



HILLINGDON
LONDON



CABINET

Date: THURSDAY, 15 FEBRUARY
2018

Time: 7.00 PM

Venue: COMMITTEE ROOM 6 -
CIVIC CENTRE, HIGH
STREET, UXBRIDGE UB8
1UW

**Meeting
Details:** Members of the Public and
Media are welcome to attend
this meeting and observe the
public business discussed.

This meeting will also be
broadcast live on the
Council's YouTube Channel.

To all Members of the Cabinet:

Ray Puddifoot MBE (Chairman)
Leader of the Council

David Simmonds CBE (Vice-Chairman)
Deputy Leader / Education & Children's Services

Jonathan Bianco
Finance, Property & Business Services

Keith Burrows
Planning, Transportation & Recycling

Philip Corthorne
Social Services, Housing, Health & Wellbeing

Douglas Mills
Community, Commerce & Regeneration

Richard Lewis
Central Services, Culture & Heritage

Published:
Wednesday 7 February 2018

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This Agenda is available online at:
www.hillingdon.gov.uk

Lloyd White
Head of Democratic Services
London Borough of Hillingdon,
3E/05, Civic Centre, High Street, Uxbridge, UB8 1UW
www.hillingdon.gov.uk

Putting our residents first

Useful information for residents and visitors

Watching & recording this meeting

You can watch the public part of this meeting on the Council's YouTube channel, live or archived after the meeting. Residents and the media are also welcome to attend in person, and if they wish, report on the public part of the meeting. Any individual or organisation may record or film proceedings as long as it does not disrupt proceedings.

Watch a **LIVE** broadcast of this meeting on the Council's YouTube Channel: *Hillingdon London*

Those attending should be aware that the Council will film and record proceedings for both official record and resident digital engagement in democracy.



It is recommended to give advance notice of filming to ensure any particular requirements can be met. The Council will provide seating areas for residents/public, high speed WiFi access to all attending and an area for the media to report. The officer shown on the front of this agenda should be contacted for further information and will be available to assist.

When present in the room, silent mode should be enabled for all mobile devices.

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Notice

Notice of meeting and any private business

The London Borough of Hillingdon is a modern, transparent Council and through effective Cabinet governance, it seeks to ensure the decisions it takes are done so in public as far as possible. Much of the business on the agenda for this Cabinet meeting will be open to residents, the wider public and media to attend. However, there will be some business to be considered that contains, for example, confidential, commercially sensitive or personal information. Such business is shown in Part 2 of the agenda and is considered in private. Further information on why this is the case can be sought from Democratic Services.

This is formal notice under The Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012 to confirm that the Cabinet meeting to be held on:

15 February 2018 at 7pm in Committee Room 6, Civic Centre, Uxbridge

will be held partly in private and that 28 clear days public notice of this meeting has been given. The reason for this is because the private (Part 2) reports listed on the agenda for the meeting will contain either confidential information or exempt information under Part 1 of Schedule 12A to the Local Government (Access to Information) Act 1985 (as amended) and that the public interest in withholding the information outweighs the public interest in disclosing it. An online and a hard copy notice at the Civic Centre in Uxbridge indicates a number associated with each report with the reason why a particular decision will be taken in private under the categories set out below:

- (1) information relating to any individual
- (2) information which is likely to reveal the identity of an individual
- (3) information relating to the financial or business affairs of any particular person (including the authority holding that information)
- (4) information relating to any consultations or negotiations, or contemplated consultations or negotiations, in connection with any labour relations matter arising between the authority or a Minister of the Crown and employees of, or office holders under, the authority.
- (5) Information in respect of which a claim to legal professional privilege could be maintained in legal proceedings.
- (6) Information which reveals that the authority proposes (a) to give under any enactment a notice under or by virtue of which requirements are imposed on a person; or (b) to make an order or direction under any enactment.
- (7) Information relating to any action taken or to be taken in connection with the prevention, investigation or prosecution of crime.

Notice of any urgent business

To ensure greater transparency in decision-making, 28 clear days public notice of the decisions to be made both in public and private has been given for these agenda items. Any exceptions to this rule are the urgent business items on the agenda marked *. For such items it was impracticable to give sufficient notice for a variety of business and service reasons. The Chairman of the Executive Scrutiny Committee has been notified in writing about such urgent business.

Notice of any representations received

No representations from the public have been received regarding this meeting.

Date notice issued and of agenda publication

7 February 2018
London Borough of Hillingdon

Agenda

- 1 Apologies for Absence
- 2 Declarations of Interest in matters before this meeting
- 3 To approve the minutes of the last Cabinet meeting 1 - 6
- 4 To confirm that the items of business marked Part 1 will be considered in public and that the items of business marked Part 2 in private

Cabinet Reports - Part 1 (Public)

- 5 Report from Social Services, Housing & Public Health Policy Overview Committee on Hospital Discharges (Cllr Philip Corthorne) 7 - 38
- 6 Report from the Children's, Young People and Learning Policy Overview Committee on Supporting Children with SEND in their Early Years (Cllr David Simmonds CBE) 39 - 66
- 7 Monthly Council Budget Monitoring Report: Month 9 (Cllr Jonathan Bianco) 67 - 110
- 8 The Council's Budget - Medium Term Financial Forecast 2018/19 - 2022/23 (Cllr Ray Puddifoot MBE & Cllr Jonathan Bianco)
TO RECOMMEND TO FULL COUNCIL
(report circulated on Agenda B)
- 9 The Schools Budget 2018/19 (Cllr David Simmonds CBE, Cllr Jonathan Bianco & Cllr Ray Puddifoot MBE)
(report circulated on Agenda B)
- 10 Standards and Quality of Education in Hillingdon during 2016/17 (Cllr David Simmonds CBE) 111 - 152
- 11 Hillingdon's response to the draft London Plan (Cllr Keith Burrows) 153 - 210
- 12 Dynamic Purchasing Vehicle for Children's Residential Homes, SEN Provision and Independent Fostering Agencies (Cllr David Simmonds CBE) 211 - 218

Cabinet Reports - Part 2 (Private and Not for Publication)

- | | | |
|-----------|--|-----------|
| 13 | Disposal of Garage Site at rear of 65 Worcester Road, Cowley
(Cllr Jonathan Bianco) | 219 - 224 |
| 14 | Environmental Cleaning Contract (Cllr Keith Burrows) | 225 - 230 |
| 15 | Contract for Resident Card Payment Services - Housing & Revenues
(Cllr Jonathan Bianco) | 231 - 236 |
| 16 | Voluntary Sector Leases (Cllr Jonathan Bianco) | 237 - 248 |

The reports listed above in Part 2 are not made public because they contains exempt information under Part 1 of Schedule 12A to the Local Government (Access to Information) Act 1985 (as amended) and that the public interest in withholding the information outweighs the public interest in disclosing it.

- 17** Any other items the Chairman agrees are relevant or urgent

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Minutes

Cabinet

Thursday, 25 January 2018

Meeting held at Committee Room 6 - Civic Centre,
High Street, Uxbridge UB8 1UW



HILLINGDON
LONDON

Published on: 26 January 2018

Decisions come into effect from 2 February 2018

Cabinet Members Present:

Ray Puddifoot MBE (Chairman)
David Simmonds CBE (Vice-Chairman)
Douglas Mills
Jonathan Bianco
Richard Lewis
Philip Corthorne

Members also Present:

Susan O'Brien
Nick Denys
Wayne Bridges
Jane Palmer
Richard Mills
John Riley
Henry Higgins
Peter Curling
Peter Money
John Morse

1. APOLOGIES FOR ABSENCE

Apologies were received Councillor Keith Burrows.

2. DECLARATIONS OF INTEREST IN MATTERS BEFORE THIS MEETING

No interests in matters before the meeting were declared.

3. TO APPROVE THE MINUTES OF THE LAST CABINET MEETING

The decisions and minutes of the Cabinet meeting held on 14 December 2017 were agreed as a correct record.

4. TO CONFIRM THAT THE ITEMS OF BUSINESS MARKED PART 1 WILL BE CONSIDERED IN PUBLIC AND THAT THE ITEMS OF BUSINESS MARKED PART 2 IN PRIVATE

This was confirmed as set out on the agenda.

5. REVIEW INTO CRIMINALISATION OF LOOKED AFTER CHILDREN: REPORT FROM THE EXTERNAL SERVICES SCRUTINY COMMITTEE

The Chairman of the External Services Scrutiny Committee attended to present his Committee's review into the criminalisation of Looked after Children, which was endorsed by Cabinet.

RESOLVED:

That Cabinet:

- 1. Notes the report of the External Services Scrutiny Committee on the criminalisation of looked after children (LAC);**
- 2. Gives consideration to increased opportunities for children in care to participate in local activities as set out in the report; and**
- 3. Encourages Councillors to actively promote awareness and advancement of LAC in the Borough.**

Reason for decision

Cabinet welcomed the review of the Committee which had gathered information from witnesses about the work that was being undertaken to address the labelling and criminalisation of Looked after Children given their over-representation within the criminal justice system. Cabinet noted the work that had already been undertaken in Hillingdon, acknowledging that continued partnership-working, particularly with the Police, was critical in order to continue to support and safeguard Looked after Children.

Alternative options considered and rejected

None.

Officers to action:

Tony Zaman, Social Care (implementation)
Nikki O'Halloran, Chief Executive's Office (monitoring)

Classification: Public

The report and any background papers relating to this decision by the Cabinet are available to view on the Council's website or by visiting the Civic Centre, Uxbridge.

6. MONTHLY COUNCIL BUDGET MONITORING REPORT: MONTH 8

RESOLVED:

That Cabinet:

- 1. Note the forecast budget position as at November 2017 (Month 8).**
- 2. Note the Treasury Management update as at November 2017 at Appendix E.**

3. Continue the delegated authority up until the February 2018 Cabinet meeting to the Chief Executive to approve any consultancy and agency assignments over £50k, with final sign-off of any assignments made by the Leader of the Council. Cabinet are also asked to note those consultancy and agency assignments over £50k approved under delegated authority between the 14 December 2017 and 25 January 2018 Cabinet meetings, detailed at Appendix F.
4. Accepts the award of £221,100 from the Heritage Lottery Fund for the Cranford Park project and instructs officers to proceed with the Development Phase.
5. Approve acceptance of new burdens funding from DCLG in respect of the Homelessness Reduction Act. Hillingdon's three-year allocation totals £783,103, to be paid over three financial years (2017/18, 2018/19, 2019/20).
6. Approve acceptance of gift funding in relation to a Planning Performance Agreement on the following major development in accordance with the provisions of Section 93 of the Local Government Act 2003:
 - a. Northwood College, Girls Day School, Maxwell Road, Northwood (£15,000)
7. Agree that the Council donates £14,000 to the Mayor of Hillingdon's Charitable Trust to support local good causes, funded from the proceeds of kerbside textile waste collection and matched funding from the HIP Initiatives budget.
8. Approve introduction of fees & charges relating to admission and guided tours at the new Battle of Britain Bunker Visitor Centre, as set out in appendix G. The new charges will apply from March 2018.
9. Note the increase of 20% to nationally set planning fees charged and removal of the requirement for exemptions from fees for applications received after Article 4 directions and after removal of Permitted Development rights with effect from 17 January 2018, following direction from the Ministry of Housing, Communities and Local Government in December 2017.
10. Ratify urgent decisions taken by the Leader of the Council on 8 January 2018 and set out in Appendix I for the London Borough of Hillingdon to opt into the London Business Rates Pilot Pool and enter into a Memorandum of Understanding to establish the operation of the Pilot Pool, along with approval of local processes for subsequent decisions affecting the Pilot Pool.
11. Ratify a special urgency decision taken by the Leader of the Council and Cabinet Member for Finance, Property and Business Services on 18 January 2018 to authorise the grant of a new lease for 99 years, to Scottish & Southern Electricity Networks for a substation site at Grassy Meadow, Hayes, on the terms outlined in the report and to instruct Legal Services to complete the appropriate lease documentation.
12. Agree in principle a grant of £125k to provide match-funding towards the building of a new Hut for the 2nd/9th Ruislip Scout Group to be funded from the 2017/18 Youth Provision Capital Budget, noting that this is subject to planning advice being satisfactory and, therefore, agrees to delegate final authority to award the grant to the Deputy Chief Executive and Corporate Director of Residents Services, in consultation with the Leader of the Council and Cabinet Member for Finance, Property and Business Services.

Furthermore, that Cabinet agree an exceptional waiver of the usual capital release reporting requirements for this, to enable any grant payment to be expedited.

Reasons for decision

Cabinet was informed of the latest Month 8 forecast revenue, capital and treasury position for the current year 2017/18 to ensure the Council achieved its budgetary and service objectives. Additionally, Cabinet accepted some external grants and funding, noting the success in receiving support from the Heritage Lottery Fund towards enhancements in Cranford Park. Furthermore, Cabinet agreed to donate monies to the Mayor's Charity from proceeds of the kerbside textile waste recycling, updated planning applications fees and also new charges for the new Battle of Britain Bunker Visitor Centre, which would be free for Hillingdon residents.

Additional recommendations were moved and agreed to ratify a recent decision to lease an electricity substation to enable the development of the Grassy Meadows scheme and also to award, in principle, a grant to the 2nd/9th Ruislip Scouts Group towards the cost of their new premises.

Alternative options considered and rejected

None.

Officer to action:

Paul Whaymand, Finance

Classification: Public

The report and any background papers relating to this decision by the Cabinet are available to view on the Council's website or by visiting the Civic Centre, Uxbridge.

7. REPLACEMENT OF PASSENGER LIFTS INSTALLED IN THE COUNCIL SHELTERED HOUSING PROPERTIES

RESOLVED:

That the Cabinet agrees to accept the tender received from Otis Limited (Trading as Express Lifts Alliance Group) for the replacement of the seven passenger lifts installed within Mandela Court, Uxbridge, Wallis House, Ruislip, Ascott Court, Eastcote, Missouri Court, Eastcote and Sibley Court, Uxbridge, for the value of £532,060 based upon the Council's specification.

Reasons for decision

Cabinet accepted the most economically advantageous tender for the replacement of 7 passenger lifts installed in the Council's sheltered housing properties at Mandela

Court, Uxbridge, Wallis House, Ruislip, Ascott Court, Eastcote, Missouri Court, Eastcote and Sibley Court, Uxbridge.

Alternative options considered and rejected

None, as the lifts were considered to be beyond economic repair and at the end of their operational life expectancy.

Officer to action

Gary Penticost, Residents Services

Classification: Private

Whilst the Cabinet's decisions above are always made public, the officer report relating to this matter is not because it was considered in the private part of the meeting and contained information relating to the financial or business affairs of any particular person (including the Authority holding that information) and the public interest in withholding the information outweighed the public interest in disclosing it (exempt information under paragraph 3 of Part 1 of Schedule 12A to the Local Government (Access to Information) Act 1985 as amended).

8. THE COUNCIL'S MAIN PRINT SERVICE AND THE PRINTING OF HILLINGDON PEOPLE

RESOLVED:

That Cabinet:

- 1. Accept the Tender from Gpex for Lot 1 for the provision of main printing services to the Council for a period of three years with the option to extend for a further one year, subject to satisfactory performance.**
- 2. Accept the Tender from Paragon Service Point for Lot 2 for the print of Hillingdon People for a period three years with the option to extend for a further one year, subject to satisfactory performance.**

Reasons for recommendation

Following a competitive procurement exercise, Cabinet agreed to accept the most economically advantageous tenders for the main printing contract across all council service areas, and also the printing for the Hillingdon People resident magazine. It was noted that overall print costs had declined significantly over recent years due to digital communication and proactive management of printed matter, however, the requirement to print certain publications and official legal and other documents still remained.

Alternative options considered and rejected

None.

Officers to action:

Charlotte Stamper / Emma Gilbertson, Residents Services

Classification: Private

Whilst the Cabinet's decisions above are always made public, the officer report relating to this matter is not because it was considered in the private part of the meeting and contained information relating to the financial or business affairs of any particular person (including the Authority holding that information) and the public interest in withholding the information outweighed the public interest in disclosing it (exempt information under paragraph 3 of Part 1 of Schedule 12A to the Local Government (Access to Information) Act 1985 as amended).

9. ANY OTHER ITEMS THE CHAIRMAN AGREES ARE RELEVANT OR URGENT

No additional items were considered by the Cabinet.

The meeting closed at 7:18pm.

Internal Use only - implementation of decisions

Meeting after Cabinet, the Executive Scrutiny Committee did not call-in any of the Cabinet's decisions.

All decisions of the Cabinet can, therefore, be implemented by officers upon the expiry of the scrutiny call-in period which is from 5pm, Friday 2 February 2018.

Officers to action the decisions are indicated in the minutes.

The public part of this meeting was broadcast on the Council's YouTube channel [here](#). Please note that these minutes and decisions are the definitive record of proceedings by the Council of this meeting.

If you would like further information about the decisions of the Cabinet, please contact the Council below:

democratic@hillingdon.gov.uk

Democratic Services: 01895 250636

Media enquiries: 01895 250403

To find out more about how the Cabinet works to put residents first, visit [here](#).

SOCIAL SERVICES, HOUSING AND PUBLIC HEALTH POLICY OVERVIEW COMMITTEE: *REVIEW INTO HOSPITAL DISCHARGES*

Cabinet Member(s)	Councillor Philip Corthorne
Cabinet Portfolio(s)	Social Services, Housing, Health & Wellbeing
Officer Contact(s)	Mark Braddock / Nikki O'Halloran - Chief Executive's Office
Papers with report	Social Services, Housing and Public Health Policy Overview Committee review into Hospital Discharges

HEADLINES

Summary	To receive the Social Services, Housing and Public Health Policy Overview Committee's review into Hospital Discharges and to give consideration to the recommendations of the review.
Putting our Residents First	This report supports the following Council objective of: <i>Our People</i>
Financial Cost	None arising from the recommendations
Relevant Policy Overview Committee	Social Services, Housing and Public Health
Relevant Ward(s)	All

RECOMMENDATIONS

That Cabinet welcomes the Committee's findings from their review into Hospital Discharges and supports the following recommendations from the Committee:

Policy Overview Committee Recommendations

- (i)
 - a) That clear information about the discharge process is developed for, and with people admitted to hospital and their families, so that they know what to expect.
 - b) That this information is provided to patients on admission, as agreed through a joint working policy.
- (ii)
 - a) That a joint working policy across all partners involved in the hospital discharge process is developed to clarify the roles and responsibilities of the appropriate teams within each organisation and to ensure consistency of approach.
 - b) That briefings with staff across organisations on the content of the agreed joint working policy are undertaken.

- (iii) That partners explore options for delivering a more integrated intermediate care service that ensures that people admitted to hospital are supported to go home by the most appropriate professional first time and that the number of hand-offs between different organisations is reduced.
- (iv) That partners explore affordable options to enable people who are medically fit for discharge are able to step down from hospital without the need to be admitted to a care home.
- (v) That partners explore affordable options that will ensure an appropriate supply of care home places to address the needs arising from Hillingdon's changing population.
- (vi) That partners explore affordable options for ensuring that people admitted to hospital and their families have access to advocacy to support them in making informed decisions about how their future care needs will be met, including the care setting.
- (vii) That Healthwatch Hillingdon consider undertaking a further review of the patient experience of the discharge process at Hillingdon Hospital in a year's time.
- (viii) That a progress report be provided to the Social Services, Housing & Public Health Policy Overview Committee six months after the implementation of the review's recommendations, that includes an update on the above recommendations as well as:
 - Number/% of Delayed Transfers Of Care in Hillingdon Hospital attributed to patient/family choice;
 - % of Continuing Healthcare assessments taking place in a hospital setting;
 - Number/% of patients discharged before midday 7 days a week.

Reasons for recommendations

The objective of the review was to examine the discharge process from Hillingdon Hospital for people over the age of 65 and how people are supported into the least restrictive care setting in order to maximise their independence and safely meet their needs. The recommendations, if adopted, will make improvements to the process, both for patients, in terms of their care, and for the health and care system, e.g. by reducing the increased costs associated with longer lengths of stay in hospital.

Alternative options considered / risk management

The Cabinet could decide to reject some or all of the Committee's recommendations.

SUPPORTING INFORMATION

- 1) There is a national problem regarding delays in hospitals being able to discharge people whose medical needs no longer require them to be cared for in a hospital setting. There are many reasons for this, dependent on the individual circumstances of the person concerned.
- 2) Statistics for 2015/16 indicated that there were over 4,000 delayed days in hospital for Hillingdon residents and/or people registered with a Hillingdon GP aged 18 and over. Research did show, that the longer an older person is in hospital, not only are they likely to become increasingly confused but there is also an increasing risk of them contracting a hospital acquired infection. In addition, delays in discharging people who are medically fit or medically stable adds increasing pressure on hospital bed provision, which can lead to higher costs due to the necessity of opening escalation wards. This also increases hardship on other residents due to cancellation of planned health procedures as bed capacity is used to support admissions through Accident & Emergency.
- 3) The Committee was made aware that, according to NHS England, nationally everyday, more than 6,000 patients who were well enough to leave hospital were unable to do so because of insufficient local care models. With the number of health and social care professionals involved in the care of the elderly, “joined-up care” between all agencies remained the single most important feature for ensuring greater patient safety and efficient hospital discharge planning.
- 4) The Terms of Reference of the review were:
 1. To gain a comprehensive understanding of current discharge activity in respect of the 65 and over population and focusing on Hillingdon Hospital.
 2. To investigate best practice on what the ideal discharge pathway would look like.
 3. To gather evidence from Healthwatch Hillingdon about the resident/patient experience of hospital discharge.
 4. To explore the key issues and challenges that inhibits a smooth hospital discharge process and pathway.
 5. To particularly examine the issues faced in meeting the needs of residents/patients with mental health needs and the impact on the broader discharge process.
 6. To consider national and regional initiatives, e.g. London and North West London, being undertaken to improve the hospital discharge process and pathway.
 7. To examine the work being undertaken by the Council and NHS and third sector partners to improve the resident/patient experience of hospital discharge.
 8. To report to Cabinet any positive recommendations or conclusions arising from the review.

Officer Comments on Recommendations

From the evidence the Committee heard, there were a number of issues and challenges that posed obstacles to a smoother discharge process and pathway in Hillingdon. There was inconsistency in how quickly the discharge planning process starts, which means that complexities about a person's personal circumstances and their health and care needs are not

identified at an early enough stage to enable them to be discharged as soon as they no longer need to be in hospital.

With the number of agencies involved in patient care, there needs to be an agreed policy and procedure that clarifies the roles and responsibilities of all agencies involved in the discharge process. Included in this is the need for clear and easy to understand information for patients about what to expect. Health and social care staff also need to give a consistent message to enable patients, their carers and families to make informed choices. This would also help to address unrealistic expectations and could help to prevent difficulties later over choices that may or may not be available.

Joint working is essential for the effective management of discharge from hospital. In some cases, decisions on the best care for an individual following discharge from hospital are based on a professional assessment of the patient's health, social care and housing needs. It is therefore important that the input from these professionals is coordinated effectively and promptly. Protocols and processes need to be joined up, consistent, sending the same message to patients, to ensure that clear information is given to patients.

A single point of access for discharge would greatly improve the communication to the patient / carer and also avoid duplication, which often happens.

Delivering the recommendations

The recommendations in this report are reflected in the Delayed Transfers of Care (DTC) action plan that Hillingdon was required to submit to NHS England under the conditions of the 2017/19 Better Care Fund. The delivery of the plan is overseen by a multi-agency task and finish group chaired by a director from the Hospital and reporting into a discharge executive comprising of the Chief Operating Officers of the Hospital and the CCG, the Deputy Chief Operating Officer of CNWL and the Council's Corporate Director of Adult, Children and Young People's Services.

Financial Implications

There are no direct financial implications arising from the recommendations set out in this report.

RESIDENT BENEFIT & CONSULTATION

The benefit or impact upon Hillingdon residents, service users and communities?

If agreed, it is anticipated that the recommendations will help to improve the process for patients and partner organisations involved in the health and care system.

Consultation carried out or required

Consultation was carried out during the course of the review with a number of witnesses as specified in the attached report.

CORPORATE CONSIDERATIONS

Corporate Finance

Corporate Finance has reviewed this report, noting that there are no direct financial implications arising from the recommendations presented to Cabinet. As outlined above, the recommendations of the Policy Overview Committee in respect of Delayed Transfers of Care have been incorporated into the 2017/18 - 2018/19 Better Care Fund Plan which was submitted jointly by the Council and local health partners.

Legal

The Borough Solicitor confirms that there are no specific legal implications arising from this report.

BACKGROUND PAPERS

NIL.

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Hospital Discharge



A review by the Social Services, Housing and Public Health Policy Overview Committee

Councillors on the Committee: Wayne Bridges (Chairman), Jane Palmer (Vice Chairman), Shehryar Ahmad-Wallana, Teji Barnes, Peter Davis, Beulah East, Tony Eginton, Becky Haggar and Peter Money. Mary O'Connor (Co-Opted Member).

2016-2017



HILLINGDON
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Chairman's Foreword



The number of people aged 65 years old and over in England is increasing, which with this changing demographic, is having an impact on the number of older people being admitted to hospital. This increased demand for health services, combined with reduced health funding is putting pressure on the health and social care system.

The aim of the review was to examine the discharge process from Hillingdon Hospital for the over 65s, in an attempt to look at ways of improving the process, both for patients, in terms of their care, and for the authorities in terms of increased costs from longer than needed stays in hospital.

Delays in discharging people from hospital who are medically fit adds increasing pressure on hospital bed provision, which impacts on residents who require beds for planned health procedures and those admitted through Accident & Emergency.

The review sought the views of the Council's Health and Social Care professionals, Healthwatch Hillingdon for the patient perspective and of health service partners. There are many initiatives which are already in place by organisations to improve the process of discharge from hospital and to make the process simpler and easier to understand for patients and their carers. The recommendations of the review aim to improve the process further.

I would like to thank officers for their support during the review, and also thank the witnesses and officers who assisted to help the Committee in preparing its findings for Cabinet.

Councillor Wayne Bridges

Chairman of the Social Services, Housing and Public Health Policy Overview Committee

Summary of recommendations to Cabinet

Through the witnesses and evidence received during the detailed review by the Committee, Members have agreed the following recommendations to Cabinet:

<p>1</p>	<p>a) That clear information about the discharge process is developed for, and with people admitted to hospital and their families, so that they know what to expect.</p> <p>b) That this information is provided to patients on admission, as agreed through a joint working policy.</p>
<p>2</p>	<p>a) That a joint working policy across all partners involved in the hospital discharge process is developed to clarify the roles and responsibilities of the appropriate teams within each organisation and to ensure consistency of approach.</p> <p>b) That briefings with staff across organisations on the content of the agreed joint working policy are undertaken.</p>
<p>3</p>	<p>That partners explore options for delivering a more integrated intermediate care service that ensures that people admitted to hospital are supported to go home by the most appropriate professional first time and that the number of hand-offs between different organisations is reduced.</p>
<p>4</p>	<p>That partners explore affordable options to enable people who are medically fit for discharge are able to step down from hospital without the need to be admitted to a care home.</p>
<p>5</p>	<p>That partners explore affordable options that will ensure an appropriate supply of care home places to address the needs arising from Hillingdon's changing population.</p>

<p>6</p>	<p>That partners explore affordable options for ensuring that people admitted to hospital and their families have access to advocacy to support them in making informed decisions about how their future care needs will be met, including the care setting.</p>
<p>7</p>	<p>That Healthwatch Hillingdon consider undertaking a further review of the patient experience of the discharge process at Hillingdon Hospital in a year's time.</p>
<p>8</p>	<p>That a progress report be provided to the Social Services, Housing & Public Health Policy Overview Committee six months after the implementation of the review's recommendations, that includes an update on the above recommendations as well as:</p> <ul style="list-style-type: none"> ● Number/% of Delayed Transfers Of Care in Hillingdon Hospital attributed to patient/family choice; ● % of Continuing Healthcare assessments taking place in a hospital setting; ● Number/% of patients discharged before midday 7 days a week.

Background to the review

The objective of the review was to examine the discharge process from Hillingdon Hospital and how people are supported into the least restrictive care setting in order to maximise their independence and safely meet their needs.

The focus of the review was on Hillingdon Hospital where around 80% of the people admitted were from within the Borough of Hillingdon. Of those admitted as emergencies, almost 30% were of people aged 65 and over and registered with Hillingdon GPs. The Committee agreed that this age profile would be the focus of the review.

Reasons for the review and current position

There is a very high national profile regarding delays in hospitals being able to discharge people whose medical needs no longer require them to be cared for in a hospital setting.

During 2015/16 there were 50,696 admissions to The Hillingdon Hospitals NHS Foundation Trust's (THH) beds. Whilst 25,256 admissions were planned for (also known as elective procedures), 25,440 were admitted as emergencies (also known as non-elective admissions) and of these nearly 30% (7,593) were of people aged 65 and over registered with a Hillingdon GP.

Approximately 80% of the people admitted to THH are Hillingdon residents and for admissions of people aged 65 this was almost 83% being Borough residents. Other admissions come mainly from other parts of North West London. 85% of Adult Social Care hospital-related activity comes from Hillingdon Hospital and the remainder comes mainly from Northwick Park and Ealing Hospitals.

In 2015/16 there were 4,196 delayed days for Hillingdon residents and/or people registered with a Hillingdon GP aged 18 and over. Research shows that the longer an older person is in hospital not only are they likely to become increasingly confused but there is also an increasing risk of them contracting a hospital acquired infection. In addition, delays in discharging people who are medically fit or medically stable adds increasing pressure on hospital bed provision, which can lead to higher costs due to the necessity of opening escalation wards. This also increases hardship on other residents due to cancellation of planned health procedures as bed capacity is used to support admissions through Accident & Emergency.

Current context

The Committee was informed that changes in the levels of activity in the last two years had increased patients delayed transfer to care. Reference was made to research which showed that the longer an elderly person was in hospital, they were more likely to become increasingly confused, and there was also an increasing risk of them contracting a hospital acquired infection.

In addition, delays in discharging people who were medically fit added increasing pressure on

hospital bed provision, which could lead to higher costs.

The Committee was made aware that according to NHS England (NHSE), nationally everyday, more than 6,000 patients who were well enough to leave hospital were unable to do so because of insufficient local care models. With a 23% rise of delays in discharge nationally since June 2015, “joined-up care” remained the single most important feature for ensuring greater patient safety and efficient hospital discharge planning.

The National Audit Office (NAO) estimated the cost to the NHS of older patients in hospital beds, no longer in need of acute treatment, totalled £820 million every year. Longer stays in hospital also led to increased social care costs.

Evidence & Witness Testimony

Avoiding Hospital Admission

The Committee identified that the most effective method for addressing a hospital admission is to prevent it from occurring in the first place. The Committee was informed of the initiatives which were currently in progress, which are intended to achieve this and these included:

Development of an anticipatory model of care for older people - Under this new model older people identified as being at risk of hospital admission are invited into their GP surgery to explore completion of a care plan. The process of care planning is intended to identify what interventions may prevent an escalation of need. A multi-disciplinary team (MDT) approach for people with more complex needs, e.g. an approach that involves professionals from different health and care organisations, seeks to identify solutions that will prevent or delay further escalation of need and enable management of the person in their usual place of residence.

Better Care Fund Plan (BCF) - A key priority of Hillingdon's 2016/17 BCF is the prevention of admission to hospital and this is reflected in its eight schemes that look at issues such as addressing the needs of older people at risk of falls, stroke, dementia and/or social isolation, preventing admissions to hospital from care homes and supporting people at home who have had an escalation of need but do not require admission to hospital.

The Ideal Hospital Discharge Pathway

In December 2015, the National Institute of Health and Care Excellence published guidance on the transition between inpatient hospital settings and community or care home settings-for-adults-with-social-care-needs <https://www.nice.org.uk/guidance/ng27>. This identified the key components of good discharge practice as being:

- a) Starting discharge planning early;
- b) Maintaining the momentum of treatment while in hospital, e.g. increasing the number of people discharged before midday and at weekends;
- c) Multi-disciplinary assessments between health and social care providers; and
- d) Undertaking assessments of older person's long-term care needs in the most appropriate setting, ideally in their own home.

If local systems are working well then there will be low levels of delayed transfers of care and

also low levels of readmissions.

Delayed Transfers of Care (DTC)

A delayed transfer of care occurs when a patient is ready for transfer from a hospital bed, but is still occupying such a bed. A patient is ready for transfer when:

- a) A clinical decision has been made that the patient is ready for transfer; AND
- b) A multi-disciplinary team decision has been made that the patient is ready for transfer; AND
- c) The patient is safe to discharge/transfer.

Reference was made to the Care Act which set out a formal process for the notification of local authorities where a person with potential social care needs requires an assessment prior to discharge. This is the assessment notice and discharge notice process that was previously known as the 'section 2s' and '5s' process under the Community Care (Delayed Discharge) Act, 2003. The purpose of the discharge notice is to confirm the date of discharge. The Council can be fined where it is responsible for appropriate measures to facilitate a discharge on the discharge date not being in place. The Care Act makes fines discretionary and the Council is working with Hillingdon Hospital to establish a no fine agreement.

The Committee was provided with DTC breakdown for 2015/16 and the Q1 2016/17 outturn position and in summary, in 2015/16 Hillingdon had the 12th lowest level of delayed transfers of care in London and the lowest out of the eight Boroughs in North West London. In Q1 2016/17 Hillingdon's position had changed to having the 13th highest in London and the fourth highest in North West London. A contributory factor to this revised position had been a change in reporting practice, e.g. reporting as DTCs delays that do not fall within the DTC definition and partners are currently looking at this.

Services Supporting Timely Hospital Discharge

The Committee was informed that there was a wide range of services currently in place to support discharge from hospital which comprised of home based services and bed based services.

These included the following:

a) Integrated Discharge Team

During 2015/16 an integrated discharge team was set up in the Acute Medical Unit (AMU) to identify adults with care needs as soon as they are admitted to hospital and to take a more proactive and joint approach between health and social care to discharge management. The team includes Hospital discharge coordinators, an occupational therapist, social workers and admin support. Social work staff within this team now actively visit other adult wards within THH seeking to identify people who may have social care needs in order to expedite the discharge

planning process.

b) Homesafe

This is led by Hillingdon Hospital through the Care of the Elderly Team (COTE). The service entails older people aged 65 and over who are admitted through the Emergency Department being screened and receiving a comprehensive geriatric assessment (CGA).

c) Community Homesafe

The nursing, therapeutic and care needs for people aged 65 and over who have undergone a CGA are met for up to 10 days by the Community HomeSafe clinicians (the service is provided by CNWL) to facilitate clinically appropriate and timely discharge from acute care. People with lower level support needs are referred to the Age UK Take Home and Settle element of HomeSafe.

d) Reablement

The Reablement Service is provided by the Council and is intended to assist people to learn or relearn day to day living tasks following an escalation of needs. The service is provided for up to six weeks and is non-chargeable. During Q1 2016/17 the Reablement Team received 227 referrals, and of these 176 were from hospitals, primarily Hillingdon Hospital. During this period, 102 people were discharged from Reablement with no ongoing social care needs.

e) Rapid Response

This service is provided by Central and North West London NHS Foundation Trust is based in the community and provides 'in reach' to the Emergency Department at THH. It provides nursing, therapeutic and care needs for up to 10 days and has a fast track referral process to the LBH to establish packages of care or reablement. In Q1 2016/17 the Rapid Response Team received 886 referrals and 56% (500) of these came from Hillingdon Hospital. The remaining 44% came from a variety of sources within the community, e.g. 19% (169) from GPs, 11% (99) from community services such as District Nursing and the remaining 13% (118) came from a combination of the London Ambulance Service (LAS), care homes and self-referrals. Of the 500 referrals received from Hillingdon Hospital, 340 (68%) were discharged with Rapid Response input, 138 (28%) following assessment were not medically cleared for discharge and 22 (4%) were either out of area or inappropriate referrals.

f) Hawthorne Intermediate Care Unit (HICU)

This 22-bed unit on the Hillingdon Hospital main site is provided by CNWL and provides short-term rehabilitation, typically for up to 6 weeks. Medical input is from the THH COTE consultants and the unit is staffed by a multidisciplinary team, including nurses, physiotherapists, occupational therapists, a ward pharmacist and an activities coordinator.

g) Bridging Care Service

This service is provided by Harlington Hospice and enables people with stable health needs to be discharged from Hospital pending an assessment to determine their ongoing care needs.

h) Franklin House Step-down beds

These beds are provided by Care UK for people who are medically stable and are a) on a rehabilitation pathway, need a bed-based service but are unable to weight bear for 3 weeks or more; or b) are undergoing an assessment for continuing healthcare (CHC) which has not yet been completed.

i) Cottesmore Step-down Flat

Run by the Council in Cottesmore House extra care scheme, this flat provides an alternative setting to a care home to enable older people to step down from hospital and relearn daily living skills before returning home. The stay in this flat is for up to six weeks.

j) Home Treatment Service

This service is provided by CNWL and is intended to support people with severe mental health conditions, including dementia, at home for up to 14 weeks.

k) Community Rehab

This service is provided by CNWL and comprises of nurses, physiotherapists, occupational therapists, speech and language therapists, dietitians and rehabilitation assistants.

l) Take Home and Settle

This service is provided by Age UK and is intended to take people home, get them settled in and provide support for three days after discharge.

m) Community Equipment Service

This service provides aids of daily living ranging from bath boards to electric hoists and is jointly funded by the Council and the CCG and is provided by Medequip Assistive Technology Ltd.

Preventative Initiatives

The Committee was informed that the most effective method for addressing hospital admission was to prevent hospital admissions from occurring in the first place. The Committee was made aware of a number of preventative initiatives such as the **development of an anticipatory model of care for older people**. This was where older people, who had been identified as being at risk of hospital admission, were invited into their GP surgery to explore the completion of a care plan.

This would identify any interventions which might prevent an escalation of need.

For people with more complex needs, a multi-disciplinary team (MDT) approach was taken. For example, an approach which would involve professionals from different health and care organisations, seeking to identify solutions which would prevent or delay further escalation of need and enable the management of the person in their usual place of residence. Reference was made to H4All (a consortium of local third sector organisations) who played a crucial role in this initiative.

A key priority of Hillingdon's 2016/17 Better Care Fund Plan (BCF) was the prevention of admission to hospital and this was reflected in its eight schemes that looked at issues such as addressing the needs of older people at risk of falls, stroke, dementia and/or social isolation, preventing admissions to hospital from care homes and supporting people at home who have had an escalation of need but did not require admission to hospital. This initiative involved cross over work with what was happening in GP surgeries.

Reference was made to the work of LondonADASS, who were working in collaboration with NHSE and the Local Government Association to support local systems to improve the performance of hospital discharges. The Hospital Admission and Discharge Pathways Network had been created which aimed at developing and sharing good practise in addressing delayed transfers.

Discussion took place on communications with the family of the patient and whether families were given details of options in terms of different care homes. The Head of Social Work reported that there was online information available for families and early discussions took place on patient pathways.

Clinical Commissioning Group (CCG)

The Chief Operating Officer from the CCG, informed the Committee that the Clinical Commissioning Group was a clinically-led statutory NHS bodies responsible for the planning and commissioning of health care services for their local area.

Commissioning was about getting the best possible health outcomes for the local population, by assessing local needs, deciding priorities and strategies, and then buying services on behalf of the population from providers such as hospitals, clinics, community health bodies, etc.

The Chief Operating Officer of Hillingdon Clinical Commissioning Group reported that there had been a 12% increase in the over 80s age group attending Accident & Emergency at Hillingdon Hospital. With an ageing population and the increase in the number of dementia cases, the planning of hospital discharges had become challenging. It was important that the needs of the patients were clearly identified and there needed to be a consistency of processes to enable all agencies to identify who was accountable for providing particular elements of care and support.

Care Planning was vital with an overarching Care Plan for each person. This required close working with social care professionals and the timely carrying out of processes.

The Committee was informed that as hospitals were busy, often there was reactive, rather than proactive responses to people's needs. The aim should be to work closely with partners to get patients home sooner and help combat the growing pressures the hospital was experiencing, which were being exacerbated by delayed transfers of care.

The transfer of care planning requirements should improve patient experience and quality of care and enable all medically fit patients to be discharged with appropriate care and support at home, wherever possible. This would reduce delayed transfers of care and lower the readmissions of patients.

Continuing Healthcare Team

The Clinical Team Leader for the Continuing Healthcare Team reported to the Committee that Continuing Healthcare (CHC) was the name given to a package of care which was arranged and funded solely by the NHS for individuals outside of hospital who had ongoing health care needs.

Adult Continuing Healthcare was provided when an individual had been assessed by a multi-disciplinary team and they had been deemed to have a primary health need. After this had been defined, a package of care would be developed.

The Committee was informed that continuing healthcare was available in any setting to meet assessed needs, including the patient's own home or a care home. Reference was made to assessments for continuing healthcare being triggered when a person was admitted to hospital. A person who was eligible for CHC would typically have complex health conditions and would be eligible for NHS care. If a person was not entitled to NHS care they would be eligible for means tested local authority social care.

Reference was made to the decision-making process which should always be centred on the person requiring the care. This meant putting the individual and their views about their needs and the care and support required at the centre of the process.

A Checklist Tool was used, which was a screening tool used to assess whether a full assessment of eligibility for continuing healthcare was required. Once the Checklist had been completed and it indicated that there was a need to carry out a full assessment of eligibility for NHS continuing healthcare, the individual completing the Checklist would contact the Clinical Commissioning Group (CCG) who would arrange for a multidisciplinary team to carry out an up-to-date assessment of the person's needs.

The Committee was informed that because hospitals were very busy, unfortunately it was inevitable that there would be delays. It was important that families of patients and the hospital

were involved in discussions regarding eligibility for care but that expectations of families should be managed due to issues of choice of care and the cost of care packages.

A lack of clarity for patients and their families about care choices, including the funding of care, was identified as a cause of some delays in discharge. It was recognised that this could be addressed by the availability of better information at an earlier stage in order to manage expectations. The Committee was informed that addressing this was included within the DTOC action plan for 2016/17.

The Committee was informed that eligibility criteria assessments had to be completed within 30 days, but disputes between parties sometimes resulted in delays. Making decisions on a relative with health needs was a stressful and upsetting time for family members, with disagreements sometimes taking place in relation to making the right health care choices for their elderly relative. The important role that Advocacy Services would play in the process was noted.

Hillingdon Hospital

The Committee received evidence from the Deputy Director of Nursing, the Director of Integrated Care and a Consultant Geriatrician from Hillingdon Hospital.

For the over 65s age group, the average length of stay in Hillingdon Hospital had increased when compared to 2015/16. The Committee was informed that a Discharge Task Force Programme had been implemented which was a dedicated “task force” group which would be focusing on improvement and transformation. This would undertake a forensic investigation of the discharge process for every ward at the hospital.

The Task Force consisted of 5 individuals, who were mainly drawn internally. Data was collected over 9 weeks and the hospital held a clinical summit reviewing the findings.

The Committee was informed that a number of actions had been taken to improve the efficiency of discharges from hospital. These included appointing patient flow coordinators to help with communication.

Also a trial had taken place on Fleming ward which involved the engagement of patients in managing their own discharge. One of the initiatives involved patients wearing their own clothes. This had a positive outcome with research showing that patients wearing their own clothes spent an average of 0.75 days less in hospital than patients wearing hospital clothes.

Reference was made to the **SAFER** and **Red to Green** schemes, which were two national tools which had been introduced to improve the flow of discharges. SAFER consisted of a Senior Review which was where all patients would receive a consultant review before midday.

All Patients would have an expected discharge date which would be based on the medical

suitability for discharge status agreed by clinical teams. **F - Flow of patients** would commence at the earliest opportunity (by 10am) from assessment units to inpatient wards. **E – Early discharge**, **33%** of the hospital's patients would be discharged from base inpatient wards before midday. Medication to be taken home for planned discharges should be prescribed and with pharmacy by 3pm the day prior to discharge wherever possible to do so. **R – Review**, A weekly systematic review of patients with extended lengths of stay would take place to identify the issues and actions required to facilitate discharge. This would be led by clinical leaders and be supported by operational managers who would help remove constraints that lead to unnecessary patient delays.

The Red to Green scheme was used to signify progress on patient treatment and eventually discharge. A red day was what every patient started off on. Green days were when patients received interventions which supported pathways of care through to discharge, a day when all that was planned or had been requested, had taken place on the day it had been requested, which resulted in a positive experience for the patient. A green day was when a patient received care, which could only be delivered in hospital.

The Committee was made aware of a number of improvements which were being to the Discharge workstream:

- Redrafting of the hospital's Working Together leaflet to encompass all the above mentioned suggestions.
- The development of written information for patients and carers in relation to NHS Continuing Healthcare Assessments.
- The continuation of work in progress to review and revise discharge processes and procedures including prescribing and issuing of medication to take home and the format of Multi-Disciplinary Meetings to aid discharge planning.
- The development of an in-house survey to capture patient and carer feedback and satisfaction scores following discharge.
- Improvements made in relation to communication at patient's bed meetings, the introduction of virtual Multi-Disciplinary Meetings for Mt Vernon wards, the introduction of ward based medication to take home and therapy communication.

Central North West London (CNWL) NHS Foundation Trust

CNWL is an NHS provider of mental health, sexual health, physical health, addictions, eating disorder and learning disability services. The Borough Director and Head of Adult Services provided the Committee with information on CNWL's procedures for hospital discharge.

The Committee was informed that the needs of people with mental health issues were catered for by Liaison Psychiatry who saw patients who presented themselves at Accident & Emergency

with symptoms ranging from self-harm, suicidal ideation to psychotic symptoms. Patients were assessed and sign posted to other services. Patients were also seen in general hospital wards where again they were assessed, staff were advised and help was given with the discharge plan if their mental health needs dictated it.

The Clinical Health Psychology service helped patients who were having serious difficulty coping with an illness or a disability, which impacted on their lives. The Rapid Response Team (RRT) provided a rapid response, 7 days a week in A & E. Assessments were made of patients to facilitate their discharge home. Specifically in relation to patients over the age of 65, RRT

Clinicians attended wards to assess patients and if suitable for discharge, they were discharged under the care of RRT.

The Committee was provided with details of the Homesafe scheme which was commissioned to help facilitate early supported discharge, which included people aged 65 years and over. Through this service, patients had access to therapy, nursing and/or care support, including a night sitting service.

The Committee was informed that the following were areas which had been identified to improve discharges:

- Better information sharing through Information Technology. Sharing information would avoid duplication of assessments. It was important that the service had information of other health issues of patients they were treating with mental health issues.
- The development of 15 Care Connection Teams.
- Reviewing and improving the current Rapid Response Service.
- The establishing of a single point of access.
- Better integration of intermediate care services.

Healthwatch Hillingdon

The Chief Executive Officer of Healthwatch provided the Committee with a summary of the recent review which had been carried out by Healthwatch into hospital discharges from Hillingdon Hospital. The project aimed to gain an understanding of the discharge process from the perspective of the patient. It looked at what went well, and what did not go well.

The project focused on adults over the age of 65 and their experiences of being discharged from Hillingdon Hospital. The methodology of the review was split into three stages. Stage 1 involved 172 patients being interviewed and completing a survey on 17 different wards at the Hospital. Dependent on the condition of the patient, patient's advocates completed the survey.

Stage 2 involved interviewing patients 30 days after being discharged, in which they were asked for their experience of the discharge process and whether their post discharge care had been

adequate. 52 discharged patients/advocates completed the second survey.

Stage 3, Healthwatch met with over 20 organisations who commissioned, or provided care services within hospital and the community for the over 65s in Hillingdon. This stage helped the review to identify and understand the processes and procedures involved in hospital discharges, and the factors, barriers and enablers which contributed to providing patients with a safe Transfer from hospital to being cared for, out in the community.

The Committee was informed that generally the results showed that the over 65s had expressed an overwhelming feeling of pride in the NHS and hospital discharges. However, it was found that staff were working under intense pressure and that care could not always be delivered to the required standard. The review's findings were summarised into three categories:

Communication and Information

Communication between patients / carers and health professionals and the information provided, was sometimes poor. Reference was made to patients being unable to speak to doctors, patients not remembering what had been told to them, patients not knowing which medicines to take, who was coming to see them at home and how to arrange a private care home placement or a care package.

