



HILLINGDON
LONDON



CABINET

To all Members of the Cabinet:

Date: THURSDAY, 10 APRIL 2025

Time: 7.00 PM

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

Meeting Details: The public and press are welcome to attend and observe the meeting.

For safety and accessibility, security measures will be conducted, including searches of individuals and their belongings. Attendees must also provide satisfactory proof of identity upon arrival. Refusal to comply with these requirements will result in non-admittance.

This meeting may be broadcast on the Council's YouTube channel. You can also view this agenda online at www.hillingdon.gov.uk

Ian Edwards, Leader of the Council
(Chair)

Jonathan Bianco, Deputy Leader of the
Council & Cabinet Member for Corporate
Services & Property (Vice-Chair)

Martin Goddard, Cabinet Member for
Finance & Transformation

Susan O'Brien, Cabinet Member for
Children, Families & Education

Jane Palmer, Cabinet Member for Health
& Social Care

Eddie Lavery, Cabinet Member for
Community & Environment

Steve Tuckwell, Cabinet Member for
Planning, Housing & Growth

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Putting our residents first

Lloyd White
Head of Democratic Services
London Borough of Hillingdon,
Phase II, Civic Centre, High Street, Uxbridge, UB8 1UW

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:

10 April 2025 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 exempt information under Part 1 of Schedule 12A to the Local Government Act 1972 (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 relevant Select 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

2 April 2025
London Borough of Hillingdon

Agenda

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Cabinet Reports - Part 1 (Public)

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| 15 | Uxbridge Golf Course and Haste Hill Golf Course (Cllr Eddie Lavery) -
REPORT TO FOLLOW | |

The reports in Part 2 of this agenda are not for publication because they involve the disclosure of information in accordance with Section 100(A) and Part 1 of Schedule 12 (A) to the Local Government Act 1972 (as amended), in that they contain exempt information and that the public interest in withholding the information outweighs the public interest in disclosing it.

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

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Agenda Item 1

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Agenda Item 2

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Minutes & Decisions

CABINET

7pm, Thursday, 13 March 2025

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



Decisions published on: 14 March 2025

Decisions come into effect from 5pm, 21 March 2025 or as stated

Cabinet Members Present:

Ian Edwards (Chair)
Jonathan Bianco (Vice-Chair)
Martin Goddard
Susan O'Brien
Jane Palmer
Eddie Lavery
Steve Tuckwell

Officers Present:

Tony Zaman, Chief Executive
Mark Braddock, Democratic Services

1. APOLOGIES FOR ABSENCE

All Cabinet Members were present.

2. DECLARATIONS OF INTEREST IN MATTERS BEFORE THIS MEETING

No interests were declared by Members present.

3. TO APPROVE THE MINUTES OF THE LAST CABINET MEETING

The minutes and decisions of the Cabinet meeting held on 20 February 2025 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

It was confirmed that items of business marked Part 1 would be considered in public and those marked Part 2 in private.

5. COUNTER FRAUD STRATEGY 2025-2028

RESOLVED:

That the Cabinet approve the Counter Fraud Strategy for 2025 to 2028 as set out in Appendix A.

Reasons for decision

The Cabinet Member for Finance and Transformation introduced a refreshed Counter Fraud Strategy for the period 2025 to 2028, noting that the Team had achieved savings of £10.1 million in the current financial year, with notable success in areas such as housing tenancy, temporary accommodation, business rates, and social care. Despite past successes, fraudulent activity in the Borough had not decreased, necessitating continued investment in the team. The Cabinet Member noted that the three-year strategy outlined key objectives, including maximizing loss prevention and recovery, restricting opportunities for fraud and corruption, creating a strong deterrent, and promoting a culture of zero tolerance towards fraud. The strategy also aimed to enhance the Council's reputation through visible counter fraud activities and maintain organisation-wide fraud risk awareness. The team were thanked for their achievements.

The Leader of the Council expressed surprise at the £10 million worth of fraud identified and emphasised the importance of continued investment in the counter fraud team's work.

Cabinet, therefore, approved the Counter Fraud Strategy for 2025 to 2028, which set out the strategic approach to fraud prevention and detection across the Council.

Alternative options considered / risk management

Cabinet could have considered not to have an up-to-date strategy, but noted this would not be compliant with new legislation on failure to prevent fraud and reasonable fraud prevention procedures that need to be in place.

Relevant Select Committee	Corporate Resources & Infrastructure
Expiry date for any scrutiny call-in / date decision can be implemented (if no call-in)	Cabinet's decisions on this matter can be called in by a majority of the select committee by 5pm, Friday 21 March 2025. If not called-in, Cabinet's decisions can then be implemented.
Officer(s) to action	Alex Brown
Directorate	Finance
Classification	Public - <i>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.</i>

6. HOUSING FORWARD INVESTMENT PROGRAMME 2025/26 AND 2024/25 REVIEW

RESOLVED:

That the Cabinet:

- 1) Note the delivery of the 2024/25 HRA Works to Stock Programme set out in the report, which has provided essential upgrades to the Council's housing stock, along with higher energy efficiency standards whilst improving the quality of life of tenants.**
- 2) Agree the HRA Works to Stock Programme for the 2025/26 financial year, as set out in the report.**
- 3) Delegate to the Corporate Director of Place, the authority to:**
 - a) Utilise existing internal or external framework agreements or develop new LBH framework agreements for Cabinet approval, to enable the effective delivery of appropriate works, tenders, and contracts.**
 - b) Approve project specific works completed using an approved LBH framework or term contract.**
 - c) Release capital funds for the specific works, as set out in the programme and strictly within approved budgets.**
 - d) Agree minor variations to specific projects within the programme, subject to agreement from the Cabinet Member for Corporate Services & Property.**
 - e) Make any other operational decisions required to implement the works agreed by the Cabinet.**
- 4) Agree that relevant portfolio Cabinet Members receive quarterly summary updates on progress delivering the programme, providing capital releases and also capital spend to date for monitoring purposes and, furthermore, that any contracts entered into by the Director via framework agreement exceeding £750k be reported to Cabinet for information as part of the budget monitoring report.**
- 5) Agree that any variations to the overall programme or approved programme budget be reported to Cabinet for approval in the first instance.**

Reasons for decision

The Cabinet Member for Corporate Services & Property introduced a report on the Forward Housing Investment Programme, highlighting various works and projects, including roofing programmes, window replacements, new kitchens and bathrooms, installation of 1900 new boilers, passenger lift upgrades, door entry and access controls, electrical upgrades, and fire door sets. The programme aimed to improve

the estate and the lives of residents, particularly through better insulation, reduction of draughts and damp, and more efficient boilers to save residents money.

The Leader of the Council remarked that it was pleasing for the Council to implement this programme of works alongside a substantial investment in property acquisition. The Leader noted that whilst many social housing providers were limited to either improving existing properties or acquiring new ones, Hillingdon Council was able to do both.

Cabinet, therefore, agreed the significant investment planned for the Council's housing stock over the coming year and noted what had been achieved over the last year. Cabinet also provided the necessary authority for efficient decision-making in this service area.

Alternative options considered and rejected.

Cabinet could have decided to amend the specific works programme as set out in the report and/or delegations.

Relevant Select Committee	Corporate Resources & Infrastructure
Expiry date for any scrutiny call-in / date decision can be implemented (if no call-in)	Cabinet's decisions on this matter can be called in by a majority of the select committee by 5pm, Friday 21 March 2025. If not called-in, Cabinet's decisions can then be implemented.
Officer(s) to action	Gary Penticost
Directorate	Place
Classification	Public - <i>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.</i>

7. COUNCIL BUDGET - 2024/25 BUDGET MONITORING PERIOD 10

RESOLVED:

That the Cabinet:

- 1. Note the latest forecast outturn position for both the General Fund and HRA 2024/25 revenue and capital budgets;**
- 2. Approve the list of revised fees and charges relating to the HRA for 2025/26 as set out in Appendix 4 and explained in paragraphs 30 and 31.**

Reasons for decision

The Cabinet Member for Finance & Transformation introduced the monthly budget monitoring report, detailing the projected outturn for the Council's finances for the current financial year ending 31st March 2025, as of month 10. The report indicated a further overspend of £900,000 since month 9, leading to a projected aggregate

overspend of £11 million for the full year 2024/25. This would result in reserves of £23.6 million to carry over into the next year. The overspend was mainly due to increased costs in children, families, and education and corporate services, offset by reductions in other areas.

The Cabinet Member advised that the Housing Revenue Account maintained parity with the budget, despite an adverse variance in rental income and increased operating costs, offset by reduced capital financing costs. Capital expenditure in the Housing Revenue Account was £164.3 million, £43.4 million less than budgeted due to project delays. The Dedicated Schools Grant whilst projecting an in-year deficit, showed an improvement of £1.4 million from month 9. To close, the Cabinet Member then advised Cabinet on proposed in-year changes to the fees and charges for the Housing Revenue Account.

The Leader of the Council remarked that the report assured residents of the Council's sound financial management and sustainability. The Leader noted progress in managing the Dedicated Schools Grant deficit and stated that the Council was weathering financial pressures better than many other local authorities.

Cabinet, therefore, noted the latest financial position and agreed a revised set of fees relating to the Housing Revenue Account (HRA).

Alternative options considered and rejected

Cabinet could have chosen to vary the proposed changes to the HRA fees but considered this would impact on the HRA business plan for 2025/26 and thus alter HRA reserves by the end of the year.

Relevant Select Committee	
Expiry date for any scrutiny call-in / date decision can be implemented (if no call-in)	Cabinet's decisions on this matter can be called in by a majority of the select committee by 5pm, Friday 21 March 2025. If not called-in, Cabinet's decisions can then be implemented.
Officer(s) to action	Richard Ennis / Matt Davis / Andy Goodwin
Directorate	Finance
Classification	Public - <i>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.</i>

8. PUBLIC PREVIEW OF CONFIDENTIAL REPORTS

RESOLVED:

That Cabinet note the reports to be considered later in private and Part 2 of the Cabinet agenda and comment on them as appropriate for public information purposes.

Reasons for decision

The Leader of the Council introduced the report which provided a public summary of the matters to be discussed in the private part of the Cabinet meeting later, increasing the Council's transparency.

Alternative options considered and rejected

As set out in the public Cabinet report and also within the private report.

Relevant Select Committee	
Expiry date for any scrutiny call-in / date decision can be implemented (if no call-in)	This matter is not for call-in, as noting only.
Officer(s) to action	Mark Braddock
Directorate	Corporate Services
Classification	Public - <i>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.</i>

9. COMMISSIONING OF INFORMATION, ADVICE, GUIDANCE AND WELLBEING SUPPORT SERVICES TO RESIDENTS

RESOLVED:

That the Cabinet accepts the following tenders for support services following a procurement process:

1. To the Carers Trust Hillingdon & Ealing for the provision of Carer Support Service (ASC) for 5 years at the value of £519k p.a. from 4th April, 2025 and at a total value of £2,595k for the initial contract period, and an optional up to 3 years extension period for the value of £1,557k.
2. To Hillingdon Mind for the provision of a Mental Health Early Intervention/ Prevention Programme (ASC) for 5 years and an optional up to 3 years extension period from 4th April 2025 at the value of £230k p.a. and at a total value of £1,150k for the initial contract period and £690k for the extension period;

3. To Hillingdon Advice Partnership, a collaboration of the following providers Age UK Hillingdon Harrow and Brent (lead provider) in partnership with 4 locally based and leading not for profit providers who are Nucleus, Disability Advice and Support Hillingdon (DASH) and Bell Farm Christian Centre, for the provision of Information Advice Guidance and Wellbeing for adults (Lot 1) (ASC) for 5 years and an optional up to 3 years extension period from 2nd June 2025 and at a value of £749,831.32 p.a. and at a total value of £3,749,157 for the initial contract value and £2,249,494 for the extension period;
4. To People Potential possibilities (P3) for the provision of Information Advice Guidance and Wellbeing for young people/ care leavers and homelessness support (Lot 2) (Children's Services and Housing Needs) for 5 years and an optional up to 3 years at a value of £164,802 p.a. and at a total value of £824,010 and £494,406 for the extension period;
5. To People Potential Possibilities (P3) for the provision of Information Advice Guidance and Wellbeing for children and families (Lot 3) (ASC and Children's Services) for 5 years and an optional up to 3 years from 2nd June 2025 and at a value of £136,152 p.a. and at a total value of £680,760 and £408,456 for the extension period;
6. To mobilise the new contracts set out above, that Cabinet agrees to short-term extensions to the existing contracts at a value of £189.5k for the services currently provided as set out in Appendix A.

That Cabinet authorises two direct contract awards as follows:

7. To Hillingdon Women's Centre for the provision of domestic abuse provision offering one-to-one casework for women in crisis, empowering them to make safe and informed decisions to reduce the risk of harm for them and their children. The support enables women to become safe, supported, and independent when faced with Violence Against Women and Girls (VAWG) and abuse for a three-year period from 1st April 2025 to 31 March 2028 and at a value of £30k p.a. and at a total value of £90k for the period;
8. To Home-Start Hillingdon for the provision of emotional and practical support to parents of children up to and including 2 years of age for a three-year period from 1st April 2025 to 31st March 2028 at a value of £120k p.a. and at a total value of £360k for the period;

That in respect of Healthwatch Services, Cabinet agrees to:

9. Delegate authority to the Leader of the Council, in consultation with the Cabinet Member for Health and Social Care, to authorise any contracts following the retendering of the Healthwatch Hillingdon Service contract for a five-year contract with the option to extend for up to a further three years.

Reasons for decision

The Cabinet Member for Health & Social Care moved a number of recommendations in the report, agreed by the Cabinet, to commission strategic contracts and direct awards for Information, advice, guidance, and wellbeing support from the voluntary sector to promote active, resilient communities and reduce pressure on statutory services. Cabinet also delegated decisions on Healthwatch services. Additionally, ensure a smooth transition in some service areas, short-term extensions of existing contracts were agreed. The Cabinet Member outlined the importance of, and success with, the Council's work with the voluntary sector.

Alternative options considered and rejected

Cabinet could have decided to cease support to the voluntary sector, but this was rejected due to their valuable early intervention and preventative support in Hillingdon. Bringing services in-house was also discounted as the voluntary sector was better placed to support communities and cost-effective. Not delegating authority for a new Healthwatch contract was not recommended as it could extend interim arrangements and risk breaching statutory responsibilities.

List of short-term contract sub-decisions made by Cabinet, in relation to its primary decision no. 6 set out in Appendix A of the confidential report:

- 1. Information, Advice, Guidance and Wellbeing for Adults (Lot 1) (ASC) – noting the budget for the four contracts will mobilise into one contract:**
 - a) To Age UK Hillingdon, Harrow, and Brent for the provision of a range of services to older people including information, advice, guidance and wellbeing advice; opportunities to socialise and connect (including digitally) for a period of two months from 1st April 2025 and at a value of £83.33k;**
 - b) To the Citizens Advice Hillingdon for two Contracts: the provision of benefits, debt, employment, housing and consumer advice, information, and guidance; and a separate mental health needs focused service; for a period of two months from 1st April 2025 and at the values of £47.5k and £10k;**
 - c) To the Bell Farm Christian Centre for the provision of information, advice, guidance, and wellbeing support for West Drayton community for a period of two months from 1st April 2025 and at the value of £16.67k;**
 - d) To the Disability Advice and Support Hillingdon (DASH) for the provision of advice, information, guidance, and wellbeing support with a particular focus on income maximisation for people with a disability for a period of two months from 1st April 2025 and at the value of £12.5k;**

- 2. The following short-term contract extensions relating to the mobilisation lead in time in relation to the advice service for families Lot 3:**

- e) To P3 for family advice for a period of two months from 1st April 2025 and at the value of £12.83k;
- f) To HACS for advice for families where their child has autism for a two-month period from 1st April 2025 and at the value of £6.67k;

Relevant Select Committee	Children, Families & Education & Health and Social Care Select Committees
Expiry date for any scrutiny call-in / date decision can be implemented (if no call-in)	Cabinet's decisions on this matter can be called in by a majority of the select committee by 5pm, Friday 21 March 2025. If not called-in, Cabinet's decisions can then be implemented.
Officer(s) to action	Sarah Baker
Directorate	Adult Social Care & Health
Classification	Private - <i>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 in accordance with Section 100(A) and paragraph 3 of Part 1 of Schedule 12 (A) to the Local Government Act 1972 (as amended).</i>

10. DISABLED FACILITIES GRANT & ADAPTATIONS CONTRACTS FOR LIFTS

RESOLVED:

That the Cabinet:

1. Accept the tender from Handicare Accessibility Ltd for the provision of the lot 1 – stairlifts (straight) supply & installation to the London Borough of Hillingdon for a period of 3 years with options for a further 2 years at an estimated value of £112k per annum (£560k over 3+2 years).
2. Accept the tender from Handicare Accessibility Ltd for the provision of the lot 3 – stairlifts (curved) supply & installation to the London Borough of Hillingdon for a period of 3 years with options for a further 2 years at an estimated value of £258k per annum (£1,290k over 3+2 years).
3. Accept the tender from Wessex Lift Company Limited for the provision of the lot 7 – vertical through floor lifts - supply & installation to the London Borough of Hillingdon for a period of 3 years with options for a further 2 years at an estimated value of £128k per annum (£640k over 3+2 years).
4. Accept the tender from Prism UK Medical Ltd for the provision of the lot 9 – ceiling track hoists - supply & installation to the London Borough of

Hillingdon for a period of 3 years with options for a further 2 years at an estimated value of £55k per annum (£275k over 3+2 years).

Reasons for decision

The Cabinet Member for Corporate Services & Property introduced a report to Cabinet, of which the recommendations were agreed, to award four contracts via the YPO stairlifts, step lifts, vertical through floor lifts and ceiling track hoists framework relating to the supply and installation of straight stairlifts, curved stairlifts, hoists, and through floor lifts, funded by the Housing Revenue Account for Council-owned properties and the Disabled Facilities Grant for eligible non-council properties.

Alternative options considered and rejected

Cabinet considered the alternative options as set out in the report, noting that without such contracts in place, there would be delays in installing adaptations for residents.

Relevant Select Committee	Corporate Resources & Infrastructure
Expiry date for any scrutiny call-in / date decision can be implemented (if no call-in)	Cabinet's decisions on this matter can be called in by a majority of the select committee by 5pm, Friday 21 March 2025. If not called-in, Cabinet's decisions can then be implemented.
Officer(s) to action	Sarah-Jane Bartlett / Merrick Knight
Directorate	Place
Classification	Private - <i>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 in accordance with Section 100(A) and paragraph 3 of Part 1 of Schedule 12 (A) to the Local Government Act 1972 (as amended).</i>

11. PATHWAYS FOR YOUNG PEOPLE - EXTENSION OF EXISTING ARRANGEMENTS FOR STAYING CLOSE AND SUPPORTED ACCOMMODATION PROVISION

RESOLVED:

That the Cabinet agree to extend current arrangements for Staying Close and Supported Accommodation services while planning re-commissioning options in the next 12 months, as follows:

- a) For Staying Close, agree an extension of services to:**
 - i) Emlea Property Services for support services from 1st April 2025 until 30th September 2025 at the cost of £0.261m, with the optional extension until 31st December 2025 at an additional cost of £0.131m.**
 - ii) Central and North West London NHS Foundation Trust (CNWL) for the “Staying Close” project expansion to support 18 to 21 year olds to provide psychological emotional and therapeutic support to care-experienced young people for the months of August and September 2025 (£0.011m) with an optional extension option until 31st December 2025 (£0.017m).**
 - iii) Further, note that the cost of the extensions are fully covered by existing ringfenced grant and that the project team in place to deliver this is also paid 100% from the existing grant and;**
 - iv) Authorise the Corporate Director of Children’s Services to agree any optional contract extensions set out, in consultation with the Cabinet Member for Children, Families & Education.**
- b) For Block Supported Accommodation (formerly called Semi Independent Living) agree contract extensions for 12 months for continued support services to:**
 - i) YMCA St Paul’s Group (YMCA) for the provision for Young People’s Semi-Independent Living support services from 1st April 2025 until 31st March 2026 at the value of £0.482m, which includes the support services and forecasts the rents.**
 - ii) People Potential Possibilities (P3) for provision for Young People’s Semi-Independent Living support services from 1st April 2025 until 31st March 2026 at the value of £1.200m, which includes the support services and forecasts the rents.**

Reasons for decision

The Cabinet Member for Children, Families & Education introduced a report and recommendations, which Cabinet agreed, to extend the current arrangements for

supported housing and wrap-around provision for Hillingdon’s young people to ensure continuity of services, support, and compliance with statutory requirements. The Cabinet Member also noted that there was an Ofsted requirement for such accommodation to be regulated.

Alternative options considered and rejected

Alternative options were considered by Cabinet as set out in the report, noting that discontinuing such services would have negative service, statutory and financial consequences.

Relevant Select Committee	Children, Families & Education
Expiry date for any scrutiny call-in / date decision can be implemented (if no call-in)	Cabinet’s decisions on this matter can be called in by a majority of the select committee by 5pm, Friday 21 March 2025. If not called-in, Cabinet’s decisions can then be implemented.
Officer(s) to action	Alex Coman / Sally Offin
Directorate	Children’s Services / Finance
Classification	Private - <i>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 in accordance with Section 100(A) and paragraph 3 of Part 1 of Schedule 12 (A) to the Local Government Act 1972 (as amended).</i>

12. CORPORATE PROPERTY PROGRAMME 2024/25: APPROPRIATION OF RYFIELD CARETAKERS HOUSE, UXBRIDGE FOR ADDITIONAL HOUSING

RESOLVED:

That the Cabinet:

- 1) Declares that Ryfield Caretakers House is surplus to requirements. The Property is shown edged red on the plan at Appendix 1;
- 2) Authorise the appropriation of the Property from the General Fund to the Housing Revenue Account, subject to a valuation, and subject to Secretary of State consent under Academies Act 2010;
- 3) Authorise officers to apply to the Secretary of State for the Department of Education for consent to appropriate the property and;
- 4) Delegates authority to the Corporate Director of Place, in consultation with the Cabinet Member for Corporate Services & Property, to make

any further necessary decisions with regard to the project's implementation

Reasons for decision

The Cabinet Member for Corporate Services & Property introduced a report and recommendations, which Cabinet agreed, to appropriate the Ryfield Caretakers House on Ryfield Avenue in Uxbridge to the Housing Revenue Account which would enable the property, therefore, to be used for much needed local housing purposes.

Alternative options considered / risk management

Alternative options were considered as set out in the Cabinet report.

Relevant Select Committee	Corporate Resources and Infrastructure
Expiry date for any scrutiny call-in / date decision can be implemented (if no call-in)	Cabinet's decisions on this matter can be called in by a majority of the select committee by 5pm, Friday 21 March 2025. If not called-in, Cabinet's decisions can then be implemented.
Officer(s) to action	Julia Thompson
Directorate	Place
Classification	Private - <i>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 in accordance with Section 100(A) and paragraph 3 of Part 1 of Schedule 12 (A) to the Local Government Act 1972 (as amended).</i>

13. FLEET MAINTENANCE AND REPAIR CONTRACT

RESOLVED:

That the Cabinet agrees to extend the current contract with Dennis Eagle Limited for the provision of Full Maintenance and Repair to the London Borough of Hillingdon Fleet at Harlington Road Depot for a one-year period from May 2025 to May 2026 and at an estimated cost of £1,831,535, noting an increase of £140,335 (7.7%).

Reasons for decision

The Cabinet Member for Finance & Transformation introduced a report and recommendations, which Cabinet agreed, to extend the current contract for the full maintenance and repair of the Council's fleet of 295 that are used by a wide range of operational departments including Waste Services, Highways Maintenance,

Passenger Transport and Green Spaces to provide essential services to the residents of Hillingdon.

Alternative options considered and rejected

Cabinet considered alternative options as set out in the report, including retendering the service and insourcing, but these were discounted for commercial and cost reasons.

Relevant Select Committee	Corporate Resources & Infrastructure
Expiry date for any scrutiny call-in / date decision can be implemented (if no call-in)	Cabinet's decisions on this matter can be called in by a majority of the select committee by 5pm, Friday 21 March 2025. If not called-in, Cabinet's decisions can then be implemented.
Officer(s) to action	Steve Gunter / Michelle Kenyon
Directorate	Finance
Classification	Private - <i>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 in accordance with Section 100(A) and paragraph 3 of Part 1 of Schedule 12 (A) to the Local Government Act 1972 (as amended).</i>

14. MINOR PROPERTY TRANSACTION - AGREEMENT WITH WEALDSTONE FOOTBALL CLUB

RESOLVED:

That the Cabinet:

- 1) Authorises the grant of a 3-year Exclusivity Agreement with Wealdstone Football Club on the terms and conditions as detailed in the report, whilst the club undertake further due diligence and secure additional funding.
- 2) Delegate all necessary decisions in relation to the agreement to the Corporate Director of Place, in consultation with the Cabinet Members for Planning, Housing & Growth and Corporate Services & Property to make any further necessary decisions regarding the completion of the agreement.
- 3) Agree that if the deal does not proceed for whatever reason, then to consider all alternative options for the two parcels of land and report back to Cabinet.

Reasons for decision

The Cabinet Member for Corporate Services & Property introduced a report and recommendations, which Cabinet agreed, in respect of Wealdstone Football Club and the Council entering into an exclusivity agreement on 2 parcels of land, one adjacent to the former Master Brewer site on Western Avenue and the second, Gutteridge Farm, so the Club could further develop their proposals for a new stadium and training facilities to bring benefits to the area and Borough as a whole.

Alternative options considered and rejected

The Cabinet considered the alternative options set out in the report, such as leaving the sites vacant or marketing them for alternative use, but discounted them at this time.

Relevant Select Committee	Corporate Resources & Infrastructure
Expiry date for any scrutiny call-in / date decision can be implemented (if no call-in)	Cabinet's decisions on this matter can be called in by a majority of the select committee by 5pm, Friday 21 March 2025. If not called-in, Cabinet's decisions can then be implemented.
Officer(s) to action	Izak Loggenberg
Directorate	Place
Classification	<i>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 in accordance with Section 100(A) and paragraph 3 of Part 1 of Schedule 12 (A) to the Local Government Act 1972 (as amended).</i>

15. MINOR PROPERTY TRANSACTION - VOLUNTARY SECTOR LEASE FOR THE ENDEAVOUR SEA SCOUTS

RESOLVED:

That Cabinet authorise the surrender and regrant of the lease on a higher rent, as detailed in this report and instruct the Corporate Director of Place to complete the appropriate legal documents in consultation with Legal Services.

Reasons for decision

The Cabinet Member for Corporate Services & Property introduced a report and recommendations, which Cabinet agreed, to make the necessary property lease decisions to enable the Endeavour Sea Scouts to utilise the new Scout Hut built on

Moorfield Road, Cowley and benefit from the Council's established policy of discounted leases for the voluntary sector.

Alternative options considered and rejected

Cabinet considered the alternative options in the report, which included not to grant the lease negotiated or consider alternative uses, but discounted them.

Relevant Select Committee		Corporate Resources and Infrastructure
Expiry date for any scrutiny call-in / date decision can be implemented (if no call-in)	Cabinet's decisions on this matter can be called in by a majority of the select committee by 5pm, Friday 21 March 2025. If not called-in, Cabinet's decisions can then be implemented.	
Officer(s) to action	Jacob Davis	
Directorate	Place	
Classification	Private - <i>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 in accordance with Section 100(A) and paragraph 3 of Part 1 of Schedule 12 (A) to the Local Government Act 1972 (as amended).</i>	

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

No further items were considered by Cabinet.

The meeting closed at 7.23pm

Internal Use only*	Implementation of decisions & scrutiny call-in
When can these decisions be implemented by officers?	Officers can implement Cabinet's decisions in these minutes only from the expiry of the scrutiny call-in period, unless otherwise stated in the minutes above, which is: 5pm, Friday 21 March 2025 However, this is subject to the decision not being called in by Councillors on the relevant Select Committee. Upon receipt of a valid call-in request, Democratic Services will immediately advise the relevant officer(s) and the Cabinet decision must then be put on hold.
Councillor scrutiny call-in of these	Councillors on the relevant Select Committee shown in these minutes for the relevant decision made may request

decisions

to call-in that decision. The call-in request must be before the expiry of the scrutiny call-in period above.

Councillors should use the Scrutiny Call-in App (link below) on their devices to initiate any call-in request. Further advice can be sought from Democratic Services if required: [Scrutiny Call-In - Power Apps](#) (secure)

Notice

These decisions have been taken under The Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012.

This Cabinet meeting was also broadcast live on the Council's YouTube channel [here](#) for wider resident engagement.

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@hillington.gov.uk

Democratic Services: 01895 250636

Media enquiries: 01895 250403

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PROPOSAL TO AMALGAMATE GRANGE PARK INFANT AND NURSERY SCHOOL AND GRANGE PARK JUNIOR SCHOOL - SPRING 2025

Cabinet Member & Portfolio	Cllr Susan O'Brien - Cabinet Member for Children, Families and Education
Responsible Officer	Julie Kelly – Corporate Director of Children Services
Report Author & Directorate	Abi Preston – Director of Education & SEND
Papers with report	Appendix 1 – Hillingdon Infant and Junior Amalgamation Policy – September 2022 Appendix 2 – Grange Park Public Notice Appendix 3 – Statutory Proposal to amalgamate Grange Park Infant and Nursery School and Grange Park Junior School Appendix 4 – Frequently Asked Question – Proposed Amalgamation of Grange Park Schools Appendix 5 – Academic Research of the benefits of Amalgamation

HEADLINES

Summary	<p>The Governing Board of Grange Park Junior School and the London Borough of Hillingdon, with the support of the Governing Board of Grange Park Nursery and Infant School, are consulting on a proposal for the two schools to amalgamate to form a single three-form entry foundation primary school for children aged 3 to 11 years with effect from 1st September 2025, with a total published pupil number of 630. In order to amalgamate the 2 schools and create a Primary school, the Council are proposing to close the Infant and Nursery school, and Governing Body of the Junior school are proposing to extend their age range.</p> <p>Following the DfE statutory process, approval is being requested (Local Authority as the decision-maker) to amalgamate the two schools.</p>
<p>Putting our Residents First</p> <p>Delivering on the Council Strategy 2022-2026</p>	<p>This report supports our ambition for residents / the Council of: An efficient, well-run, digital-enabled council working with partners to deliver services to improve the lives of all our residents</p> <p>This report supports our commitments to residents of: Thriving, Healthy Households</p> <p>In line with the Council's Amalgamation Policy.</p>

Financial Cost	The eventual loss of the lump sum income usually available per school phased over 2 years. However, in the long-term the two schools will benefit from economies of scale efficiency savings.
Select Committee	Children, Families and Education Select Committee
Ward(s)	Belmore, All

RECOMMENDATIONS

That Cabinet:

- 1) Consider the responses from the consultation based on the proposals set out;
- 2) Approve the closure of the Grange Park Infant and Nursery school, and the proposal by the Governing Board of the Junior school to extend their age range, to amalgamate Grange Park Infant and Nursery and Grange Park Junior Schools from September 2025.

Reasons for recommendation

The Council, and schools are expected to consider the long-term vision of each school, ensure the best outcomes for our children and young people, and the sustainability of schools. Part of this responsibility is to continue to:

- improve and provide the best possible education and care for every child;
- provide an excellent working environment and experience for staff; and
- support and work with their local community

With the headteacher of Grange Park Infant and Nursery School retiring in Summer 2024, Hillingdon Council required the governing bodies of both schools to consider amalgamation in line with the Hillingdon Council policy in Appendix 1. There is currently an interim Headteacher in post at Grange Park Infant and Nursery School for one academic year, and a permanently employed Headteacher of Grange Park Junior school.

Alternative options considered / risk management

- **Option 1:** Do nothing – do not amalgamate the two schools and instead recruit a new permanent Headteacher for Grange Park Infant School
 - This would not support the schools to be more financially secure, especially in light of the reduction in demand for Primary school places, and would not be in line with the amalgamation policy
- **Option 2:** Agree to amalgamate Grange Park Infant and Nursery School, and Grange Park Junior School with an alternative implementation date set out below:
 - January 2026
 - April 2026

- September 2026
 - This would cause unnecessary delay and incur additional expenditure to continue to employ an interim Headteacher. Responses from the consultation were supportive of an amalgamation date at the start of the new academic year in September 2025.
- **Option 3:** Propose to close both schools to open a primary school with a new DfE number.
 - This option would create greater uncertainty for families, children and staff if both schools closed and a new one was created. In addition, it would create additional work for the schools in relation to HR processes and is not in line with the amalgamation policy.

Significant engagement with both schools, and with wider stakeholders including families has been instrumental in managing and mitigating any risks. A statutory process has also been followed to avoid any risk related to compliance with our statutory obligations.

Democratic compliance / previous authority

Cabinet is the body to consider school organisational changes where there are representations/objections.

Select Committee comments

The Children, Families and Education Select Committee considered this matter at its meeting on 20 March 2025 and notes that the majority of the responses to the consultation to amalgamate Grange Park Infant and Nursery School and Grange Park Junior School are positive. There are a range of benefits that the proposed amalgamation will provide such as a better learning experience for the children, a more consistent journey through their primary education and the sharing of resources from both schools. Therefore, the committee supports this proposal.

SUPPORTING INFORMATION

The Governing Body of Grange Park Infant and Nursery School, and the Governing Body of Grange Park Junior School, along with the Council have been discussing this proposal since Summer 2024, and see a range of benefits in combining the existing schools into a new primary school, which include:

- A consistent approach to the ways in which children are taught and supported, recognising the current strengths of both schools.
- Increased opportunities for children in all key stages to come together for pastoral, social and creative activities.
- Consistency of parental involvement throughout the primary phase of education by having the ability to foster longer-term relationships with families within one school.
- Communication between school and parents will be simplified, especially for parents with children in both schools. It would remove any duplication and ensure a joined-up approach for events, training and other matters.
- Removes the need for parents to apply for a place at the Junior School as children would automatically continue their education as part of one Grange Park school.

- Increased career development opportunities for staff through the sharing of a wider range of expertise and the possibility to gain experience and an understanding of all Primary Key Stages.
- Greater opportunity for cost effectiveness through economies of scale e.g. in purchasing, ensuring the best provision possible for the children;

Both Grange Park Infant and Nursery School and Grange Park Junior School are maintained Foundation schools and share a building, with the Infant school operating downstairs and the Junior school operating upstairs. They both remained 'Good' at their last Ofsted Inspection. Grange Park Infant and Nursery School was inspected in June 2024, and Grange Park Junior School was inspected in November 2024.

The birth rate in Hillingdon has been steadily declining since 2016, which has impacted primary schools' pupil numbers across the Borough. The combined on-roll figures at Grange Park Infant and Nursery, and Grange Park Junior Schools have decreased by 12% over the past 5 Autumn census' as noted in the tables below and are expected to continue to reduce in line with falling birth rates.

Grange Park Infant School

Census	PAN	On Roll	% of PAN filled
Autumn 2020	360	318	88%
Autumn 2021	360	286	79%
Autumn 2022	360	263	73%
Autumn 2023	360	254	71%
Autumn 2024	330	245	74%

Grange Park Junior School

Census	PAN	On Roll	% of PAN filled
Autumn 2020	480	380	79%
Autumn 2021	480	400	83%
Autumn 2022	480	414	86%
Autumn 2023	480	380	79%
Autumn 2024	450	369	82%

To manage the falling roll in both schools, a formal consultation was undertaken by each school in Autumn 2022 to reduce the Published Admissions Number (PAN) from September 2024, reducing from 4FE to 3FE, a reduction of 30 pupils in each year group.

Equality Impact Assessment for both schools

An equality impact assessment was considered, however, as the children on roll at both schools will continue to attend the same site, with the same school, staff and the same support and funding, it was deemed to have no potential impact on any children who share protected characteristics.

There will be:

- No change to the Net Capacity of the School
- No change to the Published Admissions Number (PAN) of the schools
- No change to the curriculum being taught.

Therefore, it was not deemed necessary to carry out a full equality impact assessment. However, these changes will be monitored.

Financial Implications

As detailed in the Schools operational guide: 2025 to 2026 - GOV.UK, 'where schools amalgamate after 1 April 2025, the new school will receive funding equivalent to the formula funding of the closing schools added together for the appropriate proportion of the year. This means that they receive the combined lump sums for the remainder of the year and 70% of the second lump sum in the following year.

Local authorities can apply to provide a second year of protection. This needs to be discussed and agreed with Schools Forum."

The financial implication of the amalgamation of the two schools will be the eventual loss of the lump sum income usually available per school. The school will, however, benefit from better economies of scale which will mitigate the impact of this loss. A review of resource allocation and deployment as part of the amalgamation will also enable the school to mitigate the impact of the loss of one lump sum and gain a net positive from the amalgamation.

RESIDENT BENEFIT & CONSULTATION

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

As both schools are maintained foundation schools, Hillingdon Council can propose to close Grange Park Infant and Nursery School under Section 15 of the Education and Inspections Act 2006, with notice given in accordance with The School Organisation (Establishment and Discontinuance of Schools) Regulations 2013. The Governing Body of Grange Park Junior School are proposing to extend the age range of Junior School from 7–11-year-olds to 3–11-year-olds, with notice given in accordance with The School Organisation (Prescribed Alterations to Maintained Schools) (England) Regulations 2013.

The proposal to close a school is a term used by the DfE in its statutory guidance and is referred to in this proposal accordingly. When referencing an amalgamation of two schools, if the proposal is to close one school, the remaining school would retain its original school number, as it is not a new school, even if its phase has changed. There will be no changes to the land or buildings used and the school will continue to operate with the same pupil numbers but will formally be an all through primary school, under one registration number and will be inspected as one school, rather than two separate schools.

The two proposals follow two separate guidance processes: [Opening and closing maintained schools](#) and [Making significant changes \('prescribed alterations'\) to maintained schools](#).

While there is no longer a statutory ‘pre-publication’ consultation period for proposed prescribed alteration changes to increase the age range of a school, there is a statutory requirement to consult any parties the proposer thinks appropriate before publishing proposals under section 15 proposals to close a maintained school. Consultation was carried out in Autumn 2024 with the two Grange Park schools related to this proposal, however, the following engagement with all 10 sets of Infant and Junior Schools in Hillingdon by Council Officers should also be noted:

- 11th June 2024 – a letter was sent to all Infant and Junior Headteachers in keeping with the Council’s Infant and Junior Schools Amalgamation policy (Successful, Sustainable, Viable Schools). As part of this policy, on the retirement or resignation of the Headteacher from either of the linked Infant and Junior Schools, the two schools will amalgamate and form an all through primary school.

Information sessions for Headteachers and Governors of Infant or Junior schools were held

- Monday 1st July 2024 at 5:00 – 6:00 pm – 27 attendees (5 Officers and 22 Headteachers/ Governors)
- Tuesday 2nd July 2024 at 12:00 – 1:00 pm – 24 attendees (5 Officers and 18 Headteachers /Governors and 1 HR lead)

These sessions provided opportunity for Headteachers and Governors of Infant or Junior schools to find out more about the process and benefits of amalgamating and answer any queries or concerns from the schools. The meeting encouraged Infant and Junior schools, as well as Governing Bodies, to work closer together for the benefit of their shared school and local community.

