces that are more welcoming and promote a sense of belonging, with good quality facilities, easily accessible and flexible space, enabling different uses and activities.

2.2 The works will comply with current fire and building regulations and the overall project will contribute to helping to achieve the Borough Plan objectives for inclusive, accessible housing for end users with flexibility in the use that delivers benefits to the local community and external agencies.

It would be my aspiration that when the works are completed at each hub that the resident's, and contractors, affected/involved are invited to cut a ribbon at each hub to celebrate the completion of the project. Refreshments to be provided.

3 Recommendations

Cabinet is asked:

3.1 In accordance with Contract Standing Order (CSO) 9.07.1(d), to approve the award of a contract to the preferred contractor identified in exempt appendix A. Works included within this project include the following: Redecoration, lighting and electrical works, flooring, window dressings, new kitchens and bathrooms, communal radiators and covers, laundry room alterations, communal furniture and renewing of the main entrance communal doors, to the Support and Wellbeing hubs. This will be for the sum of £763,426.12

3.2 To approve the issue of a letter of intent for an amount of up to, but not exceeding £76,342.61 which represents 10% of the contract sum.

3.3 To approve the total professional fees of £44,811.81 which represents 5.19% of the contract sum.

3.4 To approve the total project costs as shown in the exempt report. (Section 6.1).

4 Reasons for decision

4.1 Homes for Haringey requires Cabinet approval for the award of this contract, which is deemed to represent value for money. This is following a tender process undertaken in conjunction with Haringey Council's Procurement team via the Dynamic Purchasing Systems (DPS) from 'Principal Contractors' in the 'General Construction Multi-Trade for Housing & Residential' category.

4.2 The tender process was carried out in accordance with the procurement DPS requirements that incorporate price and quality. The successful compliant bidder scored the highest in relation to these criteria in the associated lot.

5 Alternative options considered

5.1 An alternative option would be for Homes for Haringey to use third party industry frameworks. Homes for Haringey sought support and advice from Haringey Strategic Procurement and determined Haringey Council's Dynamic Purchasing System 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 concentrate their resources in the local area.

5.2 A do-nothing option would mean the Council is not able to deliver necessary capital investment works to improve the communal spaces and

facilities of the Support and Wellbeing hubs, in accordance with the Asset Management Strategy 2020-25.

6 Background information

6.1 The Council currently has 23 Sheltered (supported housing) schemes. Of these, eight have been designated as a 'hub'. These offer an enhanced range of services that include the following: -

- Fully accessible communal area and facilities.
- Fully equipped kitchen for preparation of meals and snacks.
- Fully accessible toilets for disabled people.

6.2 The remaining Sheltered schemes are managed as part of a "cluster" of schemes from the designated hub. A hub centre has responsibility for co-ordinating a wide range of services across one or more satellite or ''spoke'' Sheltered schemes. The hub may provide core services that are not available in spoke centres.

6.3 Residents from all schemes, whether they reside in a hub or cluster scheme can access the various services offered. Examples of these include one-to-one key support and skills for life, including I.T. The overall purpose is to enhance residents' quality of living and allow them to remain independent.

6.4 Following the implementation of the new Support and Wellbeing hubs model in 2017, the service is working to: -

- Deliver a more bespoke, flexible service.
- Provide a more cost-effective service that benefits the residents in the scheme and the local community.
- Link services and working jointly across partners and agencies.
- Deliver a holistic service to promote active ageing and well-being through eight community hubs.

6.5 Homes for Haringey's planned Capital programme will fund this project, following a capital bid request to work on the specification and take forward the necessary improvement works to the Support and Wellbeing hubs. The intention is that each hub will undergo improvement works which creates spaces that are warm and inviting and facilitate individual interests, development and engagement with the wider community. Primarily, this will be achieved by improving the internal layout to make it accessible to all users, with good quality facilities that enable different use and activities to take place.

6.6 Homes for Haringey commissioned consultants Ridge and Partners LLP**, t**o carry out condition surveys to identify the refurbishment requirements for each Support and Wellbeing hub, to bring the internal facilities within the communal areas up to a modern standard. It was determined that the components listed in section 3.1 of this report were beyond their useful lifecycle and require replacement.

6.7 By undertaking the works in 3.1, will help to resolve the concerns raised regarding the quality of the communal facilities and equipment associated with the Support and Wellbeing hubs.

6.8 The project details are as follows: -

Number of Support and Wellbeing hubs	8
Anticipated start on site	May 2022
Anticipated completion	November 2022
Contractor	Details in Appendix A (exempt report)

6.9 The projects under consideration will be managed, designed and cost managed by Ridge and Partners and Homes for Haringey.

6.10 Tenders were subsequently invited in September 2021.

7 Consultation

7.1 Resident and key stakeholders, including Ward Members were consulted about these works in June and July 2017.

7.2 The next residents' newsletter, which is due to be issued in April 2022, will update residents, Ward Members and stakeholders and provide timelines for when works are expected to get underway.

7.3 Following Cabinet approval, resident and key stakeholders, including Ward Members will be updated on the project timetable and next course of action.

7.4 Prior to the commencement of the work, consultation with a focus on specific requirements will take place at each Supported and Wellbeing hub. This will incorporate written communication and a presentation of the works involved that includes an introduction to the site delivery team.

8 Leasehold implications

8.1 There are no Leaseholders that will contribute to this project.

9 Conservation areas

9.1 Two of the properties, Hilldene Court and Palace Gates are situated within conservation areas.

10 Contribution to strategic outcomes

10.1 This project will help to achieve the Borough Plan Outcome 3: 'We will work together to drive up the quality of housing for everyone'. This will include contributing to delivering the following objectives: -

- Contribute to the drive to improve the quality of Haringey's Council housing.

- Improve residents' satisfaction with the service they receive from Homes for Haringey to be in the top quartile for London (78%) by 2022.

- Ensure safety in housing of all tenures across the borough, responding to any new regulations as they emerge.

Statutory Officers comments (Director of Finance (including procurement), Head of Legal and Governance, Equalities)

11 Finance

The value of the contract is £0.808m and this includes a professional fee of £0.045m.

The named contractor was selected following a tender and evaluation process based on price 60%) and quality (40%).

The total cost of the works, including professional fees, is projected to be spent as shown below: -

Financial year	Works	Fees	Total
Up to 31/03/2022	£0.000m	£0.000m	£0.000m
2022/2023	£0.763m	£0.045m	£0.808m
Total	**£0.763m**	**£0.045m**	**£0.808m**

The projected expenditure including professional fees are contained within the capital works programme MTFS for 2022/23.

There will be no contribution to the cost of the works from leaseholders.

Further finance comments are contained in the exempt report.

12 Procurement

12.1 Strategic Procurement confirms the procurement have been undertaken in line with the Authorities Contract Standing Orders and the Public Contract Regulations 2015. Strategic Procurement approve the award of contract to Contractor 2 for a period of twenty six weeks and for the value of £763,426.

12.2 The value for money is demonstrated by reduced procurement costs (using council's DPS framework v/s OJEU advertised tender). The tender opportunity went out to 71 contractors under the 'General Construction Multi-Trade for Housing & Residential' category of which we received six compliant tender submissions. All compliant bids were assessed against the published evaluation criteria for quality (40%) and price (60%). 'Contactor x' was successful under the 'MEAT' (most economically advantageous tender) criteria.

12.3 This award is in compliance with clause 7.01b of the Contract Standing Orders.

13 Legal

13.1 The Head of Legal and Governance (Monitoring Officer) has been consulted in the preparation of this report.

13.2 The contract which this report relates to have been procured under the DPS General Construction Multi-Trade for Housing & Residential' category. This is compliant with the Public Contracts Regulations 2015.

13.3 Pursuant to Contract Standing Order 16.02, Cabinet has authority to approve the award of contract as referred to in the recommendations.

13.4 The Head of Legal and Governance (Monitoring Officer) sees no legal reasons preventing Cabinet from approving the recommendations in the report.

14 Equality

14.1 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.

14.2 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.

14.3 The decision will primarily impact residents living in properties managed by Homes for Haringey, among whom women, people with disabilities and BAME people are overrepresented. There is no indication that this decision will result in any foreseeable negative impacts on any individual or group that shares the protected characteristics.

14.4 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 and may have a disproportionate negative impact on any groups who share the protected characteristics.

15 Use of Appendices

15.1 Appendix A: Part A Exempt information.

16. **Local Government (Access to Information) Act 1985**

16.1 Asset Management Strategy 2020-25
https://www.homesforharingey.org/repairs-and-maintenance/major-works

16.2 In February 2018 Cabinet agreed to appoint Ridge and Partners LLP as multi-disciplinary professional consultants.
Award of contract for multi-disciplinary professional services
http://www.minutes.haringey.gov.uk/documents/s99594/

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Report for: Cabinet – 8 March 2022

Title: Revised Community Infrastructure Levy Charging Schedule

Report Authorised by: Rob Krzyszowski, Assistant Director Planning, Building Standards and Sustainability

Lead Officer: Bryce Tudball, Interim Head of Planning Policy, Transport & Infrastructure

Ward(s) affected: All

Report for Key/ Non Key Decision: Key Decision

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.

1.2. Haringey Council started charging the Mayor of London's CIL (Mayoral CIL) in April 2012[1] and subsequently 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 the Council initiated a review of its adopted CIL rates. Specialist consultants BNP Paribas were commissioned to prepare updated viability evidence for the Council which indicated that there was potential to increase certain CIL rates in certain parts of the east of the borough. Cabinet subsequently endorsed a partial review of the adopted CIL Charging Schedule (covering the Eastern Charging Zone only) and a Preliminary Draft Charging Schedule (PDCS) was published for consultation in March 2017 setting out proposals for increased rates in the south-eastern part of the borough. Having regard to representations received Cabinet agreed in October 2017 to defer consultation on the Draft Charging Schedule (DCS). In 2019 the Council started again to move forward with the partial review and in November 2019 Cabinet approved the DCS for public consultation which proposed to increase residential CIL rates across the whole Eastern Charging Zone. Following consultation on the DCS the Council made a small number of modifications to the DCS before submitting the Modified DCS (MDCS) for independent examination in September 2021.

1.4. In January 2022 the Council received the independent Examiner's report on the MDCS. The report concluded that the proposed revised rates in the MDCS provide an appropriate basis for the collection of the levy in the borough and will

[1] Since superseded by 'Mayoral CIL 2' which took effect in April 2019 and has been taken into account in setting the revised Haringey rates

not put the majority of developments at risk, and that the MDCS can be recommended for approval subject to one minor modification (affecting wording in MDCS rather than the revised rates contained within it).

1.5. Having regard to the Examiner's report a Revised Charging Schedule has been prepared for approval by the Council. This incorporates:

- The rates within the MDCS which were found by the Examiner to be an appropriate basis for the collection of the levy in Haringey;
- The minor modification recommended by the examiner; and
- Updating of CIL rates in the Western and Central Charging Zones to reflect indexation / inflation (which automatically applies to CIL rates) since 2014 which is required in order that the Revised Charging Schedule reflects current indexed rates at the point of approval.

1.6. The recommended effect date of the Revised Charging Schedule is 1 September 2022. Planning permissions on or after this date would be subject to the rates contained within the schedule.

1.7. Once the Revised Charging Schedule takes effect the CIL rates in the Eastern CIL Charging Zone will change as follows:

- residential rate will increase from £15 per square metre (psm) to £50 psm
- student accommodation rate will increase from £15 psm to £85 psm
- Build to Rent rate will increase from £15 psm to £100 psm

1.8. The effect of increased rates is that the Council will be able to raise more money from new development in the east of the borough to help fund new and improved infrastructure in Haringey.

2 Cabinet Member Introduction

2.1 New development in the borough must be the right development for Haringey and make a positive contribution to the local area. The Council's Borough Plan set out to bring in external funding and use CIL to achieve maximum impact, and to secure investment from development to support the delivery of local physical and social infrastructure, for example school, community facility and park improvements. That is exactly what this proposed CIL rate increase does – securing more income from developers to fund local infrastructure for the benefit of Haringey's residents and businesses.

2.2 The Council's existing CIL Charging Schedule was approved over seven years ago in 2014 and was based on viability evidence from even earlier. In 2016 a review was initiated to establish whether the rates contained within it were still appropriate. The evidence indicated that there was potential to increase certain CIL rates in the Eastern Charging Zone and the Council therefore begun the process of seeking to amend the approved Charging Schedule. In 2017 the Council consulted on an initial proposal regarding increasing rates but further progress in this regard was put on hold until 2019 to ensure the deliverability of a number of strategic housing sites in Tottenham Hale (see paras 7.3 and 7.4). Once the risk to these sites was mitigated the Council recommenced the review with another consultation and then proceeded to an independent examination in late 2021.

2.3 In setting CIL rates the Council is required by national legislation and guidance to strike a balance between investment to support development and the potential effect on the financial viability of developments. In his report the Examiner concluded that the Council has reached an appropriate balance and considered that the proposed rates will not put the majority of developments in the borough at risk. He therefore recommended that the Council can approve the increased rates.

2.4 This report proposes to increase the CIL rates levied by the Council in the east of the borough for residential, student accommodation and build to rent housing. Until now, the CIL rate for residential development in the east of the borough has been £15 per square metre and this report proposes increasing it to £50 bringing it closer in line with residential rates elsewhere in the borough.

2.5 I endorse the proposed rates which will 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.

2.6 To ensure that affordable housing and other 'section 106' financial contributions from developments will not be jeopardized at a late stage in the planning process the revised rates are proposed to take effect on 1 September 2022. Developments in the immediate planning pipeline include Council-led housing schemes in the east of the borough. The grace period before the new rates take effect will ensure that the financial model of cross-subsidy to maximise affordable housing is not put at risk.

3 Recommendations

3.1 Cabinet is asked:

1) To note the Examiner's report on the examination of the partial review of Haringey's Community Infrastructure Levy Draft Charging Schedule, as modified set out in Appendix C of this report;

2) To note that Members of Strategic Planning Committee endorsed the Revised Community Infrastructure Levy Charging Schedule to take effect on 1 September 2022;

3) To consider and to recommend to Full Council that the Revised Haringey Community Infrastructure Levy Charging Schedule is approved and publicised as set out at Appendix D to take effect on 1 September 2022.

4 Reasons for decision

4.1 The increased CIL rates proposed in the CIL Eastern Charging Zone have been subject to an independent examination which found that they provide an appropriate basis for the collection of the levy in the borough and will not put the majority of developments at risk. The Examiner recommended that the Council may proceed to approve the amended rates subject to one minor modification.

The Council has incorporated this modification within the Revised Charging Schedule for approval.

4.2 The amended rates are recommended to take effect from 1 September 2022. The Partial Review has been underway since 2016 and the Council's intent to increase certain CIL rates in the east of the borough has been clear since 2017. The period between Council approval and the rates being given effect will allow the planning authority to ensure that affordable housing and other 'section 106' financial contributions from developments will not be jeopardised by the effect of the new CIL rates at a late stage in the planning process i.e. after extensive pre-application negotiations or after a Planning Sub Committee resolution but pending the conclusion of signed S106 agreements and issuing of formal planning permissions (which trigger CIL liability). This is balanced with the objective of not delaying the effect date too far into the future with the Council missing out on potential increased infrastructure funding.