It was suggested that providing clear written information for patients / carers, would improve communication and improve outcomes for patients. It was also reported that the Trust's "Working Together" booklet should include a Patient Journey booklet which provided information for patients / carers.

Process and Procedures

The Committee was informed that the review highlighted that there was a marked difference in the discharge procedures on each ward which meant there were discrepancies on how patients were treated in terms of being prescribed medication and how transport was processed. Examples were given on how some patients had been left many hours without hot food and refreshments, either in the discharge lounge, in their beds or in the ward's day room. The recommendation of the review would be to standardise as far as possible the discharge process across all wards. A standardised process would help both staff and patients and improve the quality of care to patients.

Closer Integration and Joined up Working

There was a perception from patients that organisations did not appear to communicate well with each other or work closely enough. Examples of these were assessments being carried out separately by social services and hospital staff, not all relevant partners being invited to multi-disciplinary team meetings etc. It was important that all organisations were aware of each

other's services and that the effectiveness of the Joint Discharge team was maximised to its fullest. A possible solution could be a single point of access for discharge which would provide an information hub for professionals and provide integrated care for the patient. Discussion took place on the changing demographics of the population with an increasing number of dementia cases in the elderly age group. The number of these cases, made the process of discharge challenging.

Findings & Conclusions

From the evidence the Committee heard there were a number of issues and challenges that currently posed obstacles to a smoother discharge process and pathway in Hillingdon. There is currently inconsistency in how quickly the discharge planning process starts, which means that complexities about a person's personal circumstances and their health and care needs are not identified at an early enough stage to enable them to be discharged as soon as they no longer need to be in hospital. For example, a person requiring adaptations or with other complex accommodation issues that can take a considerable amount of time to resolve.

Assessment for continuing healthcare (CHC) may be triggered following a screening when a person is admitted to hospital. A person is likely to be eligible for CHC funding if they have a complex health condition that requires the intervention of a health professional. A person who is eligible for CHC will have all of their care needs met by the NHS. Delays in securing timely assessments is a contributory factor in delaying discharge and in freeing up step-down provision provided to facilitate discharge.

There needed to be an agreed policy and procedure that clarified the roles and responsibilities of all agencies involved in the discharge process.

There needed to be clear information for patients about what to expect so that health and social care staff give a consistent message to enable patients, their Carers and families to make informed choices. This would also help to address unrealistic expectations and could help to prevent difficulties later over choices that may or may not be available.

The alignment of consultant decisions with availability of medication and transport home was not consistently occurring across wards at Hillingdon Hospital. This was preventing some more timely discharges from hospital occurring.

One significant cause of delays in Hillingdon was an increasing reluctance on the part of care homes to accept people with more complex needs, particularly people with challenging behaviours. A contributing factor to this was the difficulties faced by care home providers, especially nursing homes, in securing and retaining suitably qualified staff.

From Healthwatch Hillingdon's Hospital Discharge Project and from the evidence submitted during the review, it is evident that communication is the key to the process of discharge.

Patient and carers need to be kept fully informed across the whole pathway to entering and exiting hospital. The communication has to be clear, easy to understand and given upon entry to

hospital. Patients are often unable to speak to a doctor, or due to their condition, have forgotten or become confused about what they have been told. This is vital, in particular with regard to medication which has been prescribed to patients when they leave hospital.

In addition good communication is needed on how to arrange a private care home placement, or care package. Evidence would suggest that by providing clear written information to inform patient/carers and support them to make decision and would greatly improve the discharge process.

Joint working is essential for the effective management of discharge from hospital. In some cases, decisions on the best care for an individual following discharge from hospital are based on a professional assessment of the patient's health, social care and housing needs. It is therefore important that the input from these professionals is coordinated effectively and promptly. Protocols and processes need to be joined up, consistent, sending the same message to patients, to ensure that clear information is given to patients.

Recognition was made of the requirement for a single point of access for discharge which would improve the communication to the patient / carer. The Committee was reassured that this was already being put in place across North West London and would greatly improve the process of discharge. It was acknowledged that joint and closer working would improve the process and maximise the use of resources and avoid duplication. Members acknowledged that hospitals were very busy places and health professionals had heavy and involved workloads, but the suggested improvements would ultimately improve the discharge experience for patients.

The Committee therefore recommend:

1	<p>a) That clear information about the discharge process is developed for, and with people admitted to hospital and their families, so that they know what to expect.</p> <p>b) That this information is provided to patients on admission, as agreed through a joint working policy.</p>
2	<p>a) That a joint working policy across all partners involved in the hospital discharge process is developed to clarify the roles and responsibilities of the appropriate teams within each organisation and to ensure consistency of approach.</p> <p>b) That briefings with staff across organisations on the content of the agreed joint working policy are undertaken.</p>

The Committee heard that that there is a large range of services delivered by different health

providers. This arrangement led to multiple transferring responsibility for care between organisations which sometimes meant that the needs of residents were not necessarily being addressed by the most appropriate professional first time.

Timely communication between organisations is needed, to enable a better integrated intermediate care service. Organisations who were providing care for an individual needed to be connected and there needed to be a joint way of keeping patients and their carers updated, informed and involved.

On that basis, the recommendation is:

3

That partners explore options for delivering a more integrated intermediate care service that ensures that people admitted to hospital are supported to go home by the most appropriate professional first time and that the number of hand-offs between different organisations is reduced.

The Committee heard from witnesses that once a person has been admitted to a care home they become institutionalised very quickly, which can result in a loss of independence and a shorter life span. In addition, family dynamics can also make it difficult to move a person into a less restrictive setting because of the view that their relative is safer in a care home. The conclusion was that the best option was to avoid a person being admitted into a care home at all if it could be avoided. On this basis, the recommendation is:

4

That partners explore affordable options to enable people who are medically fit for discharge are able to step down from hospital without the need to be admitted to a care home.

The Committee was provided with demographic information for the Borough which indicated that there were an increasing number of older people living in the Borough. With people living longer the incidences of people with dementia was on the increase, which was impacting on social and health care. This was likely to increase with Projecting Older People Population Information projections suggesting that the number of people with dementia was likely to increase by 14% to 3,133 between 2015 and 2020 and by 25% to 3,606 in the period between 2020 and 2025. This would be a challenge for the provision of health and social care services.

This changing demographics of the population of the Borough, and some of the complex care needs of patients, was a factor in the hospital discharge process.

Information was provided which summarised the profile of Hillingdon's current care home market

for older people.¹ The key headlines were:

- a) As at 30 September 2016, Hillingdon had 49 care homes comprising of 1,482 beds.
- b) There were 31 homes comprising of 1,353 beds for older people.
- c) There were 16 nursing homes in Hillingdon comprising of 749 beds.
- d) There were 18 care homes for younger adults comprising of 129 beds.
- e) 45% of older people placements were of self-funders, which compared to an average of 30% for London.
- f) Providers owning more than 40 homes nationally owned approximately 40% of the older people care home market in Hillingdon; 40% was also owned by providers owning between 2% and 5% of the older people market nationally.
- g) 55% (27) of Hillingdon's care homes were in the south of the Borough, e.g. below the A40, but 52% (773 beds) of bed capacity is in the north of the Borough.

With the changing demographics of the population of the Borough it was important that there was an adequate supply of home places for those elderly people leaving hospital. All partners were asked to investigate all affordable options to ensure there were an adequate supply of care home places to meet the likely increased demand in the future. The Committee therefore recommend:

5

That partners explore affordable options that will ensure an appropriate supply of care home places to address the needs arising from Hillingdon's changing population.

An advocacy service is provided by an advocate who is independent of social services and the NHS, and who isn't part of the patient's family. An advocate's role includes arguing the case of the patient, and making sure the correct procedures are followed by health and social care services.

In the case of elderly vulnerable people, this is an important role, particularly during the stressful situation of being discharged from hospital. Being independent means they are there to represent the wishes of the patient without giving their personal opinion and without representing the views of the NHS or the local authority.

Local authorities fund advocacy services and the Committee agreed that partners should enable access to advocacy for the elderly admitted to hospital to help support them in making decisions in relation to their future care needs, after discharge from hospital.

¹ Based on report by Care Analytics Ltd for the Council in December 2015.

The Committee recommend:

6	<p>That partners explore affordable options for ensuring that people admitted to hospital and their families have access to advocacy to support them in making informed decisions about how their future care needs will be met, including the care setting.</p>
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The Committee noted all of the work that was in progress and considered that it would be helpful if Healthwatch could revisit their review, as this would help to identify the extent to which the patient experience of the discharge process had improved. As a result, the following recommendation is made:

7	<p>That Healthwatch Hillingdon consider undertaking a further review of the patient experience of the discharge process at Hillingdon Hospital in a year's time.</p>
8	<p>That a progress report be provided to the Social Services, Housing & Public Health Policy Overview Committee six months after the implementation of the review's recommendations, that includes an update on the above recommendations as well as:</p> <ul style="list-style-type: none"> ● Number/% of Delayed Transfers Of Care in Hillingdon Hospital attributed to patient/family choice; ● % of Continuing Healthcare assessments taking place in a hospital setting; ● Number/% of patients discharged before midday 7 days a week.

Terms of Reference of the review

The following Terms of Reference were agreed by the Committee from the outset of the review:

1. To gain a comprehensive understanding of current discharge activity in respect of the 65 and over population and focusing on Hillingdon Hospital.
2. To investigate best practice on what the ideal discharge pathway would look like.
3. To gather evidence from Healthwatch Hillingdon about the resident/patient experience of hospital discharge.
4. To explore the key issues and challenges that inhibits a smooth hospital discharge process and pathway.
5. To particularly examine the issues faced in meeting the needs of residents/patients with mental health needs and the impact on the broader discharge process.
6. To consider national and regional initiatives, e.g. London and North West London, being undertaken to improve the hospital discharge process and pathway.
7. To examine the work being undertaken by the Council and NHS and third sector partners to improve the resident/patient experience of hospital discharge.
8. To report to Cabinet any positive recommendations or conclusions arising from the review.

Witnesses and Committee activity

The Committee received evidence from the following sources and witnesses:

<p>Witness Session 4 October 2016</p>	<ul style="list-style-type: none"> ● Gary Collier (Health & Social Care Integration Manager) ● Nina Durnford (Head of Social Work, Adult Social Care Services) ● Dr Steve Hajioff (Director of Public Health)
<p>Witness Session 2 November 2016</p>	<ul style="list-style-type: none"> ● Gary Collier (Health & Social Care Integration Manager) ● Nigel Dicker (Deputy Director Residents Services) ● Nina Durnford (Head of Social Work, Adult Social Care Services) ● Sandra Taylor (Head of Service - Early Intervention & Prevention) ● Caroline Morison (Chief Operating Officer, Hillingdon Clinical Commissioning Group) ● David Muann (Clinical Team Leader for the Continuing Healthcare Team)
<p>Witness Session 14 December 2016</p>	<ul style="list-style-type: none"> ● Kim Cox (Borough Director, Central North West London NHS Foundation Trust) ● Claire Eves (Head of Adult Services, Central North West London NHS Foundation Trust) ● Graham Hawkes (Chief Executive Officer, Healthwatch Hillingdon) ● Melissa Mellett (Director of Operational Performance, Hillingdon Hospital) ● Caroline Morison (Chief Operating Officer, Hillingdon Clinical Commissioning Group) ● Vanessa Saunders (Deputy Director of Nursing, Hillingdon Hospital) ● Julie Vowles (Consultant Geriatrician, Hillingdon Hospital) ● Julie Wright (Director of Integrated Care, Hillingdon Hospital).

REVIEW BY THE CHILDREN, YOUNG PEOPLE & LEARNING POLICY OVERVIEW COMMITTEE: *SUPPORTING CHILDREN WITH SPECIAL EDUCATION NEEDS AND DISABILITIES (SEND) IN THEIR EARLY YEARS*

Cabinet Member	Councillor David Simmonds CBE
Cabinet Portfolio	Deputy Leader of the Council Education and Children's Services
Officer Contact(s)	Anisha Teji, Chief Executive's Office
Papers with report	Children, Young People and Learning Policy Overview Committee's review of 'Supporting Children with Special Education Needs and Disabilities In Their Early Years'

HEADLINES

Summary	To receive the Children, Young People and Learning Policy Overview Committee's review into Supporting Children with Special Needs and Disabilities (SEND) In Their Early Years. To give consideration to the recommendations of the review.
Putting our Residents First	This report supports the following Council objective of: <i>Our People</i> .
Financial Cost	The recommendations proposed as a result of this review do not in themselves have a financial impact.
Relevant Policy Overview Committee	Children, Young People and Learning Policy Overview Committee
Relevant Ward(s)	All

RECOMMENDATIONS

That Cabinet:

- A. Welcomes the Committee's findings from their review into Supporting Children with Special Education Needs and Disabilities (SEND) In Their Early Years.**

B. Supports the following recommendations from the Committee for implementation by officers, in consultation with the Cabinet Member for Education and Children's Services:

- 1) That Cabinet welcome good collaboration between the Council and partners to work together in support of children with SEND.**
- 2) Identification, Intervention and Transition:**
 - a. That Cabinet notes the findings of the Children, Young People and Learning Policy Overview Committee that shows the importance of transition from the early years provision to the next stage.**
 - b. That officers continue to review the effectiveness of the tools used to support early identification.**
 - c. That officers monitor the effectiveness and timeliness of interventions; enabling families to have timely access to high quality interventions whilst ensuring best value for money.**
- 3) That officers further develop and promote communication channels such as the local offer; with a view to ensure that parents are well informed and aware of the opportunities available to them.**
- 4) That the outcomes and work of children's services in relation to SEND are monitored by officers, the Cabinet Member and Policy Overview Committee.**

Reasons for recommendation

To consider the report of the Children, Young People and Learning Policy Overview Committee into Supporting Children with Special Education Needs and Disabilities in their Early Years.

Alternative options considered / risk management

The Cabinet could decide to reject some or all of the Committee's recommendations, or pursue alternative routes in which to progress the objectives of the review.

SUPPORTING INFORMATION

Every child deserves the best possible start in life and support that enables them to fulfil their potential. In light of significant national changes to legislation in recent years, Members of the Children's Young People & Learning Policy Overview Committee decided to review what support and processes the London Borough of Hillingdon had in place to support children in their very early years with Special Educational Needs and Disabilities (SEND).

The Terms of Reference of the review were as follows:

- I. To understand how children 0 - 5 with SEND have their needs identified early with particular regard to vulnerable children;
- II. Understand how early years providers and support services work together to improve outcomes for children with SEND;
- III. Use qualitative and quantitative data to better understand the impact of support and interventions for children with SEND;
- IV. Understand the role specialist services play in meeting the needs of children with SEND in early years settings;
- V. Understand how parents with children with SEND are supported;
- VI. Understand how SEND support in the early years is funded; and
- VII. To understand how continuity and learning for children 0-5 with SEND are supported during periods of transition.

Members considered the importance of how SEND was **identified** in early years, the methods of **intervention** available and how statutory bodies and the Council support the **transitions**, e.g. to nursery or school, in different settings.

The Committee undertook a range of witness sessions with a variety of internal and external representatives, including the Cabinet Member for Education and Children's Services. As part of the evidence gathering, Members also met with parents of children with SEND and they were given an opportunity to provide their perspective of the support available to them. Members appreciated how insightful these witness sessions were to assist them in their review.

The Committee has made four recommendations which it is hoped will recognise the positive work already being undertaken by the Council and partners and also identify areas that can be strengthened further to ensure that children with SEND continue to be supported in.

Officer comments on Recommendations

Whilst the attached report from the Committee sets out the review in more detail, officers advise Cabinet that the Committee has made some positive recommendations to take forward.

If Cabinet agrees the recommendations, these will be incorporated within the revised SEND strategy 2017 - 2020 and its annually updated action plan. These areas will continue to be a priority and work stream within the strategy. It is proposed that an update is provided to the Cabinet Member along with the Children, Young People and Learning Policy Overview committee in 2018/19 detailing the effectiveness of the strategy's implementation.

Financial Implications

The recommendations proposed as a result of this review do not in themselves have a financial impact.

RESIDENT BENEFIT & CONSULTATION

The benefit or impact upon Hillingdon residents, service users and communities?

The recommendations will support the Council's efforts to make sure every child with SEND in Hillingdon had access to the best start in life, are supported to integrate well within society, interact with other children and develop the skills required for their age.

Consultation carried out or required

The Committee sought a wide range of external witness testimony as set out in its report.

CORPORATE CONSIDERATIONS

Corporate Finance

Corporate Finance has reviewed the report and concur with the financial implications set out above.

Legal

There are no legal issues arising out of the recommendations in this report.

BACKGROUND PAPERS

NIL.

Supporting Children with Special Education Needs and Disabilities (SEND) In Their Early Years



A review by the Children, Young People and Learning Policy Overview Committee

Councillors on the Committee: Jane Palmer (Chairman), Nicky Denys (Vice Chairman), Dominic Gilham, Becky Haggar, Allan Kauffman, John Oswell, Jan Sweeting, Judith Cooper and Kanwal Dheer. Anthony Little (Roman Catholic Diocesan).

2017/18



HILLINGDON
LONDON

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Chairman's Foreword

‘Supporting Children with Special Education Needs and Disabilities (SEND) In Their Early Years’



On behalf of the Children, Young People and Learning Policy Overview Committee, I am pleased to present this report detailing the identification, intervention and transition processes in place for children with SEND in their early years.

Statistics from the Department for Education (DfE) in 2015 showed that there were more than 1.3 million children in England identified as having special educational needs. Every child is unique and has their own characteristics, personality, strengths and weaknesses. In fact, children from all backgrounds, family settings, cultures and ethnicities may have special needs. There is, however, a clear goal of ensuring that all children are given access to the same opportunities to integrate and transition to society comfortably.

It is not important how SEND develops in this review, but how it is identified, the methods of intervention available and how statutory bodies and the Council support the transitions in different settings. The purpose of this review was to consider how children with SEND had their needs identified and to understand and explore the current interventions in place to address these needs. This was notwithstanding the significant work already undertaken by the London Borough of Hillingdon and other partners to engage with parents and children with SEND.

The findings by the Committee acknowledge and recognise the work undertaken by the Council

to support its residents. The review identifies an area which can be improved to strengthen the position for parents of children with SEND, including improving the area of communication.

Finally, I would like to offer sincere thanks to all the witnesses who helped the Committee to gather evidence, either by attending a Committee meeting or by attending the witness sessions that took place at children's centres.

Their contributions to the Committee have been valuable and have enabled the Committee to undertake a full and thorough review of this topic.

Councillor Jane Palmer

Chairman of the Children, Young People & Learning Policy Overview Committee

Summary of findings & recommendations to Cabinet

Through the witnesses and evidence received during the detailed review by the Committee, Members have agreed the following recommendations to Cabinet:

<p>1</p>	<p>That Cabinet welcome the good collaboration between the Council and partners to work together in support of children with SEND.</p>
<p>2</p>	<p>Identification, Intervention and Transitions:</p> <ul style="list-style-type: none"> a. That Cabinet notes the findings of the Children, Young People and Learning Policy Overview Committee that shows the importance of transition from the early years provision to the next stage. b. That officers continue to review the effectiveness of the tools used to support early identification. c. That officers monitor the effectiveness and timeliness of interventions; enabling families to have timely access to high quality interventions whilst ensuring best value for money.
<p>3</p>	<p>That officers further develop and promote communication channels such as the local offer; with a view to ensure that parents are well informed and aware of the opportunities available to them.</p>
<p>4</p>	<p>That the outcomes and work of children's services in relation to SEND are monitored by officers, the Cabinet Member and Policy Overview Committee.</p>

Background to the review

The Committee was provided with a background to the review, which included information on the definition of SEND, current support offered and legislation in this area.

Definition of SEND

The Committee was informed that SEND was short for “special education needs or disabilities”. It covered a wide range of conditions which generally meant that a child required extra support in their learning. The conditions varied in degree and nature, and included: conditions impacting thinking and understanding, physical or sensory difficulties and difficulties with speech and language along with other areas that can affect a child's behaviour or ability to socialise, reading and writing and concentration levels.

Current support to children with SEND

It was noted that the London Borough of Hillingdon had high ambitions for children and young people including those with special educational needs and disabilities (SEND). There was a long history of developing inclusive early years provision for children with SEND within the Borough.

The range of early years provision in Hillingdon comprised three early years settings, 81 private, voluntary, independent settings (private, voluntary and independent settings include full day-care nurseries, playgroups or sessional care & nurseries within independent schools). This provision included;

- full day care
- sessional care
- early years centres and childminders.

The Committee was informed that there were currently 305 registered childminders in Hillingdon.

An inclusive early years setting would adapt to enable a child with SEND to fully participate and access play and learning opportunities with their peers. Training and support was provided to enable settings to meet their legislative requirements and develop quality inclusive services.

The Committee welcomed the Children and Families Act 2014 and the associated guidance that required local authorities to *'ensure that there is sufficient expertise and experience amongst local early years providers to support children with SEN' recognising that 'a pupil has Special Educational Needs where their learning difficulty or disability calls for special educational provision, that is provision different from or additional to that normally available to pupils of the same age.'*

Private, voluntary and independent settings within the London Borough of Hillingdon were

supported by the Council's Inclusion Team in developing quality inclusive provision; this team fulfilled the role of the area Special Education Needs Coordinator (SENCo) and provided training and support to settings to enable them to include children with a range of additional needs and disabilities. These settings along with nurseries and reception classes in maintained schools all delivered the Early Years Foundation Stage (EYFS), the statutory framework for children aged 0 - 5 years.

Health visitors were highly trained specialist community public health nurses who played an important role in the identification of children who may have SEND and the provision of support for these families. They implemented the healthy child programme, a national government initiative with the aim of *'improving the health and wellbeing of children, as part of an integrated approach to supporting children and families.'*

Community Paediatricians saw patients aged 0 - school leaving age, who were resident in Hillingdon (with the exception of Hillingdon residents registered with an Ealing GP), and who had one or more of the following conditions: development delay or long term conditions, disabilities and complex health needs, epilepsy, cerebral palsy, chromosomal disorders, neuromuscular conditions, children with neurodevelopment concerns such as social and communication difficulties, autism spectrum disorder, developmental coordination disorder and babies who were identified as medically high risk at birth.

The Council's Sensory Intervention Team provided support to families of children, whose needs were identified soon after birth, for example following the hearing screening test. The Committee was informed that children and young people with sensory needs could require very specialist support at different points in their lives. Evidence showed that early intervention could make a significant difference to their progression.

All of these services worked in collaboration to support the process of identification and subsequent interventions to support early learning for children with SEND.

Legislative Context

The Committee was provided with information on the legislative context of SEND.

The Children and Families Act was given Royal Assent in March 2014 and brought about the most significant reforms to the statutory framework for Special Education Needs and Disabilities (SEND) for 30 years. These changes to the law implemented a new system seeking to help children and young people aged 0 to 25 with SEND. More specifically, the changes aimed to provide a system that is:

- Person centred;
- Outcome focused;
- Delivered through a co-ordinated and integrated model of support; and
- Inclusive of families in planning and decision making.

Under the Children and Families Act 2014, SEND children with complex needs were being transitioned to education, health and care plans (EHCPs), which operated until they were 25

years old. The aim of EHCPs was to put more emphasis on personal goals and to describe the support a young person would receive while they were in education or training.

The Children and Families Act 2014 sought to improve life chances for those with SEND encouraging those working with children and young people with SEND to consider outcomes such as gaining employment, living as independently as possible, being part of the community, having friends and good health from the early years.

Reforms were made in an attempt to simplify the system and it was thought that the reforms would put children and parents at the heart of the system. Following the passing of the Act, the reforms were implemented gradually and came fully into force on 1 September 2014. In Hillingdon, the Council has embraced the reform agenda by working with partners to develop its approach and practice in accordance with the legislative changes and the Special Education Needs and Disabilities Code of Practice which provides statutory guidance for organisations working with children and young people with SEND.

The legislation required services in the 'local area' to work together to identify, intervene and improve outcomes for children and young people with SEND.

Reasons for the review

Members of the Committee recognised that children grow and develop more in their first five years than at any other point in their development. It was also widely understood that effective early intervention could lead to improved outcomes for all children including those with SEND.

The Committee wholly endorsed the Department for Education's notion that:

'Every child deserves the best possible start in life and the support that enables them to fulfil their potential. Children develop quickly in the early years and a child's experiences between birth and age five have a major impact on their future life chances. A secure, safe and happy childhood is important in its own right. Good parenting and high quality early learning together provide the foundation children need to make the most of their abilities and talents as they grow up. (Statutory framework for the Early Years Foundation Stage (EYFS) DfE, 2012.)

The Committee wished to make sure every child with SEND in Hillingdon had access to the best start in life. To that end, it was proposed that the review considered the effectiveness of the early identification, interventions and subsequent transitions into the maintained sector (schools) for children 0 - 5 years old with SEND. In particular, Members wished to examine the Council's implementation of the SEND Code of Practice and the EYFS statutory framework.

By looking at the measures undertaken by the Council and calling on an array of witnesses including parents, Members considered they would also be in a good position to review how young children with SEND are supported to integrate well within society, interact with other children and develop the skills required for their age.

Evidence and witness testimony

Evidence gathering

In order to explore the Council's current position in relation to supporting children with SEND in the early years provision, the Committee undertook a series of three witness sessions and reports were produced for these sessions. These sessions received evidence presented by a number of Council officers and witnesses (parents, children and other education and health care practitioners). These witnesses provided a first hand perspective from their experiences on the front line. They set out the current situation, arrangements in place, views on the support provided and areas that might be improved.

A full breakdown of witnesses who provided evidence to the Committee can be found at the end of the report, alongside the review's Terms of Reference. The Committee was extremely grateful to those who gave their time to present at the witness sessions and, without exception, the Committee was both encouraged by and in admiration of the outstanding work that was being done across the Borough to meet the needs of this group of residents.

The Committee heard evidence on the following three areas:

KEY STAGES

identification

how children are identified by healthcare practitioners...

interventions

what interventions processes are in place...

transition

how are transitions supported to the next stage...

Identification

As mentioned earlier, every child is unique and they develop and progress at their own pace. Early identification is key in supporting the child and ensuring that they have access to the relevant services. The Committee heard evidence that the Early Years Foundation Stage (EYFS) required all those who work with young children to be alert to emerging difficulties and to respond early. This included concerns raised by parents and children. All early years providers are required to have arrangements in place to identify children with SEN or disabilities (which includes childminders).

The Committee was told that if a health body was of the opinion that a young child had, or probably had, SEND they must inform the child's parents and bring the child to the attention of the local authority. Locally the early notifications from health were received by the Early Support Team, who contact the family and, where appropriate, offered Early Support key working or portage home visiting support.

<p>0 -2 age range</p>	<p>The Committee was informed that children with more complex developmental or sensory needs may be identified at birth. Parents may raise concerns about their child's development with their child's health visitor, GP, child's nursery or at a Children's Centre. Health bodies working with the family should support them in accessing relevant support and assistance.</p>
<p>2 year olds</p>	<p>National Government had introduced two development checks when children are between the ages of two and three to support the early identification and intervention for children who may have emerging concerns or an identified SEN or disability.</p> <p>For children attending a setting (PVI setting or childminder), early years practitioners must review progress and provide parents with a short written summary of their child's development when a child is aged between two and three. This summary should focus on communication and language, physical and personal, social and emotional development. Where there are significant emerging concerns, practitioners are required to develop a co-ordinated plan to support the child.</p> <p>Health visitors carried out a further screening as part of the Healthy</p>

	<p>Child Programme; in Hillingdon they used a tool called the Ages and Stages Questionnaire (ASQ and where appropriate the social emotional ASQ) to structure these checks.</p> <p>The 'Progress check at age two' and the 'Healthy Child Programme two-year review' together formed the integrated review.</p>
<p>3 - 5 age range</p>	<p>It was explained to the Committee that 89% of three and four year olds in Hillingdon attended some form of early years' provision. The EYFS framework set standards that all Ofsted registered providers must meet. This included ongoing assessment of children's progress. As well as the more formal checks, early years' practitioners working with children should monitor and review the development and progress of all children during the early years.</p> <p>During this period, health visitors provided a range of services which include the handover of all families from Health Visitor to School Nurse and information sharing to inform the school entry assessment.</p>

The Committee heard evidence from the Head of Children's Services and Operations in Hillingdon at Central and North West London NHS Foundation Trust. The Committee was informed that the health visiting service comprised of a number of teams including health visitors, community staff nurses, nursery nurses and administrative. This service was provided to children aged 0-5 and staff worked closely with children's centres, social and other healthcare professionals to make early identification.

The Committee was told that health visitors provided the mandated reviews as prescribed in national policy (Healthy Child Programme). These start during the prenatal period with the first review being offered on or after twenty eight weeks of pregnancy followed by a new birth visit within 14 days. Some of the services offered also included antenatal contact between 28 - 32 weeks of pregnancy assessing family needs, home visits 10 - 14 days after birth, health reviews for children between eight months to a year and child health drop ins. Later, a 6 - 8 week review is offered for the mother, father and child which includes a maternal mood assessment, assessment of progress in maternal mental health and ongoing support with breastfeeding. The one year review assesses physical, emotional and developmental needs within the family context; supporting parenting with information about attachment development, monitoring growth, health promotion, accident prevention, healthy eating and oral health, along with

immunisation recommendations.

Speech and language therapists provided community based assessment opportunities - 'Small Talk' sessions which children and families can be referred to. At these sessions, the speech and language therapist will advise the family if the child requires a referral to speech and language therapy. They will also signpost them to other groups such as Language for Life or Attention Hillingdon.

It was reported by the Council's Inclusion Team Manager, Disability Services that the Council supports families and children. The services provided by the Council fell into two broad categories that focused on different areas. The first category, training, support, information, advice and guidance services, provided specialist training to teachers and early years practitioners on tools that would enable detailed assessments or observation directly informing the identification of skills, abilities or special education needs and disabilities (SEND). The second category links with other services involved working with advice and guidance for referral routes, Children's Centre staff, early years practitioners, SEND Team and CAMHS. The third category involved shared pathways.

The Committee heard from an Advanced Practitioner (provides training and support to other nurseries) / early years practitioner - South Ruislip Early Years Centre. It was explained that there were a number of tools to support the early identification of children's needs, which included a tool called WELLCOMM (speech and language tool resource kit) which contained specific activities linked to each stage of development. There was a speech language and communication folder which provided tip sheets for parents and advice for staff- this information was shared with schools, children's centres, GPs and health visitors. Another identification method used was the two year progress checks (requirement of the EYFS) in which health visitors carry out the healthy children programme screening between the ages of 24 and 30 months.

Some of the areas that worked well included training staff at the early years stages. The types of training received included ELKLAN speech and language support, promoting positive behaviours training, training in making learning visible and five to thrive. It was emphasised that building relationships with parents led to better relations long term.

The Committee also had regard to the evidence from a doctor in a child development centre that worked closely with children with SEND. The doctor worked as part of a local paediatric community service offering support to children with additional needs by providing multidisciplinary assessments and interventions. Children were assessed by relevant professionals before being allocated to a care pathway to maximise their developmental, social, emotional and educational potential. The doctor explained that the Child Development Centre

offered child and family centred holistic care. He gave details about identification, intervention and transition methods. In relation to identification the doctor advised that the types of intervention methods offered by the child development centre included:

- Antenatal - providing advice for families to have antenatal assessments if they had another child with a condition that could be diagnosed antenatal, for example, Down Syndrome.
- At birth - maternity staff identifying concerns at an early stage.
- Clinic attendance - children attending child development centre clinics for medical assessments as part of statutory assessments and other developmental conditions were identified.

Intervention

'Where a setting identifies a child as having SEN they must work in partnership with parents to establish the support the child needs.' (DfE 2015)

The Committee bore in mind that research has shown that early intervention improves outcomes for children. In the Committee's view, it was therefore particularly important to provide timely special educational provision. Early action to address identified needs was crucial to ensuring progress and improving outcomes, thus linking each stage.

Locally, there was a history of health practitioners and the local authority working together to improve outcomes for children with SEND. There have been a number of initiatives which have led to better coordinated services for young children and their families in the London Borough of Hillingdon. These included:

- Pathways for children with social communication difficulties. Shared pathways had been developed and interventions were being delivered by speech and language therapy.
- A Speech and Language pack was co-produced by health and the local authority and provided to PVI settings, schools, GPs and children's centres. This supported communication, shared good practice and provided resources and a structure for sharing key messages about ways to promote children's communication with families, settings and schools.
- 'Language for life' sessions were held in children's centres for families of children who were showing signs of, or at risk of, language delay. The sessions focused on skilling up parents and carers to support their child's communication development.

The recent CQC/Ofsted local area inspection letter commended this and other forms of early intervention within the Borough; 'Parents and carers of young children under five value the high-quality support they receive from professionals. The portage service and speech and

language therapy service are particularly well thought of. The 'Attention Hillingdon' programme, which has been rolled out in around 80 early years establishments, has been very successful in improving outcomes. This programme involves activities designed to improve children's focus and attention skills. Leaders check that the programme is delivered effectively, and grade providers to reflect the improvements made.'

Interventions in nurseries and schools

The Committee heard from a Specialist Resource Provision/Assistant Head Teacher at Hayes Park School and an Early Years Foundation Manager. The ability to refer to speech and language therapy services, seek advice and support from the Local Authority Inclusion team and the Early Years Team, links with Charville children's centres and improved guidance for emergency funding and exceptional funding, including early access funding were areas that worked well in Hayes Park School. These were all forms of external support offered to the school.

The Committee was informed that the following processes worked particularly well in that school:

- internal "raising the concern" processes
- in-class strategy support plans
- early identification through language link
- screening in reception for all children
- speech screening
- information sharing on the Behaviour Watch system

There were clear processes in place, such as the ability to be able to identify children with SEND and evidence gathering at an early stage. Witnesses explained that the SENCo at the school had devised a plan explicitly stating what was needed and how the action should be undertaken by teachers. There were also SEND drop in sessions which were useful for staff and parents.

Another area that worked well was Nurture Groups, which were classes of between six and 12 children or young people in early years. There were six principles of Nurture and as the children learnt academically and socially they developed confidence, became responsive to others, learnt self respect and took pride in behaving well and in achieving. Parental engagement was also key to success with morning coffee sessions being offered, support groups, parent reading classes and planners being used to communicate and create a home school link.

Areas of potential recommendations included: the ability to be able to make direct referrals to Occupational Health (as it can only be done by the GP), increased links between EYFS settings and health visitors for hard to reach parents, specific support for independent nursery settings to

begin the education health care applications process before the child started school, increased guidance and support for parents in regards to self care and mechanisms for engaging parents better through online forums.

The witnesses also confirmed that the main barriers for families taking summer school offers were language barriers. There was also a need to develop a good relationship of trust and sharing information as parental engagement was significant. The significance of communication was key in this process and this was strongly emphasised to the Committee. The clear pathway for funding had made it easier and costs were managed through prioritisation. An inclusion network was being developed to share good practice amongst schools.

The Committee also heard from a Nursery Manager from a private voluntary school. The systems in place at 4street Nursery for interventions for young children with SEND were described to the Committee and these areas included: Attention Hillingdon, Playing and Learning to Socialise (PALS) Social Skills Programme, WELLCOMM, High quality nursery provision and Five to Thrive. It was confirmed to the Committee that the nursery received a huge amount of support from the Council's Inclusion Team.

Areas that worked well were children being identified early with appropriate interventions put in place, relationships being built with parents from an early stage, providing timely and relevant information to the parents, tracking the progress against the EYFS with individual development plans and close working with other professionals.

Early planning for transitions was important to ensure that the best strategies were put in place for later stages, face to face meetings built and maintained relations between parents and professionals.

There was an emphasis placed on children that fell below the radar because of lack of parental engagement. There was always a worry of financial pressures, particularly with some of the new initiatives being introduced.

Interventions provided by health practitioners

In relation to intervention methods at child development centres, the expert doctor witness explained that interventions were provided by child development centre therapy services.

Transitions

The Committee was informed that effective transitions for children support their well being and enable continuity of learning. A transition in the early years can happen for many reasons, this can cause many changes for the child. Transition may be when the child first begins a setting, moves rooms throughout a setting as they become older, leaving a preschool to begin school and finally leaving the EYFS to begin year one. These transitions need to be managed sensitively for all children including children with SEND. Depending on when a child begins an early years setting and the size of the setting, these transitions may happen more or less frequently.

Child development centre therapists visited nurseries and schools to observe children and provide appropriate support to education staff. Some Members of the Committee met with parents that had children with SEND. A key theme raised from the meetings was better communication about the services which were offered to them and between key health workers. Communications between services and parents was also indicated as a significant area by the Cabinet Member for Education and Children's Services, who attended as a witness.

It was confirmed to the Committee that settings should have policies and procedures in place to support all practitioners in preparing children and parents for a transition in the early years. This may involve various pieces of paperwork such as sending over learning journals, development tracking sheets, and current 'all about me' forms. Many early years settings offer trial sessions where a child can stay and play in the new environment and begin building relationships with their new key person. A SEND transition may be more complex due to the number of people involved in the child's care and the additional needs they have. It is good practice to arrange a meeting involving the parents, previous key person and new key person to discuss any additional needs. The meeting should share the changes that will happen such as to the routine, the support that is already in place, what support needs to continue and the expectations or concerns that anyone has. This is a great way of information sharing and ensures that the child's transition is as smooth as possible.

Findings & Conclusions

After considering the evidence heard, the Committee discussed recommendations on whether there were areas that could be improved to better support children with SEND. Appreciating the significant work already undertaken, the Committee was satisfied that there was already a good amount of work being undertaken by the Council, and therefore wanted to highlight this positive work. It also made recommendations on areas that could be strengthened.

Collaboration

Throughout the course of the review, the Committee heard evidence that many different practitioners, teams and health services were involved in the three stages of identification, intervention and transition. The Committee heard evidence regarding the positive work already being undertaken. This included work in relation to the identification processes at an early stage such as child development centres working with midwives to risk assess. Nurseries working with parents and SENco to devise proper learning plans for children. This was highlighted specifically with regard to the process for intervention in nurseries and schools and the close working with the Council's Inclusion team and early years team, and also the close working with children's centres. This assisted children and parents to seek support from relevant sources. The Committee commended this positive work and therefore suggested:

1

That Cabinet welcome the good collaboration between the Council and partners to work together in support of children with SEND.

Identification, Intervention and Transition

Throughout the course of the evidence, it was no doubt to the Committee that the steps taken in a child's early life impacted on later stages. It wholly endorsed the DoE's notion that:

'Delay at this stage can give rise to learning difficulties and subsequent loss of self esteem, frustration in learning and to behaviour difficulties. Early action to address identified needs is

critical to the future progress and improved outcomes that are essential in helping children prepare for adult life.' (DoE Sept 2014).

In the Committee's view, the early years stages in a child's life were a period of rapid change. For a child with SEND, the impacts of the change were increased and had more of an influential effect at a later stage. The Committee considered that it was therefore particularly important that any needs were identified early and the appropriate interventions put in place to enhance children's development.

It was recognised that high quality early education improves health and promotes development and learning. The Committee heard evidence that, in Hillingdon, the Inclusion Team worked with early years settings to develop high quality inclusive provision; providing specific guidance and support in meeting identified children's needs. This support included workforce development. The range of interventions available to support settings in meeting children's needs included:

- Playing and Learning to Socialise (PALS) Social Skills Programme
- Attention Hillingdon - a group designed to develop children's attention and listening skills with a focus on developing shared attention

All of these initiatives worked together to ensure that children with SEND had their needs identified from an early stage, the appropriate interventions were in place to support the child's transition to the next settings.

The Committee bore in mind that were already processes in place in schools, nurseries and health centres to ensure that children had access to the most relevant support and help. These processes ranged in variety from having in depth guidance for parents, shared information amongst health institutions and carrying out progress checks. Statistics put before the Committee also showed that key performance indicators were being met in relation to mothers receiving first face to face antenatal contact with health visitors, children receiving a 12 month review by the time they were 12 months and children receiving their 2-2.5 year review. Areas where key performance indicators were not being met included the total number of maternal mood reviews undertaken and learning visits undertaken.

The Committee concluded that the support to children with SEND provided by the Council was of good value, to a high standard and to be commended to Cabinet. However, there were still areas that could be improved to ensure that the current tools in place were effective in the changing climate and were providing the best value for money.

On that basis, it is recommended that:

2

Identification, Intervention and Transitions:

- a. That Cabinet notes the findings of the Children, Young People and Learning Policy Overview Committee that shows the importance of transition from the early years provision to the next stage.
- b. That officers continue to review the effectiveness of the tools used to support early identification.
- c. That officers monitor the effectiveness and timeliness of interventions; enabling families to have timely access to high quality interventions whilst ensuring best value for money.

Communication Channels

Although it is clear that Hillingdon has already made some good progress in identification, intervention and transition with children with SEND, from the evidence considered by the Committee, it was also clear that there was scope for improvement in relation to communication between parents and healthcare institutions.

The Committee recalled evidence it heard from witnesses that language barriers sometimes made it difficult to communicate about matters relating to SEND. Another potential difficulty was consistent communication amongst different healthcare professionals who were involved in a child's care. Witnesses explained to the Committee that parents were not always aware of the options that were available to them. For example, parents needed more information about areas such as the Local Offer.

In the Committee's view, communication with parents of SEND was crucial. It was important to create strong partnerships and relationships based on trust and confidence. Communication needed to be in depth detailing all aspects of a child's development, progress and concern. It is important for all parents and institutions to be working off the same page and this is where shared information comes into significant play. This is particularly important during the transition stage. The Committee bore in mind the evidence it heard from the parent witness session that they were also not always aware of the opportunities available and also not up to date about their child's health and needs. Based on the evidence of witnesses, some of the suggestions to improve communication may include a central resource accessible by all healthcare professionals that detail information in a central location. Alternatively, leaflets could be provided

to make parents aware of all the options available to them in terms of the Local Offer.

The Committee emphasised that effective and open communication was the key in achieving outcomes and happy children and families, particularly when managing transitions into different settings. This would also allow parents to develop confidence in services offered, sometimes when the topic of discussion were of a sensitive nature.

The Committee therefore recommended:

3

That officers explore other forms of communication channels with a view to ensure that parents are well informed and aware of the opportunities to them.

SEND outcomes

In common with other local authorities, the Council has implemented the changes introduced with the reforms in statutory legislation. It has worked closely with partners to ensure that children with SEND have appropriate identification, intervention and transition support, The Committee acknowledged that there is positive amount being undertaken and has identified an area for development, whilst remaining in its remit. For these reasons, it is suggested that the Committee, along with the Cabinet Member, monitors the outcomes and work of children's services in relation to SEND. This could involve a progress report later in 2018 and, if appropriate, further consideration as part of the Policy Overview Committee's future work programme.

4

That the outcomes and work of children's services in relation to SEND are monitored regularly by officers, the Cabinet Member and Policy Overview Committee.

Terms of Reference of the review

The following Terms of Reference were agreed by the Committee from the outset of the review:

Chapter 5 of the Code of Practice sets out the actions early years providers should take in relation to identifying and supporting children with special educational needs and disabilities. It is therefore proposed that the review uses this section of the code of practice as the terms of reference for the review process with particular reference to enabling committee members to gather and consider evidence in order to:

1. To understand how children 0 - 5 with SEND have their needs identified early with particular regard to vulnerable children;
2. Understand how early years providers and support services work together to improve outcomes for children with SEND;
3. Use qualitative and quantitative data to better understand the impact of support and interventions for children with SEND;
4. Understand the role specialist services play in meeting the needs of children with SEND in early years settings;
5. Understand of how parents with children with SEND are supported;
6. Understand how SEND support in the early years is funded; and
7. To understand how continuity and learning for children 0-5 with SEND are supported during periods of transition.

Witnesses and Committee activity

The Committee received evidence from the following sources and witnesses:

<p>Witness Session 1 - 27 September 2017</p>	<ul style="list-style-type: none"> ● Zoe Sargent (Head of Children’s Services, Central and North West London) (health - CCG) ● Tirzah Bagnulo, Inclusion Team Manager, Disabilities Service
<p>Witness Session 2 - 18 October 2017</p>	<ul style="list-style-type: none"> ● Councillor David Simmonds CBE - Deputy Leader and Cabinet Member for Education and Children's Services ● Dr Ahmed - Member of staff from the child development centre ● Elaine Caffery - Nursery Manager who also sits on the schools forum ● Jo Moody - Advanced Practitioner (provides training and support to other nurseries) / early years practitioner - South Ruislip Early Years Centre ● Janna Murphy - Specialist Resource Provision/Assistant Head Hayes Park School
<p>Witness Session 3 - 9 November 2017</p>	<ul style="list-style-type: none"> ● Some Members met with around five - six parents with children with SEND and obtained the child and family perspective.

References

Supporting SEND transitions through the Early Years (2015). Available at <http://www.earlyyearsprofessionals.com/eyc/latest-news/supporting-send-transitions-through-the-early-years/>

What is the provision for children with special needs? Available at <http://www.bbc.co.uk/news/education-36425292>

Children with special educational needs and disabilities (SEND). Available at: <https://www.gov.uk/children-with-special-educational-needs>

Communication with parents of SEND children is crucial. Available at: <http://www.earlyyearsprofessionals.com/eyc/send-support/communication-with-parents-send-children-crucial/>

Access and waiting times in children and young people's mental health services. Available at: https://epi.org.uk/wp-content/uploads/2017/09/EPI_Access-and-waiting-times_.pdf

People give up: the crisis in school support for children with special needs. Available at: <https://www.theguardian.com/education/2017/sep/05/crisis-in-support-for-sen-children-ehc-plans>

New special educational needs statistics show children in England still waiting for support. Available at: <http://www.autism.org.uk/get-involved/media-centre/news/2017-05-25-new-special-education-statistics.aspx>

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COUNCIL BUDGET - 2017/18 MONTH 9 REVENUE AND CAPITAL BUDGET MONITORING

Cabinet Member	Councillor Jonathan Bianco
Cabinet Portfolio	Finance, Property and Business Services
Report Author	Paul Whaymand, Corporate Director of Finance
Papers with report	Appendices A - F

HEADLINE INFORMATION

Purpose of report	<p>This report provides the Council's forecast financial position and performance against the 2017/18 revenue budget and Capital Programme.</p> <p>A net in-year underspend of £1,102k is projected against 2017/18 General Fund revenue budgets as of December 2017 (Month 9) representing an improvement of £52k from the position previously reported to Cabinet.</p> <p>The latest positions on other funds and the Capital Programme are detailed within the body of this report.</p>
Contribution to our plans and strategies	<p>Putting our Residents First: <i>Financial Management</i></p> <p>Achieving Value for Money is an important element of the Council's Medium Term Financial Plan.</p>
Financial Cost	N/A
Relevant Policy Overview Committee	Corporate Services and Partnerships
Ward(s) affected	All

RECOMMENDATIONS

That Cabinet:

1. Note the forecast budget position as at December 2017 (Month 9).
2. Note the Treasury Management update as at December 2017 at Appendix E.
3. Continue the delegated authority up until the March 2018 Cabinet meeting to the Chief Executive to approve any consultancy and agency assignments over £50k, with final sign-off of any assignments made by the Leader of the Council. Cabinet are also asked to note those consultancy and agency assignments over £50k approved under delegated authority between the 25 January 2018 and 15 February 2018 Cabinet meetings, detailed at Appendix F.