The key enquiries from schools were related to research on the benefits of the potential amalgamation, and the financial impact on schools that do amalgamate.

Consultation carried out

The pre-publication consultation period was held with interested parties from 25th November 2024 to 16th January 2025.

An information session for stakeholders was held at the school site on 25th November 2024 which included the Headteacher, Senior Leadership Team (SLT) from both schools, Chair of Governors, and Governors from both Schools. The themes of which have been highlighted below:

Options for Amalgamation:

- A number of options were discussed, which are outlined earlier in the paper
- The process involves formal consultation and engagement with both Governing Boards.

Governance and Decision-Making:

- Discussions on the mechanism for the proposed amalgamation, including if one school closed and the age range of the other was extended.
- Emphasis on the importance of mutual agreement and transparency in communication between all parties and across both schools.

- The requirement for a minimum number of Governors across both schools, and the decision-making process for any changes as a result of the proposed amalgamation.

Queries, concerns and Feedback:

- Queries and concerns from staff and parents about the impact of the proposed amalgamation on jobs, finances, and school culture.
- Discussions on the timeline for the proposed amalgamation and the potential impact on staff and pupils.
- The importance of building trust and relationships between the two schools whether there is amalgamation or not.

Support and Next Steps:

- The Council and Schools HR (organisation commissioned by the schools to support with HR related matters) will support the two schools through the process if amalgamation is approved.
- The need for clear communication and agreement on the timeline and the process for the proposed amalgamation.
- The importance of making decisions that are in the best interest of the children.

Financial and Structural Considerations:

- The financial model for the proposed amalgamation.
- Discussions on the need for any internal restructuring.
- The importance of reviewing staff structures as part of the proposed amalgamation.

Support from Schools HR:

- Confirmation that Schools HR would assist with any related HR processes if the proposal to amalgamate is approved.
- Union engagement should be managed through Schools HR if the proposal to amalgamate is approved.

Staff Engagement and Communication:

- Emphasis on the need for staff to have space to engage with the process.
- Joint messaging to staff will become the standard approach during the process.
- Both schools agreed on a joint statement to staff.

Publication

As part of the formal consultation, the Council issued a Public Notice (**Appendix 2**) which was sent to the West London Gazette for publication on Wednesday 29th January 2025, with 4 copies put up around the school site on entrance/exits in line with the statutory process.

As the proposal for one change is linked to another, this was made clear in any notices that were published. Where a proposal by a local authority is 'related' to a proposal by other proposers

such as this, the 2 notices could be published together and cross-refer to the other.

The full proposal was published on the school's websites and the Council website, and included information setting out (in line with the statutory process):

- how copies of the proposal may be obtained;
- that anybody can object to, or comment on, the proposal;
- the date that the representation period ends; and
- the local authority's address to which objections or comments should be submitted.

Representation

The statutory proposal (**Appendix 3**), was available from Wednesday 29th January 2025 at 9:00am to Friday 7th March 2025 at 5:00pm on the consultation page of the Hillingdon Council website. This included a brief outline of the proposed change, the full proposal, Frequently Asked Questions (FAQ) document (**Appendix 4**), a copy of the Public Notice, and a questionnaire to obtain feedback.

Information regarding the consultation was publicised to all schools within the Borough via email. Both Grange Park Infant and Nursery School and Grange Park Junior School shared the information on their school webpages by including the pdfs of the above documents as well as including a link to the Hillingdon Council consultation webpage.

As Hillingdon Council also receives school admissions applications from residents who live outside of the Borough, the consultation was designed to be inclusive. Therefore, officers contacted the following surrounding Councils to share details of the consultation:

- London Borough of Ealing
- London Borough of Hounslow
- London Borough of Brent
- London Borough of Harrow
- Hertfordshire County Council
- Buckinghamshire County Council
- Slough Borough Council

There were also drop-in sessions at the school site, where Officers were on hand to answer any questions in person and to explain the proposal as necessary. This was held on Wednesday 12th February 2025 between 2:00pm – 3:00pm for stakeholders, including parents/guardians, school staff and residents (**12 attendees**) and a further session was held for school staff separately, from 3:30pm to 4:30pm (**46 attendees**), with a total of 58 attendees across the two sessions.

A virtual session was also held on Thursday 13th February 2025 at 5:00pm-6:00pm to provide another opportunity for stakeholders to ask questions or comment on the proposal (**1 attendee**).

Consultation Responses

84 responses were received in total during the consultation period with 83 submitted via the online questionnaire and 1 email. The responses are summarised below.

Online Questionnaire responses are summarised below:

1. **73** respondents agreed with the proposal to amalgamate Grange Park Infant and Nursery School and Grange Park Junior School to form a single three-form primary school
 - Yes - 73
 - No - 9
 - Don't know – 1
2. Of the **10** respondents that answered 'No' or 'Don't know', reasons have been summarised below in the paper
3. **75** respondents did not agree that the proposed changes would disadvantage any Hillingdon residents.
 - Yes - 4
 - No - 75
 - Don't know – 4
4. Of the **4** respondents that agreed that the changes will disadvantage Hillingdon residents, reasons have been summarised below in the paper.
5. **83** respondents have confirmed their interest in the proposal as:
 - A parent/ Carer/guardian – 27
 - A staff member – 32
 - A local resident – 5
 - Other – 14
 - Prefer not to say – 4
 - Blank – 1
6. **42** respondents stated that they have children under the age of 18 living in their household.
7. Respondents were invited to state which school(s) their child(ren) currently attend, and the responses were as follows:
 - Grange Park Infant and Nursery School – 18
 - Grange Park Junior School – 16
 - Grange Park (non-specified) – 11
 - Out of Borough – 3
 - Rosedale College – 2
 - Uxbridge College – 2
 - Belmore Academy – 1
 - Cranford Community College - 1
 - De Salis Studio College – 1
 - Douay Martyrs – 1

- Hedgewood - 1
- Langley Academy – 1
- Oak Wood School – 1
- Queensmead School – 1
- St Bernard’s Catholic Grammar School – 1
- Uxbridge High School – 1

8. **26** provided additional comments on the proposals which are summarised below:

One email response was received querying the proposed new Primary Schools uniform policy.

Please see themes of consultation responses below:

The information below seeks to set out the themes from the consultation to the proposal to Council’s proposal to close Grange Park Infant and Nursery School, and the Governing Body of Grange Park Junior School to extend the age range of Junior School from 7–11-year-olds to 3–11-year-olds.

THEMES

1. Safety of Younger Children

- Some respondents were worried about the safety of younger children (reception and nursery) when mixed with older students.

During the information event, it was made clear by the junior school Headteacher that children would continue to be educated and socialise with children of their own age as in other primary schools if the amalgamation is approved.

2. Disruption to Pupils' Education

- Some respondents were concerned that amalgamation might disrupt children’s learning and emotional well-being.

Children remain at the heart of this proposal, and their education and wellbeing remain a priority. Both schools are working closely together to ensure that children’s education or wellbeing is not impacted by the proposed amalgamation and will continue to work together whether the amalgamation is approved or not. Benefits of amalgamation for children are set out earlier in this paper.

3. Loss of Individual School Identities

- Some respondents were concerned that merging Grange Park schools will dilute their unique cultures and leadership styles

It is expected that both schools will benefit from the proposed amalgamation and implement the best practice from across both schools. Benefits of amalgamation for children are set out earlier in this paper. If the amalgamation process is approved, the school leadership team will also decide on plans for uniform across the Infants and Juniors.

4. Impact on Special Educational Needs (SEN) Provision

- Some respondents highlighted they were concerned that resources for SEN students might be restructured or reduced

It is expected that pupils will have access to a wider range of resources and support across the 2 schools if amalgamation is approved. This will provide a benefit to these pupils, along with the continuity for parents of liaising with one school and only having to tell their story once. Children remain at the heart of this proposal, and their education and wellbeing remain a priority. Support will continue to be provided for children that require it whether amalgamation is approved or not. Benefits of amalgamation for children are set out earlier in this paper.

5. Staffing Uncertainty

- Some respondents were worried that amalgamation may lead to staff redundancies, restructuring and increasing workloads.

During the consultation event, the Headteacher of the Junior school was very clear about the value of the staff in both schools and expressed a desire to work with the staff team if amalgamation was approved to retain as many staff as possible. It is also recognised that all schools expect to have an element of natural staff turnover regardless of the amalgamation process.

The school leadership team will keep this under review if the amalgamation is approved.

6. Request for more information to support the rationale for amalgamation

- Some respondents felt that more information about the rationale behind the amalgamation was needed.

The Council has set out a policy on amalgamation and the benefits to children and their education and wellbeing, along with the benefits to the schools. Benefits of amalgamation are set out earlier in this paper.

Academic research was also shared with both Governing Bodies during the initial discussions about the amalgamation process demonstrating the positive impact of amalgamation. A list of the academic research referenced can be found in **Appendix 5**.

7. Impact on Local Community

- Some respondents felt the proposed amalgamation would negatively affect the local community, and choice for parents

The proposed amalgamation would see the school continue to engage in the community and provide a smoother education journey for children as they would not need to apply for a place at the junior school as they do now. Parents will retain their ability to express a preference for which school their child attends, and this will not change as part of the proposed amalgamation. Benefits of amalgamation are set out earlier in this paper.

Consultation conclusions

As noted from the consultation responses, there is overwhelming support for the amalgamation, and a range of benefits for the children and the school outlined in the paper. It is felt that the proposed amalgamation will provide a better learning experience for children, with a more consistent journey through their primary education, sharing resources from both schools, and engaging with one set of staff who will know the children, and allow them to move seamlessly between year groups during their time at the school.

Next steps

If approval is granted by Cabinet, the Education Service will notify the Department for Education and implement the proposal following the requirements set within the [School organisation: local-authority-maintained schools - GOV.UK](#) guidance [Opening and closing maintained schools](#) and [Making significant changes \('prescribed alterations'\) to maintained schools](#).

The school will be expected to open as a Primary school in September 2025 if amalgamation is approved.

CORPORATE CONSIDERATIONS

Corporate Finance

Corporate Finance have reviewed this report and concur with the Financial Implications set out above, noting the recommendation to amalgamate Grange Park Infant & Nursing and Grange Park Junior Schools.

The resulting amalgamation will impact on the school's lump sum funding, however, the amalgamation is expected to generate economies of scale and overall lead to a net positive impact for the school.

Legal

There are no legal impediments to the recommendations within the report.

BACKGROUND PAPERS

[Consultation background papers:](#)

- Q&A Session at Grange Park Schools – Parents, Carers and Guardians – 12th February
- Q&A Session at Grange Park Schools – Staff member session – 12th February
- Q&A Session Virtual – Grange Park Amalgamation Proposal – 13th February
- School Place Planning Consultation – Proposal to Amalgamate Grange Park Schools (1-83)

[Select Committee minutes – 20th March](#)

[Opening and Closing maintained schools](#)

[Making significant changes \('prescribed alterations'\) to maintained schools.](#)

London Borough of Hillingdon

Successful, Sustainable, Viable Schools:

Infant & Junior Amalgamation Policy



London Borough of Hillingdon Amalgamation Policy

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Introduction

1. Hillingdon Council is a Local Authority (LA) with a role as commissioner and champion of parents and children. The LA has a statutory duty to ensure that there are sufficient and high-quality school places and wishes to support every school to be successful, sustainable, and viable. Hillingdon LA has delegated the majority of budgets and responsibilities to schools and the vast majority of Hillingdon schools provide a high-quality education to their pupils and strive constantly to raise the standard of education. They are committed to working collaboratively with each other and in partnership with all their stakeholders, with a strong focus on developing extended service provision for their local communities. Schools face constant challenges, and all are unique. LA works with them to shape a positive future for all pupils and schools.
2. Many pupils and schools have experienced high movement of pupils since Covid, and across London, primary school rolls have declined in the past few years and many now have some smaller year groups with fewer classes in. This affects how schools manage stability of classes, staffing and budgets and some have to move pupils between classes and teachers within a school year. The movements impact on pupils and constrains work to help them catch up after three years of interrupted schooling.
3. Schools need to be more resilient as rolls are volatile whilst families are still moving homes and jobs, and future roll projections are uncertain. London borough place-planning leads have discussed options to help stabilise schools and manage surplus places and declining primary rolls and a summary table of options is at Appendix 1. Hillingdon is now considering and progressing most of these options to best support schools in their different circumstances. The Education White and Green Papers, March 2022, adds further context and pressure, to improve support and integration of pupils with SEN in mainstream schools and for all schools to consider conversion to academy status, at the same time as budget pressures on schools will continue.
4. Approximately half of Hillingdon's total 99 schools are maintained by the LA; 1 community nursery school; 29 community primary and 2 special (1 primary and 1 secondary); 10 VA primary, 6 Foundation primary and 2 Foundation Secondary. These include most of the primary schools with the lowest rolls in Hillingdon, and current funding pressures require the LA to review how best to support these schools and prevent further schools becoming unviable educationally or financially. The other half of schools are academies, mostly in small local multi academy trusts (MATs) or standalone, 49 schools in a total of 22 Trusts.
5. Most Hillingdon primary schools are three form entry or larger, and 92% are graded good or outstanding by Ofsted and very popular with parents. There are only 8 one form entry schools, mainly Church of England or Roman Catholic schools. However, there are also ten pairs of Infant and Junior schools and following roll decline 18 (January 2022 Census) of these 20 schools have rolls below 420 pupils, a two form entry primary school, though they are two, three or four form entry. In September 2021 two more pairs of Infant and Junior schools became primary schools after consulting and deciding to amalgamate. The Infant and Junior schools are particularly vulnerable to financial and class organisation pressures as they only have three or four year groups to move teachers around. All are maintained except for two Junior schools that joined different MATs. In recent years several have had difficulties in recruiting leaders or staff, or have been graded 'Requires Improvement' by Ofsted and/or have fallen into deficit, as class sizes have fallen below the viable level (around 25). All of this affects pupil experiences and if

one school is struggling, some families move pupils out of both schools.

6. Hillingdon LA has now updated its policy on amalgamation of Infant and Junior schools as it considers all-through primary phase schools are more resilient to support all their pupils to learn and achieve across a wide curriculum, with continuity from age 3-11. This should have benefits across the borough:
 - a. all schools more likely to maintain and improve the quality of education
 - b. parents in all areas of the borough continue to be offered a choice of local provision
 - c. public resources are used more efficiently and effectively.
7. This policy draws on the experience of those schools who have recently amalgamated and other LA's good practice, rooted in supporting educational improvement. Amalgamation will be considered when it is in the best interests of current and future pupils attending the schools involved, considering local and individual circumstances. In the implementation of this amalgamation policy, the local authority will work from 2022 onwards with governing bodies and other parties to achieve combined 'all-through' primary schools where and when appropriate. Also, the LA is willing to help broker discussions between one-form entry schools and dioceses about shared Executive Headships and other joint arrangements between groups of two or three small schools, who wish to retain their individual status but share costs and expertise.
8. Each Infant and Junior school governing body is asked to discuss this policy and plan their own route towards full amalgamation. For some this may be some years ahead, though others may be pushed by circumstances setting off triggers. Many already have joint committees of the two chairs and heads or have federated to form one governing body in advance of full amalgamation, with one Executive Head or share posts such as SENCO and site manager.
9. This Policy will only be applied to Hillingdon maintained schools for which the LA retains the responsibility for conducting school organisational changes of this nature. Any school that has converted to academy status falls under the remit of the Regional Schools Commissioner (RSC) on behalf of the Department for Education (DfE) and would not be subject to this policy. However, DfE national policy supports amalgamation.

The Educational Case for Amalgamation

10. The creation of all through primary schools brings a number of benefits including:
 - a. The staffing structure is aligned with the National Curriculum Key Stages; there may be separate leaders for Foundation, Key Stages 1 and 2 but there will be coherent planning across the primary phase and shared expertise, giving greater flexibility across and between the Key Stages, to meet the needs of all pupils.
 - b. Separate Infant and Junior schools are disproportionately more likely to be graded Requires Improvement by Ofsted or to have budget deficits.
 - c. More resources spent on pupils in classes and employing specialist staff. A primary school provides strong continuity and progression for children and families in terms of the curriculum and social experience. This is particularly beneficial to pupils with special and additional needs or high abilities.
 - d. All pupils have access to staff expertise and resources such as musical instruments and groups, and sport, gym facilities and playing fields (most Infant schools do not have fields), and to a wider range of wrap-around and extra-curricular activities.
 - e. Better recruitment, succession planning and retention of staff and opportunities for

staff to learn and develop professionally within schools. All teachers and classroom staff have access to the whole primary curriculum. This supports and informs whole school planning, assessment, pastoral systems, etc, and provides opportunities for wider staff development and experience across the full primary phase.

- f. Infant and Junior schools are not eligible to apply for leadership schemes such as Teaching School Hubs due to their small size and infrastructure. The DfE rarely recognises Infant schools within funded schemes, such as Covid digital devices. Primary schools receive more support than Infant and Junior schools, which strengthens the argument for the benefit of shared access to resources.
- g. This would create more three form primary schools and some four form entry - all with more scope to be flexible if some year groups are smaller. This will help schools make the best use of their funding and expertise.

Governance and Leadership

11. A single governing body and headteacher can provide strategic governance and vision for all primary key stages and be accountable for outcomes across the school phases, and allocation of resources between them. Currently there are difficulties recruiting governors so a refocus of resources would improve more schools.

Parents Views

12. Whilst Infant and Junior schools are popular with parents it was clear by 2021 that separate Infant and Junior schools tend to have more vacancies than all-through primary schools and where there is a local choice the nearby primary school tends to be full and over-subscribed and parents choose to move pupils into them if there are vacancies. This has led to pupils 'waiting' for a while until a vacancy occurs, and this is disruptive for those pupils and others in their classes.
13. Parents with several children can be irritated by the separate structures, offices and rules applying to their children across the two schools and the differences in policies such as reading, SEN support, behaviour, spelling, homework etc. However, where separate schools work closely together, the duplication of structures adds costs.

Financial Implications

14. Most of the separate Infant and Junior schools are below 420 pupils, that is two form entry and they lack financial resilience, scope for economies of scale or a wide range of staff expertise.
15. Local authorities are legally constrained in how much they can help schools in difficulty. School Budgets are currently under huge pressure from inflation, high fixed costs and a fall in primary rolls across London due to the impact of the lower birth rate, Brexit and Covid. Separate Infant and Junior schools are more likely than all-through primary schools to have financial pressures, and often the leadership structure and non-teaching costs are disproportionately expensive. The amalgamation of Infant and Junior schools should result in savings being achieved over the first few years, through a rationalisation of resources and economies of scale by combining operations and streamlining the procurement of services.
16. Combined schools sharing the same site are able to maximise the efficiency of their resources, with scope for more expertise to be shared across the school. A combined school staffing structure removes duplication and support functions can be consolidated across the single school, with a positive impact on the budget.
17. Primary pupil numbers are volatile and a combined single school on a site has more resilience to be flexible with allocating staff if year groups different in size, and improve the accommodation and use of the site.

18. The amalgamation of the schools will allow for a pooling of asset related revenue budgets, and the ability to manage property costs over both buildings, which will support a better maintenance regime.

The Policy

19. The London Borough of Hillingdon will require Governing Bodies of all separate Infant and Junior schools to consider amalgamating their two linked schools when one or more of the following 'trigger circumstances' occur, unless there are compelling and overriding reasons:
- a) A headteacher vacancy arises in either or both schools.
 - b) Total pupil numbers in either school are 25% or more below the Published Admission Number.
 - c) Ofsted inspection in one of the schools identifies a 'Requires Improvement' judgement.
 - d) One or both of the schools cannot set a balanced budget or has financial problems.
 - e) One or both of the schools involved is judged to be a 'School causing concern' by the London Borough of Hillingdon.
 - f) One or both schools have PANs or are recruiting at below two forms of entry – making the individual schools relatively small and at risk of becoming unviable within the Hillingdon funding context.
 - g) Other pressures whereby the educational provision would be improved through amalgamation such as provision of SEN support, staff recruitment and retention or issues linked to the buildings.

Implementation

20. Discussions, advice, reports, and consultations about school organisation matters will be led by the Head of School Place Planning on behalf of the Director of Education.
21. Progress towards amalgamation will be presumed unless the educational advantages set out in this policy would not be delivered by combining the two schools. Both school Governing Bodies will need to work with the Local Authority to address any concerns and plan the timescale for amalgamation. The London Borough of Hillingdon will consider using the powers available to it to require amalgamation if there is a pressing case for this and Governing Bodies are not addressing the matters.
22. Newly amalgamated schools retain both lump sums in the year of amalgamation and then get some protection for at least one year (two if Schools Forum and DfE agree) and can choose to plan a longer phasing in of different changes; such as to policies, use of the building or staff structures; in order to maximise benefits and avoid negative disruption to pupils.
23. When considering whether to convert to academy status all governing bodies of separate Infant and Junior schools are urged to consider amalgamation at the same time. The Local Authority will not support separate Infant and Junior conversions as it fails to deliver all the education, social and other benefits to pupils, parents and schools set out above. There are now two lone Infant schools and if they wish to join the Trust of their linked Junior school, this would be supported by the LA.

Legislative Framework

24. Amalgamation involves making changes to the organisation of schools and this is governed by statutory processes that are detailed in the Department for Education

guidance booklet [Opening and Closing Maintained Schools](#). Section 3 of the document specifies that the process for amalgamating a linked Infant and Junior school requires that one or both schools undergoes a ‘technical’ closure. This requires a formal consultation on proposals led by the LA, working closely with the governing bodies to involve parents, staff, and other stakeholders.

25. In accordance with the Education and Inspections Act 2006 (“the 2006 Act”) the local authority has power to bring forward proposals to make changes to schools. Within these powers there are two routes for the local authority to achieve a combined school:
 - To extend the age range and expand the capacity of one school and to discontinue the other school.
 - To discontinue both schools and seek proposals for the establishment of an academy school.

26. When it is proposed to amalgamate schools under the terms of this amalgamation policy, the default position of the London Borough of Hillingdon will be to extend the age range and expand the capacity of one school and to discontinue the other school. This approach is adopted to ensure timely processes can be planned and to minimise any risk to the continuity of schooling.

27. When the trigger circumstance to amalgamate schools is the resignation of a headteacher, the local authority will usually discontinue the school where the headteacher has resigned and the vacancy occurs. The local authority considers that this provides a consistent and objective approach that does not imply any issue of underperformance or of take-over. The local authority will consider each case on an individual basis and consider any specific circumstances.

28. Whichever route is followed to establish the combined school, the governing body of the newly combined school must be representative of the former schools, with experience across Foundation Stage to Key Stage 2. If one school is closed and they do not already have a federated governing body in place, the governing body of the other school whose age range is extended will reconstitute itself for the combined school to ensure that this representation is achieved.

The Statutory Process

29. This section below, from the DfE guidance, sets out the stages of the statutory process. The statutory process below must be followed as set out by DfE in *Opening and Closing Maintained Schools*. The LA school Place Planning team will lead this for community schools and closely support Foundation schools.

Stage 1: Consultation

30. It is a statutory requirement to consult any parties the proposer thinks are appropriate before publishing proposals under section 10 or 11 for new schools and for section 15 proposals to close a maintained school.
31. The proposer may use the consultation to consider a range of options for the future of a school (e.g. amalgamation, federation, or closure). However, the proposer must then publish specific proposals (see stage two of the statutory process below). It is these specific proposals setting out details of the new school or the school to be closed which can be commented on or objected to during the statutory representation period.
32. It is for the proposer to determine the nature and length of the consultation. It is best practice for consultations to be carried out in term time to allow the maximum number of people to respond. Proposers should have regard to the Cabinet Office guidance on Consultation principles when deciding how to carry out the consultation period.

Stage 2: Publication

33. The proposer must publish the full proposal on a website along with a statement setting out:
 - how copies of the proposal may be obtained;
 - that anybody can object to, or comment on, the proposal;
 - the date that the representation period ends; and
 - the address to which objections or comments should be submitted.
34. A brief notice containing the website address of the full proposal must be published in a local newspaper and may also be published in a conspicuous place on the school premises (where any exist), such as at all of the entrances to the school.

Stage 3: Representation

35. Proposers of a school closure should consult organisations, groups, and individuals they feel to be appropriate during the representation period (the information at Annex A can be used for examples).
36. The representation period starts on the date of publication of the statutory proposal and MUST last for four weeks. During this period, any person or organisation can submit comments on the proposal to the LA, to be considered by the decision-maker. It is also good practice for LAs to forward representations to the proposer (subject to any issues of data protection or confidentiality) to ensure that they are aware of local opinion.
37. The decision-maker will need to be satisfied that the proposer has had regard for the statutory process and must consider ALL the views submitted during the representation period, including all support for, objections to, and comments on the proposal.

Stage 4: Decision

38. The LA will be the decision-maker on a school closure proposal, unless the closure proposal is 'related' to another proposal that is to be decided by the Schools Adjudicator.
39. The Schools Adjudicator will decide proposals for new schools made by the LA (and cases where the LA is involved in the trust of a proposed foundation school). The LA will decide proposals for new schools from other proposers.

Actions and rough Timeline of key decisions – by both LA and schools

	Description
	Conclude informal discussions between Heads, governors and LA officers and other relevant stakeholders such as HR providers.
1	Full Governing Body decision to amalgamate.
2	Liaison with the Borough of Hillingdon over proposed amalgamation including agreeing Borough support/roles and responsibilities and process to seek Department for Education approval.
3	Informal consultation on proposed amalgamation with staff and unions (separate process for parents/carers and pupils). Acting Head Teachers, Governing Body representative, Borough Education Adviser and HR Consultant present.
4	If necessary, agree recruitment strategy for new Head Teacher & place advert.
5	London Borough of Hillingdon Cabinet Member approval to propose amalgamation LA will need to draft a Public Notice which will be sent to the West London Gazette (for publication on a Wednesday) and put up on the school site physically as part of the next step.
6	Formal 4-week consultation on proposed amalgamation with key stakeholders including staff, unions, parents/carers and pupils. Consultation meetings held with staff/unions and parents/carers. Acting Head Teachers, Governing Body representative, Borough Education Adviser and HR Consultant present as appropriate.
7	If needed, selection process for new Head Teacher including short-listing, invitations to selection day(s), interview and selection processes.
8	Ratification of Head Teacher appointment by Full Governing Body.
9	Final decision on proposal to amalgamate subject to the issue of Statutory Notice by Borough of Hillingdon. <i>Once all the views and feedback of all stakeholders has been considered then this must be sent to the lead member to agree for LA approval as per DfE guidance.</i> <i>If the decision is to proceed, the following steps apply. If the decision to remain as separate schools, then the process halts.</i> Where the LA is the decision-maker, within one week of making a determination they MUST publish their decision and the reasons for that decision being made on their website. They MUST arrange for notification of the decision and reasons for it to be sent to relevant parties.
10	Appointed Head Teacher* for the new primary school will review staffing structures for both schools in conjunction with Governing Body, Borough Education Adviser and HR consultant.
11	Head Teacher* in conjunction with Governing Body, Borough Education Adviser and HR consultant create the proposed staffing structure for the new primary school.

12	Head Teacher* in conjunction with Governing Body, Borough Education Adviser and HR consultant create or amend any new job descriptions for posts in the primary school.
13	Head Teacher* in conjunction with Governing Body, Borough Education Adviser and HR consultant produce a new primary school document covering staffing implications i.e. current and proposed staff structures and how the new structure will be implemented.
14	If there is a risk of redundancy, school** to declare a redundancy situation with advice and support of HR consultant meeting statutory and procedural requirements.
15	Head Teacher** in conjunction with the Governing Body and HR consultant to prepare invite letters to formal consultation meeting for staff and unions.
16	Head Teacher** to send the following documents to staff and unions, along with the invite letter to the formal consultation meeting: <ol style="list-style-type: none"> 1. new primary school consultation document explaining rationale for staffing changes 2. current staff structures for both schools 3. proposed new primary staff structure 4. implementation timeline 5. new job descriptions (where applicable)
17	Formal consultation meeting with staff and unions. Head Teacher*, Governing Body representative, Borough Education Adviser and HR Consultant present.
18	End of formal consultation period (consultation period up to 4 weeks).
19	The Governing Body considers responses raised during the consultation period.
20	Governing Body formally responds to staff and unions to end of consultation and in response to any comments receive
21	Follow staff restructuring process as set out in consultation documents/school policies.
22	Amalgamation and associated primary school staff structure takes effect.

ADDRESSING SURPLUS PRIMARY SCHOOL PLACES- OPTIONS TO CONSIDER

London Councils Place Planning Workshop – December 2021. Cate Duffy- Interim Director of Children’s Services, Islington

Option	Opportunities	Risks
1. Financial advice to schools to reduce costs- e.g. staffing restructures	<ul style="list-style-type: none"> <input type="checkbox"/> May support school sustainability if action is taken in a timely fashion. <input type="checkbox"/> Likely to be something all schools need to consider in a context of surplus places 	<ul style="list-style-type: none"> <input type="checkbox"/> LA may not have the expertise to provide advice- schools may not wish to accept <input type="checkbox"/> Unlikely this will be enough by itself to sustain some schools if there is a large surplus in the area or where school already has significant falling rolls <input type="checkbox"/> Staff reductions may impact more negatively on vulnerable children <input type="checkbox"/> Any redundancies bring extra costs
2.Partnerships – Federation or MAT	<ul style="list-style-type: none"> <input type="checkbox"/> May support wider school improvement objectives of school collaboration and system leadership <input type="checkbox"/> may reduce costs through shared appts <input type="checkbox"/> May improve popularity of a school if partner with more well regarded school 	<ul style="list-style-type: none"> <input type="checkbox"/> Tends to increase not reduce costs – e.g. larger SLT <input type="checkbox"/> Unlikely to be enough to sustain schools if there is a large surplus in the area or where an individual school already has significant falling rolls
3. Additional provision to increase revenue – Early Years or SEND Resourced Provision (ARP)	<ul style="list-style-type: none"> <input type="checkbox"/> May provide additional revenue <input type="checkbox"/> May improve popularity 	<ul style="list-style-type: none"> <input type="checkbox"/> Early years numbers likely to be low if birth rate falling <input type="checkbox"/> Costs of SEND provision may be higher than income <input type="checkbox"/> Schools with falling rolls may not have the right culture and expertise to support SEND provision and may not be popular with parents of children with SEND- therefore decisions on ARP must be driven by the needs of SEND children
4. Co-location with other services e.g. libraries	<ul style="list-style-type: none"> <input type="checkbox"/> May provide additional revenue and support running costs <input type="checkbox"/> May provide additional curriculum opportunities for children e.g. library <input type="checkbox"/> May enhance position of school as heart of community 	<ul style="list-style-type: none"> <input type="checkbox"/> Unlikely this will be enough by itself to sustain some schools if there is a large surplus in the area or where school already has significant falling rolls <input type="checkbox"/> May be practical challenges in separating space and ensuring safeguarding
5. Co-location with another school	<ul style="list-style-type: none"> <input type="checkbox"/> May reduce running costs for both schools- efficient use of one site/facilities <input type="checkbox"/> May allow school in poor quality buildings to move to better quality <input type="checkbox"/> May free up a school site in location which supports wider council objectives/services <input type="checkbox"/> Minimal redundancies <input type="checkbox"/> may encourage collaborative working 	<ul style="list-style-type: none"> <input type="checkbox"/> Disruptive for all staff and students but particularly the school that is moving <input type="checkbox"/> May be unpopular with parents at one or both schools <input type="checkbox"/> Requires culture shift by both schools to share space which may be challenging <input type="checkbox"/> Risk that empty site may be taken for Free school (likely to be much reduced if area has surplus places and good outcomes)

6. PAN Reduction	<input type="checkbox"/> Largely uncontroversial <input type="checkbox"/> Achieves reduction of places to reduce impact of falling rolls <input type="checkbox"/> Capacity can quickly be brought back if demand increases	<input type="checkbox"/> Requires 2 year lead in for perm reduction <input type="checkbox"/> Creates more smaller schools- reduces parent choice and may be more financially insecure <input type="checkbox"/> Stops the tap but takes 7 years for full effect
7. Merger with PAN reduction- 1 school closes by default	<input type="checkbox"/> Achieves immediate PAN reduction across all year groups <input type="checkbox"/> Timescale about 1 year but can be implemented up to 3 years later allowing more children to work through original school <input type="checkbox"/> All children from one school move together – less disruptive for them and more acceptable to parents <input type="checkbox"/> Children likely move from an unviable school which may not be able to provide best quality education to newly merged school which is likely to be financially sustainable	<input type="checkbox"/> Likely to be unpopular with the community of at least one school and therefor politically challenging <input type="checkbox"/> Risk that empty site may be taken for Free school (likely to be much reduced if area has surplus places and good outcomes) <input type="checkbox"/> Redundancies likely
8. School closure	<input type="checkbox"/> Achieves immediate PAN reduction across all year groups <input type="checkbox"/> Timescale about 1 year but can be implemented up to 3 years later allowing more children to work through original school <input type="checkbox"/> Most children moving from closed school likely to move to other LA schools with spaces and therefore improve their viability	<input type="checkbox"/> Very disruptive for children attending closed school – lose likely to separate from friends, progress likely to be negatively impacted particularly for the most vulnerable <input type="checkbox"/> Influx to neighbouring schools may be hard to manage and have negative impact on quality of education <input type="checkbox"/> Likely to be unpopular with the community of at least one school and therefor politically challenging <input type="checkbox"/> Risk that empty site may be taken for Free school (likely to be much reduced if area has surplus places and good outcomes) <input type="checkbox"/> Redundancies likely

NOTES

- These options are not mutually exclusive. Areas with a large surplus may need to consider all of them.
- All options will require discussion with the RSC and Diocesan Board in the case of academies and faith schools. In the case of academies the RSC is the decision maker and therefore the LA must lead by influence
- Objections to PAN Reductions/School Closure can be raised with the Schools Adjudicator who has the power to overrule
- Under Section 77 of the School Standards and Framework Act 1998, local authorities are required to apply for the consent of the Secretary of State for Education to dispose of, or change the use of, land used for maintained schools and academies. The Secretary of State must first consider the potential for the land to be used by an existing or potential Academy(Free School).



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Statutory Notice

**Amalgamation of Grange Park Infant and Nursery School,
Lansbury Drive, Hayes, UB4 8SF URN: 102433 and
Grange Park Junior School, Lansbury Drive, Hayes, UB4 8SF, URN: 102432**

**Part 1: Closure of Grange Park Infant and Nursery School
(Maintained)**

Notice is given in accordance with The School Organisation (Establishment and Discontinuance of Schools) Regulations 2013 that the London Borough of Hillingdon is proposing to discontinue Grange Park Infant and Nursery School with effect from 31st August 2025.

**Part 2: Prescribed Alteration to Grange Park Junior School
(Maintained)**

Notice is given in accordance with The School Organisation (Prescribed Alterations to Maintained Schools) (England) Regulations 2013 that the Governing Body of Grange Park Junior School is proposing to make prescribed alterations to Grange Park Junior School with effect from 1st September 2025. The prescribed alterations proposed are:

- Extend the age range of Grange Park Junior School to accommodate pupils from Nursery to Year 6.
- Increase the total pupil numbers at Grange Park Junior School to 630 pupils.

This Notice is an extract from the complete proposal, copies of which may be obtained from School Place Planning Team, Hillingdon Council, Civic Centre, 3N/01, High Street Uxbridge, UB8 1UW

Email: schoolplaceplanning@hillington.gov.uk.

Website: www.hillingdon.gov.uk/have-your-say

Within four weeks from the date of publication of this proposal, any person may object to, support, or make comments on the proposal via School Place Planning Team, Hillingdon Council, Civic Centre, 3N/01, High Street, Uxbridge, UB8 1UW

Email: schoolplaceplanning@hillington.gov.uk

Responses must be received by 7th March 2025 at 5pm.

Signed: ABI PRESTON

Date: 29th January 2025

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Statutory Proposal to amalgamate Grange Park Infant and Nursery School and Grange Park Junior School

Notice is given in accordance with The School Organisation (Establishment and Discontinuance of Schools) Regulations 2013 that the London Borough of Hillingdon is proposing to discontinue Grange Park Infant and Nursery School with effect from 31st August 2025. Notice is also given in accordance with The School Organisation (Prescribed Alterations to Maintained Schools) (England) Regulations 2013 that the Governing Body of Grange Park Junior School is proposing to make prescribed alterations to Grange Park Junior School with effect from 1st September 2025. The prescribed alterations proposed are:

- Extend the age range of Grange Park Junior School to accommodate pupils from Nursery to Year 6.
- Increase the total pupil numbers at Grange Park Junior School to 630 pupils.

Name and address of local authority:

London Borough of Hillingdon, Civic Centre, High Street, Uxbridge, UB8 1UW

Name, address and category of schools proposed to be amalgamated:

Grange Park Infant and Nursery School, Lansbury Drive, Hayes, UB4 8SF, URN: 102433 (Foundation School)

Grange Park Junior School, Lansbury Drive, Hayes, UB4 8SF, URN: 102432 (Foundation School)

This proposal is published following the Department for Education Statutory Guidance (October 2024) Making Significant Changes ('prescribed alterations') to Maintained Schools and Opening and Closing Maintained schools (October 2024).

Type of Proposal

Closure of Grange Park Infant and Nursery School and the expansion of the age range of Grange Park Junior school to create a primary school.

Proposal

The Governing Board of Grange Park Junior School and the London Borough of Hillingdon, with the support of the Governing Board of Grange Park Nursery and Infant

School, are consulting on a proposal for the two schools to amalgamate to form a single three-form entry foundation primary school for children aged 3 to 11 years with effect from 1st September 2025, with a total published pupil number of 630.

Proposer

The proposers for the closure of Grange Park Infant and Nursery School are Hillingdon Council. The Governing Body of Grange Park Infant and Nursery School are supportive of the principle of amalgamation set out in the Hillingdon Council policy.

The proposers for the expansion of the age range of Grange Park Junior School are the Governing Body of Grange Park Junior School, with the support of Hillingdon Council.

Implementation Date

It is proposed that Grange Park Infant and Nursery School would close on 31st August 2025 and Grange Park Junior School will expand to become a Primary on the existing site with effect from 1st September 2025.

Reason for amalgamation

Part of the role of any Governing Board is to consider the long-term vision of the school(s) it is responsible for and how, in the future, they can continue to:

- improve and provide the best possible education and care for every child;
- provide an excellent working environment and experience for staff; and
- support and work with their local community

Both schools are on the same site and share a building, and both schools are rated 'Good' at their last Ofsted Inspection. Grange Park Infant and Nursery Schools taking place in June 2024 and Grange Park Junior Schools in November 2024.

With the headteacher of Grange Park Infant and Nursery School retiring in Summer 2024, Hillingdon Council required the governing bodies of both schools to consider amalgamation in line with the Hillingdon Council policy.