5 Alternative options considered

5.1 The alternative options considered are:

- Option 1 – Not to approve the Revised Charging Schedule and cancel the partial review. The disadvantage of this would be that CIL rates and therefore the amount of financial contributions from developers for infrastructure would remain the same and would not be maximised. This option is rejected as the Examiner found that the rates in the Revised Charging Schedule provide an appropriate basis for the collection of the levy in the borough and will not put the majority of developments at risk.

- Option 2 – To bring the Revised Charging Schedule into effect earlier or later than the recommended 1 September 2022 date. An earlier effect date is rejected to allow the planning authority to ensure that affordable housing and other 'section 106' financial contributions from developments will not be jeopardized at a late stage in the planning process i.e. after extensive pre-application negotiations or after a Planning Sub Committee resolution but pending the conclusion of signed S106 agreements and issuing of formal planning permissions (which trigger CIL liability). Developments in the immediate planning pipeline include Council-led housing schemes in the east of the borough which would be liable to pay the increased CIL rate which could jeopardise the financial model of cross-subsidy to maximise affordable housing. A later effect date would minimise delivery risks for a greater number of schemes in the borough's pipeline however it would mean foregoing increased infrastructure contributions for a longer period. It is considered that an effect date of 1 September 2022 provides an appropriate balance between the various considerations and therefore the alternative options are rejected and not recommended.

6 Background information

<u>Haringey Local Plan</u>

6.1 Haringey's Local Plan makes provision for a minimum of 19,802 homes and an additional 23,800m^2 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 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') and its Infrastructure Funding Statement 2020/21 (the '20/21 IFS'). 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)

Setting CIL: infrastructure and viability evidence

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 development. It provides local authorities with an additional means of securing infrastructure contributions from developers.

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 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, para 10). 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.

6.6 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 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, para 17).

6.7 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 (PPG, para 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 it was not deemed necessary to re-do or update the infrastructure evidence in support of CIL, which was tested at examination and found to be sound. An update to the IDP 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 for the purpose of supporting the Council's partial review of the CIL Charging Schedule.

6.8 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 (PPG, para 20).

Haringey CIL

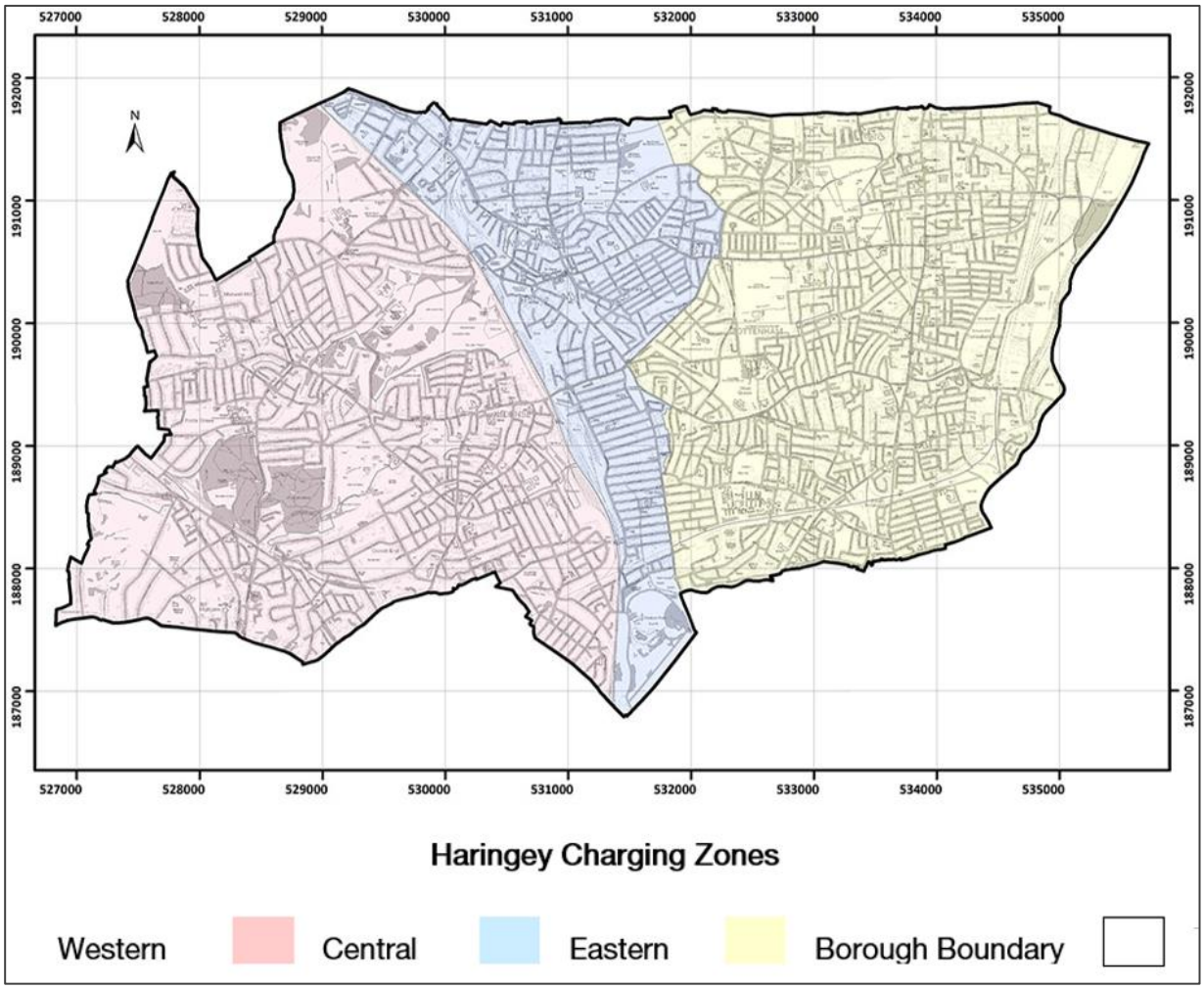
6.9 The Council approved the introduction of a local CIL in July 2014 and started charging on 1 November 2014. The rates together with the map showing the different charging zones are set out in the Council's existing adopted CIL Charging Schedule (Appendix A). The adopted rates are as follows:

Table 1: Adopted CIL Charging Schedule for Haringey (2014)

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

6.10 The map of the three geographical zones (Western, Central and Eastern) is shown below:



6.11 CIL charging rates are subject to automatic annual indexation for inflation therefore the current rates already charged by the Council are approximately 40% higher than the adopted rates in Table 1. The current rates are set out in the Council's CIL Annual CIL Rate Summary (Appendix B) as follows:

Table 2: Current Haringey CIL Rates automatically indexed for inflation (2022)

	CIL charge (£/square metre)		
Use	**Western**	**Central**	**Eastern**
Residential	£368.12	£229.21	£20.84
Student accommodation	£368.12	£229.21	£20.84
Supermarkets	£131.97		
Retail Warehousing	£34.73		
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 Partial Review of the CIL Charging Schedule

Initiation of Partial Review - Preliminary Draft Charging Schedule (PDCS) (2016-17)

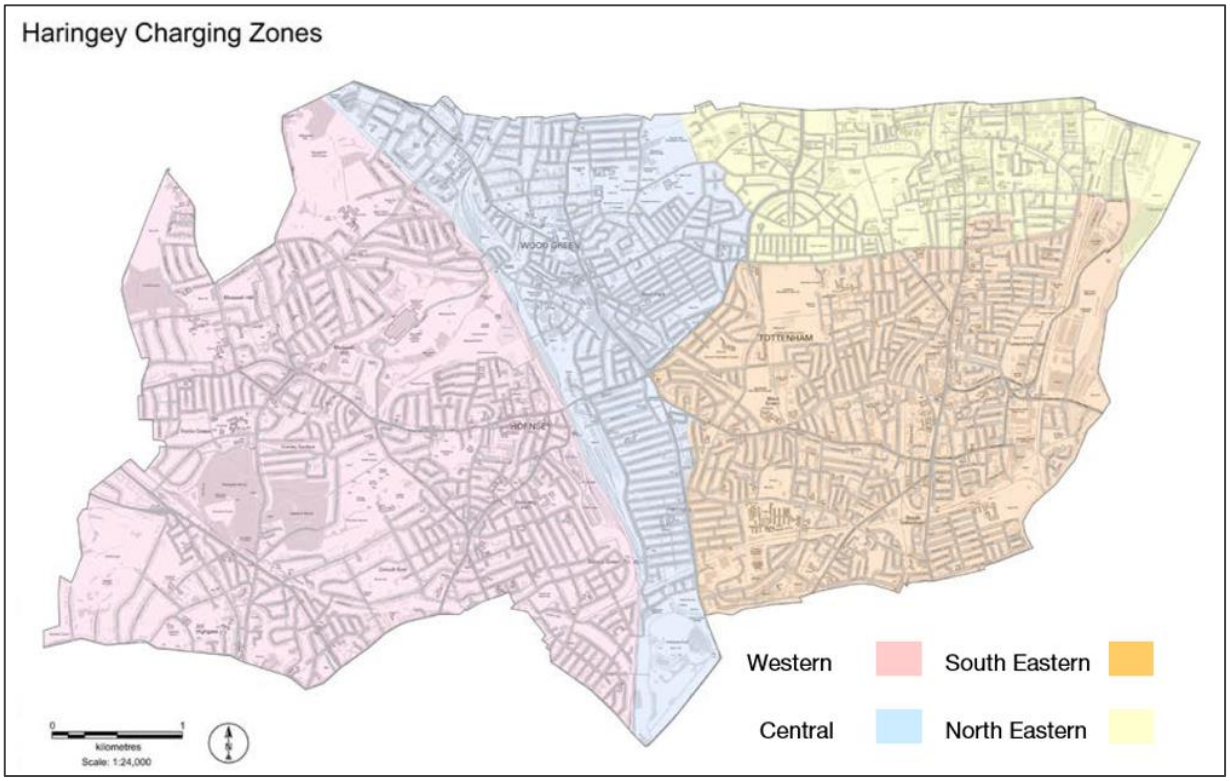
7.1 In 2016 the Council initiated a review of its adopted CIL rates. Specialist consultants BNP Paribas prepared updated viability evidence for the Council which indicated that there was potential to increase CIL rates in the south east of the borough. Cabinet subsequently endorsed a partial review of 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)

	CIL charge (£/square metre)			
Use	**Western**	**Central**	**South Eastern**	**North Eastern**
Residential	£265	£165	**£130**	£15
Student accommodation	£265	£165	**£130**	£15
Warehouse Living	**N/A**	**N/A**	**£130**	N/A
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 the Council's 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 of affordable housing within Tottenham Hale at risk of not being

deliverable. In 2019, once reserved matters applications had been determined on the three strategic development sites in Tottenham Hale and CIL liability notices had been issued based on the existing adopted CIL rates, officers considered that the viability risk to affordable housing had been satisfactorily mitigated and therefore recommenced the partial review.

Recommencement of Partial Review – Draft Charging Schedule (DCS) (2019)

7.5 The Eastern Haringey CIL Viability Update Study which supported the PDCS was finalised in December 2016. As it was three years old an update was commissioned to the study to establish whether the rates proposed in the PDCS were still viable. The affordable housing requirements which were tested in the original study were not in line with the Council's new preferences as set out in the revised Appendix C of the Housing Strategy 2017-2022 (adopted March 2019). Appendix C 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. Officers therefore instructed BNP Paribas to factor in the new preferred affordable housing tenures as part of the updated study. The purpose of this was to understand the impact the new affordable housing preferences had upon development viability and the consequential CIL rates which could be levied on residential development without putting affordable housing delivery at risk.

7.6 The updated viability work by BNP Paribas, finalised in October 2019, indicated it was possible for the Council to increase the rates for residential development and student accommodation.

7.7 BNP Paribas recommended that the Council introduce a flat rate charge of £50 per sqm for residential development in all wards of the Eastern Charging Zone.

7.8 BNP Paribas also analysed the viability of student accommodation in the Eastern Charging Zone and recommended there was potential to increase the charge from the current adopted rate of £15 per sqm to £85 per sqm.

7.9 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 London Plan 2021) can sustain a higher charge than standard residential development. BNP Paribas recommended that the Council introduce a new rate of £100 per sqm 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 recommended that the Council introduce a new rate of £130 per sqm for Warehouse Living (in line with what was proposed in the PDCS).

7.10 In light of the updated viability evidence and having regard to the relevant legal tests and national guidance, a DCS was prepared incorporating the following changes:

1) Increased the residential rate in the Eastern Charging Zone from £15 per sqm to £50 per sqm;

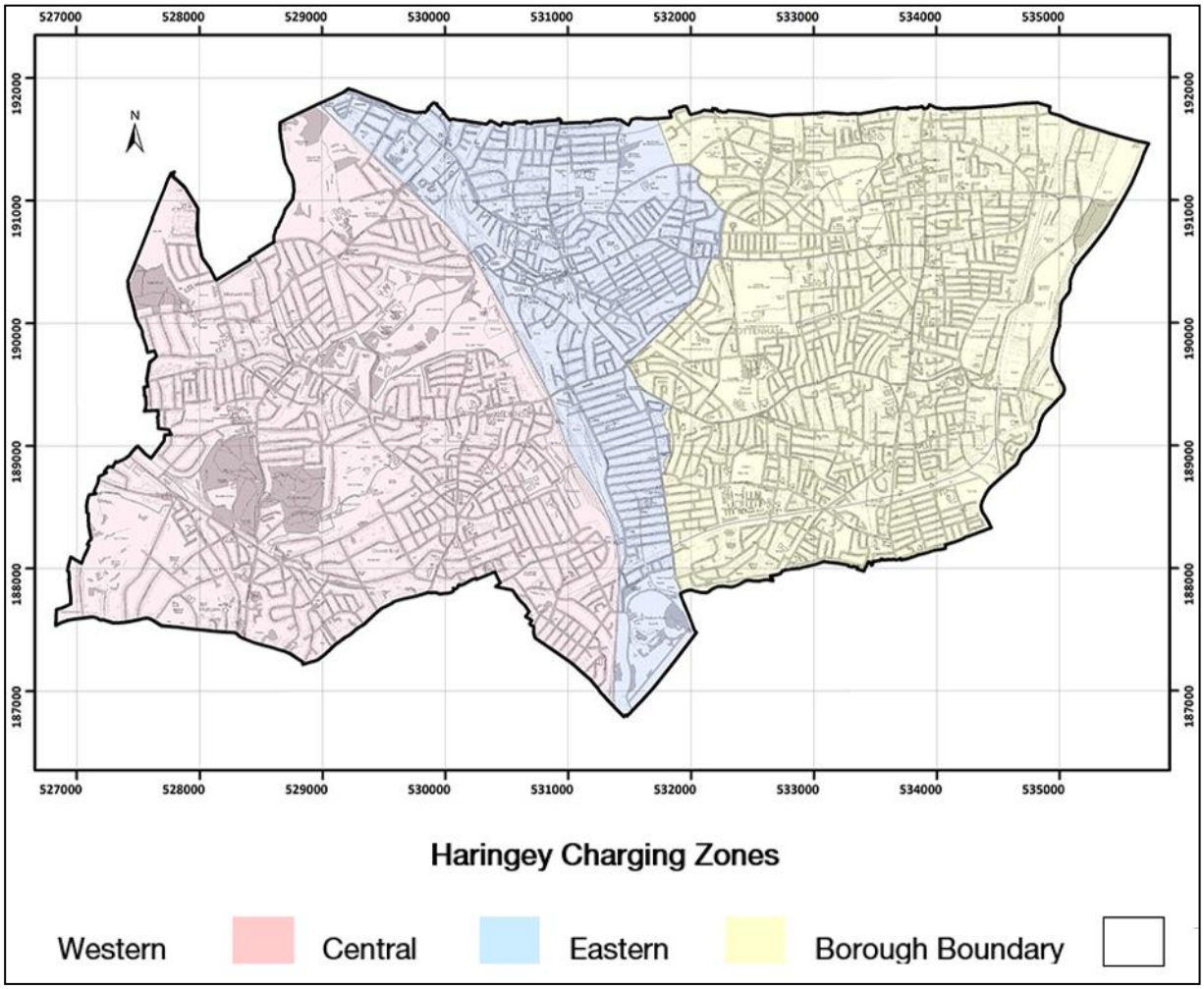
2) Increased the student accommodation rate in the Eastern Charging Zone from £15 per sqm to £85 per sqm;
3) Included a new charge for "Built to Rent" at £100 per sqm in the Eastern Charging Zone (the Built to Rent rate in the Western and Central Charging Zones would be amended so that it is in line with the existing residential rate for those zones).
4) Included a new charge for "Warehouse Living" at £130 per sqm in the Eastern Charging Zone.