4. **Agree in principle a grant of £284k to provide funding for the rebuilding of the Guide Hut in Vernon Drive to be funded from the 2017/18 approved Youth Provision Capital Programme.**

INFORMATION

Reasons for Recommendations

1. The reason for **Recommendation 1** is to ensure that the Council achieves its budgetary objectives, providing Cabinet with an update on performance at Month 9 against budgets approved by Council on 23 February 2017. An update on the Council's Treasury Management activities is signposted in **Recommendation 2**.
2. **Recommendation 3** is intended to enable continued delegation of approval for appointment of consultancy and agency appointments over £50k to the Chief Executive, with final sign-off from the Leader of the Council. In addition, Appendix F reports back on use of this delegated authority previously granted by Cabinet.
3. **Recommendation 4** seeks authority to provide funding for the rebuilding of the Guide Hut in Vernon Drive from the 2017/18 approved Youth Provision Capital Programme where at this time, there are sufficient funds remaining to allocate towards this project. The District Guider and Treasurer of Harefield District Girl Guides contacted the Council in late 2017 to request assistance for works to bring the Guide Hut in Vernon Drive, Harefield up to an acceptable standard for the 90 plus girls using the premises each week. The Guide Hut is around 50 years old and following an assessment by Council officers it was concluded that it would be more cost effective to replace the building than fund the improvements which were being requested.

Alternative options considered

4. There are no other options proposed for consideration.

SUMMARY

REVENUE

5. An underspend of £1,102k is projected against General Fund revenue budgets at Month 9, with underspends against both Directorate and Corporate Operating Budgets continuing to be off-set by a pressure on Development and Risk Contingency. For all material pressures identified across the General Fund, a range of initiatives are in place to contain them both in-year and in future years.
6. In March 2017 the Government announced supplementary funding to the Improved Better Care Fund, frontloading resources previously anticipated to be available from 2018/19 and 2019/20 in order to support local authorities in stabilising the Social Care provider market. The Council's 2017/18 Budget included provision within inflation allocations of £4,903k for this very purpose, which was originally to be funded from a planned £5,000k drawdown from General Reserves. As funding of £4,054k is now available in year, the planned drawdown from reserves can therefore be reduced to £946k by this exceptional item.
7. Assuming the balance of General Contingency and Unallocated Priority Growth monies are released in-year, the £946k planned drawdown from General Balances is utilised and the anticipated surplus is realised, General Fund Balances are expected to total £38,894k at 31 March 2018, an increase of £156k from the opening 2017/18 balance.
8. As at Month 9, £12,046k of £15,508k savings are banked in full and £3,095k on track for delivery. The remaining £367k reported as 'amber' are ultimately expected to be delivered in full. £1,043k of savings have been promoted from 'amber' and 'green' to banked since Month 8, demonstrating continuing progress in the delivery of the 2017/18 savings programme.
9. With the exception of the Collection Fund, there are no material variances on other funds affecting the General Fund position. A surplus of £2,611k is reported within the Collection Fund relating to a favourable position on Council Tax, which is predominantly driven by the 2016/17 outturn surplus and is available to support the General Fund budget in 2018/19.
10. An in-year deficit of £1,933k is projected against the Schools Budget at Month 9, continuing the trend of the growing cost of funding placements for High Needs children. This will increase the cumulative deficit to £3,069k, which is expected to be funded from future Dedicated Schools Grant allocations and therefore not impact upon the General Fund position.

CAPITAL

11. The projected underspend against the General Fund Capital Programme for 2017/18 is £13,630k as at Month 9, predominantly as a result of re-phasing of project expenditure. The forecast outturn variance over the life of the programme to 2021/22 is an underspend of £658k. General Fund Capital Receipts of £17,020k are forecast for 2017/18, with a shortfall of £4,851k in total to 2021/22.
12. Prudential Borrowing required to support the 2017/18 to 2021/22 Capital Programme is forecast to be within budget by £4,826k. This is as a result of cost underspends of £658k and increases in grants and contributions of £12,420k, due mainly to the confirmed Basic Needs grant allocation for 2019/20 being substantially higher than original budget estimates. However this is partly offset by a forecast shortfall of £8,252k in Capital Receipts and Community Infrastructure Levy.

FURTHER INFORMATION

General Fund Revenue Budget

13. An underspend of £1,102k is reported across normal operating activities at Month 9, driven by underspends of £839k and £415k against Directorate and Corporate Operating Budgets, being off-set by an ongoing pressure across Development & Risk Contingency items of £152k.
14. A number of pressures and risk areas within this overall position continue to be closely monitored and are discussed in detail within the appendices to this report. The more material variances are highlighted in the summary of Directorate positions below.
15. The Improved Better Care Fund grant item is being treated as an Exceptional Item as the announcement of the increase in funding was made in March 2017, after the budget was set. This funding represents an increase in Social Care funding of £4,054k for 2017/18 to be used to stabilise the Adult Social Care placements market.
16. The Council's General Fund revenue budget contains £15,508k savings, with £15,141k either banked or on track for delivery at Month 9, an improvement of £393k from the previously reported position. The projected underspend on operating budgets reflects the status of these savings, which are ultimately expected to be banked in full with alternative measures in place to mitigate the financial impact of any slippage in implementation schedules.

Table 1: General Fund Overview

Original Budget £'000	Budget Changes £'000	Service	Month 9		Variance (As at Month 9) £'000	Variance (As at Month 8) £'000	Movement from Month 8 £'000
			Revised Budget £'000	Forecast Outturn £'000			
194,079	12,542	Directorate Operating Budgets	206,621	205,782	(839)	(836)	(3)
1,495	2,384	Corporate Operating Budgets	3,879	3,464	(415)	(415)	0
19,216	(10,656)	Development & Risk Contingency	8,560	8,712	152	201	(49)
454	0	Priority Growth	454	454	0	0	0
5,451	(4,270)	Unallocated Budget Items	1,181	1,181	0	0	0
220,695	0	Sub-total Normal Activities	220,695	219,593	(1,102)	(1,050)	(52)
0	(4,054)	Exceptional Items IBCF Allocation (announced March 2017)	(4,054)	(4,054)	0	0	0
220,695	(4,054)	Total Net Expenditure	216,641	215,539	(1,102)	(1,050)	(52)
(215,695)	0	Budget Requirement	(215,695)	(215,695)	0	0	0
5,000	(4,054)	Net Total	946	(156)	(1,102)	(1,050)	(52)
(38,738)	0	Balances b/fwd	(38,738)	(38,738)			
(33,738)	(4,054)	Balances c/fwd 31 March 2018	(37,792)	(38,894)			

17. As a result of the forecast position detailed above, General Fund Balances are expected to total £38,894k at 31 March 2018. The Council's current MTFF assumes that unallocated balances will remain between £15,000k and £32,000k to manage emergent risks, with any sums above that level earmarked for use to smooth the impact of government funding cuts.

Directorate Operating Budgets (£839k underspend, £3k improvement)

18. Table 2 provides an overview of the forecast outturn on Directorate Operating Budgets as at Month 9 with further detail for each directorate contained within Appendix A to this report.
19. The Council is currently permitted to finance the costs associated with service transformation from Capital Receipts, with both one-off implementation costs and the support for service transformation, including the BID team, being funded from this resource. Current projections include an estimate of £4,434k for such costs, which will remain under review over the remainder of the year and have been excluded from reported monitoring positions. It is anticipated that these costs will be financed from a combination of Capital Receipts and Earmarked Reserves.

Table 2: Directorate Operating Budgets

Original Budget £'000	Budget Changes £'000	Service	Month 9		Variance (As at Month 9) £'000	Variance (As at Month 8) £'000	Movement from Month 8 £'000	
			Revised Budget £'000	Forecast Outturn £'000				
7,141	323	Chief Executive's Office	Expenditure	7,464	7,473	9	0	9
(1,103)	32		Income	(1,071)	(1,081)	(10)	(1)	(9)
6,038	355		Sub-Total	6,393	6,392	(1)	(1)	0
16,640	863	Finance	Expenditure	17,503	17,438	(65)	(63)	(2)
(3,517)	139		Income	(3,378)	(3,609)	(231)	(232)	1
13,123	1,002		Sub-Total	14,125	13,829	(296)	(295)	(1)
109,841	4,080	Residents Services	Expenditure	113,921	114,869	948	1,095	(147)
(36,991)	(4,590)		Income	(41,581)	(42,917)	(1,336)	(1,455)	119
72,850	(510)		Sub-Total	72,340	71,952	(388)	(360)	(28)
129,618	12,883	Social Care	Expenditure	142,501	142,317	(184)	(256)	72
(27,550)	(1,188)		Income	(28,738)	(28,708)	30	76	(46)
102,068	11,695		Sub-Total	113,763	113,609	(154)	(180)	26
194,079	12,542	Total Directorate Operating Budgets		206,621	205,782	(839)	(836)	(3)

20. No overall movement is forecast across the Chief Executive's Office this month, however revised staffing projections in Legal Services have been off-set by increased income projections across both Human Resources and Legal Services.
21. A marginal £1k improvement is reported against Finance budgets at Month 9 mainly due to reduced non-staffing expenditure across the directorate, being off-set by increased staffing projections in Procurement.
22. A £28k improvement is reported across Residents Services at Month 9 as a result of a number of compensatory movements across Infrastructure, Waste & ICT and Technical Administration & Business Services. The £388k underspend across the directorate continues to be as a result of a number of posts remaining vacant throughout the year, being off-set by large Fleet & ICT pressures alongside continuing income pressures within the Uxbridge Town Centre car parks and Imported Food Sampling.
23. At Month 9, a marginal £26k adverse movement is reported across Social Care budgets due to an increase in the cost of Family Group Conferencing. The overall underspend within Social Care continues to be driven by a large number of staffing underspends where high

numbers of posts are being held vacant, off-set by pressures against legal counsel, agency workers in Children's Services and reduced income from the DSG for the Educational Psychology Service.

Progress on Savings

24. The Council's 2017/18 General Fund revenue budget contains £15,508k savings, with all prior year savings delivered in full during 2016/17. £15,141k savings are reported as banked or on track for delivery at Month 9, with the remaining £367k savings being classed as Amber. Items reported as Amber are ultimately expected to be delivered in full, with no items are being reported as having serious risks of non-delivery.

Table 3: Savings Tracker

2017/18 General Fund Savings Programme	CE's Office & Finance	Residents Services	Social Care	Cross Cutting	Total Savings	
	£'000	£'000	£'000	£'000	£'000	%
B Banked	(1,077)	(5,129)	(5,527)	(313)	(12,046)	77.7%
G On track for delivery	0	(807)	(1,587)	(701)	(3,095)	20.0%
A Potential significant savings shortfall or a significant or risky project which is at an early stage;	0	(267)	0	(100)	(367)	2.4%
R Serious problems in the delivery of the saving	0	0	0	0	0	0.0%
Total 2017/18 Savings	(1,077)	(6,203)	(7,114)	(1,114)	(15,508)	100.0%

Corporate Operating Budgets (£415k underspend, no movement)

25. Corporately managed expenditure includes revenue costs of the Council's Capital Programme, the net impact of Housing Benefit Subsidy arrangements on the Council, externally set levies and income arising from the provision of support services to other funds and ring-fenced budgets.
26. An underspend of £401k is reported across Interest and Investment Income as a result of deferral of external borrowing and an improved outlook for investment income. Within Levies and Other Corporate Budgets, reduced uptake of the Council Tax Older People's Discount supplements the compensatory variances on New Homes Bonus Refund Grant and the West London District Coroners Services.
27. While there has been no material movement in the net impact of Housing Benefit Subsidy upon the Council's financial position, levels of benefit payments and associated subsidy income from the Department of Work and Pensions continue to exceed original estimates which were based upon DWP projections for claimant numbers.

Table 4: Corporate Operating Budgets

Original Budget	Budget Changes	Service	Month 9		Variance (As at Month 9)	Variance (As at Month 8)	Movement from Month 8	
			Revised Budget	Forecast Outturn				
£'000	£'000		£'000	£'000	£'000	£'000	£'000	
0	0	Interest and Investment Income	Salaries	0	0	0	0	0
5,259	0		Non-Sal Exp	5,259	4,899	(360)	(360)	0
(104)	0		Income	(104)	(145)	(41)	(41)	0
5,155	0		Sub-Total	5,155	4,754	(401)	(401)	0
450	0	Levies and Other Corporate Budgets	Salaries	450	450	0	0	0
11,237	28		Non-Sal Exp	11,265	11,356	91	91	0
(14,788)	2,507		Income	(12,281)	(12,387)	(106)	(106)	0
(3,101)	2,535		Sub-Total	(566)	(581)	(15)	(15)	0
0	0	Housing Benefit Subsidy	Salaries	0	0	0	0	0
144,372	(1,419)		Non-Sal Exp	142,953	144,783	1,830	2,234	(404)
(144,931)	1,268		Income	(143,663)	(145,492)	(1,829)	(2,233)	404
(559)	(151)		Sub-Total	(710)	(709)	1	1	0
1,495	2,384	Total Corporate Operating Budgets		3,879	3,464	(415)	(415)	0

Development & Risk Contingency (£152k overspend, £49k improvement)

28. The Council set aside £19,216k to manage volatile and uncertain elements of budgets within the Development & Risk Contingency, which included £18,466k in relation to specific risk items and £750k as General Contingency to manage unforeseen issues. £10,656k of this budget was released into base budgets during Month 7 to reflect growth which is no longer contingent. As expected with such potentially volatile areas of activity, these will continue to be closely monitored over the coming year.

Table 5: Development & Risk Contingency

Original Budget £'000	Budget Changes £'000	Service	Month 9		Variance (As at Month 9) £'000	Variance (As at Month 8) £'000	Movement from Month 8 £'000	
			Revised Budget £'000	Forecast Outturn £'000				
291	0	Fin.	Uninsured claims	291	291	0	0	0
1,736	0	Residents Services	Impact of Welfare Reform on Homelessness	1,736	1,736	0	0	0
3,522	(2,728)		Waste Disposal Levy & Associated Contracts	794	485	(309)	(309)	0
100	0		High Speed 2 Challenge Fund	100	100	0	0	0
200	0		Heathrow Expansion Challenge Fund	200	200	0	0	0
1,648	0	Social Care	Asylum Service	1,648	1,970	322	322	0
5,298	(5,038)		Demographic Growth - Looked After Children	260	1,290	1,030	1,030	0
277	0		Social Worker Agency Contingency	277	277	0	0	0
184	0		SEN transport - Contingency	184	300	116	67	49
2,910	(1,699)		Demographic Growth - Transitional Children	1,211	880	(331)	(233)	(98)
785	(432)		Demographic Growth - Adults	353	0	(353)	(353)	0
197	0		Winterbourne View	197	50	(147)	(147)	0
759	(759)		Deprivation of Liberty Safeguards	0	0	0	0	0
559	0	Corp. Items	Apprenticeship Levy	559	383	(176)	(176)	0
750	0		General Contingency	750	750	0	0	0
19,216	(10,656)	Total Development & Risk Contingency		8,560	8,712	152	201	(49)

29. The reduction of households in high-cost B&B has continued into December, which is in alignment with MTFE assumptions. High cost B&B numbers continue to be closely monitored alongside the related Section 17 costs within Social Care. It is forecast that Earmarked Reserve drawdowns will be required, alongside the full contingency allocation, to secure appropriate and sustainable private sector accommodation.
30. The one-off disbursement from the West London Waste Alliance in respect of excess reserves continues to result in a £309k underspend against waste disposal. The wider position on waste disposal costs continues to remain consistent with budget assumptions.

31. The projected drawdown from the Asylum contingency continues to be forecast as a £322k pressure. This is as a result of the reduction in income following confirmation from the Home Office that a number of supported individuals will no longer be eligible for funding.
32. There is no movement forecast against the Looked After Children contingency item, where a £1,030k pressure continues to be reported, which predominantly relates to the cost of Children with Disabilities (CWD) placements and adoption, where the service is having to place children outside of the Borough.
33. There is an adverse movement of £49k against the SEN transport contingency item as a result of a further increase in the number of pupils requiring SEN Transport. This movement is in line with the increase of children requiring an Education, Health & Care Plan (EHCP).
34. The Transitional Children contingency item is forecasting an improvement of £98k from the Month 8 position due to a number of clients entering the service at lower than anticipated costs as they are remaining in education settings for longer periods (which is part funded by the DSG).
35. As in previous years, the Council retains a General Contingency to meet the costs of exceptional or emerging pressures which had not been specifically provided for at the time of budget setting. To date there have been no formal calls on this £750k provision, although a proportion of this sum is expected to be required to manage exceptional costs of responding to fly tipping once final costs have been determined. Any balances not required will be available to further supplement General Balances at outturn if requirements are not identified during 2017/18.

Priority Growth

36. The 2017/18 General Fund revenue budget approved by Council in February 2017 set aside £254k of unallocated Priority Growth, in addition to £200k of base budget available to support HIP Initiatives. The 2017/18 HIP budget is supplemented by £954k brought forward balances, to provide £1,154k resources for HIP Initiatives.
37. As at Month 9, £320k of projects have been approved for funding from HIP resources, leaving £834k available for future release. The £20k allocation of Priority Growth in Table 6 below is as a result of the recommendation in the December Cabinet Report relating to the refurbishment works at Willow Tree Centre.

Table 6: Priority Growth

Original Budget	Budget Changes	Priority Growth	Month 9		
			Revised Budget	Approved Allocations	Unallocated Balance
£'000	£'000		£'000	£'000	£'000
200	0	HIP Initiatives Budgets	200	0	(200)
0	954	B/fwd Funds	954	320	(634)
254	0	Unallocated Priority Growth	254	20	(234)
454	954	Total Priority Growth	1,408	340	(1,068)

Schools Budget

38. An in-year overspend of £1,933k is projected against the Dedicated Schools Grant in 2017/18, bringing the brought forward deficit on the centrally retained reserve to £3,069k. This position reflects pressures of £2,433k mainly due to a significant increase in the cost of placements as the service moves all children onto Education & Health Care Plans (EHCPs) being off-set by £500k contingency provision held back to manage such emerging pressures. Any residual deficit on the retained reserve is expected to ultimately be recouped from future Dedicated Schools Grant allocations and therefore not impact directly upon the General Fund position.

Collection Fund

39. No movement is reported against the Collection Fund at Month 9, where a headline surplus of £2,611k is projected at Month 9, made up of a £2,680k surplus on Council Tax and £69k deficit on the retained share of Business Rates. This surplus is expected to be available for release to the General Fund in 2018/19.
40. The surplus is made up of a £2,680k surplus against Council Tax off-set by a forecast deficit of £69k against Business Rates. The position on Council Tax includes £2,004k from the release of historic provisions for doubtful debt following the adoption of an improved accounting methodology from 2016/17, alongside an in-year surplus of £676k primarily attributable to strong collection performance. The in-year surplus on Business Rates activity is not sufficient to off-set the £408k pressure against the brought forward £2,000k surplus from an increase in Empty Property Relief awarded during 2016/17, which results in an overall £69k deficit on Business Rates

Housing Revenue Account

41. The Housing Revenue Account (HRA) is currently forecasting an underspend of £2,275k against the budgeted deficit of £11,664k, an improvement of £791k from Month 8. This position results in a projected closing HRA General Balance of £36,437k.
42. 46 properties have been sold under Right to Buy at the end of Month 9, with a further 14 completions anticipated during 2017/18. Sufficient expenditure on the acquisition of new properties was incurred to fully utilise the initial tranche of retained receipts and therefore avoid any repayment of receipts and penalty interest to DCLG during Quarters 1, 2 and 3.

Future Revenue Implications of Capital Programme

43. Appendix D to this report outlines the forecast outturn on the 2017/18 to 2021/22 Capital Programme, with a £658k underspend projected over the five year programme. Prudential Borrowing required to support the Council's Capital Programme is projected to be £4,826k lower than the £102,775k revised budget, primarily as a result of a £12,420k favourable variance on Government Grants being off-set by a £4,851k shortfall in Capital Receipts forecast over the medium term. This favourable variance on borrowing would ultimately result in a reduction in future revenue costs of approximately £260k per annum.
44. 2017/18 capital expenditure is projected to be £13,630k lower than the £63,011k budget, indicating that the Council will be able to defer new borrowing into later years and therefore deliver savings against capital financing budgets in 2018/19. Slippage in delivery of Capital

Receipts will reduce any such saving; with current forecasts showing that £17,020k of the planned £23,475k will be secured during 2017/18.

Appendix A – Detailed Group Forecasts (General Fund)

CHIEF EXECUTIVE'S OFFICE (£1k underspend, nil movement)

46. The overall position for the Chief Executive's Office at Month 9 is an underspend of £1k, representing nil movement from Month 8. This includes covering a Managed Vacancy Factor (MVF) saving of £154k achieved through part-year vacancies and non-salary underspends across the Group.

Table 7: Chief Executive's Office Operating Budgets

Original Budget £'000	Budget Changes £'000	Service	Month 9		Variance (As at Month 9) £'000	Variance (As at Month 8) £'000	Movement from Month 8 £'000	
			Revised Budget £'000	Forecast Outturn £'000				
1,466	22	Democratic Services	Salaries	1,488	1,496	8	12	(4)
1,669	26		Non-Sal Exp	1,695	1,731	36	23	13
(596)	(58)		Income	(654)	(608)	46	36	10
2,539	(10)		Sub-Total	2,529	2,619	90	71	19
2,001	(86)	Human Resources	Salaries	1,915	1,943	28	22	6
89	292		Non-Sal Exp	381	307	(74)	(68)	(6)
(247)	90		Income	(157)	(183)	(26)	(17)	(9)
1,843	296		Sub-Total	2,139	2,067	(72)	(63)	(9)
1,833	69	Legal Services	Salaries	1,902	1,935	33	20	13
83	0		Non-Sal Exp	83	61	(22)	(9)	(13)
(260)	0		Income	(260)	(290)	(30)	(20)	(10)
1,656	69		Sub-Total	1,725	1,706	(19)	(9)	(10)
5,300	5	Chief Executive's Office Directorate	Salaries	5,305	5,374	69	54	15
1,841	318		Non-Sal Exp	2,159	2,099	(60)	(54)	(6)
(1,103)	32		Income	(1,071)	(1,081)	(10)	(1)	(9)
6,038	355		Total	6,393	6,392	(1)	(1)	0

Democratic Services (£90k overspend, £19k adverse movement)

47. An adverse movement of £19k is reported in Democratic Services from Month 8, due in the main to revised printing and postage costs associated with Individual Electoral Registration, alongside continuing income pressures demonstrated by a fall in demand for Nationality Checking and Citizenship Ceremonies.

Human Resources (£72k underspend, £9k improvement)

48. At Month 9, Human Resources is reporting an underspend of £72k, a £9k improvement from the position at Month 8. Within the position, a forecast pressure on salaries reflects a fully staffed establishment, however, this is mitigated by non-staffing underspends on Learning & Development budgets.

Legal Services (£19k underspend, £10k improvement)

49. Legal Services is reporting an underspend of £19k at Month 9, representing an improvement of £10k on the month, due to an improved income position, with mitigating movement across Staffing and Non-Staffing expenditure.
50. For 2017/18, the full £221k savings presented by the Chief Executive's Office have been banked. A further cross-cutting MTFF proposal of £559k for the council's contribution to the Apprenticeship Levy is being managed within HR, and at Month 9 £198k has been banked with the remaining £361k marked as on track for delivery. Up to Month 9, 21 Apprentice posts have been appointed to, with a further 27 posts in development / recruitment stages.

FINANCE (£296k underspend, £1k improvement)

52. The Finance Group is reporting an underspend of £296k at Month 9, an improvement of £1k on the position at Month 8, and includes covering a Managed Vacancy Factor of £376k.

Table 8: Finance Operating Budgets

Original Budget £'000	Budget Changes £'000	Service	Month 9		Variance (As at Month 9) £'000	Variance (As at Month 8) £'000	Movement from Month 8 £'000	
			Revised Budget £'000	Forecast Outturn £'000				
942	869	Business Assurance	Salaries	1,811	1,764	(47)	(55)	8
1,404	2		Non-Sal Exp	1,406	1,434	28	31	(3)
(659)	0		Income	(659)	(638)	21	21	0
1,687	871		Sub-Total	2,558	2,560	2	(3)	5
1,608	0	Procurement	Salaries	1,608	1,597	(11)	(28)	17
75	0		Non-Sal Exp	75	72	(3)	3	(6)
(31)	0		Income	(31)	(35)	(4)	(4)	0
1,652	0		Sub-Total	1,652	1,634	(18)	(29)	11
3,127	527	Corporate Finance	Salaries	3,654	3,507	(147)	(138)	(9)
(7)	2,030		Non-Sal Exp	2,023	2,026	3	4	(1)
(127)	(46)		Income	(173)	(187)	(14)	(14)	0
2,993	2,511		Sub-Total	5,504	5,346	(158)	(148)	(10)
4,382	(30)	Revenues & Benefits	Salaries	4,352	4,535	183	184	(1)
1,841	0		Non-Sal Exp	1,841	1,799	(42)	(35)	(7)
(2,360)	150		Income	(2,210)	(2,443)	(233)	(234)	1
3,863	120		Sub-Total	3,983	3,891	(92)	(85)	(7)
1,034	(531)	Pensions, Treasury & Statutory Accounting	Salaries	503	472	(31)	(31)	0
2,234	(2,004)		Non-Sal Exp	230	232	2	2	0
(340)	35		Income	(305)	(306)	(1)	(1)	0
2,928	(2,500)		Sub-Total	428	398	(30)	(30)	0
11,093	835	Finance Directorate	Salaries	11,928	11,875	(53)	(68)	15
5,547	28		Non-Sal Exp	5,575	5,563	(12)	5	(17)
(3,517)	139		Income	(3,378)	(3,609)	(231)	(232)	1
13,123	1,002		Total	14,125	13,829	(296)	(295)	(1)

Business Assurance (£2k overspend, £5k adverse movement)

53. Business Assurance is projecting a small pressure of £2k at Month 9, an adverse movement of £5k on the month relating to increased staffing costs. Within the position, an underspend on salaries, which includes covering an MVF of £61k, reflects part year vacancies following phase 1 implementation of Business Assurance restructure proposals. Non-Staffing pressures primarily reflect training costs associated with implementation of new Health and Safety software, with income shortfall assumptions a result of reduced demand for Health and Safety Courses chargeable to external bodies.

Procurement (£18k underspend, £11k adverse movement)

54. Procurement is reporting an underspend of £18k at Month 9, representing an £11k adverse movement from Month 8, relating to staffing assumptions with post cover for maternity leavers. The overachievement of income reflects a rebate against pcard expenditure, while the non-staffing position reflects lower than anticipated legal spend on contract disputes.

Corporate Finance (£158k underspend, £10k improvement)

55. Corporate Finance is reporting an underspend of £158k at Month 9, representing a £10k improvement on the month, primarily due to revise staffing costs and part year vacancies. The overall staffing underspend reflects implementation of the Finance Phase 1 business case delivering MTFF savings in 2018/19, with the anticipated overachievement of income relating to S46 Receivership Fees.

Revenues & Benefits (£92k underspend, £7k improvement)

56. Revenues and Benefits is reporting an improvement of £7k on the month, due in the main to revised printing costs. Staffing pressures reflect the cost of temporary agency workers employed on a performance based scheme, which aims to cut down fraud and reduce errors in Housing Benefit claims, funded directly from grant contributions. Part year vacancies and grant income are contributing to the service underspend.

Pensions, Treasury & Statutory Accounting (£30k underspend, nil movement)

57. Pensions, Treasury and Statutory Accounting is reporting an underspend of £30k, a nil movement from the Month 8 position. The favourable position is primarily due a vacant post held within the team, alongside the rebate outlined above received in the month.
58. The full £856k Finance savings proposed as part of the MTFF 2017/18 have been banked.

Table 9: Finance Development & Risk Contingency

Original Budget	Budget Changes	Development & Risk Contingency	Month 8		Variance (As at Month 8)	Variance (As at Month 7)	Movement from Month 7
			Revised Budget	Forecast Outturn			
£'000	£'000		£'000	£'000	£'000	£'000	£'000
291	0	Uninsured claims	291	291	0	0	0
291	0	Current Commitments	291	291	0	0	0

59. The Development and Risk Contingency budget for Uninsured Claims is forecast to breakeven at Month 9, reporting no movement from the previous assumptions. Contingency, alongside base budget of £359k is expected to fully cover the cost of General Fund insurance claim payments below current deductible levels. Expenditure variances beyond this level can be managed from existing Insurance reserves.

RESIDENTS SERVICES (£388k underspend, £28k improvement)

60. Residents Services directorate is showing a projected outturn underspend of £388k at Month 9, excluding pressure areas that have identified contingency provisions.

Table 10: Residents Services Operating Budgets

Original Budget £'000	Budget Changes £'000	Service	Month 9		Variance (As at Month 9) £'000	Variance (As at Month 8) £'000	Movement from Month 8 £'000	
			Revised Budget £'000	Forecast Outturn £'000				
15,219	1,620	Infrastructure, Waste and ICT	Salaries	16,839	16,196	(643)	(468)	(175)
31,833	3,380		Non-Sal Exp	35,214	36,046	832	659	173
-9,790	(618)		Income	(10,408)	(10,691)	(283)	(373)	90
37,262	4,382		Sub-Total	41,645	41,551	(94)	(182)	88
16,922	(751)	Housing, Environment, Education, Health & Wellbeing	Salaries	16,171	15,952	(219)	(150)	(69)
23,024	201		Non-Sal Exp	23,225	24,205	980	959	21
-16,874	(484)		Income	(17,358)	(18,164)	(806)	(901)	95
23,072	(1,034)		Sub-Total	22,038	21,993	(45)	(92)	47
7,430	(3,731)	Planning, Transportation & Regeneration	Salaries	3,699	3,804	105	117	(12)
1,901	(1,132)		Non-Sal Exp	769	1,214	445	419	26
-6,397	3,030		Income	(3,367)	(4,111)	(744)	(730)	(14)
2,934	(1,833)		Sub-Total	1,101	907	(194)	(194)	0
1,777	(252)	Performance & Improvement	Salaries	1,525	1,504	(21)	(19)	(2)
160	0		Non-Sal Exp	160	169	9	9	0
-270	252		Income	(18)	(21)	(3)	(3)	0
1,667	0		Sub-Total	1,667	1,652	(15)	(13)	(2)
10,766	1,889	Administrative, Technical & Business Services	Salaries	12,655	11,785	(870)	(818)	(52)
809	2,855		Non-Sal Exp	3,664	3,994	330	387	(57)
-3,660	(6,770)		Income	(10,430)	(9,930)	500	552	(52)
7,915	(2,026)		Sub-Total	5,889	5,849	(40)	121	(161)
52,114	(1,225)	Residents Services Directorate	Salaries	50,889	49,241	(1,648)	(1,338)	(310)
57,727	5,305		Non-Sal Exp	63,032	65,628	2,596	2,433	163
-36,991	(4,590)		Income	(41,581)	(42,917)	(1,336)	(1,455)	119
72,850	(510)		Total	72,340	71,952	(388)	(360)	(28)

61. The overall variance is a result of staffing underspends across the directorate, with these favourable variances offset in part by pressures in ICT and fleet management, as well as parking income shortfalls at Cedars and Grainges car parks and in Imported Food sampling.

62. The Council's 2017/18 contingency budget contains provision for areas of expenditure or income within Residents Services for which there is a greater degree of uncertainty. The position against these contingency items is shown in Table 11 below.

63. At Month 9 projected calls on contingency are £309k below the budgeted provision (no change). The table below shows the breakdown for each contingency item.

Table 11: Development and Risk Contingency

Original Budget	Budget Changes	Development & Risk Contingency	Month 9		Variance (As at Month 9)	Variance (As at Month 8)	Movement from Month 8
			Revised Budget	Forecast Outturn			
£'000	£'000		£'000	£'000	£'000	£'000	£'000
1,736	0	Impact of Welfare Reform on Homelessness	1,736	1,736	0	0	0
3,522	(2,728)	Waste Disposal Levy & Associated Contracts	794	485	(309)	(309)	0
100	0	High Speed 2 Challenge Fund	100	100	0	0	0
200	0	Heathrow Expansion Challenge Fund	200	200	0	0	0
5,558	(2,728)	Current Commitments	2,830	2,521	(309)	(309)	0

64. The Month 9 data in Table 12 below shows a reduction from the previously reported B&B figures earlier in the financial year, following the impact of increased prevention work. The reducing number of Households in higher cost Bed & Breakfast accommodation is in line with MTFE assumptions made by officers in modelling Supply and Demand, with the fluctuation in demand managed with existing budgets.

Table 12: Housing Needs performance data

	2017		
	October	November	December
Homeless Threat, Priority Need & Eligible	133	134	72
Presenting As Homeless	36	41	37
Duty Accepted	19	15	20
Households in Temporary Accommodation	571	560	551
Households in B&B	198	182	171

65. As in previous years, a contingency has been set aside in 2017/18 to resource the need for Temporary Accommodation in the borough. The call on contingency relating to homelessness remains as per prior projections of £1,736k, which is as per the budgeted provision.
66. The Council will continue to closely monitor this area, given the level of risk and potential cost. It is expected that there will also be a requirement to draw on the Housing Incentives earmarked reserve given the costs of securing private sector accommodation, with any drawdown being subject to the usual approvals.
67. Drawdown of £2,728k has been approved by Cabinet from the contingency of £3,522k set aside to fund estimated increases in waste tonnages via the levy. There is a projected drawdown at year end of £485k from the remaining contingency of £794k, with the £309k variance a result of one-off disbursement of reserves from WLWA earlier in the year.

Infrastructure, Waste and ICT (£94k underspend, £88k adverse movement)

68. Forecasts for month 9 have been realigned to the new SMT structure implemented from mid-January, with the associated variances from month 8 restated accordingly.

69. The overall forecast encompasses a significant quantum of management actions, mainly within Highways, Waste and Fleet services, which will be closely monitored during the remainder of the financial year. At month 9, the service is reporting a net adverse movement of £88k from the month 8 position.
70. There is an adverse movement for Fleet of £115k reflecting additional fuel and vehicle damage costs, following the recent upward trend of diesel prices, revised vehicle maintenance costs and vehicle damage.
71. In addition, there is an adverse movement in Waste Services of £55k, relating to the change in market conditions for plastic recyclates, following China's decision to discontinue accepting imported plastics from overseas from 1st January 2018.
72. This adverse movement is partially netted down by favourable movements in staffing as a result of recruitment delays in Property & Estates and ICT (£82k).

Housing, Environment, Education, Health & Wellbeing (£45k underspend, £47k adverse movement)

73. The overall forecast contains a number of management actions which will continue to be monitored closely until close of the financial year.
74. At Month 9 the service is reporting an underspend projection of £45k, £47k adverse movement. The adverse movement relates to increased non-staffing costs in Greenspaces including increased forecasts for grounds maintenance (£22k) and equipment maintenance (£25k).

Planning, Transportation & Regeneration (£194k underspend, no change)

75. At Month 9 there is a projected underspend of £194k (no movement) across the service area, with the underspend predominantly a result of robust income streams across planning services.

Performance & Improvement (£15k underspend, £2k improvement)

76. There is a favourable movement of £2k relating to revised staffing projections for the Corporate Communications team, as a result of holding a post vacant for the remainder of the financial year.

Administrative, Technical & Business Services (£40k underspend, £161k improvement)

77. The service is reporting a £40k underspend at Month 9, representing a £161k favourable movement from the Month 8 position.
78. The net favourable movement is a result of staffing underspends across the service, with the movement of £35k favourable primarily owing to recruitment slippage for Business Support and Technical Administration roles. In addition there is a favourable movement of £25k relating to improved staffing projections for the contact centre, £8k for parking management and £5k for licensing. In addition, there are favourable movements relating to reduced costs via the enforcement contract (£30k).

79. Parking services continue to forecast income shortfalls at Uxbridge car parks, however for Month 9 there is a £12k favourable movement in the forecast, bringing the overall pressure to £480k. These are netted down by wider parking income streams including the PRA.
80. There is a forecast improvement in Food Safety services following a reduced forecast for analysts' fees (£23k) and an improvement in projected income streams following additional products coming under additional inspection requirements (£23k).

SOCIAL CARE (£154k underspend, £26k adverse movement)

81. Social Care is projecting an underspend of £154k at Month 9, an adverse movement of £26k on the Month 8 position, due to an increase in the cost of Family Group Conferencing, which is proving successful in preventing children from entering the care system. The underspend relates predominantly to staffing costs, where there are a number of vacant posts which are not being covered by agency assignments. However, there are still underlying pressures that are being managed across the service, which include the cost of Agency Social Workers in Children's Services, the cost of external legal counsel providing support for Children's Services, reduced income from the Dedicated Schools Grant for the Educational Psychology Service and the cost of temporary bed and breakfast accommodation for families supported under the Section 17 regulations.

Table 13: Social Care Operating Budgets

Original Budget £'000	Budget Changes £'000	Service	Month 9		Variance (As at Month 9) £'000	Variance (As at Month 8) £'000	Movement from Month 8 £'000	
			Revised Budget £'000	Forecast Outturn £'000				
13,299	455	Children's Services	Salaries	13,754	14,122	368	373	(5)
12,635	4,896		Non-Sal Exp	17,531	17,632	101	53	48
(7,804)	515		Income	(7,289)	(7,274)	15	15	0
18,130	5,866		Sub-Total	23,996	24,480	484	441	43
7,784	208	Early Intervention, Prevention & SEND	Salaries	7,992	7,644	(348)	(344)	(4)
6,257	(80)		Non-Sal Exp	6,177	6,066	(111)	(111)	0
(2,370)	(308)		Income	(2,678)	(2,368)	310	313	(3)
11,671	(180)		Sub-Total	11,491	11,342	(149)	(142)	(7)
4,597	(96)	Older People & Physical Disabilities Service	Salaries	4,501	4,341	(160)	(126)	(34)
34,209	3,469		Non-Sal Exp	37,678	37,947	269	285	(16)
(11,146)	(750)		Income	(11,896)	(11,990)	(94)	(128)	34
27,660	2,623		Sub-Total	30,283	30,298	15	31	(16)
11,537	(517)	Adult Social Care - Provider & Commissione d Care	Salaries	11,020	10,766	(254)	(331)	77
5,874	674		Non-Sal Exp	6,548	6,359	(189)	(166)	(23)
(590)	(32)		Income	(622)	(582)	40	39	1
16,821	125		Sub-Total	16,946	16,543	(403)	(458)	55
4,341	(603)	Learning and Disability and Mental Health Service	Salaries	3,738	3,777	39	12	27
29,435	4,114		Non-Sal Exp	33,549	33,643	94	92	2
(5,264)	(989)		Income	(6,253)	(6,494)	(241)	(163)	(78)
28,512	2,522		Sub-Total	31,034	30,926	(108)	(59)	(49)
320	(110)	Directorate & Support Services	Salaries	210	217	7	7	0
(670)	473		Non-Sal Exp	(197)	(197)	0	0	0
(376)	376		Income	0	0	0	0	0
(726)	739		Sub-Total	13	20	7	7	0
41,878	(663)	Social Care Directorate Total	Salaries	41,215	40,867	(348)	(409)	61
87,740	13,546		Non-Sal Exp	101,286	101,450	164	153	11
(27,550)	(1,188)		Income	(28,738)	(28,708)	30	76	(46)
102,068	11,695		Total	113,763	113,609	(154)	(180)	26

SOCIAL CARE DEVELOPMENT AND RISK CONTINGENCY (£637k overspend, £49k improvement)

82. The Council's 2017/18 Development and Risk Contingency includes a provision for areas of expenditure within Social Care for which there is a greater degree of uncertainty. In part, this is caused by in year demographic changes, including Asylum seekers and SEN Transport. At the Cabinet meeting in November 2017, it was agreed that £7,928k of this budget could be transferred into the Social Care base budget. Table 14 sets out the revised Risk Contingency budget for month 9, which takes into account this adjustment and an updated forecast spend against the Development and Risk Contingency, which is now projecting an overspend of £637k, an improvement of £49k on the Month 8 position. This is due to a further reduction in the Transitional Children demographic projections, netted down by an increase in the SEN Transport projections.

Table 14: Social Care Development & Risk Contingency

Original Budget	Budget Changes	Development & Risk Contingency	Month 9		Variance (As at Month 9)	Variance (As at Month 8)	Movement from Month 8
			Revised Budget	Forecast Outturn			
£'000	£'000		£'000	£'000	£'000	£'000	£'000
1,648	0	Asylum Service	1,648	1,970	322	322	0
5,298	(5,038)	Demographic Growth - Looked After Children	260	1,290	1,030	1,030	0
277	0	Social Worker Agency Contingency	277	277	0	0	0
184	0	SEN transport - Contingency	184	300	116	67	49
2,910	(1,699)	Demographic Growth - Transitional Children	1,211	880	(331)	(233)	(98)
785	(432)	Demographic Growth - Adults	353	0	(353)	(353)	0
197	0	Winterbourne View	197	50	(147)	(147)	0
759	(759)	Deprivation of Liberty Safeguards	0	0	0	0	0
12,058	(7,928)	Current Commitments	4,130	4,767	637	686	(49)

Asylum Service (£322k overspend, no change)

83. This service is projecting a drawdown of £1,970k from the contingency, an overspend of £322k as at Month 9 and no change from the Month 8 position. This pressure reflects the impact of a drop in grant income as there are a high proportion of UASC who have and will turn 18 this year, where the grant funding is less than that provided for under 18's. Additionally, with the introduction of the National Transfer Agreement in 2016, the number of under-18 UASC is not anticipated to grow.

84. The service continues to review the support provided to UASC to identify where opportunities can be taken to reduce costs, which includes a review of accommodation and allowances costs, which are fed through into the projections once confirmed. Additionally the service is undertaking a review of the status of Care Leavers to provide further clarity on those that do

receive grant funding from the Home Office and those that do not. A further check is being undertaken on cases that do not receive funding to ensure that they have the relevant status that requires the Council to continue to provide support.

85. There are expected to be future changes to the funding regime, as in August 2017, the Home Office started its review of the grant funding that they provide to support UASC for 2018/19. However, as of to date, no updates have been provided.

Demographic Growth - Looked After Children (£1,030k overspend, no change)

86. The service is projecting a drawdown of £1,290k from the Contingency, £1,030k above the budget, no change on the Month 8 position. The overspend reported predominantly relates to the cost of CWD placements and the cost of adoption, where the Service is having to place children outside of the Borough. Both of these areas are being reviewed by the service.
87. The underlying position on the placements budget continues to show an improvement on the 2016/17 position, especially with regards to the number of children placed in Residential placements, where the numbers have dropped, from a high of 36 at the beginning of 2016/17 to 22 as at the end of December 2017. Based on an annualised cost, this translates into a cost reduction and avoidance of £1,179k, reducing from £5,563k to £4,384k. However, this position can fluctuate given the wide potential variation in Children's placements costs.

Social Worker Agency (Children's) (Nil variance, no change)

88. This contingency provides funding to cover the additional cost of using agency staff whilst the service undertakes recruitment activity. For the 2017/18 financial year it was assumed that the service will operate at a level of 90% of posts filled by permanent staff and 10% filled by agency staff. However the recruitment of Social Workers continues to be very competitive, and as a consequence the permanency rate is currently forecast at approximately 80% for this financial year. Therefore, the full drawdown of this contingency will be required.

Demographic Growth - SEN Transport (£116k overspend, £49k adverse movement)

89. The service is projecting a drawdown of £300k from the SEN Transport contingency, £116k above the budget, a £49k increase on the month 8 position, due to a further increase in the number of pupils requiring SEN Transport, which corresponds to the increase being experienced in the number of children requiring an Education, Health and Care Plan (EHCP). Generally, the main increase in this service is usually seen at the start of the new school year; however, for this academic year there appears to be a more sustained growth across the months, where from September 2017 to December 2017 there has been a net growth of circa 61 clients. Although the majority of these new clients have been put on existing routes, several new routes have had to be added with additional passenger assistant costs. Personal Transport Budgets (PTBs) have been offered to clients as a cheaper alternative to routes when possible, and there has been a corresponding increase. . Over the last few months, it is clear that the growth in the Special Educational Need children population is continuing at an exponential rate, which is starting to feed through into the transport service. As stated, the service are ensuring that all existing routes are maximised, but it is clear that in the majority of cases the existing routes no longer have any spare capacity.

Demographic Growth - Transitional Children (£331k underspend, £98k improvement)

90. The service is projecting a reduced drawdown of £880k from the Transitional Children contingency. The improvement is as a result of transition clients entering the service at lower than anticipated costs as they are remaining in education settings for longer periods, part of which is funded from the Dedicated Schools Grant up to and including the age of 24. However, the expectation is that these clients will require higher cost care packages in the future once they leave education and where possible this has been reflected in the MTFF forecasts. This will continue to be monitored closely during the year and the forecast revised to reflect actual placements as the year progresses.

Demographic Growth - Adults Placements (£353k underspend, no change)

91. The service is projecting no drawdown from the Adults Placements contingency, which results in the £353k underspend, no change on the Month 8 position. The main reason for this is primarily due to ongoing process improvements for placements, including timely assessment and recognition of external funding streams, combined with reduced demand for Physical Disability client placements. It should, however, be recognised that the adult population is still growing and that more eligible people still require care, however these care needs are being met in a different way, which in most cases will be at a lower cost than previous clients.

Winterbourne View (£147k underspend, no change)

92. The service is projecting a drawdown of £50k from the Winterbourne View contingency, £147k below the budget. The current assumption is that these clients will be funded by dowry payments; however, discussions at the Transforming Care Partnership (TCP) meetings are indicating that there may not be sufficient funding to cover this from NHS England. Officers are taking the stance that this is not an issue for the Council, as it should be a matter for the CCG to resolve with NHS England.

Deprivation of Liberty Safeguards (DoLS) (Nil variance, no change)

93. This budget has been transferred to the Social Care base budget and as such any variance in this service will be captured within the Learning Disability and Mental Health Service.

DIRECTORATE OPERATING BUDGETS

Children's Services (£484k overspend, £43k adverse movement)

94. The service is reporting an overspend of £484k as at Month 9, an adverse movement of £43k from the Month 8 position. This is due to an increase in the projected costs of Family Group Conferencing, which is proving successful in preventing children from entering the care system. The main reason for the overspend relates to the cost and use of agency staff, which are required to cover essential social worker posts and the costs associated with temporary bed and breakfast accommodation that is a requirement under Section 17 of The Children Act 1989 to support families with children that have become homeless. Within this position there is still a significant legal cost pressure relating to a number of complex cases and the cost of staff recruitment from overseas, which is being managed through prior-year provisions that are no longer required.

Early Intervention, Prevention & SEND (£149k underspend, £7k improvement)

95. The service is reporting an underspend of £147k as at Month 9, a minor improvement of £5k on the Month 8 position. The overall underspend is due to staffing costs, which are projected to underspend by £346k, due to a review of all vacant posts and the need to recruit to them and an underspend on non-staffing costs of £111k due to effective management action to restrict spend on essential items only, netted down by a projected shortfall of £310k in income from the Dedicated Schools Grant for the Educational Psychology Service, where the service has had difficulties in recruiting Educational Psychologists, although recently this position has improved and statutory workloads have reduced, allowing the service to provide a restricted non-statutory function for schools.

Older People and Physical Disabilities (£15k overspend, £16k improvement)

96. The service is reporting an overspend of £15k as at Month 9, an improvement of £16k on the Month 8 position, due to a reduction in the cost of staffing, as recruitment is taking longer than planned and agency staff are leaving at short notice resulting in vacancies.

Adult Social Care - Provider and Commissioned Care (£403k underspend, £55k adverse movement)

97. The service is reporting an underspend of £403k as at Month 9, an adverse movement of £55k on the Month 8 position, due to an increase in the cost of staffing at the Children's Homes, which have become necessary in order to support children with complex needs. The £403k variance relates to an underspend of £254k on staffing costs, due to recruitment difficulties within the Reablement Team and posts that were vacant for part of the year in the Positive Behaviour Support Team. Additionally the non-staffing budget is forecast to underspend by £189k, which predominantly relates to a review of a number of contracts.
98. It should be noted that the Transport Service is reporting an in year overspend of £76k, due to a sustained increase in demand. However, this is a major improvement from the Outturn pressure of £1m in 2016/17 and has been delivered due to the investment in a major service review, which has introduced new and improved ways of working. The service is currently working on a new contract framework and the purchase of a new IT system. Additionally the service plan to undertake a review of the passenger assistant requirement on all SEN home-to-school routes to ensure the agency provision is at an optimum level. As stated above, the Transport service has seen significant client growth for the 2017/18 academic year with an overspend currently projected on contingency. Further growth is expected throughout the year and this will be closely monitored.