The birth rate in Hillingdon has been steadily declining since 2016, which has impacted Primary Schools pupil numbers across the Borough. The combined on-roll figures at Grange Park Infant and Nursery and Grange Park Junior Schools have decreased over the past 5 Autumn Census'. To manage the falling roll in both schools, a formal consultation was undertaken in Autumn 2022 to reduce the Published Admissions Number (PAN) from September 2024, reducing from 4FE to 3FE.

The Governing Body of Grange Park Infant and Nursery School and the Governing Body of Grange Park Junior School along with the Council see advantages in combining the existing schools into a new primary school including. These advantages are listed in the Frequently Asked Questions (FAQ) document and include:

- A consistent approach to the ways in which children are taught and supported, recognising the current strengths of both schools.
- Increased opportunities for children in all key stages to come together for pastoral, social and creative activities.
- Consistency of parental involvement throughout the primary phase of education by having the ability to foster longer-term relationships with families within one school;
- Communication between school and parents will be simplified, especially for parents with children in both schools. It would remove any duplication and ensure a joined up approach for events, training and other matters;
- Removes the need for parents to apply for a place at the Junior School as children would automatically continue their education as part of one Grange Park school.
- Increased career development opportunities for staff through the sharing of a wider range of expertise and the possibility to gain experience and an understanding of all Primary Key Stages.
- Greater opportunity for cost effectiveness through economies of scale e.g. in purchasing, ensuring the best provision possible for the children;

Pupil Numbers and Admissions

Grange Park Infant and Nursery School is a 3FE maintained foundation infant school with 320 pupils on roll (including Nursery), for pupils aged 3 to 7 as per the October 2024 Census.

Grange Park Infant & Nursery School	Nursery	Reception	Year 1	Year 2	Total
On Roll October 2024	75	79	89	77	320

Grange Park Junior School is a 3FE maintained foundation junior school with 369 pupils on roll, for pupils aged 7 to 11 as per the October 2024 Census.

Grange Park Junior School	Year 3	Year 4	Year 5	Year 6	Total
On Roll October 2024	83	88	96	102	369

There is no boarding provision at either school.

Sex of pupils

Both schools are co-educational. Not applicable

Displaced pupils

This proposal forms an amalgamation, and therefore no pupils would be displaced. From 1st September 2025, pupils currently at Grange Park Infant and Nursery School would have places at the expanded Grange Park Junior School. Current pupils in Year 2 would automatically transition to Year 3.

Impact on the community

Grange Park Infant and Nursery School and Grange Park Junior School serve the same geographic area and occupy the same building. The proposed amalgamation of Grange Park Infant and Nursery School and Grange Park Junior School will not displace any pupils, or have any impact on travel, and will therefore have no impact on the community. The proposal will provide certainty of progression to the junior phase and offer an all-through primary education.

Rural primary schools

Not applicable.

Balance of denominational provision

Not applicable.

Early Years provision

It is intended that the current nursery at Grange Park Infant and Nursery School would continue to operate as part of the primary school, and the proposed age-range change of Grange Park Junior School includes the nursery provision. There would be no change for children in the current setting, therefore, the provision would continue to be accessible and convenient for local families.

Sixth Form provision

Not applicable.

Effect on other Educational Establishments

There may be minimal impact on other educational establishments as current pupils from Grange Park Infant and Nursery School will automatically be transferred to Grange Park Junior School. For the last 3 years, all children attending the infant school secured places at the Junior school, so it is likely that there will not be any impact on surrounding schools.

Special Educational Needs

The schools do not provide a specialist resource provision (SRP) or a Designated Unit (DU) recognised by the local authority as being reserved for children with special educational needs. Children with special educational needs will continue to receive the same high levels of support in the primary school.

Travel

Both Grange Park Infant and Nursery School and Grange Park Junior School are located on the same site so there will be no travel implications.

Financial implications

As detailed in the [Schools operational guide: 2025 to 2026 - GOV.UK](#), 'where schools amalgamate after 1 April 2025, the new school will receive funding equivalent to the formula funding of the closing schools added together for the appropriate proportion of the year. This means that they receive the combined lump sums for the remainder of the year and 70% of the second lump sum in the following year.

Local authorities may apply to provide a second year of protection. This needs to be discussed and agreed with schools forum'.

Process for making representations (objections and comments)

Within four weeks from the date of publication of this proposal, from Wednesday 29th January 2025 to Friday 7th March 2025, any person may object to or make comments on the proposal. During this time any person can send written representation to the Council directly to have their views on the proposals taken into consideration by the decision maker.

You can respond to the by:

- Completing the online questionnaire by visiting the consultation page www.hillingdon.gov.uk/consultation
- Emailing schoolplaceplanning@hillingdon.gov.uk.
- Submit a written response to: School Place Planning Team, London Brough of Hillingdon, Civic Centre, 3N/01, High Street, Uxbridge, UB8 1UW

All consultation responses must be received by 5pm on Friday 7th March 2025.

The consultation will involve a drop-in session for anyone affected by the proposal where Officers will be on hand to answer questions in person and to explain the proposal as necessary. This opportunity will be also offered virtually for stakeholders to attend if that is more convenient.

Drop-in Session		
Location	Date/Time	Session
Grange Park Infant and Nursery/Junior School Lansbury Drive Hayes UB4 8SF	Wednesday 12 th February 2025 2:00pm – 3:00pm (parents/carers/residents) 3:30pm – 4:30pm (staff members)	Drop in – Question and Answer
On-Line session		
Location	Date/Time	Session
Microsoft Teams Join the virtual meeting	Thursday 13 th February 5:00pm – 6:00pm	On-line - Question and Answer

Decision

Hillingdon Local Authority will be the decision maker. They must satisfy themselves that an appropriate fair and open local consultation has been carried out. The Local Authority will decide within two months of the closure of the consultation period. When the decision has been taken, the Local Authority will publish the outcome of the decision on their website and communicate the outcome to relevant stakeholders in writing.

A copy of this consultation is also available at:

- [Grange Park Infant and Nursery website](#)
- [Grange Park Junior School website](#)

Alternatively, you can make contact with the Council or the schools through the email or postal addresses below to request a hard copy of the consultation documents.

- Email:
 - School Place Planning, Hillingdon Council - schoolplaceplanning@Hillingdon.gov.uk

- Grange Park Infant School Governing Body - clerktogovs@gpin.school
- Grange Park Junior School Governing Body – enquiries@grangeparkjuniorschool.co.uk
- Writing to: School Place Planning Team, London Brough of Hillingdon, Civic Centre, 3N/01, High Street, Uxbridge, UB8 1UW
- Hard copies of this proposal can also be obtained by contacting:
 - Grange Park Infant School, Lansbury Drive, Hayes, UB4 8SF
 - Grange Park Junior School, Lansbury Drive, Hayes, UB4 8SF

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Frequently Asked Questions

What are some of the advantages of the proposed amalgamation?

The proposal to amalgamate the schools is underpinned by the intention of the Governing Body of the Junior School and the Council, with the support of the Governing Board of Grange Park Nursery and Infant School in line with the Hillingdon Council policy, to further improve the quality of provision already in place at both schools by ensuring a consistent and continuous approach to teaching and learning throughout children's time at Grange Park. It will also enable the Governing Body, Headteacher and staff to plan pastoral support for pupils from Nursery to Year 6. Finally, the proposal will enable the two schools to merge and strengthen their community links and to build on the extended school programmes in place in both schools.

Educational advantages for pupils

- The proposed amalgamation would eliminate the Infant to Junior School move at the end of Year 2 removing any anxiety this might cause, as well as interruptions to learning.
- Enhanced curriculum planning which can take into account all three stages of the primary phase of education (Early Years, Key Stage 1 and Key Stage 2) so that children make the best possible progress in their learning and development during their time at Grange Park;
- A consistent approach to the ways in which children are taught and supported, recognising the current strengths of both schools.
- Being able to monitor children's progress from age 3 to age 11 would enable staff to build up a comprehensive understanding of each child and build consistently on their achievements throughout their time at Grange Park.
- Continuity of experience and provision, which could be especially important for vulnerable children and those with special educational needs.
- Increased opportunities for children in all key stages to come together for pastoral, social and creative activities.
- Improved safeguarding through seamless knowledge of children throughout their time at Grange Park.
- Would allow consistency of policy and planning across key stages as well as the potential for cross-phase policies with a key stage specific focus.

Advantages for school families

- Consistency of parental involvement throughout the primary phase of education by having the ability to foster longer-term relationships with families within one school;

- Communication between school and parents will be simplified, especially for parents with children in both schools. It would remove any duplication and ensure a joined up approach for events, training and other matters;
- Removes the need for parents to apply for a place at the Junior School as children would automatically continue their education as part of one Grange Park school.

Advantages for the leadership and governance

- A single leadership team providing vision and continuity from Nursery to Year 6;
- The opportunity to build partnerships with children, parents and families over a longer period of time.
- Working in partnership as one school within the community.
- A single larger staff team would provide a wider range of expertise and greater resilience.
- The potential to attract from a wider pool of teaching and support staff due to greater career opportunities provided by an all through primary school.

Advantages for the staff

- Increased career development opportunities through the sharing of a wider range of expertise and the possibility to gain experience and an understanding of all Key Stages.
- Continuous assessment, tracking and target-setting procedures for the entire primary phase of education;
- Opportunities to use the accommodation of both schools more effectively to support teaching and learning;
- Stability of staffing and increased opportunities for staff retention through improved staffing structures.

Advantages for the use of resources

- Increased sharing of resources and expertise would benefit both children and staff and avoid unnecessary duplication.
- As one school there is the potential to improve the use of school facilities e.g. specialist teaching spaces, reception areas, outdoor areas;
- Greater opportunity for cost effectiveness through economies of scale e.g. in purchasing, ensuring the best provision possible for the children;
- A larger workforce with a broader range of shared expertise.

What are the risks in amalgamating the two schools?

Hillingdon Council and the Governing Body of Grange Park Junior School consider that the proposed amalgamation would bring a range of benefits and opportunities to the schools' pupils, staff and families as outlined above.

One possible risk is that the amalgamation process may distract governors and staff during the year with some uncertainty until legal decisions are taken, and then with implementation work required after legal decisions. This work includes the alignment of processes, procedures, ethos and culture. To mitigate this risk, the schools are working closely together, and with Hillingdon Council to minimise the impact upon pupils, and governor and staff time to ensure that the process runs as smoothly as possible.

Also, pursuing this route (i.e. an amalgamation) would be more complex and time consuming in the short term than simply recruiting a new headteacher for the Infant School. An amalgamation may also be unsettling to staff and would need to be carefully managed. The Governing Body is committed to undertaking all steps of this process in an open and transparent way, with the best interests of the schools at heart.

The timetable outlined in the proposal allows sufficient time to deliver the amalgamation, although sometimes a longer period is considered. As outlined above, if the proposed amalgamation progresses, the implementation of the amalgamation will be dealt with through collaboration of the staff and leadership teams across both schools. The 2 school leadership teams are working closely together at this time, to plan for any potential changes, and support closer working relationships.

There are a number of other possible risks that are common to all schools – such as staff recruitment and retention, pupil numbers in the local area changing, and school funding decisions by the Department for Education. Amalgamation is not considered to increase the risk of any of these issues and indeed may help reduce or manage the risk compared to remaining as separate infant and junior schools.

Whatever the outcome, the Governing Body of Grange Park Infant and Nursery School and the Governing Body of Grange Park Junior School, staff and the Council, continue to be committed to the high level of provision and support for all children and families for which the Grange Park schools are well known for.

How would the new school be created?

It is important to emphasize that the Governing Body of Grange Park Nursery and Infant School, Governing Body of Grange Park Junior School and Hillingdon Council are

approaching this to allow the proposed amalgamation to take the best features of both schools into the new school. The proposed process involves the following steps:

- Closing Grange Park Infant and Nursery School and transferring pupils, staff, land, buildings and equipment to Grange Park Junior School on 31 August 2025
- Extending the age range of Grange Park Junior School from Years 3 to 6 to Nursery to Year 6 (and changing its name to reflect the full primary age range) with effect from 1 September 2025

Will there be any changes to the size of the school and the school buildings?

No, the size of the school and building will remain exactly the same. The proposed Primary school will have a *published admission number* equal to the sum of the current Infant, Nursery and Junior Schools' numbers. Therefore, there would be **no change to the capacity** of the proposed amalgamated Primary school if the decision were made to proceed.

Does the amalgamation affect school funding?

The education budget that the Council receives from government is 'ring-fenced' and can only be spent on education – so there is no saving to the Council through amalgamation. The budget for each individual school is determined by a formula that includes some amounts for every school but is mainly determined by the number of pupils. There are many primary schools in the borough the same size as the proposed new primary school, and they are able to provide effective education within their budgets.

As detailed in the [Schools operational guide: 2025 to 2026 - GOV.UK](#), 'where schools amalgamate after 1 April 2025, the new school will receive funding equivalent to the formula funding of the closing schools added together for the appropriate proportion of the year. This means that they receive the combined lump sums for the remainder of the year and 70% of the second lump sum in the following year.

Local authorities may apply to provide a second year of protection. This needs to be discussed and agreed with schools forum'.

What will happen if the amalgamation does not proceed?

The schools would remain separate and the governing body of the Grange Park Infant School would appoint a new permanent headteacher.

Will the school rename itself to Grange Park Primary School if the schools amalgamate?

If the schools do progress to amalgamation then the governing body together with Mrs Madar (Headteacher at Grange Park Junior school) would consult with staff, parents and carers on a possible new name for the all-through primary school.

Who would be the governors of the proposed new Primary School?

The Governing Body of Grange Park Junior School will consult with the Governing Body of Grange Park Infant and Nursery School and review its Instrument of Government to ensure it accurately records the term of office for each category of governor as well as the name of the school and membership of governors needed to support the school with a balanced and effective governance structure. It is envisaged that the new Governing Body will comprise of a combination of Governors of both current schools.

Will there be a new uniform?

The decision on accepted uniform and when it will be introduced will be confirmed by the Governing Body of Grange Park Junior School if amalgamation is progressed.

What would the school admissions arrangements be if there is an amalgamation?

The admissions process would be simplified, as there would be no need for families to submit an application for a Junior School place. Children attending the school in Year 2 would automatically move to Year 3.

There would be no changes to the admissions arrangements for Nursery and Reception.

Who will be parents' first point of contact if the schools amalgamate? Will there just be one reception team?

It is too early at this stage to know exactly how the school support team would be structured. If the schools do amalgamate, arrangements for contacting the school would be simplified, as there would likely be a single office email address and telephone number.

If an amalgamation goes ahead, would everything just be 'done the junior way'?

The Governing Body recognises that the schools each have their own unique values and want to ensure that those of Grange Park Infant and Nursery School are not lost if the schools do amalgamate. If the amalgamation is approved, the Governing Body of the Junior School would be keen to seek the opinion of staff and families regarding what works well and what makes the schools special.

Who would be the head teacher of the Primary School if amalgamation goes ahead?

Mrs Rena Madar (current Headteacher of Grange Park Junior school)

Will there be any job losses if amalgamation progresses?

The staffing structure would be considered in detail by the schools if the amalgamation is formally approved. This would involve further consultation with staff and trade unions, as appropriate by the school.

Will staff have the opportunity to work across different key stages (EYFS, Key Stage 1 and Key Stage 2) if amalgamation progresses?

This will be a decision for the school, but in principle yes, becoming a Primary School would give staff the opportunity to gain experience in different key stages where they were interested in doing so. This would be based on individual preferences and the school's requirements, and the school would decide how this would work in practice.

Will there be any changes to the Senior Leadership Team structure if amalgamation progresses?

It is too early in the process to confirm what the Senior Leadership Team structure might look like. Staff would of course be consulted by the school on any changes. Any consultations would include a timeframe for any changes. This would be the responsibility of the school.

Will there be any changes to subject leaders – i.e. would there be a need for two subject coordinators?

It is too early in the process to confirm what a primary staffing structure might look like for the new school. Staff would of course be consulted by the school on any changes to the staffing structures. Any consultations would include a timeframe for any changes. This would be the responsibility of the school.

Will teachers be moved into different year groups or key stages?

This will be a decision for the school, with some people seeing this as an opportunity to gain experience of a different Key Stage. The best interests of the children will also obviously be in mind when decisions are made too. This would be the responsibility of the school.

Will the teachers and support staff stay the same?

The Governing Body of each school is the underlying employer in both the Infant and Nursery School and the Junior School. As such, if the proposed amalgamation goes ahead, the place of work for employees will change to the Primary School. If the decision is made to amalgamate the two schools, then a staffing structure for the Primary and

Nursery School would be drawn-up as part of the planning process and both staff and recognised trade unions would be consulted on this.

Will there be any changes to the size of the school and the school buildings?

No, the size of the school and building will remain exactly the same. The proposed Primary School will have a *published admission number* equal to the sum of the current Infant, Nursery and Junior schools' numbers. Therefore, there would be **no change to the capacity** of the proposed amalgamated Primary School if the decision were made to proceed.

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Academic Research of the benefits of Amalgamation

1. "The Impact of School Amalgamation: A Study of the Effects of Amalgamating Infant and Junior Schools"

- Author(s): McGhee, D., & McNaughton, S.

- Date: 2000

- Summary: This study examines the effects of amalgamation on educational outcomes, demonstrating improvements in school cohesion and student performance.

2. "Moving Towards Primary School: The Benefits of Amalgamation"

- Author(s): Siraj-Blatchford, I., & Manni, L.

- Date: 2007

- Summary: This research highlights the benefits of transitioning to a primary school model, focusing on continuity in education and improved social and emotional development for children.

3. "Primary School Amalgamation: The Impact on Educational Attainment and Social Development"

- Author(s): Hargreaves, A., & Fullan, M.

- Date: 2012

- Summary: This paper discusses the relationship between school amalgamation and higher educational attainment, along with enhanced social skills among students.

4. "A Review of Literature on School Amalgamation: Challenges and Opportunities"

- Author(s): McKinsey & Company

- Date: 2010

- Summary: This literature review synthesizes various studies on school amalgamation, concluding that merging schools can lead to better resource utilization and improved educational environments.

5. "The Effects of Amalgamation on School Performance: A Longitudinal Study"

- Author(s): Wiggins, R. & Cummings, C.

- Date: 2015

- Summary: This longitudinal study investigates the long-term effects of amalgamation, finding positive trends in student achievement and school satisfaction ratings post-merger.

6. "Amalgamation of Schools: A Policy Review"

- Author(s): Department for Education (DfE)

- Date: 2014

- Summary: This governmental report reviews various amalgamation policies across the UK, showing evidence of improved educational outcomes and resource

efficiency in schools that have merged.

7. "Continuity and Change: The Impact of Primary School Amalgamation"

- Author(s): Smith, D., & Brown, T.

- Date: 2016

- Summary: This research explores how amalgamation fosters continuity in children's education, leading to better integration and smoother transitions between year groups.

8. "A Study of the Educational Benefits of Amalgamating Infant and Junior Schools"

- Author(s): Ball, S. J., & Youdell, D.

- Date: 2012

- Summary: This study emphasizes the educational benefits of creating a unified primary school system, including enhanced curriculum continuity and improved student support services.

9. "The Impact of School Amalgamation on Community: A Case Study Approach"

- Author(s): Cummings, C., & Dyson, A.

- Date: 2011

- Summary: This case study highlights the positive community impacts of school amalgamation, including increased parental involvement and stronger community ties.

10. "School Amalgamation and Student Outcomes: Evidence from the UK"

- Author(s): McMahon, D. & O'Neill, R.

- Date: 2018

- Summary: This research assesses student outcomes before and after amalgamation, finding significant improvements in academic performance and social integration.

STRATEGIC CLIMATE ACTION PLAN - 2025 -2028

Cabinet Member & Portfolio	Cllr Eddie Lavery Cabinet Member for the Community and Environment
Responsible Officer	Karrie Whelan Corporate Director - Place
Report Author & Directorate	Ian Thynne Environmental Planning Specialists, Planning and Sustainable Growth
Papers with report	Strategic Climate Action Plan – Adopted Version Appendix 1 – Hillingdon Friends of the Earth Consultation Response

HEADLINES

Summary	<p>The Council declared a climate emergency in 2020 and followed this with the adoption of the comprehensive Strategic Climate Action Plan. ‘The Plan’ contains 6 corporate commitments aligned with 9 Key Themes to cover a wide range of action to address the climate emergency. A review of the plan in 2024 formed part of the commitment.</p> <p>‘The Review’ sets out the action to be taken over the next 3 years (identified as the short to medium term). It retains the vision, corporate commitments and key themes but sets out an amended series of actions to continue to positively tackle the climate emergency in a more focused and targeted manner.</p> <p>The review also sets out the progress since the adoption of the plan noting the challenging environment facing all local authorities. It identifies significant progress against the majority of the key themes and also where further development is required. It also reports on the council’s own positive progress towards its carbon neutral target.</p> <p>The review was published for consultation which ran from 11 November 2024 through to 12 January 2025. The responses have informed this version presented for adoption.</p>
<p>Putting our Residents First</p> <p>Delivering on the Council Strategy 2022-2026</p>	<p>This report supports our ambition for residents / the Council of: Live in a sustainable borough that is carbon neutral</p> <p>This report supports our commitments to residents of: A Green and Sustainable Borough</p> <p>The Strategic Climate Action Plan sits as a parent strategy and is supported by:</p>

	<ul style="list-style-type: none"> • Transport Strategies including Local Implementation Plan • The Local Plan • Electric Vehicle Charging Strategy • Air Quality Action Plan • Flood Risk Management Plan • Tree Strategy • Green Space Management Plans • Procurement Strategies
<p>Financial Cost</p>	<p>The production of the review has been developed using existing internal resources as well as consultancy support to review carbon footprint data. The consultancy support has been funded by Section 106 (carbon) funds.</p> <p>The Review commits to actions that are in line with business-as-usual approaches to tackle climate action, with additional funding from external sources, i.e. Section 106 funds and public sector decarbonisation scheme (PSDS).</p> <p>Action to reduce the carbon footprint will ultimately result in more efficient council operations with projects prioritised that have the additional benefit of reducing exposure to energy costs or are income generators (i.e. solar panel installations, improved building efficiency, and energy saving measures).</p>
<p>Select Committee</p>	<p>Residents' Services Select Committee</p>
<p>Ward(s)</p>	<p>All</p>

RECOMMENDATIONS

That Cabinet:

- 1. Consider the outcome of the public consultation;**
- 2. Approve the updated Strategic Climate Action Plan 2025-2028**

Reasons for recommendation

The Council declared a climate emergency in 2020 and responded by producing the strategic climate action plan ('the Plan') which was adopted in 2021. The plan included a commitment to undertake a review in 2024.

This commitment was to ensure that continued action remains focused, prioritised and aligned with the vision and corporate commitments set out in the plan. It also provides the opportunity to reflect on how best to target current resources to maximise effective action.

The commitment also required the review to be subject to public consultation to allow residents, communities and other stakeholders to actively engage in the future actions to address the climate emergency.

The consultation was undertaken from November 2024 until 12 January 2025. The consultation was via an online survey with invitation to respond through alternative media. There were 33 responses to the survey and a separate comprehensive response from Hillingdon Friends of the Earth (attached). Changes have been made to the plan because of the consultation.

The review sets out the approach for 2025 through to 2028.

Alternative options considered / risk management

It is considered that a 'business as usual' approach, (i.e. retaining the current plan and not undertaking a review) would still result in effective climate action but it would not necessarily be a targeted or efficient use of resources available. This approach would also be inconsistent with the commitments made in the original plan.

Democratic compliance / previous authority

The Cabinet approved the strategic climate action plan review to be subject to a formal consultation from November 2024 to January 2025.

Select Committee comments

Hillingdon Council's Overview and Scrutiny Committees have regularly reviewed implementation of the Climate Action Plan, since inception. More recently, the Residents' Services Select Committee has been involved in this review and consultation of the updated Plan at their meeting on 27 November 2025 and the minutes of that meeting are set out in the background papers. The Committee is scheduled to undertake further scrutiny of the delivery of the Action Plan annually.

SUPPORTING INFORMATION

1. On 16th January 2020 at full Council, the London Borough of Hillingdon declared a climate emergency. The impetus for the declaration was a petition from residents and member recognition of the global and local issues associated with climate change. The declaration impacted council business across all departments as it looks for ways to adapt and mitigate for climate change.
2. The adoption of the strategic climate action plan followed in 2021 and set out how the council would respond to the climate emergency. This included a series of corporate commitments aligned with 9 key themes which would heavily influence council wide operations. The plan included a series of specific actions linked to the themes. These were comprehensive and ambitious.
3. The declaration and subsequent plan also heavily influenced the subsequent council strategy which states:

Hillingdon will be a sustainable, carbon-neutral borough, protecting Hillingdon's heritage, built environment and valued green spaces. Residents will live in pleasant neighbourhoods with access to sustainable waste management and transport.

4. The Plan included a commitment to undertake a review of the actions in 2024.

Need for Continued Action

5. As part of the review, it has been necessary to restate the need for continued action. Although the plan set out a great deal of progress across a range of council operations, it also stated why further action and progress was needed.
6. Since the plan was adopted, more information and understanding about the impacts of climate change have emerged. The climate continues to warm at significant rates with 2022 and 2023 the warmest years on record. In 2023, the UK recorded the wettest September to December period since 2000 with a sequence of named storms.
7. More information is also now available on the impacts of climate change and how this effects all communities but particularly the most vulnerable. Risks to water supply, localised flooding, loss of biodiversity, heat stress and uncertain food security are among some of the impacts associated with a changing climate. The environmental and social impacts are considered to result in significant economic disruption.
8. The review therefore presents the need for continued and sustained action.

Progress

9. The review also presents the opportunity to set out how much progress has been made in the last 3 years against the commitments made.
10. It records positive progress against the majority of the 9 key themes with further development required against two (i.e. where progress is less than positive). The review recognises that progress has been complicated by the challenging circumstances facing all local authorities but still reports very positive performance

Key Theme	Progress Recorded
Community Leadership	Development Required
The Council's Own Operations	Very Positive
Building Better Places	Very Positive
Using and Producing Clean and Green Energy	Positive
Waste Management	Very Positive
Climate Change Adaptation and Mitigation	Positive
Carbon Offsetting	Positive
Sustainable Transportation	Positive
Transparency, Communication and Reporting	Development Required

11. Progress has been particularly positive in relation to our commitment to become carbon neutral. It sets out a 54% reduction in our own emissions from the 2020 baseline reported in the original Plan. This is a significant achievement and reflects considerable work to improve the fleet and reduce emissions across council assets.
12. Importantly, the most recent Public Sector Decarbonisation Scheme (PSDS) work at the Civic Centre is forecast to make a significant contribution to carbon reduction. The civic centre is the asset with by far the largest carbon footprint and the PSDS project will reduce this by nearly 50% once complete and operational.
13. The review also considers wider actions committed to in the original plan and records significant progress and where further actions should be targeted.
14. Considerable progress is particularly noted in relation to the management of waste, flood risk, green spaces and new development. Areas requiring more development include engagement with schools and communities, biodiversity planning and in relation to the transparency, communication and reporting of progress.

Actions

15. The review has identified that the direction of travel set out in 2021 remains broadly the correct one with many of the objectives still relevant, appropriate and sufficiently challenging. Inevitably there are some amendments in order to prioritise resources where maximum benefit can be achieved.
16. The review therefore concludes with setting out the actions to be taken over the next 3 years to achieve the vision and corporate commitments. The table above shows where further targeted action would be required with particular attention on work with school and young people (community leadership theme) which was a key part of the original plan.
17. It is recommended that there is a reduced range of actions with those remaining to be more targeted and focused to make an efficient use of the resource available. The review therefore reports on what is going to be taken forward, but to focus on the priority actions over the next three years.

Annual Review

18. The plan will continue to be kept under review with an annual progress report submitted every autumn in addition to scrutiny by the Residents' Services Select Committee. This allows the actions to be revised and added to as and when appropriate.

Financial Implications

19. The approach adopted by the council is to embed carbon management within business as usual operations. This avoids a costly 'bolt on' solution to work already being undertaken. The targeted actions over the next three years are intended to reflect current workstreams and objectives in line with the Council Strategy; all in line with current budgets. Council Resources along with external funding, for example through the Public Sector Decarbonisation Scheme and Section 106 funds, will be accessed to deliver projects that are deemed to result in meaningful outputs.

20. Below is a breakdown of the Investment in Carbon Initiatives to date and funding yet to be allocated.

Investment in Carbon Initiatives to date

Programme	Project	Total Project Budget £000	S106 Funding £000	PSDS Funding £000	Council Resources Funding £000
Carbon Initiative Programme	Carbon Initiatives Programme - Park Lodge Solar Farm	565	0	0	565
Carbon Initiative Programme	Carbon Initiatives Programme - Public Sector Decarbonisation Scheme Civic Centre Winston Churchill Hall Highgrove Leisure Centre Hillingdon Sports and Leisure Centre	19,542	2,263	13,750	3,529
Carbon Initiative Programme	Carbon Initiatives Programme - London Environment Directors Network	80			80
Corporate Property of Works	Grainges, Cedars and Blyth Road Car Parks - installation of Cummulite Emergency Lighting Systems	762	281		481

Civic Centre Transformation	Mezzanine. Basement and Members Car Parks - installation of Cummulite Emergency Lighting Systems	566			566
Civic Centre Transformation	Installation of Commulite emergency lighting system at the Civic Centre Service tunnels below the building	86			86
Carbon Offset Officer	Carbon Offset Officer	59	59		
Total		21,660	2,603	13,750	5,307

Budget Allocated for Carbon Initiatives yet to be identified and developed

Programme	Project	Total Project Budget £000	S106 Funding £000	PSDS Funding £000	Council Resources Funding £000
Section 106 carbon reduction	Programmes to be developed	4,400	4,400		
Carbon Initiative Programme	Carbon Initiatives unallocated Programmes to be developed	4,813			4,813
Total		9,213	4,400	0	4,813

21. To date £21,660k has been invested in carbon Initiative schemes. Currently the council holds £4,400k unallocated Section 106 carbon reduction funds along with £4,813k of council resources that can be drawn down against and used towards schemes that will enable to deliver the strategic climate action plan.

RESIDENT BENEFIT & CONSULTATION

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

22. The climate action strategy is the basis for borough improvements in several areas. Residents and communities will benefit from a clear picture of how the council is responding to the climate emergency. All actions are intended to respond to the climate emergency which is recognised to have major impacts on residents. In addition, targeted carbon reduction action will result in long term savings through a reduction in energy demand or through income generation from renewable energy supplies.

23. Following the consultation (see below) the proposed adopted version has been strengthened to provide greater community facing action for 2025/26. The review recognises that further work is required in relation to community leadership key theme although accepting the challenges facing the local authority in delivering. However, following the consultation feedback and discussions with Hillingdon Friends of the Earth,

the proposed adopted version rationalises the previous scope of activity into a more focussed list of actions that will benefit residents.

Consultation & Engagement carried out (or required)

24. A full public consultation was carried out from 11 November 2024 until 12 January 2025 in accordance with the approved Consultation Strategy.

Hillingdon Friends of the Earth

25. Hillingdon Friends of the Earth (FOE) are a valued partner in developing climate action. They have been regularly engaged since 2024 on a range of issues, principally relating to the council strategy objective of a 'green and sustainable borough'.

26. Hillingdon FOE provided a detailed and comprehensive response which is attached in the supporting papers.

27. The response supports the progress made and recognises the good work undertaken to date. It also identifies the areas for improvement, particularly relating to the community leadership theme. A large part of the commentary relates to more specific details that will emerge through the development of the supporting action plans identified in the Plan and carried through to this review.

28. Specific to this review, the Hillingdon FOE response has resulted in the addition of text in relation to the impacts of climate change, minor amendments elsewhere and further actions at R1.6 and R1.7 relating to community leadership. A large focus of the response relates to details which officers consider are suitably addressed at a broad level in the review but will need to be considered as plans for implementation are developed further. Officers meet monthly with Hillingdon FOE who continue to provide valuable insight into climate action. Officers will continue to liaise with Hillingdon FOE as the detailed climate action work is developed further.

Survey Responses

29. There were 33 responses to the survey. Climate change continues to be a divisive topic with responders equally critical of the council not being progressive enough whilst others believing more should be done.

30. The relevant responses related to specific climate action details that sit at the operational state at the level below the strategy. Nonetheless, these provide an understanding of the priorities for residents and will be reflected in ongoing discussions as the detailed actions develop.

31. The relevant matters are set out in the table below:

Topic	Addressed in the Plan
Community	
More information for residents on energy efficiency measures	R1.1, R1.2, R1.3, R1.4, R1.5, R1.7, R9.2, R9.3
Clearer understanding of the Climate Action being done for communities	
More information on climate change	
More information requested in relation to solar panels and where to get funding assistance	
More education for young people	
Transport	
Greater north/south public transport links particularly to Hillingdon Hospital	R8.1, R8.2
More electric vehicle charging points	R8.6
Improve cycling infrastructure including facilities	R8.3, R8.4, R8.5
Biodiversity	
Provide better accommodation for biodiversity in the public realm	R7.2, R7.4, R7.5
More biodiversity improvements particular in urban areas	
Tree planting needs to be more coherent	
Less mowing and more natural spaces including tiny forests (link: what are tiny forests)	
Air Quality	
More action on idling vehicles	Air Quality Action
Waste Management	
More recycling at kerbside	R5.4, R5.5
Promote repair and less disposal	
Infrastructure	
Dimming of streetlights	R2.6
More solar panels	R2.4
More rain gardens	R6.3, Local Flood Risk Management Strategy
Improvements to Council housing	R2.3

CORPORATE CONSIDERATIONS

Corporate Finance

Corporate finance have reviewed this report and concur with the financial Implications set out above, noting the recommendation to adopt the strategic climate action plan review for 2025-2028 to continue addressing the climate emergency.

Furthermore, it is noted that the actions outlined in the review are in line with business-as-usual approaches to tackle climate action, with additional funding from external sources such as section 106 funds and the public sector decarbonisation scheme (PSDS). The targeted actions over the next three years are intended to reflect current workstreams and objectives in line with the council strategy, all within current budgets.

The council has invested £21.66m in carbon Initiative schemes to date, with £4.4m unallocated section 106 carbon reduction funds and £4.813m of council resources available for future schemes. This funding strategy ensures that the council can continue to deliver meaningful outputs and progress towards its carbon neutral target.

Legal

The climate change Act 2008 provides the legal framework to reduce greenhouse gas emissions and thereby enable the UK to adapt to climate change. The council plays a pivotal role in meeting the government's net zero strategy to achieve net zero greenhouse gas emissions through its strategic climate action plan ("the Plan") that was adopted in 2021.

In order to ensure that the plan remains relevant and in line with emerging climate change data, and legal and policy updates, the council should review the plan every three to five years. The council reviewed the plan in 2024, and following a public consultation on the plan, it was updated accordingly. The reviewed plan is therefore necessary for the council to continue delivering effective carbon initiative schemes in the council's area.

BACKGROUND PAPERS

[Select Committee minutes – 27 November 2024](#)



London Borough of Hillingdon Climate Action

**Action Plan
2025 to 2028**

Foreword

It has been three years since we published our Strategic Plan to take climate action and, in that time, Local Authorities have faced unprecedented challenges.

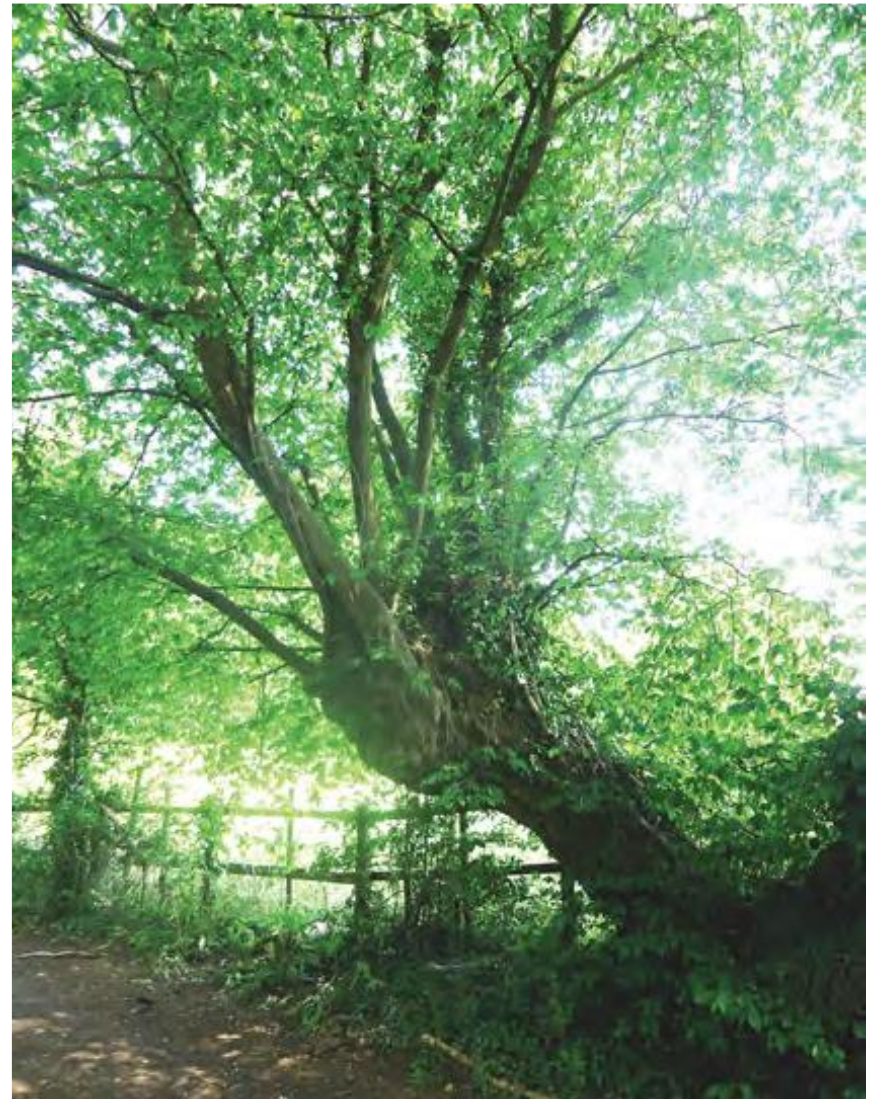
Despite that, I am pleased to present this updated plan on the back of a great deal of progress where we have prioritised resources to maximise the impact of our actions.

Further action remains essential. The impacts of climate change continue to become more apparent. Our aims and objectives have therefore not changed. We will be carbon neutral by 2030 and will continue to embed climate action across our services.

This updated plan reflects on our achievements to date and the need to allocate our resources and prioritise action with care. We will continue to adapt to the changing demands and ensure our short to medium term actions are kept under review to ensure they are achievable.

This means more targeted action planning with the focus on making a noticeable difference.

Councillor Eddie Lavery
Cabinet Member for Community and Environment



*Common hornbeam. Bayhurst Wood, Harefield
200-300 years of age*

Preface

In July 2021, the Council adopted its Strategic Climate Action Plan. This set out our response to the climate emergency that the Council declared on 16 January 2020.

The plan set out a range of activities that were guided by six corporate climate commitments aligned to nine themed action areas. It was ambitious and comprehensive and reflects the nature of the climate emergency.