7.11 In November 2019 Cabinet endorsed a DCS to this effect to be published for public consultation.

Table 4: Draft Charging Schedule (red shows changes proposed to the Council's adopted CIL Charging Schedule) (2019)

	CIL charge (£/square metre)		
Use	**Western**	**Central**	**Eastern**
Residential	£265*	£165*	~~£15~~ £50
Student accommodation	£265*	£165*	~~£15~~ £85
Build to Rent housing	£265*	£165*	£100
Warehouse Living	Nil Rate	Nil Rate	£130
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		

7.12 The map of the three geographical zones (Western, Central and Eastern) is shown below:



Public consultation on Draft Charging Schedule (DCS) (2019)

7.13 The Haringey CIL Draft Charging Schedule 2019 was published for public consultation from 18 December 2019 to 11 February 2020. A total of 14 representations were received.

Modification to Draft Charging Schedule (DCS) (2020-21)

7.14 Having regard to the issues raised in the representations the Council decided that the Warehouse Living charge proposed in the DCS did not meet the legal requirements relating to charge setting and it would also be contrary to the aims of policy DM39 in the Council's Development Management DPD which seeks to secure a long-term sustainable economic future for key Warehouse Living sites. As a result it, was decided that a necessary modification to the DCS was to delete the proposed Warehouse Living charge of £130 per sqm.

Submission of Modified Draft Charging Schedule (MDCS) for examination (2021)

7.15 On 27 September 2021 the Council submitted the MDCS for an independent examination. The appointed Examiner was Terry Kemmann-Lane.

7.16 Table 5 below sets out the rates in the submitted MDCS and highlights the changes proposed versus the Council's existing adopted schedule.

Table 5: Modified Draft Charging Schedule (red shows changes proposed to the Council's adopted CIL Charging Schedule) (2021)

	CIL charge (£/square metre)		
Use	**Western**	**Central**	**Eastern**
Residential	£265	£165	~~£15~~ £50
Student accommodation	£265	£165	~~£15~~ £85
Build to Rent housing	£265	£165	£100
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		

7.17 The map of the three geographical zones (Western, Central and Eastern) was unchanged from the previous stage.

7.18 The MDCS was subject to a four-week consultation period whereby any person could request to be heard by the Examiner in relation to any of the modifications proposed by the Council.

Examination of Modified Draft Charging Schedule (MDCS) (2021-22)

7.19 On 11 November 2021 the Examiner submitted questions to the Council arising from his examination of the submitted documents and the representations that were made. On 25 November 2021 the Council responded to the Examiner's questions.

7.20 On 16 November 2021 the Examiner submitted an additional question to the Council which the Council provided a response to on 19 November 2021.

7.21 On 24 December 2021 the Council was informed by the Programme Officer that the Examiner would not be holding a public hearing as part of his examination.

7.22 On 24 January 2022 the Council was issued with the Examiner's report on the examination of the Council's MDCS (Appendix C).

Report on the examination of the Modified Draft Charging Schedule (MDCS) (2022)

7.23 The Examiner's report on the MDCS contains his assessment of the Council's MDCS in terms of whether the schedule is compliant in legal terms and whether it is economically viable as well as reasonable, realistic and consistent with national guidance.

7.24 The report concluded that "in setting the CIL charging rates in the MDCS, and the DCS that went before it, the Council has had regard to detailed evidence on infrastructure planning and the economic viability evidence of the development market in the LBH. The council has been realistic in terms of achieving a reasonable level of income to address a gap in infrastructure funding, while ensuring that, in general, development remains viable across most of the eastern side of the borough…. An appropriate balance has been struck" (para 49).

7.25 The report found that: the legal requirements are met in terms of the Charging Schedule complying with national legislation/policy/guidance, including in respect of the statutory processes and an appropriate level of consultation; the proposed rates are informed by and consistent with the evidence on viability across the Eastern Zone of the borough, and it is supported by an adequate financial appraisal; it is consistent with the Local Plan, while not undermining its delivery (para 50). On the basis of the above, and subject to one modification the report recommended that the MDCS be approved by the Council.

7.26 In the report the Examiner drew the Council's attention to the fact that it appeared appropriate to delete a reference to outdated planning use classes 'A1-A5' (retail uses) in the MDCS. This follows substantial changes to the Use Classes made as part of the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 which came into force on 1 September 2020. In this regard, the Examiner included a proposed modification (EM1) as follows: "In the table of CIL rates, in column 1 under the heading "Use", within the development type "Office, Industrial, warehousing, small scale retail", delete the references in brackets to use class A1-5." This is a technical modification to remove reference to outdated planning use classes and does not affect the rates to be charged.

7.27 The examination of the MDCS only assessed increasing charging rates in the borough's Eastern Charging Zone. When the Council approves a new Charging Schedule, it approves the Schedule as a whole, which will include reference to the rates in the Western and Central Zones which have not been subject to review. However, these Western and Central Zone charges have automatically increased for indexation and inflation over time since the original Charging Schedule was adopted (as explained earlier in this report and in Table 2). To ensure these automatic increases over time are not 'lost' or 'reset' through the approval of the new Charging Schedule, the Council set out in its documentation and advised the Examiner that "rates that are not amended as part of the Partial Review of the CIL Charging Schedule 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 2022). The updated indexed figures will be provided as part of the final reviewed CIL Charging Schedule at the point of final approval." The Council published its Annual CIL Rate Summary 2022, dated December 2021, (Appendix B) which shows the automatic indexed rates that are currently applicable. The Council suggested that the Examiner may wish to recommend a modification now that the Council had the 2022 CIL figures. However, in his report the Examiner stated that since he had only been appointed to examine the Partial Review of the CIL Charging Schedule, it would be going beyond his my remit to make a recommendation about these revised figures but stated that "nevertheless, it was appropriate to draw my attention to the updated figures, and provide me with a copy of the new Annual CIL Rate Summary document that has been put on the webpage. It seems sensible for me to record here the council's intentions, for the sake of clarity". The following new rates will be inserted by the Council when it approves the rates:

Table 6: Indexed CIL rates as set out in Haringey Annual CIL Rate Summary 2022

Use	Western	Central
Residential		
Student accommodation	£368.12	£229.21
Supermarkets	£131.97	
Retail warehousing	£34.73	

Revised Charging Schedule for approval (2022)

7.28 Having regard to the Examiner's report a Revised Charging Schedule has been prepared for approval by the Council (Appendix D). This incorporates:

- The rates within the MDCS which were found by the Examiner to be an appropriate basis for the collection of the levy in the borough;
- The minor modification recommended by the Examiner; and
- Updating of CIL rates in the Western and Central Charging Zones to reflect indexation / inflation (which automatically applies to CIL rates) since 2014 which is required in order that the Charging Schedule reflects the current indexed rates at the point of approval.

Table 7: Revised Charging Schedule for approval

	CIL charge (£/square metre)		
Use	**Western**	**Central**	**Eastern**
Residential	£368.12	£229.21	£50
Student accommodation	£368.12	£229.21	£85
Build to Rent housing	£368.12	£229.21	£100
Supermarkets	£131.97		
Retail Warehousing	£34.73		

Office, industrial, warehousing, small scale retail	Nil Rate
Health, school and higher education	Nil Rate
All other uses	Nil Rate

7.29 The map of the three geographical zones (Western, Central and Eastern) is unchanged from the previous stage.

7.30 The geographical zones correspond to Haringey ward boundaries as at March 2022. When the borough's ward boundaries change in May 2022 the geographical zones will no longer precisely follow ward boundaries. This has no implications for the charging of CIL as a development is charged based upon the geographical zone that it is located in rather than the ward it is located in.

Effect date of Revised Charging Schedule

7.31 It is recommended that the Revised Charging Schedule takes effect on 1 September 2022 as set out within the document for approval at Appendix D. This means that developments granted planning permission on or after 1 September 2022 will be required to pay the rates contained within it. For the avoidance of doubt, where applications are subject to a Section 106 agreement, planning permission is not granted until the S106 agreement related to the planning application has been signed.

7.32 The proposed effect date of 1 September 2022 will allow the planning authority to ensure that affordable housing and other 'section 106' financial contributions from developments will not be jeopardised at a late stage in the planning process i.e. after extensive pre-application negotiations or after a Planning Sub Committee resolution but pending the conclusion of signed S106s agreements and issuing of formal planning permissions (which trigger CIL liability). This is balanced with the objective of not delaying the effect date too far into future with a consequent reduction in infrastructure funding.

7.33 An earlier effect date means that developments in the immediate pipeline including Council-led housing schemes in the east of the borough would be liable to pay the increased CIL rate. This could jeopardise the financial model of cross-subsidy to maximise affordable housing. A later effect date minimises delivery risks for a greater number of schemes in the borough's pipeline but means foregoing increased infrastructure contributions for a longer period.

7.34 It is considered that an effect date of 1 September 2022 provides an appropriate balance between the various considerations and therefore the alternative options are rejected and not recommended.

Implications of revised CIL rates

7.35 The Revised Charging Schedule contains increased CIL rates in the Eastern Charging Zone for residential, student accommodation and Build to Rent housing. The primary effect of this for the Council will be to increase CIL receipts versus

what would be collected if the current adopted rate was retained. This will increase available funding for new and improved infrastructure in Haringey.

7.36 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.

7.37 The increased CIL rates have potential to impact upon the viability of development schemes including those being brought forward by the Council. However, it should be noted that the rates were assessed by an independent Examiner who concluded that they provide an appropriate basis for the collection of the levy in the borough and will not put the majority of developments at risk. CIL normally accounts for only a small proportion of overall development costs (circa 1%) and therefore the proposed increase is unlikely to make the difference between a given scheme being viable and not viable. Social housing qualifies for relief from CIL therefore where Council housing schemes being brought forward are for Council housing only there is no additional CIL liability. Where Council housing schemes include an element of market housing the increased CIL rates will apply to that housing.

Strategic Planning Committee comments

7.38 Strategic Planning Committee was consulted on the proposals which are the subject of this report between 22 February 2022 and 28 February 2022. Members of the Committee endorsed the Revised Charging Schedule to take effect on 1 September 2022 without any changes for consideration.

CIL spending and reporting

7.39 The spending of CIL is not the subject of this report and does not form part of the recommendations. More information on spending and reporting on CIL is available at www.haringey.gov.uk/cil.

8 Contribution to strategic outcomes

8.1 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.

8.2 Priority 4 (Economy): CIL receipts are a key source of funding to support the delivery of local physical and social infrastructure.

9 Statutory Officer comments (Comments of Director of Finance (including procurement), Head of Legal and Governance, Equalities)

Finance

9.1 The report requests Cabinet to approve the recommendations as set out in Section 3 of this report.

9.2 There will be a potential increase in CIL income which would result in additional income to the authority. It is not possible at this time to be precise about the additional income that may arise as a result of the acceptance of the recommendation and the increase in CIL charges.

Procurement

9.3 There are no procurement implications arising from this report.

Legal

9.4 The Head of Legal and Governance has reviewed this report and comments as follows.

9.5 Section 6 of this report sets out the legal requirements/guidance to be followed/regard had to when revising the Council's Community Infrastructure charging schedule.

9.6 The Council's Constitution provides in Article 4.02 and Part Three that the Council's Community Infrastructure Levy charging schedule shall only be approved by Full Council and so Cabinet recommending that Full Council approve the charging schedule set out in appendix D to this report is a decision Cabinet can take in accordance with the Council's Constitution.

Equality

9.7 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.

9.8 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.

9.9 An increase in the CIL rate for residential development in the east of the borough has the potential to put the delivery of some housing schemes at risk including those which contain an element of affordable housing. 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, as demonstrated through the examination and accepted by the Examiner, any risk to affordable housing delivery has been minimised. 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.

9.10 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 approval of the Revised Charging Schedule a full EQIA is not required.