Learning Disability and Mental Health (£108k underspend, £49k improvement)

99. The service is forecasting an underspend of £108k as at Month 9, an improvement of £49k on the Month 8 position, which is due to an increase in CCG income for joint funded Social Care packages. The underspend relates to additional income from external bodies, netted down by an overspend of £39k on staffing and an overspend of £94k on non staffing due to increased costs of undertaking Deprivation of Liberty safeguard assessments.

Directorate & Support (£7k overspend, no change)

100. The Directorate budget is forecasting a marginal pressure of £7k as at Month 9, no change from the Month 8 position.

Appendix B – Other Funds

SCHOOLS BUDGET

Dedicated Schools Grant (£1,933k overspend, £277k adverse movement)

101. The Dedicated Schools Grant (DSG) is projecting an in-year overspend of £1,933k as at month 9, an adverse movement of £277k on the Month 8 projections. The movement from month 8 is due to continuing increases in the projected cost of High Needs and revised forecasts in Early Years. When the £1,136k deficit brought forward from 2016/17 is taken into account the deficit to carry forward to 2018/19 will increase to £3,069k.

Table 15: DSG Income and Expenditure 2017/18

Original Budget	Budget Changes	Funding Block	Month 9		Variance (+ adv / - fav)		
			Revised Budget	Forecast Outturn	Variance (As at Month 9)	Variance (As at Month 8)	Change from Month 8
£'000	£'000		£'000	£'000	£'000	£'000	£'000
(148,436)	5,690	Dedicated Schools Grant Income	(142,746)	(142,746)	0	0	0
112,811	(5,490)	Delegated to Schools	107,321	107,321	0	0	0
3,971	(341)	Early Years	3,630	3,650	20	(184)	204
3,889	0	Centrally Retained	3,889	3,970	81	81	0
27,265	141	High Needs	27,406	29,738	2,332	2,259	73
(500)	0	Total Funding Blocks	(500)	1,933	2,433	2,156	277
500	0	Retained Balance	500	0	(500)	(500)	0
(0)	0	Total Schools Budget	0	1,933	1,933	1,656	277
0	0	Balance Brought Forward 1 April 2017	1,136	1,136			
0	0	Balance Carried Forward 31 March 2018	1,136	3,069			

Dedicated Schools Grant Income (nil variance, no change)

102. The budget and projections have been realigned to reflect the updated DSG allocation following confirmation from the Education & Skills Funding Agency (ESFA) of the adjustments to reflect the two school conversions to academy status which took place on the 1 September 2017. There are no further anticipated changes to DSG funding for 2017/18 other than the final Early Years adjustment which will happen in July 2018.

Delegated to Schools (nil variance, no change)

103. The budget has been realigned following the adjustment to the DSG recoupage figures following the conversion to academy status of two schools on 1 September 2017. Academy schools receive schools block funding directly from the ESFA and therefore the DSG payable to the local authority is adjusted to reflect this mid-year change.

Early Years (£20k overspend, £204k adverse movement)

104. The Early Years funding block is projecting an overspend of £20k as at month 9 which is a £204k adverse movement on the position reported at month 8.

105. The movement from month 8 relates partly to revised projections on the amount of fee income expected to be generated at the three Early Years Centres following lower than

forecasted uptake of places. The three centres continue to focus on increasing occupancy levels in order to address the current shortfall, but are now projecting to end the year with an overspend.

106. The projection for the two year old free entitlement has been revised now that full detail of the Autumn term uptake is known. Two year old funding was reduced by £341k in July 2017 following a reduction in the number of children accessing the entitlement based on the January 2017 census. It was anticipated that this funding reduction could be absorbed in the current year, however the number of children increased in the Autumn term which has now led to a projected overspend. There will be a further adjustment to the funding in July 2018 based on numbers recorded in the January 2018 census.
107. The projected overspend is offset by a £119k underspend in the two year old capacity grant funding following a significant reduction in the number of settings applying for grant funding in 2017/18. This is despite the criteria being extended to include early years settings requiring adaptations in order to provide the additional 15 hours free entitlement for 3 & 4 year olds.
108. The Early Years Psychology team are still projecting a £46k underspend where uncertainty continues regarding the delivery model and the capacity of the team to deliver service to the Early Years sector. The current projection is based on the amount of educational psychology time that was allocated to Early Years in 2016/17, though this may actually be lower given the current capacity of the team.
109. There is a £63k underspend across the Early Years Advisory and Family Information Services, both of which currently have vacancies.

Centrally Retained (£81k overspend, no change)

110. The Growth Contingency fund continues to project an overspend due to the diseconomies funding requirement for one of the basic need academies increasing due to low pupil numbers. However, this overspend has been partly off-set by a reduction in the projected expenditure on in-year growth following confirmation of actual pupil numbers from the October census.
111. The increase in the number of pupil exclusions has resulted in £91k additional income as the local authority is able to reclaim some funding from schools relating to excluded pupils. This funding will be used to partly off-set the increase in funding paid to the in-borough alternative provision setting as a consequence of them being over planned place numbers.
112. There are projected underspends in the School Procurement team following the secondment of one of the team from November onwards and the Admissions team due to a current vacant post.

High Needs (£2,332k overspend, £73k adverse movement)

113. The High Needs funding block is projecting an overspend of £2,332k as at Month 9, an adverse movement of £73k on the Month 8 projections, due to continuing pressure linked to the transfer of pupils in special schools from statements to Education & Health Care plans (EHCPs). As pupils are transferred to an EHCP they move onto the new banded funding model often resulting in a higher resource requirement.
114. There is a budget pressure on the placement of pupils with SEN in independent or non-maintained schools. The High Needs budget included a savings target within the budget for

Independent and non-maintained school SEN placements which was dependant on a number of pupils leaving at the end of the summer term 2017 and new placements not being made. However, a number of placements have been made from September 2017, resulting in additional pressure on the High Needs block.

115. The forecast includes additional projected expenditure to cover the cost of an increase in pupils attending in-borough alternative provision. The unit currently has a planned place number of 70; however recent pupil numbers have been in excess of this following an increase in exclusions across the borough. Income has been received from schools that have excluded which has partly off-set this pressure.
116. There is a projected overspend relating to the cost of young people being temporarily educated in independent hospital settings. The local authority has very little control over these placements as they often occur with short notice following emergency intervention.
117. The above budget pressures are off-set by the following projected underspends; the DSG contribution to the non-statutory work of the Educational Psychology team where currently recruiting and retaining Educational Psychologists is proving very difficult making it a significant challenge to deliver anything other than statutory work (there is a national shortage of qualified Educational Psychologists); the SEN contingency budget, where the forecast on the 2% threshold mechanism has reduced following confirmation of the pupil numbers in the October census and in the SEN support services as a result of vacant posts.

School Academy Conversions

118. The Academies Act 2010, allows schools to convert to academy status and by doing so will receive funding directly from the Education Funding Agency (EFA). Schools can convert at any point in the year, once they have converted, a number of adjustments are required to realign the DSG income budget and the amount delegated to maintained schools.
119. There are two maintained primary schools which converted on 1 September 2017. The local authority is not aware of any other schools planning to convert in the current financial year.

Maintained School Balances & Budgets

120. A review of balances at the end of the 2016/17 financial year identified three schools which ended the year in deficit. Any schools that fall into deficit are subject to more focused monthly monitoring by LA officers to ensure that everything possible is being done to address the situation.
121. Maintained schools ended the 2016/17 financial year with a cumulative closing surplus balance of £11.3m (revenue & capital). This was a £1.5m decrease from the previous year, though just under £1m of this was used to fund capital expenditure. Despite the relatively healthy total balance, there are a number of schools which have indicated they are beginning to experience financial difficulties due to funding being cash-limited and year on year increases in costs. However, the implementation of the National Funding Formula from April 2018 indicates that additional resources will be made available in 2018/19, and would provide at least an increase of 0.5%.
122. Of the 54 schools currently maintained by the local authority, two (one primary and one secondary) have been unable to set a balanced budget and will be requesting that the

authority license a deficit. These schools have worked on a deficit recovery plan to demonstrate how they will achieve a balanced budget within at least the next three years.

123. A significant number of schools have submitted budgets with an in-year deficit, resulting in an anticipated budgeted reduction in school revenue balances of £6.1m for 2017/18. This is a concern as the use of balances is one-off and continued in-year deficits are unsustainable in the medium term. The Schools Finance team is working closely with schools to ensure that any financial concerns are addressed as early as possible.

COLLECTION FUND (£2,611k surplus, no movement)

124. The collection of local taxes is managed through the Council's Collection Fund in order to avoid short-term volatility in income impacting on provision of services. Sums quoted relate to the Council's own share of income and disregard monies collected on behalf of the Greater London Authority and Central Government. The projected surplus will be available to support the Council's General Fund budget in 2018/19. At Month 9, a headline surplus of £2,611k is projected on the Council's share of Collection Fund activity for 2017/18, no movement from the previously reported position. The surplus is made up of a £2,680k surplus on Council Tax and £69k pressure on the retained share of Business Rates.

Table 16: Collection Fund

Original Budget £'000	Budget Changes £'000	Service	Month		Variance (As at Month 9) £'000	Variance (As at Month 8) £'000	Movement from Month 8 £'000	
			Revised Budget £'000	Forecast Outturn £'000				
(119,465)	0	Council Tax	Gross Income	(119,465)	(120,317)	(852)	(846)	(6)
11,266	0		Council Tax Support	11,266	11,442	176	176	0
(500)	0		B/fwd Surplus	(500)	(2,504)	(2,004)	(2,004)	0
(108,699)	0		Sub-Total	(108,699)	(111,379)	(2,680)	(2,674)	(6)
(105,520)	0	Business Rates	Gross Income	(105,520)	(106,023)	(503)	(509)	6
(2,350)	0		Section 31 Grants	(2,350)	(2,451)	(101)	(101)	0
51,412	0		Less: Tariff	51,412	51,412	0	0	0
6,217	0		Less: Levy	6,217	6,482	265	265	0
(2,000)	0		B/fwd Deficit	(2,000)	(1,592)	408	408	0
(52,241)	0	Sub-Total	(52,241)	(52,172)	69	63	6	
(160,940)	0	Total Collection Fund	(160,940)	(163,551)	(2,611)	(2,611)	0	

125. At Month 9, a minor £6k movement is reported against Council Tax collection, representing continued strong collection performance. A £176k pressure continues to be reported on the Council Tax Support Scheme, which remains consistent with the assumption that current uptake to the scheme will continue to the end of the Financial Year. The £2,004k brought forward surplus on Council Tax relates primarily to the release of historic provisions following the adoption of an improved methodology in accounting for doubtful debts, which brings the total projected surplus available for release in 2018/19 to £2,680k.

126. The £6k adverse movement across Business Rates income slightly increases the anticipated 2017/18 deficit laid out in the Council's MTF. Strong performance during 2017/18 remains marginally insufficient to off-set the majority of the brought forward deficit.

Appendix C – HOUSING REVENUE ACCOUNT

128. The Housing Revenue Account (HRA) is currently forecasting an in-year overall deficit of £9,389k, which is £2,275k more favourable than the budgeted position. Therefore the 2017/18 closing HRA General Balance is forecasted to be £36,437k.

Table 17: Housing Revenue Account

Service	Month 9		Variance (+ adv / - fav)		
	Revised Budget	Forecast Outturn	Variance (As at Month 9)	Variance (As at Month 8)	Movement from Month 8
	£'000	£'000	£'000	£'000	£'000
Rent Income	(55,064)	(55,577)	(513)	(513)	0
Other Income	(5,494)	(5,144)	350	350	0
Net Income	(60,558)	(60,721)	(163)	(163)	0
Housing Management	12,214	12,768	554	563	(9)
Tenant Services	4,973	4,536	(437)	(363)	(74)
Repairs	5,033	4,764	(269)	(196)	(73)
Planned Maintenance	4,906	2,843	(2,063)	(1,428)	(635)
Capital Programme Funding	28,237	28,237	0	0	0
Interest & Investment Income	15,121	15,224	103	103	0
Development & Risk Contingency	1,738	1,738	0	0	0
Operating Costs	72,222	70,110	(2,112)	(1,321)	(791)
(Surplus) / Deficit	11,664	9,389	(2,275)	(1,484)	(791)
General Balance 01/04/2017	(45,826)	(45,826)	0	0	0
General Balance 31/03/2018	(34,162)	(36,437)	(2,275)	(1,484)	(791)

Income

129. A favourable variance of £513k is forecast on rental income and an adverse variance of £350k is forecast on other income, representing no change from the Month 8 position.

130. The number of RTB applications received in the first nine months of 2017/18 was 129 compared to 222 for the same period in 2016/17, a reduction of 42%. There have been 46 RTB completions in the first nine months of 2017/18 compared to 75 for the same period in 2016/17, a reduction of 39%. The Month 9 forecast assumes RTB sales of 60 for the year, a reduction of 25 compared to the Month 8 forecast.

Expenditure

131. The Housing management service is forecast to overspend by £554k, a favourable movement of £9k on Month 8, due to running costs.
132. Tenant services is forecast to underspend by £437k, a favourable movement of £74k on Month 8, due to updated forecasts on utilities.
133. The repairs budget is forecast to underspend by £269k, a favourable movement of £73k on Month 8, due to capitalisation of expenditure.
134. The Planned Maintenance budget is forecast to underspend by £2,063k, a favourable movement of £635k on Month 8, due to reduced forecast spend on water quality works £258k, release of contingencies £208k, external decorations programme £80k, minor estate improvements £72k and other works £17k.
135. The interest and investment income is forecast to be overspent by £103k, whilst no variance is reported for the capital programme funding and the development and risk contingency. This represents no change from the Month 8 position.

HRA Capital

136. The HRA capital programme is set out in the table below. The 2017/18 original budget is £71,425k and the 2017/18 revised budget is £78,696k.

Table 18: HRA Capital Expenditure

Programme	2017/18 Original Budget	2017/18 Revised Budget	2017/18 Forecast	2017/18 Cost Variance Forecast V Revised Budget	2017/18 Project Re-Phasing	Total Project Budget 2017-2022	Total Project Forecast 2017-22	Total Project Variance 2017-22	Movement 2017-22
	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000
Major Projects									
New General Needs Housing Stock	21,418	17,407	17,002	0	(405)	32,848	32,848	0	0
New Build - Appropriation of Land	8,635	8,635	8,635	0	0	8,635	8,635	0	0
New Build - Shared Ownership	1,720	119	102	0	(17)	7,948	7,948	0	0
New Build - Supported Housing Provision	21,434	20,967	18,650	(1,768)	(549)	37,506	33,831	(3,675)	(3,675)
ICT	0	0	0	0	0	162	162	0	0
HRA General Capital Contingency	9,500	9,270	9,270	0	0	9,270	9,270	0	0
Total Major Projects	62,707	56,398	53,659	(1,768)	(971)	96,369	92,694	(3,675)	(3,675)
Works to Stock									
Works to stock programme	7,626	19,964	15,446	0	(4,518)	48,996	48,996	0	0
Major Adaptations to Property	1,092	2,334	2,334	0	0	6,720	6,720	0	0
Total Works to Stock	8,718	22,298	17,780	0	(4,518)	55,716	55,716	0	0
Total HRA Capital	71,425	78,696	71,439	(1,768)	(5,489)	152,085	148,410	(3,675)	(3,675)
Movement on Month 8	0	0	(1,466)	0	(1,466)	0	0	0	0

Major Projects

137. The 2017/18 Major Projects programme revised budget is £56,398k and the forecast spend is £53,659k, with a forecast underspend of £1,768k and a re-phasing of £971k. The major works cost variance during the period 2017-22 remains an underspend of £3,675k.

New General Needs Housing Stock

138. The 2017/18 General Needs Housing Stock revised budget is £17,407k. There is a forecast re-phasing of £405k across the General Needs programme, representing an adverse movement of £23k on Month 8.

139. Contractors have been appointed for all 3 elements of the housing programme. The building works with respect to the extensions were completed in January 2018 with the sites being prepared for handover. The conversion works are due for completion by the end of February 2018. Contractors are on site with respect to the remaining new build developments across 3 sites, with projected completion by August 2018.

140. Although approval has been obtained for the delivery of 19 units of General Needs Housing stock at Acol Crescent, a revised scheme is currently being reviewed leading to the project being re-phased. A contractor has been appointed to demolish and secure the site prior to commencing development.

141. Lead Consultants and architects have been appointed for the three developments at Belmore allotments, Maple and Poplar Day Centre and Willow Tree. The employer's agents and appointed architects continue to work on finalising the design of the schemes.

New Build - Appropriation of Land

142. New Build - Appropriation of Land, the £8,635k has been included for New Build appropriation of land for 2 sites at the former Belmore allotments and Maple / Poplar day centre.

New Build - Shared Ownership

143. New Build Shared Ownership - the 2017/18 revised budget is £119k, with a forecast spend of £102k and re-phasing of £17k. The schemes are being delivered concurrently with the General Needs units.

New Build - Supported Housing

144. The Supported Housing Programme comprises the build of 160 mixed client group units across three different sites. The development of 14 Supported Housing units at Acol Crescent has now been removed from the programme as there is no longer a requirement for the units. This has resulted in the forecast cost underspend of £3,675k being reported across the life of the programme, of which £1,768k is declared within the 2017/18 budget.

145. There is an increased re-phasing movement in 2017/18 of £495k compared to Month 8, mainly on the Grassy Meadow site, this re-phasing does not impact on the target completion dates.

HRA General Contingency

146. HRA General Contingency: A capital contingency of £9,270k is included within the HRA capital programme to ensure the Council retains sufficient flexibility to secure additional housing units where opportunities become available.

Works to Stock

147. The Works to Stock revised budget for 2017/18 is £19,964k and the forecast expenditure is £15,446k. The phasing variance is £4,518k, across various work-streams, an increase in the phasing variance of £948k compared to Month 8, due to the validation, procurement and consultation timetables required to deliver these works.
148. The major adaptations budget of £2,334k is forecast to be fully spent.

HRA Capital Receipts

149. There have been 46 Right to Buy sales of Council dwellings as at the end of December 2017 for a total gross sales value of £7.7m and a total of a further 14 sales are forecast to bring the yearly total to 60, totalling £10m in 2017/18.
150. The application of retained Right to Buy receipts is limited by the retention agreement to a maximum 30% of the cost of replacement housing. In the event that expenditure does not meet the criteria, funds would be payable to the DCLG.
151. During 2017/18, the £11,733k receipts generated in 2014/15 could potentially become repayable unless the following expenditure profile is achieved: Q1 £10,527k, Q2 £10,663k, Q3 £10,180k and Q4 £7,740k. Cumulative expenditure on 1 for 1 replacement from previous quarters above the minimum requirement can be carried forward. The cumulative spend requirement has been met for Q1, Q2 and Q3 in 2017/18.

Appendix D - GENERAL FUND CAPITAL PROGRAMME

152. As at Month 9 an underspend of £13,630k is reported on the £63,011k General Fund Capital Programme for 2017/18 due largely to re-phasing of project expenditure. The forecast outturn variance over the life of the 2017/18 to 2021/22 programme is an underspend of £658k.
153. General Fund Capital Receipts of £17,020k are forecast for 2017/18; with a shortfall of £4,851k in total forecast receipts to 2021/22.
154. Overall, Prudential Borrowing required to support the 2017/18 to 2021/22 capital programmes is forecast to be within budget by £4,826k. This is as a result of cost underspends of £658k and increases in grants and contributions of £12,420k due mainly to the confirmed Basic Needs grant allocation for 2019/20 being substantially higher than original budget estimates. However this is partly offset by a forecast combined shortfall of £8,252k in Capital Receipts and Community Infrastructure Levy.

Capital Programme Overview

155. Table 19 below sets out the latest forecast outturn on General Fund capital projects, with project level detail contained in annexes A - D to this report. Forecasts for future years include capital projects and programmes of work approved by Cabinet and Council in February 2017.

Table 19: General Fund Capital Programme Summary

	Revised Budget 2017/18	Forecast 2017/18	Cost Variance Forecast vs Budget	Project Re-phasing	Total Project Budget 2017-2022	Total Project Forecast 2017-2022	Total Project Variance	Movement
	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000
Schools Programme	10,985	8,945	(324)	(1,716)	90,783	90,459	(324)	(99)
Self Financing Developments	150	25	-	(125)	27,619	27,619	-	-
Main Programme	20,300	16,073	(82)	(4,145)	85,537	85,455	(82)	(52)
Programme of Works	30,520	23,282	(252)	(6,986)	84,890	84,638	(252)	(45)
Total Main Programme	61,955	48,325	(658)	(12,972)	288,829	288,171	(658)	(196)
General Contingency	1,056	1,056	-	-	6,524	6,524	-	-
Total Capital Programme	63,011	49,381	(658)	(12,972)	295,353	294,695	(658)	(196)
Movement	343	(2,688)	(196)	(2,835)	343	147	(196)	

156. The revised budget has increased by £343k due to additional schools' contributions to the devolved formula capital programme.
157. The Schools Programme reports a re-phasing under spend in 2017/18 of £1,716k which is mainly due to revised expenditure profiles across financial years of the two primary school expansions that are in progress. Expansions at two Secondary school sites are expected to

commence on site early next financial year following completion of the tendering process. There is an increase in forecast under spend to £324k relating to a combination of unused contingency no longer required for the replacement of Northwood School and lower cost estimates for highways works at Oak Wood School.

158. The five year programme contains two major self financing mixed residential developments at the former Belmore Allotments and Yiewsley pool sites. Consultants are to be appointed shortly to commence feasibility and survey work on the Yiewsley site redevelopment, resulting in forecast re-phasing of £125k. Design work is in progress for the housing development at Belmore Allotments.
159. The main programme reports a small cost under spend of £82k on completion of projects which commenced in the previous financial year. This is a favourable movement of £52k mainly relating to car park resurfacing works. Forecast re-phasing amounts to £4,145k on numerous projects and programmes that will continue into future financial years.
160. Programmes of Works are forecast to have cost under spends of £252k which relates partly to Social Care equipment capitalisation with a favourable movement of £45k on demand for Private Sector Renewal Grants. Forecast re-phasing has increased to £6,986k on various existing programmes that will continue into next year. School Condition works are in various stages of progress and elements of the Transport for London, Corporate Technology and Innovation and Civic Centre programmes will be completed next financial year.
161. The remaining unallocated general contingency budget has reduced to £1,056k in 2017/18, following recent approval of £134k relating to soil remediation works and surfacing works required at Uxbridge Early Years Centre. This is reported under the Environmental and Recreational Initiatives budget. A further £5,468k contingency funding over the period 2018-22 are forecast to be fully utilised as and when risk issues emerge.

Capital Financing - General Fund

162. Table 20 below outlines the latest financing projections for the capital programme, with a favourable medium term variance of £4,826k reported on Prudential Borrowing, due mainly to an increase in grant funding over original budget estimates.

Table 20: General Fund Capital Programme Financing Summary

	Revised Budget 2017/18 £'000	Forecast 2017/18 £'000	Variance £'000	Total Financing Budget 2017-2022 £'000	Total Financing Forecast 2017-2022 £'000	Total Variance £'000	Movement £'000
Council Resource Requirement	42,121	30,330	(11,791)	213,069	199,991	(13,078)	(250)
Financed By:							
Capital Receipts	23,475	17,020	(6,455)	83,393	78,542	(4,851)	(961)
CIL	5,151	3,000	(2,151)	26,901	23,500	(3,401)	-
Prudential Borrowing	13,495	10,310	(3,185)	102,775	97,949	(4,826)	711
Total Council Resources	42,121	30,330	(11,791)	213,069	199,991	(13,078)	(250)

Grants & Contributions	20,890	19,051	(1,839)	82,284	94,704	12,420	54
Total Programme	63,011	49,381	(13,630)	295,353	294,695	(658)	(196)

163. Capital receipts received as at the end of December amount to £780k which will be utilised towards financing costs of transformation in 2017/18. Sales or appropriations on several sites are expected to be completed this financial year to reach the forecast. The five year capital receipts forecast reports an under recovery of £4,851k which is due to a reduction in General Fund share of Right to Buy (RTB) receipts. Forecast RTB sales over the period 2017-22 are 145 lower than original budget estimates.
164. As at the end of December a total of £2,344k Community Infrastructure Levy (CIL) receipts (after administration fees) have been invoiced or received by the Council this financial year, a monthly movement of £1,782k following issue of demand notices on several residential or retail developments. The current year income forecast has increased by £500k as there are other chargeable developments anticipated to proceed this financial year. There are also Section 106 receipts in respect of previous planning applications available for financing existing capital expenditure where in accordance with the specific S106 agreement. Eligible activity exceeds the CIL forecast with spend on Highways investment, community assets through the Chrysalis Programme and other major community infrastructure such as schools meeting the criteria for application of CIL monies.
165. Grants and contributions are £12,420k higher than the revised budget due mainly to the confirmed Basic Needs award for 2019/20 being £11,615k higher than the original budget estimate set before the announcement, although there remain £8,850k in assumed Basic Needs grant for the period 2020-22 that are not yet confirmed. A favourable movement of £54k is reported due to a Section 106 contribution being allocated to finance the existing Chrysalis Programme.
166. A favourable variance of £4,826k is reported on prudential borrowing due mainly to the increase in available grants and contributions noted above, partly offset by the forecast shortfall in other sources of funding. The adverse movement of £711k in month is due to the forecast reduction in General Fund Share of Right to Buy receipts, partially offset by further cost under spends across the capital programme and additional Section 106 contribution.

ANNEX A - Schools Programme

Prior Year Cost	Project	2017/18 Revised Budget	2017/18 Forecast	2017/18 Cost Variance	Proposed Re-phasing	Total Project Budget 2017-2022	Total Project Forecast 2017-2022	Total Project Variance 2017-2022	Project Forecast Financed by:		
									Council Resources	Government Grants	Other Cont'ns
£'000		£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000
	Education and Children Services										
136,966	Primary Schools Expansions	200	100	0	(100)	1,565	1,565	0	1,565	0	0
786	New Primary Schools Expansions	6,461	5,078	0	(1,383)	26,614	26,614	0	12,817	13,797	0
482	Secondary Schools Expansions	1,215	867	0	(348)	55,418	55,418	0	34,483	20,935	0
42,721	Secondary Schools New Build	3,097	2,888	(324)	115	3,574	3,250	(324)	525	2,168	557
187	Hearing Impaired Resource Base (Vyners)	12	12	0	0	12	12	0	12	0	0
0	Additional Temporary Classrooms	0	0	0	0	2,400	2,400	0	2,400	0	0
0	Schools SRP	0	0	0	0	1,200	1,200	0	1,200	0	0
181,142	Total Schools Programme	10,985	8,945	(324)	(1,716)	90,783	90,459	(324)	53,002	36,900	557

ANNEX B - Self Financing Developments

Prior Year Cost	Project	2017/18 Revised Budget	2017/18 Forecast	2017/18 Cost Variance	Proposed Re-phasing	Total Project Budget 2017-2022	Total Project Forecast 2017-2022	Total Project Variance 2017-2022	Project Forecast Financed by:		
									Council Resources	Government Grants	Other Cont'ns
£'000		£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000
	Self Financing Developments										
	Finance, Property and Business Services										
237	Yiewsley Site Development	150	25	0	(125)	23,014	23,014	0	23,014	0	0
0	Belmore Allotments Development	0	0	0	0	4,605	4,605	0	3,397	0	1,208
237	Total Main Programme	150	25	0	(125)	27,619	27,619	0	26,411	0	1,208

ANNEX C - Main Programme

Prior Year Cost	Project	2017/18 Revised Budget £'000	2017/18 Forecast £'000	2017/18 Cost Variance £'000	Proposed Re-phasing £'000	Total Project Budget 2017-22 £000	Total Project Forecast 2017-22 £000	Total Project Variance 2017-22 £000	Project Forecast Financed by:		
									Council Resources £000	Government Grants £000	Other Cont'ns £000
£'000		£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000
	Community, Commerce and Regeneration										
1,702	CCTV Enforcement (SKC's)	40	40	0	0	40	40	0	40	0	0
561	Gateway Hillingdon	2,377	1,400	0	(977)	2,590	2,590	0	2,590	0	0
4,897	Hayes Town Centre Improvements	1,770	1,770	0	0	4,372	4,372	0	342	2,504	1,526
224	Inspiring Shopfronts	397	273	0	(124)	471	471	0	447	0	24
15	Uxbridge Cemetery Gatehouse Chapel	50	20	0	(30)	599	599	0	599	0	0
100	Uxbridge Change of Heart	946	912	0	(34)	1,896	1,896	0	1,071	738	87
	Central Services, Culture and Heritage										
883	Bowls Club Refurbishments	510	350	0	(160)	658	658	0	626	0	32
214	Haste Hill Golf Club	66	66	0	0	66	66	0	66	0	0
32,203	Hillingdon Sports & Leisure Centre	650	50	0	(600)	856	856	0	856	0	0
0	Ruislip Lido Railway Society Workshop	382	340	0	(42)	402	402	0	402	0	0
0	Mobile Library	117	117	0	0	117	117	0	117	0	0
	Finance, Property and Business Services										
2,282	Battle of Britain Heritage Pride Project	3,854	3,854	0	0	4,154	4,154	0	4,154	0	0
29	Battle of Britain Underground Bunker	200	23	0	(177)	1,024	1,024	0	1,024	0	0
0	Bessingby FC and Boxing Clubhouse	180	90	0	(90)	1,370	1,370	0	1,370	0	0
0	Uniter Building Refurbishment	100	10	0	(90)	400	400	0	400	0	0
0	New Museum	100	0	0	(100)	5,632	5,632	0	4,882	0	750
0	New Theatre	100	25	0	(75)	44,000	44,000	0	42,950	0	1,050
0	Youth Provision	1,000	250	0	(750)	3,000	3,000	0	3,000	0	0
0	Hillingdon Outdoor Activity Centre	250	25	0	(225)	250	250	0	250	0	0
	Planning, Transportation and Recycling										
57	Ruislip Lido Car Park Improvements	155	155	0	0	155	155	0	0	155	0
2,279	Cedars & Grainges Car Park	391	250	0	(141)	391	391	0	391	0	0
1,343	Harlington Road Depot Improvements	264	164	0	(100)	314	314	0	314	0	0
0	Purchase of Vehicles	600	250	0	(350)	2,600	2,600	0	2,600	0	0
0	RAGC Car Park	50	20	0	(30)	250	250	0	250	0	0
287	Street Lighting - Invest to Save	4,313	4,313	0	0	5,213	5,213	0	5,213	0	0
	Social Services, Housing, Health and Wellbeing										
0	1 & 2 Merrimans Housing Project	50	0	0	(50)	620	620	0	620	0	0
47	Grassy Meadow Dementia Centre	0	0	0	0	2,465	2,465	0	2,465	0	0
	Cross Cabinet Member Portfolios										
233	Environmental/ Recreational Initiatives	834	834	0	0	1,078	1,078	0	1,023	0	55
9,234	Projects Completing in 2017/18	554	472	(82)	0	554	472	(82)	472	0	0
56,590	Total Main Programme	20,300	16,073	(82)	(4,145)	85,537	85,455	(82)	78,534	3,397	3,524

ANNEX D - Programme of Works

Prior Year Cost	Project	2017/18 Revised Budget	2017/18 Forecast	2017/18 Cost Variance	Forecast Re-phasing	Total Project Budget 2017-2022	Total Project Forecast 2017-2022	Total Project Variance 2017-2022	Project Forecast Financed by:		
									Council Resources	Government Grants	Other Cont'ns
£'000		£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000	£'000
N/A	Leaders Initiative	436	326	0	(110)	1,236	1,236	0	1,236	0	0
	Community, Commerce and Regeneration										
N/A	Chrysalis Programme	1,512	1,257	0	(255)	5,512	5,512	0	5,450	0	62
N/A	Playground Replacement Programme	250	50	0	(200)	1,000	1,000	0	1,000	0	0
	Education and Children Services										
N/A	Formula Devolved Capital to Schools	1,767	1,251	0	(516)	2,940	2,940	0	0	1,935	1,005
N/A	School Condition Building Programme	3,459	1,512	0	(1,947)	6,459	6,459	0	1,908	3,426	1,125
	Finance, Property and Business Services										
N/A	Civic Centre Works Programme	1,610	700	0	(910)	3,610	3,610	0	3,514	0	96
N/A	Corporate Technology and Innovation	671	304	0	(367)	4,527	4,527	0	4,527	0	0
N/A	Property Works Programme	1,089	900	0	(189)	3,009	3,009	0	3,009	0	0
	Planning, Transportation and Recycling										
N/A	Highways Structural Works	7,369	6,831	0	(538)	11,369	11,369	0	11,369	0	0
N/A	Road Safety	150	120	(30)	0	750	720	(30)	720	0	0
N/A	Transport for London	7,923	5,982	(17)	(1,924)	24,702	24,685	(17)	0	24,305	380
	Social Services, Housing, Health and Wellbeing										
N/A	Disabled Facilities Grant	2,707	2,707	0	0	11,907	11,907	0	0	11,907	0
N/A	Adaptations for Adopted Children	17	17	0	0	17	17	0	17	0	0
N/A	PSRG / LPRG	100	55	(45)	0	1,000	955	(45)	955	0	0
N/A	Equipment Capitalisation - Adult Social Care	985	825	(160)	0	4,925	4,765	(160)	0	4,765	0
	Cross Cabinet Member Portfolios										
N/A	Section 106 Projects	112	82	0	(30)	112	112	0	0	0	112
N/A	Equipment Capitalisation - General	363	363	0	0	1,815	1,815	0	1,815	0	0
	Total Programme of Works	30,520	23,282	(252)	(6,986)	84,890	84,638	(252)	35,520	46,338	2,780
N/A	General Contingency	1,056	1,056	0	0	6,524	6,524	0	6,524	0	0
	Total GF Capital Programme	63,011	49,381	(658)	(12,972)	295,353	294,695	(658)	199,991	86,635	8,069

Appendix E – Treasury Management Report as at 31 December 2017

Table 21: Outstanding Deposits - Average Rate of Return on Deposits: 0.42%

	Actual (£m)	Actual (%)	Benchmark (%)
Up to 1 Month	79.0	69.18	55.00
1-2 Months	25.0	21.89	15.00
2-3 Months	0.0	0.00	15.00
3-6 Months	5.0	4.38	10.00
6-9 Months	0.0	0.00	0.00
9-12 Months	5.0	4.38	5.00
12-18 Months	0.0	0.00	0.00
18-24 Months	0.0	0.00	0.00
Subtotal	114.0	99.83	100.00
Unpaid Maturities	0.2	0.17	0.00
Grand Total	114.2	100.00	100.00

167. With the exception of the unpaid Heritable investments, deposits are only held with UK institutions, all of which hold a minimum A- Fitch (or lowest equivalent) long-term credit rating. UK deposits are currently held in AAA rated Money Market Funds, Pooled Funds, Lancashire CC, Northumberland CC, Thurrock Borough Council, Walsall Metropolitan Council, Coventry Building Society, Nationwide Building Society, Goldman Sachs International, Lloyds Bank and Santander UK plc.
168. The Council aims to minimise its exposure to bail-in risk by utilising bail-in exempt instruments and institutions whenever possible. However, due to the significant amount held in instant access facilities needed to manage daily cashflows, it is not possible to fully protect Council funds from bail-in risk. Currently at the end of December, 75% of the Council's total funds have exposure to bail-in risk compared to a December benchmark average of 61% in the Local Authority sector (latest benchmark provided quarterly by the Council's treasury advisors Arlingclose). The Council's exposure reduces to 20% once instant access facilities are removed from the bail-in total.
169. Liquidity was maintained throughout December by placing surplus funds in instant access accounts, and once at capacity, short-term deposits with the DMADF. Deposit maturities were scheduled to match outflows and where required, funds were withdrawn from instant access facilities. As well as the DMADF maturities, there was also a maturing long-term deposit with Stockport Council during the month.

Table 22: Outstanding Debt - Average Interest Rate on Debt: 3.38%

		Actual (£m)	Actual (%)
General Fund	PWLB	47.30	18.72
	Long-Term Market	15.00	5.94
HRA	PWLB	157.32	62.28
	Long-Term Market	33.00	13.06
	Total	252.62	100.00

170. There was one scheduled General Fund PWLB EIP debt repayment of £0.75m this month. Gilt yields ended the month slightly lower that it started, however premiums remained too high to make early repayment of debt feasible. There were no breaches of the Prudential Indicators or non-compliance with the Treasury Management Policy and Practices.
171. In order to maintain liquidity for day-to-day business operations during January, cash balances will be placed in instant access accounts and short-term deposits. Looking forward, opportunities to place longer term deposits will be monitored.

Appendix F – Consultancy and agency assignments over £50k approved under delegated authority

172. The following Agency staff costing over £50k have been approved under delegated powers by the Chief Executive in consultation with the Leader and are reported here for information.

Table 23: Consultancy and agency assignments

Post Title	Original Start Date	Approved From	Proposed End Date	Previous Approval £'000	Approved £'000	Total £'000
Residents Services						
Development Manager (Housing Zone)	12/04/2017	06/01/2018	06/04/2018	93	30	123
Planning Enforcement Officer	03/10/2016	01/01/2018	30/03/2018	80	18	98
Planning Enforcement Officer	06/10/2014	01/01/2018	30/03/2018	264	24	288
Repairs Service Manager	23/11/2015	01/12/2017	02/04/2018	181	27	208
Compliance Officer - Dev & Assets	02/02/2017	29/01/2018	23/04/2018	104	28	132
Project Engineer- (Design)	10/06/2013	08/01/2018	31/03/2018	240	14	254
Technical Manager - Planned Works	24/10/2016	08/01/2018	06/04/2018	123	24	147
Building Control Surveyor	23/08/2012	29/01/2018	29/04/2018	175	9	184
Financial Assessment Officer	20/04/2015	29/01/2018	29/04/2018	88	8	96
Housing Options & Homeless Prevention Mgr	01/01/2017	15/01/2018	08/04/2018	74	28	102
Domestic Abuse Programme Lead	28/08/2017	29/01/2018	11/03/2018	62	16	78
Licensing Officer	03/05/2016	14/02/2018	11/05/2018	65	9	74
Social Care						
Occupational Therapist	01/04/2015	05/02/2018	31/03/2018	194	5	199
Approved Mental Health Worker	12/09/2015	05/02/2018	04/03/2018	172	5	177
Approved Mental Health Worker	29/05/2016	05/02/2018	04/03/2018	121	6	127
Approved Mental Health Worker	01/03/2014	05/02/2018	04/03/2018	222	6	228
Team Manager	26/06/2016	05/02/2018	04/03/2018	115	6	121
Approved Mental Health Worker	01/06/2015	05/02/2018	04/03/2018	189	4	193
Support Worker	04/04/2016	05/02/2018	04/03/2018	52	2	54
Lead Approved Mental Health Practitioner	01/06/2012	05/02/2018	04/03/2018	277	4	281

Post Title	Original Start Date	Approved From	Proposed End Date	Previous Approval £'000	Approved £'000	Total £'000
Senior Social Worker	03/10/2016	05/02/2018	04/03/2018	84	5	89
Occupational Therapist	07/10/2013	05/02/2018	31/03/2018	274	5	279
Senior Social Worker	01/05/2017	05/02/2018	04/03/2018	49	5	54
Occupational Therapist	03/12/2015	05/02/2018	31/03/2018	146	5	151
Occupational Therapist	06/06/2016	05/02/2018	31/03/2018	118	5	123
Social Worker	09/09/2016	05/02/2018	04/03/2018	46	4	50
Residential Care Worker	01/04/2012	05/02/2018	04/03/2018	158	2	160
Social Worker (CHC)	03/01/2017	05/02/2018	31/03/2018	48	3	51
Social Worker	01/04/2013	05/02/2018	30/04/2018	118	6	124
Social Worker	01/04/2013	05/02/2018	30/04/2018	101	6	107
Senior Social Worker	01/04/2013	05/02/2018	30/04/2018	76	6	82
Early Years Practitioner	23/02/2015	05/02/2018	04/03/2018	62	2	64
Early Years Practitioner	24/02/2014	05/02/2018	04/03/2018	61	1	62
Early Years Practitioner	01/05/2015	05/02/2018	04/03/2018	148	2	150
Special Needs Officer	05/01/2015	05/02/2018	31/03/2018	125	7	132
Special Needs Officer	01/12/2016	05/02/2018	31/03/2018	69	5	74
Practice Improvement Practitioner	08/05/2014	05/02/2018	30/04/2018	155	6	161
Child Protection Chair	20/07/2015	05/02/2018	30/04/2018	195	6	201
Child Protection Chair	01/07/2015	05/02/2018	30/04/2018	154	7	161
Social Worker	01/01/2013	05/02/2018	30/04/2018	300	6	306
Senior Social Worker	30/04/2012	05/02/2018	30/04/2018	265	6	271
Senior Social Worker	19/12/2011	05/02/2018	30/04/2018	348	6	354
Social Worker	19/06/2014	05/02/2018	30/04/2018	213	6	219
Social Worker	04/05/2015	05/02/2018	30/04/2018	160	5	165
Social Worker	13/04/2015	05/02/2018	30/04/2018	195	6	201
Social Worker	11/07/2016	05/02/2018	30/04/2018	104	6	110
Social Worker	04/07/2016	05/02/2018	30/04/2018	117	6	123
Social Worker	26/09/2016	05/02/2018	30/04/2018	98	6	104
Social Worker	03/07/2016	05/02/2018	30/04/2018	116	6	122
Social Worker	01/09/2016	05/02/2018	30/04/2018	109	6	115
Social Worker	07/11/2016	05/02/2018	30/04/2018	102	6	108
Social Worker	07/11/2016	05/02/2018	30/04/2018	98	6	104
Social Worker	07/11/2016	05/02/2018	30/04/2018	77	5	82
Social Worker	21/11/2016	05/02/2018	30/04/2018	90	6	96
Senior Social Worker	21/11/2017	05/02/2018	30/04/2018	87	6	93
Social Worker	27/10/2016	05/02/2018	30/04/2018	94	6	100
Social Worker	19/12/2016	05/02/2018	30/04/2018	52	3	55
Social Worker	16/12/2016	05/02/2018	30/04/2018	81	6	87
Senior Social Worker	29/06/2017	05/02/2018	30/04/2018	48	6	54

Post Title	Original Start Date	Approved From	Proposed End Date	Previous Approval £'000	Approved £'000	Total £'000
Social Worker	01/01/2013	05/02/2018	30/04/2018	309	6	315
Team Manager	17/07/2017	05/02/2018	30/04/2018	57	8	65
Social Worker	06/04/2017	05/02/2018	30/04/2018	54	6	60
Team Manager	27/03/2017	05/02/2018	30/04/2018	74	7	81
Educational Psychologist	15/11/2015	05/02/2018	04/03/2018	186	7	193
Educational Psychologist	01/03/2016	05/02/2018	04/03/2018	212	12	224
Educational Psychologist	16/10/2016	05/02/2018	04/02/2018	51	3	54
Educational Psychologist	15/08/2016	05/02/2018	04/03/2018	100	7	107
Social Worker	04/05/2015	05/02/2018	30/04/2018	168	6	174
Placement Officer	18/03/2016	05/02/2018	30/04/2018	86	4	90
Social Worker	26/08/2016	05/02/2018	30/04/2018	93	5	98
Support Worker	20/12/2015	05/02/2018	30/04/2018	52	2	54
Social Worker	05/09/2014	05/02/2018	30/04/2018	268	6	274
Case Progression Manager	07/04/2014	05/02/2018	30/04/2018	347	8	355
Social Worker	11/08/2014	05/02/2018	30/04/2018	274	6	280
Social Worker	01/08/2015	05/02/2018	30/04/2018	144	6	150
Social Worker	28/03/2016	05/02/2018	30/04/2018	120	5	125
Senior Social Worker	05/10/2015	05/02/2018	30/04/2018	117	6	123
Social Worker	21/08/2016	05/02/2018	30/04/2018	108	6	114
Senior Social Worker	06/06/2016	05/02/2018	30/04/2018	72	6	78
Social Worker	13/11/2016	05/02/2018	30/04/2018	89	6	95

STANDARDS AND QUALITY IN EDUCATION IN HILLINGDON 2016/2017

Cabinet Member	Councillor David Simmonds CBE
Cabinet Portfolio	Deputy Leader of the Council Education and Children's Services
Officer Contact(s)	Dan Kennedy, Residents Services
Papers with report	None

HEADLINES

Summary	This report provides the Cabinet with an overview of the standard and quality of education across Hillingdon schools and settings for Hillingdon's children and young people. The report focuses on attainment, progress and achievement for the academic year 2016/17. To support further improvement of standards in Hillingdon the report identifies specific areas for action with schools, settings and partners.
Putting our Residents First	This report supports the following Council objectives of: Our People; and Our Built Environment. Ensuring that every child in Hillingdon has access to a high quality school place is central to putting residents first and is supported by the principles of the Hillingdon School Improvement Plan.
Financial Cost	There are no direct financial implications arising from this report.
Relevant Policy Overview Committee	Children, Young People and Learning Policy Overview Committee
Relevant Ward(s)	All

RECOMMENDATION

That the Cabinet note the key findings set out in the report.

Reasons for recommendation

To provide the Cabinet with an overview of school performance in the Borough which underpins the role of the Local Authority to challenge performance where required.

Alternative options considered / risk management

None.

Policy Overview Committee comments

The Children, Young People and Learning Policy Overview Committee received the Standards and Quality in Education in Hillingdon 2016/17 report on 16 January 2018.

The Committee was pleased with the progress and improvement in education performance across Hillingdon. There was significant improvement highlighted in attainment levels amongst the early years and primary phases and there were positive results in Ofsted's assessment of schools in Hillingdon.

The Committee was mindful that despite the significant improvements, there still remained areas for development including Key Stage 5 performance and the level of reading in the Key Stage 2 provision. The Committee was satisfied that this area was being managed appropriately by officers and it was keen to monitor this progress and development.

Overall, the Committee commended officers for their hard work and encouraged the continuation of good work being undertaken.

SUPPORTING INFORMATION

The main findings from the review of education performance in Hillingdon for the academic year 2016/17 are that:

- Within the early years and primary phases, overall attainment using both the new and the maintained performance measures has risen from 2015/16 with all of the key indicators demonstrating outcomes and progress that are at least as good as and, in some cases, significantly better than national averages. It should be noted that results in some key areas are now in line with or better than London averages which demonstrates significant improvement when compared to previous years.
- Continued improvement is noted in the Early Years' sector which has improved from a historically lower starting point and is now performing well above the national average and in line with London averages.
- Within the primary phase, good outcomes at Key Stage 1 mean that children in Hillingdon are now achieving more strongly than their peers nationally and are increasingly at a similar level to other children in the London region.
- At Key Stage 2, outcomes continue to compare positively with national averages and progress scores in Writing and Maths demonstrating strong outcomes.
- Within the secondary phase, overall attainment using the new performance and progress measures have improved compared to 2015/16 and are now above the national comparators. Key Stage 5 for previous high attainers remains an area for development in the secondary phase.
- Hillingdon's Ofsted inspection data demonstrates an overall improvement in 2016/17 when compared with previous years with 87% of schools judged good or better by the end of the 2016/17 academic year, compared to less than 80% of schools judged Good or Better 2013/14

The remainder of the report provides further information about the outcomes achieved at the different education stages and contains additional appendices and data.

Putting Our Residents First - Raising Standards in Education

- Putting residents first is central to the work of the Council. This includes fulfilling its duty to ensure that its education functions are discharged with a view to promoting high standards; ensuring fair access to opportunity for education and learning, and promoting the fulfilment of learning potential for all learners.
- Within a landscape of significant national change in education the Council continues to recognise that access to the very best education opportunities in high-quality schools and settings will ensure that Hillingdon remains a popular and desirable place of choice for families.