We committed to keeping the plan under review to ensure focussed and prioritised action. The Vision and corporate commitments are intended to remain the same but the actions to meet them are being refreshed where necessary.

Our Plan outlines the actions we intend to take with the resources available to us, emphasizing the need for flexibility in these rapidly changing circumstances.

This is the first review period 3 years after the plan was adopted and results in the short (1 year) to medium (2-3

year) term actions to take us through to the second review period in 2028.

Like all local authorities nationwide, we are grappling with unprecedented financial challenges. Despite this, we have made some exceptional progress against many of our objectives and commitments.

Therefore, it is not considered necessary to markedly alter the approaches adopted in the 2021 Plan but the challenges invariably require us to take a more rationalised approach to climate action.

This Review focusses on how and where best to prioritise our attention for the short to medium term that maximise effective climate action.

To support this, we are committed to leveraging all available grant funding to mitigate and adapt to climate change, recognizing the long-term financial benefits this can bring to the council.

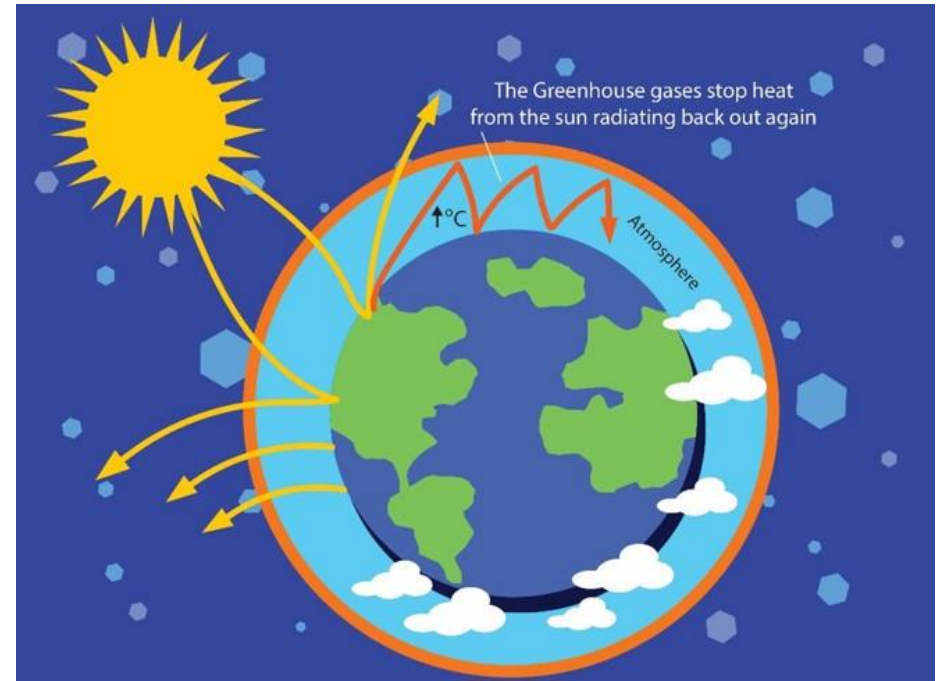
The revised strategy was subject to consultation from 11 November 2024 through to 12 January 2025.

1. The Need for Continued Action

What is Climate Change?

The world's climate is changing due to increased levels of gases such as carbon dioxide in the atmosphere. These 'greenhouse' gases occur naturally in the atmosphere, trapping heat that comes from the sun like the glass in a greenhouse. The 'greenhouse effect' is a natural occurrence and without it the Earth would be over 30 degrees cooler and uninhabitable.

However, due to human activities such as the burning of fossil fuels (oil, gas and coal) and deforestation, concentrations of greenhouse gases in the atmosphere are rising rapidly and making the natural greenhouse effect more pronounced, trapping more of the sun's heat and resulting in a rise in the earth's temperature.



Recent Trends

The changing climate has significant negative repercussions that are experienced by all our communities. In July 2024 the Royal Meteorological Society published its 2023 State of the UK Climate report. The following are the 'highlights':

Observations show that extremes of temperature in the UK have been affected much more than average temperature. The number of 'hot' days (28C) has more than doubled and 'very hot' days (30C) more than trebled for the most recent decade (2014-2023) compared to 1961-1990.

UK winters for the most recent decade (2014–2023) have been 9% wetter than 1991–2020 and 24% wetter than 1961–1990, with smaller increases in summer and autumn and none in spring.

Five of the ten wettest years for the UK in the series from 1836 have occurred in the 21st Century.

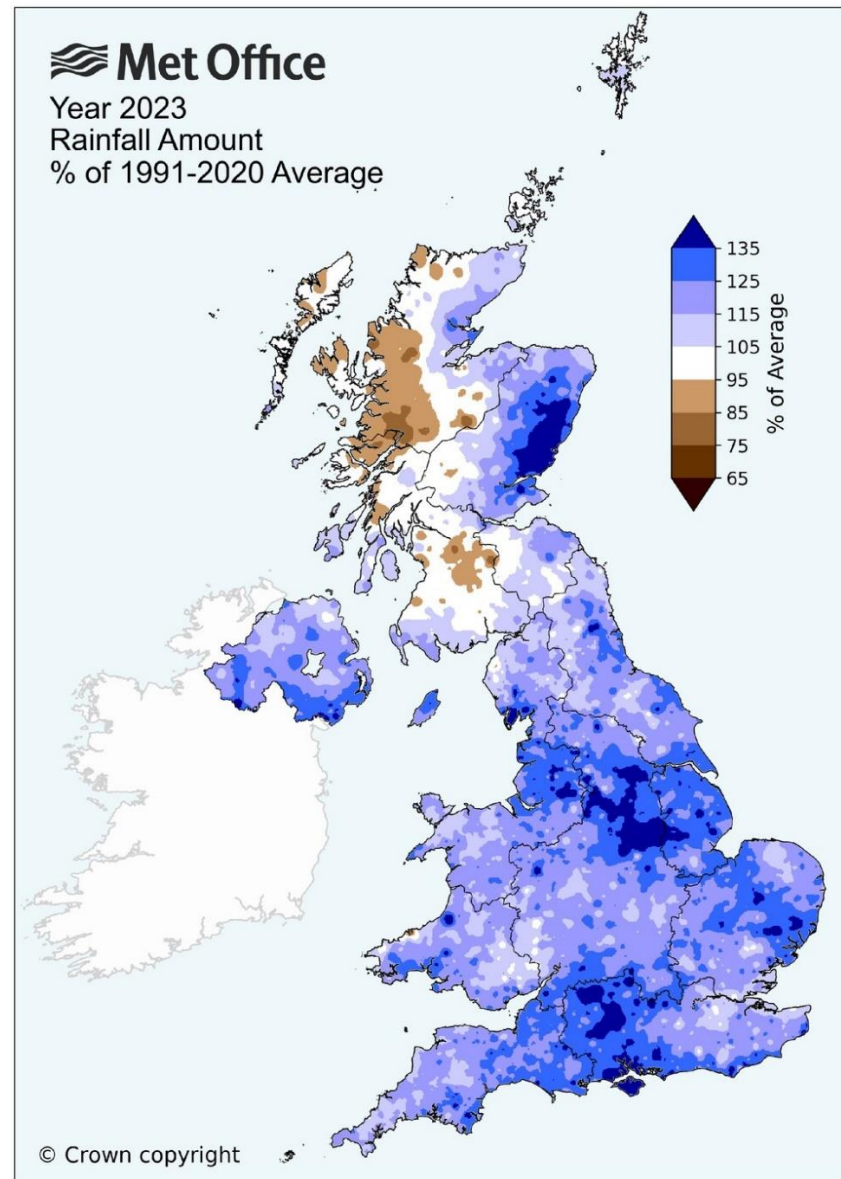
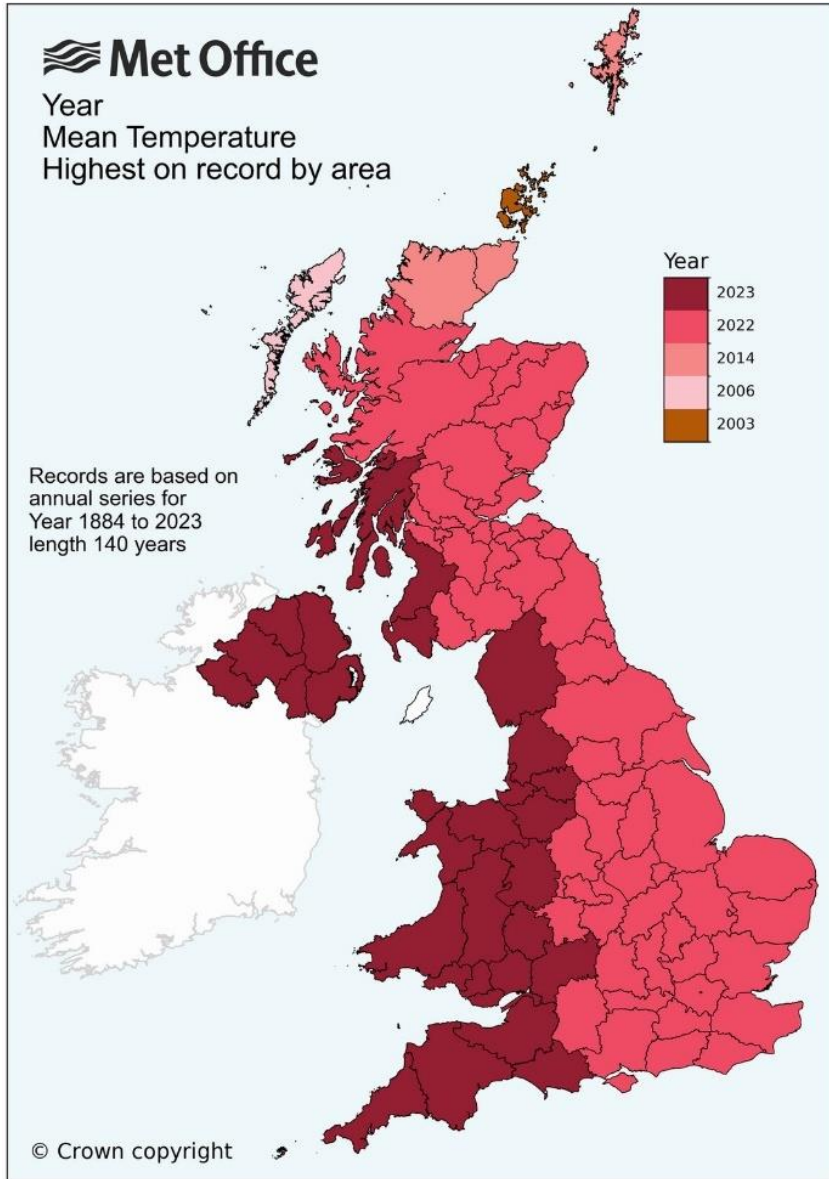
In 2023, the UK recorded its warmest June on record by a wide margin in a series from 1884, with a major North Atlantic marine heatwave a significant contributing factor.

2023 was the second warmest year on record for the UK in the series from 1884, with only 2022 warmer. Six years in the most recent decade (2014-2023) have been within the top-ten warmest in the series.

In 2023, the UK recorded its wettest September to December period since 2000 due to persistently wet and unsettled weather, including the sequence of named storms from Agnes to Gerrit.

Winds from storm Ciarán on 2 November 2023 had the potential to be as severe as from the 'Great Storm' of 16 October 1987, but the strongest winds missed the UK to the south.

In 2023, 30°C was recorded in September in the UK on seven consecutive days, for the first time on record.



Why does climate change matter?

Uncontrolled climate change will lead to higher global temperatures, rising sea levels and more extreme, unpredictable weather conditions across the world.

Climate change is a major threat to human health and wellbeing in the UK. Its far-reaching impacts can be seen in various ways, from direct effects like rising temperatures and increased flooding, to indirect consequences such as food and water scarcity, and reduced air quality. Vulnerable populations, including those with pre-existing conditions, the elderly, and underprivileged communities, are likely to be worst affected.

Here are some of the key impacts identified by the UK Health Security Agency:

Extremes of heat and cold

More frequent and intense heatwaves due to rising temperatures could lead to a dramatic increase in heat-related deaths. By the 2070s, under a high-warming scenario without adaptation, the UK could see over 21,000 additional heat-related deaths annually. Despite the warming climate, deaths from cold are also expected to rise, mainly due to an aging population.

Flooding

Climate change is making more areas prone to flooding, including those previously not at risk. Heavier rainfall and rising sea levels contribute to this threat. Flooding endangers lives and can have long-lasting negative impacts on mental health, risk of infectious diseases, and access to healthcare services.

Poor outdoor air quality

Climate change can worsen air pollution episodes by altering weather patterns and exacerbating heatwaves. Poor air quality is already a significant environmental risk, contributing to cardiovascular and respiratory diseases, and increased mortality.

Allergies

Longer and more intense pollen seasons for plants like birch and oak, as well as extended fungal spore seasons, could worsen seasonal allergies for sensitive individuals.

Drought and food security

More frequent and severe droughts driven by low rainfall and higher temperatures could disrupt

agriculture, leading to food shortages, price increases, and food insecurity.

Poor housing

Energy-efficient homes are vital for mitigating climate change and promoting healthy indoor environments. However, improvements must be implemented carefully to avoid issues like poor air quality, overheating, noise, and inadequate ventilation, which can adversely affect respiratory and cardiovascular health, as well as mental wellbeing.

Wildfires

Climate projections indicate an increased risk of larger, more severe wildfires due to hotter and drier summers. If global temperatures increase by 2°C, the Met Office projects a doubling of days with a high risk of fires in the UK, with the wildfire season potentially extending into late summer and autumn.

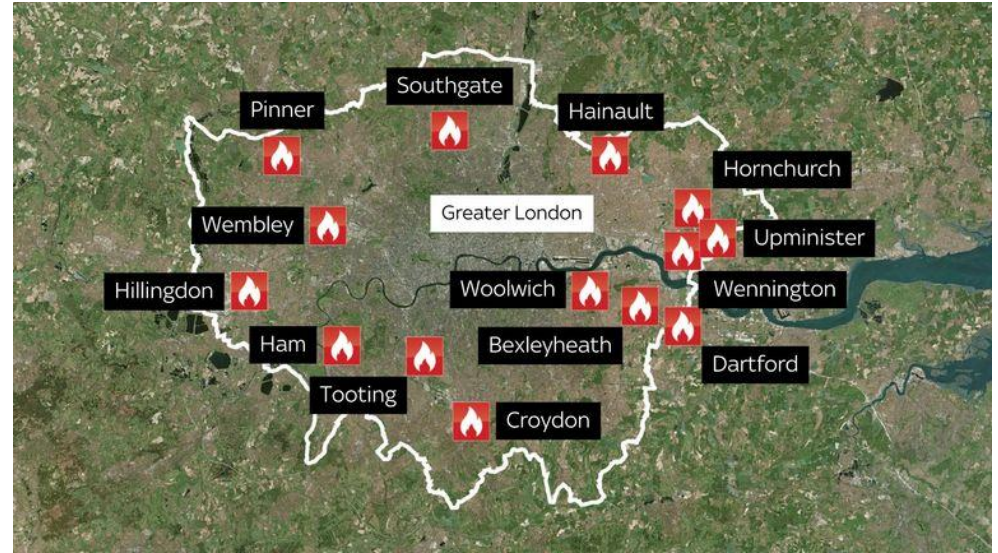
Examples in Hillingdon

The UK experienced five heatwave periods during the summer of 2022 with record-breaking temperatures of over 40°C in England. This was not an anomaly, but part of a warming trend: extreme heat events are projected

to become more likely as the climate continues to change.

In the summer of 2022, the London Fire Brigade faces its busiest day since World War two when responding to over 350 separate incidents during an extreme heatwave.

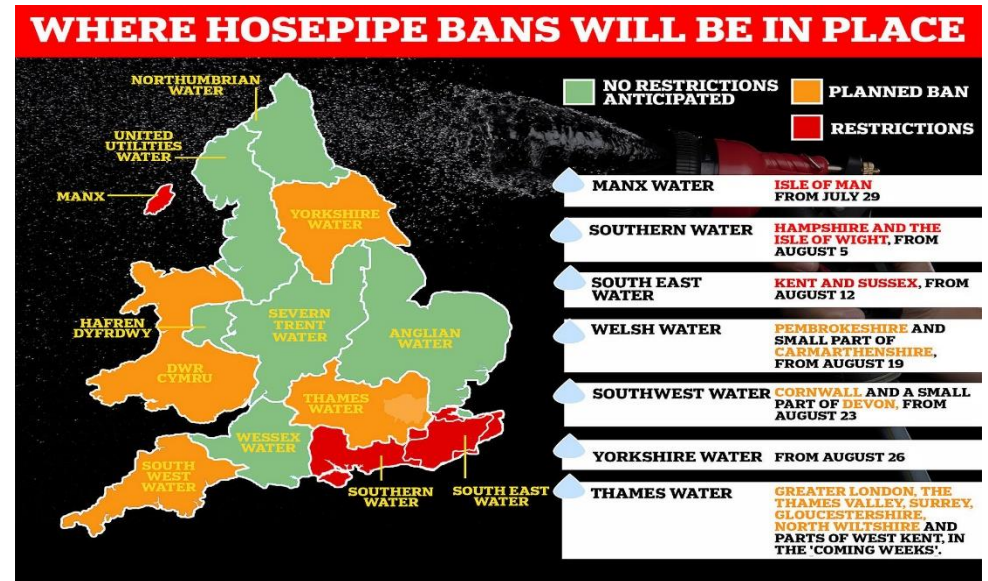
On 23 September 2024, there were floods in the Borough "The frequency of such weather events is expected to increase with changing climates which is why we've been taking steps to try and minimise risk to households in the borough including the adoption of a flood risk management plan.



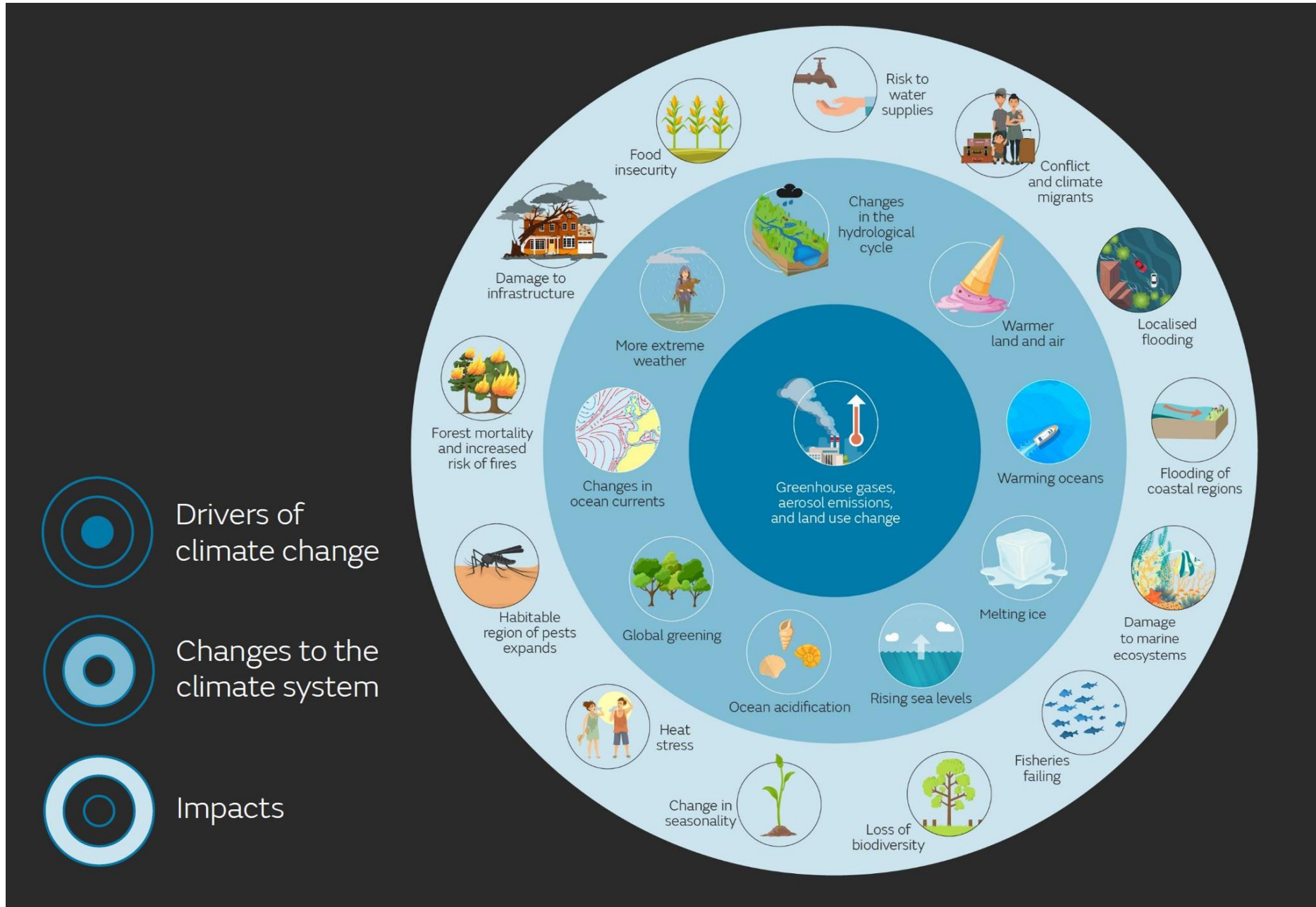
Fires around London in 2022 (source: Sky News)



Flooding within the borough in 2016



Hosepipe bans (including London) August 2022 (source: Daily Mail)



2. Our Vision

In response to the impacts of climate change we declared a climate emergency in 2020:

Looking to the future, this Council declares that there is a current global climate emergency and, as a consequence, agrees to extend the Council’s climate change targets beyond those currently set, as follows:

- i. To become carbon neutral across the Council services by 2030 and;*
- ii. To achieve 100% clean energy across the Council’s services by 2030.*

We then produced our first Strategic plan to address climate action. This plan set out 6 corporate commitments aligned with 9 Key themes to respond positively to the Climate Emergency. These underpinned our ambitious vision:

To become the greenest London borough, to protect and enhance the environment, and to provide a brighter prospect for future generations.

The 6 Corporate Commitments

To lead and inspire our residents, businesses and schools to reduce their own carbon emissions.

To become ‘Carbon-Neutral’ by 2030.

To achieve 100% clean electricity across the Council’s services by 2030.

To raise awareness and develop the potential of young people to respond to the challenge of the climate emergency.

To enhance opportunities for biodiversity across the borough and particularly in urban areas.

To remain open to the opportunity to go further, to be innovative and creative to exceed the stated goals wherever possible.

In addition, at a meeting of the Council in November 2021, the following motions on climate change were approved:

- i. *Ensure that, where practical and cost effective, all the council's procured services are net carbon zero by 2035.*
- ii. *Support and work with businesses and organisations towards making the entire borough net zero carbon by 2050;*

This Council also commits to increasing its accountability and transparency on climate change action by:

- iii. *Proactively including young people in the process, ensuring that they have a voice in shaping the future;*
- iv. *holding an annual ‘people’s assembly’ with residents and relevant organisations to discuss and shape revisions to the climate change action plan.*

The 9 Themes	
Objective	Theme
C1	Community Leadership
C2	The Council’s Own Operations
C3	Building better places
C4	Using and Producing Clean and Green Energy
C5	Waste Management
C6	Climate Change Adaptation and Mitigation
C7	Carbon Offsetting
C8	Sustainable Transportation
C9	Transparency, Communication and Reporting

Our Carbon Neutral Target

At the heart of the Plan is the Council’s ambition to be carbon neutral by 2030. The target relates to our Scope 1 and 2 emissions associated with all our operations. It applies to the assets that are:

*under our direct operational control and financial management.
(C2.1, Strategic Action Plan)*

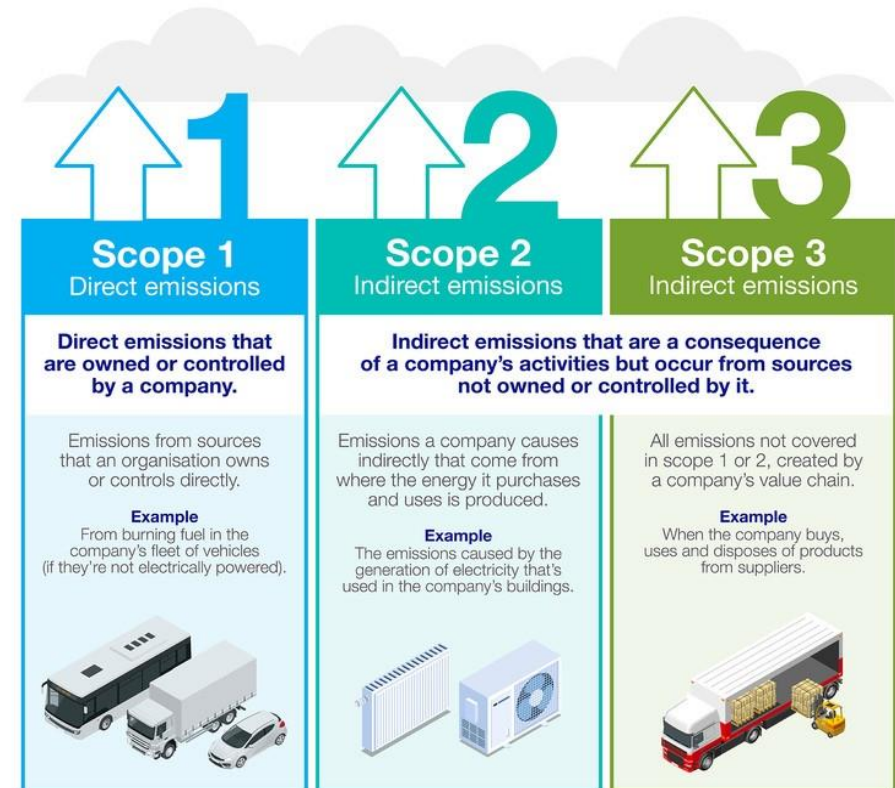
There are 5 key components that contribute to the Council’s carbon neutrality target associated with the Scope 1 and 2 emissions and considered later in this report:

- i. Emissions from corporate assets where the Council has operational control **and** monetary management of energy purchasing
- ii. Emissions from operational transportation (including grounds maintenance)
- iii. Carbon reduction from sequestration e.g. coverage of tree canopies on Council land
- iv. Carbon reduction from renewable energy production e.g. solar panels
- v. Carbon reduction from the purchasing of green energy

The Council separately made a commitment for Scope 3 emissions to be carbon neutral by 2035.

What are Scope 1, 2 and 3 carbon emissions?

The three scopes are a way of categorising the different types of greenhouse gas emissions created by a company, its suppliers and its customers.



Source: <https://www.nationalgrid.com/stories/energy-explained/what-are-scope-1-2-3-carbon-emissions>

3. Our Progress

We undertake an annual review of our performance set against the detailed objectives that stem from the 9 key themes. This is presented to Cabinet for scrutiny and review, with further actions or priorities set and agreed as necessary.

Progress is also scrutinised by Residents' Services Select Committee on an annual basis.

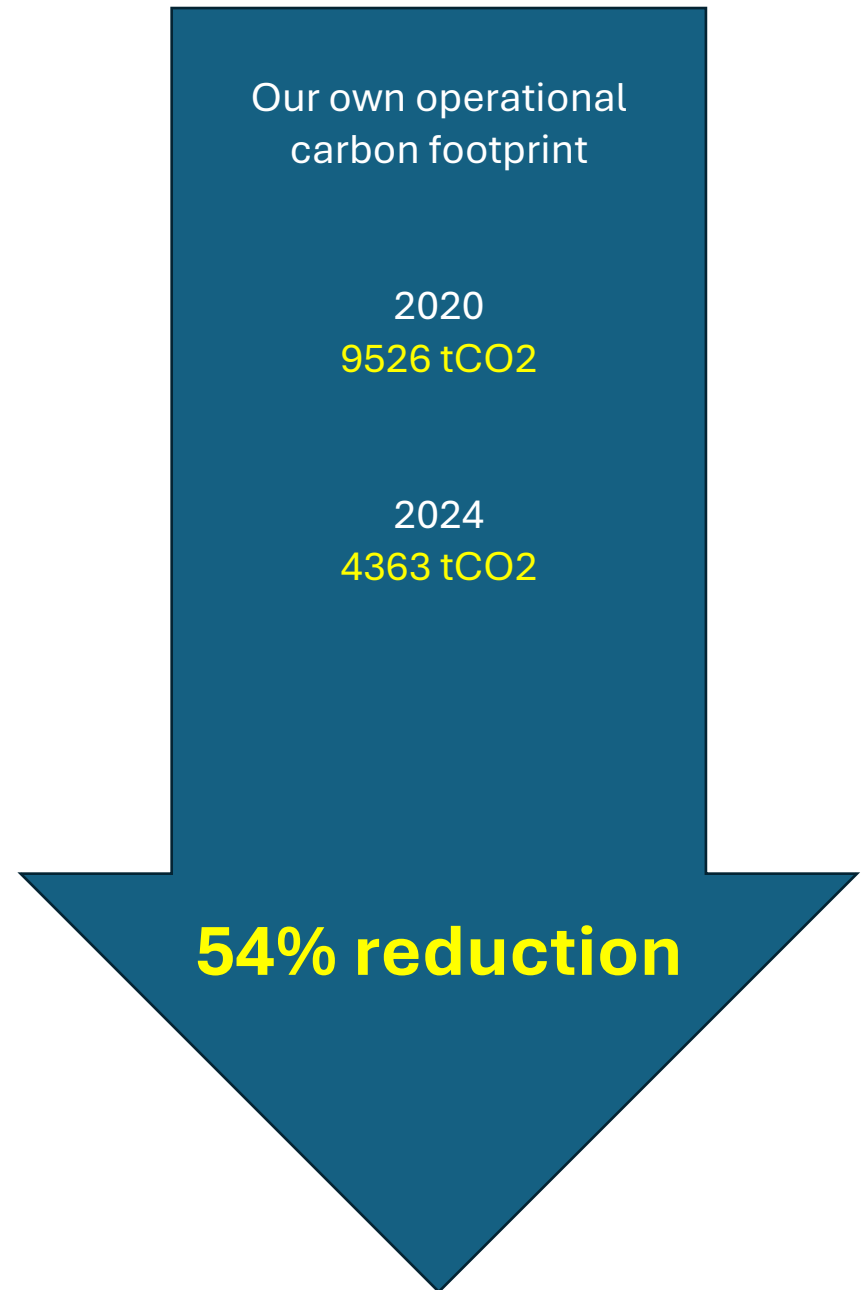
Our climate change activity is also considered by the Corporate Management Team and embedded within the work of officers.

This structure allows us to respond positively to the changing environment which has become progressively challenging since the declaration of the climate emergency.

The challenging financial climate means we have not been able to deliver on all our aspirations and we have focussed on delivering tangible outcomes that we have direct control over.

However, the coming pages, starting with a high-level analysis of the key themes, reveal extremely positive progress from the starting position of 2020. There is a lot more to be achieved and this is reflected in priorities for the forthcoming plan period (2025-28)

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Theme	Progress	Commentary
Community Leadership	Further Development Required	The focus has been on getting the Council's 'own house in order' which means further development of the work on community leadership is required. In 2024 the Council started regular meetings with the Friends of the Earth and wider Council objectives reflected in the Plan have a significant resident facing element, e.g. sustainable transportation, flood risk work, waste management activity. We will further develop educational resources to assist our communities with recording and reducing their own carbon footprints.
The Council's Own Operations	Very Positive	The progress against this objective is very positive. The main area of development is to capture all this positive work in the context of the Plan which will allow for trajectory analysis of the carbon neutral target. In turn, this will allow for the appropriate focus of attention and will assist with informing a pipeline of projects to achieve carbon neutrality.
Building Better Places	Very Positive	Progress against this objective is very positive. The Council implements the policies of the London Plan which are highly progressive in securing zero carbon development. This is also the route to securing Section 106 funds to facilitate actions elsewhere in this plan. Work is necessary to determine whether the current cost of offsetting 1tCO ₂ (i.e. £95) from new development is sufficient.
Using and Producing Clean and Green Energy	Positive	The cost of electricity from certified renewable energy sources has become cost prohibitive. Procuring clean energy where feasible will be prioritised for the Plan period. Work on renewable energy generation at our sites is ongoing and should these begin to be delivered it is expected that a 'very positive' report will be set out in the next review period.
Waste Management	Very Positive	Progress against the waste management objectives is very positive. The Plan effectively mirrors the Waste Management strategy and there is alignment between the objectives. Development is required to capture the waste management progress in the context of climate change.

<p>Climate Change Adaptation and Mitigation</p>	<p>Positive</p>	<p>Progress against this objective is positive largely due to the work on air quality and the Local Flood Risk Management Strategy alongside other flood risk related activity. There is more to be done on water efficiency and public facing campaigns, and these will be programmed as part of this Review. A climate change adaptation and mitigation action plan will be developed as part of 2025-28 Plan period.</p>
<p>Carbon Offsetting</p>	<p>Positive</p>	<p>Progress against this objective is positive largely due to the Council progressed tree planting and ongoing green space management. More work is required to align this work with the objectives of the plan with particularly focus on the biodiversity work which needs to be progressed further.</p>
<p>Sustainable Transportation</p>	<p>Positive</p>	<p>Progress against this objective is positive due to the work with TFL, schools' campaigns and development of the cycle strategy. Further work on a sustainable transportation strategy needs to be programmed to ensure all the sub objectives of this theme are given attention. Importantly the work against this theme needs to be captured in the context of this Plan so as to ensure there is alignment against the climate change objectives.</p>
<p>Transparency, Communication and Reporting</p>	<p>Further Development Required</p>	<p>This is an area where progress needs further development. Annual progress reports are available and public scrutiny undertaken through the work of the Residents' Services Select Committee. Work will be undertaken for the new Plan period to ensure more resources and reporting is available on our website.</p>

<p>Very Positive</p>	<p>Most actions within the theme have been progressed well</p>
<p>Positive</p>	<p>Some actions within the theme have been progressed well with others programmed</p>
<p>Moderate</p>	<p>Progress has been made against a small number of the actions</p>
<p>Further development required</p>	<p>Further development against most actions in the theme is required or information is not captured.</p>

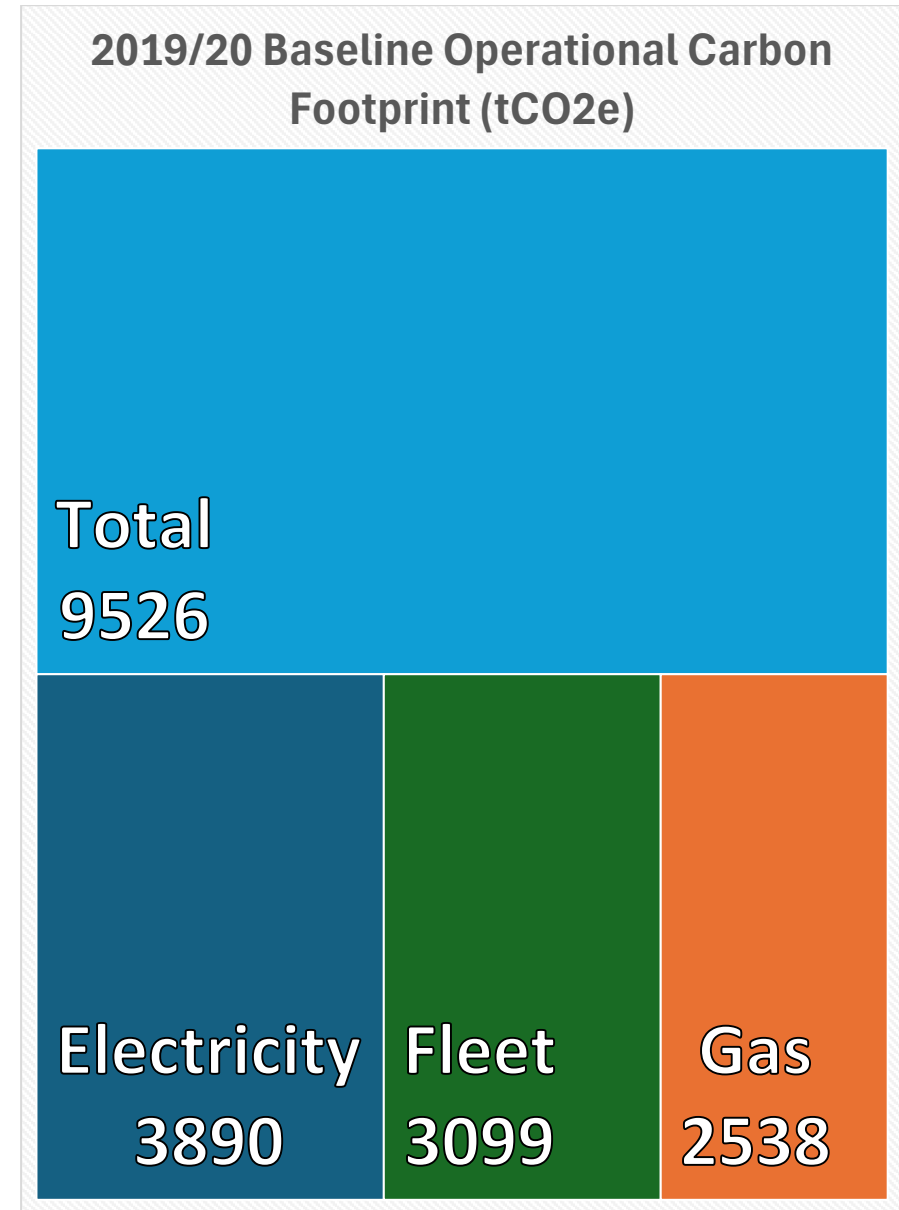
4. Our Own Operational Carbon Footprint

Measuring our own carbon footprint was a major part of the original Plan. We intended to lead by example and to be able to demonstrate effective carbon reduction progress.