10 Use of Appendices

- Appendix A – Haringey CIL Charging Schedule 2014
- Appendix B – Haringey Annual CIL Rate Summary 2022
- Appendix C – Examiner's report on the examination of the partial review of Haringey's Community Infrastructure Levy draft charging schedule, as modified
- Appendix D – Revised Haringey Community Infrastructure Levy Charging Schedule

11 Background Papers

N/A

12 Local Government (Access to Information) Act 1985

12.1 Report to Cabinet (24 January 2017) seeking approval for consultation on the revised CIL rates, regulation 123 list, and the proposed new CIL governance arrangements: https://www.minutes.haringey.gov.uk/documents/s90555/CIL%2024.01.2017%2018.05.pdf

12.2 Report to Cabinet (17 October 2017) providing update on Community Infrastructure Levy Charging Schedule and Planning Obligations SPD: https://www.minutes.haringey.gov.uk/documents/s96913/CIL_Planning%20Obs%20SPD%20Cabinet%20Report%20021017%20003.pdf

12.3 Report to Cabinet (12 November 2019) on Community Infrastructure Levy Partial Review: Draft Charging Schedule consultation: https://www.minutes.haringey.gov.uk/documents/s112459/CIL%20DCS%20report%20Cabinet%20Oct%202019%20V15.pdf

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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



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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 m^2 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

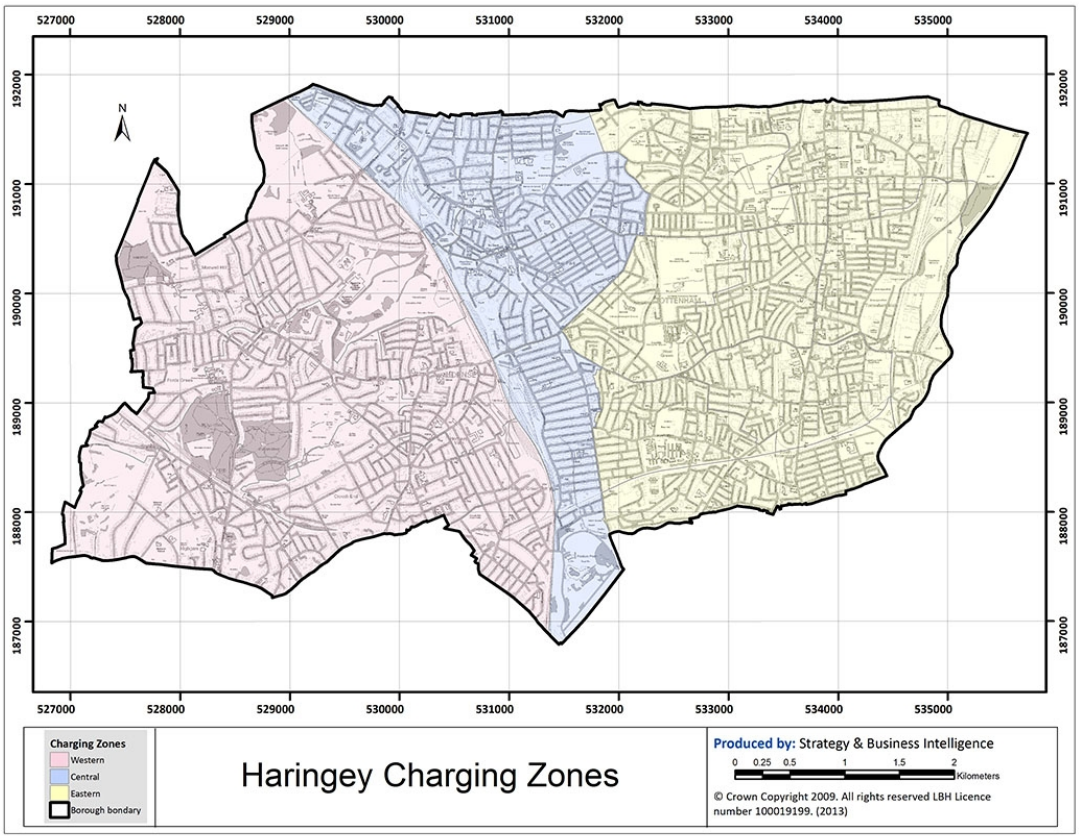
Viability in Haringey

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
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.
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

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 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

<u>Strategic Proportion</u>

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.

<u>Neighbourhood proportion</u>

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/m^2 on behalf of the Mayor for any development that falls within scope of the regulations.

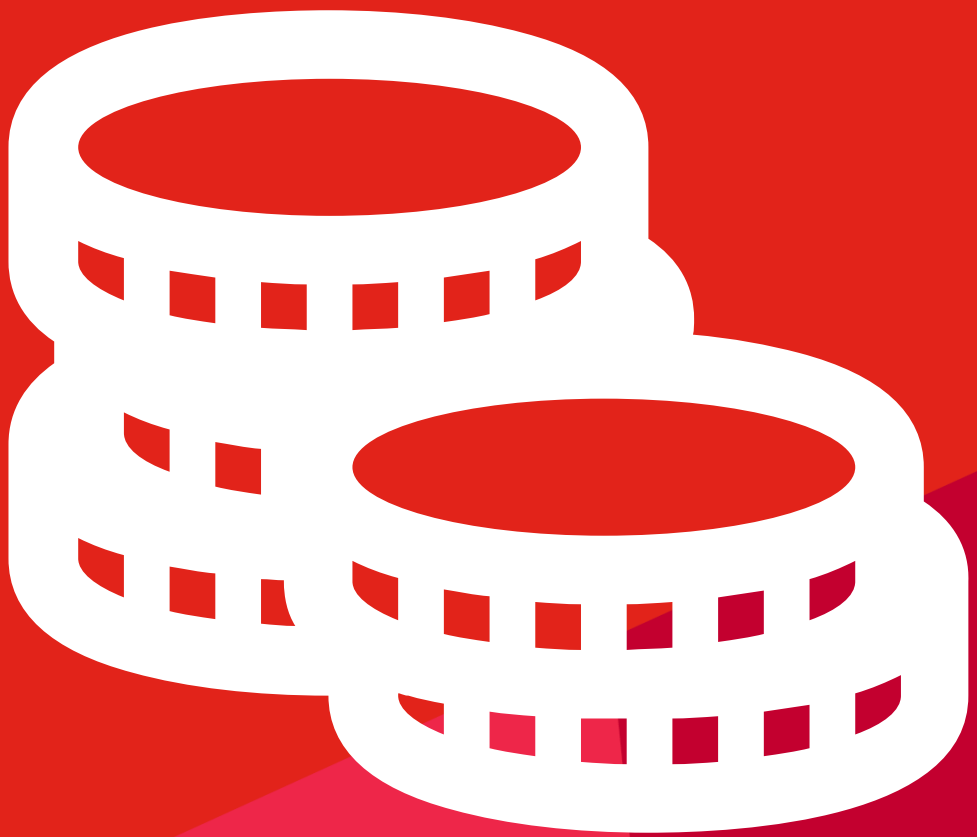
Monitoring and Reporting on CIL

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.

2022

CIL Charging Schedule including Annual CIL Rate Summary



December 2021
haringey.gov.uk

Haringey LONDON

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What is Community Infrastructure Levy (CIL)?

The Community Infrastructure Levy (CIL) is a charge based on the floorspace of new buildings to help fund infrastructure needs arising from new development

What is this document?

Regulation 121C of the CIL Regulations 2010 requires the Council to publish an Annual CIL Rate Summary every December for the next calendar year

The Annual CIL Rate Summary must show how the adopted CIL Charging Schedule rates have been 'indexed' for inflation over time. CIL rates are 'indexed' for inflation using the Royal Institution of Chartered Surveyors (RICS) 'CIL Index' which is now published in October every year

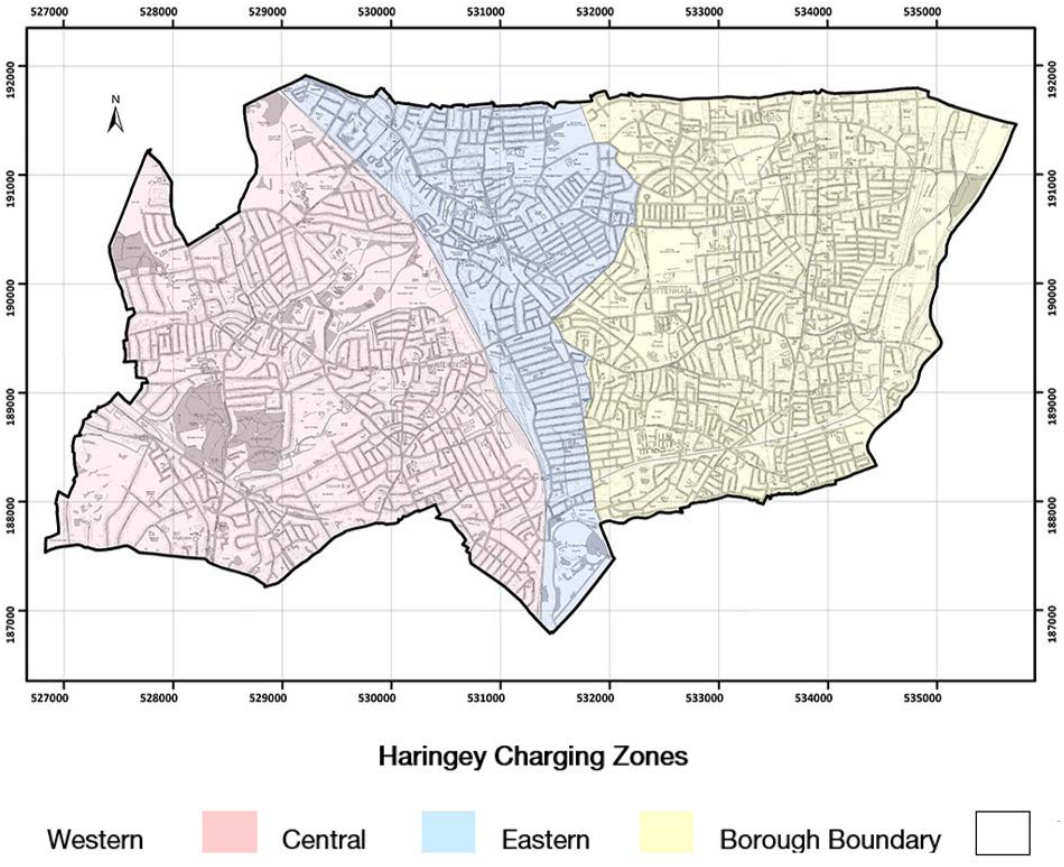
For simplicity, this document sets out the CIL Charging Schedule and the Annual CIL Rate Summary together



Haringey CIL Charging Schedule 2014

The Charging Authority	London Borough of Haringey
Date of Approval	21 July 2014
Date of Effect	1 November 2014
Calculating the Chargeable Amount	Calculated in accordance with Schedule 1 of the CIL Regulations 2010
Statutory Compliance	The Charging Schedule was issued, approved and published in accordance with the CIL Regulations 2010 and Part 11 of the Planning Act 2008
Rates	The rates (expressed as pounds per square metre) are set out in the table below:

<table>
<tr><th>Use[1]</th><th>Western</th><th>Central</th><th>Eastern</th></tr>
<tr><td>Residential
Student accommodation</td><td>£265</td><td>£165</td><td>£15</td></tr>
<tr><td>Supermarkets</td><td colspan="3">£95</td></tr>
<tr><td>Retail warehousing</td><td colspan="3">£25</td></tr>
<tr><td>Office, industrial, warehousing, small scale retail (use class A1-5)
Health, school and higher education
All other uses</td><td colspan="3">Nil rate</td></tr>
</table>



[1] 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

Haringey Annual CIL Rate Summary for 2022

The Charging Authority	London Borough of Haringey
Annual CIL Rate Summary Year	2022
Date of Effect of Charging Schedule	1 November 2014
Rates	The rates (expressed as pounds per square metre) are set out in the table on the previous page
Index figure (I_C) for calendar year Charging Schedule took effect	239
Index figure (I_Y) for calendar year for Annual CIL Rate Summary 2022	332
Indexed rates	The indexed rates (expressed as pounds per square metre) are set out in the table below:

Use[2]	Western	Central	Eastern
Residential Student accommodation	£368.12	£229.21	£20.84
Supermarkets	£131.97		
Retail warehousing	£34.73		
Office, industrial, warehousing, small scale retail (use class A1-5) Health, school and higher education All other uses	Nil rate		

[2] 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

Mayor of London's CIL

The Mayor of London's CIL Charging Schedule (Mayoral CIL 1 or 'MCIL1') took effect in April 2012 and this was superseded by a new CIL Charging Schedule (Mayoral CIL 2 or 'MCIL2') in April 2019, both covering the whole of London.

The Charging Authority	Mayor of London
Date of Effect of Charging Schedule	MCIL1 1 April 2012 MCIL2 1 April 2019
Index figure (I_C) for calendar year Charging Schedule took effect	MCIL1 223 MCIL2 330
Index figure (I_Y) for calendar year for Annual CIL Rate Summary 2022	332

Indexed rates The indexed rates (expressed as pounds per square metre) are set out in the table below:

Use	MCIL1	MCIL1 Indexed	MCIL2	MCIL2 Indexed
Development used wholly or mainly for the provision of any medical or health services except the use of premises attached to the residence of the consultant or practitioner	Nil	Nil	Nil	Nil
Development used wholly or mainly for the provision of education as a school or college under the Education Acts or as an institution of higher education	Nil	Nil	Nil	Nil
All other uses in Zone / Band 2 which Haringey falls within	£35	£52.11	£60	£60.36

For further information please contact

cil@haringey.gov.uk

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Report to the London Borough of Haringey

By Terrence Kemmann-Lane JP DipTP FRTPI MCMI
An Examiner appointed by the Council

Date: 24 January 2022

PLANNING ACT 2008 (AS AMENDED)
SECTION 212(2)

THE LONDON BOROUGH OF HARINGEY
COMMUNITY INFRASTRUCTURE LEVY

REPORT ON THE EXAMINATION OF THE PARTIAL REVIEW OF THE COMMUNITY INFRASTRUCTURE LEVY DRAFT CHARGING SCHEDULE, AS MODIFIED

Charging Schedule submitted for examination on 27 September 2021 through Penny O'Shea Consulting

POC

Non-Technical Summary
This report concludes that the London Borough of Haringey Community Infrastructure Levy Partial Review Modified Draft Charging Schedule provides an appropriate basis for the collection of the levy in the borough. The proposed rates will not put the majority of developments at risk, and it can be recommended for approval. A minor modification is required to reflect changes in the Use Classes Order.

Introduction

1. Under Regulation 19(4) of the CIL Regulations 2010 (as amended), the council may modify the CIL Draft Charging Schedule following publication and consultation. The council published the Modified Draft Charging Schedule (MDCS) in response to representations made to the Draft Charging Schedule (DCS) during the period of public consultation from 18 December 2019 to 11 February 2020. It was the MDCS that was submitted to me on 27 September 2021, although the consultation period on it continued until 25 October 2021.

2. I am a chartered Town Planner, being a Fellow of the Royal Town Planning Institute. I have many years' experience of holding public inquiries and examining local plans, and have been examining CIL proposals for planning authorities since 2013.

3. This report contains my assessment of the London Borough of Haringey's (LBH) CIL Partial Review MDCS in terms of Section 212 of the Planning Act 2008. It considers whether the schedule is compliant in legal terms and whether it is economically viable as well as reasonable, realistic and consistent with national guidance (Department of Levelling Up, Housing, and Communities on CIL).

4. In the responses to the consultation on the November 2019 DCS, a limited number of representations made reference to possible attendance at a hearing. As I proceeded with my examination, I found it necessary to raise questions with the council to seek further clarification following the points made by representors, and gradually moved towards the view that the examination could be dealt with on the basis of the written submissions, and that there would be no need to hold a hearing. In November 2021, I therefore requested my programme officer to write to representors asking if there was a wish to attend a hearing. There was no response seeking a hearing from any representor to this request. I therefore decided that the examination could be conducted on the basis of the written submissions and informed the council accordingly.

5. To comply with the relevant legislation, the local charging authority has to submit a charging schedule that sets an appropriate balance between helping to fund necessary new infrastructure and the potential effects on the economic viability of development across its area.

6. The current LBH CIL Charging Schedule came into effect on 1 November 2014. It set rates for residential, student accommodation, supermarkets, and retail warehousing across three charging zones, within which some of the rates vary. Since the current schedule came into force, a number of large developments within and around the Tottenham Hale and North Tottenham growth areas, and in Seven Sisters, have been completed. Linked to this regeneration of the eastern part of the borough, there has been a significant growth in residential values.