- The Council continues to invest in education, including the expansion of schools where required to meet the rising demand for school places in the primary and secondary sectors. The significant investment by the Council in new and modern education buildings and facilities has and will continue to provide the high quality learning environment that children need in Hillingdon for the best start in life.
- The mixed economy of Council maintained and academy/free schools in the Borough mean that the Council acknowledges its increasingly dynamic role in securing the best outcomes for children and young people educated in the Borough. Working in partnership with autonomous school leaders, multi-academy trusts and other relevant responsible authorities ensures that the Council promotes high standards for all learners, no matter where they are educated.
- The Council accepts that it has an important role to play in promoting high standards for all learners and, in particular, those children, young people and adults vulnerable to underachievement, including those with special educational needs and/or disabilities and those from disadvantaged backgrounds. In order to undertake this role effectively, the Council uses its resources to monitor, support, challenge, and intervene in schools where concerns arise.

It does this by:

- Collating and analysing the performance of all publicly funded schools in Hillingdon to identify those at risk and those in need of additional support or intervention.
- Monitoring and challenging the performance of individual schools for all pupils, specific groups of pupils and individual pupils. This includes reviewing and challenging school improvement plans, providing services to support the positive progress of children and young people, developing and securing expertise in schools and settings, monitoring personal educational plans for children looked after and intervening where schools or settings require improvement.
- Working effectively with services both within the Council and beyond to access support swiftly where concerns are noted or where opportunities for learners are not good enough.
- Undertaking a strategic brokerage role to allow schools in need to access appropriate support from other schools and national organisations.
- Where necessary, exercising formal powers of intervention against maintained schools and / or notifying the Regional Schools Commissioner of concerns in Academy schools in order to drive up standards.
- Working in partnership to build capacity within the schools-led improvement community in Hillingdon.

It is noted that, in the case of academies and free schools, the Council has limited powers to intervene but has, where necessary, referred concerns to the Regional Schools Commissioner and/or the Secretary of State for Education.

Ofsted Inspections of Schools

- During the academic year 2016/17 Ofsted launched the new inspection framework and rolled out the use of the Section 8 'short' (single day) inspection for schools judged to be 'Good' alongside Section 5 full inspections (two days) for schools judged 'Requiring Improvement'.
- During this period 25 schools were inspected in Hillingdon. Of the 25 schools inspected, 6 of these schools demonstrated an improvement in final inspection judgement, moving from 'Requiring Improvement' to 'Good' or 'Good' to 'Outstanding,' whilst 15 retained their previous inspection judgements. 4 schools received a downgraded judgement; 3 are academy schools and the single maintained school is subject to intensive intervention by the Council's School Improvement Team.
- Inspection data for 2015/16 showed that 13% of schools in Hillingdon 'Required Improvement', with 2% in 'Special Measures', and 84% of Hillingdon schools judged 'Good' or better. Inspection data for 2016/17 shows another year of improvement with a reduction in the percentage of schools Requiring Improvement (11%), 2% in 'Special Measures' and agreed for conversion to academy status and 87% of schools judged 'Good' or better at the close of the 2016/17 academic year.
- The positive conversion of six maintained primary schools from Requiring Improvement to Good in 2016/17 was largely responsible for the improvement in standards and ensured that Hillingdon's Ofsted percentages ended the academic year with the overall percentages of schools in each category more closely in line with the England average inspection outcomes than in previous years and with the percentage of schools judged 'Good or Better' above the national percentage at the end of the 2016/17 academic year.
- The two schools judged to be in 'Special Measures' have since been converted to an academy / transferred to a new academy trust. Therefore, they are no longer judged in 'Special Measures', but are subject to considerable scrutiny from Ofsted and the Regional Schools' Commissioner.

Summary of Schools in Hillingdon by Ofsted Judgement

Table 1 - Inspections LBH breakdown

Type of School	No. with current judgement*	% Outstanding	No. Outstanding	% Good	No. Good	% Requiring Improvement	No. Requiring Improvement	% Inadequate	No. Inadequate
Primary	69 (of 72)	18.8	13	72.5	50	7.2	5	1.4	1
Secondary	21 (of 22)	28.6	6	42.8	9	23.8	5	4.8	1
Special	9 (of 10)	33.3	3	55.6	5	11.1	1	0	0
All Schools in Hillingdon	99 (of 104) *new schools without a judgement, includes 1 standalone nursery	22%	22	65%	64	11%	11	2%	2

Type of School	No. with current judgement *	% Outstanding	No. Outstanding	% Good	No. Good	% Requiring Improvement	No. Requiring Improvement	% Inadequate	No. Inadequate
Primary	68 (of 72)	17.7	12	69	47	11.7	8	1.5	1
Secondary	19 (of 22)	26.3	5	52.6	10	15.8	3	5.3	1
Special	9 (of 10)	33.3	3	44.4	4	22.2	2	0	0
All Schools in Hillingdon	96 (of 104) *new schools without a judgement	21.00%	20	63.50%	61	13.50%	13	2.00%	2

Judgement	2016-17		2015-16		2014-15	
	Hillingdon	England	Hillingdon	England	Hillingdon	England
Outstanding	22%	21%	21%	21%	21%	20%
Good	65%	65%	63%	65%	59%	64%
Requires Improvement	11%	13%	13%	13%	19%	14%
Inadequate	2%*	1%	2%	1%	1%	2%
Schools Good or Better	87%	86%	84%	86%	81%	84%

Source: latest Ofsted report 2017 statistics

*In current 2017/18 statistics Hillingdon Inadequate schools is nil / 0% due to conversion

Monitoring and Challenging the Performance of Individual Schools

2016/17 was the second academic year of implementation of the Hillingdon School Improvement Plan (now in its third year and subject to review by the end of the current academic year). This strategic plan, which was developed in partnership with the key education executive groups across the Borough, underwent formal consultation with all schools and was endorsed by Cabinet in December 2015. The plan includes six central elements of monitoring, intervention and challenge within a broader framework of school-led improvement activity. This highly collaborative and school-driven approach ensures that school improvement activity in Hillingdon continues to mirror the national direction for school support and intervention, with a clear emphasis on the brokerage of support for underperforming schools from good and outstanding settings.

This strategic plan includes specific guidance for schools around the responsibilities of the Council with regard to monitoring and intervening where schools are, or may be, at risk of underperformance. This includes processes for the risk assessment of schools who are not securely good or where standards are declining and associated intervention by officers if required to accelerate the use of the Council's formal powers and liaison with the authorities now responsible for academies, free schools and maintained schools in an Ofsted category.

At the end of academic year 2016/17, the Schools At Risk Register identified 15 schools at risk of underperformance in Hillingdon. Of this number, 8 of the schools were maintained by the Council and, accordingly, received intensive monitoring, challenge and support by officers including the brokerage of support from within the local school improvement community to facilitate improvement. In addition and where the schools identified as being at risk were academies/free schools for whom the Local Authority is not the legally responsible body, the Council acted swiftly to highlight concerns to the Regional Schools Commissioner and other relevant authorities.

During 2016/17 it was necessary for the Council to maintain or commence formal intervention action in five maintained schools where education standards were not considered to be improving rapidly enough. This approach resulted in challenge meetings between senior officers and school leaders, intensive brokering of support where required and the use of pre-warning and formal Warning Notices where required. During 2016/17, the positive conversion of 6 schools to a 'Good' judgement has resulted in the overall improvement of the quality of education received by children and young people in Hillingdon.

Having redefined the roles and responsibilities of the Council within a school improvement context during 2015/16, the priority for 2016/17 was for officers to work closely with the school-led Schools' Strategic Partnership Board to implement the new Hillingdon School Improvement Plan. This work led to the joint-delivery of a number of school improvement conferences throughout the year and the launch of a range of school-led improvement initiatives which have been made available to all schools in the Borough, including the development of partnership activities with Brunel University. This approach has ensured that the Council fulfils its duties with regard to acting as a champion of high standards of education for all young people in Hillingdon, whilst continuing to build capacity within the local school-led system and supporting the mixed community of maintained and academy/free schools that constitute the education landscape in Hillingdon.

Overview of School Performance in Hillingdon 2016/17

Please note that along with London and national comparisons, information about rankings refers to Hillingdon's performance against 10 DfE-identified statistical neighbours and, wherever possible, indicates either an upward or downward trend compared with the previous academic year. These neighbours are Coventry, Milton Keynes, Merton, Slough, Hounslow, Redbridge, Ealing, Barnet, Sutton and Reading. It is noted that Ofsted uses comparison with statistical neighbours to compare outcomes across local authorities.

Foundation Stage

Private, Voluntary and Independent (PVI) Childcare Providers - Ofsted Outcomes

- The focus for 2016/18 in the Private, Voluntary and Independent (PVI) sector was to ensure that settings are demonstrating effective quality outcomes on a newly revised Early Years Advisory Team (EYAT) Quality Framework. All PVI settings received the quality framework and, if a setting scored a level 3 or below, a personalised setting action plan was developed.
- The Early Years Team in Hillingdon uses a RAG rating system to prioritise support for settings. The focus for 2016/17 was to support each 'Amber' and 'Red' rated setting in improving three central themes: Assessment and Planning, the Learning Environment and Adult and Child Interactions and Teaching.
- In addition, the team has continued to provide the Continuous Quality Development Group for 'Green' rated settings, which meets at least termly. Settings in this group will be visited by their linked Early Years Advisory Teacher to verify their self-evaluation and completion of the Quality Framework.

The following table demonstrates the percentage of **Hillingdon's PVI Ofsted outcomes** over the past three years in relation to national Ofsted data (published in Oct 2017).

	Summary (Good or better)		Outstanding		Good		Requires Improvement		Inadequate	
	National	LBH	National	LBH	National	LBH	National	LBH	National	LBH
2014/ 2015	83%	88%	15%	12%	68%	76%	15%	12%	2%	0%
2015/ 2016	86%	96%	17%	18%	69%	78%	12%	3%	1%	0%
2016/ 2017	96%	100%	21%	16%	75%	84%	4%	0%	1%	0%

Source: latest Ofsted report 2017 statistics

- Hillingdon has 93 registered day care providers. 82 have a current Ofsted outcome and 11 are still awaiting their first inspection. The support provided to these settings has ensured that, within the Private, Voluntary and Independent (PVI) sector, Ofsted outcomes are significantly above those achieved nationally and are attaining quality improvement.
- It should be noted that there has been a change in inspection framework for this sector and a small number of settings in Hillingdon had their inspection judgement changed from Outstanding to Good.
- During 2016/17 the Early Years Advisory and Childcare Development Team has supported three settings that were rated as Inadequate to move to Good within the six month re-inspection timeframe and one setting which Required Improvement to achieve a Good judgment.
- The support delivered to PVI settings in Hillingdon ensures that children are school ready when they move into statutory education and are best placed to achieve the Good Level of Development at the end of the Early Years Foundation Stage.
- The focus on assessment and planning and the specific tracking of cohort data has highlighted the need for PVIs to be supported to identify trends to ensure that disadvantage and gender gaps do not widen in this sector and establish an inequality pattern for entry to Reception Year in school.

Ofsted Childminder Outcomes

- In order to bring Hillingdon in line with national expectations for child minding, during 2016/17, the Early Years Advisory Team developed and implemented a targeted programme of quality improvement for childminding.

From the table below, it is clear that the quality of childminding in Hillingdon is now above the national outcomes.

	Summary (Good or better)		Outstanding		Good		Requires Improvement		Inadequate	
	National	LBH	National	LBH	National	LBH	National	LBH	National	LBH
2014/ 2015	78%	79%	10%	8%	68%	71%	20%	18%	2%	3%
2015/ 2016	84%	83%	13%	12%	71%	71%	15%	10%	1%	2%
2016/ 2017	93%	97%	15%	13%	78%	84%	6%	3%	1%	0%

Source: latest Ofsted report 2017 statistics

- Overall in Hillingdon there are 215 registered childminders with EYFS children. Of these, 183 are registered childminders with EYFS aged children with a current Ofsted grade and 32 are newly registered childminders awaiting their first inspection.

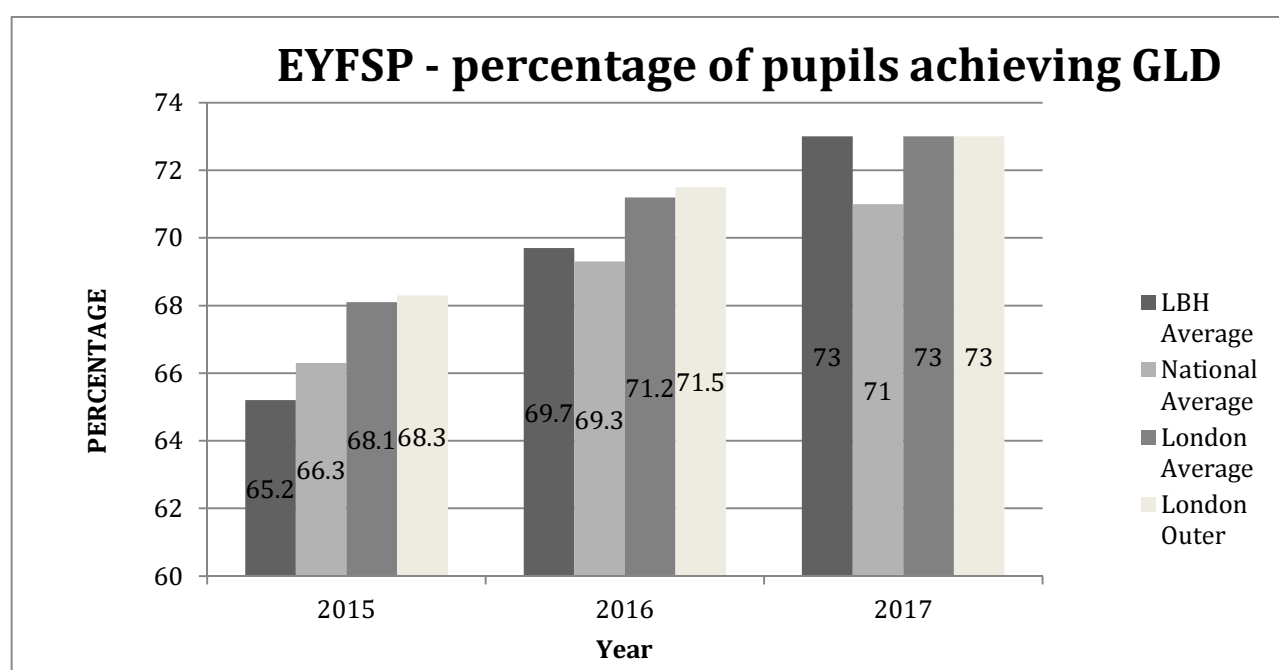
Early Years Foundation Stage Profile Outcomes

Early Years Good Level of Development (GLD) 2016/17

- 2016/17 data demonstrates that the percentage of children achieving the Good Level of Development (GLD) in Hillingdon has improved at a good rate for national, all London and outer London averages. Hillingdon is now above the national percentage and is in line with all London and Outer London benchmarks.
- In 2016/17 and in relation to statistical neighbours, Hillingdon's GLD percentage was ranked 5th of 11, indicating an improving trend.

Table 5: EYFSP	LBH	National	London all	London Outer
2015	65.2%	66.3%	68.1%	68.3%
2016	69.7%	69.3%	71.2%	71.5%
2017	73%	71%	73%	73%
Difference	+3.3	+1.7	+1.8	+1.5

Source - SFR60_2017_Additional_Tables



Source - SFR60_2017_Additional_Tables

Early Years Key Subjects Outcomes 2016/17

- Overall, Hillingdon's performance for the seven key Early Years subjects shows an improvement across all areas. The Borough is now above national outcomes in all of the Early Years areas of learning and development and is broadly in line with the all London outcomes which is a significant improvement in a relatively short space of time. In 2016/17 children in Hillingdon are above those in London in all areas other than Literacy and Mathematics, where the difference is only slight at 0.2% and 0.5% respectively. The results are summarised below in the table in this section of the report.
- In response to 2015/16 data, targeted support from the Council's Early Years Team was directed at improving children's attainment within the Communication and Language and Mathematics areas. It is very positive to note the significant improvement in these key areas in 2016/17.
- Analysis of specific Early Learning Goals (ELGs) in 2016/17 show that Hillingdon has seen an increase in attainment in each ELG with the exception of Reading and Technology, with a slight drop of 0.4% and 0.9% respectively.
- Notably strong performance was seen in Listening, Speaking and Writing; where outcomes are now well above the national and London averages. Performance in the areas of Communication and Language were targeted areas for improvement this year. In 2017 the three ELGs saw an overall 2% increase in Hillingdon, bringing them above national and London outcomes for these ELGs.
- With regard to the ELG for Numbers (within Mathematics), Hillingdon is now above National outcomes but there is a gap of 1.1% and 1.0% compared with all London and Outer London and this will remain a focus area for 2017/18.
- With regard to gender, boys in Hillingdon are now significantly above boys nationally and also above boys in London in all of the prime areas of learning. Most notably boys in Hillingdon are 2.4% higher than national outcomes in Personal, Social and Emotional development. Girls in Hillingdon are above girls nationally and within London in two of the three prime areas, but fall fractionally below London averages in physical development by just 0.1%.
- Hillingdon boys are above national outcomes in Literacy by 4.1% and are 1.7% above national outcomes in Maths. The gap between Hillingdon boys and London boys in Maths has significantly closed from 3.3% to just 0.1% this year. This has positively impacted upon Hillingdon boys' attainment of the Good Level of Development assessment (GLD) with Hillingdon boys now at 3.2% above National and 0.4% above London boys. Similarly in the GLD, Hillingdon girls are above national and in line with London outcomes. In Literacy and Maths, girls in Hillingdon are above national outcomes by 0.9% and 1.2% but fall a little below London averages by 0.9% and 0.5% respectively.
- In 2017 for the GLD, boys in Hillingdon have significantly improved and are now performing above national averages, an increase of 3.2% attainment of the GLD. By comparison,

Hillingdon's girls have only seen a 0.9% increase in attainment of the GLD and this has closed the gender gap in Hillingdon by 4.2% to 11.5%. Nationally the gender attainment gap is 13.7% and in London it is 12.7%.

- When considering children with English as an Additional Language (EAL) the attainment gap has remained stable at a 2% attainment difference between Non-EAL and EAL children. This attainment difference compares positively with the 8% national gap and 6% across all London.
- For children who are in receipt of the Early Years Pupil Premium the attainment gap between them and children ineligible for funding has narrowed by 2% nationally and by 4% in Hillingdon. In 2016/17 the gap in attainment in Hillingdon was 15% compared to 17% nationally. The gap in London is 11% and, therefore, narrowing the gap between disadvantaged children in the Early Years and their non-disadvantaged peers will continue to be a focus for support and development in 2017/18.

The following table summarises the performance across the seven key Early Years subjects. The figures in brackets denote the progress made from the year 2016 to 2017.

Table 6: EYFSP Subject	Hillingdon			National			London		
	2015	2016	2017	2015	2016	2017	2015	2016	2017
Communication & Language	79	82 (+3)	84 (+2)	80	81.5 (+1.5)	82.1 (+0.6)	81	82 (+1)	82.6 (+0.6)
Physical Development	87	87 (-)	88.4 (+1.4)	87	87.5 (+0.5)	87.5 (-)	88	88(-)	88.2 (+0.2)
Personal Social & Emotional Development	82	85 (+3)	86.7 (+1.7)	84	85 (+1)	85.2 (+0.2)	85	85 (-)	85.7 (+0.7)
Literacy	72	73.5 (+1.5)	75.2 (+1.7)	70	72 (+2)	72.8 (+0.8)	73	74.5 (+1.5)	75.3 (+0.8)
Mathematics	76	76.5 (+0.5)	79.2 (+2.7)	76	77.5 (+1.5)	77.9 (+2.4)	78	79 (+1)	79.7 (+0.7)
Understanding the World	81	82.5 (+1.5)	84.2 (+1.7)	82	83 (+1)	83.6 (+0.6)	83	83.5 (+0.5)	83.8 (+0.3)
Arts/Design & Making	87	87.5 (+0.5)	88.9 (+1.4)	85	86.5 (+1.5)	86.7 (+0.2)	87	87.5 (+0.5)	87.8 (+0.3)

Source - SFR60_2017_Tables Figures shown are percentages

Priorities for Development:

- To continue to support teachers in making secure and consistent judgments against national standards through rigorous moderation, targeted support, and centralised training.
- For 2017/18 onwards a focus on Mathematics will be a priority in order to match, as a minimum, London outcomes and to support the continued rise in attainment of the Good Level of Development.
- To continue to support all Early Years settings in providing effective and appropriate interventions based on learning needs for children eligible for the Early Years Pupil Premium and to continue to narrow the disadvantage gap.
- To support teachers in being responsive to the learning needs of boys and girls to ensure that all children are making progress and that the gender attainment gap continues to narrow.
- To support the childminding sector to raise standards and quality in care and education, particularly in light of the introduction of the 30 hours of free entitlement to working parents and their role in supporting parents' flexible access to this.
- To provide detailed advice, support and training on the teaching of Mathematics (especially numbers) and Reading.
- To raise attainment to at least London levels.
- To ensure that PVI settings are up-skilled in effective teaching of the Prime Areas of Learning and the core subjects of Maths and Literacy to ensure that children who access their 30 hours in day-care are making appropriate progress to begin Reception Year at the level needed to attain their GLD and to maintain the pace of GLD improvement across Hillingdon.
- To support those Private, Voluntary and Independent (PVI) settings and registered childminders that have reached a 'Good' Ofsted judgement to work towards Outstanding to raise the percentage of outstanding provision in Hillingdon to above national levels.
- To continue to provide Reception Year teachers with moderation events to ensure consistency and accuracy of final judgments of the EYFS areas of learning and development and to support year teachers in changes to School Readiness Baseline tests.
- To continue to support the Council in developing sufficient places to provide funded two year places in order to ensure all children in Hillingdon have the best start and are school ready.
- To support the local authority in developing sufficient extended 15 hour places for eligible families within the 30 hour offer.

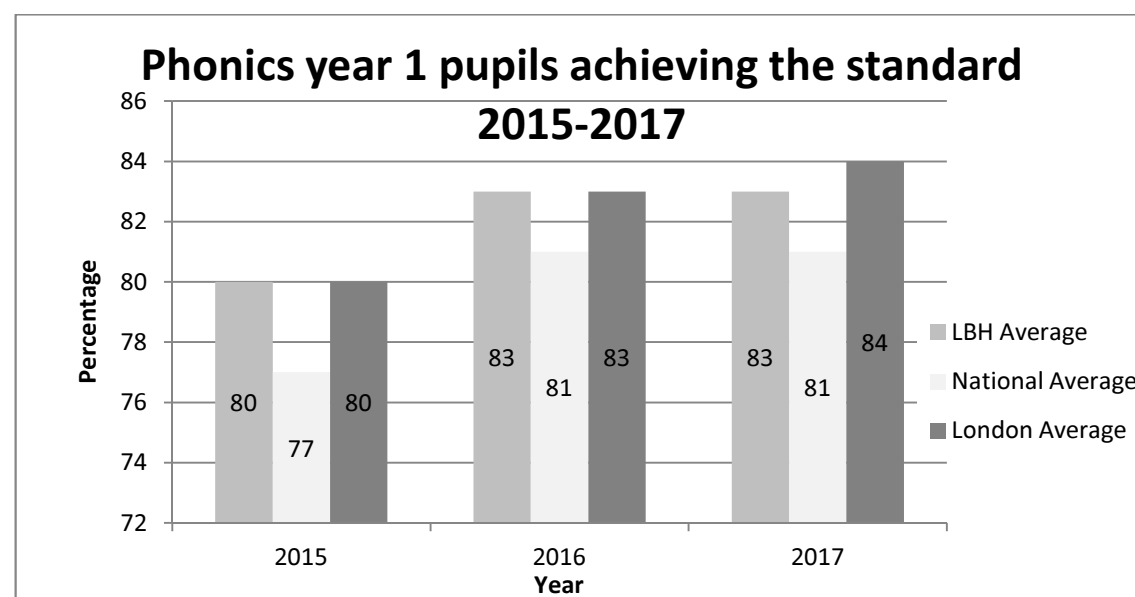
Key Stage 1

Phonics Outcomes in Hillingdon - Percentage of pupils achieving expected standard

- In Phonics in 2016/17, once again a greater proportion of Hillingdon's children achieved the expected standard than their peers nationally. It is noted that this figure remained static this year at Year 1 and, therefore, fell slightly below the London average for the first time. However, overall Phonics achievement by end of Year 2 outperformed national and London, indicating that more children in Hillingdon have the key phonetic skills to support growing literacy than their peers across the country by the end of Key Stage 1.
- In 2016/17, in relation to our statistical neighbours Hillingdon's Phonics percentage is now ranked 3rd of 11, indicating an improving trend.

Table 7: Phonics % Achieved Standard	Region	2015	2016	2017
Year 1	Hillingdon	80	83 (+3)	83 (-)
	National	77	81 (+4)	81 (-)
	London	80	83 (+3)	84 (+1)
Cumulative by the end of Year 2	Hillingdon	91	91 (-)	93 (+2)
	National	90	91 (+1)	92 (+1)
	London	91	92 (+1)	92 (-)

Source - Statistical First Release SFR49_2017_LA_table Note - the difference in annual performance is shown in brackets. Figures shown are percentages.



Source - Statistical First Release SFR49_2017_LA_tables. Note - Figures shown are percentages.

Key Stage 1 Outcomes in Hillingdon:

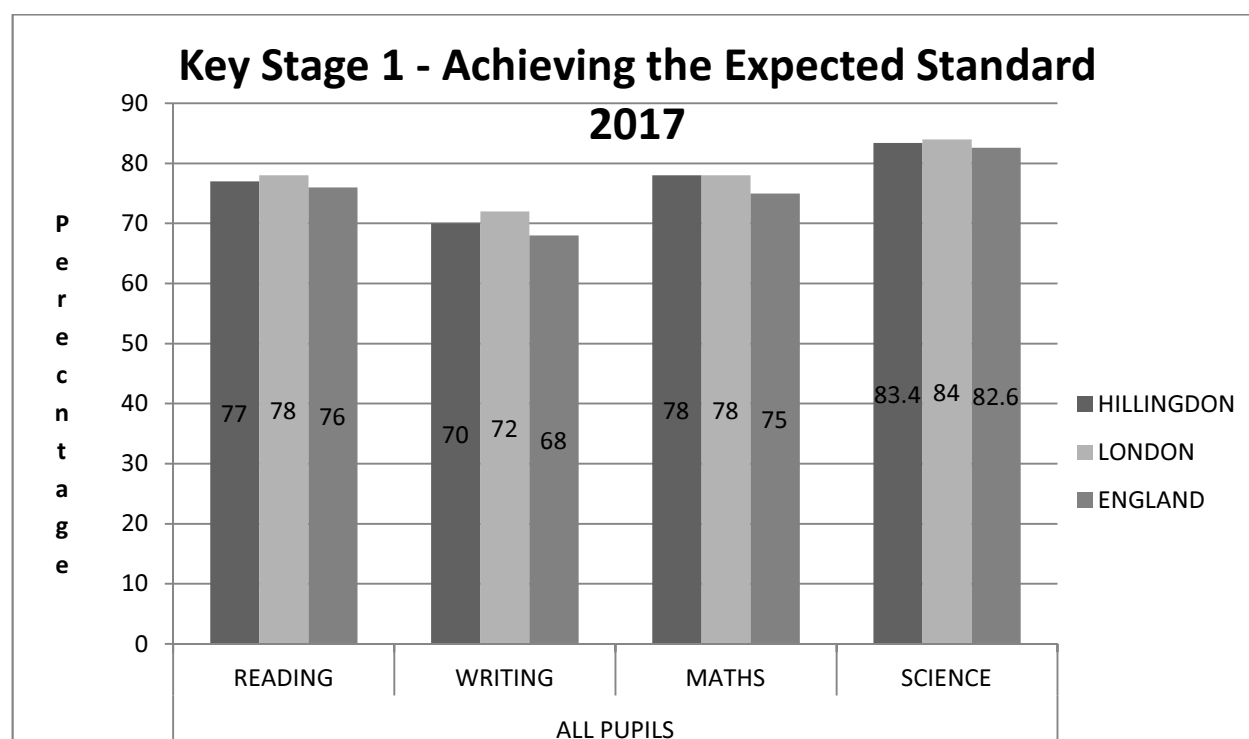
In 2016/17, by the end of Key Stage 1 pupils are expected to reach the national expected standard in Reading, Writing and Maths and to achieve the expected standard in Phonics.

- Overall outcomes at Key Stage 1 show that more children in Hillingdon achieved the expected standard for each key area and for the combined result than the national average.
- In Maths, Hillingdon children achieved in line with London averages but this is not yet the case in literacy. Outcomes at the higher standard for the combined result (Reading, Writing and Maths) are now securely above the national average for each individual area and for the combined result which is a significant improvement on previous years and demonstrates that Key Stage 1 provision in Hillingdon is now providing more appropriate stretch and challenge for more able pupils.
- Detailed analysis of Key Stage 1 outcomes shows that children with English as an Additional Language achieve particularly well in Hillingdon but that those children whose first language is English and those of Black Caribbean heritage perform less strongly as do those disadvantaged or vulnerable. This area should remain a key area of focus for schools in Hillingdon during 2017/18 and beyond.
- In addition, it is noted that whilst overall progress from the Early Years Foundation Stage (EYFS) to end of Key Stage 1 for children in Hillingdon compared to their peers with similar prior attainment nationally has improved and is significantly stronger than in previous years, the progress of disadvantaged pupils with SEND remains an area for further development and is particularly the case for those children from White British backgrounds.
- For 2016/17, Hillingdon's KS1 Reading at the Expected Standard is ranked 6th of 11 which is an improvement compared to the previous year.
- For 2016/17, Hillingdon's KS1 Writing at the Expected Standard is ranked 6th of 11 which remains in line with the previous year.
- For 2016/17, Hillingdon's KS1 Maths at the Expected Standard is ranked 5th of 11 which remains in line with the previous year.

Table 8: Key Stage 1 %		HILLINGDON		NATIONAL		LONDON	
SUBJECT	LEVEL	2016	2017	2016	2017	2016	2017
READING	EXPECTED	75	77 (+2)	74	76 (+2)	77	78 (+1)
	HIGHER	23	27 (+4)	24	25 (+1)	26	27 (+1)
WRITING	EXPECTED	66	70 (+4)	65	68 (+3)	70	72 (+2)
	HIGHER	13	18 (+5)	13	16 (+3)	17	18 (+1)
MATHS	EXPECTED	75	78 (+3)	73	75 (+2)	77	78 (+1)
	HIGHER	19	24 (+5)	18	21 (+3)	22	24 (+2)
RWM*	EXPECTED	61.8	65.1 (+3.3)	60.3	63.7 (+3.4)	Not available yet	Not available yet
	HIGHER	8.4	12.4 (+4)	8.9	11 (+2.1)	Not available yet	Not available yet

Source - SFR49_2017_LATables_KS1 (nb does not cover RWM combined)

*Reading, Writing and Maths. Pupils must pass all three subjects to attain this pass



Source - SFR49_2017_LATables_KS1 (nb does not cover RWM combined)

*Reading, Writing and Maths. Pupils must pass all three subjects to attain this pass

Key Stage 2

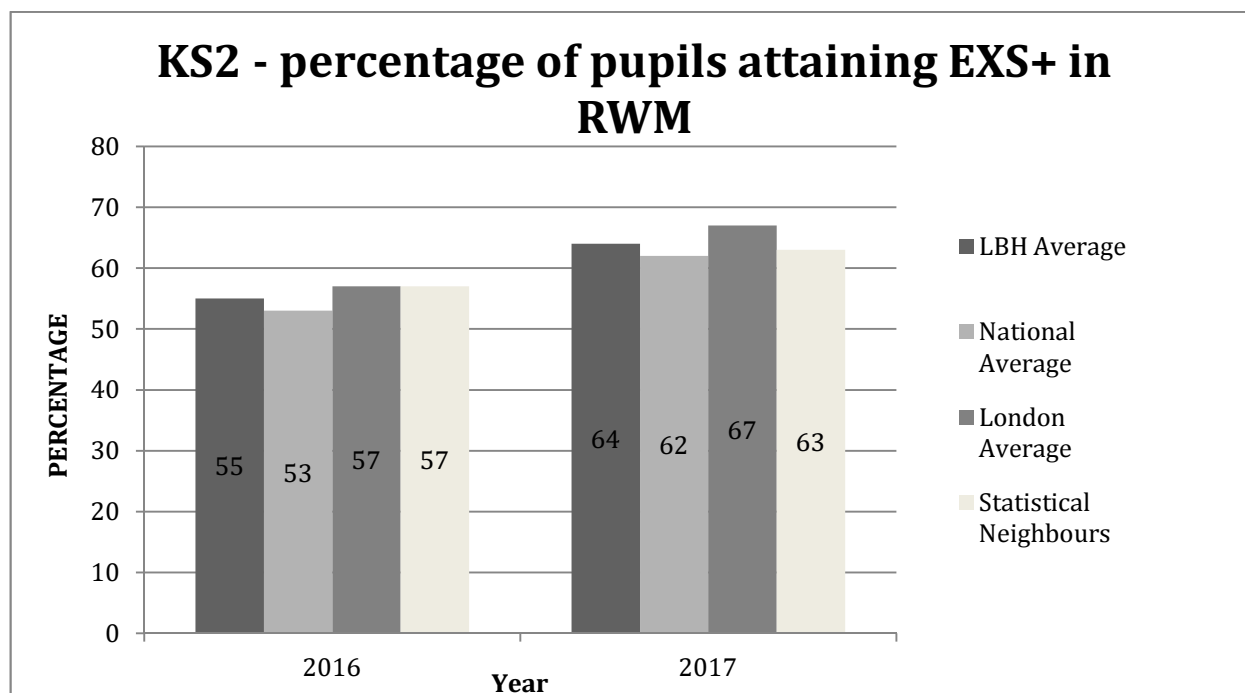
Key Stage 2 Outcomes and Progress in Hillingdon:

- Overall results for Hillingdon's children at Key Stage 2 in 2016/17 were broadly positive, with the Borough performing strongly against national averages for the majority of key measures and for the combined Reading, Writing and Maths outcome.
- Particularly pleasing attainment is noted in Maths and Grammar, Punctuation and Spelling at the Expected Standard, where Hillingdon pupils were above both national and London-wide averages.
- Positive improvement is also noted in Writing which had been a previous area of concern at Key Stage 2 and which demonstrates increased teacher confidence in the new assessment system and the impact of the Council's assessment and moderation improvement focus in 2016/17.
- The achievement of children at the Higher Standard is less consistent than in previous years with some assessment areas exceeding or in line with national averages whilst others are not as strong as in previous years. The focus on consistently strong rates of progress and attainment for children capable of achieving the Higher Standard should remain a key focus in this phase.
- Whilst Hillingdon's combined assessment for Reading, Writing and Maths in 2016/17 remained above the national average, it is noted that underachievement in the Reading element in 2016/17 for some schools impacted upon overall Borough outcomes in this area. The Council's School Improvement Team is working closely with these schools to improve the quality of Reading in those settings.
- In addition to attainment data, new progress measures were introduced for schools in 2015/16 and can now be compared to 2016/17 results. Data shows that Hillingdon's overall progress measures from Key Stage 1 to Key Stage 2 in 2016/17 were positive in both Writing and Maths but fell slightly below the national average in Reading. The overall progress measure for the combined assessment in Hillingdon continues to compare well against the national score, demonstrating that schools in Hillingdon are, overall, continuing to add positive value to learners during Key Stage 2 education.
- Detailed analysis of Key Stage 2 outcomes and progress show that children with English as an Additional Language achieve particularly well in Hillingdon but that those children whose first language is English and those of Black Caribbean heritage perform less strongly as do those disadvantaged or vulnerable including those with SEND. This area should remain a key area of focus for schools in Hillingdon during 2017/18 and beyond.
- In addition, it is noted that boys tended to make more progress than girls at Key Stage 2 and that this difference is particularly noted in the Reading element.

- For 2016/17, Hillingdon's combined Reading, Writing and Maths at the Expected Standard is ranked 7th of 11; previously 5th, which reflects the underperformance in Reading in 2017 for some schools in the Borough.

Table 9: Key Stage 2		HILLINGDON		NATIONAL		LONDON	
SUBJECT	LEVEL	2016	2017	2016	2017	2016	2017
READING	EXPECTED	70	72 (+2)	66	72 (+6)	69	75 (+6)
	HIGHER	19	24 (+5)	19	25 (+6)	21	27 (+6)
	AVERAGE SCALED SCORE	103	104 (+1)	103	104 (+1)	103	105 (+2)
WRITING TA	EXPECTED	72	78 (+6)	74	77 (+3)	76	81 (+5)
	HIGHER	16	18 (+2)	15	18 (+3)	17	21 (+4)
MATHS	EXPECTED	76	80 (+4)	70	75 (+5)	77	81 (+4)
	HIGHER	24	29 (+5)	17	23 (+6)	23	30 (+7)
	AVERAGE SCALED SCORE	105	106 (+1)	103	104 (+1)	104	106 (+2)
GPS	EXPECTED	80	83 (+3)	73	78 (+5)	79	83 (+4)
	HIGHER	31	40 (+9)	23	31 (+8)	29	40 (+11)
	AVERAGE SCALED SCORE	106	108 (+2)	104	106 (+2)	105	108 (+3)
RWM (Combined Result)	EXPECTED	55	64 (+9)	53	62 (+9)	57	67 (+10)
	HIGHER	7	10 (+3)	5	9 (+4)	7	11 (+4)

Source - SFR43_KS2_Tables_2017_Revised. Apart from Scaled Scores the figures shown are percentages.



Source - SFR43_KS2_Tables_2017_Revised. Apart from Scaled Scores the figures shown are percentages. NB – 2017 figure for statistical neighbours is provisional.

Key Stage 1 to 2 Progress Levels 2016 and 2017

Key Stage 1 to 2 Progress levels	READING		WRITING		MATHS	
	2016	2017	2016	2017	2016	2017
	+0.3	-0.3	+0.1	+0.2	+1.3	+1

Source - ASP

Priorities for Key Stages 1 & 2

- Focus on accelerating outcomes for more able children in Key Stage 1 and particularly for those at risk of underachievement, including those disadvantaged and / or with special educational needs and/or disabilities.
- Promote better achievement and progress for key groups of children including those of Black Caribbean heritage, White British learners from disadvantaged backgrounds and those with SEND.
- Focus on closing gender gaps in literacy achievement overall and, particularly, in Reading.
- Work with schools to ensure that the percentages of children attaining the higher standard is consistent across the key areas in Hillingdon and matches London averages.

- Use the primary progress measures alongside attainment data to target school improvement resources, challenging the performance of schools whose progress scores are not yet in line with national averages for each key area and ensuring that governing bodies understand the significance of progress data for whole cohorts and individual groups.
- Provide targeted literacy intervention and support for schools whose Reading outcomes were less positive in 2016/17.
- Work closely with local Teaching Schools and other national and local providers to develop a strong partnership support and development offer for schools to access in order to ensure that standards in Hillingdon continue to rise and that improved outcomes over the past three years are maintained in the landscape of local and national school improvement change.

Key Stage 4

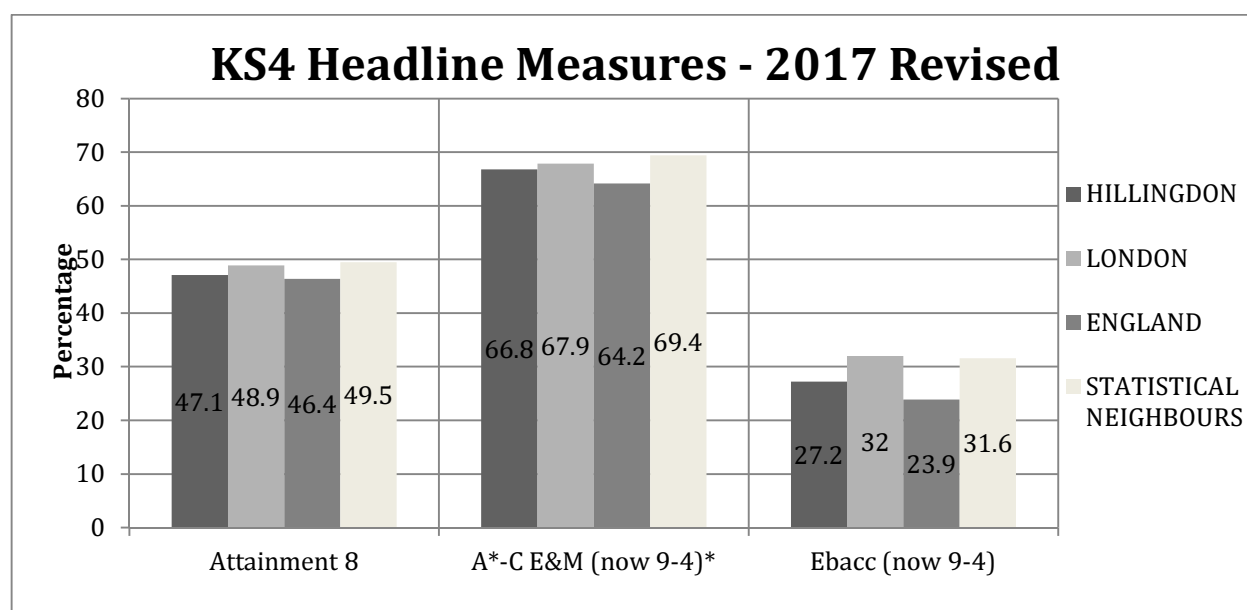
Key Stage 4 Outcomes in Hillingdon: Percentage of overall results including 2015/16 comparators where available and new performance measures for progress and attainment

- Since 2013/14, significant national reforms to Key Stage 4 curricula, entry policy and assessment criteria have been underway. This means that year-on-year data comparison is a less accurate method of measuring relative improvement or decline. For 2016/17, secondary schools report against the national Progress 8 measure for all schools which is calculated using the Attainment 8 scores of individual pupils; the standard and strong pass system within the new 9 - 1 grades system for core subjects and the English Baccalaureate (Ebacc) measure.
- Whilst previous A* - C inc English and Maths (previously known as the Basics measure) is no longer an official measure of Key Stage 4 performance the new 9 - 4 including English and Maths is broadly comparable. This measure indicates that Hillingdon secondary schools are again comfortably above the national averages for standard passes, although performance is less positive at the strong pass level.
- Overall Ebacc outcomes in Hillingdon's secondary schools continue to compare positively with the national average for this measure although this measure remains significantly below the London average.
- The overall 'Progress 8' score for the secondary sector in Hillingdon is encouraging and compares well to both the national and London scores indicating that, on average, Hillingdon secondary schools are adding more value to their students than other secondary schools nationally.
- 'Attainment 8' scores per pupil show that young people in Hillingdon attained results in 2016/17 that were, on average, broadly in line with their peers nationally at Key Stage 4.

- Detailed analysis of Key Stage 4 outcomes shows that children with English as an Additional Language achieve particularly well in Hillingdon and that girls also achieve well but that those children whose first language is English and those of Black Caribbean heritage perform less strongly as do those disadvantaged or vulnerable. This area should remain a key area of focus for all schools in Hillingdon during 2017/18.
- In addition, it is noted that overall progress in some subjects are areas of development including languages, Information Technology and Design and Technology subjects.
- In relation to our statistical neighbours Hillingdon is ranked 8th of 11 for standard passes in English and Maths (9 to 4) and 9th of 11 for strong passes in English and Maths (9 to 5 - strong).
- In relation to our statistical neighbours Hillingdon is ranked 9th of 11 for passes in EBacc (for both 9 to 4 and 9 to 5).
- In relation to our statistical neighbours Hillingdon is ranked 8th of 11 for Average Progress 8 score.
- For young people vulnerable to underachievement including those with special educational needs and/or disabilities, detailed analysis of provisional data suggests that the gaps between these groups and their non-vulnerable peers across the performance measures widen into Key Stage 4 in Hillingdon and are, on average, larger than the gaps between these groups nationally.

Table 10: Key Stage 4 SUBJECT	Hillingdon			National			London		
	2015	2016	2017	2015	2016	2017	2015	2016	2017
New from 2017: 9 to 4 pass in English and Maths*	59.5	65.3	66.8 (+1.5)	59.5	63.3	64.2 (+0.9)	62.5	66.4	67.9 (+1.5)
NEW from 2017: 9 to 5 (strong) pass in English and Maths	-	-	45.3	-	-	42.9	-	-	48.2
New from 2017 = % EBacc 9-4 PASS	26.2	25.9	27.2 (+1.3)	24.4	24.6	23.9 (-0.7)	30.5	31.6	32 (+0.4)
NEW from 2017 % EBacc 9-5 Strong pass	-	-	24	-	-	21.4	-	-	28.8
Average Progress 8 score	N/A	0.07	0.14 (+0.07)	N/A	-0.03	-0.03 (-)	N/A	0.16	0.22 (+0.06)
Average attainment 8 score per pupil	N/A	51.1	47.1 (-4)	N/A	49.9	46.4 (-3.5)	N/A	51.7	48.9 (-2.8)

Prior to 2017 this was the equivalent of GCSE A-C in English and Maths.
Source – SFR01 2017 LA Tables (Revised 25/01/2018)



Prior to 2017 this was the equivalent of GCSE A-C in English and Maths. EBacc 9 – 4 includes passes in English and Maths.

Source – SFR01 2017 LA Tables (Revised 25/01/2018)

Priorities for Key Stage 4

- Supporting the two remaining LA Secondary Schools for which the LA retains responsibility with a particular focus on progress scores for vulnerable or disadvantaged groups.
- Working with the wider secondary school sector, via established partnership groups, to address variations in progress scores, for all young people and, particularly, for those most at risk of underachievement including young people with SEND and their disadvantaged peers through the Council's links with the Schools' Strategic Partnership Board and Hillingdon Association of Secondary Heads. This will include utilising appropriate challenge and support mechanisms and escalating concerns of unacceptable underperformance, where necessary, to the relevant responsible bodies. This includes the Regional Schools Commissioner and / or the Secretary of State for Education where improvements are not being expedited.

Key Stage 5

Key Stage 5 Outcomes in Hillingdon

- Hillingdon schools show slightly improved performance at APS per entry and for overall percentages at the higher grades at A Level when compared to 2015/16 but remains below the national and London average attainment levels.
- Of note is the lower proportion of Hillingdon students achieving the highest grades at 'A' level, when compared with the London and national figures. Hillingdon students attaining these grades are also less likely to be attaining them in 'facilitating' subjects at 'A' level i.e. those subjects recommended by Russell Group universities as most likely to lead to the widest range of options for degree level study.

Table 11: Key Stage 5	Level 3 Students*			A Level Students								
	APS** Per Entry			APS** Per Entry			Percentage of Students achieving Grades AAB or better at A Level			Percentage of students achieving Grades AAB or better at A Level, of which at least 2 are in facilitating subjects.		
	2016	2017	Diff.	2016	2017	Diff.	2016	2017	Diff.	2016	2017	Diff.
England – state sector	32.1	33.23	1.13	30.84	32.39	1.55	19.9	22.4	2.5	15.6	17	+1.4
London	32.53	33.62	1.09	31.42	32.39	0.97	20.2	22.2	2	16.4	17.6	1.2
Hillingdon	29.9	31.04	1.14	28.33	29.34	1.01	13.5	15.9	2.4	10.4	9.9	-0.5

Source = SFR03_2017_LA Tables (Revised 25/01/2018)

* Level 3 is for students studying applied general and technical level qualifications

**APS = Average Points Score

Priorities for Key Stage 5

- To build on the links made with post-16 providers, in order to analyse performance and challenge underperformance to improve outcomes at Key Stage 5.
- To monitor the impact of the work of the Hillingdon Association of Secondary Head Teachers in improving outcomes for previous high attainers in Hillingdon's school-based Key Stage 5 provision

Children Looked After (CLA)

Children Looked After Attainment and Progress Summary

Although outcomes for Hillingdon CLA who have been in continuous care for 12 months or more fluctuate year on year and are highly dependent on the makeup of the cohort, progress over time has been evident particularly at KS4 with a rise in CLA achieving the old headline measure of 5 A*-C including English and maths from 7% in 2014 to 20% in 2017.