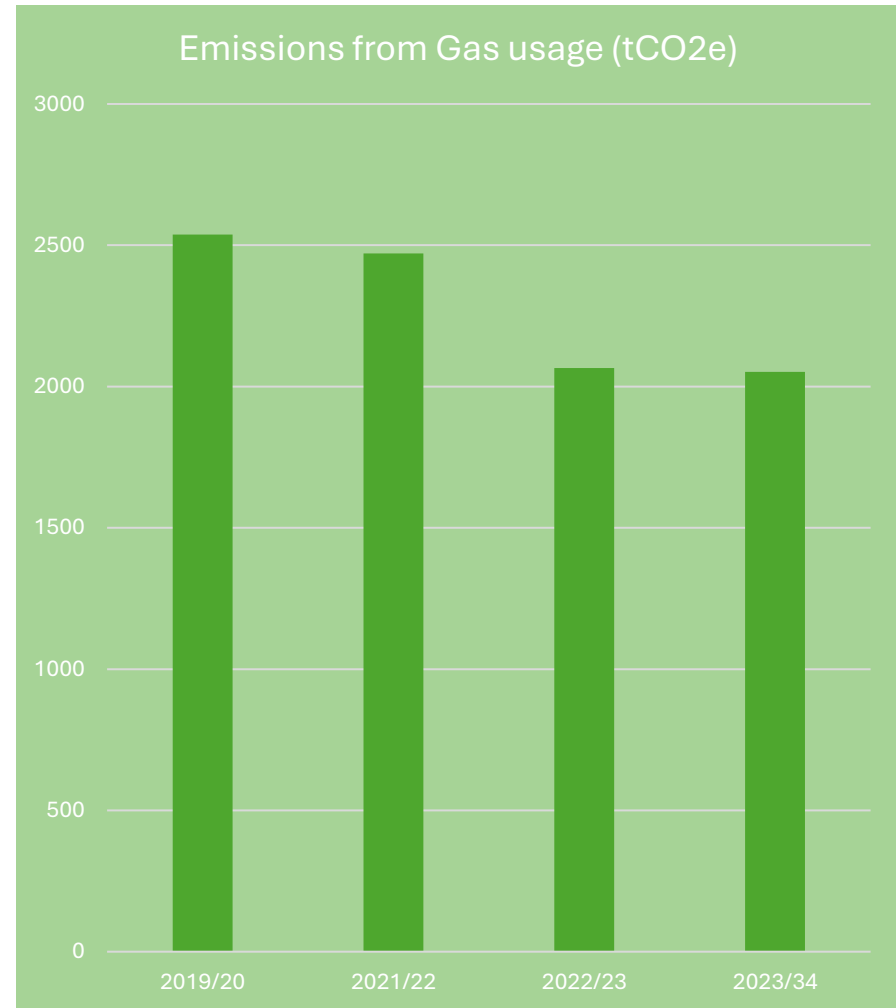
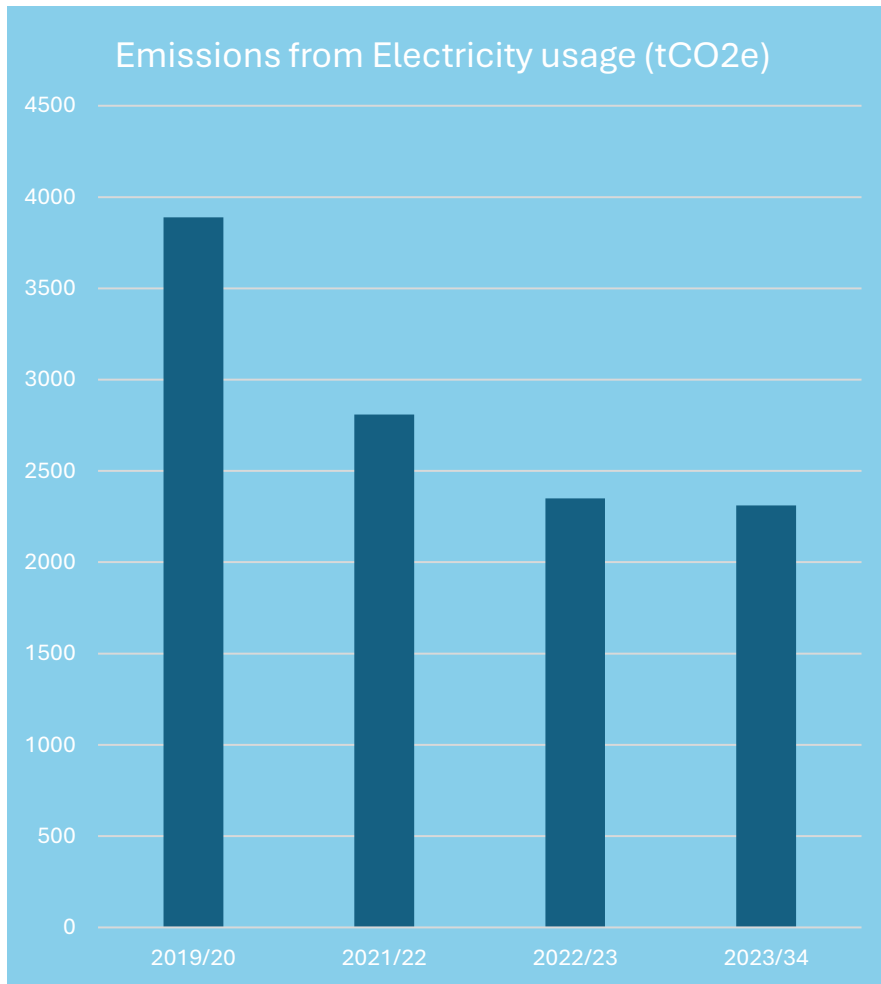
Measuring the starting point on which to assess progress is vital. The baseline carbon footprint reported in the 2021 plan has been subject to further refinement and analysis; this was reported in the 2022 Annual Review.

The 2021 baseline in the original Plan factored in emissions from our own housing stock which did not reflect the carbon neutral target.

Leaving this data in the baseline but not recording it subsequently would misrepresent any subsequent savings. Consequently the 2022 Annual Review provided an updated baseline which is the position on which our carbon neutral target is based. The baseline position is recorded here for ease of reference.



As set out in the graph below, we have made considerable carbon reduction progress since 2021. Progress is linked to direct interventions such as the installation of low and zero carbon technology, improved building performance and usage, as well as through the disposal of assets.



Progress related to emissions from electricity usage is more pronounced than with gas consumption. This is largely down to the availability of a wider range of improved technologies and because electricity consumption is a

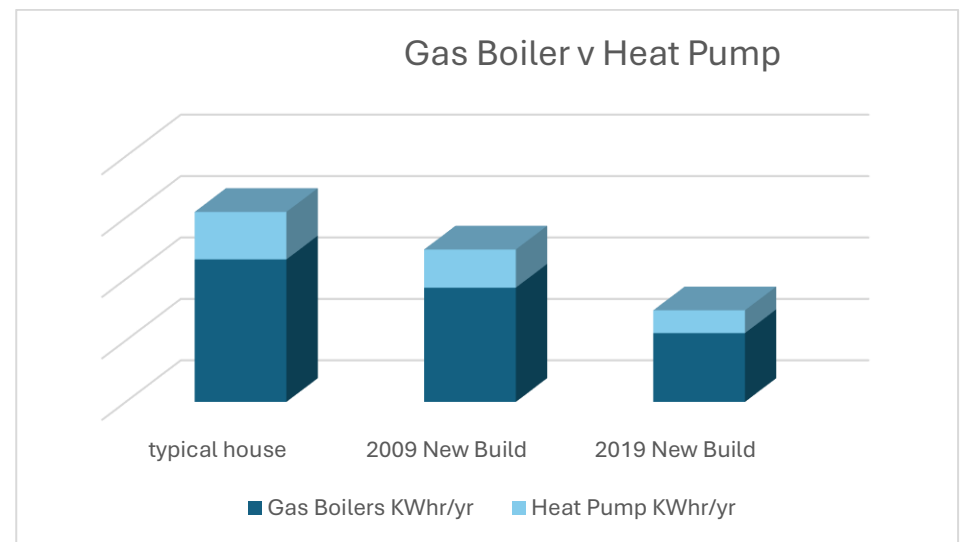
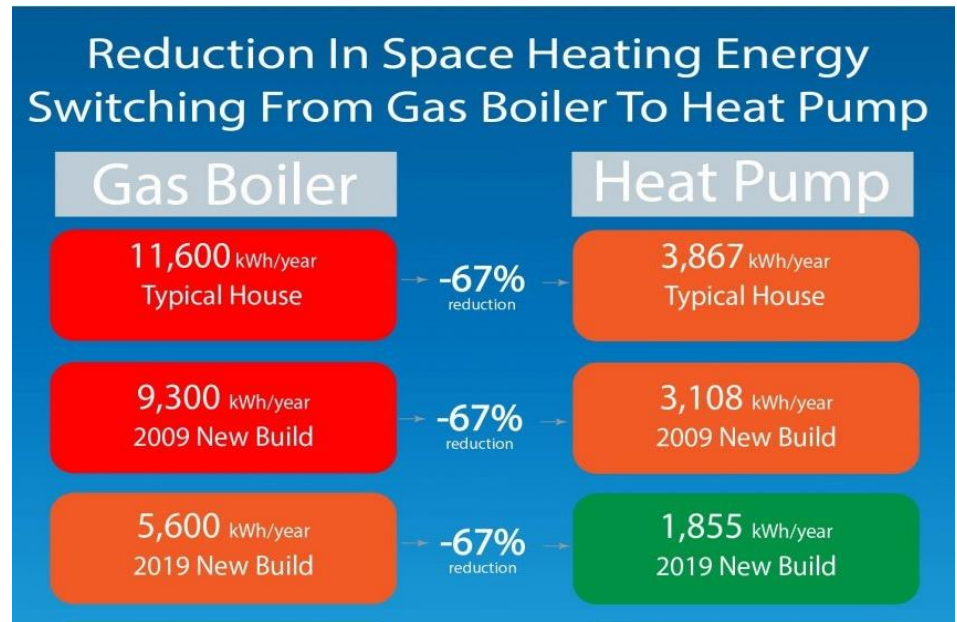
‘Scope 2’ emission and therefore benefits from improvements within the national grid.

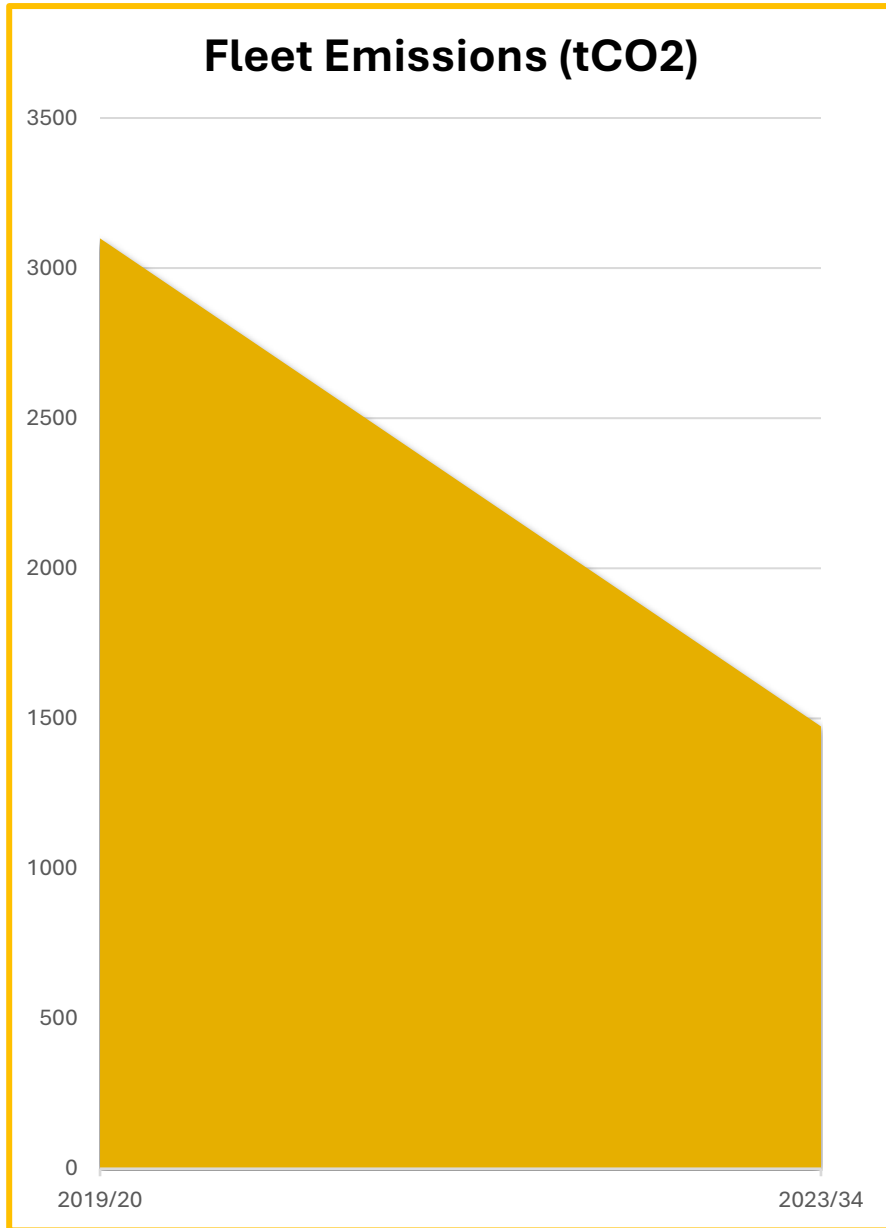
Emissions are calculated from point at which the energy source is generated. For example, the energy produced through the burning of gas within a boiler occurs directly within the appliance; conversely electricity is generated from various locations and sources across the UK before being distributed through the National Grid.

Converting the gas burned into a carbon footprint is straightforward and consistent. Carbon from electricity produced in the national grid is more complex to calculate and is dependent on the ratio of renewable energy produced to that from fossil fuels.

As renewable energy becomes more commonplace in the grid, the amount of carbon associated with generating a unit of electricity is reduced. This reduction is reflected in the DEFRA carbon conversion factors used to calculate carbon emissions. If the National Grid conveyed 100% of electricity from renewable sources, our carbon footprint from our electricity supplies would be 0tCO₂.

This is an important factor in managing our assets moving forward and is one of the reasons why air-source heat pumps, which use electricity, are now preferred to gas boilers for all heating requirements.





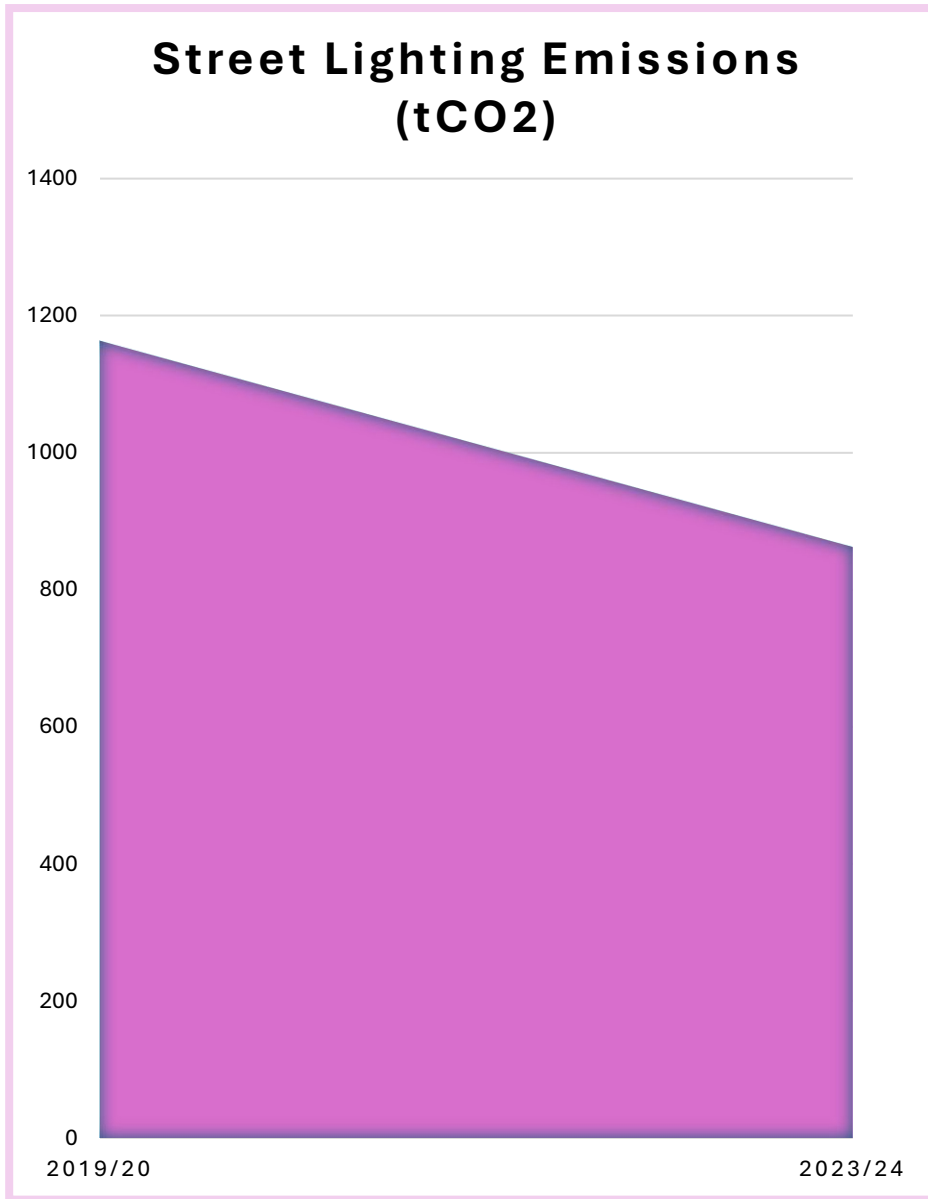
We have over 200 vehicles in our fleet. These relate to our need to undertake a significant range of duties, including refuse collection, street cleaning, housing repairs, passenger services, green space management and mobile library services.

This results in over 2,000,000 miles being driven a year.

We have focused a lot of attention on improving the efficiencies within our fleet vehicles. This includes reducing vehicle mileage through improved routing and switching to more efficient vehicles with lower emissions.

A large scale fleet replacement plan is underway which will see the older diesel units removed and replaced with cleaner technology as well as electric powered vehicles. We have not pursued low emission vehicles at all costs though as larger electric vehicles are relatively new, scarce and consequently exceptionally expensive. This demonstrates a prudent balance of improving the fleet within a responsible funding envelope.



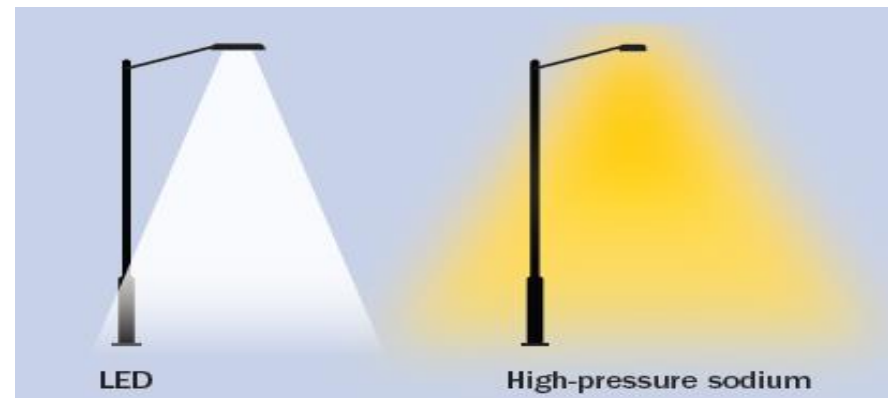


As the highway authority, we have a legal responsibility to maintain approximately 25,000 street and subway lights, as well as 3,000 illuminated signs, bollards and zebra crossings.

We have replaced all our old high pressured sodium lamps in the streetlighting with LED lanterns also also replaced 1000 illuminated bollards with non-illuminated types.

LED lighting not only reduces carbon emissions but also has lower running costs (i.e., uses less electricity) and improves maintenance performance.

We will continue to review the streetlighting options, recognising that they still constitute a large portion of our carbon footprint.



Public Sector Decarbonisation Scheme

A major workstream currently underway concerns the Public Sector Decarbonisation Scheme (PSDS). The PSDS provides grants for public sector bodies to fund heat decarbonisation and energy efficiency measures.

The Council secured £13,751,385 through Phase 3 of the PSDS. The funds, with match funding from Section 106 secured from developers, will deliver large-scale carbon reduction interventions at:

- Civic Centre, Uxbridge
- Hillingdon Leisure Centre
- Highgrove Leisure Centre
- Winston Churchill Theatre and Hall

The Civic Centre work involves removing the gas-based heating system and replacing it with more efficient air source heat pumps, secondary glazing, and additional insulation.

The Civic Centre has always been a prominent factor in our carbon footprint. The baseline data from 2020 shows it to have a considerably higher carbon footprint—more than the nine next highest buildings combined.

The PSDS project is highly innovative and provides the much needed interventions within the Civic Centre; an asset that was recognised in the original Strategy as being a difficult proposition due to its age and listed status.

Rank	Building	tCO2
1	Civic Centre	1,867
2	Breakspear Crematorium	540
3	Uxbridge Library	162
4	Harlington Road Depot	129
5	Battle Of Britain Museum & Visitor Centre	95
6	The Pembroke Centre	80
7	Colham Road 3 Residential Home	74
8	Hatton Grove Residential Home	69
9	Queens Walk Resource & Wren Centre	63
10	Winston Churchill Hall	59

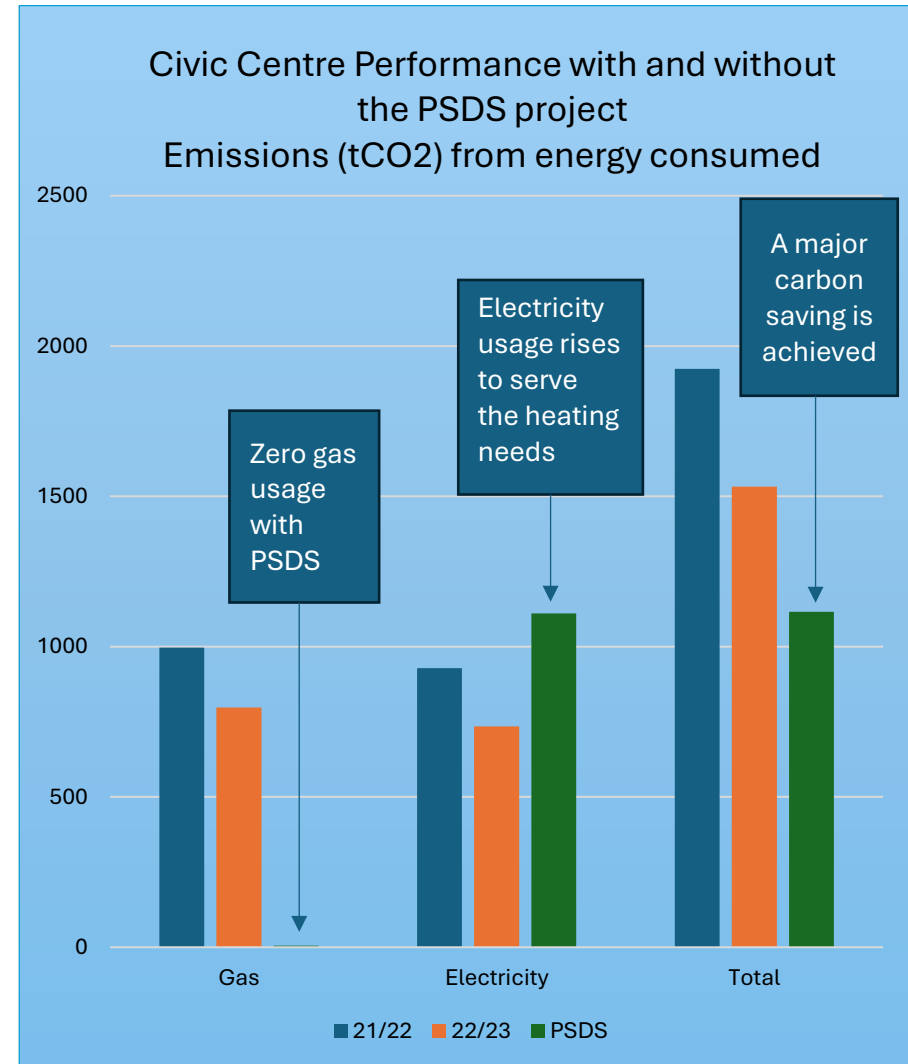
The graph opposite shows the forecasted improvements to the Civic Centre with the PSDS project intervention. The electricity supplies increase with the PSDS project (green bar in the middle) but there is no third bar on the left hand side (gas). This is because all gas boilers are to be removed.

The PSDS project will therefore result in a major impact. Importantly, the interventions will continue to bear fruit. The move from inefficient gas boilers (scope 1 emission) to state of the art electricity based air source heat pumps (scope 2 emission) means that that the carbon footprint of the building will continue to fall in line with decarbonisation of the National Grid.

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By 2030, the Civic Centre would have a lower carbon footprint than in 2024 even without any further interventions.



Overall Reduction (tCO2e)

2019/20

9526

2023/24

4363

5. Wider Climate Action Progress

Tree Planting

Hillingdon is one of the greenest boroughs in London and home to a significant number of trees. Ruislip Woods National Nature Reserve is London’s single largest woodland in London covering c300 hectares.

We also have extensive tree coverage throughout our numerous parks and open spaces as well as along many of our streets.

All trees absorb carbon dioxide (known as carbon sequestration) and are therefore important in tackling climate change. Trees are also important in creating a diverse environment for wildlife and promoting biodiversity.

In addition, urban tree planting can have significant benefits in cooling, managing surface water, and removing pollutants helping to improve the environment.

To support our aspirations to become the greenest London borough we have undertaken extensive further planting.

Year	Trees Removed ¹	Total Trees Planted
2020/21	213	14,288
2021/22	193	11,655
2022/23	90	17,295
2023/24	55	8,378 ²
Total	551	51,616
<p><i>1 – Trees removed are general because of being categorised as ‘dead, dying or dangerous’</i></p>		
<p><i>2 – Planting season is between November and March. Tree planting numbers are not yet available for winter 2024.</i></p>		

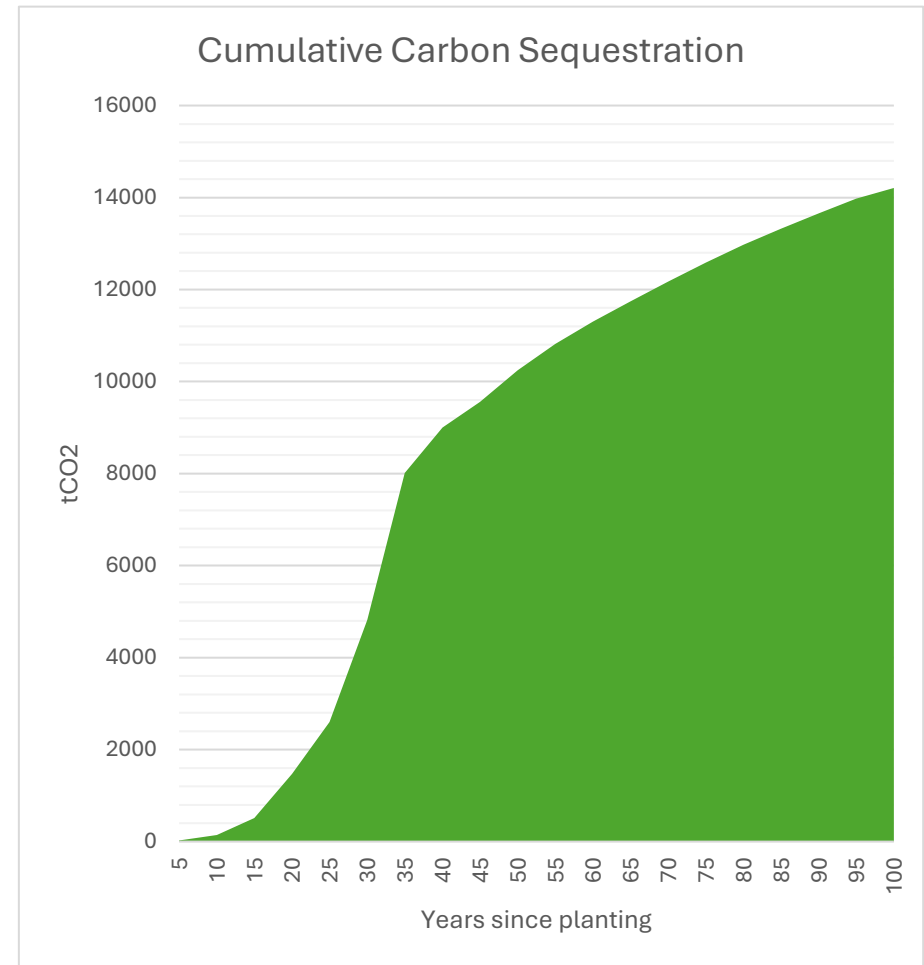
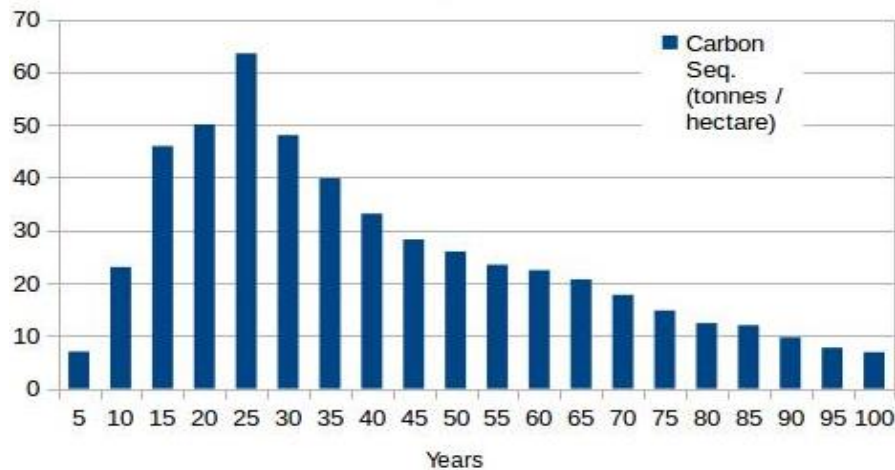
Trees and Carbon Sequestration

Determining the carbon benefits of the trees planted is a complex task. It is not straightforward to equate one tree with an amount of CO₂ absorbed and then multiply by the number of trees planted.

Trees capture very little CO₂ in their formative years. To the contrary, the delivery of the saplings, soil disturbance through planting, and the use of machinery create a carbon footprint of their own. Large-scale tree planting can start life with a negative carbon footprint.

However, over time, the extent of carbon absorption increases significantly, peaking at around 25 years of growth. It is estimated that 1 hectare of woodland will capture approximately 60tCO₂ for the five-year period between years 20 and 25.

Carbon captured every 5 years from 1 hectare of woodland (not cumulative)



Applying the broad formula to the planting of our c50,000 trees, overtime the cumulative capture of carbon will be significant, c14,000tCO₂. These figures are estimates based on the Woodland Code and further detailed analysis is being undertaken to determine the extent of carbon capture of newly planted trees, as well as the annual capture from all our existing woodland.

Green Space Management

Open and green spaces play an invaluable role in tackling climate change and creating climate-resilient places. They also have significant benefits for the natural environment, human health and well-being. Natural areas provide physical activity, social interactions, and stress relief opportunities. Urban green spaces can lead to improved mental and physical health. They also have direct impacts by storing carbon, aiding cooling and assisting with surface water management.

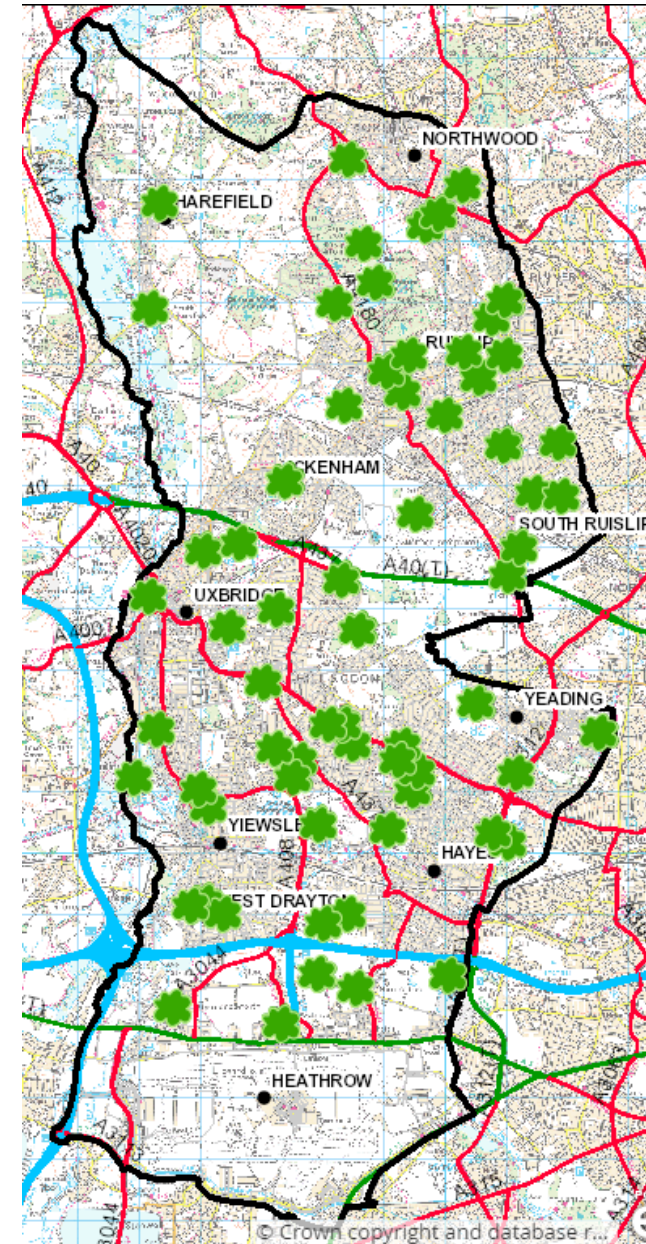
We recognise the importance of our parks, as reflected in the 2024 announcement that we retained 67 Green Flag awards. An award that recognises parks and green spaces of the highest calibre.

This is fantastic news for residents who continue to see investment, maintenance and improvements to the green spaces which make our borough so pleasant.

We're committed to creating a green future for residents and nature, and this is reflected in the continued prioritisation of our parks as key assets for all.

The Green Flag Awards show these parks meet the highest international standards so we don't take for granted having achieved the top spot nationally for 12 years in a row.

Cllr Eddie Lavery, Hillingdon Council's Cabinet Member for Community & Environment



Climate Change Resilience and Adaptation

The climate has already changed. As set out above, the climate data for the UK shows significant variations from those historically recorded. The UK has wetter periods, more intense weather events such as storms, and warmer and drier periods.

This places a great deal of strain on environmental and social conditions, which ultimately have negative economic impacts. Climate change adaptation and resilience are, therefore, about responding to the irreversible impacts that have already happened.

In the context of climate change, the Intergovernmental Panel on Climate Change (IPCC) defines adaptation as the process taken to “adjust to the actual or expected climate and its effects”. Resilience to climate change is defined as the capacity to prepare for, respond to, and recover from the impacts of climatic events while incurring minimal damage to societal wellbeing, the economy and the environment.

The running of our green spaces, the planting of trees, and the management of flood risk all help to make us more resilient and adaptable to the changing climate. Tree planting helps to increase areas of cooling, outdoor space provides environmental protection and reduces overheating, and managing flood risk responds to more impactful weather events.

Flood Risk Management

In the context of flood risk management, we have a statutory role as the Lead Local Flood Authority (LLFA) to manage and coordinate flood risk action.

We recently adopted our Local Flood Risk Management Strategy, which outlines how we intend to manage flood risk and undertake a leadership role.

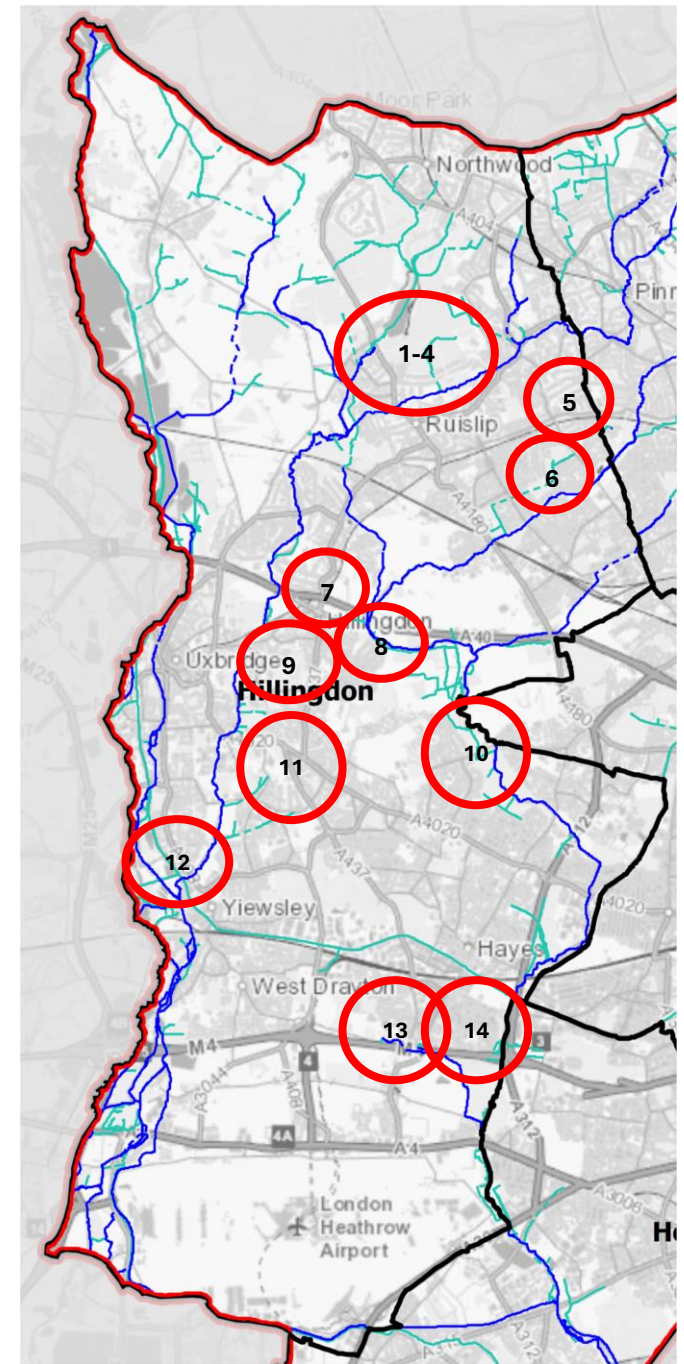
Our role as an LLFA includes the need to identify and deliver new projects to help reduce flood risk. We use funding from external sources to identify and prioritise areas for flood risk management.

The details on the following page outline some of the projects we have delivered or are currently developing.