7. As a consequence, the council commissioned BNP Paribas Real Estate (BNPPRE) to produce a partial review of the residential and student accommodation rates in the Eastern CIL Zone of the approved CIL Charging Schedule, as well as to consider a rate for two new forms of residential accommodation: Warehouse Living (WL) and the Private Rented Sector (PRS). The latter is referred to in the submitted Draft Charging Schedule (DCS) as 'Build to Rent Housing' (BTR). These forms of accommodation have only come forward in the borough since 2014 and consequently were not specifically included within the approved CIL Charging Schedule. The result of this commission was the Community Infrastructure Levy: Eastern Haringey Viability Update Study (EHVUS), dated October 2019. The EHVUS was accompanied by a separate volume of appendices setting out the results of the appraisals of a range of development typologies.

8. The EHVUS considered the residential and student accommodation rates approved in the Eastern CIL Zone and the potential rates for WL and PRS schemes, in combination with the cumulative impact of the requirements of the council's Local Plan, adopted July 2017 (comprising the Strategic Policies DPD, Development Management DPD, Site Allocations DPD and Tottenham Area Action Plan DPD). Upon review of the representations made on the DCS, the council commissioned a further assessment from BNPPRE of the proposal to levy a charge on WL.

9. In light of the evidence provided in the representations and the advice contained in the 'Note on Warehouse Living' provided by BNPPRE (document HCIL6), the rates for WL are proposed to be deleted, and the council published a Statement of Modifications to achieve this. There were no adverse comments in the representations on the modifications, and I accept that, on the basis of the current knowledge and experience of WL, there is no evidence which would support a charge on this form of development as it is now emerging. I will briefly refer to this below in support of my recommendations.

10. The other modification that the council proposed was to amend the definition of Build to Rent Housing, set out at the bottom of the schedule, and to remove the word 'Draft' in front of London Plan and add '2021', so that it reads 'the London Plan 2021'. Clearly, this is simply a factual update, which I will recommend is made to the final approved schedule.

11. It is important to note that, since this was a partial review, the rates applicable in the Western and Central Charging Zones, and those that are borough wide, have not been reassessed. Nevertheless, the rates in these Zones have changed over time due to the indexing for inflation in accordance with the CIL Regulations 2010 (as amended). Thus, the rates in

the Western and Central Zones for both residential and student accommodation have increased so that by 2020 they had changed from £265 (western) and £165 (central) to £370.33 and £230.59 respectively. In the MDCS the rates for these two charging zones, and the borough-wide charges for Supermarkets and Retail Warehousing, have an '*' beside them. A footnote explains that, at the date of final approval of the MDCS, the updated indexed figures will be provided in the approved Charging Schedule in place of those in the MDCS. (See also paragraphs 46 to 48 below).

12. I have explained in the immediate above paragraph that the submitted MDCS takes account of the partial review of the 2014 Schedule, which only considered the rates in the Eastern Charging Zone. I also explained how the council will deal with the updating of the rates in the other two charging zones to account for indexation. For ease of reference, therefore, I will set out only the charges now proposed in the Eastern Charging Zone.

13. In the 2014 Schedule there were only two forms of development that had CIL rates specific to the Eastern Zone – Residential and Student accommodation. These were both charged at £15 per m^2. It is now proposed that these will be charged at £50 and £85 respectively. There were also borough-wide rates for Supermarkets and Retail warehousing at £95 per m^2 and £25 per m^2 respectively. In addition, it is now proposed to introduce a separate use category of Build to Rent housing. This particular development form was previously incorporated within the Residential charge. It has only come forward in the borough since 2014 and consequently was not specifically included within the approved CIL Charging Schedule. For the Western and Central Charging Zones, Build to Rent will have the same rates as Residential, similarly being re-indexed at the point of the schedule approval. Therefore, the only changed charge for Build to Rent is in the Eastern Zone which is introduced at £100 per m^2.

14. To be clear, therefore, the only matters for me to consider, in terms of levy rates, are those in the Eastern Zone, with Residential increasing from £15 per m^2 (now indexed to approximately £21) to £50 per m^2; Student accommodation from £15 per m^2 to £85 per m^2; and Build to Rent moving from the Residential rate to £100 per m^2.

Were the rates adequately consulted upon?

15. The council consulted on the November 2019 DCS for 8 weeks between Wednesday 18 December 2019 and Tuesday 11 February 2020, as required by Regulation 17 of the CIL Regulations 2010 (as amended). The DCS and accompanying documents were made available for inspection on the council's website, at the council's principal office and at the borough's libraries. A local advertisement was published on 18 December 2019, and representations were invited from consultation bodies and other persons and bodies considered appropriate by the council via its database. There were 14 representations received in response.

16. The council published the Statement of Modifications, in accordance with Regulation 19(1)(d), that responded to the representations received to the DCS. This Statement was sent to each of the persons that were invited to make representations on the DCS and a copy of the Statement was

published on the council's website. The period of consultation was for 4 weeks, closing on Monday 25 October 2021. There were two representations submitted as a result of this consultation.

17. I consider that these arrangements for consultation on the DCS and the Statement of Modifications were adequate and met the requirements of the Regulations referred to. In reaching my conclusions, I have taken into account the representations made in response to the November 2019 DCS and those in respect of the Statement of Modifications.

Is the Charging Schedule supported by background documents containing appropriate available evidence?

Do the Infrastructure Delivery Plan and Infrastructure Funding Statement 2019/20 (December 2020) support the continued charging of CIL?

18. The Haringey Infrastructure Delivery Plan, Update April 2016 (IDP) is part of the evidence base used to support the submission of the DCS, meeting the requirements of the National Planning Policy Framework (the Framework) and PPG at that time. It was based on the requirements set out in the London Borough of Haringey Local Plan: Strategic Policies, approved in March 2013. That document sets out how the council will deliver local and strategic development needs including housing, employment, leisure and retail provision. The Further Alterations to the London Plan (2015) identified a new annual housing target for Haringey of 1,502 new homes for the period between 2011 and 2026. This creates an overall housing requirement of 19,802 new homes from 2011-2026. To achieve these requirements, it is important to ensure that appropriate infrastructure is provided to make places attractive, sustainable and successful.

19. The first iteration of the IDP was the Community Infrastructure Study (2010), produced as part of the preparation of the Local Plan: Strategic Policies. This was followed by the IDP Update 2013 to support the introduction of the Haringey CIL that became effective in 2014. The IDP Update 2016 is a further update, with a view to understanding the infrastructure requirements of the post-2015 housing target.

20. Section 13 of the IDP sets out the Total Infrastructure Funding Gap by sectors. Within this section, Table 6 summarizes the potential cost of providing the infrastructure requirements outlined in the 2013 document. The figures in the table are from 2013, indexed using BCIS indexation[1] to bring them to April 2016 prices. The final row of Table 6 identifies totals: Investment required - £534.4m; Funding available - £185.7m; Funding Gap - £348.6m.

21. With the removal of the requirement for a Regulation 123 list in an amendment of the CIL Regulations on 1 September 2019, there is a requirement for an Infrastructure Funding Statement (IFS) to be published by December every year from 2020 onwards. The council has produced a 2019/2020 Infrastructure Funding Statement. The IFS should identify infrastructure needs, the total cost of this infrastructure, anticipating funding

[1] Building Cost Information Service published by the Royal Institute of Chartered Surveyors.

from developer contributions, and the choices the authority has made about how these contributions will be used (PPG CIL paragraph 017).

22. In section 1.4 of the IFS, it is explained that it is based on the approved Local Plan and the IDP (referred to in paragraphs 18 to 20 above). The infrastructure needs of the following categories are considered: education; health; libraries and museums; open space, leisure and sport; transport; waste facilities; surface water management measures; water quality; electricity network; decentralised energy infrastructure; and emergency services.

23. Section 2.4 sets out the policy and guidance on spending Strategic CIL, how the council goes about this and CIL spending criteria and allocations. In December 2020, approval was given for £14.6m of Strategic CIL monies and the capital programme is set out. Section 2.5 sets out spending on Neighbourhood CIL in a similar way. The third section of the IFS deals with section 106 planning obligations and includes the report for the year 2019/20 required by Regulation 121A(c) of the CIL Regulations, both monetary and non-monetary.

24. Taking the information in the two documents, the IDP shows that the total investment required for infrastructure is £534.4m, whilst available funding from non-CIL sources is anticipated as £185.7, leaving a funding gap of £348.6m. The table at paragraph 2.3.1 of the IFS shows that over the 5 years from 2015/16 to 2019/20 the total value of CIL collected was £18.892m (figures rounded), whilst total expenditure for 2019/20 was £2.845m and retained receipts were £16.048m. From these figures it can be seen that a very significant funding gap will remain with the application of CIL receipts to the gap of £348.6m referred to above, although CIL will make a small but valuable contribution to the provision of infrastructure in the borough. The figures demonstrate the continuing need to levy CIL in LBH.

25. I should also mention at this point that there were representations about the need to update the IDP. The IDP is not before me for examination, therefore those comments are for the council to consider.

Does the economic viability evidence support the proposed levels of CIL?

26. Since the CIL Charging Schedule in LBH was first implemented in 2014, the rates have been well embedded in policy and the land market of the borough. As noted in paragraph 6 above, since CIL 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 LBH, there has been a significant growth in residential values.

27. Thus it was that the council commissioned the EHVUS, published in October 2019, from BNPPRE. This review was to reconsider the residential and student accommodation CIL rates in the Eastern CIL Zone of the approved CIL Charging Schedule as well as to consider a new rate for WL and BTR. The review therefore sought to establish whether there is scope for the two

existing development types, residential and student accommodation, in the Eastern CIL Zone to viably contribute an increased level of CIL, and whether WL and BTR schemes in the east of the borough can viably contribute through CIL towards the delivery of the necessary supporting infrastructure.

28. The EHVUS uses a standard approach, the residual valuation method, that involves calculating the value of completed development schemes and deducting development costs (construction, fees, finance, sustainability requirements, CIL [including Mayoral CIL] and other plan policy costs) 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 the amount available for site acquisition. The residual land values are compared to a 'Benchmark Land Value', being the value above the existing use value a reasonable landowner would accept, including a premium as an incentive to sell, to bring the site to market for development. As I have said, this is a standard industry approach to viability studies, and I find that, in principle, this study is satisfactory. I set out below the gist of the findings of the EHVUS.

Residential development

29. Residential schemes in the Eastern CIL Zone have been tested with a range of affordable housing tenures and percentages, taking into consideration a balance of the council's current affordable housing policies target requirement and the aspirations to deliver a wider range of affordable housing tenures in the borough. In brief, the results of the EHVUS were as follows:

    - Some scenarios (e.g. certain affordable housing percentages) are unviable prior to the application of CIL in the appraisal. Where schemes are viable, the recommended CIL rates are sufficiently modest to ensure that schemes remain viable.

    - The results of the appraisal of residential developments shows a wide range of potential maximum CIL rates. The recommended increase is to a rate of £50 per m^2 in the Eastern CIL Zone.

    - The recommended rate is set at a discount to the maximum rate, in line with the requirements set out in the National Planning Policy Framework. Consequently, there is sufficient flexibility for schemes to be able to withstand the impact of economic cycles over the life of the Charging Schedule; although in any event, current mainstream forecasts are that residential values will increase over the next five years. The proposed rate amounts to between 1% and 1.6% of development costs and is therefore set at a nominal level.

Private rented sector

30. There are a number of PRS (BTR in the DCS) which have been delivered/are currently coming forward in the Eastern CIL Zone in particular. A charge of £100 per m^2 for PRS schemes delivered in the Eastern CIL Zone is recommended, reflecting a 20% buffer from the maximum charge of £125 per m^2. The proposed CIL amounts to circa 4% of development costs, which

at below 5%, experience shows is not a determining factor in a developer's decision as to whether or not to proceed with a development.

Student accommodation

31. Student housing developments in the Eastern CIL Zone 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. A charge of £85 per m^2 is recommended. This is based on the delivery of at least 40% affordable student accommodation within schemes and allows for a buffer from the maximum rate, and would amount to circa 2.25% of development costs.

Warehouse living

32. The EHVUS noted the council's Policy DM39: 'Warehouse Living', which 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 appraisals identified that such schemes generate significant residual land values in excess of existing use values. There will be differences from site to site with respect to conversion costs and quality, but some of this space may not qualify for CIL if such schemes do not add any floorspace and/or the floorspace has been lawfully occupied for six months in the last three years. A charge of £130 per m^2, which reflects a significant discount from the maximum, is recommended. This rate of charge is unlikely to have an impact on a developer's decision to deliver such schemes.

The council's response to the EHVUS

33. The council accepted these recommendations and published the DCS which, as mentioned in paragraph 15 above, it consulted on between 18 December 2019 and 11 February 2020. The outcome of this consultation was that 14 representations were received. A number of these did not raise issues with the level of charges proposed, mainly dealing with the contents of the IDP. However, representors were concerned with the rise in the rate for residential developments, mainly on the basis of the balance to be struck between securing adequate infrastructure and policy compliant affordable housing. I deal with these matters a little later in this report.

34. More relevant at this stage is to refer to the representations that were made with regard to the proposed charge for WL. In brief, these were that WL is evolving and the evidence in the EHVUS does not indicate a proper understanding of this form of development, and in particular, does not account for demolition and new build costs. As a result, the council commissioned a 'Note on Warehouse Living' from BNPPRE, dated 23 April 2021, to address the representations. This note acknowledged that the assessment of WL schemes in the EHVUS had been based on a refurbishment development, and that in the 18 months following that study, a redevelopment approach had started to be pursued. The conclusions and recommendations in the note were that the evidence presented for such schemes in a rapidly evolving situation does not provide an appropriate basis to set a CIL charge for new Purpose-Built WL schemes. With the aim of

Policy DM39 to secure a long-term sustainable future for WL sites, the proposed charge for this form of development should be removed.

35. The removal of a rate for WL was accepted by the council. Under Regulation 19(4) of the CIL Regulations 2010 (as amended), the council may modify the DCS following publication and consultation. The proposed modifications are set out in document HCIL4 – Statement of Modifications, and the necessary consultation was carried out, as referred to at paragraph 16 above.

My conclusions on the background documentation

36. From the above (paragraphs 18 to 35), it can be seen that there is appropriate and adequate evidence in the background documents - the Infrastructure Delivery Plan, the Infrastructure Funding Statement 2019/20 and the Eastern Haringey Viability Update Study, together with the Note on Warehouse Living - to support the Modified Draft Charging Schedule.

Are the charging rates informed by and consistent with the evidence?

The rate for residential development

37. Other than the representations in relation to WL, dealt with above, the only other category of development for which the proposed rate drew concerns, was that for residential development. In that regard, the issues identified were i) the extent of the rise in charge from £15 per m^2 (2014 Schedule) to £50 per m^2 (current proposal); ii) the cumulative effect of CIL and S106 and the likely effect on the delivery of policy-compliant affordable housing; iii) the particular difficulty of development of 'Locally Significant Industrial Sites' and of former utilities sites such as gasworks.