This said, it is important to reflect that in the case of the year 11 cohort those who contribute to the national statistics are only 60 percent of the total cohort within that year group. The remaining young people, a large percentage of which are Unaccompanied Asylum Seeking Children (UASC), still need to be supported and in many cases are the most challenging with no education provision in place at the point they enter the care system for some.

The eligible Year 6 cohort that contributes to the national indicators for attainment at the end of Key Stage 2 (KS2) consisted of 7 CLA. The attainment of the cohort in relation to those who obtained age related expectation or above in reading, writing, spelling, punctuation and grammar and maths at the end of KS2 was 43%, 57%, 29% and 43% respectively exceeding or meeting the target of 29%, 14%, 14% and 43%. 43% of the cohort achieved expected attainment in reading, writing and maths with none achieving at a higher standard across the 3 subjects.

The national comparisons for CLA for 2016 are yet to be released, but to provide a benchmark, 25% of CLA reached the new expected standard or above in the headline measure reading, writing and mathematics in 2016.

In relation to progress the Virtual School recorded Reading progress of -1.14, Writing progress of +5.14 and Maths progress of +0.14, based on the mean average of its KS2 CLA progress scores in the respective subject. Given the lower confidence interval limit is higher than zero at 0.66 in writing, our Virtual School Progress 8 Writing score of +5.14 is above average and the result is statistically significant.

- Attainment at the end of Key Stage 4 showed Hillingdon's eligible CLA exceeding Hillingdon's target of 7% with 20% achieving 9 - 4 including English and Maths plus 3 other subjects at A* - C, 2 and 6 percentage points above Hillingdon's CLA and CLA nationally in 2016 respectively. These results are a considerable achievement and success when taking into account the needs of the children. The cohort size was 25, with 7 (28%) entering care (the country) during KS4. 6 of the 25 (24%) were not sitting GCSE's and hence although part of the cohort would not be able to contribute positively to the overall results for the year.
- By way of context, 11 (44%) are UASC and have English as an additional language. 10 (40%) have SEN including 7 (28%) who have a statement or EHCP and 3 (12%) have received Educational Psychology (EP)/MAPS input since entering care. 56% of the cohort are with foster carers or living with parents with the remainder in residential placements or semi independent living. 56% attend mainstream schools, with the remaining 44% in Pupil Referral Units (PRU's), alternative provisions, non independent and independent special schools. 12 (48%) had placement changes in KS4, with 6 resulting in a change of school.

For the 19 sitting GCSE qualifications they recorded an average attainment 8 score of 28.53 (this is above the 2016 national CLA comparison of 22.8).

- The information below outlines KS4 achievement in 2017 against the new headline measure for this cohort of 25 CLA, these are benchmarked against available 2016 national CLA statistics in bold.
 - % achieving level 4 -9 in English (language or literature) and maths: 7/25 (28%), **(17.5%)**
 - % achieving level 5-9 in English (language or literature) and maths: 3/25 (12%)
 - % achieving the EBacc level 4 -9: 0/25 (0%), **(2.8%)**
 - % achieving the EBacc level 5 -9: 0/25 (0%)
 - % pupils entered for EBacc: 2/25 (8%), **(8.2%)**
 - % of students staying in education or employment after key stage 4: 22/25 (88%)

Children Looked After- Key Stage 4	Number of Pupils	Hillingdon
		2017
New from 2017: 9 to 4 pass in English and Maths*	7 from 25	28
NEW from 2017: 9 to 5 (strong) pass in English and Maths	3 from 25	12
New from 2017 = % EBacc 9-4 PASS	0 from 25	0
NEW from 2017 % EBacc 9-5 Strong pass	0 from 25	0
Percentage of pupils entered for EBacc	2 from 25	8
Percentage of students staying in education or employment after Key Stage 4	22 from 25	88

Source - CLA Key Stage 4 2017. Figures shown are percentages. Not comparable with 2016.

CLA Key Stage 2 Pupils 2017	READING	WRITING	GPS	MATHS	RWM*
2017 Actual	43	57	29	43	43
2017 CLA service target	29	14	43	43	-

CLA Key Stage 2 2017 – Figures shown are percentages.

*Reading, Writing & Maths Combined (pupils must achieve all 3 elements)

Placing CLA in appropriate education provision continues to provide challenge, particularly in KS4 and for unaccompanied asylum seeking children. However, a good working relationship with Hillingdon schools has meant that admission of CLA is improving, without the need to challenge. In the last year we have been required on two occasions to serve schools with intention to direct notification and this has been a sufficient measure to reverse their decision and offer a place.

Clearly, the Council would wish to avoid this process as it extends the length of time the young person is out of school and as a service the Council will continue to strengthen communication with our schools and ensure the admission of CLA is supported in a timely fashion.

Priorities for Children Looked After in Hillingdon

- To continue to maximise progress and close the attainment gap for Children Looked After and Care Leavers by informed use of data and targeted support, particularly at KS1, KS2, KS4 and KS5.
- To improve baseline assessments for UASC in order to better gauge progress from point of school entry.
- To improve the average attendance of Hillingdon statutory school age CLA, reduce unauthorised absence and persistent absenteeism through closer working with foster carers, social care colleagues and schools.
- To reduce the number of fixed term exclusions and school days lost as a result of exclusion.
- To further strengthen the systems and processes in place to analyse and assess the impact of pupil premium spend on outcomes for Hillingdon statutory school age CLA and to support schools to evidence impact of spend and for Virtual School Officers to continue to hold schools to account for funding released.
- To further strengthen the relationship and collaborative working with colleagues in SEND, inclusion and multi sensory teams and seek out further opportunities to support CLA with SEND and build up the resources to help them engage with learning.
- To build on and strengthen the collaborative working with social care to further reduce school changes, particularly as a result of care placement breakdown through direct training.
- To improve the understanding of school staff on the impact of attachment disorder on learning for CLA, through dissemination of training and observational work.
- To strengthen transitions from KS4 to KS5 and KS5 to leaving care and to develop a better understanding of educational needs post 18 in order support Higher Education access and provide appropriate information, advice and guidance.

- To reduce Not in Education, Employment or Training (NEET) figures even further for 16-18 year old Hillingdon CLA through Personal Education Plans (PEPs), NEET working group establishment, NEET panel attendance and focused support.

Special Education Needs and/or Disabilities (SEND)

- Since 2013/14, Hillingdon, along with all Local Authorities across the country, has been working with schools to manage the transition to the new SEN Code of Practice. A key element of this work has been focused on the replacement of the SEN Statement with the Education, Health and Care Plan (EHCP) and the categorisation of all other children and young people with SEND as SEN Support. When interpreting data for children and young people with SEND it should be noted that progress from year to year will always depend on the specific needs of individual children and the marked variations in cohort profile.
- Local authorities are required to convert all SEN Statements to Education Health and Care Plans (EHCP) by 31/03/18, locally there is a plan in place to complete all of the conversions within the agreed timeframe.
- The Council's early intervention, prevention and special educational needs services (which includes the Early Support Team, the Inclusion Team, the Sensory Intervention Team, the SEND information and Support Service, the SEND Team, the Educational Psychology Team) are the council teams that are working most closely with schools and the council's School Improvement Team to address concerns regarding the progress and outcomes of children and young people with SEND in Hillingdon's schools.
- Closing the gaps in outcomes and progress for vulnerable children and young people is key to ensuring high standards of education in Hillingdon's schools and the Council recognises that outcomes for children and young people with SEND are not yet consistently strong in all schools or across all phases.
- 2016/17 data highlighted the widening of gaps between outcomes for learners with SEND as they progress to secondary education and indicated that the risk of underachievement was particularly high for young people with SEND who were considered middle ability attainers at primary school. In 2016 the inclusion network was established across the Borough and has broadened its support resource for schools. This has included the re-establishment of the Hillingdon SENCO forums and the introduction of both targeted and optional support and training for schools through the Inclusion Commitment. Those schools who have engaged with the Inclusion Commitment (IC) delivered by the Inclusion Team within Early Intervention, Prevention and SEND Services are providing positive feedback on the impact of the changes they are making on pupils progress. (E.g. "our progress 8 gap for our SEN support is reducing", the IC "has enabled accelerated progress for pupils with speech and language needs", "Increased used of visual prompts in class has enabled specific pupils to make accelerated progress). Officers are analysing the pre and post involvement data for pupils with SEN support and EHCP in the schools engaged in this work to measure the impact of this initiative.

- Analysis of SEND needs in Hillingdon in 2016/17 shows that Communication and Interaction needs including autism and speech and language difficulties continue to be the most prevalent areas of need across the Borough with a higher proportion of young people with SEND displaying needs within the Social, Emotional and Mental Health area of need as they move into secondary education. The significant number of able children and young people with autism in the Borough may explain why outcomes for previously high attaining young people with SEND are generally positive in the Borough.
- Children and young people who are Looked After and have SEND are recognised as a particularly vulnerable group nationally. In 2016/17 Hillingdon had Looked After Children with SEN but without EHC Plans/Statements and Looked After Children with EHC Plans/Statements, equating to 38.1% and 32.2% of the LAC population in Hillingdon respectively and being significantly higher than the national and all London averages for this group. For this reason, partnership working between SEND teams, Social Care, the Virtual School for Looked After Children and partners responsible for school improvement remains an important area of focus.
- At Key Stage 1 the gap between the attainment of children at SEN support in Hillingdon and their non SEND peers, continues to be smaller than the national gap for the same groups of children. For those children EHCP / Statemented the gap this year is wider in Hillingdon than the national gap for the same group of children. At Key Stage 2 the gap between the attainment of children at SEN support and children with EHCP / Statemented and their non SEND peers is smaller than the gap for the same groups nationally.
- At Key Stage 4 it is not yet possible to compare Hillingdon's gaps with national gaps for 2016-17 as this information is not yet available.

Percentages of attainment for children with SEND 2016/17

Table 13: SEN Key Stage 1 2017						
Individual Scores for Reading, Writing and Maths						
Hillingdon Pupils	Actual results for expected standard					
	READING		WRITING		MATHS	
	2016	2017	2016	2017	2016	2017
Not SEN (3413)	82	85	74	78	82	86
SEN Support (479)	35	42	25	25	41	43
LBH gap between Not SEN and SEN Support	47	43	49	53	41	43
National gap between Not SEN and SEN Support	50	50	52	54	47	48
EHCP & Statemented (90)	18	14	12	9	18	12
LBH gap between Not SEN and EHCP & Statemented	64	71	62	69	64	74
National gap between Not SEN and EHCP & Statemented	68	70	65	68	66	69

Source - SFR49_2017_LA_Tables

Table 14: SEN Key Stage 2 2017		
Combined Scores for Reading, Writing and Maths		
Hillingdon Pupils	Actual results for Expected Standard	
	2016	2017
Not SEN (3006)	66	72
SEN SUPPORT (424)	19	24
LBH gap between Not SEN and SEN Support	47	48
National gap between Not SEN and SEN Support	46	50
EHCP & Statemented (125)	10	6
LBH gap between Not SEN and EHCP & Statemented	56	66
National gap between Not SEN and EHCP & Statemented	55	63

SFR69_KS2_2017_LATables_Revised

Table 15: SEN Key Stage 4 2017					
Hillingdon Pupils	English and Maths PASS		Attainment 8	% Ebacc**	
	Standard 9* to 4	Strong 9* to 5		Standard 9* to 4	Strong 9* to 5
Not SEN (2631)	73	50	5	30	27
SEN SUPPORT (330)	32	16	3.3	9	7
LBH Gap between Not SEN and SEN Support	41	34	1.7	21	20
National gap between SEN Support and Not SEN	Not yet available		Not yet available	Not yet available	
EHCP/Statemented (113)	7	5	1.3	2	2
LBH Gap between Not SEN and EHCP/Statemented	66	45	3.7	28	25
National gap between Not SEN and EHCP/Statemented	Not yet available		Not yet available	Not yet available	

Source - FFT Aspire 2017

*9 being the highest grade on a scale of 9 to 1

**English Baccalaureate

Closing the Gap between Disadvantaged Pupils and their Peers

- In 2016/17, all schools continued to receive additional funding from the Department of Education (DfE) to raise the attainment and improve the progress of children and young people from disadvantaged backgrounds. This funding, known as the Pupil Premium grant, can be used by schools in any way that they choose but must show an impact on outcomes for children from the poorest backgrounds. Schools are held to account for the use of Pupil Premium grant funding by Ofsted through the new inspection framework and also through strong governance at individual school and Local Authority level.
- At Key Stage 1, whilst overall outcomes have improved the gap between children eligible for pupil premium funding and their non disadvantaged peers widened in 2016/17 when compared to 2015/16 and is notably wider in Maths.
- At Key Stage 2 the gap between children eligible for pupil premium funding and their non disadvantaged peers is slightly smaller in Hillingdon than the gap between the same groups of children nationally.
- At Key Stage 4 the gap between the young people eligible for pupil premium funding and their non disadvantaged peers narrowed in 2016/17.
- The Hillingdon Innovation and Improvement Networks, launched in March 2016 and supported by the Schools' Strategic Partnership Board, including the Primary Forum Executive and Hillingdon Association of Secondary Head Teachers, focus on the improvement of standards for disadvantaged children and young people. Schools where gaps between disadvantaged children and their non-disadvantaged peers have not shown sufficient improvement in 2016/17 are strongly encouraged to demonstrate engagement with local or national projects to tackle inequality gaps.

Key stage 1 Attainment for children eligible for Pupil Premium funding 2016/17

Table 16: Pupil Premium Key Stage 1 2016 & 2017 Individual Scores for Reading, Writing and Maths						
Hillingdon Pupils	Actual results for Expected Standard					
	READING		WRITING		MATHS	
	2016	2017	2016	2017	2016	2017
Not FSM in last 6 years (3522)	77	80	68	72	78	81
FSM in last 6 years (544)	63	63	54	51	62	60
LBH Gap between No FSM & FSM	14	17	14	19	16	21
National gap between No FSM & FSM	17	17	18	19	17	18

Source - SFR49_KS1_2017_LATables

Note - national data for RWM combined scores is not available. FSM = Free School Meals

Key Stage 2 Attainment for children eligible for Pupil Premium funding 2016/17

Table 17: Pupil Premium Key Stage 2 2017 % for Reading, Writing and Maths Combined	
Hillingdon Pupils	Actual results for Expected Standard*
Not FSM in last 6 years (2504)	70% (63)
FSM in last 6 years (1059)	48% (45)
LBH Gap between No FSM and FSM	22% (18)
National gap between No FSM and FSM	20% (22)

Source: SFR69_KS2_2017_Revised

*2016 results in brackets

Key Stage 4 Attainment for children eligible for Pupil Premium funding 2016/17

Table 18: Pupil Premium Key Stage 4 2016 & 2017						
Hillingdon Pupils	Level 9 to 4: % English and Maths		Progress 8 scores		% Ebacc**	
	2016	2017	2016	2017	2016	2017
Not FSM in last 6 years (1979)	73	73	0.21	0.27	31	31
FSM in last 6 years (1094)	45	50	-0.28	-0.19	14	17
LBH Gap between No FSM and FSM	28	23	-0.49	-0.46	17	14
National gap between No FSM and FSM	28	NA	-0.48	N/A	18	N/A

Source: FfT Aspire 2016 - SFR does not yet have pupil characteristics

*Average Point Scores are the total points achieved by pupils in their best 8 GCSEs (or equivalents).

**English Baccalaureate

All are based on "New First Entry"

Young People Not in Education, Employment or Training (NEET)

- Data published by the DfE in October 2017 shows that 86.6% of 16-17 year olds in Hillingdon are in learning or employment (including apprenticeships) and 7.4% are NEET which represents an improvement of 3.9% in Hillingdon compared to a national improvement of 0.5%.
- Whilst the national statistical release shows an improving picture locally and a greater rate of improvement than compared to the national, it is 12 months retrospective.

The very latest data available is tabled below:

	HILLINGDON (Student numbers in brackets)	REGIONAL AVERAGE
NEET – 16 to 17 year olds	1.8% (127)	1.5%
NOT KNOWN – 16 to 17 year olds	4.3% (294)	7.3%

Source - SFR49 LA Tables

- National averages are not yet available.
- It is noted that the improved position in Hillingdon has been achieved by securing 100% returns from secondary schools in Hillingdon during the summer of 2017 for the first time.
- NEET young people are identified from improved intelligence of the Not Known cohort. Each NEET young person in Hillingdon has a named Lead Professional and all are invited to the quarterly events arranged by the Participation Key Work Team where 3rd sector providers are brought together to create a marketplace of options for NEET young Hillingdon residents.
- Most recently, a Data Sharing Protocol has been agreed with P3 charity to allow for the tracking of Not Known young people and the swift delivery of services to these young people when they are identified as NEET.

Table 19 NEET 16-17 year olds - DfE statistical release for 2016 published October 2017			
	In learning (education and training)	NEET	Not known
England	91.2%	6%	2.8%
Hillingdon	86.6%	7.4%	6%

Source - SFR LA Tables

Hillingdon Adult Learning Service

- The Hillingdon Adult and Community Learning service provides opportunities for adults to learn new skills which align to Hillingdon's priorities and those of the London Local Enterprise Partnership. The programmes of learning are designed to lead to work, enhance life chances, improve wellbeing or encourage greater social cohesion. The service was last inspected by Ofsted in January 2016 and was graded as 'good'.
- The Adult Learning Service continues to deliver positive outcomes for Hillingdon residents with a high proportion of learners achieving their expected learning aims. In 2016-17 the service recruited 2,461 residents into learning, creating 4,553 enrolments by adults in Hillingdon. 71.5% of learners were aged from 25-54, 4% were under 25 and 13.4% were aged 65 and over. The following table summarises the key outcomes.

Hillingdon Adult Learning Outcomes - Percentage of overall results

Table 20 KPI	2014/15	2015/16	2016/17
Achievement rate %	86.4%	89.4%	91.3%
Retention rate %	95.9%	95.8%	96.4%

- Achievement rates: the proportion of enrolled learners who successfully achieve their aims.
- Retention rates: the proportion of enrolled learners who continue until the course ends.

Attendance Outcomes

	HILLINGDON	NATIONAL
State funded absence - Primary	4.1	4
State funded absence - Secondary	5.4	5.2
State funded absence - overall	4.6	4.5
Persistent absentees - Primary	9.3	8.7
Persistent absentees - Secondary	13.6	12.8
Persistent absentees - overall	11.1	10.4

Source - SFR LA Tables

NB figures shown are percentages

- Hillingdon, whilst slightly below national averages in terms of attendance, is sufficiently close to the average to be of moderate concern only. However, the difference between national and local Persistent Absenteeism rates is notable.
- It is noted that schools in Hillingdon are responsible for reporting all persistent absentees, children removed from roll, children on part time timetables and children absent for 20+ consecutive sessions on a monthly basis to the local authority. They are also responsible for referring pupils with concerning attendance to the Participation Key Work team for case work.
- This Participation Key Work service is provided at no cost to maintained schools. Academies are able to commission the service. Currently all but two academies in Hillingdon commission this work. It is evident is that when schools convert to academies, they commission fewer Participation hours than they had previously received as a maintained school at no cost.
- Specific areas of concern relating to attendance are authorised absence and authorised exceptional leave. The duty to authorise absence sits with an individual school and is outside the powers of the local authority.
- In order to support school improvement regarding attendance, two attendance events are provided for all school-based attendance leads per year and include local and national updates, the sharing of best practice and networking opportunities.
- Of the 20,129 penalty notices issued to parents for unauthorised absence across London in 2016/17, Hillingdon was responsible for 301. This profile has been reasonably consistent over the past five years which is not a pattern reflected across all London Boroughs thereby indicating that Hillingdon's use of Penalty Notices is well embedded. A consistent approach in Hillingdon offers clarity and consistency to parents and schools, despite external vagaries such as media coverage of high profile individual cases that have an impact in other London Boroughs.

Exclusions Data for Schools in Hillingdon

- It is noted that the latest nationally comparable data available for school exclusions is for the period 2015/16.
- The Participation Key Work team has delivered services and consultancy to schools when a pupil at risk of permanent exclusion is highlighted by a school and sufficient time to intervene is provided. Academic year 2016/17 saw 78 potential permanent exclusions successfully avoided following intervention.
- Not relating to 2016/17, whilst rates of fixed term exclusion remain broadly positive in Hillingdon compared to national averages, 2015/16 exclusion data highlights a rise in Special School exclusion.

Permanent exclusions - Percentage of overall results

Table 21: Permanent exclusions 2015-16						
Phase	State funded primary		State funded secondary		Specials	
Region	2014-15	2015-16	2014-15	2015-16	2014-15	2015-16
Hillingdon	0	0	0.16	0.20	0	0
England	0.02	0.02	0.15	0.17	0.09	0.08
London	0.01	0.01	0.17	0.176	0.11	0.10

Source - SFR35_2017_LATables_Exclusions

NB – exclusions figures are always reported one year behind

Fixed term exclusions - Percentage of overall results

Table 22: Fixed term exclusions 2015-16						
Phase	State funded primary		State funded secondary		Specials	
Region	2014-15	2015-16	2014-15	2015-16	2014-15	2015-16
Hillingdon	0.42	0.44	7.0	7.44	3.3	13.1
England	1.1	1.21	7.5	8.46	13.54	12.53
London	0.81	0.84	6.71	6.87	13.49	13.34

Source - SFR35_2017_LATables_Exclusions

Schools Placements and Admissions

Secondary School Places

- For the school year starting September 2017, there has been a 2 per cent increase in secondary applications across London, however, Hillingdon experienced a 3 per cent increase. Despite the increase and a record high of 3,416 applications in total for secondary school places Hillingdon remains one of the top Boroughs in West London for allocating school places at a school of choice.
- On National Offer Day, 7 per cent of children in London didn't receive an offer - Hillingdon offered 100 per cent of our applicants a school place.
- 94.9 per cent of Hillingdon pupils received one of their preferred choices.
- 67.4 per cent of pupils were allocated their first choice of secondary school. Some parents choose to put a single school on their application form. Other parents, who are aware

that all their preferences will be considered equally, may decide to use their first preference to rank a school which their child is less likely to be offered and put their more realistic options lower down the list. Therefore it is important to consider how well all preferences have been met, as these are likely to have been more than satisfactory to many parents.

- The Council's school expansion programme continues to deliver school places across the Borough where required. For example, Oak Wood School (formerly known as Abbotsfield School) has undergone a £30.4 million investment offering an additional 75 places and became a co-educational school from September 2017. The Council has also invested £35 million into new school buildings with state-of-the-art facilities at Northwood School to provide 1,080 school places, which included an expansion to provide an additional 30 places in each year group as the school grows.

Primary School Places

- There has been a 4 per cent decrease in primary applications across London - Hillingdon experienced a 2.5 per cent decrease, overall, although it should be noted that geographical variations and parental preference mean that there remains pockets of acute pressure in some parts of the Borough.
- 98.5 per cent of Hillingdon pupils received one of their preferred choices. This was the highest across West London and is above the London offer average.
- 88.7 per cent of pupils were allocated their first choice of primary school. Some parents choose to put a single school on their application form. Other parents, who are aware that all their preferences will be considered equally, may decide to use their first preference to rank a school which their child is less likely to be offered and put their more realistic options lower down the list. Therefore it is important to consider how well all preferences have been met, as these are likely to have been more than satisfactory to many parents.
- During the last year the Council supported Hillingdon residents who were likely to be impacted upon by Pinner Wood School in Harrow which had to leave their site due to health and safety concerns. Officers spoke to 20 Hillingdon parents who would have been allocated a place for their child at Pinner Wood School in September. Parents were offered a duplicate offer to ensure their child would have a secure school place during the uncertainty surrounding the future of the school site. This support was greatly appreciated by residents and 19 of the 20 residents agreed to an additional Hillingdon school offer for National Offer Day. Since then 13 of the 19 parents have continued to accept the additional offer.

Fair Access

- The purpose of Fair Access Protocols is to ensure that outside the normal admissions round unplaced children, especially the most vulnerable, are found and offered a place quickly, so that the amount of time any child is out of school is kept to the minimum. Every local authority is required to have in place a Fair Access Protocol, developed in partnership with local schools. Hillingdon has an 'In Year Fair Access Panel' (IYFAP) to consider these types of school admissions.

- Due to new ways of working and improved communication between the Local Authority and admissions officers based in schools there has been a considerable decrease in the number of primary referrals to the IYFAP. Below is a summary of the referrals made via the IYFAP.
- 35 Year 11 aged children were successfully placed in mainstream schools in 2016/17 via Fair Access Protocols. This represents an increase as the year before 2015/16 was 17. Due to the success of these placements, the IYFAP will now place all mainstream and appropriate Year 11s aged children at Panel for placement.
- 2016/17 saw a 56% decrease in the total number of Primary placements by the IYFAP in comparison to academic year 2015-2016.
- 2016/17 saw an overall 22% decrease in the total number of placements by the Panel in comparison to the academic year 2015-2016.

Table 23

Month/Year Group	Primary referrals							Secondary referrals					Total
	Reception	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Year 8	Year 9	Year 10	Year 11	
September	0	1	0	0	5	0	0	0	0	0	0	22	28
October	0	0	0	0	0	0	0	0	0	0	0	4	4
November	0	1	0	0	2	0	0	0	0	0	0	5	8
December	0	0	0	0	0	1	0	0	0	1	1	3	6
January	0	0	0	0	0	0	0	0	0	0	0	3	3
February	0	0	0	0	0	0	0	0	0	0	0	2	2
March	0	0	0	0	0	0	0	0	0	0	0	2	2
April	0	0	0	0	0	0	0	0	0	0	0	2	2
June	0	0	0	0	0	0	0	0	1	1	0	0	2
July	0	0	0	1	0	0	0	0	1	2	1	0	5
Total per year	0	2	0	1	7	1	0	0	2	4	2	43	62
Total Pri/Sec	11							51					
Total	62												

A small but increasing number of admission cases have been brought to the attention of the Local Authority regarding the reservations that some schools have expressed about their capability to meet a child's specific needs. Although such cases are usually resolved by good communication and teamwork between the Council and the schools who raise concern, it is often the case that schools require clarification of the sources of additional support available from the Council. Once schools access the support available they are very positive about the

adjustments that can be made and training that is available for school staff in order to promote inclusion and enhance opportunities and provision for children with additional needs.

On occasion, schools may indicate a lack of appropriate facilities, resources, or teaching expertise as a barrier to the timely inclusion of a child or young person. It is positive to note that, in Hillingdon such difficulties are usually overcome through local negotiation. However, this process can still result in a delay in accessing the specific provision that the child requires.

The Local Authority is committed to supporting all schools to respond swiftly and confidently to the needs of our young people and has a number of sources of support to help schools integrate children with additional needs quickly into education. This may include working with schools and families to agree staged or staggered admission if necessary, particularly when schools have concerns about meeting needs.

Financial Implications

There are no direct financial implications arising from this report.

RESIDENT BENEFIT & CONSULTATION

The benefit or impact upon Hillingdon residents, service users and communities?

This report ensures that every child in Hillingdon has access to a high quality school place. It is central to putting residents first and is supported by the principles of the Hillingdon School Improvement Plan.

Consultation carried out or required

Not applicable for this report.

CORPORATE CONSIDERATIONS

Corporate Finance

Corporate Finance has reviewed the report and confirm there are no direct financial implications arising from this report.

Legal

Under the Education Act 1996 (Sections 13,13A and 14) the Council has statutory obligations to: ensure that efficient primary, secondary and further education is available to meet the needs of the local population; ensure that its education functions are discharged with a view to promoting high standards; ensure fair access to opportunity for education and learning, and promote the fulfilment of learning potential; and secure that sufficient schools, for providing primary and secondary education, are available for its area.

Whilst there are no specific legal implications arising from the report, Cabinet is advised that the Council's school improvement function is subject to inspection from Ofsted under powers set out in Section 136(1)(b) of the Education and Inspections Act 2006. Specifically, Her Majesty's Chief Inspector may use these powers under the Education and Inspections Act 2006 to inspect compliance of the duties of a local authority as set out in the Education Act 1996. Reports of the findings of inspections under S136 of the Education and Inspections Act 2006 may be of assistance to the Council and/or the Secretary of State in the use of powers under Part 4 of the Education and Inspections Act 2006.

Infrastructure / Asset Management

Not applicable for this report.

Comments from other relevant service areas

All council service areas that are linked to this report have directly contributed to the production of this report. Please see their service area sections within the main body of this report.

BACKGROUND PAPERS

Nil.

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HILLINGDON'S RESPONSE TO THE DRAFT LONDON PLAN

Cabinet Member	Councillor Keith Burrows
Cabinet Portfolio	Cabinet Member for Planning, Transportation and Recycling
Officer Contact	James Gleave: Residents Services
Papers with report	Appendix A: Proposed response to the Draft London Plan

HEADLINES

Summary	<p>The London Plan provides a blueprint for spatial planning in London. The document contains borough specific targets on matters such as house building, climate change and employment land retention and a series of policies to guide the determination of planning applications across the capital. A new version of the London Plan was published for public comment on 1st December 2017.</p> <p>The consultation period runs until 2nd March 2018. This report explains the key content of the new plan, the adoption process and sets out the key points of a proposed response for Cabinet approval. The report concludes that there are a number of policy changes proposed that will have significant adverse impacts on the Borough, its people, its built environment; its natural environment; its heritage and wider policy objectives. The Council's consultation response should reflect these "significant" concerns.</p>
Putting our Residents First	<p>This report supports the Council's objectives of: Our People; Our Built Environment; Our Natural Environment; Our Heritage and Civic Pride by considering how these are impacted upon by policies proposed in the new London Plan.</p> <p>The report also considers how the new plan will affect the delivery of key plans and strategies, in particular the Transport, Economic Development and Housing Strategies.</p>
Financial Cost	The cost of preparing the proposed response and attending the public examination can be met from existing revenue budgets.
Relevant Policy Overview Committee	Residents' & Environmental Services
Relevant Ward(s)	All Wards

RECOMMENDATIONS

That the Cabinet:

1. **Notes the content of the draft London Plan and endorses, in principle, the Council's proposed response attached at Appendix A of this report.**
2. **Grants delegated authority to the Deputy Chief Executive and Corporate Director of Residents Services to make any final changes to the response before submission, in conjunction with the Cabinet Member for Planning, Transportation and Recycling and the Leader of the Council.**
3. **Agrees that officers should meet with representatives from the GLA to discuss the concerns raised and actively participate in the examination process to progress the Council's case.**

Reasons for recommendation

The current version of the London Plan was first published in 2011 and is the overall strategic plan for London, setting out an integrated economic, environmental, transport and social framework for development over the next 20–25 years. The document brings together the geographic and locational (although not site specific) aspects of the Mayor's other strategies, including those dealing with Transport; Economic Development; Housing; Culture; a range of social issues such as children and young people, health inequalities and food; and environmental issues such as climate change (adaptation and mitigation), air quality, noise and waste.

The plan should conform to the NPPF which sets out national planning policies, such as Green Belt protection.

The plan forms part of the Development Plan for Hillingdon and provides the strategic, London-wide policy context within which the Council should set its detailed local planning policies. It is very difficult to under-estimate the importance of the new London Plan, for planning in Hillingdon and London as a whole. It is critical that the Council provides a detailed response to the draft plan, to ensure the interests of residents are fully represented.

Alternative options considered / risk management

To not submit a response to the draft London Plan. In this instance, the Council's views would not be reflected in the final version of the plan, which is expected to be adopted by the Mayor of London in 2019.

Democratic compliance / previous authority

Responses to Greater London Authority consultations ordinarily require Cabinet approval, as set out in the Cabinet Scheme of Delegations.

Policy Overview Committee comments

None at this stage.

SUPPORTING INFORMATION

Background

1. The draft London Plan was published for public comment on 1st December 2017, for a 16 week period. The consultation runs until 2nd March 2018 and the public hearing sessions associated with the examination are expected to take place in the Autumn of this year. These sessions will provide an opportunity to any organisation or individual who has made comments on the draft plan to express these in person to the inspector appointed to conduct the examination proceedings.

2. The new London Plan will run from 2019-2041 and is the third brand new version since the Greater London Authority (GLA) was established in 2000. Previous versions were published in 2004 and 2011 and a number of what are referred to as 'consolidated versions', incorporating modifications and changes, were published in the intervening periods.

3. The draft plan looks very different to the 2011 version and promises a 'step change' from previous approaches, to meet the particular challenges of population growth and housing need. London's population is expected to increase by 70,000 every year and 66,000 new homes are required each year to meet this demand. The Mayor of London's strategy to address these issues is referred to as 'good growth'. In essence, this approach seeks to deliver more affordable homes and economic prosperity, whilst creating a safer, greener city that supports the health and well-being of all Londoners.

4. In many cases, the policies in the new plan have been drafted with specific criteria to be applied directly in the assessment of planning applications. At 528 pages, the new plan is longer than previous versions and more prescriptive on matters such as design, conservation and heritage. GLA officers have stated there is no need for boroughs to duplicate the policies in their Local Plans, unless there are locally specific reasons for doing so. As such, policies can be applied directly in the determination of planning applications.

5. This report highlights key points emerging from each of the chapters in the new plan and summarises the Council's proposed response. The Mayor of London continues to oppose the development of a third runway at Heathrow, but significant issues for Hillingdon are:

- Hillingdon's housing delivery target is increasing from 559 units to 1,553 units per annum.
- 765 units per year are expected to be delivered from 'small sites', including a presumption in favour of extensions, conversions, redevelopment and infill development within 800 metres of a tube station or town centre. There is also no longer a presumption against back-land development (so called garden grabbing).
- There is a clear policy of shifting housing growth to outer London Boroughs and that more housing should occur in the suburbs.
- The protection of the Green Belt is potentially undermined.
- Car parking standards have been significantly reduced. Areas with a PTAL of 5-6 have a nil parking standard.

6. The following sections of the report summarise the key content of the draft plan and the Council's proposed response to each of the chapters, which is attached in full at Appendix A.

The Concept of Good Growth

7. The Mayor of London's concept of good growth sits at the heart of the new plan. In essence, this means addressing London's significant housing and economic growth requirements in a sustainable manner. The concept includes:

- Building strong and inclusive communities through the generation of economic growth, the promotion of town centres as social and economic hubs and good design.
- Making the best use of land to create high-density, mixed-use places, through the prioritisation of Opportunity Areas and intensification of land use.
- Improving Londoners' health and reducing health inequalities; the promotion of healthy lifestyles, assessing the impact of development on health and well-being and adopting the 'healthy streets' approach.
- Creating a housing market that works better for all Londoners through the delivery of more homes, a strategic target of 50% affordable housing and homes that meet high standards of design.
- Growing a good economy, seeking to diversify London's economy and sharing the benefits in a more equitable manner, planning for sufficient employment and industrial floorspace in the right locations and maximising London's existing and future public transport.
- Helping London to become more efficient by supporting the Mayor of London's objective to become a 'zero carbon' city by 2050, ensuring that buildings are designed to adapt to a changing climate and creating a safe and secure environment that is resilient against emergencies, such as fire and terrorism.

Chapter 2: Strategic Growth

8. The primary purpose of the plan is to deliver housing and employment growth across London, to address projected population growth and housing needs. Specific reference is made to outer London in this context, where the suburban pattern of development is described as having significant potential for intensification to deliver more homes.

9. The current London Plan identifies a number of 'Opportunity Areas', for housing and employment growth, including the Heathrow Opportunity Area, which relates to the southern part of Hillingdon and the northern part of Hounslow. This area is currently identified as having an indicative employment capacity of 12,000 new jobs and a minimum of 9,000 new homes.

10. In addition to those identified in the existing plan, six new Opportunity Areas are proposed within a series of 'growth corridors', which are identified to bring forward housing and employment growth in a co-ordinated manner. The proposed new Heathrow/Elizabeth Line West growth corridor incorporates part of Hammersmith and Fulham, Ealing, Hounslow and Hillingdon. It includes the existing Heathrow Opportunity Area where growth targets have increased to 13,000 new homes and 11,000 new jobs and a new Opportunity Area for Hayes, to

deliver 4,000 new homes and 1,000 jobs. The level of growth in the Hayes Opportunity Area broadly reflects the proposals for the Hayes Housing Zone.

11. At a strategic level, the Mayor of London proposes a 'town centre first' policy, which seeks to protect town centres for retail, commercial, offices, leisure entertainment, cultural and tourism and hotel uses. High density residential development, which capitalises on the availability of services within walking distance, is also encouraged.

Summary of the proposed response to Chapter 2

12. The key issues of concern for Hillingdon relate to the proposed increase in the Council's housing target and also the significant reduction in car parking standards, which is not considered to be sustainable for residents in outer London. The proposed response is set out in full at **Appendix A** of this report. The comments regarding the potential for the intensification of the suburban pattern of development would herald very damaging and irreversible change to the character of Hillingdon's towns and village centres.

13. The purpose of the London Plan is to provide a strategic spatial planning framework for London, rather than detailed planning policies to be used in the determination of planning applications. As it stands, the document is far too prescriptive. A number of policies are not of strategic importance to Greater London and should be deleted.

14. The specific policies relating to outer London's vision and strategy, economy and transport contained in the current London Plan are proposed to be removed. These policies are essential in recognising the specific differences in the development needs of inner and outer London. The conclusions of the work undertaken by the Outer London Commission on car parking provision, economic and housing growth should continue to be reflected in the new plan and these specific policies, or something similar, should be reinstated.

15. There is a concern that the Council was not consulted on the proposed new Opportunity Area (OA) for Hayes, in advance of the draft plan being published. Whilst the Hayes OA broadly reflects the provisions of the Housing Zone, the proposals should be developed alongside and in consultation with boroughs, rather than imposed on them.

16. There needs to be greater recognition of the differences between and development needs of inner and outer London centres. For example, outer London centres often serve as shopping destinations for those living outside of London, where public transport is poor. These transport connections should not be ignored.

Chapter 3: Design

17. The draft plan notes that the form and character of London's buildings and spaces must be appropriate for their location, fit for purpose and make the best use of a finite supply of land. The document contains specific policies on London's Form and Characteristics and Delivering Good Design and is far more prescriptive on these matters than previous versions of the plan. This reflects the intention that policies can be used in the determination of planning applications, in the absence of suitable Local Plan policies.

18. Of particular note is policy D3 on inclusive design. In addition to ensuring the highest standards of access, the policy seeks to ensure safe and dignified emergency evacuation for all building users. It notes that in developments where lifts are installed, at least one lift per core should be a fire evacuation lift. This is consistent with the provisions of policy D11 on Fire Safety, which requires all major development proposals to be submitted with a fire safety statement, produced by a third party suitably qualified assessor. Whilst these matters are currently covered by Building Regulations, the supporting text to the policy notes that applicants should consider matters of fire safety in advance of the Building Regulations stage.

19. One of the most significant changes to the current version of the plan is the proposed removal of the 'Sustainable Residential Quality' density matrix, which provides density guidelines for new housing development. The proposed 'optimum density' approach is based on an evaluation of the surrounding characteristics, context and capacity for growth. Management Plans should be submitted with higher density developments to demonstrate how day to day servicing and delivery will be achieved.

20. Improving the public realm across London is seen as being central to achieving the Mayor's objective of 'good growth'. Policy D7 proposes a range of measures to achieve this including the adoption of a healthy streets approach, legible signposting across the street scene, careful consideration of street lighting and the provision of free drinking fountains to improve public health and reduce waste from single use plastic bottles.

21. Policy D12: Agent of Change is a proposed new addition to the London Plan, which places the primary responsibility for mitigating the impacts from noise generating activities on the proposed new noise sensitive development. This means that where new development is proposed close to existing noise generating uses, applicants will need to design them in a way which protects the new occupiers. The Agent of Change principle works both ways. If a noise generating use is proposed close to existing noise sensitive uses, the onus is on the new use to ensure its building or activity is designed to protect existing users from noise impacts.

Summary of the proposed response to Chapter 3

22. Whilst the focus on good design is supported, it is unclear how some of the proposed measures can be implemented. Furthermore, many of the proposed provisions are not of strategic importance to Greater London and should not be included in the London Plan. The increased emphasis on design review and the consideration of fire safety assessments, to be submitted with all major development proposals will place additional burdens on boroughs. It is unclear how these measures will be delivered or funded.

23. Policies relating to noise add nothing to the existing policy framework that covers noise management and planning. Heathrow airport is a major source of noise that must be considered a strategic and spatial issue that warrants prescriptive attention in the London Plan. Hundreds of thousands of people suffer from health impacts caused by noise nuisance and the London Plan remains silent on the issue, whilst providing a generic noise policy that adds nothing new. Officers are of the view that noise issues around Heathrow should be given specific attention with a bespoke policy. This should relate to the assessment methodology as well as the triggers for mitigation.

24. It is also unclear how the significant focus on good design squares with the proposed delivery of such a large number of new homes and the development of small sites. The pressure to deliver small sites in such large numbers will undoubtedly result in poorly designed conversions, development that is out of character with surrounding land uses and the approval of sites that would not normally be granted planning consent.

Chapter 4: Housing

25. The draft plan proposes to increase Hillingdon's 10 year target for net residential completions from 5,590 to 15,530 units; an annualised average of 1,553 units. This total includes a 10 year target for small sites under 0.25 hectares of 7,650 units, annualised as 765.

26. Small sites under 0.25 ha are required to play a much greater role in the delivery of new homes. In this regard, boroughs are expected to recognise that local character evolves over time and will need to change in appropriate locations, to accommodate additional housing provision. Boroughs are also expected to prepare area-wide design codes to encourage good design and to encourage higher residential densities on small sites.

27. Boroughs are expected to apply a presumption in favour of the following types of small site development, which provide between 1 and 25 homes:

- Infill development on vacant or underused sites
- Proposals to increase density on underused sites within PTALs 3-6 or within 800 metres of a tube or rail station through: Residential conversions and extensions, the demolition and redevelopment of existing buildings and infill development within the curtilage of an existing house
- The redevelopment or upward extension of flats and non-residential buildings.

28. The presumption means approving small site housing development, unless it can be demonstrated that the proposal would give rise to an unacceptable level of harm. To further compound the harm this will cause, the policy protection which exists in the current London Plan to prevent back-land development (re: garden grabbing) has been removed.

29. A strategic target is set for 50% of all new homes to be delivered as affordable housing. A threshold for affordable housing provision is set for proposals which are capable of delivering more than 10 units, or those with a combined floorspace greater than 1,000 sqm. The threshold level for affordable housing is initially set at 35% and 50% on public sector land and designated employment land.

30. Tenure split for affordable products is set at 30% low cost rented homes, 30% intermediate products and 40% to be determined by individual boroughs, based on identified need. In addition, a new policy states that large scale purpose-built shared living developments may have a role to play in meeting housing need in London.

31. Policy H12 relates to unit size, noting that boroughs should not be prescriptive on the type of units required. Whilst family units have historically been considered as those with 3 or more bedrooms, many families live in two bedroom units. The draft plan states that this should be considered when assessing the need for different sized units.

32. The draft plan provides general support for build to rent schemes. This form of tenure is not subject to the same affordable housing requirements as owner occupation and could be seen by developers as financially preferable.

33. Finally, the draft plan includes policies to deliver housing for specialist groups. Specific borough benchmarks are provided for older persons' housing and a definition is provided for Gypsy and Traveller Groups for planning purposes, which differs from that contained in the Government's Planning policy for traveller sites.

Summary of the proposed response to Chapter 4

34. Hillingdon's housing target of 1,553 homes per year is not considered to be achievable. On average, 749 homes have been built in the Borough each year over the last 4 years. Whilst the Hayes Housing Zone will increase housing delivery to a degree, such a significant increase in the target will not be delivered, unless significant harm is caused to the existing built environment.

35. The Plan has neither appraised nor understood the 'suburban pattern of development' in London, for its intensification policy would have far reaching and very damaging consequences for outer London boroughs. This is particularly true of Hillingdon, which is one of the least developed. Hillingdon comprises a number of former mediaeval and post-mediaeval villages and small towns which grew up along the roads leading out of London: Each has its own historic character and the sense of place and identity which their residents experience is very strong. Moreover, each historic core has been designated a Conservation Area, with other Conservation Areas capturing the quality of their Victorian, or interwar, residential or canalside industrial suburbs.

36. There is already pressure to 'extend to convert', redevelop or infill in the back gardens of larger houses and this has often led to compromised designs, a loss of well detailed Victorian and 1920's houses and a creeping reduction in, or loss of, gardens with their amenity, biodiversity and flood mitigation value, an increase in hard standings, and a relentless incremental erosion of the cherished streetscene. With a strong presumption in favour of intensifying development of this type, within 800m of underground stations or town centres, in this ad hoc, incremental way, the pressures would be greatly increased and large swathes of the Borough would be hugely compromised in their character and amenity, with their history illegible to visitors and their green settings lost.

37. There is no clear protection for Conservation Areas or local heritage designations in these policies, nor for the settings of listed buildings, which should be taken into account when considering proposals for new development. 'Underused sites' could be interpreted as large family houses with gardens whilst 'unacceptable levels of harm to designated assets' would be difficult to determine and even more difficult to agree. There are at least 17 Conservation Areas and numerous Areas of Special Local Character in this Borough which would be directly affected by the Policy to target sites within a set radius of the Borough's seven town centres and fifteen stations. A catch all GLA Design Guide could never provide the subtlety necessary for preserving the character of the many towns and villages which make up Outer London, whilst the specialist resource required by each Borough to write individual design codes for all of these areas would be unrealistic and the task unattainable.

38. Furthermore, the small sites component of the target of 765 units per annum bears no resemblance to what has been delivered in recent years. Hillingdon has delivered an average of 176 units per annum on small sites over the last 8 years. Such a reliance on small sites does not constitute a strategic approach to housing delivery which should be progressed through the London Plan. It is not considered that policy H2 will accelerate delivery to such a significant degree and will, in fact, lead to inappropriate development.

39. Boroughs have no specific means of allocating or controlling the delivery of residential units from small sites. This will lead to housing targets being missed and the loss of planning appeals on sites that would not normally be granted planning consent - for example, the development of Green Belt land, which is strongly opposed by the Mayor.

40. The target to deliver 35% of all new units as affordable housing is consistent with the Council's current threshold. However, the proposed strategic target of 50% affordable housing provision is not supported. This target was included in the 2004 version of the London Plan and was never achieved. There is no clear justification why the 50% target has been re-introduced or how it will be achieved under the proposed new policy framework.

41. Two bed units should not be regarded as family housing. This will restrict the delivery of larger three and four bed units, exacerbate problems of overcrowding and ultimately force families to move outside of London. Furthermore, shared living schemes, which are excluded from the minimum floorspace standards for residential accommodation, should not be regarded as a solution to address housing needs.

42. Whilst it is acknowledged that Build for Rent has a role to play in housing delivery, this should not be at the expense of developing new homes for sale. Owner occupation is still the tenure that many aspire to and although it requires greater up-front expenditure, the ongoing housing costs are comparable and in some instances less than housing for rent.

43. In relation to specialist housing, the acknowledgement of the needs of older persons in London is supported. However, proposed change in the definition of Gypsy and Traveller Groups set out in draft policy H16 differs significantly from that contained in the DCLG Guidance document, which was used in the recently completed Gypsy and Traveller Assessment for Hillingdon. There is no justification for a departure from national planning guidance on this matter and the DCLG definition should be retained in the policy.

Chapter 5: Social Infrastructure

44. Chapter 5 of the plan contains policies which seek to ensure an appropriate level of social infrastructure is delivered to support planned growth. Specific policies are included to address health and social care, education and childcare, play and informal recreation, sports and recreation facilities and burial space. Large scale commercial developments that are open to the public should provide and secure the management of free publicly accessible toilets, which are suitable for a range of users including disabled people and families with young children.

Summary of the Council's proposed response to Chapter 5

45. The delivery of social infrastructure is essential to support the ambitious housing targets that are put forward in the plan. If boroughs are expected to deliver such high levels of growth, the Mayor of London should provide direct funding to ensure the delivery of essential health and education facilities.

Chapter 6: Economy

46. Boroughs are encouraged to introduce Article 4 Directions to protect strategically important office space to ensure these areas are not undermined by office to residential permitted development rights. The Council has already implemented this approach through the Article 4 direction that restricts office to residential permitted development rights in Uxbridge, Stockley Park and the Heathrow Perimeter.