No.	Name of Flood Risk Project	Stage
1	Park Wood SSSi NFM* Phase 1 and 2	Phase 1 completed Phase 2 under development
2	Pinn Meadows NFM	Under development
3	Kings College Road Rain Gardens	Due to commence
4	Property Level Protection (50+ properties) (Environment Agency Project)	Nearing completion
5	Eastcote Rain Gardens	Completed
6	Bessingby Park Flood Attenuation	Completed
7	A40 Infrastructure Flood Alleviation	Feasibility Stage
8	Elephant Park Flood Attenuation	Completed
9	Court Park Flood Attenuation	Completed
10	Kingshill Flood Alleviation	Feasibility Stage
11	Colham Green Flood Alleviation	Feasibility Stage
12	River Colne Fish Passage	Feasibility Stage
13	Frogs Ditch Catchment	Under development
14	Croyde Avenue Estate	Completed

*NFM: Natural Flood Management

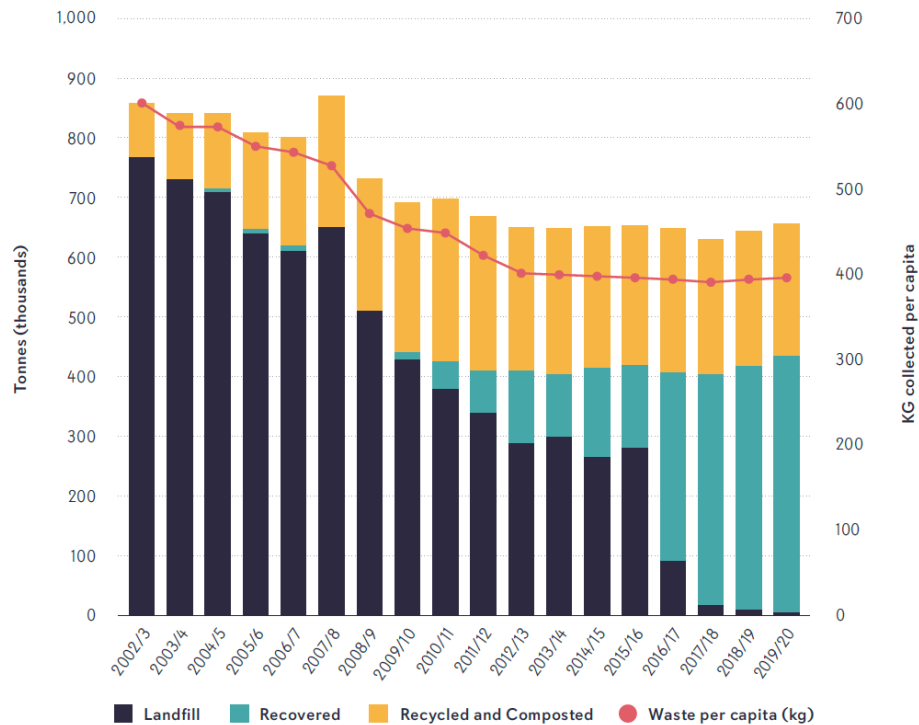


Waste Management

We are one of six authorities under the waste management umbrella of the West London Waste Authority (WLWA), a statutory waste disposal authority responsible for disposing of our waste.

We work with residents and businesses to help reduce waste in accordance with the waste hierarchy. Some of the positive work we have undertaken to reflect the higher levels of the hierarchy are set out on the next page. Once collected, though, the waste is disposed of by the WLWA.

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The graph shows the significant reduction in waste sent to landfill. This is because the WLWA partners with operators of two energy recovery facilities. This means waste that historically was buried in a hole in the ground is now recovered for energy production:

Around 96% of West London’s rubbish is sent to two Energy Recovery Facilities (ERFs) to generate energy.

Most is sent to the Severnside Energy Recovery Centre (SERC), located beside the river Severn just north of Bristol. The facility is part of the Authority’s Residual Waste Services Public Private Partnership Contract with SUEZ UK Limited. The facility can treat 400,000 tonnes of rubbish and has its own bottom ash treatment plant to turn the ash into an aggregate with a recognised end product status for use in construction projects.

The other facility is located near Heathrow Airport and is run by Lakeside Energy from Waste Ltd. Our arrangement is with Viridor Waste Management, one of the co-owners of the Lakeside facility.

Energy from Waste facilities offer a modern treatment process. Your waste is used to generate energy in the form of heat and power (electricity), instead of coal, oil, or gas.

(<https://westlondonwaste.gov.uk/where-your-waste-goes>)

Leading by example on waste collection

We have improved our own recycling services at the Civic Centre and at Harlington Road Depot with waste electrical equipment (WEE) collections available to all staff.

Working with Businesses

We have liaised with almost 3000 businesses about the importance of food waste collections with most also now have waste segregation facilities

Changes to waste service management system allows better monitoring and education of improved waste segregation

Improved waste segregation services at New Years Green Lane civic amenity site

Working with Schools

We have undertaken school visits in 2023 to educate on waste reduction behaviours and importance of recycling

We have engaged with 28 schools on food waste recycling, including signing up to our services to support with collection issues

Supporting West London Waste Authority

We Promote and encourage attendance at repair workshops in partnership with Traid, Restart party, Hillingdon Friends of the Earth, Freegle and Hillingdon's Doctor Bike, ReLondon and WLWA.

We hold two annual repair events to allow residents to learn how to extend the life of equipment.

Supporting Residents

We have engaged 50,000 residents and secured 12,000 new signatories to our food waste collection services.

We have organised 13 roadshows and engaged with 3,500 residents to educate on food waste, recycling and WEE collections.

We have collected almost 10 tonnes of small electrical waste diverting it away from general waste streams

Planning and New Development

The London Plan sets out the planning policy for all new major development to be zero-carbon. This has greatly improved the new building stock within the borough.

On average, new residential development is estimated to have approximately 60% lower carbon emissions on site than an equivalent building regulations-compliant scheme.

Developments that don't achieve the zero-carbon standard on-site are required to contribute to our carbon offset fund, depending on the shortfall.

This results in a much-improved building stock and provides a funding source to allow us to make carbon savings in our buildings, such as the Civic Centre.

Biodiversity Net Gain

We are also now implementing the recent planning changes to secure biodiversity net gain which will help in responding to the decline of our natural environment.

We will continue to develop how to exploit the biodiversity net gain opportunities within the borough to maximised benefits for our own natural environment

London Plan Policy SI 2 Minimising greenhouse gas emissions

A Major development should be net zero-carbon. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:

- 1) be lean: use less energy and manage demand during operation
- 2) be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly
- 3) be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site
- 4) be seen: monitor, verify and report on energy performance.

B Major development proposals should include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy.

Heathrow Expansion

The 2021 Strategy reaffirmed our opposition to runway expansion at Heathrow Airport. We will continue to oppose runway expansion and increases in air traffic movements due to the extensive negative environmental and social impacts.

Sustainable Transportation

As an outer Borough, we have a relatively high car ownership rate compared to the rest of London. There are strong public transport links into the centre of London, but elsewhere, there are limitations. North-south connections are poor, and there are limited options connecting the Borough to places outside of London. The car will remain a vital part of life while public transportation and other sustainable modes of travel are limited.

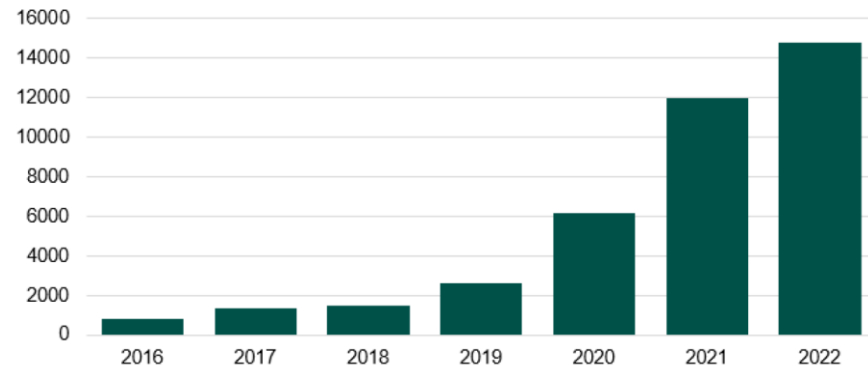
This means that actions to enforce a dramatic modal shift away from the car are likely to have significant negative social and economic impacts while alternatives are not in place. It is, therefore, necessary to carefully balance the need to improve alternative options for our residents and businesses while recognising that private vehicle travel remains an important choice.

The Elizabeth Line has improved the connection into London and to Heathrow Airport, greatly reducing vehicular traffic on the road. However, facilities and options across the borough still need to be improved.

Electric Vehicles

To assist with these options, we launched our Electric Vehicle Charging Strategy in 2023. This strategy sets out our initial approach to improving infrastructure on our own sites. Combined with progressive planning policies to secure vehicle charging points in new developments, there is much greater coverage of the facilities to support and influence the demand for electric vehicles.

Registered plug-in vehicle registration across the borough (cumulative)

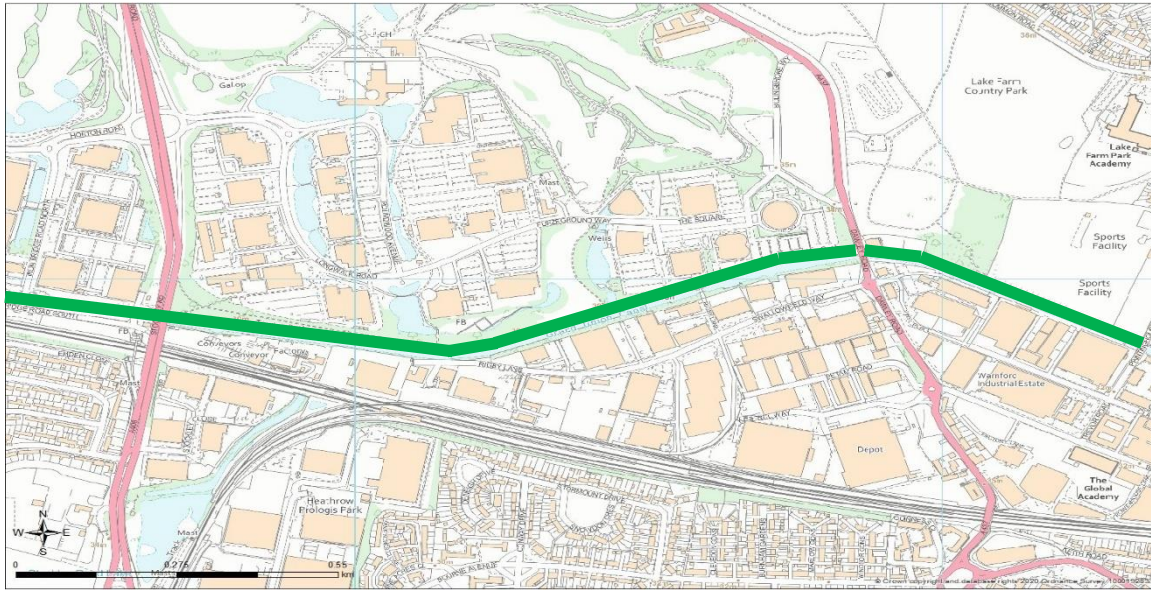


Cycling

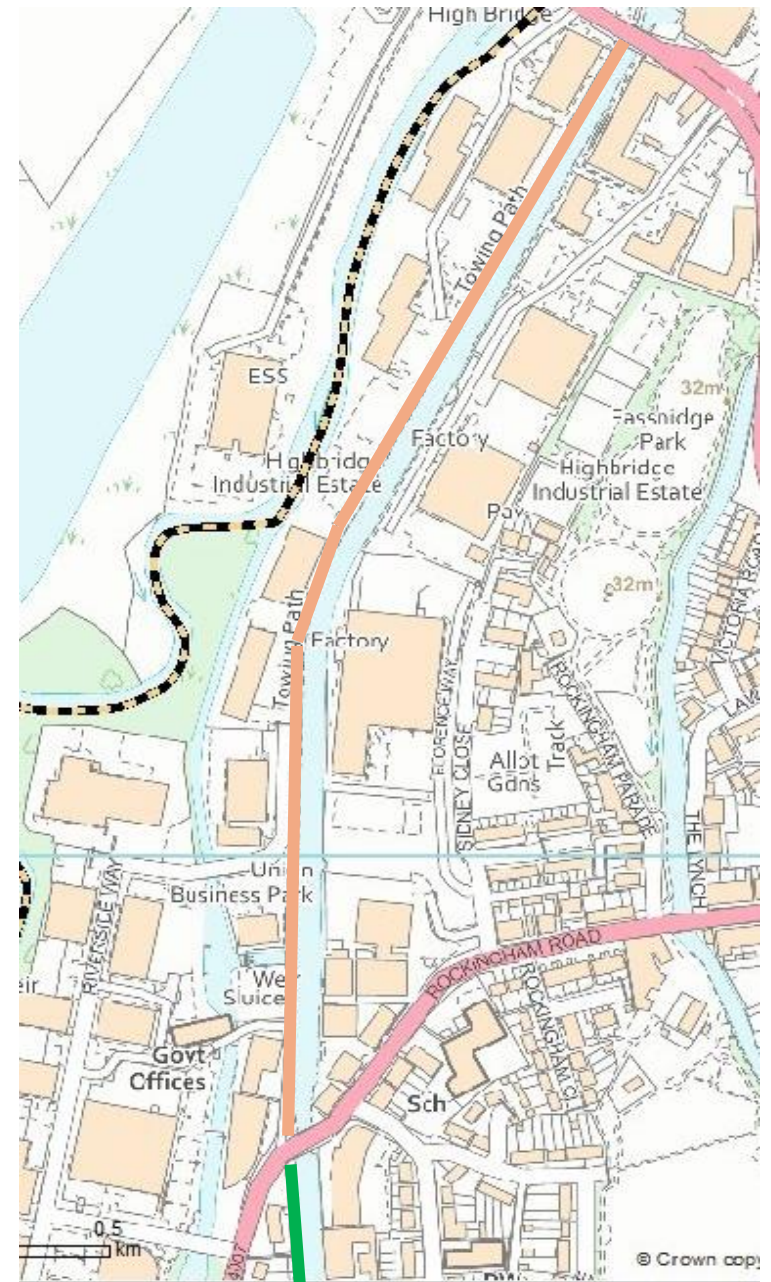
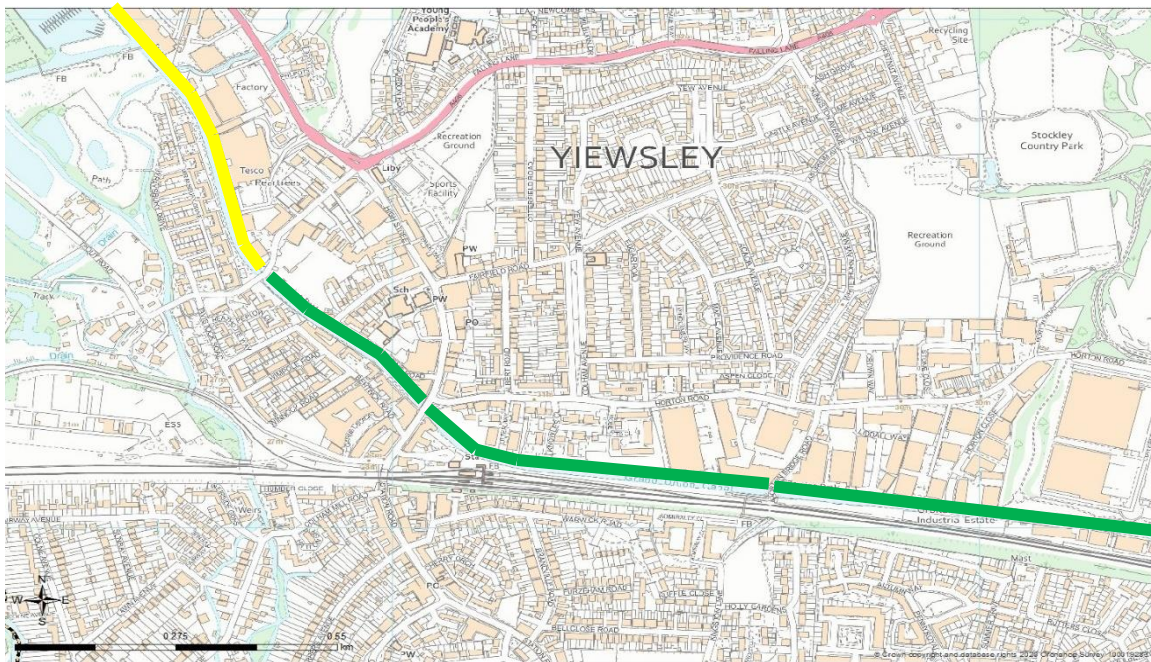
In early 2024, we consulted on our new cycling strategy, which builds on our previous positive progress. This strategy promotes six new cycling routes within the borough and supports those routes already provided or being developed.

The School Travel and Road Safety (STaRS) Team also offers training to all our schools, allowing pupils to learn the necessary skills to cycle for travel. Cycle skills sessions are also provided for children and adults at Pield Heath School Cycle Track between April and October. Dr Bike events run throughout the year allowing residents to have minor bike repairs and checks free of charge in numerous locations around the borough.

Through TfL's Travel for Life programme, schools are encouraged to develop school travel plans. The STaRS team works with schools to develop and promote the plans in communities through campaigns to support active and safe cycling.



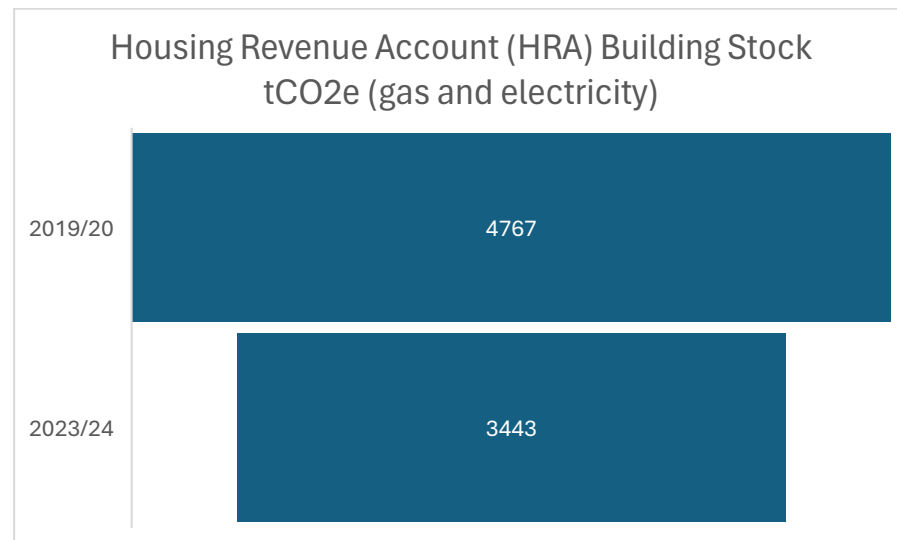
Some of the lengths of the Grand Union Canal towpath (for cyclists and pedestrians) that have been improved (green), being improved (brown), or planned to be improved (yellow).



Carbon Neutral Borough

Our own carbon neutral target is set out above and relates to our operational work. In terms of buildings, it covers assets within our financial **and** operational control. We have a range of other assets that do not trigger one of those criteria. For example, we don't have complete control over the energy used within our housing stock but we have embarked on a significant suite of improvements that has resulted in a reduced carbon footprint as set out below.

The work completed on these assets all contribute to the aspiration of having a carbon neutral borough in line with the Government 2050 target. We also recognise that these works improve the performance of the buildings, reduce energy costs for our residents and promote a healthier lifestyle.

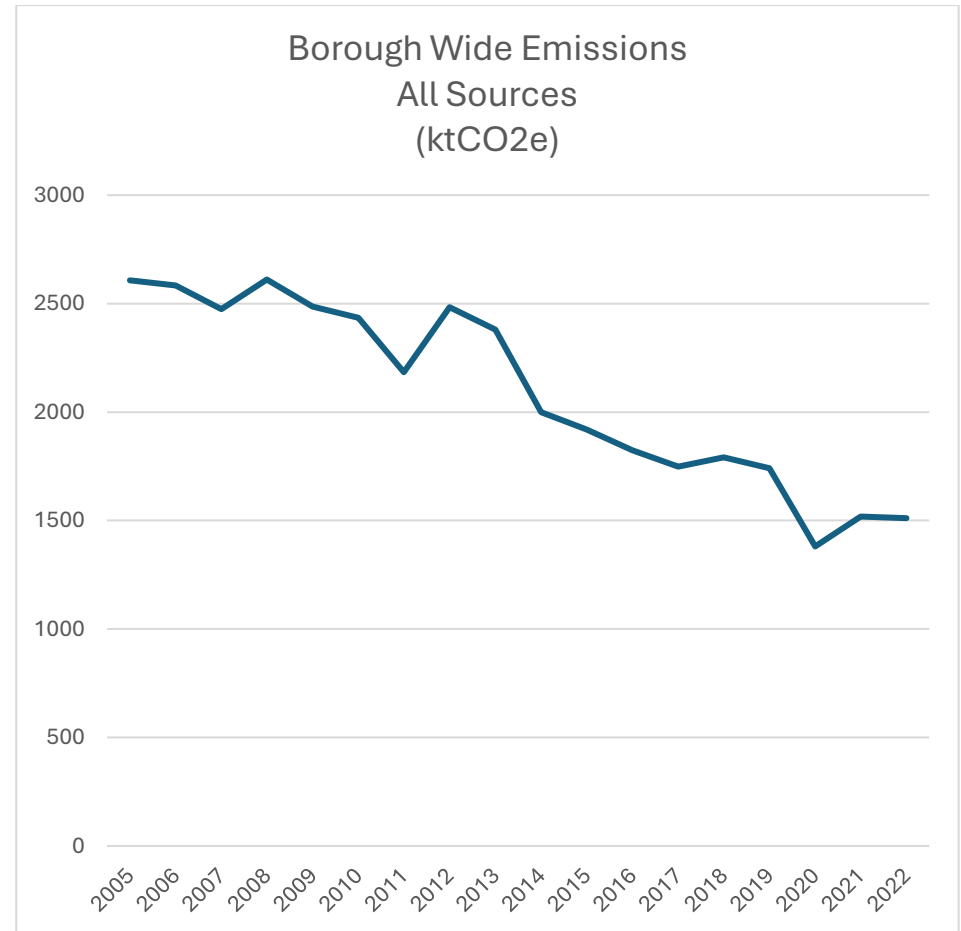
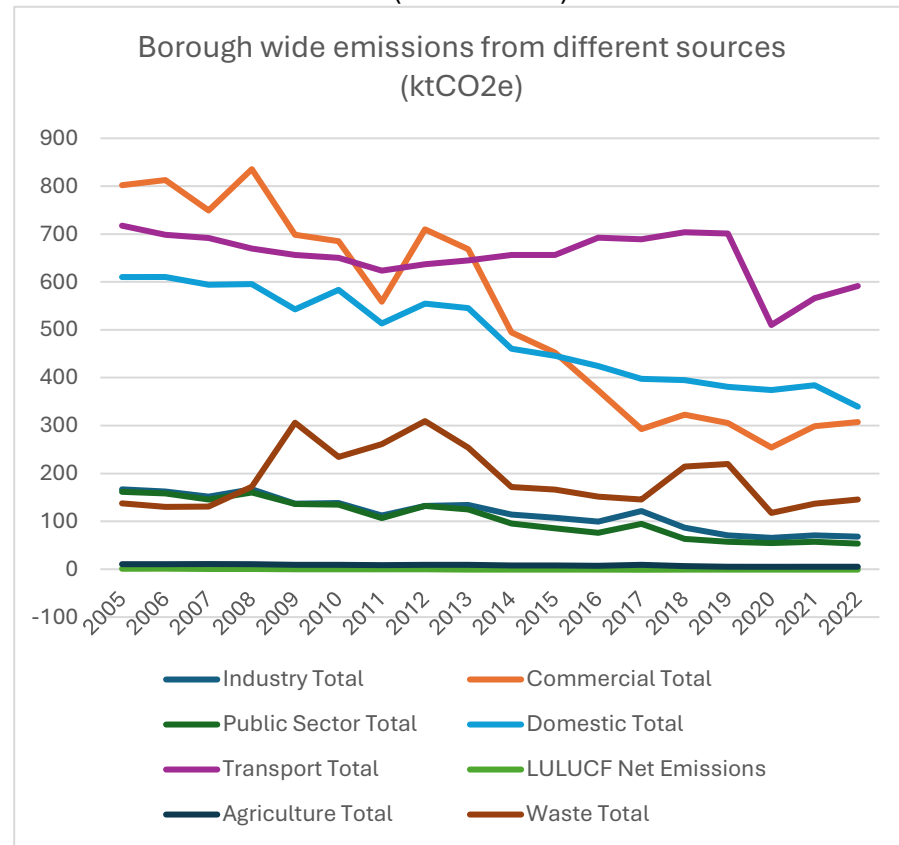


Some of the improvements we have delivered in our building stock:

- Intelligent lighting within car parks (Cedars, Blyth Road, and Grainge's)
- Improved LED communal lighting in low and medium-rise blocks.
- 920 homes upgrades through the Green Homes Grant
- 433 homes with upgraded EPC certificates
- 1144 individual measures through the Green Homes Grant
- Cavity wall insulation delivered through the Social Housing Decarbonisation Fund
- 573 efficient boilers as part of the 2022/23 replacement programme
- 2,006 efficient boilers replaced in the 2023/24 replacement programme
- 1,917 efficient boilers replaced in the 2024/25 replacement programme underway

Across the wider borough, the emissions are inevitably significant. Heathrow's location in the south, along with many strategic transport routes, results in an above-average borough-wide carbon footprint.

Despite this, and consistent with the UK carbon footprint, the graph below shows improvement across the borough. The emissions are associated with the industrial, commercial, public sector, domestic, forestry, agriculture and waste sectors. The totals are shown in ktCO₂e (1000tCO₂e).



We do not have control over these emissions, but we can use our position to encourage others to take action. Clarifying the emissions across the borough and then taking positive action will be programmed for the medium to long term.

Data from: <https://www.gov.uk/government/statistics/uk-local-authority-and-regional-greenhouse-gas-emissions-statistics-2005-to-2022>

6. Actions for 2025-28

Overview

The 2020 Action Plan contained ambitious objectives covering a wide range of activities. As set out above, progress has been highly positive despite the challenges facing the Local Authority.

Our priority remains to continue to focus resources and attention where they are most impactful. This review allows us to set out what we consider the essential workstreams to continue meeting our commitments and achieving our vision.

The Action Plan set out below is a refinement of the previous version and sets out work to be undertaken over the short (1 year) to medium term (2 – 3 years).

The Action Plan has also been updated to reflect the motions approved by Council after the adoption of the previous Action Plan

The proposed plan will inevitably be subject to change and review through the annual reporting process alongside scrutiny by the Cabinet and the Residents’ Services Select Committee.

Action Plan

The original strategy contained a range of action plans from which detailed actions would emerge. The following remain integral to the Climate Action Strategy and will continue to be priority workstreams.

Action Plans
Corporate Operations Action Plan
Reducing Emissions in Corporate Buildings
Fleet Management Action Plan
Waste Management Strategy
Carbon Offsetting Action Plan
Large Scale Renewable Energy projects
Climate Change Adaptation and Mitigation Action Plan
Flood Action Plan
Tree and Green Space Management Plan
Sustainable Transport Strategy
Electric Charging Action Plan
Cycle Strategy
Air Quality Action Plan

Guide to review

Theme	Theme headings remain consistent with the 9 key themes
Ref	New Actions are given a ‘R’ prefix to differentiate from the original plan prefix of ‘C’
Action	This provides a description of the Action to be taken within this plan period.
Commentary	Provides a brief statement of the relationship between the stated action and any previous iterations
Timeframe	The intended scope of completion/delivery for the Action

Community Leadership

Ref	Action	Commentary	Timeframe
R1.1	To provide a dedicated online resource to provide information on how to record your carbon footprint alongside actions that can help reduce it. The resource will also outline options for external funding and how to improve an individual’s environmental footprint.	Merged C1.2, C1.9 and C1.12	25/26
R1.2	To promote and support volunteer groups with dedicated climate and environmental objectives.	Hillingdon Friends of the Earth regularly engaged with bi-monthly meetings to continue.	Ongoing
R1.3	To bring together community and business groups, along with other interested parties as part of a ‘people’s assembly’ to discuss and shape revisions to the review of the Climate Action Plan in 2 years time.	This action overlaps with the motion of the Council in November 2021 for a ‘People’s Assembly’	2026

R1.4	To use our unique access to communities through, for example, residents' associations, to support and promote climate action.	Revision to C1.3 delivered Through existing engagement channels	Ongoing
R1.5	During 25/26, the Council will engage all schools within the borough and support them in the publication of a climate action plan reflecting the objectives of this Strategy, with annual progress reports to be provided thereafter.	Revision to previous objectives (including C5.6) to rationalise and focus the output.	25/26
R1.6	We will prioritise actions for vulnerable residents when considering climate adaptation and resilience	Revision to C1.6 to focus action through climate adaptation and resilience where it is needed most	26/27
R1.7	During 25/26, the Council will undertake a 'Cleaner Greener' public engagement campaign, which raises awareness and promotes climate action.	Amalgamation and revision to previous actions C1.11, C.1.13, C6.4, C6.6, C7.3	25/26

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The Council's Own Operations

Ref	Action	Commentary	Timeframe
R2.1	All our operational assets under our direct operational control and financial management will be accredited as carbon neutral by 2030. Other assets we own but not under our control will be decarbonised in line with prevailing legislation and, with the availability of additional funding, go even further.	Action Retained	Ongoing Trend analysis to be delivered in 2025.

R2.2	By 2030, our fleet will be powered by the cleanest available technology available within budget constraints and suitable for the operational requirement.	Action Retained	Ongoing
R2.3	Ensure all corporate plans and strategies, particularly regarding estate management and property disposal, evaluate and mitigate for climate impacts.	No change	Ongoing
R2.4	Undertake feasibility studies and act to install small-scale low and zero carbon technologies in our own building stock.	Action Retained	Ongoing
R2.5	To ensure procurement practices align with the objectives of this Plan	Action Revised for short to medium term recognising the Council motion that 2035 is the target date for Scope 3 emissions	Ongoing
R2.6	To ensure our streetlighting assets are targeted for further carbon reductions, using new low energy and renewable technologies.	Action Retained	Ongoing

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Building Better Places

Ref	Action	Commentary	Timeframe
C3.1	To use the development plan system to ensure all new major developments will be zero carbon.	Action Retained	Ongoing
C3.2	Consider new planning policies to ensure all non-major new development is also zero carbon.	Action Retained	Ongoing

C3.3	To ensure no new development is built in high- and medium-risk flood risk areas unless absolutely necessary and only when flood risk management is properly understood and mitigated in accordance with council flood policy.	Action Retained	Ongoing
C3.4	To ensure all new development is environmentally responsible, including protecting existing designations and sites of interest.	Action Retained	Ongoing
C3.5	To ensure that all new major development contributes to and supports the goal of sustainable transportation, such as the promotion of public transport, cycling, or EV charging.	Small amendment to align with Planning Policy	Ongoing
C3.6	To ensure that wherever possible during development, existing trees are retained. Where they cannot be retained, new trees should be planted to facilitate carbon gain.	Action Retained	Ongoing

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Using and Producing Clean and Green Energy

Ref	Action	Commentary	Timeframe
R4.1	To ensure and certify that the Council secures energy supplies from low or clean forms of generation by 2030 [add] <i>where feasible</i> .	Revised Purchasing renewable energy at any cost would not be a prudent use of public money and would have an unlikely impact on the grid availability of green energy. A more prudent approach is necessary.	Ongoing

R4.2	To investigate opportunities for large scale electricity generation from Council owned land (e.g. solar farms).	No change	Ongoing
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Waste Management

Ref	Action	Commentary	Timeframe
R5.1	Lead by example with a clear waste collection and sorting strategy for the Council’s own operations with year on year targets for improvements.	No change	Ongoing
R5.2	Support the West London Waste Authority on waste reduction campaigns.	No change	Ongoing
R5.3	Work with businesses to reduce waste productivity and to provide more opportunities to customers to reduce and recycle their waste.	No change	Ongoing
R5.4	Encourage and support residents and communities to avoid, reduce, reuse, and recycle waste in that order.	No change	Ongoing
R5.5	To ensure all waste is managed sustainably and there is transparency and information on processes the Council utilises and destination of waste.	No change	Ongoing

Climate Change Adaptation and Mitigation

Ref	Action	Commentary	Timeframe
R6.1	To develop a climate change adaptation and mitigation action plan.	No change	26/27
R6.2	To review the Council’s water consumption for its operations (such as green space watering, depot operations and corporate buildings) and put in place measures to reduce consumption	Revised to be more feasible	Ongoing
R6.3	To ensure the Council’s flood resilience and management work incorporates a changing climate and that the Council’s own land and property decisions consider the need to make space for water.	No change	Ongoing and reflected in the recent Flood Risk Strategy

Carbon Offsetting

R7	Action	Commentary	Timeframe
R7.1	To develop an offset strategy to develop local solutions to any remaining residual carbon emissions from council operations.	No change	26/27
R7.2	To develop a tree and green space management strategy that supports and accounts for the offsetting objectives and commitments.	No change	25/26
R7.3	Understand and increase current carbon sequestration through increased planting and changes to green space management.	No change	25/26
R7.4	Increase the number of trees, particularly in urban areas to complement objectives to improve air quality and promote urban wildlife.	No change	Ongoing

R7.5	To exploit opportunities to increase carbon sequestration to maximise opportunities for biodiversity and flood risk management	No change	Ongoing
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Sustainable Transportation

Ref	Action	Commentary	Resources
R8.1	Produce a sustainable transportation strategy that reflects the objectives and commitments in this strategy.	No change	26/27
R8.2	Work with TFL to improve bus connectivity and services.	No change	Ongoing
R8.3	Identify opportunities for improved cycleways, cycle paths and public rights of way.	No change	Ongoing
R8.4	To promote cycling opportunities through campaigns and awareness events.	No change	Ongoing
R8.5	To secure improved cycling facilities across the borough.	No change	Ongoing
R8.6	Review the electric charging vehicle action plan in line with changing demand and data.	Reviewed We have adopted an EV charging strategy that needs to be reviewed to ensure it aligns with demands.	26/27
R8.7	To ensure the Council’s Air Quality Action Plan aligns with the objectives in this plan to ensure a safe transition to increased levels of cycling and walking in urban areas.	No change	25/26

Transparency, Communication and Reporting

Ref	Action	Commentary	Timeframe
R9.1	To ensure transparency in the Council’s measuring of carbon footprints with clear details on methodologies as well as the outputs. All details will be available online.	No change	25/26
R9.2	To publish an annual progress report of the objectives of this plan	No change	Annual (Sept/Oct)
R9.3	To establish a People’s Assembly to consider review of the Actions necessary to meet the Corporate Climate Commitments.	Revised	2026 (Oct/Nov)

Amendments to Actions

Several actions from the original strategy have not been taken forward into this plan period. Many of these actions have been merged or reconciled into fewer, more focused actions, particularly in relation to the Community Leadership section. Where actions from the original strategy have not been taken forward, for example where Government funding is not available to pursue them at this time, then it important to note they are not removed in their entirety. These actions will be:

- (1) reconsidered as part of the annual review
- (2) pursued within the plan period if opportunities arise, for example where Government funding becomes available
- (3) be reconsidered for the next review period (2028 onwards)



Cedar of Lebanon
Cranford Park, Hayes
100 to 200+ years of age

**Appendix - Consultation on
Hillingdon Draft Climate Action Plan
2025 to 2028**

**Comments from
Hillingdon Friends of the Earth**

January 2025

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Hillingdon Friends of the Earth – who are we?

Hillingdon Friends of the Earth (HFoE) has been a local group affiliated to Friends of the Earth (FoE) for more than 35 years. Following an initiative from central FoE, HFoE set up a Climate Action Group in January 2020 with over 60 people attending the first meeting. Subsequently FoE consolidated the original local groups, and the climate action groups into “local action groups”, leaving Hillingdon FoE with an enhanced brief but a continued focus on local climate action.

FoE make resources available¹ to help those groups lobby and work with their local councils. Those resources include research undertaken by FoE alone, or in partnership with organisations such as Ashden². Some research is specific to each local authority so relevant figures specific to Hillingdon are easy to find³.

To better understand and inform ourselves about issues relevant to the climate emergency, we set up a number of sub-groups looking at specific issues, including energy, waste, trees & land use, transport and buildings & homes. This response to the consultation on the Hillingdon Draft Climate Action Plan 2025 to 2028 has been informed by this material and these activities, and so involves contributions and insights from several people.

We were pleased that Hillingdon Council declared a climate emergency in January 2020, and then adopted its Strategic Climate Action Plan in July 2021. At that time the Council had a dedicated climate change resource, David Haygarth, Climate Action Manager. That first version of the Plan incorporated much of our feedback and is a strong document. When the Climate Action Manager’s role was ended the Borough experienced a long period when progress on meeting the actions and objectives in the Plan seemed minimal. Our group had little dialogue with the Council despite many offers to meet and assist with implementing the Plan. This made the publishing of the plan feel like just a paper exercise. More recently Ian Thynne (Head of Environmental Specialists - Hillingdon Council) has been meeting with us to hear feedback on Council climate progress and hear our offers of assistance. We hope the meetings have not commenced merely to tick boxes owing to the imminent review of the Plan.

We would like to think that there will be processes under which we can continue to make suggestions as more detailed plans are developed, and that the same engagement will be possible for all parts of the community. We continue to hope that the knowledge we can draw on from the wider FoE organisation, and the partners they work with, is recognised as something that might be helpful, so that those developing future plans do not hesitate to contact us for comments, insights and so on when appropriate.

Please also see Appendix 1: Friends of the Earth Local Action Group Charter extract.

¹ See for example [Get your Council to adopt a Climate Action Plan](#)

² See [Affordability, co-benefits and carbon saving: the top Climate Actions for councils](#)

³ See [“How climate friendly is your area?”](#) – entering a Hillingdon Borough postcode gives information for the Borough

Hillingdon Friends of the Earth general comments on consultation document

We stated the points below in our response to the first Strategic Climate Action Plan in 2021, and need to reiterate them now:

Some of the commitments in the draft Climate Plan are to deliver a net zero or carbon neutral outcome. Whilst it is reasonable to have this as a goal to achieve, it should not be the final goal. The ambition should be to work towards as near zero carbon emissions as possible rather than only net zero. Net zero could still hide significant carbon emissions because it relies on being able to deliver good results on carbon offsetting. A continued reduction of emissions towards zero must always be the aim, given the problems we have indicated in our comments, on Theme C7 in particular, of too much reliance on offsetting.

- Addressing the nature emergency, as well as the climate emergency, is essential.
- Actions should also help to deliver sustainable development.
- The ambition should be to work towards greenhouse gas emissions as near zero as possible, with targets for the whole Borough, not just the Council.
- Action is needed because of the impact of climate change everywhere in the world, not just because of the impact in Hillingdon.
- Full and effective engagement with all parts of the community, including vulnerable people, particularly people with Protected Characteristics as defined by the Equality Act 2010, must underpin how actions are developed.
- The lead Council officer must have access to the resources needed to ensure all Council decisions take account of the climate and nature emergencies.