38. With regard to the first of these, the concern was expressed in terms of the proposed rate being a 333.33% increase. I regard this as presenting no more understanding of the difference between the 2014 rate and the current proposal than can be gleaned from looking at the two figures - 15 and 50. To see whether the increase has an unacceptable effect on development viability, it is the viability appraisals that provide the evidence.

39. Turning to the cumulative effect of CIL and s106 obligations, this appears to be primarily a concern about the delivery of policy-compliant affordable housing alongside CIL. Representors cite a number of recent examples of major residential development that have been approved 'without providing policy-compliant levels of affordable housing'. In this regard, the council and its policies are quite clear, as are the policies of the London Plan. Taking the London Plan 2021, a threshold approach to viability is detailed in Policy H5. Part A of Policy H5 sets out the threshold approach applying to major development proposals which trigger affordable housing requirements. Part B sets out that the threshold level of affordable housing on gross residential development is initially set at: 1) a minimum of 35 per cent; or 2) 50 per cent for public sector land where there is no portfolio agreement with the Mayor; or 3) 50 per cent for Strategic Industrial Locations, Locally Significant Industrial Sites and Non-Designated Industrial Sites appropriate for residential uses in accordance with Policy E7 Industrial intensification,

co-location and substitution, where the scheme would result in a net loss of industrial capacity.

40. Policy H5 can be satisfied via two routes: a Fast Track Route and a Viability Tested Route. The Fast Track Route may be followed provided applications meet the four requirements, and they are not required to provide a viability assessment at application stage. Where an application does not meet the requirements of the Fast Track Route, it must follow the Viability Tested Route. This facilitates lower levels of affordable housing provision where the target level is demonstrated not to be viable. This approach is followed in the council's Local Plan Strategic Policies (Policy SP2) which sets out that the affordable housing target in the Local Plan Strategic Policies is subject to viability. It is also followed in Policy DM13 of the Council's Development Management DPD, which sets out that the council will seek the maximum reasonable amount of affordable housing provision when negotiating on individual private residential and mixed-use schemes, having regard to viability.

41. There was also the criticism that the 50% affordable housing target was not tested in the EHVUS. Following a question by me, I was subsequently provided with a BNPPRE 'Note on Additional Viability Testing of Residential Rates, 30 June 2020' (document HCIL12). This established (Table 3.11.1) that, over a range of tenures, the maximum borough CIL, allowing for Mayoral CIL, was at or above the £50 per m^2, whilst allowing for a sizable buffer. Furthermore, implementation of the proposed residential CIL charge of £50 per m^2 is equivalent to the provision of between 1.25% and 0.7% of units on a site as affordable housing, with the average across the typology scenarios tested being 0.91% affordable housing.

42. The answers to this and other questions I put to the council, seeking further clarification, were drawn to the attention of the relevant representors, but no further response was received. In the absence of clear evidence that throws doubt on the data or conclusions of the EHVUS, I am satisfied that the proposed modified charges for residential development are justified, and an appropriate balance has been struck. I am reinforced in this conclusion by the fact that an adequate 'buffer' from the maximum CIL charge that the various development typologies could absorb has been allowed, and that a further safeguard is the fact that existing floorspace on a development site has been ignored in the study, providing a strong reassurance that the charges are well below the maximum that could be levied.

43. Individual sites and development proposals will have their own characteristics. The policies allow for sensible and appropriate trade-offs where all desirable requirements cannot be met. The proposed charge strikes an appropriate balance between the delivery of development and the funding of necessary infrastructure to support such development as required by Regulation 14 of the CIL Regulations 2010**.**

My conclusions on the proposed rates

44. Apart from the rate proposed in the DCS for WL, which was dealt with by the modifications, it was only the proposed rate for residential development that was subject to representations. In paragraphs 37 to 43 above I have set out

my response to the proposed rate and the questioning of it. I conclude that the evidence supports the rate for residential development proposed in the partial review and the council has been realistic in terms of achieving a reasonable level of income to address a gap in infrastructure funding, while ensuring that, in general, development remains viable across most of the eastern side of the borough.

Other matters

Use Classes Order

45. The November 2019 DCS and the Modified version of September 2021 make reference to Use Classes A1 to A5. However, the Town and Country Planning (Use Classes) (Amendment) (England) Regulations 2020 made substantial changes to the Use Classes. Class A1 (shops), Class A2 (financial and professional services) and Class A3 (restaurants and cafes) were absorbed into new Class E (along with other uses). This Order came into force on 1 September 2020. I drew the council's attention to the fact that it appeared appropriate to update these references, perhaps by deleting the reference to the Use Classes. In response, the council proposed the deletion of these references, having regard to the changes which have been made to the Town and Country Planning (Use Classes) Order 1987. I will recommend accordingly.

Indexed rates

46. The council has only partially reassessed its approved Charging Schedule, reviewing only the rates in the borough's Eastern Charging Zone. In the submitted Draft Charging Schedule (document reference HCIL1) an asterisk is put against charges in the Western and Central Charging Zones. Below Table 1 there is a note which sets out that *"Rates that are not amended as part of the Partial Review of the CIL Charging Schedule 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 2022). The updated indexed figures will be provided as part of the final reviewed CIL Charging Schedule at the point of final approval (expected 2021) rather than in this Draft Charging Schedule document."* The council has stated to me that *"If the outcome of the Examination is a recommendation that the Draft Charging Schedule is sound, with or without modifications, the Council proposes to amend the Western and Central rates in the approved new CIL Charging Schedule in accordance with those set out in Haringey's Annual CIL Rate Summary 2022".*

47. The council published its Annual CIL Rate Summary 2022, dated December 2021, which shows the indexed rates that will be applicable for the Western and Central Zones and for the borough-wide charges. The council suggested that I may wish to recommend a modification now that the council has the 2022 CIL figures. However, it seems to me that, since I have only been appointed to examine the Partial Review of the CIL Charging Schedule, it would be going beyond my remit to make a recommendation about these revised figures.

48. Nevertheless, it was appropriate to draw my attention to the updated figures, and provide me with a copy of the new Annual CIL Rate Summary document that has been put on the webpage. It seems sensible for me to record here the council's intentions, for the sake of clarity. The following new rates will be inserted by the council when it approves the Partial Review Rates:

Use	Western	Central
Residential	£368.12	£229.21
Student accommodation		
Supermarkets	£131.97	
Retail warehousing	£34.73	

Overall conclusion

49. I conclude that, in setting the CIL charging rates in the MDCS, and the DCS that went before it, the council has had regard to detailed evidence on infrastructure planning and the economic viability evidence of the development market in the LBH. The council has been realistic in terms of achieving a reasonable level of income to address a gap in infrastructure funding, while ensuring that, in general, development remains viable across most of the eastern side of the borough. It has made decisions about its priorities for bringing in funds through CIL and obtaining contributions through section 106 agreements. An appropriate balance has been struck.

Are the legal requirements met?

50. The legal requirements are met:

- The Charging Schedule complies with national policy/guidance.
- The Charging Schedule complies with the 2008 Planning Act and 2010 Regulations (as amended), including in respect of the statutory processes and an appropriate level of consultation; the proposed rates are informed by and consistent with the evidence on viability across the Eastern Zone of the borough, and it is supported by an adequate financial appraisal; it is consistent with the local plan, while not undermining its delivery.

Recommendation

51. I conclude that the MDCS for the London Borough of Haringey Community Infrastructure Levy, submitted for examination on 27 September 2021, satisfies the requirements of Section 212 of the 2008 Act and meets the criteria for viability in the 2010 Regulations (as amended). I therefore recommend that, subject to one modification set out in the schedule below, the Modified Charging Schedule be approved.

Terrence Kemmann-Lane

Examiner

Modification required by the Examiner

Modification number	Modification
EM1	In the table of CIL rates, in column 1 under the heading "Use", within the development type "Office, Industrial, warehousing, small scale retail", delete the references in brackets to use class A1-5

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March 2022

Community Infrastructure Levy Charging Schedule

ning Act 2008 (as amended)

haringey.gov.uk

Haringey LONDON

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 14 March 2022.

3. Date that Effect

3.1 This charging schedule will come into effect on 1 September 2022.

4. CIL Rates

4.1 The Council charges 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

	CIL charge (£/square metre)		
Use	**Western**	**Central**	**Eastern**
Residential	£368.12	£229.21	£50
Student accommodation	£368.12	£229.21	£85
Build to Rent housing	£368.12	£229.21	£100
Supermarkets	£131.97		
Retail Warehousing	£34.73		
Office, industrial, warehousing, small scale retail	Nil Rate		
Health, school and higher education	Nil Rate		
All other uses	Nil Rate		
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 London Plan 2021			

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.

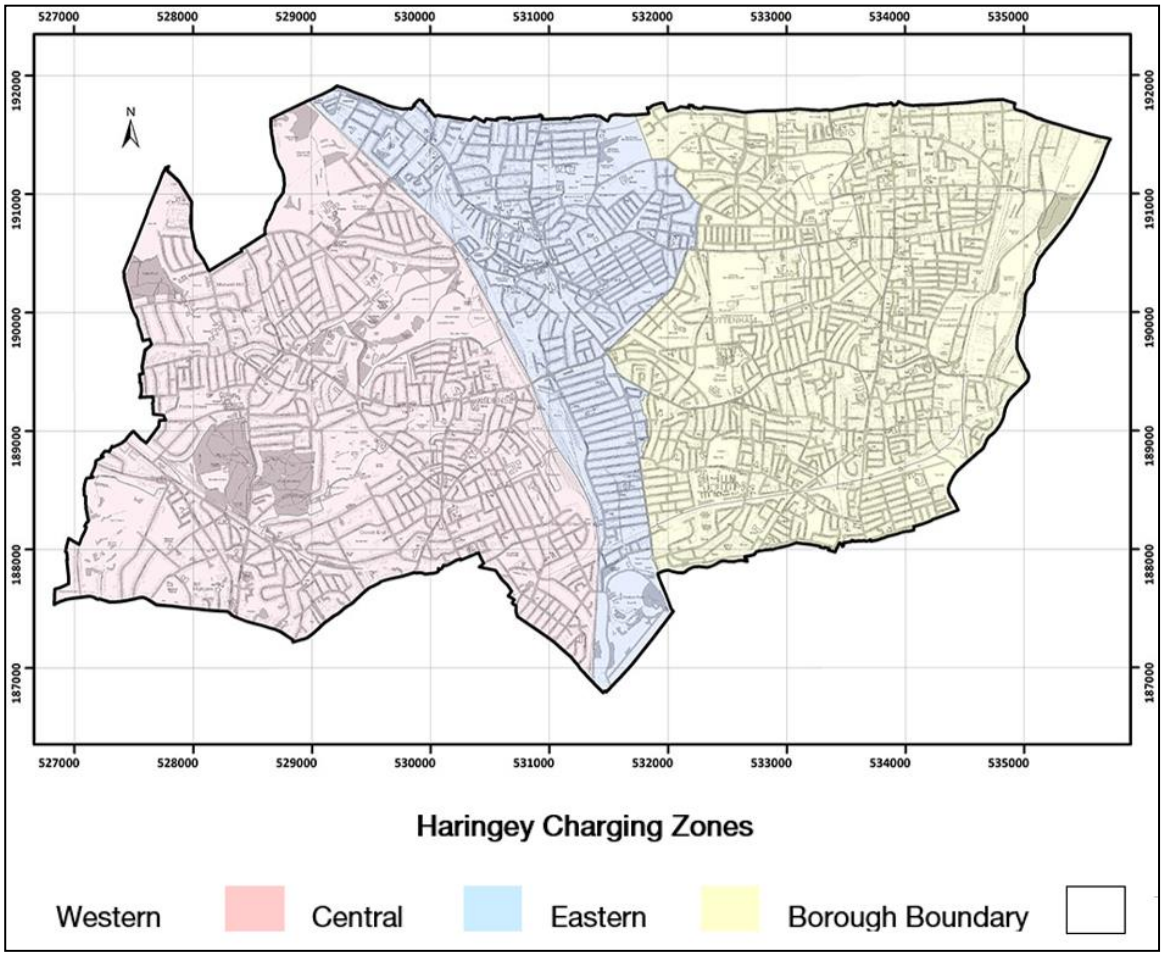
7. Statutory Compliance

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


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Borough Boundary

MINUTES OF CABINET MEMBER SIGNING MEETING HELD ON FRIDAY, 4TH FEBRUARY, 2022, 4.00 - 4.15 PM

PRESENT: Councillor Mike Hakata, Cabinet Member for Environment, Transport and the Climate Emergency.

In attendance: Danny Gayle, Engineering Projects Manager; Ann Cunningham, Head of Highways and Parking; Mark Stevens, Assistant Director Direct Services; and Fiona Rae, Acting Committees Manager.

99. APOLOGIES FOR ABSENCE

There were no apologies for absence.

100. DECLARATIONS OF INTEREST

There were no declarations of interest.

101. PROPOSED CYCLING IMPROVEMENTS ALONG BOUNDS GREEN ROAD N22

The Cabinet Member for Environment, Transport and the Climate Emergency considered the report which reported on the feedback of the statutory consultation carried out from 20 October to 10 November 2021, on proposals to improve protection for cyclists using the northbound and southbound cycle lanes along Bounds Green Road from the junction with High Road to Bounds Green underground station. The report also sought approval to proceed to implementation, having considered objections received to the statutory consultation.

The Cabinet Member RESOLVED

To approve the implementation of the Bounds Green Road cycling improvement scheme, which includes:

(i) Converting the majority of the existing southbound and northbound advisory cycle lanes on Bounds Green Road from the junction with High Road to Bounds Green station to mandatory cycle lanes and the single kerb blips to double kerb blips.

(ii) Adding protection for cyclists by replacing the existing wand and mini orcas with longer poles installed inside the markings of the new mandatory cycle lane.

Reasons for decision

The Council is required to consider the feedback received during the Statutory Notification period, in particular any objections to proposals, prior to proceeding to implementation. The proposed changes will make it safer for cyclists using these lanes as motor vehicles will not be allowed to enter the mandatory cycle lanes.

Alternative options considered

None.

102. PROPOSED CYCLING IMPROVEMENTS ALONG HIGH ROAD N22

The Cabinet Member for Environment, Transport and the Climate Emergency considered the report which reported on the feedback of the statutory consultation carried out from 20 October to 10 November 2021 on proposals to improve protection for cyclists using the northbound and southbound cycle lanes along a section of High Road from the junction with Bounds Green Road to the junction with Station Road. The report also sought approval to proceed to implementation, having considered objections received to the statutory consultation.

The Cabinet Member RESOLVED

To approve the implementation of the High Road, N22 cycling improvement scheme, which includes:

(i) Converting the majority of the existing southbound advisory cycle lanes on High Road from the junction with Bounds Green Road to the junction with Station Road to mandatory cycle lanes and the single kerb blip restrictions to double blips.

(ii) Adding protection for cyclists by replacing the existing wand and mini orcas with longer and additional poles installed inside the markings of the new mandatory cycle lane (except the section where the bus alighting point has been provided).