47. The draft plan notes that the release of land for industrial land uses, including the designated Strategic Industrial Locations, has far exceeded release benchmarks set in previous London-wide guidance. Overall, the plan seeks to achieve no net loss of industrial floorspace capacity across London.

48. Each borough is categorised according to whether designated industrial land should be retained or released for other uses. Hillingdon is categorised to retain capacity, which means there should be no net loss of industrial floorspace across the Borough. Strategic Industrial Locations continue to be protected for industrial, storage/distribution and logistics uses.

49. Policy E7 encourages boroughs to explore the potential to intensify industrial activities on industrial land and consider whether some types of industrial activity could be co-located or mixed with residential development. The policy states that boroughs should work with the Mayor of London and be pro-active in encouraging this approach. A number of worked examples are set out in the plan to show how the co-location of industrial/storage and residential uses could work.

50. The draft plan seeks to encourage a diverse and vibrant retail sector and specific reference is made to development proposals containing A5 hot food takeaways. Policy E9 notes that these should not be permitted where they are within 400 metres of an existing or proposed school.

Summary of the Council's proposed response to Chapter 6

51. The principle to retaining the Borough's supply of designated employment land is broadly supported. However, given the significant pressure from owners/occupiers for residential/mixed use development and the flexibility that the draft plan provides to release business space, this objective may be difficult to achieve.

52. Officers are of the view that there is not enough policy support to retain economic activity in outer London centres like Uxbridge, or to deliver the infrastructure that is necessary to achieve this objective. Specific reference should therefore be made in the plan to the extension of the Central Line from West Ruislip to Uxbridge. Officers note the priority given to the delivery of Old Oak Common, however direct support should also be provided to secure the long-term

prosperity of both Uxbridge town centre and Stockley Park, to prevent this expansion being to the detriment of other outer London employment areas.

53. Officers broadly support the proposal to support retail development in town centres. Whilst concerns regarding the proliferation of hot food takeaways are understood, these uses are preferred to vacant shop units, which become magnets for anti-social behaviour. In this regard, the moratorium on A5 uses within 400 metres of a school is not supported.

Chapter 7: Heritage and Culture

54. The draft plan contains a series of highly prescriptive policies to protect and promote heritage across the capital. Boroughs are encouraged to develop evidence that demonstrates a clear understanding of the historic environment.

55. A new policy is included to protect public houses that have heritage, economic, social or cultural value and supports proposals for new public houses to stimulate town centre regeneration.

Summary of the Council's proposed response to Chapter 7

56. There are serious concerns that the heritage related policies will be undermined by the housing growth policies contained in other chapters of the plan. It is imperative the heritage based planning policies seek to protect the wider settings of heritage assets; otherwise such assets will have their value eroded by nearby developments which adversely impact on their settings and wider significance. This is of particular concern with regard to Conservation Areas and Areas of Special Local Character, which cumulatively cover large parts of the Borough.

57. The protection of public houses is supported, but changes are required to policies that seek to protect heritage assets.

Chapter 8: Green Infrastructure and the Environment

58. Chapter 8 seeks to protect London's open and green spaces and biodiversity. Policy G1 relating to green Infrastructure notes that Boroughs should prepare green infrastructure strategies to integrate the objectives relating to open space provision, biodiversity, conservation, flood management, health and well-being and sport and recreation.

59. Whilst policy G2: London's Green Belt states that the protection of the Green Belt is maintained, it also states that *'the enhancement of the Green Belt to provide appropriate multi-functional uses should be supported'*. This is considered to be a departure from the wording used in the National Planning Policy Framework.

Summary of the Council's proposed response to Chapter 8

60. The proposed wording of draft policy G2 is a matter of serious concern. The existing London Plan Green Belt policy mirrors the National Planning Policy Framework (NPPF) text; and the current NPPF/London Plan policy wording has been very effective in preventing inappropriate development in the Green Belt.

61. Any weakening of current Green Belt policy will not, in reality, result in more efficient use of Green Belt land for uses of community benefit (if this is the intention) but instead be the subject of speculative development proposals by the development industry. Therefore, it is considered that the Council should strongly object 'in principle' to the change in wording of the policy. The above issue will be compounded if (as expected) increased unachievable housing numbers place further pressure on Green Belt land to be released.

62. Whilst the protection of Metropolitan Open Land is supported, the draft plan should also refer to the protection of Green Chains, which provide a natural resource across London.

Chapter 9: Sustainable Infrastructure

63. This chapter relates primarily to air quality, climate change, water supply matters and waste management. Policy SI1 states that London's air quality should be significantly improved. Development proposals should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local problems of air quality. Air quality focus areas are broadly identified in the plan for each borough.

64. To minimise greenhouse gas emissions, major development schemes are expected to be zero carbon. In meeting this target, a minimum on site reduction of at least 35% beyond building regulations is expected. Residential development should aim to achieve 10% and non residential development should achieve 15% reductions, through energy efficiency measures. Boroughs should establish a carbon offset fund, which should be ring-fenced and used to deliver greenhouse gas reductions.

65. The draft plan notes that London is already experiencing higher than average temperatures due to climate change and emphasis is placed on seeking to ensure that development proposals minimise internal heat gain and the impacts of the urban heat island through design, layout, orientation and materials. Specific building design measures are proposed to address this issue and major development proposals should demonstrate through an energy strategy how they will reduce the potential for overheating and reliance on air conditioning systems.

66. Whilst the overall waste management target for London has reduced, the share of waste (referred to as the apportionment) that Hillingdon is required to manage over the period of the plan has increased significantly. The proposed apportionment figure has risen back to similar levels contained in the version of the London Plan published by Boris Johnson in July 2011.

67. Flood risk is expected to be managed in a sustainable and cost effective way, in collaboration with key stakeholders. Development Plans should use the Mayor's Regional Flood Risk Appraisal, Strategic Flood Risk Assessment and Surface Water Management Plans to identify areas of particular flood risk.

Summary of the Council's proposed response to Chapter 9

68. Whilst many of the principles set out in this chapter are supported, additional burdens have been placed on boroughs and it is difficult to envisage how the practical implementation of policies could occur. As an example, policy SI1 relating to Improving air quality needs to be far more robust with clear targets and triggers for mitigation.

69. The Council recommends the approach adopted by the previous Mayor with respect to achieving carbon reduction emissions. Development, where required, should be able to demonstrate the baseline emissions and the necessary reductions. If the solutions cannot be found onsite, then the Policy should contain clear support for finding offsite solutions through an Air Quality improvement fund. The Mayor should invest time and resource in developing and implementing an appropriate mechanism, including formula for assessing contributions.

70. The Policy as written introduces an ambiguous approach that complicates implementation significantly. Ultimately, it will be left to the Borough to provide the detailed interpretation. Evidence from the Carbon Reduction policies shows how a well articulated and clearly defined policy can be implemented in practice. The air quality policy should follow that successful approach. Officers have provided a number of detailed comments on the flood risk and water management policies. These are contained in the Council's draft response at Appendix A.

Chapter 10: Transport

71. The key themes of the chapter relate to transport matters, car parking provision and aviation policy. Development proposals should facilitate residents making shorter, regular trips by walking or cycling and support the ten 'healthy streets' indicators. Cycle parking standards remain largely unchanged from the current version of the Plan, however car parking standards have been reduced and reformatted. The proposed car parking standards, as set out in the draft plan, are as follows:

Location	Maximum Parking Provision
Central Activities Zone Inner London Opportunity Areas All areas of PTAL 5-6 Inner London PTAL 4	Car free
Inner London PTAL 3	Up to 0.25 spaces per unit
Inner London PTAL 2 Outer London PTAL 4 Outer London Opportunity Areas	Up to 0.5 spaces per unit
Inner London PTAL 0-1 Outer London PTAL 3	Up to 0.75 spaces per unit
Outer London PTAL 2	Up to 1 space per unit
Outer London PTAL 0-1	Up to 1.5 spaces per unit*
*Where small units generally make up a proportion of a development, parking provision should reflect the resultant reduction in demand so that provision across the site is less than 1.5 spaces per unit.	

72. In relation to Aviation, Heathrow airport expansion is opposed, unless it can be shown that no additional noise or air quality harm would result. The Mayor's support for the expansion of Gatwick airport is not reflected at all within the document.

Summary of the Council's proposed response to Chapter 10

73. Officers are concerned that the proposed car parking standards do not relate to the travel patterns of residents in the Borough for the following reasons:

- LBH has extremely poor public transport accessibility (percentage of PTAL by area) in comparison to all other London Boroughs, typified by:
 - 86% of the residential population living within an area of PTAL less than 2 (defined as 'poor' by TfL); and
 - 51% of the residential population living within an area of PTAL between 1 and 1b (defined as 'very poor by TfL);
- An assessment of journeys between key destinations has determined that public transport does not provide a viable alternative for the vast majority of trips. Analysis shows 89% of trips being quicker by car than public transport;
- An assessment of 2,506 'points of interest' within the Borough (shops, doctors' surgeries etc.) concludes that 46% are located in areas with low public transport access.
- In comparison with other parts of London, Hillingdon has a significantly higher number of points of Interest in PTAL 3 areas or below and the lowest number of points of interest in areas of PTAL 4 or above.
- Car ownership in Hillingdon is higher than in any other London borough, correlating with the lowest average PTAL;
- An assessment of cars owned vs mode of travel to work indicates that higher parking standards do not necessarily translate to lower car use for work and therefore congestions during peak periods;
- Amongst all other London boroughs, Hillingdon has a significantly higher number of residents working outside of Central London. This explains the need for higher car ownership in Hillingdon when compared to other boroughs;
- Hillingdon is the London borough with the highest amount of residents travelling to work by car, reflecting the number of residents that work outside of London and the limited availability of public transport.

74. Without a step change in public transport availability there will always be a greater need for residents to travel by car when undertaking trips both in and around the borough, in comparison to many other London Boroughs. An appropriate level of employment generating uses is essential to maintain economic prosperity, particularly in outer London. As a result and taking account of the above points, the Mayor of London's proposed car parking standards are not considered to be appropriate for Hillingdon.

75. The Mayor's position that Heathrow should not be expanded is supported. However, there is no strategic policy to promote expansion of Gatwick. Clearly this is a matter of strategic importance for the GLA and therefore should warrant coverage somewhere in the plan.

Next Steps

76. The consultation period for the new plan runs until 2nd March 2018. Going forwards, the key dates for the draft plan are as follows:

Action	Date
Cabinet/Cabinet Member approval of the draft proposed response	15 th February 2018
Sign off final draft response by the Leader of the Council, Cabinet Member for Planning, Transportation and Recycling and the Deputy Chief Executive and Corporate Director of Residents Services.	End of February 2018
Submit response	Beginning of March 2018
Public examination	Autumn 2018
Adoption of the new London Plan	Autumn 2019

Financial Implications

The cost of preparing the proposed response and attending the public examination can be met from existing revenue budgets.

RESIDENT BENEFIT & CONSULTATION

The benefit or impact upon Hillingdon residents, service users and communities?

Policies in the London Plan have a direct impact on all aspects of the natural and built environment in Hillingdon. The new London Plan will therefore have a significant impact, both short-term and long-term, upon residents, businesses, service users and all members of Hillingdon's communities.

Consultation carried out or required

This is the first and only round of consultation which commenced on 1st December 2017 and is due to run through until 2nd March 2018. The Council's response will be forwarded on to the Planning Inspector appointed to undertake the examination.

CORPORATE CONSIDERATIONS

Corporate Finance

Corporate Finance has reviewed this report, confirming that the direct costs associated with the recommendations above will be managed within existing service budget. Notwithstanding the practical challenges associated with achieving the proposed substantial increase in Hillingdon's housing delivery target from 559 units to 1,553 units per annum from 2019/20, such a marked increase in population would likely lead to equivalent growth in demand-led services and associated costs which will be incorporated into future iterations of the Council's Medium Term Financial Forecast as appropriate.

Legal

The Mayor of London is required pursuant to the Greater London Authority Act 1999 to consult all London boroughs on the draft London Plan and to take into account all consultation responses. At the end of the consultation period the consultation responses will be reviewed by an independent Planning Inspector appointed by the Secretary of State to carry out the Examination in Public (EIP) for the draft London Plan.

Following adoption of the draft London Plan (which may incorporate alterations following the consultation process and recommendations put forward by the Planning Inspector following the EIP), the London Plan will form part of the Council's Development Plan (the statutory basis for planning decisions).

In accordance with Section 24(1)(b) of the Planning and Compulsory Purchase Act 2004, the Council's Local Plan must also be in general conformity with the London Plan.

Therefore, once the draft London Plan is adopted, the Council will need to determine whether its own Local Plan policies continue to be in general conformity. Should this not be the case, the Council will need to bring forward its own set of alterations to the Local Plan to bring this into general conformity.

Infrastructure / Asset Management

There are no specific Property and Construction implications arising from the recommendations in this report at this stage. However in general terms the target of 50% affordable housing will reduce values of council owned sites identified for disposal, although other policies which may lead to increased densities may mitigate this effect to some extent.

BACKGROUND PAPERS

NIL

1 Introduction and summary

1.1 The following document sets out the London Borough of Hillingdon's comments on the draft London Plan, which was published for public comment on 1st December 2017. The Council welcomes the opportunity to comment on the draft plan, but is extremely concerned about the Mayor's growth aspirations, which are not considered to be deliverable over the plan period.

1.2 Notwithstanding the highly prescriptive nature of the policies within the document, the Council does not consider that the plan encourages good growth or sustainable development. Overall, the proposed level of growth will have an adverse impact, particularly in outer London boroughs like Hillingdon and result in adverse outcomes such as the loss of Green Belt land, which is the polar opposite of what the Mayor is seeking to achieve.

1.3 The Council's comments on each of the chapters in the draft document are set out in the following paragraphs. The key points contained within Hillingdon's response are as follows:

- The highly prescriptive nature of the draft plan limits the flexibility for boroughs to develop their own policies to address locally specific circumstances. In this sense, the document goes far beyond the remit of the Greater London Authority Act, which states that the Mayor's Spatial Strategy should only deal with matters that are of strategic importance to London.
- The Council is concerned that the draft plan fails to provide sufficient differentiation between the development needs of inner and outer London. The work undertaken by the Outer London Commission to support the current version of the plan should continue to be recognised.
- The Council disputes the statement that in outer London, the suburban pattern of development has significant potential for intensification. Suburban development is a fundamental and long-standing component of London's urban character. It is one of the factors that defines London and makes it a unique city.
- The Mayor's approach to small site development has the potential to destroy much of the suburban character in outer London through inappropriate development. This is an unacceptable outcome of a policy that will fail to deliver growth in a sustainable manner.
- The proposed housing target for Hillingdon of 1,553 units per annum will not be delivered.
- The Council is concerned that the Mayor's proposed standards for car parking are inappropriate for Hillingdon, where residents rely heavily on the use of a car to go about their daily lives.

- The Mayor's continued opposition to the expansion of Heathrow Airport is supported. However, the Council is disappointed that there is no strategic policy to promote the expansion of Gatwick.

2. The overly prescriptive nature of the plan

2.1 The Greater London Authority Act 1999 sets out the scope for the preparation of the Mayor's Spatial Development Strategy, the London Plan. Part VIII, para 334[5] states:

'The spatial development strategy must deal only with matters which are of strategic importance to Greater London.'

2.2 The draft plan contains over 100 policies and is over 500 pages in length. The plan fails to provide policies relevant to key strategic issues, whilst being overly prescriptive for non strategic matters. Many strategic issues have been further complicated through generic policies that simply pass the problem to boroughs. Ultimately, the plan introduces countless more policies and rhetoric to be considered when fulfilling local planning obligations of little strategic relevance, requires further assessments to be submitted and considered and blurs the line with local issues and other forms of planning control.

2.3 For example, as currently worded, the proposed policy for Noise adds little to existing policies and guidance and fails entirely to address the noise implications from Heathrow airport, despite this being of clear strategic importance for hundreds of thousands of people. This is a clear example of the plan tackling the wrong remit.

Air Quality

2.4 The issue of air quality is clearly a strategic matter that affects all Londoners, yet the air quality policy is vague, lacks clarity and requires boroughs to find ways to interpret the policy and then implement. The only additions to the general policy approach of the National Planning Policy Framework are not workable in planning terms. Policy SI1 states:

Development proposals should not: a) lead to further deterioration of existing poor air quality.

2.5 Most development is likely to result in additional traffic movements, which inherently will add to existing pollution levels. Whilst the aim of the policy is welcomed, it should provide boroughs with effective, practical and workable planning criteria. This policy will result in a range of different approaches being taken across London and may not achieve the aims of improving air quality.

2.6 In general, it appears that the desire to provide a London Plan that covers every single planning matter is at the expense of targeting policies to only the

strategic topics. It is also concerning that the Mayor has effectively passed the responsibility of finding solutions to significant issues to boroughs, which is not the intention of the Greater London Act 1999.

Aviation

2.7 The Council supports the Mayor's position that Heathrow should not be expanded and that instead the existing environmental conditions improved dramatically. However, the Council is disappointed that there is no strategic policy to promote the expansion of Gatwick. Clearly this is a matter of strategic importance for the GLA and therefore should warrant coverage somewhere in plan.

3. Chapter 1: Good Growth

3.1 Whilst the general intention to deliver 'good growth' is supported, it is not considered that it is possible to bring forward the proposed level of housing development in a sustainable manner. The proposed housing delivery targets will have significant and adverse social, economic and environmental consequences. The Council's detailed comments on these policies are set out below.

Policy GG1: Building Strong and inclusive communities:

3.2 The Council supports the general notion that spatial planning can have significant impacts on social outcomes. However, this section of the plan should refer to the importance of open space and green Infrastructure in achieving positive health outcomes. Specific comments on this policy are as follows:

Criterion C should read:

'Ensure that streets, public and private open and green spaces are planned for people...'

Criterion D should read:

'Promote the crucial role town centres have in social, civic, cultural, historic and economic lives...'

Criterion E should specifically refer to the 'local distinctiveness' of an area and read:

'Ensure new buildings and the spaces they create are sensitively designed to reinforce and enhance the accessibility, legibility, permeability, and inclusivity of new and historic neighbourhoods, and are appropriately resilient and adaptable...'

Policy GG2: Making the best use of land

3.3 The Council does not consider that the creation of high density, mixed use places should be a specific outcome for this policy. This approach is a backward step to the 'town cramming' policies proposed in previous versions of the London Plan, which failed to meet housing needs or deliver a high quality environment. Instead, the policy should focus on striking a balance which reflects the character of surrounding land uses and meets locally identified needs.

3.4 The reference to the development of small sites should be removed from the policy. The proposed approach cannot be controlled through the development plan process and does not represent a strategic or sustainable means of meeting London's housing needs. Housing targets containing an unrealistic proportion of small site provision will not be met. This may well result in the development of sites that would not normally be granted planning consent and the loss of Green Belt land on appeal.

3.5 Criterion E of the policy sets a strategic target for 80% of all journeys using sustainable transport and refers to a car free lifestyle. This target is unrealistic for Hillingdon, where public transports links do not serve many of the destinations that many residents need to travel to. Residents therefore rely heavily on the private car to travel north to south in the Borough and outside of London. The target will not be achieved without significant investment in public transport provision, which is co-ordinated with local authorities outside of the capital.

3.6 The specific policies relating to outer London's vision and strategy, economy and transport contained in the current London Plan are proposed to be removed. These policies are essential in recognising the specific differences in the development needs of inner and outer London. The conclusions of the work undertaken by the Outer London Commission on car parking provision, economic and housing growth should continue to be reflected in the new plan and these specific policies, or something similar, should be reinstated.

3.7 Specific comments on the policy are as follows:

Criterion C should read:

'Understand what is valued about individual existing places...'

Criterion D should read:

'Protect London's Open Land, designated nature conservation sites, other designated sites and local green spaces, and promote the creation of new and enhancement of existing green infrastructure and urban greening.'

Policy GG3: Creating a healthy city

3.8 The policy should specifically refer to enhancing and improving the provision of health services and infrastructure and ensuring it is designed and considered as part of the planning and development process.

Policy GG4: Delivering the homes Londoners need

3.9 The proposed strategic target to deliver 50% of all new homes as affordable housing is not considered to be achievable. The Council is aware that the 2004 version of the London Plan included a 50% target for affordable housing provision and that this was not delivered. The draft plan contains no additional incentives to ensure the target is delivered and does not explain its economic viability.

3.10 The strategic target for affordable housing provision should be 35% to reflect the Mayor's Affordable Housing and Viability SPG.

Policy GG5: Growing a good economy

3.11 The Council's comments on this policy are as follows:

Criterion F should read:

'Promote, enhance and support London's rich heritage and cultural assets...'

Criterion G should read:

'Maximise London's existing and future public transport, walking, cycling and waterways network...'

Policy GG6: Increasing efficiency and resilience

3.12 Criterion B should be amended to incorporate the following wording:

'Ensure new buildings and infrastructure...'

4. Chapter 2: Spatial Development Patterns

4.1 The Council strongly objects to the provisions of paragraph 2.0.3, which states that the suburban pattern of development in outer London has significant potential for appropriate intensification. The phrase 'appropriate intensification' is not explained, however it is assumed that this refers to the Mayor's policy on the development of small sites.

4.2 As noted elsewhere in this response, the Council is extremely concerned that the Mayor's policy on small sites will lead to irreparable harm to the character of suburban areas in outer London boroughs like Hillingdon. A vague statement of this

nature will do little to address housing needs in a managed way and only serves to support inappropriate windfall development in suburban areas.

4.3 By its nature, windfall development cannot be managed through the allocation of sites. Whilst there may be limited scope for residential development on vacant sites, this paragraph should be balanced against the need to preserve the character of suburban areas in outer London. These areas are as much a part of London's urban grain as the intensely developed central areas and form an important buffer between rural areas outside of London.

Policy SD1: Opportunity Areas

4.4 The proposed new Opportunity Area for Hayes broadly reflects the level of growth proposed in the Hayes Housing Zone. The Council has not requested an Opportunity Area designation for Hayes and requests further discussions with the Mayor to agree the rationale and potential impact of this proposal.

Policies SD2: Collaboration with the wider south East and SD3: Growth locations in the Wider south East and beyond

4.5 The Council supports the Mayor's objections to Heathrow expansion. The Council, like the Mayor, supports the expansion of Gatwick in preference to Heathrow. It is therefore surprising to see that the policies in relation to the south east in SD2 and SD3 do not refer to Gatwick, which should be a principle strategic matter given the stance on Heathrow. Without policy support, or a clear vision of how an expanded Gatwick would be supported by London, the arguments for not supporting Heathrow are weakened.

4.6 The Council would expect the London Plan to reflect the aspirations of the Mayor, and lay the foundations for an expanded Gatwick that serves and benefits London as a whole.

Policy SD6: Town Centres

4.7 The Council places significant importance on the role that Hillingdon's town centres have in supporting the character of the borough and meeting the needs of residents', businesses and visitors. The priority given to town centres is therefore supported.

4.8 The reference to 'higher-density' in criterion C raises a particular concern. It begs the question of what constitutes higher density and often encourages tall buildings in locations that are out of context with the existing character of the area. High density residential development within town centres must only be allowed if it complements the character, role and function of the local centre.

4.9 The Council would prefer reference to making best use of land, taking account of the factors identified in the rest of the policy and policy D1 relating to properly understanding and responding to existing character and context.

Policy SD7: Town centre networks

Policy SD8: Town Centres Development principles and Development Plan Documents

Policy SD9: Town Centres: Local Partnership and implementation

Policy SD10: Strategic and local regeneration

4.10 As noted above, the Council welcomes policies that support the role and function of strong town centres, however these policies are too prescriptive and cannot be practically applied in decision taking. As such, they should be removed from the plan.

5. Chapter 3: Design

5.1 Whilst the Council welcomes the Mayor's focus on good design, the policies are overly prescriptive on design detail and do not provide a strategic focus. As such, they are inconsistent with the purpose of the London Plan, as outlined in paragraph 2.2 of this response. The draft plan should provide general design guidance, as a framework for Boroughs to develop their own locally specific design policies.

5.2 The Council is particularly concerned that pressure to meet increased housing delivery targets, outlined in chapter 4 of the draft plan, will result in a profusion of poor design. The draft plan should provide a policy statement to confirm that this will not be supported and confirm that good design is a key aspect of sustainable development.

Policy D1: London's form and characteristics

5.3 The policy outlines a series of largely agreeable design concepts, which are already considered to be established as best design principles in placemaking. The policy is not of strategic value, nor is it prescriptive enough to be implemented in planning decisions or plan making. On this basis, it is considered that Policy D1 should be removed.

5.4 Notwithstanding the above, there is a contradiction between the requirement to optimise density in Criterion A 1), with Criterion B 1) of the policy, namely to respond to the local context of the 'existing and emerging street hierarchy, building types, forms and proportions'. It will be very difficult to mitigate for the scale of the difference being proposed through new developments, with that of low-rise suburban development or the setting of heritage buildings. Furthermore, the requirements

attached to these high rise developments, namely on-site amenity, community infrastructure and car parking will pressurise the site coverage and the boundaries of the existing local environment.

5.5 An example should be provided in part 6 of Criterion A, to demonstrate what is meant by a positive reciprocal relationship between what happens inside the buildings and outside in the public realm.

5.6 In the event that the policy is retained, the Council's specific comments are as follows:

Criterion B, part 4 should be amended to:

'...respect and enhance heritage assets and their wider settings and utilise other architectural features that contribute to local character'

Paragraph 3.1.2 should be amended to:

'Their height, massing, footprint and site layout should help make public spaces coherent and reflect the existing townscape characteristics of the surrounding area.'

Paragraph 3.1.3 should include a reference to the quantitative air quality requirements.

Paragraph 3.1.4 should include a reference to site coverage and larger sites being able to contribute further to urban greening in terms of accessible green space.

Paragraph 3.1.9 should be removed.

Paragraph 3.1.10-11 should include reference to the use of sustainable transport to development sites, e.g. using canals where they abut development sites.

Policy D2: Delivering good design

5.7 Criterion A of this policy relates to the mechanisms used to identify areas with growth potential. As currently worded, the policy conflicts with Annex A1.2 and A1.3, which identify areas of growth potential without seeming to apply the criteria in this policy.

5.8 The policy is also an example of the London Plan operating beyond its remit of dealing with matters of strategic importance. Evidently, if the plan doesn't identify the areas of growth, then they are not matters of strategic importance. Therefore, having a generic policy of this nature is of little purpose.

5.9 Furthermore, these requirements will put more pressure on limited planning resources for additional framework plans and design review panels. These

requirements could also delay the planning process, if multiple plans are being produced to support the future strategic planning of one place.

5.10 A clear definition of 'optimised' should be included within the plan, to determine whether this means over and above the existing use and character of the area.

5.11 In relation to Criterion F, design review panels have a huge resource implication for individual boroughs and one would question if this was realistic. There is also no indication of how these standards would be monitored and maintained across London.

5.12 Specific comments on this policy are as follows:

Criterion A should include the requirement:

'Identify the current provisions of accessibility and inclusive design, and analyse all options to deliver high quality inclusive development.'

Criterion A, part 3 should include:

'Building form'

Criterion A, part 6 should be amended to:

'accessible open space networks, green infrastructure and water bodies'

Criterion A, part 7 should be amended to:

'to archaeology, historic development and the contribution made to local character by heritage assets (including an assessment of their significance and contribution to local character).'

Criterion A, part 8 should separate topography and hydrology.

Policy D3: Inclusive design

5.13 The principle of inclusive design is supported, however the policy requires the following amendments:

Criterion A, part 3 should be amended to:

'In developments where lifts are installed, including within blocks of flats, as a minimum at least one lift per core (or more subject to capacity assessments) should be a fire evacuation lift suitable to be used to evacuate people who require level step free emergency egress from the building. Carry-down

mechanical or similar interventions that rely on manual handling are not acceptable'

Policy D4: Housing quality and standards and S4 - Play and Informal Recreation

5.14 The intensive densification of development in London is putting increasing stress on existing open space. Many developments now place multi-storey buildings overlooking the amenity space in a courtyard areas, leading to significant areas of shadowing and a 'wind tunnelling' effect. These open spaces are often relied upon as the sole areas of recreation and enjoyment for new residents.

5.15 Neither Policy D4 or S4 makes any reference to the usability of the play and informal recreation. The quality of the play space is just as important, if not more so, than the quantity.

5.16 The policy also fails to set out adequate minimum private amenity space standards, which are necessary if high density housing is to realise the vision to become 'comfortable places of retreat'. The 5 sqm, with an extra 1 sqm, is seen as inadequate. The policy also fails to outline alternative locations for private amenity space, if the minimum size cannot be achieved within the dwelling layout, such as through the use of podium decks.

5.17 There is also no recognition of the hierarchy of spaces, which are required to provide a range of different amenity spaces, in order to encourage residents to participate in communal activities within the development. Defensible space and buffer zones, between the private dwellings and public domain, do not feature as part of the design standard.

5.18 Rooftop amenity space is also a restricted solution with regards to access and appropriateness for certain uses, as well as being restrictive for certain users such as young children, the elderly and people with certain disabilities. It should not be the primary space in a development and should only be viewed as windfall for central locations like town centres, where sites are substantially constrained. Urban and suburban locations should be able to provide adequate amenity at the lower levels of the building, if designed and approached correctly.

5.19 Paragraph 3.4.10 does not set out minimum overlooking/privacy distances, yet conversely promotes habitable rooms placed closer together, if greater ceiling heights are achieved. Whilst sunlight/daylight is an important aspect, so is a resident's right to a sense of privacy.

Policy D6: Optimising housing density

5.20 The approach fails to set out a range of appropriate density standards, which respond to a variety of characteristics and settings that reflect the diversification and different urban morphologies of London. A universal approach to density is inappropriate, particularly in light of the policies relating to context that are provided before this policy.

5.21 Criterion C of the policy contradicts the previously well established Sustainable Residential Quality standard to density, without providing any new evidence to suggest why the thresholds need to be this high to trigger good design.

5.22 Paragraph 3.6.1 of this policy overlooks the need to consider the existing character and context of the site, setting out a presumption in favour of high density development, regardless of site constraints.

5.23 Paragraph 3.6.4 fails to understand that strategic transport interventions will not always significantly improve the PTAL of an area, particularly where associated increases in local transport provision do not come forward. As currently worded, the delivery of major developments could be delayed whilst local transport improvements are negotiated, rather than using alternate mitigations.

5.24 Specific comments on this policy are as follows:

Criterion A, part 1 should include the addition of:

'And character'

Paragraph 3.6.1 should be amended to read:

'This will may mean developing at densities above those of the surrounding area on most sites. The design of the development must optimise housing density within the restraints of the site's context. A design-led approach to optimising density should be based on an evaluation of the site's attributes, its surrounding context and capacity for growth and the most appropriate development form...Historic areas will need special consideration and it may not be possible to apply this approach in these locations'

Policy D7: Public realm

5.25 The policy should include a reference to ensure that public realm includes green infrastructure to support rainwater management through sustainable drainage.

Policy D8: Tall buildings

5.26 Criterion B of the Policy indicates that tall buildings will affect the dispersal of pollutants. This suggests that all tall building applications should be accompanied by an air pollution dispersal model. The draft plan should clarify this point, as it would be an additional piece of work required from the applicant. As written, the policy becomes inconsistent and may result in different information being assessed by schemes referred to the Mayor.

5.27 There should also be reference to large/bulky buildings, as the use of a large footprint combined with even moderate height can be destructive in a townscape, if not given proper consideration. Overall, tall buildings should not change the overall character and appearance of the place.

5.28 Specific comments on this policy are as follows:

Criterion C, part 1d) should include reference to strategic views and their tests, as required in the NPPF.

Criterion C, part 1d) should make reference to the wider setting of the WHS and refer to views and the management plan policies for each area.

Policy D9: Basement Development

5.29 This policy is not a strategic issue, nor is it prescriptive enough to be of any value to local authorities. There is no definition of negative impacts and the supporting text introduces several gray areas which local authorities would have to navigate. This is not an issue that is refined to inner London or large scale basement development. The policy should be deleted and the issue of basement development left to individual Boroughs to address.

Policy D11: Fire safety

5.30 Whilst the Council recognises the need to improve fire safety, the policy itself addresses issues that are currently dealt with through building control.

5.31 The requirement for all major development proposals to submit a fire statement to the local planning authority is of most concern, as any information submitted to the local planning authority requires consideration and effective sign off from a qualified officer. The expertise in fire safety required to sign off these third person fire statements is unlikely to exist within a planning department and will ultimately lead to building control officers having to participate in the planning process, creating duplication of a role that already exists.

5.32 If the policy is to be retained, then Criterion B 2) should be expanded from the disabled to those who also 'require step free emergency egress'.

Policy D12: Agent of Change

5.33 The principle of the policy is supported, as it takes a more logical approach to moving the responsibility of mitigating noise impacts onto the new development, when mitigations can be more easily built in or funded.

5.34 The concern however is that in some scenarios, such as in Conservation Areas or on Listed Buildings, it will not be appropriate to introduce unsightly mitigation measures, such as acoustic fencing.

5.35 Furthermore, there needs to be more clarity on the engagement process between new and existing uses, to ensure that existing occupiers are consulted from the beginning and are not forced into making alterations that could negatively impact their viability.

5.36 Additional clarity would also be welcomed on the requirements of new uses being established adjacent to Strategic Industrial Land (SIL), where the current SIL use does not generate any noise.

Policy D13: Noise

5.37 The policy adds nothing to the existing framework around noise management and planning. Heathrow airport is a major source of noise that impacts hundreds of thousands of people across London and therefore should be considered a strategic and spatial issue that warrants prescriptive attention in the London Plan.

5.38 The Council would request that the noise issues around Heathrow are treated with specific attention, with a policy that clearly sets out the Mayor's intentions for any new or changes to existing airport activity. This should relate to the assessment methodology, as well as the triggers for mitigation.

6. Chapter 4: Housing

6.1 The Council strongly objects to the proposed housing target as set out in Chapter 4 of the draft plan. The Mayor has not provided any evidence to demonstrate that the proposed target can be delivered and the Council is concerned at the lack of engagement, particularly in relation to the approach on small sites, which was not communicated until a late stage in the process.

6.2 Fundamentally, the imposition of unachievable targets will encourage developers to bring forward proposals on sites that would not normally be granted planning consent and the significant erosion of the character of suburban areas. Experience tells us that a failure to demonstrate housing delivery results in the loss of planning appeals on Green Belt sites. These outcomes are completely unacceptable in Hillingdon.

Policy H1: Increasing London's Housing Supply

6.3 The proposed housing target for Hillingdon of 15,530 completions over a 10 year period, or 1,553 units each year, represents a three-fold increase over and above the current London Plan target of 559 units per annum. This level of housebuilding will not be achieved.

6.4 Over the last 4 years, an average of 749 units per year have been completed in Hillingdon. This average is expected to rise as a result of development coming forwards in the Hayes Housing Zone in the south of the borough, which is expected to deliver in the region of 4,000 - 5,000 units up to 2026 and beyond.

6.5 However, the draft plan provides no evidence or policies to demonstrate that such a substantial uplift can be delivered in a sustainable manner. Hillingdon has no means of accommodating the proposed level of new housing and the Council is concerned that policy H1 will result in uncontrolled housing development that is not supported by local infrastructure, has an adverse environmental impact and is detrimental to local residents.

6.6 The draft plan should acknowledge that housing delivery relies on the implementation of planning consents. Large sites in Hillingdon are currently being developed at a rate approximately 200 homes per annum. Whilst boroughs are able to grant planning consents and allocate sites for residential use, this is not sufficient to meet the proposed housing targets.

London's Housing need

6.7 The Council disputes the Mayor's assumptions regarding population growth and household size, which have resulted in a need to build 66,000 additional homes in London per annum. The Council is currently participating in a Strategic Housing Market Assessment for West London and will submit additional evidence on this point in advance of the examination process.

6.8 Borough delivery targets are informed by estimates of London's current and future housing requirements set out in the 2017 London Strategic Housing Market Assessment (SHMA). The SHMA provides estimates at the Greater London level only and considers London as a single housing market area.

6.9 The main results set out in the London SHMA are based on the 'central' scenario of the GLA's demographic projections, according to which, there is projected to be an annualised growth rate of 55,540 households a year. When backlog need, affordability and the likely rate of second and vacant homes are taken into account, the net requirement for new homes in London between 2016 and 2041 is estimated to be around 65,900 a year.

Household size

6.10 The Council is of the view that the household projections used in the London SHMA, for both Hillingdon and other London boroughs, are unrealistic. Household size was considerably larger in 2011 than it had been 1991, but despite this the modelled household size from 2011 onwards shows a fall. This does not seem

credible. To inform estimates of housing requirements in London, the GLA produces household projections using a model that replicates, as closely as possible, the operation of the most recent CLG model. A fall in household size is projected by both the GLA and CLG outputs, and this translates to a higher projected rate of growth in the number of households than the projected rate of growth of the population.

6.11 Population and household projections are intended to project forward past trends, and it is unlikely that 20 years' worth of increasing household sizes should yield a projection where household sizes now reduce. It is possible that the effect of an ageing population will lead to a greater number of older single persons or couples with no children and this would have an impact on average household sizes; but changes to household mix seem unlikely to lead to household sizes reducing to the extent currently projected by the GLA.

6.12 Average household sizes did reduce over the period 1971 to 1991, and these historic trends continue to have a significant influence on the rates of household growth currently published by CLG and used by the GLA projections. The Office for National Statistics (ONS) will be taking over responsibility for producing future household projections and aim to publish their 2016-based subnational household projections in summer 2018. The ONS has confirmed that they intend to discontinue the use of historic data from 1971 and 1981 and the trend will be taken from 1991. This is likely to mean that the trend in household size in Hillingdon and other parts of London will no longer be downward. The Objectively Assessed Need (OAN) calculation is sensitive to household size and consequently the publication of revised projections in the summer may well raise questions regarding the proposed housing targets.

Household type

6.13 The likelihood that household size is larger than modelled is supported by household type projections. The GLA 2016-based projections identify the overall number of households and also the types of households in each area. While, the overall household size is projected to fall, there is no evidence in the projected mix of household types that this is driven by smaller households such as single persons or childless couples. Neither of these groups is increasing sufficiently to explain a reduction in household sizes, and the proportion of single persons is actually projected to fall in many areas of London.

6.14 None of the larger household types (such as "households with two or more children" or "other - predominantly multi-adult - households") have seen a reduction in their average household size. The average size of each household type has remained relatively consistent for the last 20 years. Therefore trends in average household size are due to the overall mix of households in the area. The mix of households in Hillingdon and other boroughs is expected to include a higher proportion of households with children and 'other households'. This suggests that

household sizes are likely to increase and contradicts the GLA 2016-based projections showing falling household sizes.

6.15 If the household types set out in the GLA 2016-based projections are correct, the total number of households are likely to be overstated. Alternatively, if the total number of households is correct the household types are likely to be incorrect. Either way there appears to be a fundamental inconsistency between the average size of households projected and the types of households projected.

6.16 This inconsistency is fundamentally important, as the different approaches will amount to a considerable difference in household growth projected over the plan period. In establishing the London-wide OAN, the GLA has relied exclusively on the average size of households.

Policy H2: Small sites

6.17 The small sites target for Hillingdon is proposed to increase from an assumed rate of 178 units in the current plan to 735 units per annum. This represents 49% of the overall housing target of 1,530 units per annum and in simple terms is not considered to be achievable.

6.18 This aspect of the housing target was not consulted on as part of proposed methodology for the Mayoral SHLAA and Hillingdon was not briefed on the proposed approach in its subsequent discussions with the GLA. This represents a basic failure in the procedural aspects of undertaking the SHLAA. The proposed approach appears to have been introduced following an analysis of the results that were consulted on and a realisation that London's housing needs were unlikely to be met.

6.19 The starting point for the small sites target is an assumption that 1% of residential units within 800 metres of a railway station, town centre boundary or high PTAL level will deliver additional residential units in the form of residential conversions or intensification. The Council believes that the Mayor's assumptions regarding the number of units within these contours is incorrect, whilst the 1% per year assumption is not based on any sound evidence. This undermines the entire calculation for small sites in Hillingdon.

6.20 The Council is concerned that small site windfall development forms such a high percentage of Hillingdon's overall housing target as this cannot be controlled or managed through the allocation of specific deliverable sites.

6.21 The Mayor has not demonstrated that the proposed target for small sites can actually be delivered. Based on current delivery, which averages 178 units from small sites in Hillingdon, the Council believes that the proposed target will be missed

by a significant margin. Policy H2 is therefore little more than an unachievable aspiration.

6.22 Hillingdon is concerned that these circumstances will result in a failure to demonstrate a five year land supply and that this will be used by developers to support development on sites that would not normally be granted planning consent. The Council expects that the target will significantly increase the pressure on Green Belt land.

6.23 The Mayor's policy has been prepared to increase the number of residential conversions and infill development across London. These proposals often result in substandard, unsightly accommodation with inadequate levels of parking provision. In Hillingdon, the impact of the policy will be felt most strongly in suburban areas.

Impact on the suburbs

6.24 The Plan has neither appraised nor understood the 'suburban pattern of development' in London. Where the Mayor's approach has the desired effects it will have far reaching and very damaging consequences for outer London boroughs. This is particularly true of Hillingdon, which is one of the least developed. Hillingdon comprises a number of former mediaeval and post-mediaeval villages and small towns, which grew up along the roads leading out of London. Each has its own historic character and the sense of place and identity which their residents experience is very strong. Moreover each historic core has been designated a Conservation Area, with other Conservation Areas capturing the quality of their Victorian, or interwar, residential or canalside industrial suburbs.

6.25 There is already pressure to 'extend to convert', redevelop or infill in the back gardens of larger houses and this has often led to compromised designs, a loss of well detailed Victorian and 1920's houses. It has also led to a creeping reduction in, or loss of, gardens with their amenity, biodiversity and flood mitigation value, an increase in hard standings, and a relentless incremental erosion of the cherished streetscene.

6.26 With a strong presumption in favour of intensifying development of this type, within 800m of underground stations or town centres, in this ad hoc, incremental way, the pressures would be greatly increased and large swathes of the Borough would be hugely compromised in their character and amenity, with their history illegible to visitors and their green settings lost.

6.27 There is no clear protection for Conservation Areas or local heritage designations in these policies, nor for the settings of listed buildings, which should be taken into account when considering proposals for new development. 'Underused sites' could be interpreted as large family houses with gardens, whilst 'unacceptable

levels of harm to designated assets' would be difficult to determine and even more difficult to agree.

6.28 There are at least 17 Conservation Areas and numerous Areas of Special Local Character in this Borough, which would be directly affected by the Policy to target sites within a set radius of the Borough's seven town centres and fifteen stations. A catch all GLA Design Guide could never provide the subtlety necessary for preserving the character of the many towns and villages which make up outer London, whilst the specialist resource required by each borough to write individual design codes for all of these areas would be unrealistic and the task unattainable.

6.29 The Council is disappointed that the draft plan does not include a policy provision which allows Boroughs to introduce a presumption against development on back gardens. The protection of front and back gardens will help to protect and enhance the environment of London as a whole. As such, the provisions of policy 3.5 in the current plan, which supports this position should be carried forward.

Flood Risk

6.30 The Council is concerned that the flood risk implications of the small sites policy have not been fully assessed. Sites of this size are not sequentially tested in terms of flood risk and would have to be dealt with as part of the windfall sites process, which does not allow the LPA to plan for an appropriate level of mitigation.

6.31 Proposals for sites which are not classed as major development are not required to provide sustainable drainage information as part of their applications. In addition, sites under 1 hectare do not require Flood Risk Assessments and proposals for the extension or conversion of existing properties have limited requirements. Given these limited requirements and the scale of development expected to come forward from small sites, the cumulative impact of the proposed approach has the potential to significantly increase flood risk across the borough. In addition, the policy does not comply with the requirements of policy SI12 to manage current and expected flood risk in cost effective way and well as supply appropriate infrastructure and mitigation

Proposed approach to housing delivery

6.32 Unlike other aspects of the SHLAA, boroughs were not been given the opportunity to express their views on the Mayor's policy on small site delivery prior to the publication of the draft plan. Given the extent to which it is expected to contribute housing delivery, the approach needs to be subject to significant further scrutiny. Further discussions should take place with boroughs on the extent to which the small sites targets can be supported, before the draft plan progresses to the examination stage.

Policy H5: Delivering Affordable Housing

6.33 The Council does not support the Mayor's strategic target to deliver 50% of all new units across London as affordable housing. This target was included in the 2004 version of the London Plan and removed on the basis that it was not being achieved. The Council is unclear how this will be delivered, given the 35 % threshold set out in the Mayor's Affordable Housing and Viability SPD and Policy H6: Threshold Approach to applications.

6.34 The strategic target should reflect the 35% threshold contained in policy H6.

Policy H7: Affordable housing tenure

6.35 The Council does not agree with the provisions of Table 4.3, which identifies a requirement to deliver 55% of all new units as 1 bed properties. This does not reflect the needs in Hillingdon which are overwhelmingly for 3 and 4 bed family units. The supporting text should recognise the variation of need that exists across London, particularly the requirement for family accommodation.

Policy H12: Housing size mix

6.36 In relation to paragraph 4.12.3, two bed units should not be regarded as family housing. This will restrict the delivery of larger three and four bed units, exacerbate problems of overcrowding and ultimately force families to move outside of London. Furthermore, the Council does not consider that those wishing to downsize from larger properties should be encouraged as a means of meeting London's housing need.

Policy H13: Build to rent

6.37 Whilst it is acknowledged that Build for Rent has a role to play in housing delivery, this should not be at the expense of developing new homes for sale. Owner occupation is still the tenure that many aspire to and although it requires greater up-front expenditure, the ongoing housing costs are comparable and in some instances less than housing for rent.

Policy H15: Specialist old persons housing

6.38 The recognition of housing needs for older persons is broadly supported. However, Criterion C of the policy should set out standard(s) to which Use Class C2 and C3 housing should be designed and specified, e.g. Design Principles for Extra Care Housing, published by Housing LIN.

Policy H16: Gypsy and Traveller Accommodation

6.39 The proposed change in the definition of Gypsy and Traveller Groups, as set out in draft policy H16 differs significantly from that contained in the DCLG Guidance

document: Planning policy for traveller sites. There is no justification for a departure from national planning guidance on this matter and the DCLG definition should be retained in the policy.

Policy H18: Large-scale purpose built shared living

6.40 Shared living schemes, which are excluded from the minimum floorspace standards for residential accommodation, should not be regarded as a sustainable solution to addressing housing need.

6.41 The suggested minimum tenancy length of only 3 months is considered inadequate, with the standard assured shorthold tenancy requirement set at a minimum of 6 months, which itself is criticised as being too short to provide a stable living environment.

6.42 Whilst the difficulties providing affordable accommodation for individuals is acknowledged, there is concern that this type of housing, which does not meet current minimum standards, becomes normalised in the place of long-term sustainable solutions to housing shortages.

7. Chapter 5: Social Infrastructure

7.1 The delivery of social infrastructure is essential to support the ambitious housing targets that are put forward in the draft plan. The policies which support the retention of existing social infrastructure and the provision of new facilities are broadly supported. However, if boroughs are expected to deliver such high levels of growth, the Mayor should provide direct funding to ensure the delivery of essential health and education facilities.

Policy S3: Education and childcare facilities

7.2 The policy is supportive of new educational facilities which will assist in meeting the Borough's needs, but some requirements will not be practical on all sites and may conflict with other policies.

7.3 Criterion B, part 3 seeks to locate entrances and playgrounds away from busy roads. The policy should seek to achieve this where possible. Where no insurmountable highway objections exist, a balance needs to be struck between this and other site constraints (which often dictate layout, access, etc, particularly where expanding existing schools) and ensuring this does not encourage car use by locating entrances too far from public transport links, contrary to Criterion 2.

7.4 Parts 5 and 6 of criterion B encourage greater community use and sharing of facilities. Again, the policy should seek to achieve this where it is feasible and practicable to do so, in compliance with other policies of this plan.