Brunel University of London is one of the three largest employers in the borough. The Council should show a bottom-up level of support for effecting a shift in Brunel's market positioning to be an eco-university. The changes to immigration law which mean postgraduate students cannot bring family to the UK has led to a loss of income for Brunel. This leads to job losses. This leads to less money in the local community. This leads to increased political pressure for lower Council Tax. This means Hillingdon Council has less money to spend on climate action. Brunel could focus on making its local offer to Hillingdon residents more appealing. For example, by buying two pages of advertising space in Hillingdon People. This has Borough-wide reach and could encourage Hillingdon residents to consider Brunel as a way of getting local solutions to the climate crisis.

The document should be improved by having numbered paragraphs. This will allow references to the document for questions in Hillingdon Full Council meetings and enable discussion as people can easily locate what is being discussed.

Accessibility to the Plan should be improved by editing it using the [Plain Language Commission's free download section](#) 15 tips, in particular Point 6.

The Planning Department should actively engage in a training and education programme about what the Borough will be like with 2 degrees warming. The use of the physical space in Hillingdon will need to change depending on how far past the Paris commitments the planet gets. This means that planning decisions need to recognise that groups with different protected characteristics under the Equality Act 2010 might be adversely affected, and disproportionately so. The removal of green spaces in the Borough for property development could have an adverse impact on resident's mental and physical health.

Comments by section of consultation document

Foreword

The foreword is appropriately strong, we agree with the bold statement that “*Further action remains essential. The impacts of climate change continue to become more apparent.*”

We applaud the Council for:

- keeping the broad aims and objectives unchanged.
- maintaining the promise to be carbon neutral by 2030.

Preface

We are very pleased that the Council is:

- continuing to embed climate action across your services.
- still committed to leveraging all available grant funding to mitigate and adapt to climate change.
- committed to keeping the plan under review.

Although it is stated that the Council is not markedly altering the approaches adopted in the 2021 Plan, we feel there are some areas where the strength of the language has been markedly toned down, targets lowered, and actions dropped.

“*In July 2024 the Council adopted its Strategic Climate Action Plan*” needs correcting to 2021 and there is a typo in last paragraph: “*subject to*”.

1. The Need for Continued Action

The wording needs to be amended to better reflect the urgency of tackling our current climate breakdown “*concentrations of greenhouse gases in the atmosphere are rising* [insert “significantly”] and [insert “rapidly”] *making the natural greenhouse effect more pronounced*”.

“*The changing climate has significant* [insert “negative”] *repercussions that are experienced by all our communities.*”

Change wording to emphasise that climate change is already uncontrolled:

“*Uncontrolled climate change* [replace “will lead” with “is already leading”] *to higher global temperatures...*”

Change wording to emphasise that climate change is already killing people:

“*Vulnerable populations, including those with pre-existing conditions, the elderly, and underprivileged communities, are* [replace “likely to be” with “already the”] *worst affected.* [Add “People are already dying owing to climate change. Between 2030 and 2050, climate change is expected to cause approximately 250,000 additional deaths per year.⁴”

Under “*Here are some of the key impacts identified by the UK Health Security Agency:*” the two impacts below are listed at <https://ukhsa.blog.gov.uk/2023/12/11/11-things-to-know-about-the-health-effects-of-climate-change-report/> but have been omitted from the Plan. They should be included:

“**Vector-borne diseases**

“*A warming climate could expand the range and survival of disease-carrying ticks and mosquitoes in the UK. This raises the risk of diseases like Lyme disease, tick-borne encephalitis; and potentially even dengue, chikungunya, and Zika if non-native mosquito species establish themselves. Modelling suggests that London is currently suitable for the survival of these non-native species due to temperature levels.*

“*Increased biting from mosquitoes coupled with warming temperatures could also lead to outbreaks of diseases like West Nile virus in the future.*

“**Wildfires**

“*Climate projections indicate an increased risk of larger, more severe wildfires due to hotter and drier summers. If global temperatures increase by 2°C, the Met Office projects a doubling of days with a high risk of fires in the UK, with the wildfire season potentially extending into late summer and autumn.*”

Local examples of the impacts of climate change should be included:

1. The UK experienced five heatwave periods during the summer of 2022 with record-breaking temperatures of over 40°C in England. This was not an anomaly, but part of a warming trend: extreme heat events are projected to become more likely as the climate continues to change⁵. Hillingdon residents were impacted by the heat and poor air quality owing to wildfires at Philpots Farm Open Space and in neighbouring counties.
2. On 23 September 2024, there were floods in the Borough “*The frequency of such weather events is expected to increase with changing climates which is why we’ve been taking steps to try and minimise risk to households in the borough including the adoption of a flood risk management plan.*”⁶

⁴ [World Health Organisation Climate Change Fact Sheet](#)

⁵ [The London School of Economics: Turning up the heat: learning from the summer 2022 heatwaves in England to inform UK policy on extreme heat.](#)

⁶ [Council rises to challenge following flash flood crisis](#)

3. Water pollution is increasing in the Borough's rivers because the combined sewerage and rainfall systems can't cope with increased rainfall owing to climate warming⁷ (warmer air holds more water vapour, which then falls as rain).

The source of the circular diagram on page 9 must be stated. The diagram must be clearer as it raises a number of questions. Greenhouse gases, however generated, are the cause of climate change. There is no mention here of fossil fuels which are the main source of their generation, that must be mentioned. We have never seen "aerosol emissions" quoted as a driver: Our understanding is that aerosols release greenhouse gases other than CO₂ in relatively small quantities, in no way comparable with CO₂ or even methane. Again, surely land use change can release greenhouse gases (so already covered) but otherwise has impacts such as poor soils, which are not a direct result of climate change. However, that impact does not appear in the middle circle.

Under "Poor outdoor air quality" take the opportunity to state that the Council is against the use of wood burners and bonfires because they unnecessarily cause climate heating owing to inefficiencies in generating heat and disposing of waste, but also dramatically worsen outdoor air quality. Car journeys should be carefully considered and alternative healthier options such as walking or cycling used whenever possible. The council has a responsibility for providing safe and convenient options for those who would like to walk and cycle more. Every litre of petrol consumed by a car causes 2.3 kg of carbon emissions. 6000 miles a year in a highly efficient petrol car (60 mpg) would require 450 litres of petrol, and would generate a ton of CO₂ emissions. Older, less fuel-efficient cars would be considerably higher. The council has a role in encouraging take up of electric vehicles for those who still wish to drive.

⁷ [Preparing for the future – Ofwat's climate change policy statement](#)

2. Our Vision

We congratulate the Council on keeping its vision “*To become the greenest London borough*”, but there are no measures comparing how the Council is performing compared to other boroughs. The Council must reconcile its performance using [Climate Emergency UK's Council Climate Action Score Cards](#) in a comparison with other London Boroughs. We would like a League Table to be published along with the Plan Update each year, which sets out the Borough's ranking.

We also believe that Hillingdon Council needs to be crystal-clear in what it means by “the **greenest** London borough” To quote from the Council website, Friday 21 July, 2023: “*Hillingdon Council has retained its status as one of the greenest boroughs in the country after receiving 67 Green Flag Awards - the most held by any local authority.*” This is praiseworthy, but it interprets “greenest” as “having the most green flags”, or at a stretch, “the most green space” (although even there, the two are not the same). This is not the same as being the most eco-friendly, or the most energy-efficient borough, or the borough with the best route to net zero.

Correct the typo where theme C9 has been renamed “*Transparency*” when it was originally “*Transparency, Communication and Reporting*”.

Under “Our Carbon Neutral Target”, for items iii and iv, the abbreviation “i.e.” (“that is”) should be replaced by “e.g.” (“for example”), because in both cases you are giving examples.

3. Our Progress

We congratulate the Council on reducing its carbon footprint by 54% since 2020.

We feel the financial climate was only one reason the Council has not been able to deliver on all its aspirations. There have also been missed low-cost good value opportunities to work with the community and lead residents towards progress, so the wording should be changed:

"The challenging financial climate [replace "means" with "is one of the reasons"] we have not been able to deliver on all our aspirations and we have focussed on delivering tangible outcomes that we have direct control over. [insert "We have also missed low-cost good value opportunities to work with the community and lead residents towards progress]."

To accurately and transparently measure progress, all the Actions from 2021 should be listed and the progress stated for each. This should be peer-reviewed or independently verified.

Theme C1: Community Leadership

Considering in 2021 it was stated that "*Community leadership is the overarching commitment in this plan*" there has been a stark lack of progress. This is particularly disappointing when a lot could have been achieved with little financial outlay or effort, and the use of the community could have led to low-cost dramatic progress towards meeting objectives in the Plan.

"The focus has been on getting the Council's 'own house in order' which means further development of the work on community leadership is required" has no reference to the decarbonisation of private sector homes. The decarbonisation of private sector homes has so far largely been ignored; this must be rectified.

Please amend "*Work has been undertaken with the Friends of the Earth...*" to "*In 2024 the Council started meeting with Hillingdon Friends of the Earth...*".

"Work is necessary to determine whether the current cost of offsetting 1tCO2 (i.e. £95) from new development is sufficient" needs to be more specific, and more contextual information is required, including the source of the £95.

The commentary states "further development of the work on community leadership is required" but progress has been classed as **Moderate - Progress has been made against a small number of the actions**. But of the objectives set in 2021 (listed below), only C1.4 has been progressed resulting in a tangible output. So, Community Leadership should be classed as **Further development required**, to match the commentary and lack of progress. Or progress that we are not aware of should be stated.

Theme C2: The Council's Own Operations

We congratulate the Council on good work on these objectives. Residents are aware of the substantial progress against C2.5 for buildings like sports centres and the Civic Centre, and C2.7 for street lighting. However, simply stating "*The progress against this objective is very positive*" with no justification or detail relating to the objectives set below contradicts the theme of "*Transparency, Communication and Reporting*". There is no detail presented to demonstrate that 2030 targets are likely to be met. Please state what progress has been made against each objective and explain why future dates are realistic.

Theme C3: Building Better Places

Again, we congratulate the Council for positive progress. It is good that the Council implements the policies of the London Plan and is securing Section 106 funds. However, these funds need explaining

to lay people. Housing progress only mentions new development. It must be stated what has been done to improve the Council's social housing stock.

Please state what progress has been made against each objective.

Theme C4: Using Clean and Green Energy

We agree progress has been positive and are extremely pleased that work on renewable energy generation at your sites is ongoing.

However, it's disturbing that the cost of electricity from certified renewable energy sources has become cost prohibitive when it is the cheapest energy to produce. We still expect the Council to secure energy supplies from low or clean forms of generation by 2030 as prices will drop compared to more polluting generation.

Where is the Commitment to supporting local residents to set up Community Energy programmes themselves?

Theme C5: Waste Management

It's good that progress has been made but evidence should be provided about how each of the objectives have been progressed, as we have not been made aware of any progress. Any progress on reducing waste appears to be absent despite being the main theme of the commentary.

"Development is required to capture the waste management progress in the context of climate change" requires explanation.

Food waste needs a Quarterly campaign in schools in the Borough. League tables should be available for each street for food waste recycling by ward – this might increase take up (a low effort tally of number of bins collected?)

There is no mention of green waste collections being left outside to decompose in Harefield – surely a source of significant methane emissions. What is being done to measure, minimise or eliminate these?

Theme C6: Climate Change Adaptation and Mitigation

It is disappointing that the climate change adaptation and mitigation action plan is still being pushed down the road with no progress made.

"Progress against this objective is positive largely due to the work on air quality [insert "by the Mayor of London"]"

Progress on the objectives below must be listed:

- C6.4 To run a campaign to get residents involved and sharing ideas with the council to find solutions for climate mitigation and adaptation in the community.
- C6.5 To investigate opportunities to integrate environmental improvements into existing buildings for example, living walls, green roofs, habitat walls, bird, and bat boxes.
- C6.6 To run an annual campaign to raise awareness of the impacts of reducing green spaces, paving over gardens and increasing hardstanding.

Theme C7: Carbon Offsetting

The level of tree planting and ongoing green space management is adequate. We agree that more work is required to align this work with the objectives of the plan with particular focus on the biodiversity work, which needs to be progressed further. Progress or lack of needs to be stated for each of the objectives.

It needs to be stated whether the tree planting figures include HS2 net tree planting.

Theme C8: Sustainable Transportation

"Work against this theme needs to be captured in the context of this Plan so as to ensure there is alignment against the climate change objectives" needs to be explained.

The original commentary was "*The survey clearly told us that we need to do more to promote walking, cycling, public transport and electric vehicle infrastructure. Residents were keenly aware of the need for safe cycle routes and facilities to encourage a reduction in vehicle usage, which in turn would improve air quality by reducing other harmful emissions.*" yet very little has happened other than the work with TfL.

The school campaigns mentioned should be listed and the outcomes measured.

The Cycle Strategy has been written but is very weak and lacks any substantial or impactful plans.

We agree that further work on a sustainable transportation strategy needs to be programmed to ensure all the sub objectives of this theme are given attention. And that importantly the work against this theme needs to be captured in the context of this Plan to ensure there is alignment against the climate change objectives.

Again, progress for each of the original objectives needs to be evidenced.

The Council should request more digital displays at bus stops, possibly by suggesting TfL could also use them for adverts. This would lessen the need for people to get their mobiles out at night to check bus times. Important in a borough with lots of Heathrow Airport shift workers.

Theme C9: Transparency, Communication and Reporting

We agree this is an area where progress needs further development. Please state if there has been any progress on any of these other than C9.4?

4. Our Own Operational Carbon Footprint

We congratulate the Council for:

- moving to LEDs for street lighting.
- replacing 1,000 illuminated bollards with non-illuminated types.
- securing £13,751,385 through Phase 3 of the Public Sector Decarbonisation Scheme (PSDS) to fund heat decarbonisation and energy efficiency measures.

It is good to see the falls in electricity and gas use, and the graph that shows how carbon emissions reduced as gas use swapped to electricity.

Detail should be added about what the Council intends to apply for in the next phases of the PSDS and other funding.

How the baseline has been altered must explained in detail.

The following statement is made in this section:

“As renewable energy becomes more common place in the grid, the amount of carbon associated with generating a unit of electricity is reduced. If the National Grid conveyed 100% of electricity from renewable sources, our carbon footprint from our electricity supplies would be 0tCO₂”. Please explain what assumptions are being made in subsequent calculations about the energy efficiency of the grid, and the changes to that efficiency, particularly in the graphs on street lighting and fleet operations.

It is good to hear of the reduced vehicle mileage owing to improved routing, but the Plan must be changed from switching to more efficient vehicles with lower emissions to vehicles with zero tailpipe emissions. Lease prices of battery electric vehicles plus the cost of electricity are less than the annual fossil fuel bills alone. In processions, it's very embarrassing to be following the Mayor of Hillingdon's car with its autobesity and combustion engine when it could so easily be replaced with a fully electric vehicle. We do accept that the Council has not pursued low-emission vehicles at all costs as electric heavy goods vehicles (HGVs) are relatively new, scarce and consequently exceptionally expensive, however “large” needs changing to “HGV” in the document because only HGVs are dramatically more expensive.

Brunel University has ongoing significant research investment into hydrogen fuel for larger vehicles. There are within the environmental community serious doubts about the use of hydrogen, unless it is genuinely GREEN HYDROGEN (i.e. water broken down into hydrogen and oxygen by electricity, which in turn should be from renewable sources). However, we are left wondering whether any partnership working with Brunel is happening, or being considered, to take advantage of the expertise based at Brunel?

Small typo p16. “Commonplace” is one word. Typo page 20 “bollards” repeated.

5. Wider Climate Action Progress

The excellent tree planting statistics and number of Green Flag awards are very pleasing. Plans to keep trees alive should be added (in particular saplings) along with flagging the risk that more frequent wildfires may destroy the carbon sync, so this carbon offsetting should not be heavily relied upon.

Leveraging in funding from external sources to identify and prioritise areas for flood risk management is good.

The progress on levels of Waste Electrical and Electronic Equipment (WEEE) recycling is impressive, we applaud the new facilities at libraries and for Council staff. The same goes for increasing food waste recycling. WEE is a typo in your Plan. In fact, there are many typos on your page of waste examples.

“Energy from Waste facilities offer a modern treatment process that means your waste is used to generate energy in the form of both heat and power (electricity). This waste is used instead of coal, oil or gas to produce energy.” This is now the most carbon-intensive means of creating energy in the UK. For waste the carbon emitted by incineration needs to be stated and compared to that of landfill. *“Waste sent to be incinerated just north of Bristol”* – need to explain why waste is sent so far from Hillingdon and state whether it is sent by train or lorry.

Liaising with businesses about the importance of food waste collections and waste segregation is good but the Plan must state how businesses progress towards less waste and more recycling is measured. Explain what will be done to encourage retailers to provide less packaging and no single use plastics. Similarly good work with schools, but measures need to be stated.

On the page of waste examples, please change us to Hillingdon Friends of the Earth. On page 30, 13,000 is a heck of a lot of roadshows!

It is good that The London Plan sets out the planning policy for all new major development to be zero carbon and that the Council is implementing the recent planning changes to secure biodiversity net gain. The document states *“We will continue to develop how to exploit the biodiversity net gain opportunities within the borough to maximised benefits for our own natural environment”* which is an objective, so this need to be more specific, timebound and measured.

We applaud that the Council will continue to oppose runway expansion at Heathrow due to the extensive negative environmental and social impacts. The Plan must also specify how the Council will act to ensure fewer flights to and from RAF Northolt/London VIP Airport.

Instead of

“We have links to the neighbouring counties as well as central London and with less public transportation than other boroughs, the car remains a vital part of life.”

Change to

“We have links to neighbouring counties as well as central London and with less public transportation than other boroughs, the car will remain a vital part of life for many residents unless high-quality alternatives are provided.”

For *“...less public transportation than other boroughs...”*, the measure and Hillingdon’s position in the list must be specified (is Hillingdon bottom of the list?) Surely the main problem with public transportation in the borough is that it is more available for east-west journeys than for north-south journeys, particularly in the north and centre of the borough, in a borough which is about three times as “high” as it is “wide”?

It's noticeable that there is no reference to achieving better public transport. Even if the borough has limited influence over Tube and rail routes, there must be ways of achieving better bus routing, through TfL or not, and these must be specified. And for services to/from neighbouring boroughs, explain how difficult it would be to improve those.

Instead of

"This means actions to enforce a dramatic modal shift away from the car is likely to have significant negative social and economic impacts."

Change to

"A dramatic modal shift away from the car should be facilitated (not enforced) because the Council acknowledges that in other similar conurbations where car use has reduced, there have been significant positive social and economic impacts."

The defeatist and negative Cycling Strategy offers very little to feed into this Plan and misses many great value opportunities. It could have reduced car dependency and provided significant positive social and economic impacts. The School Travel and Road Safety (STaRS) Team training, Cycle Skills Sessions and Dr Bike events are great but in order to support active and safe cycling they need to be part of a much stronger Cycling Strategy that delivers many safe routes across the borough.

Page 34. "Efficient boilers", there needs to be an explanation of why all boiler replacements in housing stock appear still to be new more efficient gas boilers rather than any heat pumps at all.

6. Actions for 2025-28

The removal of all the “Commentary” sections not only takes away the context, but it makes the revised plan less “user-friendly”, we cannot see any logical reason for its removal. It should be possible to repeat each Commentary verbatim, or to explain where and why it’s changed, as part of this “update” process.

Various comments have been made in what follows about specific actions being dropped. However, it has been implied that there are some actions that need to be taken – especially with business – beyond 2028. It is not clear whether these will be new actions to be added later, or whether some of them are among the items that have just been dropped. As it stands this is confusing, because it’s not clear which items have been dropped because they will no longer be done, and which because they will be done beyond 2028.

Theme C1: Community Leadership

The community engagement section appears to have become less detailed, with fewer specific actions aimed at involving residents in the climate response.

All in all, the reduction in this Theme from 14 Actions to 6, whatever the rationalisation that has been carried out, gives a clear impression that the Council is pulling back from the Leadership aspiration that was such an integral feature of the original Plan. If this a fair conclusion, the reason why must be explained, or that impression must be changed.

The 2021 Plan focused heavily on community engagement, with a goal to empower residents, businesses, and organisations to take climate action. It included plans for a comprehensive communication strategy to educate residents on sustainable living. In the 2024 Consultation, community engagement remains a focus but with less emphasis on concrete actions to involve residents. There’s a reduction in the level of detail regarding public campaigns or workshops. There is a stronger focus on “local leadership” from councils and businesses, rather than directly empowering communities to act. Community Leadership must be dramatically strengthened in this Plan as it can be coordinated with low cost and effort but yield high-value outcomes.

Why have the following objectives from 2021 been dropped with no explanations? Reasons must be given.

- C1.1 Align our service delivery to support and promote zero carbon community outcomes.
- C1.4 Devise strategies to improve existing buildings, with access to government funding for energy efficiency and decarbonisation of residential properties and businesses.
- C1.6 We will prioritise actions for fuel poor and vulnerable households, needing assistance with accessing grant funds to improve energy efficiency and reduce their energy costs.
- C1.9 To provide a dedicated online resource that is aimed specifically at children. To complement this with an annual schools climate action competition, to support learning and development in schools, offer opportunities to see real world examples of action being taken to tackle climate change and to identify ‘young climate champions.’
- C1.11 To support, promote and raise awareness of the use of sustainable transportation and ensure resources are available to allow communities to make transport changes that do not rely on polluting private transportation

C1.13 By the end of 2021 to develop and implement an annual engagement strategy that covers all interested stakeholders (e.g. residents, resident groups and associations, community groups, environmental bodies (i.e. Sustrans, Friends of the Earth and businesses).

Theme C2: The Council's Own Operations

Why have the following objectives from 2021 been dropped with no explanations? Reasons must be provided.

C2.4 We will introduce a green staff travel plan that encourages and promotes less business travel and commuting and the increased use of low or zero carbon travel methods.

C2.5 Undertake feasibility studies and act to install small scale low and zero carbon technologies in our own building stock.

C2.6 The procurement of all our new equipment and services will be measured against the objectives of this strategic plan.

has been replaced with

"R2.5 To ensure procurement practices align with the objectives of this Plan

Action Revised for short to medium-term recognising the Council motion that 2035 is the target date for Scope 3 emissions (i.e. those embedded within the supply chain)" This is too far away in a climate emergency.

Theme C3: Building Better Places

Presumably C3.1 to 3.6 should be R3.1 to 3.6, for consistency?

Objectives need to be set to improve the Council social housing stock. Please state what progress has been made against each objective.

It's disappointing that *"C3.7 To identify and promote opportunities for the increased provision of allotments"* has been dropped as they reduce food miles.

The 2021 Plan had a commitment to retrofitting existing housing stock, incentivising the installation of renewable energy technologies like solar panels, and supporting low-carbon heating systems. In the 2024 consultation, the action items are less aggressive in terms of implementation timelines and financial commitment. There's a shift toward encouraging "energy efficiency improvements" rather than specific targets for retrofitting and renewable energy installations. The language surrounding net-zero energy standards in new buildings has softened, with less emphasis on pushing developers to adopt high energy-efficiency standards immediately. Specific and aggressive but achievable targets must be added.

The Council's own housing stock has been omitted in assessing the Council's carbon footprint since 2022. The Council's target for decarbonising its stock must appear in this plan, even though the Private landlords are now obliged to meet this minimum standard by 2030. Page 34 identifies some progress but must identify a target for reaching EPC ABC for all homes.

The list of Council assets must not omit Council Housing Stock.

Upgrades of Council housing stock are seemingly very reliant on efficient (gas) boilers. It must be explained what, if any, consideration is being given to heat pumps.

"It is becoming clear that there is a good investment case for the combination of heat pump, solar and battery (either in the car or the house) when combined with a smart meter and time of use tariff. For many, their energy bills with this kit will be half their current gas-based bills, enough to repay the capital investment in a reasonable time period." (5 March 2024 Housing Today - Chris March, chief executive and founder of Climatise). The council must specify how it will help people obtain these technologies. Particularly as the Council says *"We want to use our leadership role to assist residents in making sustainable choices on their own properties"*.

Theme C4: Using Clean and Green Energy

It's a shame that

C4.1 To ensure and certify that the council secures energy supplies from low or clean forms of generation by 2030.

has become

"R4.1 To ensure and certify that the Council secures energy supplies from low or clean forms of generation by 2030 [add] where feasible."

Even as an environmental group, we still do not fully understand why local authorities must pay more for clean energy when it is cheaper to produce. Please provide a full explanation so that our group and residents can understand.

An objective must be added to install solar photovoltaic canopies over Borough car parks. Consider council property for a decent sized brownfield solar park (Gutteridge Works?)

Theme C5: Waste Management

This section has been oversimplified, with fewer bold actions or specific reduction targets included.

In the 2021 Plan a strong commitment to reducing waste, promoting recycling, and moving towards a circular economy was in place. Emphasis on reducing single-use plastics and encouraging businesses and residents to adopt zero-waste practices. Whereas in the 2024 Consultation waste reduction is still a priority, but the 2024 consultation lacks some of the concrete actions such as specific recycling targets or waste diversion goals. It focuses more on general strategies for waste management rather than specific waste reduction initiatives (e.g. plastics generally should be added, including reducing single-use plastics).

Why have the following objectives from 2021 been dropped with no explanations? Reasons must be provided.

C5.3 Provide an online resource for educational facilities to develop and implement waste reduction strategies. Monitor, record, and report on progress.

C5.6 Develop a community campaign to manage waste more sustainability and explore the potential to lead or support reuse and repair workshops for residents.

C5.7 Promote the importance and value of growing food, either individually or through community groups.

These objectives should be included "Avoiding the production of waste in the first instance is the ideal position to be in. We want residents to become more conscious about the role waste production plays

in decision-making. We also want residents to understand how waste generation can be reduced, we want to work with businesses and major generators of waste in the borough to identify creative and innovative ways to reduce waste and raise awareness. Resources and awareness campaigns will be run to support these objectives.”

Theme C6: Climate Change Adaptation and Mitigation

It is a shame that

C6.2 To put in place a water efficiency strategy for all Council operations (such as green space watering, depot operations and corporate buildings) then monitor, record and report year on year savings.

has become

“R6.2 To review the Council’s water consumption for its own operations (such as green space watering, depot operations and corporate buildings) and put in place measures to reduce consumption” to be more feasible.

Why have the following objectives from 2021 been dropped with no explanations? Reasons must be provided.

C6.4 To run a campaign to get residents involved and sharing ideas with the council to find solutions for climate mitigation and adaptation in the community.

C6.5 To investigate opportunities to integrate environmental improvements into existing buildings for example, living walls, green roofs, habitat walls, bird, and bat boxes.

C6.6 To run an annual campaign to raise awareness of the impacts of reducing green spaces, paving over gardens and increasing hardstanding.

Theme C7: Carbon Offsetting

It should perhaps first be said that “offsetting” as a principle has had an increasingly bad press, and that it appears that most carbon offsetting schemes don’t achieve their objectives. However, the entire idea of “offsetting” something is entity A paying entity B for taking carbon reduction measures that would not otherwise be taken. But by now, the scale of the problem is such that all those measures that might not otherwise have been taken NEED TO BE TAKEN anyway. So, we don’t need just to plant trees in Hillingdon to offset carbon reductions that are otherwise too difficult, we need to plant trees in Hillingdon regardless.

Here’s what Friends of the Earth said about offsetting, as long ago as 2020:

“The reality is that we – government, businesses and individuals – need to cut our emissions by as much as we can, as fast as we can. We also need to invest in projects that will remove carbon emissions from the atmosphere. It’s not either/ or, it’s both. The same is true of nature. We need to protect what nature we have left, and we need to restore habitats, not one or the other.”

While nature and biodiversity remain important, the 2024 version lacks the same ambitious vision for expanding green spaces or increasing tree planting at the scale of the original plan.

The original Plan had strong commitments to protect and enhance green spaces, improve local biodiversity, and increase tree planting. The goal of making Hillingdon a "green borough" with a focus on natural carbon capture (e.g., tree planting). While in the 2024 Consultation biodiversity and green

space preservation remain key priorities, but the focus has shifted slightly to managing the impact of climate change on existing green spaces, rather than aggressive expansion or rewilding efforts.

The 2024 consultation doesn't mention the specific target for increasing tree planting or biodiversity restoration as clearly as the 2021 version.

Why has the following objective from 2021 been dropped with no explanation? The reason must be provided.

C7.3 To promote carbon reduction practices and carbon offsetting opportunities for businesses and communities, linked to measures to tackle climate change in Hillingdon.

Theme C8: Sustainable Transportation

We are pleased no actions have been dropped. However, the transportation section has been somewhat watered down in terms of specific actions and timelines, particularly regarding ambitious electric vehicle (EV) targets and cycling infrastructure.

In the 2021 Plan there was a strong focus on reducing transport emissions through enhanced public transport options, cycling infrastructure, and EV adoption. Ambitious targets for expanding EV charging networks, encouraging car-sharing, and reducing car dependency.

The 2024 Consultation has a continued focus on reducing transport emissions, but the actions are less specific. For example, while there is still a mention of EV infrastructure, the 2024 version lacks a clear target for the number of charging points. The number of chargers available in Hillingdon should be benchmarked annually with other London Boroughs. Competition amongst charge point providers should be encouraged with the aim of providing a diversity of options and lower costs to the consumer. Neighbouring boroughs have multiple providers, and options such as lamp post charging which is currently not an option in Hillingdon. The option for council approved cable gullies, which are being trialled in other local authorities, should be available to Hillingdon residents.

There's a noticeable reduction in the urgency of expanding cycling infrastructure. The language has become more general, with less specificity about how to reduce car dependency or promote alternatives.

Reducing overall car use should be an aim that is clearly stated, and metrics should be provided through which progress can be measured.

ALL Councillors should attend full Council meetings by public transport twice a year.

A Transport Survey should be conducted amongst the population using a full page of Hillingdon People. It should be made into a competition to encourage people to enter – e.g. a shopping voucher for a shop in the Borough. It would assess residents perception of the safety of using public transport and the reasons why they do not use public transport.

Theme C9: Transparency, Communication and Reporting

Why have the following objectives from 2021 been dropped with no explanations? Reasons must be provided.

C9.3 In July 2024, undertake a review of this strategy which will be open to public consultation and engagement.

- C9.4 To develop and undertake a sustainability appraisal of each of the action plans to ensure they are aligned to the objectives of this plan.
- C9.5 Provide a climate action plan programme detailing target dates for the development of supporting action plans.

“R9.3 To establish a People’s Assembly to consider review of the Actions necessary to meet the Corporate Climate Commitments. Revised 2026 (Oct/Nov)” This is too far away, we’ll be at 3 degrees of warming by then, so this must be brought forward.

The motion adopted by the Council in November 2021, i.e. four years ago, committed to “holding an annual ‘people’s assembly’ with residents and relevant organisations to discuss and shape revisions to the climate change action plan”. It is really unsatisfactory that this has not been done, it is not being done now to “discuss and shape” revisions proposed NOW, and it is being kicked down the road until Oct/Nov 2026, i.e. five years after the motion was passed. There may be genuine reasons for this, but it really doesn’t look good, it looks like paying lip service to residents’ opinions. This failure should be addressed head-on in the revised Plan. Regular meetings with HFoE are really welcome, but they don’t fill this void!

There should be an annual Green Transition Festival involving the Council, local groups and business to encourage change.

With reference to the omission of C9.4 and C9.5, in the original Climate Action Plan, Section 6 “The Action Plans” identifies a plethora of downstream plans, explained as follows:

“The Strategic Plan is therefore a catalyst for a series of other more detailed plans that will include actions and targets following the consultation on this document. An Action Plan tracker will collate all the actions into one place and will be available online for a transparent understanding of the ongoing actions.” This has completely disappeared from the revised Plan, which presumably explains the omission of C9.4 and C9.5. It must be explained why? Is it not happening? If not, specify what’s replaced it.

Hillingdon Friends of the Earth conclusion

Establishing a People's Assembly must be brought forward to as soon as possible this year, as it is essential, low cost and effort – and we are in a climate emergency. HFoE can look to other Boroughs for best practice and research whether third party organisations can be brought in to facilitate them if required.

We have concerns about the reduction in urgency and specificity in key areas such as building retrofitting, transport infrastructure, and biodiversity restoration. The plan must have stronger commitments, clearer action steps, and specific targets that hold both the local council and developers accountable to the climate goals.

Much more must be done to support residents in the choice to be less reliant on cars, educate about the benefits of reducing consumption and lead them into taking action that lessens global heating.

It needs to be clearer which actions have been dropped and commentary from the original plan needs to be carried forward to this plan to keep the context and justify the importance of the effort. It should be possible to repeat each Commentary verbatim, or to explain where and why it's changed, as part of this "update" process.

There are dropped or watered down objectives that need to be strengthened:

- Retrofitting of buildings and ambitious renewable energy adoption has been toned down.
- Strong language around achieving net-zero standards in new developments has softened.
- Specific, measurable actions for expanding EV infrastructure, cycling, and waste reduction have been reduced or generalised.
- The scope of biodiversity actions (e.g., tree planting, rewilding) has been narrowed.
- Weaker emphasis on Targets and Specificity:
- The urgency and specificity of some actions have been weakened, particularly in terms of timelines and measurable targets for waste reduction, EV adoption, and nature protection.

HFoE, Climate Emergency UK and the Council must work together to put pressure on the Ministry of Housing, Communities and Local Government to make taking climate action a statutory requirement on local authorities, as this would open up many funding opportunities.

There must be a summary page in the consultation where de-prioritised actions are documented for future consideration/prioritisation.

There should be an annual Green Transition Festival involving the Council, local groups and business to encourage change.

Appendix 1

Friends of the Earth Local Action Group Charter extract:

We are:

Justice-centred: we understand the climate crisis disproportionately affects those least responsible for it and is linked to other social justice and rights issues.

We understand many of us have benefitted from the mechanisms that have caused the crisis. To help right these wrongs, we must continue to learn and question our existing belief systems.

Inclusive: to build a fairer greener future for everyone, we need to make sure everyone can be involved. We work in a way that's accessible, welcoming, and respectful of all. We reach out to people from communities that are under-represented, and we actively speak out against any form of discrimination.

Brave: we won't solve the climate crisis by sticking to the status quo. We need to step out of our comfort zone to stand up for what we believe to be right. We'll be open to new ideas, challenging ourselves to think and act innovatively. We won't be afraid to fail and will learn from our mistakes.

Collaborative: we need to work together to tackle the climate crisis. In our local action groups, we enable members to take on leadership roles, we share responsibilities, and we create opportunities for people to get involved. We're generous towards other movements and recognise the experience and value of others. We're open to building bridges, uniting communities and people, supporting each other, and sharing our knowledge and skills.

Action-focused: we're committed to securing action, and not settling for empty promises. Once a commitment is made, we'll be there to make sure it's seen through. And in our own campaigning, we're committed to being active and creative to help maintain a vibrant and lively movement.

Fun: it's a big crisis we're facing, but that doesn't mean we can't have fun solving it. We'll seek out the things we enjoy doing throughout our campaigning and work together to make our community action groups safe and exciting places for people. And we'll build our resilience by looking after ourselves and each other.

HIGHWAYS IMPROVEMENT PROGRAMME 2025/26

Cabinet Member & Portfolio	Councillor Steve Tuckwell Cabinet Member for Planning, Housing & Growth
Responsible Officer	Karrie Whelan, Corporate Director Place
Report Author & Directorate	Gurmeet Matharu, Highways Asset Engineer Place
Papers with report	Appendix A - Capital release requests for approval

HEADLINES

Summary	<p>This report seeks Cabinet approval to initiate the Highways Improvement Programme for 25/26, noting the significant investment proposed together with expected Government funding and seeks release of the necessary capital funds and delegated authority to deliver the programme on time. Initial schemes are set out in the report, and all future schemes, as they are developed, will be reported for transparency as the programme progresses.</p> <p>The report also references new reporting and transparency requirements set out by the Government in March 2025.</p>
<p>Putting our Residents First</p> <p>Delivering on the Council Strategy 2022-2026</p>	<p>This report supports our ambition for residents / the Council of: An efficient, well-run, digital-enabled council working with partners to deliver services to improve the lives of all our residents</p> <p>This report supports our commitments to residents of: A Thriving Economy</p>
Financial Cost	The report seeks the release approval of £12,152k from the Highways Improvement Programme 2025/26 capital budget for carriageway and footway structural and resurfacing works at various locations in the Borough. The works will commence upon release of the funds and are due for completion by the end of March 2026.
Relevant Select Committee	Corporate Resources & Infrastructure Select Committee.
Relevant Ward(s)	All Wards

RECOMMENDATIONS

That the Cabinet:

- 1) **Agree to progress the Highways Improvement Programme for 2025/26 of forthcoming carriageway and footway resurfacing works and streetlight column replacement, noting this will be undertaken in phases with phase 1 as set out in the report and Appendix A.**
- 2) **Agree to accept grant funding from the Department for Transport of £1,152k from the Highways Maintenance Block 2025/26.**
- 3) **Approve the Budget Virement to the 2025/26 Capital Programme Budget for the Highways Structural Works programme to increase the capital expenditure from £11,000k to £12,152k, funding the increase in expenditure with an increase in the grant funding total within capital financing, to be funded by the Highways Maintenance Block allocation for 2025/26.**
- 4) **Authorise the capital release of £12,152k for all phases, to fund the proposed Highways Improvement Programme for 2025/26.**
- 5) **Delegate authority to the Corporate Director of Place to amend the programme and determine further works to be funded from the drawdown funds and Government grants, subject to sign-off by the Cabinet Member for Planning, Housing and Growth.**
- 6) **Note all schemes will also be published on the Council's website to ensure transparency as well as the other requirements to publicise details about potholes and roadworks advised by the Government in March 2025 and set out in this report.**

Reasons for recommendation

This recommendation proposes the allocation of resources to facilitate the works outlined by Highways Services, subject to approval by the Cabinet Member, with the first tranche outlined in this report and subsequent reporting for transparency on the Council's website.

Hillingdon is the second-largest borough in London, with 737 kilometres of carriageways and 1,215 kilometres of footways. The borough also contains over 30,370 streetlights and 33,000 gullies. During the previous financial year, the Council resurfaced 17.3 kilometres (10.74 miles) of carriageways and 10.25 kilometres (6.37 miles) of footways.

Hillingdon Council is committed to developing an active, sustainable, efficient, and safe transport network. A robust transport network will improve public health by reducing pollution and promoting active travel, decrease traffic congestion, and provide better sustainable transport options for short trips, such as walking, cycling, and public transport. This will also benefit the borough's economy by creating vibrant, well-connected areas that encourage local trade and visitors while reducing the negative impacts of traffic congestion.

The strategy for reclaiming and repurposing street space to create this network is a crucial foundation for enabling the Council to meet its broader objectives. This initiative presents an opportunity to renew infrastructure that serves all members of the community, including residents and businesses, while also facilitating the expansion of tree planting, the conversion of hard-standing areas to green spaces, and the promotion of active travel.

The schemes within this programme are developed following condition surveys conducted by independent consultants across the entire highway network, covering both carriageways and footways. The data gathered from these surveys, along with additional information such as complaints, defects, and traffic usage, has been used to prioritise the proposed works. The priority is to mitigate the deterioration of the borough's highway assets, thus preventing significant failures in roads, footways, verges, highway drainage, and street furniture. The aim is also to enhance the serviceability of the highway network, improving its visual appearance, rideability, and structural integrity. The established value management prioritisation criteria have been applied to select roads and pavements for resurfacing.