(iii) Converting the existing two number ‘Car Club’ bays on Cranbrook Park to loading bays. Two new ‘Car Club’ bays will be provided opposite No.3 Cranbrook Park.

Reasons for decision

The Council is required to consider the feedback received during the statutory notification period, in particular any objections to proposals, prior to proceeding to implementation. The proposed changes will make it safer for cyclists using these lanes as motor vehicles will not be allowed to enter the mandatory cycle lanes.

Alternative options considered

None.

CABINET MEMBER: Cllr Mike Hakata

Signed by Chair ……..

Date …5 February 2022……

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MINUTES OF CABINET MEMBER SIGNING MEETING HELD ON MONDAY, 7TH FEBRUARY, 2022, 11.30 - 11.35 AM

PRESENT: Councillor Zena Brabazon, Cabinet Member for Early Years, Children, and Families.

In attendance: Sara Khan, Development Manager; Flo Armstrong, Library Strategy Development Manager; and Fiona Rae, Principal Committee Co-ordinator**ALSO**

103. APOLOGIES FOR ABSENCE

There were no apologies for absence.

104. DECLARATIONS OF INTEREST

There were no declarations of interest.

105. AWARD OF CONTRACT FOR THE PURCHASE OF LIBRARY STOCK

The Cabinet Member for Early Years, Children, and Families considered the report which sought to enter into call-off contracts for the purchase of Library Stock with the preferred Contractors Supplier A and Supplier B for a period of 3 years with an option to extend for a further 2 years as allowed under the Council Contracts Standing Order (CSO) 9.07.1(d) for a total contract value of not exceeding £1,000,000.

It was noted that the contract was broken down in the following Lots:
Lot 1 (Adult Stock & Reference) – Supplier A
Lot 2 (Children's Stock) – Supplier B
Lot 3 (Audio Visual Stock) – Supplier A

The Cabinet Member RESOLVED

1. To give approval for the Council to enter into Call-off contracts with Supplier A and Supplier B for purchase of library stock in accordance with Contract Standing Order 7.01(b) and Contract Standing Order 9.07.1(d) for a maximum value of £1,000,000. Details of Suppliers A and B are outlined in Appendix 1 - Part B (exempt information) of the report.

2. To agree that the contract period is 1 April 2022 – 31 March 2025 (with an option to extend for up to a further 2 years).

Reasons for decision

Library services contribute to key priorities 2, 3 & 4 by providing access to education, learning and employment opportunities through the resources they provide and staff

expertise. They are at the heart of communities and help to foster a sense of place, helping to combat social isolation, improving wellbeing and growing local economy by increasing access to business opportunities.

The purchase of stock is budgeted for and forms a fundamental part of Business As Usual. Library stock is a core element of the service. It provides communities and individuals with access to materials that facilitate learning for all ages, it supports educational attainment, helps to improve literacy levels and to get people into further education and the work place. It combats social isolation, for example though book groups and baby and toddler storytimes.

Failure to provide quality library stock impacts significantly on the levels of use and the ability of libraries to contribute to the Council's priorities; it carries a reputational risk for the Council and compromises our ability to comply with the Public Libraries Act of 1964.

In order to ensure compliance with procurement legislation and ensure value for money, strategic procurement led a Mini Competition exercise in accordance with CSO 7.01(b). The ESPO Framework, Library Stock supply (ref 376F_18) was used. The tender was sent to three suppliers (industry leading suppliers) that were registered in the Framework Agreement. The Mini Competition was based on:

Price 50%
Quality 50%

The reason the above evaluation weighting was applied was to ensure the Council's requirement for high quality, sensitive, accurate and critical data was met by the winning supplier/s.

The Pricing Schedule for each Lot was a shopping basket of 50 books (for Lots 1 and 2 and audio visual material for Lot 3), that suppliers were asked to bid for (net of discount of retail price), processing costs and supplier selection costs.

Alternative options considered

Do nothing This was not an option as purchase of new library stock is essential to ensure that library provision is current and in the case of non fiction and reference materials accurate.

Direct Award as an alternative to a mini competition This was not considered as viable option as the mini competition would yield a better cost effective (value for money) outcome.

106. EXCLUSION OF THE PRESS AND PUBLIC

RESOLVED

That the press and public be excluded from the remainder of the meeting as item 5 contained exempt information, as defined in Section 100a of the Local Government

Act 1972 (as amended by Section 12A of the Local Government Act 1985); paras 3 and 5, namely information relating to the financial or business affairs of any particular person (including the authority holding that information) and information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.

107. EXEMPT - AWARD OF CONTRACT FOR THE PURCHASE OF LIBRARY STOCK

The Cabinet Member considered the exempt information.

The Chair of Overview and Scrutiny has been informed that it was impracticable to give 28 days' notice of the decision. The purchase of new library stock is essential to ensure that there is continuous library provision. The existing contract for library stock is due to expire on 31 March 2022 and a decision must be made with sufficient time for implementation in order to ensure continuity of service. As a result, it is impractical to provide 28 days' notice of this decision without risking interruptions to library services.

CABINET MEMBER: Cllr Zena Brabazon

Signed by Cabinet Member ……..

Date …7 February 2022……

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MINUTES OF CABINET MEMBER SIGNING MEETING HELD ON MONDAY, 7TH FEBRUARY, 2022, 1.30 - 1.50 PM

PRESENT: Councillor Isidoros Diakides – Cabinet Member for Finance and Transformation.

In attendance: Andrew Meek, Head of Organisational Resilience; Martin Young, Senior Project Manager; Jonathan Kirby, Assistant Director for Capital Projects and Property; and Fiona Rae, Acting Committees Manager.

108. APOLOGIES FOR ABSENCE

There were no apologies for absence.

109. DECLARATIONS OF INTEREST

There were no declarations of interest.

110. CONTRACT AWARD - GROUND AND THIRD FLOOR OF 48 STATION ROAD REFURBISHMENT WORKS

The Cabinet Member for Finance and Transformation considered the report which sought approval to award the contract for the Refurbishment and Fit out of 48 Station Road Ground & 3rd Floor to enable relocation of departments currently occupying 40 Cumberland Road.

The Cabinet Member was informed that, in November 2021, Cabinet had approved to undertake refurbishment works to Alexandra House and 48 Station Road to ensure that the Council had suitable office space for its workforce. The current proposal was for refurbishment works for the Ground Floor and 3rd Floor of 48 Station Road. These works were being accelerated ahead of the main refurbishment as they provided for the early relocation of services from 40 Cumberland Road which would enable the Council to gain vacant possession of 40 Cumberland Road.

It was noted that an option to delay the current proposal to take place as part of the main programme of works had been considered but had not been recommended as it would prevent the relocation of the current departments occupying 40 Cumberland Road – who would occupy the Ground and 3rd Floors of 48 Station Road. This location had been earmarked for redevelopment in a Regeneration-led project that had secured Greater London Authority (GLA) funding. It was highlighted that the GLA funding was time bound and that vacant possession of 40 Cumberland Road must be completed by 30 April 2022. It was added that delays in the current proposal would also impact the timeline for the overall accommodation programme.

In relation to the procurement process, officers explained that this had been undertaken through the South East Consortium Framework. It was noted that a

framework facilitator pre-vetted suppliers on a defined list and ranked them based on quality, price, and value. This allowed the Council to make a Direct Award to a top tier contractor, which was compliant and considerably reduced the appointment time. The Cabinet Member enquired about the value of Direct Awards. Officers noted that an independent consultant had generated a cost plan for the works, based on market rates, which allowed the council to discuss any disparities with the contractor's pricing. Also, it was commented that this contractor has been used by the council in the past and had performed satisfactorily.

The Cabinet Member enquired whether the proposed contractor had any local connections and whether they would employ local people. Officers explained that the contractor was based in London but not in Haringey specifically. It was noted that the contractor had continually employed staff rather than sub-contractors and the Cabinet Member asked that every effort was made to seek to negotiate maximum employment of employees and suppliers from the borough.

The Cabinet Member stated that, as a general rule, it was important to undertake competitive tenders unless absolutely unavoidable and also to recruit locally as much as possible but accepted the urgency around issues of funding and programming in this case.

The Cabinet Member RESOLVED

1. In accordance with Contract Standing Order 16.02, to approve the award of the Contract for works at 48 Station Road in the sum of £619,082.39 excluding VAT to Foster Property Maintenance Ltd.

2. To approve the issue of a letter of Intent to the contractor, to enable the start on site date in advance of the completion of Contract Documents to the value of £61,908 being 10% of the contract sum.

3. To agree an additional recommendation as set out in the exempt report.

Reasons for decision

To deliver the Council's Accommodation strategy objectives

In November 2021, Cabinet approved a proposal to refurbish Alexandra House and 48 Station Road, and to tender the associated works packages.

- The overall objectives of the programme are:
- To deliver office accommodation improvements
- To enable the continued adoption of flexible working
- To support short-term goals in the Accommodation Strategy

The works proposed in this package will provide an improved reception areas in 48 Station Road, which will be particularly designed with the needs of Childrens', Adults and Housing services.

It will also provide a new operational home for the Young Adults Service.

On the third floor, accommodation will be provided that will support colocation with NHS partners; office space for the Trades Unions; and flexible space that may be used by Council officers.

To expedite timely delivery of key aspects of the programme

The abovementioned Cabinet Report set out that, in addition to the appointment of a main contractor, it would be necessary to undertake some of the works at an earlier stage. The works proposed in this report is one such package.

It is necessary and expedient to undertake the refurbishment of two floors of 48 Station Road at an early stage, to meet timescales needed for gaining vacant possession of 40 Cumberland Road. A separate Cabinet Paper sets out the plans for 40 Cumberland Road. These plans rely in part on GLA grant funding, which is time-dependent.

Alternative options considered

Do Nothing
The option to do nothing has been discounted, as the Council would not be able to meet its Accommodation Strategy objectives.

Refurbish as part of the main programme
This option would be for the Council not to commission Foster Property Maintenance Ltd to carry out the works and for this floor to be refurbished as part of the main programme of works in 48 Station Road. This work is programmed to start in late March 2022 subject to cabinet approval.

This would further prevent the relocation of the current departments occupying 40 Cumberland Road – who will occupy the ground and 3rd floors of 48 Station Road. This location has been earmarked for redevelopment in a Regeneration-led project that has secured GLA funding.

Because this GLA funding is time bound, including this work in the main programme of works is not a feasible option as the cabinet approval would not be granted in sufficient time to allow the fit out to complete. Vacant possession of 40 Cumberland Road must be completed by 30th April 2022.

111. EXCLUSION OF THE PRESS AND PUBLIC

RESOLVED

That the press and public be excluded from the remainder of the meeting as item 5 contained exempt information, as defined in Section 100a of the Local Government Act 1972 (as amended by Section 12A of the Local Government Act 1985); paras 3 and 5, namely information relating to the financial or business affairs of any particular person (including the authority holding that information) and information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.

112. CONTRACT AWARD - GROUND AND THIRD FLOOR OF 48 STATION ROAD REFURBISHMENT WORKS

The Cabinet Member considered the exempt information.

The Chair of Overview and Scrutiny has been informed that it was impracticable to give 28 days' notice of the decision. It was originally envisaged that a Cabinet approval would not be required. The report unfortunately could not be prepared in time for the January Cabinet meeting. If the decision was delayed until the February Cabinet meeting, the programme would slip so that the Council would not achieve timely vacant possession of 40 Cumberland Road and this would jeopardise the timeline for the Enterprise Hub, which would mean the Council would no longer gain Greater London Authority grant funding of approximately £800,000 towards this initiative.

CABINET MEMBER: Cllr Isidoros Diakides

Signed by Cabinet Member ……..

Date …7 February 2022 ……

MINUTES OF CABINET MEMBER SIGNING MEETING HELD ON THURSDAY, 10TH FEBRUARY, 2022, 10.00 - 10.25 AM

PRESENT: Councillor Lucia das Neves, Cabinet Member for Health, Social Care, and Well-Being.

In attendance: Akeem Ogunyemi, Public Health Commissioner; Bobbi Virgo, Procurement Strategic Partner (Care); and Fiona Rae, Acting Committees Manager.

113. APOLOGIES FOR ABSENCE

There were no apologies for absence.

114. DECLARATIONS OF INTEREST

There were no declarations of interest.

115. PHARMACIES ENHANCED SERVICES CONTRACT

The Cabinet Member for Health, Social Care, and Well-Being considered the report which detailed the outcome of an open tender process and sought agreement from the Cabinet for Health, Social Care and Well-Being to award contracts to successful community pharmacies (detailed in exempt appendix 1) for the provision of one or all of the following; healthy start vitamins; stop smoking service and specific sexual health services as part of the Healthy Living Pharmacy (HLP) programme.

It was proposed that contracts would be awarded for a period of 4 years from 1 April 2022 – 31 March 2026, with an option to extend for a further 4 years.

The Cabinet Member enquired whether the proposed contracts would provide suitable coverage throughout the borough and whether they were flexible enough to adapt to any changes in need or demand. The Public Health Commissioner noted that the contracts would provide suitable coverage and would be flexible. It was explained that there had been significant investment in the Haringey pharmacy programme and that it was the largest pharmacy programme in London. It was also noted that health services were constantly adapting to changing needs and were expected to change following the Covid-19 pandemic. It was highlighted that the contracts had been designed to accommodate changing health needs and service developments.

The Cabinet Member RESOLVED

1. To agree to award contracts in respect of the provision of pharmacies enhanced services to the successful community pharmacies listed exempt appendix 1, in accordance with Contract Standing Order (CSO) 16.02.

2. To agree that the contracts will be awarded to the approved pharmacy providers listed in exempt appendix 1 for a period of 4 years from 1 April 2022 – 31 March 2026, with an option to extend for a further period of 4 years. The estimated cost for the provision across all participating pharmacies per year for the initial 4-year term of the contract will be as follows: a) Healthy Start vitamins £10,000 b) stop smoking services £25,000 and c) sexual health services £240,000. The total combined cost across the services over 4 years will be £1,100,000.

Reasons for decision

The council undertook a full open-tender procurement exercise, inviting applications from community pharmacists to provide a suite of public health services.

The process for selecting the preferred community pharmacies was based on the applications achieving the highest score based on quality.

The services to be commissioned will contribute to achieving the outcomes of the borough plan. Contracting pharmacies to provide these services offers additional service choice to residents, whist also targeting services to residents and communities most in need and whilst also helping to reduce pressures on Council budget which would have been directed at more expensive clinical based providers.

Alternative options considered

As part of a rigorous contract and service review exercise, the public health team considered no longer commissioning pharmacies to deliver these services and instead, divert additional resources to other specialist services. The conclusion was that pharmacies offered good quality and easy access to services for residents at a lower cost than specialist services. They therefore support the Council to increase its prevention activity and achieve its medium term financial strategy.

In addition, the impact of the covid-19 pandemic has also brought into stark focus the health inequalities still experienced by some communities and groups. Investing in community pharmacies based in localities significantly affected by covid-19 will support continued improvements in health outcomes for residents whilst also contributing to the council's objective of reducing health inequalities and the impact these inequalities play in improving the health and wellbeing of local residents.