7.5 Although desirable, this continues to present challenges with Sport England (SE). The extent to which this can be delivered varies significantly across sites. SE takes an uncompromising view to delivery of community use and associated facilities (eg, floodlighting, hours of use, etc). Their unsympathetic approach to site constraints and other policy requirements has proven problematic, increasing risk and delay (and costs) to the delivery of pupil places. A policy which is weighted too much in favour of community use over other policy considerations gives greater weight to SE's objections and could increase risk to future school developments.

7.6 Paragraph 5.3.12 seeks the co-location of education and housing facilities. Consideration has historically been given to the provision of housing above some of LBH's primary schools. This has been strongly resisted in the past due to child safeguarding concerns. For smaller facilities such as crèches and nurseries this may be more feasible but for schools the practicality of this would need to be very carefully considered. Furthermore, within Hillingdon at least, options for expansion and/or new schools are extremely limited. Therefore, notwithstanding housing need, it is important the educational use of sites is maximised to meet the need for pupil places. The provision of housing or other uses could restrict future expansion of schools.

Policy S4: Play and Informal recreation

7.7 Major development proposals should provide details of the daylight and overshadowing of amenity space and should be refused if there is excessive overshadowing. Major developments incorporating courtyards that are relied upon for amenity space should be able to demonstrate suitable comfort levels in windy conditions.

Policy S6: Public toilets

7.8 The term "Larger developments" used in criterion B of the policy is subjective. The policy should, instead, define the minimum floor area over which a 'Changing Places' cubicle must be provided.

8. Chapter 6: Economy

8.1 The Council would like to see a greater recognition of outer London's economy in the prosperity of London. Specifically, the plan should recognise the different factors that are necessary for economic growth in outer London, particularly the need for improved transport connections and car parking.

8.2 A key factor in the success of the logistics sector in Hillingdon and of Uxbridge as an outer London town centre with a significant amount of office space, is the proximity to other parts of London via the motorway network. The draft plan should recognise the essential nature of transport to the success of outer London's economy, both in terms of providing sufficient public transport links from inner

London and acknowledging that many residents travel to work in outer London centres by car.

8.3 It is important to note that many travel to work in Hillingdon from areas outside of London. Public transport options from these areas are limited and an appropriate level of car parking should therefore be provided.

Policy E1: Offices

8.4 The Mayor's support for the retention of office space and the specific support for existing office parks, including Stockley Park, is particularly supported. However the Council is of the view that significant investment in sustainable transport is required to maintain both Stockley Park and Uxbridge as successful outer London office locations.

8.5 Officers note the priority given to the delivery of Old Oak Common, however direct support should also be provided to secure the long-term prosperity of both Uxbridge town centre and Stockley Park, to prevent this expansion being to the detriment of other outer London employment areas.

Policy E2: Low cost business space

8.6 The provision of low cost business space in town centres is generally supported. However, the reality is that the delivery of these low value units is likely to be difficult to achieve. The policy should support the delivery of low cost units wherever possible, as part of the development of high value mixed use schemes.

8.7 Criterion B states that proposals that involve the loss of existing B1 floorspace should demonstrate that there is no reasonable prospect of the site being used for business purposes. A stronger line is required from the Mayor on this point. Instead the policy should state that the loss of B1 floorspace will not be supported where there is a demand for low cost business space. The loss of such space should only be supported in exceptional circumstances.

Policy E3: Affordable workspace

8.8 The provision of affordable workspace is generally welcomed and the Mayor should strongly support boroughs who are seeking to bring forward this scarce resource, where local evidence demonstrates that it is required. The policy should highlight the challenge of delivering affordable workspace at a scale that is attractive to investors. Delivery is most likely to take place as part of mixed use development schemes.

Policy E4: Land for industry, logistics and services to support London's economic function

8.9 As currently worded, the policy is rather muddled and overly prescriptive. Whilst the supply of the uses listed in the policy is a London-wide concern, they will not be relevant to many boroughs.

8.10 The wording should simply state that boroughs should make sufficient provision to meet the demand for floorspace, in accordance with locally identified needs. Boroughs should be encouraged to update employment land requirements on a regular basis.

Policy E5: Strategic Industrial Locations

8.11 The protection of Strategic Industrial Land (SIL) is broadly supported.

Policy E7: Co-location and substitution of land for industry, logistics and services to support London's economic function

8.12 The policy seeks to encourage the intensification of industrial activities and the co-location of residential and industrial uses. Whilst the proposed approach may be successful in some instances, industrial uses are rarely compatible with residential development.

8.13 The Council is concerned that the proposed approach could lead to highly complex, customised development schemes that do not have in-built flexibility to meet the needs of future occupiers. Once the applicant vacates the site, the vacant space must be able to meet the needs of the wider market. The Council is of the view that the policy as currently worded is far too complex and provides limited scope for boroughs to develop their own guidance. A two page policy does not provide a strategic framework on this matter.

Policy E9: Retail markets and hot food takeaways

8.14 The Council welcomes the Mayor's continued support for town centres as locations for retail and other uses that are likely to promote vitality and viability. Given the transformation that is currently taking place in the retail sector, policy criterion B, part 3 which seeks to bring forward additional comparison goods retail in metropolitan and major town centres, may be difficult to achieve.

8.15 Whilst concerns regarding the proliferation of hot food takeaways are understood, these uses are preferred to vacant shop units, which become magnets for anti-social behaviour. In this regard, the moratorium on A5 uses within 400 metres of a school is not supported.

Policy E11: Skill and opportunities for all

8.16 The issue of low pay is not a planning matter and should not be included in the draft plan.

9. Chapter 7: Heritage and Culture

9.1 The Council welcomes the Mayor's focus on heritage and conservation. However, there are serious concerns that the heritage related objectives will be undermined by the housing growth policies contained in other chapters of the draft plan.

9.2 It is imperative the heritage based planning policies seek to protect the wider settings of heritage assets; otherwise such assets will have their value eroded by nearby developments, which adversely impact on their settings and wider significance. This is of particular concern with regard to Conservation Areas and Areas of Special Local Character, which cumulatively cover large parts of Hillingdon.

Policy HC1: Heritage conservation and growth

9.3 Specific comments on this policy are as follows

9.4 Criterion A should read:

'...This evidence should be used for identifying, understanding, conserving and enhancing the significance of the historic environment and heritage assets...'

9.5 Criterion B, part 2 of the policy should refer to:

'.....structure, site or area...'

9.6 Criterion C should read:

'Development proposals affecting heritage assets and their wider settings should seek to conserve and enhance the historic environment and be sympathetic to the asset's significance. Development proposals should avoid harm to assets and make a positive contribution to local distinctiveness and character. Opportunities to enhance heritage assets and better reveal their significance should be considered at the commencement of the design process.'

9.7 Paragraph 7.1.4, should be amended as follows:

'..In addition to utilising this record, borough townscape and character appraisals, conservation area appraisals and management plans, Local Lists and gazetteers, local heritage guidance and heritage agreements should be used...'

9.8 Paragraph 7.1.7, heritage significance and setting should be defined as per the NPPF and this should be included in the glossary of the London Plan.

Policy HC7: Protecting public houses

9.9 The protection of public houses is supported, but changes are required to policies that seek to protect heritage assets.

10. Chapter 8: Green Infrastructure and Natural Environment

10.1 The policies in Chapter 8 seek to protect and retain Green Infrastructure and the natural environment and are generally support. The Council is, however, concerned that the proposed housing target for Hillingdon will result in the development of greenfield sites and the loss of green infrastructure. It is unclear how additional green infrastructure required to support housing growth will be delivered. Specific comments on individual policies are as follows:

Policy G1: Green Infrastructure

10.2 The Council welcomes the Mayor's support for the value of Green Infrastructure, but has limited resources to prepare a Green Infrastructure Strategy, which is set as a requirement in Criterion B of the policy. The policy should provide more flexibility for boroughs to decide if the production of a specific Green Infrastructure Strategy is necessary or appropriate.

10.3 Criterion B of the policy should be amended to simply state that Green Infrastructure Strategies should form part of borough-wide Local Plans. Criterion C should refer specifically to the all London Green Grid and the London-wide assets, deficiencies and key priorities for London's Green Infrastructure.

10.4 The Green Infrastructure policy should also recognise the links with other policies in the draft plan, particularly those related to waterways and flood risk.

Policy G2: London's Green Belt

10.5 The proposed wording of draft policy G2 is a matter of serious concern. The existing London Plan Green Belt policy mirrors the National Planning Policy Framework (NPPF) text; and the current NPPF/London Plan policy wording has been very effective in preventing inappropriate development in the Green Belt.

10.6 Any weakening of current Green Belt policy will not in reality result in more efficient use of Green Belt land for uses of community benefit (if this is the intention) but instead be the subject of speculative development proposals by the development industry. The Council therefore strongly objects to the change in wording of the policy. The above issue will be compounded if (as expected) increased unachievable housing numbers place further pressure on Green Belt land to be released.

10.7 Policy G2 is vague and lacks precision. It makes reference to 'enhancement', but does not define what this term means. Equally the policy makes reference to 'appropriate multifunctional uses', but does not define what these uses should be.

10.8 This part of the policy could therefore be open to interpretation by developers seeking to develop Green Belt sites and make the Council's position more difficult in resisting inappropriate development.

Policies G3 and G4: Metropolitan Open Land and Local green and open spaces

10.9 Policies G3 and G4 contain no strategic aspiration for the increase and provision of metropolitan open land (MOL). By its definition, MOL is a matter of strategic importance, and this is reflected in the text. Any changes to its boundary should be presented by the Mayor, either through a separate strategy or as part of the London Plan. However, Policy G3 [D] sets the criteria for which the boroughs are expected to designate MOL.

10.10 Policy G4 then sets the criteria for boroughs to consider 'local green and open space'. The Council is concerned that the draft plan does not take responsibility for the strategic matters and is effectively making all open space matters a local issue, despite acknowledging MOL is clearly a strategic matter.

10.11 Taking account of the above comments, policy G3 should be revised to clearly detail what the GLA will do to designate and safeguard MOL and how boroughs can support that process. In addition, reference should be made to the protection of Green Chains, which provide a natural resource across London.

Policy G5: Urban Greening

10.12 The Council supports the policy on Urban Greening and welcomes the direction provided. The erosion of urban greening has significant impacts for Hillingdon and the Council welcomes the direction taken. It is particularly important given that the intensification of development places extreme stress on existing urban green cover.

10.13 Table 8.2: Urban Greening Factors could be clearer in the explanation of the different 'Surface Cover Types'. These could be colour coded into groups to highlight the variation in factors.

Policy G6: Biodiversity and Access to Nature

10.14 The policy transfers a number of key responsibilities for strategic nature conservation from the GLA to boroughs.

10.15 Criterion A of the Policy states:

'Sites of Importance for Nature Conservation (SINC) should be protected. The greatest protection should be given to the most significant sites.'

10.16 It is not appropriate for the London Plan to pass on responsibility to boroughs to determine the scope of this part of the policy. If there are significant strategic sites, then the draft plan should identify them and then define what is meant by 'greatest protection'.

10.17 Criterion B sets the criteria for boroughs to review Metropolitan grade SINCS. These are determined because of their strategic importance for London and therefore it is entirely the responsibility of the GLA to identify, amend or remove Metropolitan grade SINCS.

10.18 Specific comments on this policy are as follows:

Criterion C should be amended to:

*'Where harm to a SINC (other than a European (International) designated site) is unavoidable, the following *hierarchical* approach should be applied to minimise development impacts.'*

Criterion C, part 1 should delete reference to *'special'*.

Criterion C, part 2 should be amended to:

'Minimise the impact and mitigate it by improving the quality or management of the rest of the site to achieve a net improvement in biodiversity.'

Criterion C, part 3 should be removed and replaced with:

'Achieve a net improvement in biodiversity off site through an appropriate compensation in exceptional cases where the benefits of the development proposal clearly outweigh the biodiversity impacts.'

10.19 Criterion D should be replaced with the following:

'All developments should achieve a net improvement in biodiversity with major development proposals accompanied by a statement of how biodiversity enhancements have been included within the development.'

Policy G9: Geodiversity

10.20 The policy adds little to existing framework on protecting geodiversity and should be deleted.

Chapter 9: Sustainable Infrastructure

11.1 Whilst many of the principles set out in this chapter are supported, additional burdens have been placed on boroughs and it is difficult to envisage how the practical implementation of policies could occur. As an example, policy SI1 relating to Improving air quality needs to be far more robust with clear targets and triggers for mitigation.

Policy SI1: Improving air quality

11.2 Whilst the Council is in general agreement with the intentions of the policy, it has so little substance that it is difficult to see how practical implementation would occur and therefore how the Plan would secure the necessary air quality improvements. Other than providing a statement of intent, the Mayor has little responsibility for implementation and passes a sizeable amount of work to boroughs.

11.3 The policy needs to be far more robust with clear targets and triggers for mitigation. The Council recommends an approach adopted by the previous Mayor with respect to achieving carbon reduction emissions. Development proposals should be able to demonstrate the baseline emissions and the necessary reductions.

11.4 If the solutions cannot be found onsite, then the policy should contain clear support for finding offsite solutions through an air quality improvement fund. The Mayor should invest time and resource in developing and implementing an appropriate mechanism, including formula for assessing contributions.

11.5 The policy introduces an ambiguous approach that complicates implementation significantly. Ultimately, it will be left to boroughs to provide the detailed interpretation. Evidence from the carbon reduction policies shows how a well articulated and clearly defined policy can be implemented in practice. The air quality policy should follow that successful approach.

11.6 The principle of improving air quality and reducing exposure in criteria A, part 1 and 2 are supported, although it is unclear how this will be achieved in practice. For example, the current air quality neutral guidance still allows for a degree of uplift in pollution. It is also unacceptable to believe that a large scale residential development (or any traffic generating proposal) would not lead to a further deterioration in existing poor air quality.

11.7 There is also a lack of clarity around the terminology of 'unacceptable risk', 'existing poor air quality' in criterion A1 and what constitutes 'high levels of exposure'.

11.8 Furthermore, part A1 does not contain any criteria to reflect the text in para 9.1.2, which states:

'...new developments must endeavour to maintain the best ambient AQ compatible with sustainable development'

11.9 Criterion A1 is entirely well intended but also virtually impossible to implement consistently and efficiently.

11.10 Criterion A2 is equally generic and lacking any substance. The current air quality neutral guidance allows for a degree of uplift in pollution which is not appropriate in Focus Areas which are identified as exceeding the EU limit values. Therefore, criterion A3 should contain a requirement for an Air Quality positive approach to apply to Air Quality Focus Areas as well as Opportunity Areas. The importance of improving air quality in AQ Focus Areas is supported in the text (para 9.18).

11.11 In addition, criterion A3 contains reference to Environmental Impact Assessment (EIA) development. There is a distinct lack of understanding as to what EIA development is in this context. EIA can be triggered by a range of matters, for various sized developments. Small, non traffic generating development could be EIA, whereas larger development with likely large amounts of traffic movement may not trigger EIA. the reference to EIA is therefore out of context.

11.12 Air quality assessments should be submitted with all major developments and not caveated as set out in criterion A5. All major development proposals should demonstrate sound approaches to air quality. Furthermore, mothballed sites that have been inactive and without traffic generation for many years could suddenly become active in areas of concern, without any consideration to traffic impacts. Finally, an air quality assessment should demonstrate an understanding of the impacts of transport emissions comparison between proposed and previous developments.

11.13 Specific amendments to this policy are as follows:

Criterion A, part 1 should provide clarification and include targets and triggers for mitigation.

Criterion A, part 3 should delete reference to environmental impact assessments and define 'large scale redevelopment areas'. The criterion should also define air quality positive and how air quality neutral relates to Criterion A, part 1.

Criterion A, part 5 should omit 'unless they can demonstrate that transport and building emissions will be less than the previous or existing use.'

Criterion A, part 6 should include the formula for seeking offsite solutions.

Policy SI2: Minimising Greenhouse Gas Emissions

11.14 The current London Plan policy on carbon emissions represents a clear and efficient approach. Implementation has been effective and in general, most developers and boroughs understand the requirements. There is no need to amend the approach.

11.15 Criterion A1 introduces zero carbon reduction in construction phases. Whilst well intended, it has no material or practical relevance to the planning stages of development. This is evidenced by the lack of explanation in the supporting text.

11.16 Criterion C2 introduces the possibility of a developer providing an offsite contribution, subject to an identified proposal with certain delivery. This aspect of the policy is fraught with implementation uncertainties. For example, developers have raised the possibility of funding global carbon schemes in lieu of a contribution to Hillingdon. This addition allows for a range of funding scenarios, for example global schemes, Carbon Trust schemes and GLA schemes.

11.17 If the developer is unable to find an on-site solution, they should not be able to manipulate the system and put pressure on Council resources to accept the identification of solutions that have far less control.

11.18 Specific amendments to this policy are as follows:

Criterion A, part 1 should delete reference to construction.

Criterion C, part 1 should be deleted.

Policy S13: Energy Infrastructure

11.19 Policy S13 places no responsibility on the Mayor to identify and assist in the delivery of new and improved energy infrastructure, particularly relating to low or zero carbon networks. There is a significant shift towards a position where individual boroughs are required to identify appropriate solutions.

11.20 As an example, Hillingdon has three heat map opportunity areas, but to date, no assistance has been provided by the GLA to unlock their potential. They remain strategic opportunity areas, yet have no strategic policy protection or incentives in this Plan.

11.21 If energy infrastructure is considered to be a strategic matter, criterion A of the policy should be far more robust with the plans the Mayor will put in place to deliver the necessary solutions.

11.22 Notwithstanding the above, criterion A introduces specific requirements for 'large scale development', which is an imprecise term and open to interpretation. In

any event, energy capacity within an area is not a material planning consideration and it is not appropriate for a development plan to make it so.

11.23 Criterion B of the policy requires the production of energy masterplans for 'large-scale development locations to establish the most effective energy supply solutions'. As above, 'large-scale' is not a defined term and therefore renders this part of the policy impractical. Additionally, there is no clarity as to who is expected to produce an energy masterplan or why.

11.24 Criterion D is unnecessary and is further evidence of a lack of strategic planning. Each major development is required to achieve zero carbon. Achieving this should be fully within the auspices of the applicant. It is entirely inappropriate to expect all major developments to have a communal heating system, particularly in opportunity areas where the lack of GLA policy assistance renders it unlikely that any connection infrastructure will come forward.

11.25 The Council is concerned that as a whole, policy SI3 has questionable aims and places too much emphasis on boroughs. Practical implementation also appears questionable in any event and there are overlaps with other energy policies.

11.26 Taking account of the above, the Council considers that the policy should be deleted.

Policy SI5: Water Infrastructure

11.27 The Council supports the inclusion of this policy and the principle that new development should seek to reduce water consumption. The Council already has policies in place to secure these reductions. The consideration of Integrated Water Management strategies proposed in paragraph 9.5.12 is supported. In relation to paragraph 9.5.13, there is a need for more transparency on who participates in the Mayor's Water Advisory Panel.

Policy SI6: Digital connectivity infrastructure

11.28 The Council does not consider that criteria A1, A2 and A3 are material planning considerations and it is entirely unclear who would discharge the responsibility imposed by this policy. These criteria should therefore be deleted from the policy.

Policy SI7: Reducing waste and supporting the circular economy

11.29 Criterion B of the policy introduces a requirement for the submission of further statements, but only on referable applications. It lists what is required in the statement, but gives no clarity as to how a decision maker will respond.

11.30 It is assumed that if the statement was not satisfactory then the scheme would be refused, but it is not clear what would make it satisfactory (no targets) or

how a decision would be made. Taking account of the above, criterion B of the policy should be deleted.

Policy SI8: Waste capacity and net waste self-sufficiency

11.31 As a result of the new apportionment methodology being proposed, Hillingdon has been allocated a significantly increased apportionment to manage from the current plan, both in terms of overall tonnes per annum (tpa) and as a proportion of all the waste proposed to be managed in London. Figure 1 outlines the changes being proposed:

Figure 1: London Borough of Hillingdon Apportionment Figures

	2021	2041
London Plan	245	-
Draft London Plan	423	450
% Change	↑ 72.6%	-

11.32 This significant apportionment increase is chiefly down to the amendments made to the waste apportionment methodology and not with the Borough’s ability to manage waste, with no new committed capacity having been developed and a net loss of industrial land occurring since the last London Plan.

11.33 Whilst the Borough’s projected waste arisings have increased marginally, when viewed against the overall increase in London’s arisings as a whole (Figure 2), this actually represents a smaller increase than the London average and means Hillingdon is now proportionally forecast to produce less of London’s waste.

Figure 2: London Borough of Hillingdon Arisings vs. London

	Hillingdon (2021)	London (2021)
London Plan	343	7,863
Draft London Plan	347	8,216
% Change	↑ 1.2%	↑ 4.5%

11.34 It is evident therefore that the apportionment increase has occurred artificially, through an alteration to the methodology, rather than any natural shifts in the indicators themselves.

11.35 Under the newly selected seven criteria, the focus of the methodology has shifted substantially to resemble a basic evaluation of how much industrial land there is in a given borough. Three of the seven criteria within the new methodology (Criteria 1, 5, 6) relate directly to the amount of industrial land within a borough, which represents 43% of the assessment.

11.36 Furthermore, there is also a positive correlation between the amount of industrial land within a borough and some of the remaining criteria used, such as Criterion 4 Road Network Capacity, with London's remaining industrial land tending to locate near the strategic road network for example.

11.37 Criterion 5 of the methodology as currently constructed is simply double counting the amount of industrial land within a borough, with the base number being the same total suitable industrial area used in Criterion 1. If the calculated constrained area of Criterion 5 is viewed to represent an area that is not suitable for waste facilities, then this figure should be used within Criterion 1 and Criterion 5 deleted. This would provide a more accurate reflection of how appropriate the industrial land being cited in Criterion 1 is for waste management facilities and prevent the double counting that is currently occurring.

11.38 Criterion 6 of the methodology is also a double count of the amount of industrial land within a borough, with the base number being the same total suitable industrial area used in Criterion 1.

11.39 Whilst the fundamental concept of locating development away from flood zones 2 and 3 is acknowledged, this same concept has historically led to less demand for these areas from high intensity uses and greater viability for lower value industrial uses, including waste facilities. A brief assessment of the Mayor's London Waste Map will highlight the large proportion of existing waste sites that exist within flood zones 2 and 3, namely within the industrial market areas of Lee Valley and Thames Gateway. In light of the existing land pressures and historical evidence to suggest that it is common to locate these uses in such areas, one would question whether it should be an apportionment restriction.

11.40 Furthermore, the substantial housing target increases for west London boroughs in Policy H1 have not been taken into account within the new apportionments. The requirements to both substantially increase housing supply and find new sites for waste management in west London are ultimately contrasting aims, with the conflict between residential uses and waste management facilities well documented.

11.41 In addition to the above, the absence of an apportionment figure for the Mayoral Development Corporations is a concern. Whilst the continued inclusion of the text within paragraph 9.8.7 is noted, without a fixed apportionment to be held to, there is little requirement for an MDC to do more than just safeguard existing sites. Noting the substantial increase in waste capacity that is required to meet the Mayor's own net self-sufficiency policy, MDCs should be proactively aiming to accommodate new waste capacity as part of the entire waste disposal authority.

Policy SI12: Flood Risk Management

11.42 The policy should cover the need for an upper catchment approach in areas not at risk, providing more benefit than focusing on just the receptors. The Regional Flood Risk Assessment supports and refers to this method.

11.43 There is no reference to the need for natural flood risk management and small scale interventions linked with Green Infrastructure, which will slow the flow to the major tributaries. In addition, the standards for managing flood risk where the receptor is more vulnerable should be higher.

11.44 Criterion C should reflect that there is still a hierarchy in approaches to mitigating residual risk. It could define and encourage that resistance is preferable, and those defenses which do not require human intervention, such as flood doors rather than barriers, and only then to any resilience methods i.e. recovery after the site is flooded.

11.45 Whilst the proposed Riverside Strategies referred to in paragraph 9.12.4 are broadly supported, the approach is too focused on those areas in the centre of London along the River Thames corridor. It is critical that the upper Thames catchment areas contribute to reducing flood risk to the lower catchment by "slowing the flow" of water, through natural flood management and addressing a number of the Water Framework Directive recommendations and the Thames River Basin Management Plan. These principles should be a critical element within this policy and linked with the provision of green infrastructure.

11.46 Paragraph 9.12.2 does not refer to the assessment of flood risk issues associated with policy H2. In addition, the RFRA does not assess the impact that small site development may have on the flood risk or other environmental factors, as they are not subject to such significant constraints. The RFRA should recommend appropriate constraints within those focus areas to mitigate any potential impact.

11.47 The Impact Assessment for Policy H2 does not recognise that there is an impact in flood risk terms and marks it as not applicable. However if a significant driver within the London Plan is to secure long term sustainable and appropriately designed housing, which encourages future green infrastructure to mitigate impacts,

encouraging smaller sites will not achieve this as these are below thresholds for current constraints on development to be considered.

Policy SI13: Sustainable drainage

11.48 The policy on sustainable drainage is generally supported. The Council particularly welcomes the improvements to drainage hierarchy, references to the Local Flood Risk Management Strategies, Surface Water Management Plans and the need to include green and blue living roofs.

11.49 The Council also welcomes the reference to refusing proposals that incorporate impermeable surfaces, although the phrase 'where appropriate' should be removed and replaced with 'unless they can be shown to be unavoidable'. In addition, the wording of paragraph 9.13.2 which states that 'developments should aim to achieve greenfield run-off' is disappointing. Lower rates of runoff are often achievable, but will not be offered by developers because of this statement. The policy should state that if greenfield rates are not achievable on site, then off site contributions should be considered, as outlined in the Plan's current approach to air quality.

11.50 In relation to paragraph 9.13.1, whilst the Local Lead Flood Authority (LLFA) leads on the issue of surface water management, there are also a number of other Risk Management Authorities that may have to contribute to resolving the issue. Flooding from sewers is not the responsibility of the LLFA but water utilities, who are also defined as Risk Management Authorities. These definitions should be amended.

11.51 Water quality should also be linked to the water body status of a particular watercourse, however to do this would require a clear understanding of the catchment and sub catchment areas, provided by the water company.

Policy SI14: Waterways-strategic role

11.52 The policy appears to have replaced the 'Blue Ribbon network' policy in the current version of the plan. The Blue Ribbon concept is widely understood and associated with the protection of waterways in London. As such, it should be retained throughout the plan.

11.53 The Council is of the view that the draft plan should contain a general policy for all the upper catchment areas, which seeks to slow the flow of water into the lower catchment area and also to maximise access to Green Infrastructure.

11.54 As currently worded, policy SI14 is contradictory with other parts of the text as it only refers to the River Thames and Marine Spatial Plans. However, paragraph 9.14.1 notes that the "term waterways does not only refer to the River Thames". Figure 9.6 shows numerous waterways. It would be helpful to show canals in a different colour.

11.55 The waterways are multifunctional assets however the Thames and London Waterways Forum does not appear to have a remit to discuss green infrastructure and environmental, cultural and community and drainage/ flood risk functions. The Council is of the view that there should be a Thames Policy Area to address the waterways not shown in Figure 9.7.

Policy SI5 Water Infrastructure

11.56 Criterion B of the policy states that Development Plans should promote improvements to water supply infrastructure. This may be difficult to achieve given the difficulties in obtaining long term demand and supply information for water use.

11.57 It is unclear how criterion D of the policy will be implemented. The Council already references the Thames River Basin Management Plan within its policies. The document is non specific in its recommendations and the draft plan sets a clear focus on the River Thames through the centre of London and not outer London boroughs. The expectations for outer London should be clearly defined as part of the policy.

11.58 Development Plans cannot provide an appropriate mechanism to support strategic waste water treatment infrastructure investment, without clear specific information from Thames Water over a long enough time frame. Feedback from water companies on this point is generally poor.

11.59 Criterion E of the policy should be refined to specifically state how key requirements 1 and 2 will be implemented, as boroughs have limited information on waste water capacity. This is partly due to the limitations of Thames Water modelling in outer London. The terminology in this section of the policy is also vague, for example it is unclear what constitutes adequate wastewater infrastructure capacity.

11.60 Although the general aim of this part of the policy is supported, the Local Flooding Authority is the only organisation reviewing drainage design currently and only on major developments, as required by government. To do more than this and require a review of all development drainage plans will require significant additional resource which may not be forthcoming.

Chapter 10: Transport

Policy T1: Strategic approach to transport

12.1 The Council was encouraged that the draft Mayor's Transport Strategy recognised that achieving an 80% modal shift from the private car to trips on foot, by cycle and public transport would be difficult to achieve in boroughs like Hillingdon. This should also be recognised in policy T1, as part of the Mayor's strategic approach to transport.

Policy T2: Healthy Streets

12.2 The Council supports mode shift initiatives towards active and public transport travel. It needs to be recognised, however, that the PTAL within the majority of the borough is generally very low, with 86% of the population situated within a PTAL of 2 or below.

12.3 A recent consultant's study advised that the majority of points of interest within LBH are located in areas which have limited access to public transport and therefore, in the absence of further investment, reliance on the private car is inevitable.

12.4 Hillingdon has satisfactory radial routes into Central London. However the study also identified that a proportion of Hillingdon residents work in places other than Central London, resulting in a greater need for a car given the poor north south public transport connections within Hillingdon and orbital routes to the surrounding boroughs. It also has to be borne in mind that 33% of employees within LBH come from outside of London, where the drive to work mode share is 87%.

12.5 Hillingdon Council particularly supports the Mayor's long-term 'Zero Vision' to reduce danger on the streets so that no deaths or serious injuries occur on London's streets

Specific comments on this policy are as follows:

Include a commitment to developing a more comprehensive, interactive and up to date database to inform the design and management of an increasingly safe street system. This information is essential to delivering the Mayor 'Zero Vision' target.

The policy should link back to Green Infrastructure strategies in policy G1. Healthy streets should incorporate elements of Green Infrastructure.

Policy T3: Transport capacity

12.6 The MTS expresses concern that a three-runway Heathrow would have severe noise and air quality impacts and put undue strain on the local public transport and road networks. It is noted that the MTS makes it clear that 'The Mayor will continue to oppose expansion of Heathrow airport unless it can be shown that no new noise or air quality harm would result'.

12.7 The MTS goes on to state that any expansion 'must also demonstrate how the surface access networks will be invested in to accommodate the resultant additional

demand alongside background growth". On this point, the London Plan could be cross-referred to the MTS as it is broadly aligned with the Council's own views.

12.8 The MTS also mentions that new Tube trains will be introduced from the mid-2020s on the Piccadilly Line serving Eastcote, Ruislip Manor, Ruislip, Ickenham, Hillingdon and Uxbridge and these new trains will be complemented by signalling and track improvements to enable faster and more frequent services. Whilst this investment is welcomed it is considered long overdue, taking into account the growth that is taking place in Hillingdon and the contribution this makes to the London economy it is considered that this investment should be prioritised and accelerated to support the London Plan aspiration.

Specific comments on this policy are as follows:

The London Plan should acknowledge and build upon the benefits of extending the Central Line to Uxbridge.

MTS also makes no mention of plans for new night buses in Hillingdon.

Policy T4: Assessing and mitigating transport impacts

The provisions of this policy are broadly supported.

Policy T5: Cycling

12.9 Consultants have carried out an assessment of cycling trips in Hillingdon to understand whether cycling is a genuine alternative to making the same trip by private car. The consultants found that cycling does not provide a viable alternative for a large proportion of trips within Hillingdon given that the overwhelming majority of journeys are quicker by car than cycling. The consultants found that only 1.4% of Hillingdon car driver commuter trips are cyclable. This information needs to be considered when finalising the London Plan Cycling Policy.

12.10 The Council considers that cycle parking standards should be amply provided and tailored to land use and location. It is agreed that the facilities should be located in close proximity to the entrances of buildings to provide convenience and choice for users. Cyclists should be certain that they always have a space for parking their bicycle but what the Council wants to avoid is "white elephants", where numerous unused parking stands result in adverse public reaction.

12.11 The policy could be amended so that it provides cyclists with the certainty that they have always have a space, whilst allowing the Council to be flexible in providing facilities in response to (anticipated) demand. The plan needs to recognise that only 1.4% of Hillingdon car driver commuter trips are cyclable.

Policy T6: Car parking

12.12 Officers are concerned that the proposed car parking standards do not relate to the travel patterns of residents in the Borough for the following reasons:

- LBH has extremely poor public transport accessibility (percentage of PTAL by area) in comparison to all other London boroughs, typified by:
 - 86% of the residential population living within an area of PTAL less than 2 (defined as 'poor' by TfL); and
 - 51% of the residential population living within an area of PTAL between 1 and 1b (defined as 'very poor' by TfL);
- An assessment of journeys between key destinations has determined that public transport does not provide a viable alternative for the vast majority of trips. Analysis shows that 89% of trips being quicker by car than public transport;
- An assessment of 2,506 Points of Interest within the Borough (shops, doctors surgeries etc.) concludes that 46% are located in areas with low public transport access.
- In comparison with other parts of London, Hillingdon has a significantly higher number of points of Interest in PTAL 3 areas or below and the lowest number of points of interest in areas of PTAL 4 or above.
- Car ownership in Hillingdon is higher than in any other London borough, correlating with the lowest average PTAL;
- An assessment of cars owned vs mode of travel to work indicates that higher parking standards do not necessarily translate to lower car use for work and therefore congestions during peak periods;
- Amongst all other London boroughs, Hillingdon has a significantly higher number of residents working outside of Central London. This explains the need for car ownership and in LBH when compared to other boroughs;
- LBH is the London borough with the highest amount of residents travelling to work by car, reflecting the number of residents that work outside of London and the limited availability of public transport.

12.13 Without a step change in public transport availability, there will always be a greater need for residents to travel by car when undertaking trips both in and around the borough, in comparison to many other London boroughs. An appropriate level for employment generating uses is essential to maintain economic prosperity, particularly in outer London. As a result and taking account of the above points, the Mayor of London's proposed car parking standards are not considered to be appropriate for Hillingdon.

12.14 Criterion B of the policy appears to contradict policies D3 and D5. A privately owned accessible vehicle for many disabled people is their only means of getting out and about. Within 'car-free developments', the M4(3) Wheelchair Accessible and Wheelchair Adaptable units should have provision for accessible parking.

Policy T6.1: Residential Parking

12.15 In regards to criteria G1 and G2, on the basis that only 3% of parking bays would need to be accessible at the outset, the mechanism by which an accessible bay could be requested by a future occupier, once the development is occupied, should be set out. Unless an arrangement of this type is made legally binding, it would likely get lost in the mists of time.

12.16 In regards to criterion H2, there are significant numbers of disabled people who rely on their own car or similar accessible vehicle as the sole mode of transport. If parking bays are not allocated to specific dwellings, then there would be no guarantee of a parking space upon their return home. Parking bays should be allocated to specific dwellings.

Policy T8: Aviation

12.17 The Council broadly supports criteria C and D of the Policy, although there is a need for much greater clarification and a more robust position. For example, Heathrow Airport Ltd has already formulated an argument that the generic targets set out in the Policy, i.e. no additional noise, will be met for Heathrow expansion. Criterion D should therefore contain the minimum specific parameters which would need to be met to allow for expansion.

12.18 The Council strongly opposes HAL's position, but it does highlight the uncertainty of a highly complex and technical matter within a highly ambiguous policy framework.

12.19 Furthermore, the Council is surprised to see no reference to the Mayor's support for Gatwick in criterion D, which would reflect the views expressed in the text in 10.8.7.

12.20 There could be confusion over criteria F and G. For example, F refers to changes in airport operations and aircraft movements which must take account of their environmental impacts, G refers to making better use of existing airport capacity. As an example, G could be interpreted as an extension of the current operating measures at Heathrow, in the early mornings, or the introduction of mixed mode, even partial, or the landing of certain types of aircraft on one particular runway as making better use. There needs to be more clarity on what G is intended to cover.

12.21 The Council would welcome an express commitment from the Mayor that there would be no support in the air traffic numbers at Heathrow Airport.

13. Conclusion

13.1 In conclusion, the London Borough of Hillingdon strongly objects to many of the key policies put forward in the draft London Plan, particularly the proposed housing targets and the policy relating to small sites. The Council would welcome the opportunity to discuss the points raised in this response with representatives from the Greater London Authority and can confirm that it would like to participate in the examination hearing sessions.

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DYNAMIC PURCHASING VEHICLES FOR CHILDREN'S RESIDENTIAL HOMES, SEN PROVISION AND INDEPENDENT FOSTERING AGENCIES

Cabinet Member	Councillor David Simmonds CBE
Cabinet Portfolio	Deputy Leader of the Council Education and Children's Services
Officer Contact(s)	Wendy Ukwu / Vanessa Strang - Finance
Papers with report	None

HEADLINES

Summary	<p>This report seeks Cabinet's permission to enter into an Access Agreement and Call-Off from the WLA Dynamic Purchasing Vehicles for the following services:</p> <ol style="list-style-type: none"> 1. Independent Fostering Agencies led by Barnet Council; 2. Special Educational Needs for independent and Non Maintained Special Schools led by Brent Council; 3. Children's Residential Homes led by Ealing Council. <p>Hillingdon is currently the Lead Borough for the West London Alliance framework for Independent Fostering Agencies, which officially expires in April 2018 and will be replaced by the Independent Fostering Agencies Dynamic Purchasing Vehicle (DPV) led by the London Borough of Barnet.</p> <p>The aim is to ensure that there is good quality, locally available provision for Hillingdon Borough's Looked After Children (LAC) and Children with Special Educational Needs (SEN), which represents value for money and is compliant with Public Contract Regulations 2015. These DPV's will be used by the 9 WLA boroughs that carry out part or all of the statutory duties relating to Children.</p>
Putting our Residents First	This report supports the following Council objective of: <i>Our People</i> .
Financial Cost	<p>The costs of the Dynamic Purchasing Vehicle will be met from the West London Alliance Budget. This new approach will ensure that the Council is purchasing services through a controlled route rather than through spot purchases.</p> <p>It is anticipated that the DPV will improve the brokerage and placement process and ensure that these are achieved at the best</p>

	cost, which will assist the Council with managing its costs within the base budget. It will also provide more certainty of future costs as the expectation is that the DPV rate will not increase significantly over the life of the contract.
Relevant Policy Overview Committee	Children, Young People and Learning Policy Overview Committee
Relevant Ward(s)	All

RECOMMENDATIONS

That Cabinet:

1. **Agrees to enter into an Access Agreement and Call-Off from the WLA Dynamic Purchasing Vehicles for Children’s Residential Homes, SEN Provision and Independent Fostering Agencies.**
2. **Authorises Officers to access, call-off and award WLA contracts, as indicated in Table 1 in the report, from the Dynamic Purchasing Vehicle.**
3. **Authorises Officers to select the various Call-Off options for the award of contracts in accordance with the rules of the Dynamic Procurement Vehicle (DPV), and also for any spot purchase awards made off the DPV where a suitable placement could not be found.**

Reasons for recommendation

Hillingdon Council has a number of statutory duties relating to the provision of social care and Special Education services to children and young people. This includes ensuring a sufficiency of suitable services locally, where services are provided on the basis of an assessment of individual need.

There has also been a need to shape and manage the market and to ensure that a set of standard contract terms are issued. There will also be significant purchasing power with the high number of authorities utilising this.

London Borough of Hillingdon is committed to providing local high quality placements for our Looked After Children (LAC) and Children and Young people with SEN. The West London Alliance DPV is established in a way, which means we can work with our existing local supply chain to bring them on to the arrangement, as well as continuing to develop new providers based in the Borough.

The Council would be at risk of failing to achieve its statutory duties to meet assessed need if the proposed arrangements are not put in place.

To help reduce any risks that might be associated with the use of spot purchased services, Procurement will:

- Issue an OJEU Contract notice indicating the services which will be procured and award criteria to be used;
- Ensure that services are registered, as required, by Ofsted and/or equivalent
- Seek competitive quotes wherever possible;
- Sign individual Dynamic Purchasing Vehicle Agreements with providers.
- Replace the current IFA Framework which will expire on 31 March 2018.

Information will be provided to Children and Young People's Services about the number of spot purchases which have been made off the DPV.

Policy Overview Committee comments

None at this stage.

SUPPORTING INFORMATION

This report seeks the approval of Cabinet for the London Borough of Hillingdon to enter into an access agreement to enable Hillingdon Council to call off from the West London Alliance's (WLA) Dynamic Purchasing Vehicle for the provision of the following services to meet the Council's statutory duties relating to the provision of the indicated DPV's as set out in Table 1 below:

Table 1

Children's DPV	Lead Authority	Please indicate with an 'X'
Independent Fostering Agencies	Barnet	X
Special Educational Needs for independent and Non Maintained Special Schools	Brent	X
Children's Residential Homes	Ealing	X

The aim of the proposal is to improve the quality of local and national based supply for all Participating Boroughs for Children & Young People's provision and ensure that value for money is delivered for Hillingdon Council.

Where it may not be possible to procure a service due to lack of capacity or other reason, spot purchases may be required if no suitable Placement can be found on the DPV. This report also seeks for the decision to make spot purchases to be delegated to officers as stated in the recommendations.

The stated WLA Lead Boroughs have procured three Dynamic Purchasing Vehicles for the listed services under the EU Procurement Directives, which will become live on the 19th of March 2018. "DPV" is an updated term for a Dynamic Purchasing System (DPS) which reflects allowances made for Social Care services under the Light Touch Regime within the Public Contracts Regulations 2015.

The DPV Procurement will achieve the following outcomes:

- Ensuring a broad geographical spread of services, primarily across West London and nationally;
- Increasing the supply base and ensuring that minimum quality standards have been met so that Providers can apply to join and access the DPV;
- Increase the choice of provision for Children and Young People;
- Promote Small and Medium Enterprises;
- Develop a broad range of service provision captured by the Service Levels within each Category to meet the needs of Children and Young people;
- Ensure flexibility of provision to increase/decrease levels of support based on each Child's individual need;
- To develop stability in the market over a longer term period and have a consistent approach to purchasing across boroughs, where there are agreed terms and conditions, specifications, a suspension and barring policy and a developed contract performance management approach;
- To maximise the value and usage of CarePlace, our e-Brokerage tool.

Permission has been sought to use an alternative bespoke procurement portal Curtis Fitch (CF) software application as an e-Procurement platform for the purpose of e-sourcing, and supplier relationship management. The Lead WLA Boroughs have entered into a Licence agreement for a term of 6 years in addition to a Training Agreement for up to ten (10) days of training for WLA and Lead Borough staff.

The total cost of this approach to the WLA boroughs will be £14,050, which will pay for the new system and relevant training. This will be funded from the existing WLA budget and no further contribution will be required from the WLA boroughs.

Financial Implications

The costs of the Dynamic Purchasing Vehicle will be met from the West London Alliance Budget. This new approach will ensure that the Council is purchasing services through a controlled route rather than through spot purchases.

It is anticipated that the DPV will improve the brokerage and placement process and ensure that these are achieved at the best cost, which will assist the Council with managing its costs within the base budget. It will also provide more certainty of future costs as the expectation is that the DPV rate will not increase significantly over the life of the contract.

RESIDENT BENEFIT & CONSULTATION

The benefit or impact upon residents, service users and communities?

The Benefits of a DPV Approach are:

- Competition – A DPV creates a high level of competition with the potential to drive down prices and reduce local authority spend.

- Quality control - Suppliers must first be 'accredited' against a set of quality criteria dictated by the partners before being granted entry to the DPV utilised from the existing WLA budget and no further contribution will be required from the WLA boroughs. This will ensure that only high quality suppliers with strong financial checks are permitted to submit bids.
- Transparency - Councils would have complete visibility over the end-to-end process of procuring placements, a full transparent audit trail. The open, transparent nature of a DPS can also build trust and certainty for suppliers.
- Increased flexibility - Unlike a Framework, a DPV is utilised from the existing WLA budget and no further contribution will be required from the WLA boroughs. They can respond quickly to sudden demand or supply changes in the market, e.g. a school or home closing or losing the required Ofsted rating and allow new suppliers and services to be added through the life of the DPV.
- Value for money – Councils will be able to demonstrate that all services procured represent maximum value for money.
- Admin consolidation - The electronic, automated nature of a DPV means that suppliers can tender without having to invest hours of time completing forms; it's easier and less time-consuming for them to bid.
- Non-Compliance with Regulations Establishing DPV's will deliver compliance with the Children & Families Act 2014, Care Act 2014 and Public Contracts Regulations 2015 – Lowered risk of legal challenge as a result of having the DPV's and helps LA's deliver Best Value Duty. The WLA have also created Terms and Conditions for Residential and IFA which could potentially make savings in the future due to current copyright restrictions. Additionally a non-member authority would need to be granted a licence from London Councils to use the contract document, which in practice means becoming an LCS member authority.
- Multiple Services, one application – Providers allowed to bid once to offer more than one category of services on a DPV, reducing evaluation and bidding time and costs for all parties.

Non-Cash Benefits of Establishing DPV's in West London are:

- Officer Time - Reduced time and cost for LA's on procurement, contract management and quality assurance.
- Continued Partnership - The valuable partnership and collaborative working that has formed across the region is maintained longer term
- Contracts and Specifications – Shared contracts and specs for each category across West London reducing waste in the supply chain and ensuring consistency in terms, outcomes and standards.

- Electronic Contracting - Contracts could also be issued on the DPV if developments to CarePlace were made to support this functionality which is currently being explored, saving officer time.
- Placement Purchasing - Streamlining the way in which we buy placements Via CarePlace which also delivers robust market intelligence and analysis
- Market Shaping – Providing Commissioners with improved intelligence regarding capacity in the market to undertake strategic market management and shaping for future proofing.
- Contract Performance Management – Opportunity to establish a shared contract management approach/function with contract monitoring information will be available to all.
- Competition and demand - Reduced competition across borders which can distort value for money achieved by individual partners.
- Benchmarking - Quality and cost, outcomes learning.
- Provider Efficiency - Reduced time and cost for suppliers at procurement, referral and contract monitoring stages.
- Safeguarding and Market Intelligence - Information sharing and an ongoing partnership relationship can be developed electronically and more efficiently with early warning across LA's of market challenges or supplier issues.
- Sector Influence - Leverage regionally and nationally with providers and with DfE, OFSTED, NASS, ICHA and NAFFP.
- Utilising an e-brokerage tool (West London's CarePlace system) within the DPV will ensure that the Council secures 'best market' prices for children's placements. The e-brokerage function introduces an electronic process for securing competitive market prices from providers.
- It is anticipated that the combined purchasing power of 9 boroughs, and potentially others, will have a beneficial impact on prices and that it may also stimulate the market.
- The tendering process which has been carried out by Ealing/Brent/Barnet Council on behalf of the WLA is in accordance with the Council's Contract Procedure Rules, UK and EU legal requirements and is governed by the Public Contract Regulations 2015.

CORPORATE CONSIDERATIONS

Corporate Finance

Corporate Finance has reviewed the report and concur with the financial implications set out above noting that the use of the DPV to purchase Children's placements is intended to secure value for money for the Council.

Legal

Regulation 34 of the Public Contracts Regulations 2015 (the Regulations) provides that contracting authorities may use a dynamic purchasing system for commonly used purchases the characteristics of which, as generally available on the market, meet their requirements.

The West London Alliance, is establishing three dynamic purchasing vehicles (DPV's) to procure Independent Fostering agencies, Special Educational Needs for independent and Non Maintained Special Schools and Children's Residential Homes, with Barnet, Brent and Ealing Council's respectively acting as the central purchasing bodies as defined by the Regulations. Under the Regulations the Council, as a member of the West London Alliance, may acquire works, supplies and services, or any one or more of them, by using a DPV operated by a central purchasing body, and where it does so it shall be deemed to have complied with the Regulations to the same extent that Ealing Council has done.

The Borough Solicitor therefore confirms that there are no legal impediments to the Council procuring social care and Special Education services to children and young people under the DPV's established by the West London Alliance.

Other service areas

Corporate Procurement supports the recommendation for Permission to enter into an Access Agreement and Call-Off from the WLA Dynamic Purchasing Vehicles for Children's Residential Homes, SEN Provision and Independent Fostering Agencies.

BACKGROUND PAPERS

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