116. EXCLUSION OF THE PRESS AND PUBLIC

RESOLVED

That the press and public be excluded from the remainder of the meeting as item 5 contained exempt information, as defined in Section 100a of the Local Government Act 1972 (as amended by Section 12A of the Local Government Act 1985); paras 3 and 5, namely information relating to the financial or business affairs of any particular person (including the authority holding that information) and information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.

117. EXEMPT - PHARMACIES ENHANCED SERVICES CONTRACT

The Cabinet Member considered the exempt information.

CABINET MEMBER: Cllr Lucia das Neves

Signed by Cabinet Member ……..

Date …15 February 2022……

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MINUTES OF CABINET MEMBER SIGNING MEETING HELD ON WEDNESDAY, 16TH FEBRUARY, 2022, 10.00 - 10.10 AM

PRESENT: Councillor Zena Brabazon, Cabinet Member for Early Years, Children, and Families.

In attendance: Sylvester Olutayo, Senior Project Manager; Chris Hill, Project Officer; Adrian Watson, Major Projects Delivery Officer; Claire Barnes, Senior Project Manager; Keith Mattacks, Project Manager; and Fiona Rae, Acting Committees Manager.

118. APOLOGIES FOR ABSENCE

There were no apologies for absence.

119. DECLARATIONS OF INTEREST

There were no declarations of interest.

120. WEST GREEN AND BRUCE GROVE PRIMARY SCHOOLS BUILDING SERVICES AND EXTERNAL ENVELOPE WORKS - VARIATION OF CONSTRUCTION CONTRACT

It was highlighted that there were some minor corrections to the original report that had been published. The corrections were set out and specifically marked in the addendum to the report. It was explained that the key difference was that the variation of the construction contract to Mulalley & Company Limited was in the sum of **£374,200** (rather than £294,200), giving a total contract sum of **£2,644,202.90** (rather than £2,564,202.90) for West Green Primary School. It was also noted that any amendments were highlighted in bold text in the minutes. The corrections were noted by the Cabinet Member.

The Cabinet Member for Early Years, Children, and Families considered the report which noted that, on 2 July 2021, the Cabinet Member had approved an award to Mulalley & Company Ltd for the Construction Contract for West Green Primary School in the sum of £2,270,002.90. The report sought Cabinet Member approval to vary the original contract with Mulalley & Company Ltd for the sum of **£374,200** as allowed under Contract Standing Order (CSO) 10.2.1.b and CSO 16.02, to allow for additional roof **and condition** works to be completed at the site. This provided the Council with greater value for money by including them within the current contract works on site, as opposed to returning with a separate contract, causing further disruption to the school.

The report also noted that, on 15 June 2021, the Cabinet Member had approved an award to Mulalley & Company Ltd for the Construction Contract for Bruce Grove Primary School in the sum of £2,763,207. The report sought Cabinet Member approval to vary the original contract with Mulalley & Company Ltd for the sum of

£318,793 as allowed under Contract Standing Order (CSO) 10.2.1.b and CSO 16.02, to allow for an element of additional works to be completed. This had resulted in significant delays to the programme, for which extension of time requests had been requested.

The Cabinet Member RESOLVED

1. To note that the original contract award approved by the Cabinet Member for Early Years, Children, and Families for West Green Primary School was in the sum of £2,270,002.90.

2. To agree a variation of the construction contract to Mulalley & Company Limited in the sum of **£374,200**, giving a total contract sum of **£2,644,202.90** for West Green Primary School.

3. To note that the original contract award approved by the Cabinet Member for Early Years, Children, and Families for Bruce Grove Primary School was in the sum of £2,763,207.

4. To agree a variation of the construction contract to Mulalley & Company Limited in the sum of £318,793, giving a total contract sum of £3,082,000 for Bruce Grove Primary School.

Reasons for decision

West Green Primary School - During construction, additional condition works were identified that include **building services works** and the complete replacement of the hall roof, as it is in significant disrepair and deterioration across the main roof structure, has rotten and sagging timber framing around its windows, with some splitting of timbers in some occurrences, and significant outward bowing of the roof structure, due to the yielding of the steel ties. The extent of this condition would not be identified through non-intrusive surveys and would only be discovered once the works commenced and the contractor was able to fully access, open up and intrusively inspect the hall roof structure. **This may result in a delay of up to 8 weeks to the project, therefore the above includes a risk allowance for any possible extension of time claim.** The Children's Capital Programme Budget is sufficient to cover this contract increase.

Bruce Grove Primary – During construction and once full access to the roof was available, additional condition works were identified including replacement of roof tiles, detailing and build-up of insulation. Additional glazing and building services works have also been identified. This has resulted in a delay of up to 14 weeks to the project therefore the above includes a risk allowance for an extension of time claim which is yet to be concluded. The Children's Capital Programme Budget is sufficient to cover this contract increase.

Going forward, the Council's Strategic Asset Management Programme, will produce a costed asset management works programme that can inform items like this; so it can be referred to and allowances can be made within contracts when under taking significant capital works.

Alternative options considered

Do nothing – a decision not to support the increase in the value of the construction works contract will result in delays in completing urgent condition works, leave the school with a roof at the end of its serviceable life, and increase the health and safety risk of closure (in part or full site) and disruption to children's education.

121. HIGHGATE PRIMARY SCHOOL - PHASE 2 EXTERNAL ENVELOPE & BUILDING SERVICES REPLACEMENT WORKS - AWARD OF CONSTRUCTION CONTRACT

The Cabinet Member for Early Years, Children, and Families considered the report which requested approval to award a contract to Kind Diamond Build Consortium Ltd up to the value of £2,239,272 to undertake external envelope and building services improvement works at Highgate Primary School pursuant to contract standing order 16.02. The report also requested, pursuant to Contract Standing Order (CSO) 16.02, approval to issue a letter of intent.

The Cabinet Member highlighted the importance of contract monitoring to prevent any issues from arising. Officers confirmed that the contract would be monitored and that there was confidence in the contractors to deliver the works.

The Cabinet Member RESOLVED

1. Pursuant to Contract Standing Order 16.02, to approve an award of contract to Kind Diamond Build Consortium Ltd to the value of £2,239,272.

2. To approve a client construction contingency as detailed in the exempt appendix to this report which will be strictly managed under change control governance arrangements.

3. To approve the issuance of a letter of intent for up to 10% of the contract value, totalling £223,927.20.

Reasons for decision

A major review of the condition and suitability of the Children's Services estate has been undertaken which has informed the Children's Service's asset management plan (CSAMP). This identified condition and suitability deficiencies in the primary, secondary, and wider Children's Service estate need addressing in the short, medium, and long term.

Highgate Primary School is high priority for major works due to issues relating to health and safety or the school is at risk of school closure.

In 2019, a commission was given to further investigate and address urgent works relating to the condition of building services (i.e. heating, electrics and plumbing), external envelope (i.e. roofs, windows) and boundary security.

A scheme for Highgate Primary School has been developed to achieve the following:

- Salix Public Sector Decarbonisation grant funding works (Loft Insulation).
- Boiler and heating works completion prior to the heating season starting in October.
- Roof replacement, brick repointing, below and above ground drainage.
- Small package of electrical works.

This construction award report requests a decision on the procurement of a contractor to undertake all the external envelope and building services infrastructure works identified, designed and approved by the project sponsor.

A Cabinet Member decision is required in February 2022 to enable timely mobilisation and facilitate procurement of longer lead in materials as soon as possible, which will offer greater likelihood of achieving maximum grant funding available.

Alternative options considered

Do nothing – a decision not to support this award of construction contract will result in the Councils failure to suitably maintain its education estate by undertaking essential condition improvements. This would increase the likelihood of reactive works which will create greater disruption and cost to the council and potentially result in the loss of education days. All of which would undoubtedly impact on the quality of teaching and learning.

122. EXCLUSION OF THE PRESS AND PUBLIC

RESOLVED

That the press and public be excluded from the remainder of the meeting as item 6 contained exempt information, as defined in Section 100a of the Local Government Act 1972 (as amended by Section 12A of the Local Government Act 1985); paras 3 and 5, namely information relating to the financial or business affairs of any particular person (including the authority holding that information) and information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.

123. EXEMPT - HIGHGATE PRIMARY SCHOOL - PHASE 2 EXTERNAL ENVELOPE & BUILDING SERVICES REPLACEMENT WORKS - AWARD OF CONSTRUCTION CONTRACT

The Cabinet Member considered the exempt information.

CABINET MEMBER: Cllr Zena Brabazon

Signed by Cabinet Member ……..

Date …16 February 2022……

MINUTES OF CABINET MEMBER SIGNING MEETING HELD ON FRIDAY, 18TH FEBRUARY, 2022, 10.00 - 10.25 AM.

PRESENT: Councillor Zena Brabazon, Cabinet Member for Early Years, Children, and Families.

In attendance: Carlo Kodsi, Head of Admissions and School Organisation; Eveleen Riordan, Assistant Director for Schools and Learning; and Fiona Rae, Acting Committees Manager.

124. APOLOGIES FOR ABSENCE

There were no apologies for absence.

125. DECLARATIONS OF INTEREST

There were no declarations of interest

126. ADMISSION TO SCHOOLS - DETERMINED ADMISSION ARRANGEMENTS FOR 2023/24

The Cabinet Member for Early Years, Children, and Families considered the report which sought the determination of the proposed admission arrangements for the borough's community and voluntary controlled (VC) schools for the 2023/24 academic year to continue to meet statutory requirements. The report also asked for agreement for publication on or before 15 March 2022 on the Council's website, such details to include advice on the right of objection to the Schools Adjudicator.

It was noted that there was no change proposed to the admission arrangements for Haringey community and voluntary controlled (VC) schools. The only changes to the admission arrangements were those reflected in the mandatory requirements that already came into effect from September 2021 because of the Department of Education's (DfE) new School Admissions Code (2021).

It was also noted that, on 9 November 2021, Cabinet agreed that statutory consultation should be carried out on the proposed admission arrangements between 26 November 2021 and 7 January 2022.

The Cabinet Member RESOLVED

1. To determine the Council's admission arrangements for the academic year 2023/24 as set out in Appendices 1 – 4 to the report.

2. To agree the in-year fair access protocol as set out in Appendix 5 to come into force from 1 March 2022.

3. To agree that the determined arrangements for all maintained primary and secondary schools in the borough are published on the Council's website by 15 March 2022 with an explanation of the right for any person or body, under the School Admissions (Admission Arrangements and Co-ordination of Admission Arrangements) Regulations 2012 ('the Regulations'), to object to the Schools Adjudicator in the specified circumstances set out.

Reasons for decision

The School Admissions Code 2021 (referred as 'the Code') requires all admission authorities to determine admission arrangements every year, even if they have not changed from previous years. Regulation 17 of the Regulations 2012 also requires admission authorities to determine admission arrangements by 28 February in the determination year.

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

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

Alternative options considered

This year we did not propose a change to the admission arrangements including 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 Code (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), none of the above serve the local interest of our families and school communities so no alternative option is being considered at the time of writing this report.

CABINET MEMBER: Cllr Zena Brabazon

Signed by Cabinet Member ……..

Date …18 February 2022……

MINUTES OF CABINET MEMBER SIGNING MEETING HELD ON FRIDAY, 25TH FEBRUARY, 2022, 1.00 PM - 1.17 PM.

PRESENT: Councillor Erdal Dogan, Cabinet Member for Stronger and Safer Communities.

In attendance: Joe Benmore, Offender Management, Strategic Lead and Nazyer Choudhury, Principal Committee Co-Ordinator.

127. APOLOGIES FOR ABSENCE

There were no apologies for absence.

128. DECLARATIONS OF INTEREST

There were no declarations of interest.

129. ALLEY GATE PUBLIC SPACE PROTECTION ORDER - NOEL PARK WARD

The Cabinet Member for Stronger and Safer Communities considered the report as in April 2021, The Mayor's Office for Policing and Crime, (MOPAC) as the Police and Crime Commissioner for London, invited London Boroughs to submit a bid to The Home Office Safer Streets Fund Scheme. Haringey Council submitted a bid totalling £301,579 and was selected as the primary bid for London.

As part of the bidding process, the Home Office crime data identified Noel Park Ward (the Ward) as having high rates of burglary and associated acquisitive offending and anti-social behaviour (ASB) per head of population and relative to Ward size. The data indicates increases in these crimes in the Ward over a five year period, with the Ward identified as one of the most significant contributors to burglary and associated acquisitive offending and ASB in London.

A Public Spaces Protection Order (PSPO) is an order which is intended to deal with a particular nuisance or problem in a defined area which is detrimental to the local community's quality of life by imposing conditions on the use of that area. The Council wishes to consult on the introduction of such an order.

The PSPO proposed for Noel Park will include the installation of four gates which will restrict unlawful entry/activities.

Page 11 of the report stating the summary of the recommendations described Location Four as being 'East' of the High Road and should say 'West'.

There would be a four-week consultation with residents who would be affected with the gate installations and the residents who lived on the road or on the alleyways would have access to the gate using a key-fob entry system or a keypad entry system. Only those residents with permission to use the alley would be permitted to use the system.

There were no projected costs regarding the maintenance of the system. As part of the contract, there was a two-year maintenance period but any general maintenance would be carried out by the Council.

The consultation would include consideration for residents with mobility issues and there would also be sufficient support for residents with mobility issues.

The system generally required low levels maintenance but checks would be made with the contractors as to what support would be provided after two years.

The ward councillors would be involved in the early stages of the consultation. A rationale and timeline for installation would also be provided.

The meeting noted the emphasis that had been placed by residents for such a system to address security concerns.

The Cabinet Member RESOLVED

To approve in principle a formal public consultation in relation to the potential introduction of a Public Spaces Protection Order (PSPO) in Noel Park Ward. Details of the proposal are contained in Appendix 1 and would include the installation of the four gates at the front of alleyways/ mews. The consultation will commence in accordance with section 72 of the Antisocial Behaviour, Crime and Policing Act 2014, with consultation to run, upon approval, for a minimum period of four weeks.

Reasons for decision

Over the years, the Council, its partners and key stakeholders have undertaken various measures and activities to tackle the ASB issues that blight residents' lives. Due to the limited success of various measures and activities undertaken, it is considered by officers that an effective deterrent will be the use of PSPO powers alongside the tools and powers available to the council under the Antisocial Behaviour, Crime and Policing Act 2014.

The legislation allows for the use of enforcement such as fixed penalty notices and prosecution. It is proposed that, in order to support the legislation, targeted and sustained enforcement will be used from partners including: Wood Green Town Centre Police Team, Haringey Police, British Transport Police, Immigration, ASB Enforcement Team officers and other Council Officers. It must be noted that there will be a financial cost should the authority wish to prosecute any of the perpetrators.

Alternative options considered

Not to pursue any PSPO. Given community feedback over many years, the volume of burglaries, and the acquisitive crime and ASB being caused in the Ward there are no options that could be considered as an appropriate alternative to deter and manage the use of the identified alleyways which are currently encouraging ongoing criminality and ASB.

CABINET MEMBER: Cllr Erdal Dogan

Signed by Cabinet Member ……

Date …25 February 2022……..

CHAIR:

Signed by Chair ……..

Date ……

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