The proposed programme will be scheduled for implementation by the Council's term contractor. This approach will ensure that road improvement works are carried out promptly, as determined by Officers, with approval from the Cabinet Member and transparent reporting on the Council's website.

On the 23 January 2025 the Department for Transport announced the Highways Maintenance Block funding allocations, with Hillingdon confirmed to receive £1,152k, with this report recommending this grant is accepted and added to the Council's Highways Structural Works programme budget of £11,000k that was agreed by Cabinet and Council in February 2025, increasing available funding to £12,152k, with a budget virement requested to action this increase alongside an increase in grant funding within capital financing to fund the increased expenditure from the Highways Maintenance Block allocation.

In a related matter, the Government on 23 March 2025 has requested that councils publish reports on their websites by 30 June 2025, detailing their spending, the number of potholes filled, the condition of their roads, and efforts to minimise streetworks disruption. Additionally, councils must demonstrate increased spending on long-term preventative maintenance and robust plans for wetter winters. By the end of October, councils must also show how they are involving communities in decision-making about roadworks, with the public able to report potholes via an online portal.

Alternative options considered / risk management

There are no alternatives due to the level of deterioration as delaying schemes put forward for consideration by the Head of Highways may place additional pressure on the Council's financial resources should permanent repairs not be implemented in a timely manner.

In many instances, any delay of this programme may also have safety implications with a possible consequent impact on the Public Liability Insurance budget.

The Council could choose not to accept the Department for Transport grant and maintain the Capital Programme budget at £11,000k and reduce the cost of works accordingly.

Democratic compliance and/or previous authority

Cabinet may authorise the release of capital funds and initiate the programme of highways improvement works within the budget approved by the Full Council.

Select Committee comments

None at this stage. However, the Committee has undertaken an in-depth review more generally into the Council's road and pavement resurfacing programme.

SUPPORTING INFORMATION

All costs in Table 1 below have been calculated using the schedule of rates contained in the Council's Highways term contract.

The cost of this programme is to be funded from the 2025/26 capital programme for Highways Structural and Renewal Works. The programme of work is estimated to be a total of £12,152k as detailed in Appendix A and Table 1 below.

Table 1: 2025/26 Highways Structural and Renewal Works Programme Cost Plan

Item	Cost (£)
Cost of Works	11,193,810
Less: Contractor Discounts	(895,505)
Sub Total	10,298,305
Engineers' Fees	823,864
Contingency	1,029,831
Total Project Cost	12,152,000

Financial Implications

Highways Improvement Programme 2025/26 Budget £12,152k; Previously Released Nil; Capital Release Requested £12,152k – Appendix A

The 2025/26 capital programme, approved by Cabinet and Council in February 2025, included a budget of £12,152k for the Highways Improvement Programme, funded from Council resources and grants.

The report seeks the release of £12,152k from the Highways Improvement Programme budget, as detailed in Appendix A.

The release of £12,152k includes the term contractor's quoted costs, internal fees based on 8% on carriageways and footways, and project contingency at 10% on carriageways and footways of the contractor works cost for both types of works after contractor discounts. These contractual discounts consist of the Timely Release Discount (or Forward Planning Discount) of 3.75% for works being made available to the contractor prior to August. This enables the supplier to build a greater amount of certainty into their internal programming. There is also the Volume Discount of 4.25% for consolidating work requirements rather than issuing multiple small task orders, applying when a task order of greater than £500k is placed (see Appendix below for details).

The report is also including the release of £11,069,815 within the £12,152k works amount, for which schemes have not yet been finalised, for further carriageways & footways resurfacing works, and delegating authority to approve the schemes to the Corporate Director of Place in

consultation with the Cabinet Member for Planning, Housing & Growth. For transparency, the full list of schemes will be published on the Council's website when finalised.

RESIDENT BENEFIT & CONSULTATION

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

The carriageway resurfacing and footway improvement programme contains schemes to limit the deterioration of the fabric of the Borough's highways asset that can result in serious failure of roads, footways, verges, highway drainage and street furniture and improve the serviceability of the highway network for the benefit of residents and other road users.

Consultation carried out or required

N/A

CORPORATE CONSIDERATIONS

Corporate Finance

Corporate Finance has reviewed this report and concurs with the budgetary position set out above, noting that the proposed highway structural works will be funded from the approved Capital Budget for Highways Structural Works 2025/26. Works recommended for release total £12,152k, including externally contracted works costs (after contractor discounts), internal project management fees and project contingency.

Legal

Legal Services confirm that the Council, as a highway authority, is responsible for carrying out this function pursuant to section 41 of the Highways Act 1980.

Thus, there are no legal impediments to the Council authorising the capital release recommended in this report, although any contract that is entered into by the Council, such as the term contract with the Council's Highways term contractor under which the resurfacing works are to be carried out, must comply with the Council's Procurement Standing Orders, which were last updated effective 11th July 2024.

BACKGROUND PAPERS

[Government announcement 23 March 2025](#)

APPENDIX A - CAPITAL RELEASE REQUESTS FOR APPROVAL

Highways Structural Works Programme 2025/26 (Phase 1)

Location (Ward)	Project / Expenditure Title FW – Footway CW – Carriageway	Information	Funds Release Sought £	Approv e	Hold	More Informati on Required
ATTLE CLOSE (HILLINGDON WEST)	CW	FROM CEDARS DRIVE TO END	26,518			
CENTRAL AVENUE (WOOD END)	CW	FROM UXBRIDGE ROAD TO TOWNFIELD ROAD RB	251,358			
CHILTERN VIEW ROAD (UXBRIDGE)	CW	FROM COWLEY ROAD TO WHITEHALL ROAD	57,251			
ABINGDON CLOSE (HILLINGDON WEST)	FW	HILLINGDON WEST	94,453			
ACACIA AVENUE (YIEWSLEY)	FW	YIEWSLEY	277,654			
ATTLE CLOSE (HILLINGDON WEST)	FW	HILLINGDON WEST	39,911			
BLACKPOOL GARDENS (CHARVILLE)	FW	CHARVILLE	50,992			
BOLTONS LANE (HEATHROW VILLAGE)	FW	FROM BATH ROAD TO END	198,717			
DRAW DOWN	VARIOUS	HIGHWAY IMPROVEMENTS	10,196,956			
Sub-total			11,193,810			

All Locations	Carriageway & Footway Resurfacing	Timely Release Discount	(419,768)			
All Locations	Carriageway & Footway Resurfacing	Contractual Volume Discount	(475,737)			
All Locations	Carriageway & Footway Resurfacing	Engineers Fees	823,864			
All Locations	Carriageway & Footway Resurfacing	Contingencies	1,029,831			
Total seeking release			12,152,000			
Previously released			0			
Budget			12,152,000			
Remaining budget			0			

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AIR QUALITY ACTION PLAN - 2025 - 2030: PRE-CONSULTATION

Cabinet Member & Portfolio	Cllr Eddie Lavery Cabinet Member for Community and Environment
Responsible Officer	Karrie Whelan, Corporate Director of Place
Report Author & Directorate	Ian Thynne. Environmental Specialists, Planning and Sustainable Growth
Papers with report	Air Quality Action Plan – Pre consultation version

HEADLINES

Summary	<p>This report seeks the approval of Cabinet for officers to carry out a pre-consultation review of the new air quality action plan with the GLA. The intention is then to make any necessary changes and undertake a full public consultation on the action plan.</p> <p>Once adopted the action plan will be in effect from 2025 to 2030.</p> <p>The plan fulfils the council's statutory requirement to update the current air quality action plan, in accordance with guidance from the Mayor of London, and put in place actions to improve air quality.</p>
<p>Putting our Residents First</p> <p>Delivering on the Council Strategy 2022-2026</p>	<p>This report supports our ambition for residents / the Council of: Live active and healthy lives</p> <p>This report supports our commitments to residents of: Thriving, Healthy Households</p> <p>This also supports the Strategic Climate Action Plan</p>
Financial Cost	<p>Where relevant, actions will be taken forward via existing Council workstreams and existing enforcement regimes.</p> <p>Transport related air quality projects will be tailored to overlap with Local Implementation Plan projects with funding allocated by TfL and via s106 contributions secured for air quality improvements.</p> <p>Additional funding sources will be explored throughout the timescale of the Action Plan including the Mayors Air Quality Fund, Liveable Neighbourhoods Fund etc where applicable to do so</p>
Select Committee	Residents' Services Select Committee
Ward(s)	All

RECOMMENDATIONS

That Cabinet agree:

- 1) That the air quality action plan: pre-consultation version be sent to the Greater London Authority (GLA) for initial review, in accordance with requirements.
- 2) That any changes from the Council's liaison with the GLA on the plan be delegated to the Director of Planning & Sustainable Growth to make, in consultation with the Cabinet Member for the Community and Environment
- 3) Subject to the above, the publication of the final draft version, upon sign-off by the Cabinet Member for Community & Environment, for public consultation lasting a minimum of 6 weeks and furthermore, agree to receive a report back to duly consider the consultation and ultimately the plan's adoption.

Reasons for recommendations

Under Part 1V of the Environment Act 1995 the framework for local air quality management (LAQM) was introduced. Every local authority has a statutory duty to review and assess the local air quality within their boundary and, where appropriate, declare an air quality management area along with the provision of an air quality action plan (AQAP) to improve air quality. The existing air quality action plan had a 5-year framework and needs to be reviewed in accordance with the statutory requirements of the Legislation.

In 2016, supervision of the LAQM system in the Greater London Authority (GLA) area was devolved to the Mayor of London. In accordance with the London-specific policies, local authorities across London have been required to undertake a review of their current air quality action plans. This ensures future actions on air quality are taken forward using the most up to date information on predicted pollution levels and to enable the most effective measures to help improve air quality.

The council must first undertake pre-consultation engagement with the GLA prior to public consultation. This is to ensure initial compliance with the guidance and policies of the GLA. The GLA will authorise the council moving to the public consultation once content with the pre-consultation version.

Some changes may be requested by the GLA. These will be reviewed by officers, and it is then recommended that any further changes to the Action Plan are via agreement with the Cabinet Member for the Environment prior to undertaking the public consultation.

Alternative options considered / risk management

A do-nothing option would not be meet the legislative requirements. It would also potentially result in a failure to manage air quality exposing communities to risk from air pollution impacts.

It is possible that the Mayor of London could direct the council to developing an updated air quality action plan if it was considered that a) the existing approach was out of date and b) there was not sufficient evidence of tackling the threat of air pollution.

The action plan has been updated to reflect more recent data and evidence thus ensuring the optimum approach to protecting human health.

Democratic compliance / previous authority

Cabinet may authorise such strategic plans for consultation and approve them.

Select Committee comments

The previous select committee, the Residents Environmental Services Policy Overview Committee (RESPOC) undertook a full review of air quality action prior to adoption of the existing plan. This took the form of a four-month inquiry. The findings from this committee were integral to the existing plan and have been reflected and strengthened in this review. The findings remain relevant:

- 1. The action plan should maintain a strong focus on Hillingdon school travel plans. It should prioritise work with schools most affected by air pollution, particularly to explore measures to tackle idling emissions from cars and coaches;*
- 2. Further promotion of the Air Text service providing pollution alerts for borough residents should be considered;*
- 3. The council should explore ways to work with businesses to help them and their employees improve air quality in the borough;*
- 4. The air quality monitoring networks across the borough should be reviewed to ensure that there is appropriate coverage, particularly in air quality focus areas;*
- 5. The council will explore further ways to make businesses and residents aware of their responsibilities recognising that the whole Borough is designated a smoke control area;*
- 6. Existing work by the council to promote healthier and greener alternatives to driving, such as cycling and walking, and other practical ways to reduce pollution, should be integrated into the action plan along with ways to evaluate their impact in helping to reduce emissions.*

The Residents' Services Select Committee will be engaged through the annual reviews of the action plan and the associated statutory air quality monitoring.

SUPPORTING INFORMATION

1. Air pollution remains one of the biggest public health threats in the country. It is acknowledged that it results in a reduced life expectancy for thousands of people across the UK annually. A 2019 research paper from Imperial College London found that 'toxic air' contributed to the premature deaths of around 4,000 Londoners.
2. In addition, in December 2020, Coroner Phillip Barlow ruled that a 9-year-old girl from Lewisham, South London died in 2013 as a direct result of air pollution, stating air pollution made a "material contribution to her death". This was landmark case in understanding the impacts of air pollution and has driven more stringent approaches to managing air quality

3. The Government has reinforced the importance of this matter stating:

Air quality has improved in England over recent decades. However, it continues to be the biggest environmental risk to public health, with children, the elderly and the already vulnerable most affected. Poor air quality also has consequences for crop yields and, particularly in the case of ammonia and oxides of nitrogen (NOx), significant impacts for the natural environment and biodiversity.

4. Government has also recognised that local authorities are at the forefront of tackling air pollution with statutory duties imposed through the 1995 Environment Act and reinforced in the 2021 Environment Act.

Local government has an essential role to play in delivering cleaner air for communities and nature right across England. They have many of the powers and local insight to tackle issues that cause pollution locally. Local authorities (the lower tier in two-tier areas, and unitary authorities) already have a duty to address air quality exceedances in their area. This includes declaring Air Quality Management Areas and publishing Air Quality Action Plans setting out the measures they will take to come back into compliance. We also expect local authorities to take preventative action, through a local Air Quality Strategy, rather than waiting for a legal limit to be breached.

5. In addition to the national statutory requirements, in 2016, the Mayor of London implemented the London-specific local air quality management (LAQM) system for the Greater London Authority area. While the statutory framework established by national air quality regulations and Part IV of the environment act remains in place, the LAQM policy and technical guidance for London have been tailored to address the unique challenges and opportunities faced by local authorities in the city. All boroughs are now required to adhere to this updated guidance. Regarding action plans, there is a mandate to review and update them regularly, at least every five years.
6. Moreover, air pollution disproportionately impacts vulnerable communities, including those with lower incomes and individuals from Black, Asian, and Minority Ethnic backgrounds. Therefore, our efforts to improve air quality also support the council's broader goal of fostering a more equal and fairer borough for all residents.

Types of Pollutants

7. There are many types of air pollution from various sources however, it is important to understand what is relevant to the council in terms of the action plan. There are two main pollutants that the council needs to consider.

Nitrogen Oxides

8. Nitrogen oxides are a group of gases that are mainly created from burning fossil fuels. When the gas reacts with others in the air, it can create nitrogen dioxide (NO₂).

9. Short-term exposure to higher concentrations of NO₂ can cause inflammation of the airways and may increase susceptibility to respiratory infections. NO₂ can exacerbate the symptoms of those already suffering from lung or heart conditions.
10. In addition, NO₂ is a 'precursor pollutant', as it is involved in the formation of ozone. Ozone is a gas which is also damaging to human health and can trigger inflammation of the respiratory tract, eyes, nose and throat as well as asthma attacks. Moreover, ozone can have adverse effects on the environment through oxidative damage to vegetation including crops.

Particulate matter

11. Particulate matter is everything in the air that isn't gas. This includes natural sources like pollen, sea spray and desert dust. It also includes human made sources like smoke and dust from exhausts, brakes and tyres.
12. PM can travel large distances with up to 33% of PM_{2.5} (fine particles) originating from non-UK sources and around 15% from natural sources. PM is classified according to size. PM_{2.5} is less than 2.5µm (micrometers) across and is the main type of PM which is regulated. PM₁₀
13. PM can get into the lungs and blood and be transported around the body, lodging in the heart, brain and other organs.
14. There are also increasing scientific concerns related to ultrafine PM (UFPs). These particles (PM_{0.1}) are smaller in size and can be retained in the lungs longer. A recent study in relation to UFPs and aviation found concerning degrees of air pollution:
<https://www.transportenvironment.org/articles/ultrafine-particles-from-planes-put-52-million-europeans-at-risk-of-serious-health-conditions>
15. UFPs are not yet embedded into the regulatory framework but nonetheless pose a concern for the council. The action plan commits to monitoring UFPs, particularly around Heathrow Airport with the data informing future actions.

Sources of Pollution

16. Sources of NO₂ are predominantly transport based with aviation posing a particular problem. Much of these emissions are outside the control of the council, for example on the strategic road network. There is an influencing role for the council for the strategic network operators, TFL and National Highways and other major contributors such as Heathrow Airport Limited. However, at local specific hotspots, the Council does have more scope for interventions, particular around schools or where there are heavy degrees of local centre traffic.
17. Sources of PM largely come from industrial and commercial construction and operation. There is limited regulatory role for the council in managing improvements to the extent of securing clean air, but there is an influencing role meaning that collaboration with partners and industry operators is important.

Air Quality in the London Borough of Hillingdon

18. Despite improvements in air quality over the last five years in the borough, air pollution continues to impact health and economy and impact inequalities. Poor air quality is still observed at sensitive locations within Hillingdon.
19. The general trends in the three key pollutants, NO₂, PM_{2.5} and PM₁₀ are all positive and generally below the legal limit values. However, the UK limit values are an upper legal threshold, and it does not mean that air pollution is safe below these levels. The World Health Organisation recommendations for 'safe' air quality levels are much lower than the UK standards.
20. As stated previously, compliance with legal limits is not determinant of good air quality. People respond differently to various degrees of air pollution meaning impacts can be observed at levels much lower than the thresholds set by government. In addition, much of the thresholds are linked to averages. This means there could be spikes in air pollution which people are exposed to, for example during the 'school run', but modelled data over a period of time shows air pollution to be quite low.
21. The Borough, like all others in London are largely above the WHO 'safe levels' for the three key pollutants. In addition, over the course of the previous plan, more stringent air pollution levels have been adopted by the government with a particular focus on PM_{2.5} and PM₁₀. There are now statutory targets to be met in relation to these with monitoring required as a consequence.
22. This is why action to improve air quality continues as a priority for the council. There is no 'safe level' of air pollution. A reduction in air pollution and exposure to it will continue to be embedded within government and GLA air quality policy.

The 2025-2030 Air Quality Action Plan

23. The 2025-2030 air quality action plan responds to the Council Strategy aspirations for 'Thriving healthy households' and 'A green and sustainable borough'. At the heart of the plan are 6 key outcomes that build on the good work of its predecessor:
 - i. To reduce pollutant emissions within our borough to the maximum possible extent, with all emissions being mitigated
 - ii. To reduce pollution concentrations, striving to achieve the world health organization (WHO) guidelines in the shortest time possible
 - iii. Remove inequalities in exposure to poor air quality and protect the vulnerable
 - iv. Continue to use the planning system to ensure:
 - a. new development does not contribute additional air pollution and
 - b. new development in our focus areas actively contribute towards improvements in air quality
 - v. Raise awareness on the health impacts and preventive measures to be taken to safeguard health
 - vi. Influence change and lead by example
24. These overarching aims are reflected in a series of actions across 5 themes:

Monitoring and Reporting

25. The actions in this theme reflect our statutory obligations to monitor air pollution which in turn informs actions. We have over 50 monitoring points across the borough, but we recognise the need to expand this to have more sites capturing data on PM as well as ultrafines around Heathrow Airport.
26. The data collected is invaluable to identify changing priorities as well as to influence work with other statutory partners and interested parties, i.e. TFL in relation to improving public transportation or National Highways regarding pollution from strategic transport corridors.

Improving the Urban Environment

27. The actions in this theme relate to protecting and improving the places we live in. It sets the requirement to deliver specific area action plans with priority given to the most at risk areas. It also identifies Heathrow Airport as a specific area of concern and therefore requiring a bespoke council led action plan to compliment and challenge Heathrow Airport Limited's own approaches.
28. It also sets out plans for reducing exposure to harmful emissions either through increased planting or the development of better connectivity to and from the places most used.
29. Finally, the management of new development is also reflected in this theme. All new development introduces likely additional sources of pollution, whether direct or indirect. It is not possible to refuse all these developments on air pollution grounds as this is just one material planning matter. However, it is possible to secure development that is either air quality neutral (i.e. no net increase in pollution) or ideally air quality positive (i.e. a net improvement). That latter position is not straightforward and can place a high degree of constraint on development but will be pursued in our air quality focus areas.

Cleaner Transport

30. The actions in this theme relate to removing or reducing pollutants from a key source of harmful air quality. It is recognised that the borough has relatively poor transport connections, particularly north/south which means that car ownership is still relatively high. Nonetheless, more can be done within the borough to increase the alternative options to private vehicle usage. This provides healthier choices to communities without enforcing change that may have consequences in other faces of life.
31. The action plan therefore provides the framework for working with and challenging TFL to increase public transport opportunities as well as for the council to deliver more cycling and pedestrian routes as well as improving electric vehicles charging infrastructure.

Protecting the Vulnerable

32. A flagship project for this action plan is to raise awareness and education for GPs in identifying air pollution impacts for patients. This in turn will help promote the benefits of a healthier lifestyle and importantly provide information on how to achieve it in the borough.
33. This project will also ensure that schools are fully engaged on the subject of air pollution with innovative approaches to tracking air pollution and identifying cleaner routes for school children as well as making parents aware of their own contribution.

34. Area Action Plans for the focus areas will all have sections dedicated to the understanding of the impacts on vulnerable people and specific actions necessary to reduce pollutants and/or exposure to them.

Education and Awareness

35. This action focuses on using technology and toolkits to raise awareness of air pollution and provide education on improving lifestyles. There are invariably overlaps between the suite of actions with this theme largely overlapping with the others, but it is important to ensure that the action plan contains targeted action related to communication and education.

Process

36. There is a requirement to undertake a pre-consultation review with the GLA as the regulatory body overseeing action. This pre-consultation version of the plan will be sent to the GLA for comment with any changes to be made and agreed with the Cabinet Member for the environment. The air quality action plan will then be subject to a minimum 6-week consultation period.

Review

37. The Council is statutorily required to produce an Annual Status Review. This contains an update on progress against each of the actions. These are produced in September/October every year following collation of air quality data, laboratory analysis and GLA ratification.

Financial Implications

38. Where possible, actions will be integrated into existing Council workstreams, including planning development, town centre improvements, Council property upgrades, and fleet replacement. These efforts will be supported by enforcement regimes under the Clean Air Act, and Public Spaces Protection Order for no idling vehicles, and the regulation of industrial processes, alongside partnership work with businesses and health organisations.
39. For transport-related actions aimed at improving air quality, officers will collaborate on TFL allocated funded projects to maximise the overlaps between improving transport and reducing air pollution.
40. Additional funds for air quality improvements have been secured and ring-fenced from S106 agreements from planning approvals, subject to Council approval procedures.
41. Currently the Council holds £3,800k unallocated air quality S106 contributions that can be used towards the future air quality action plan delivery.
42. Throughout the plan's timescale, further funding opportunities will be pursued, such as the mayor's air quality fund, liveable neighbourhood's bids, and other applicable sources.

RESIDENT BENEFIT & CONSULTATION

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

43. Air pollution is known to have a significant detrimental impact on communities. The action plan is driven by data to prioritise action to reduce pollution and the exposure to it.
44. The benefits of the plan are therefore health led. However, by working in partnership with others, additional benefits can be realised. For example, urban planting can have many wider benefits related to wildlife, climate change and improving the amenity in an area.

Consultation & Engagement carried out (or required)

The plan has been developed with collaboration of internal officers. The next stage is to secure a pre-consultation review by the GLA as the regulator as required by policy.

Once this step has been completed; the plan and any changes will be subject to further internal review by officers in collaboration with the Cabinet Member for the Community and Environment.

The Air quality action plan will be finalised and published for a minimum of 6 weeks consultation.

CORPORATE CONSIDERATIONS

Corporate Finance

Corporate Finance have reviewed this report and concurs with the financial implications set out above, noting the recommendation to approve the Air Quality Action Plan 2025-2030: Pre-consultation version.

Furthermore, it is noted the delivery of the air quality action plan will be funded from air quality S106 contributions, which currently amount to £3,800k as of month 10. To enable the delivery of the plan up to 2030, officers will pursue further funding opportunities through external funding from Transport for London and additional S106 agreements, to ensure there will be no pressure on General Fund resources, which will be monitored as part of the regular monthly monitoring process.

Legal

Section 82 of the Environment Act 1995 (“the Act”) places a duty on the Council to review the quality of air in its area, to assess whether the air quality standards and objectives set out in The Air Quality (England) Regulations 2000 (as amended) are being achieved or are likely to be achieved.

Section 83 of the act requires the Council to designate air quality management areas (AQMA) where, as a result of an air quality review, it appears that air quality standards or objectives are not being achieved or are unlikely to be achieved within a relevant period.

Section 83A of the Act requires the Council to prepare an air quality action plan (AQAP) detailing the remedial measures that will be delivered to work towards meeting the air quality objectives for the designated area(s).

Since the Council's existing AQAP had a 5-year framework and it now needs to be reviewed and pursuant to section 83A (6), of the act, the Council may revise its AQAP any time.

Part IV of the Environment Act 1995 Local Air Quality Management Policy Guidance (PG09) requires the Council to undertake statutory consultation when revising its AQAP and the London Local Air Quality Management Policy Guidance requires the Council to submit its draft AQAP to the GLA both prior to and post public consultation.

Planning comments

Section 106 has been a fundamental factor in delivering actions within the previous plan. The plan sets out the processes and context by which Section 106 funding is secured from new development to implement the actions in the plan. All Section 106 spend is subject to a separate allocation process.

BACKGROUND PAPERS

NIL

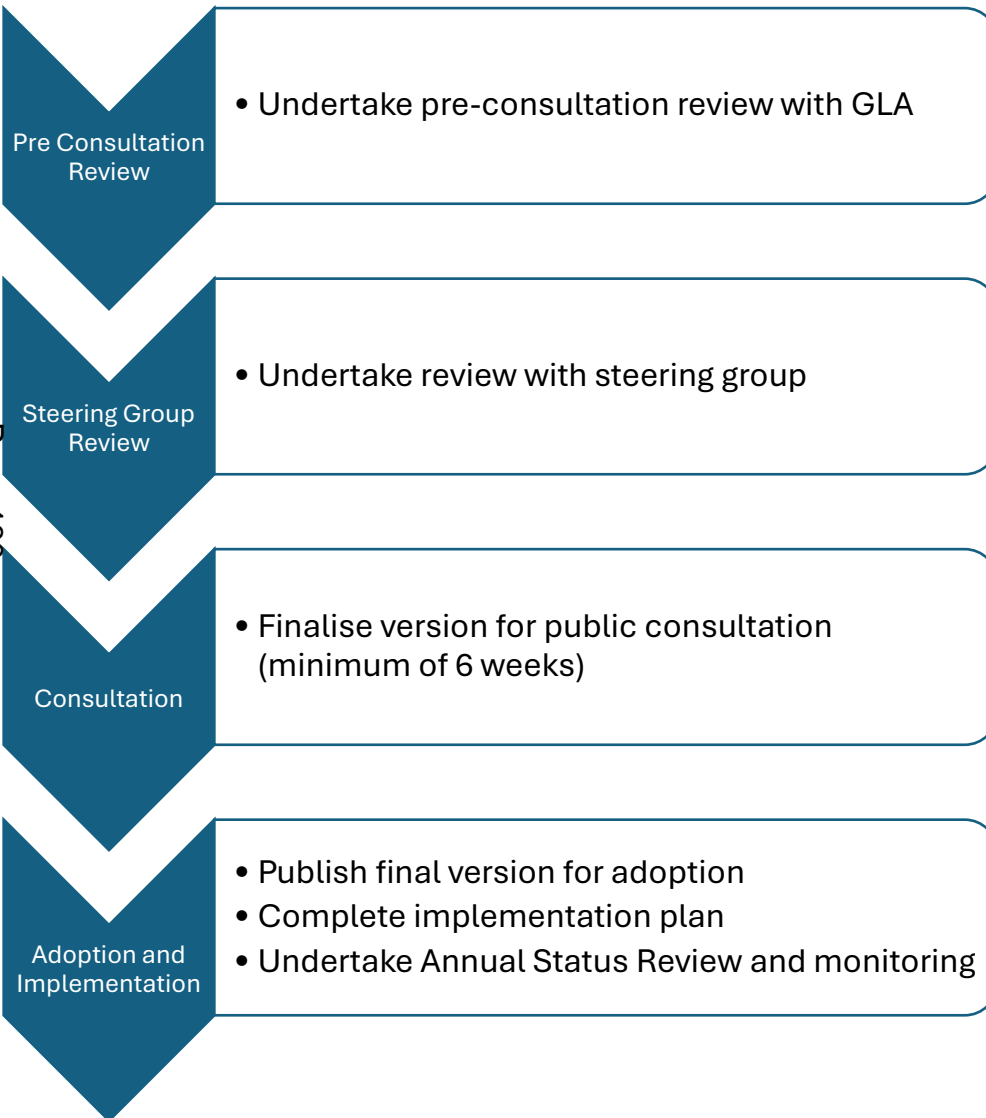


London Borough of Hillingdon Air Quality Action Plan

2025 - 2030

Pre Consultation Draft

Process



Our Vision for Clean Air

Everybody is entitled to breathe clean air. There are no safe levels of air pollution; long term exposure to even low levels of air pollution can impact our health. Therefore, improving air quality is a priority. Our vision is to strive to offer clean air to everyone who live, work, study or visit the Borough. The core aims we have set to help us to achieve this vision are:

- 1) To reduce pollutant emissions within our Borough to the maximum possible extent, with all emissions being mitigated
- 2) To reduce pollution concentrations, striving to achieve the World Health organization (WHO) guidelines in the shortest time possible
- 3) Remove inequalities in exposure to poor air quality and protect the vulnerable
- 4) Continue to use the planning system to ensure:
 - a. new development does not contribute additional air pollution and
 - b. new development in our Focus Areas contribute improvements in air quality
- 5) Raise awareness on the health impacts and preventive measures to be taken to safeguard health
- 6) Influence change and lead by example

Progress

This AQAP has been produced as part of our duty to London Local Air Quality Management and replaces the previous action plan which ran from 2019 to 2024. Highlights of successful projects delivered through the past action plan include



Limiting impact of new development using planning policies

- Air Quality Neutral applied to all developments as minimum.
- Air Quality Positive applied for major developments and for all development within catchment areas of Air Quality Focus Areas
- Applied a zero emissions approach towards developments when located in or affecting sensitive areas such as Air Quality Focus Areas, near vulnerable receptors such as schools, care homes, hospitals, and densely populated residential areas.
- Required total emission mitigation within catchment areas of Focus Areas. Pollution damage costs were used consistently as the basis for s106 contributions where mitigation offered was considered not sufficient and or appropriate.
- ensured adequate, appropriate, and well-located green space and infrastructure in new developments.

- ensured emissions from construction were minimized with enforcement of Non-Road Mobile Machinery (NRMM) air quality policies. 85 construction site audits undertaken.
- Level of mitigation ascertained for total emissions from diesel emergency backup generators attached to development such as data centres using Defra's damage costs approach to gain a S106 obligation when mitigation provided by the developer was insufficient to mitigate total emissions.
- Promoted energy efficiency retrofitting projects in workplaces and homes. A total of 1207 boilers were replaced.



Promoting air pollution forecasting and route planner tools

- 209 active subscribers to airTEXT.
- All schools now have Walking Maps at school entrances and new footpaths are put in place where possible to encourage active travel.



Tackling unnecessary idling by taxis, coaches and other vehicles

- introduced a Targeted Problem-Solving Group working with partners including the Police, Fire Brigade, TfL, Housing associations and a range of Council departments. There is a rolling programme of events at community hubs utilising supermarkets and community halls to engage with residents and local businesses
- Information on air quality such as no idling and Airtext has been included in the programme for dissemination at these events.
- 1985 drivers engaged as part of idling events and ongoing no-idling enforcement.
- All schools were alerted to the No-Idling webinars.



Installation of on-street electric vehicle (EV) charge points throughout Hillingdon

- The Council has an EV strategy in place with short-, medium- and long-term recommendations to increase EV awareness throughout the borough and increase the provision of infrastructure.
- 350 electric vehicle charge points installed between 2019 and 2024.
- Commitments made to increase the infrastructure further



Targeted implementation of green infrastructure

- A total of 35,200 trees were planted across Hillingdon between 2019 and 2024
- The protection of public exposure at public recreational spaces was implemented through appropriate greening.
- Eleven amenity areas and children’s playgrounds in close proximity to busy roads have been approved for additional green infrastructure.



Working with schools to raise awareness and reduce air pollution

- The first school street in Hillingdon is now up and running, with a further five schools currently under implementation
- Up to 2024, there were 21 Gold, 5 Silver and 9 Bronze accredited schools in the borough with an increasing number interested specifically in air quality issues
- The Green Barriers at Schools Project improved the school environment at 49 schools.
- 40 schools have been funded for air quality awareness education workshops.
- A school superzone fund has been received for Minet school with the key objective of improving air quality.



Provision of infrastructure to support walking and cycling

- Development of the Grand Union Canal Quietways link between Hayes and Cranford Park. This will give residents in Hayes a pedestrian/cycle route choice to access Cranford Park.
- Cycle lanes on Park Road, Uxbridge and High Street, Ickenham / Long Lane down to Hillingdon Station completed.
- Consolidated the disjointed cycle provision on the A4020 Uxbridge Road
- Cycling parking provision at Deansfield Primary School and Holy Trinity Primary School.
- Upgrade to footpaths in key locations.



Our Focus Areas

- Studies developed to improve air quality in the Hillingdon Air Quality Focus Areas to identify short, medium, long-term solutions for measures to implement to improve air quality. All development affecting Focus Areas have been required to meet zero emissions.

1. Introduction

As a council we are committed to improving air quality for our communities. This Air Quality Action Plan (AQAP) has been produced to deliver this commitment in full alignment with our statutory duties.

This document sets the actions that the London Borough of Hillingdon (LBH) will take between 2025 and 2030 to improve air quality by reducing pollutant emissions and exposure of our populations to pollution.

The selected actions consider our specific local issues and work already underway which is producing fruitful results and are expected to positively impact on the health and quality of life of our residents and those employed in, studying, or visiting the Borough.

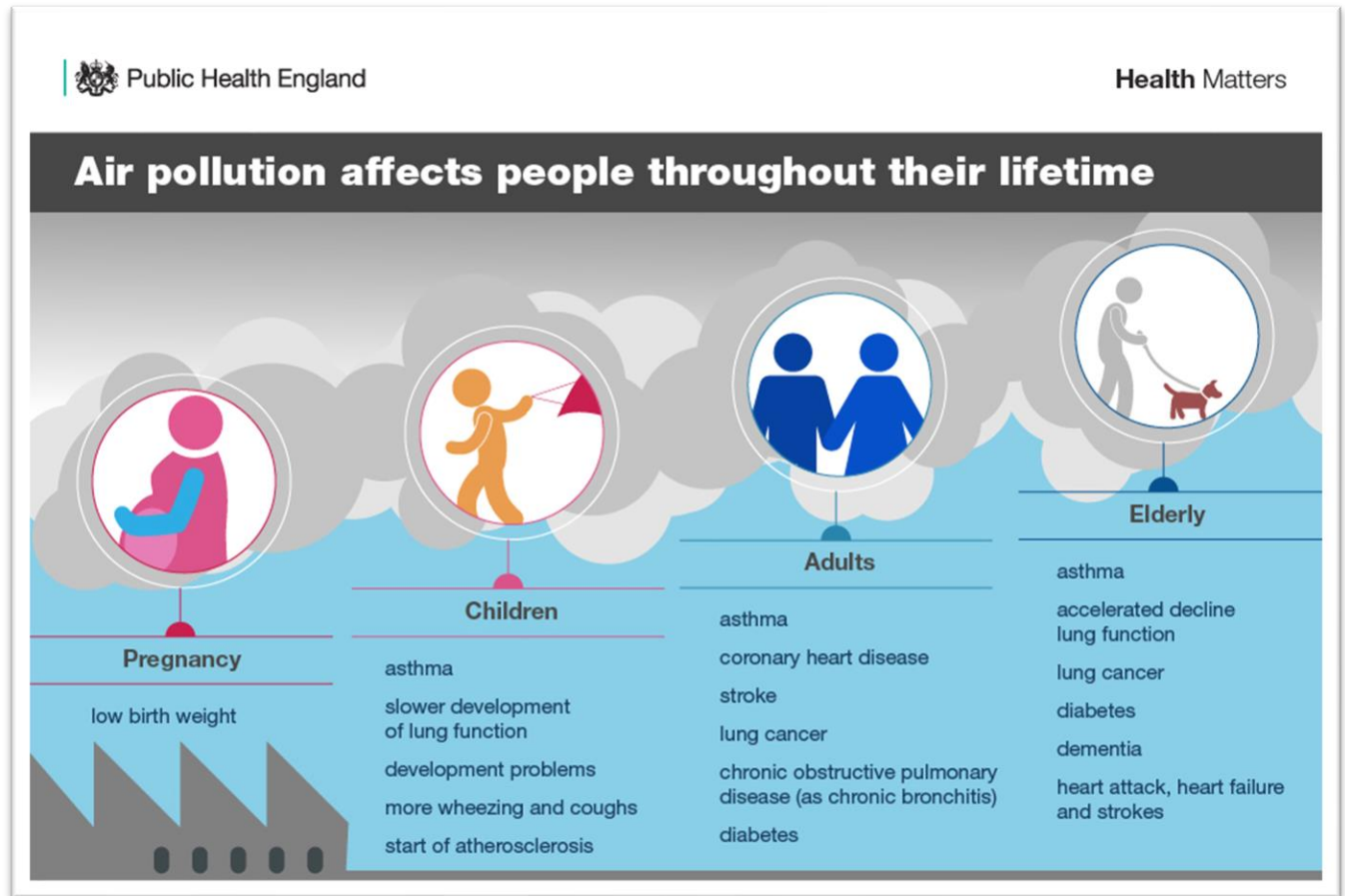
This Air Quality Action Plan (AQAP) is a statutory document and has been produced as part of our duty to London Local Air Quality Management (LLAQM). It has been developed in recognition of the legal requirement on the local authority to work towards air quality objectives under Part IV of the Environment Act 1995 and the suite of regulations made under the Environment Act 2021

The need for an Action Plan

Air pollution is defined by any chemical or composition alteration of pure air. Air pollution consists of chemicals or particles in the air that can harm the health of humans as well as impact the balance of our ecosystems and the conditions of our urban environment.

The main pollutants of concern within the London Borough of Hillingdon are nitrogen

dioxide (NO₂) and particulate matter (PM). There is currently no safe level for PM_{2.5} or NO₂. In recognition of this, the World Health Organisation (WHO) recently lowered its guideline limits for PM_{2.5} to 5 µg/m³ and NO₂ to 10 µg/m³. Since we do not yet have evidence of what a safe level of exposure to NO₂ and PM is, we must continue to reduce concentrations as much as possible to protect our communities.



Both short and long-term exposure to air pollution can lead to a wide range of harmful effects which come about at every stage of life, from a foetus' first weeks in the womb all the way through to old age.

However, some groups are more vulnerable, and these include, children, the elderly, and people with pre-existing health conditions.

Air pollution is the largest environmental threat to public health in the UK. Exposure to air pollution is estimated to cause 36,000 premature deaths each year.

Pollution is also disproportionately impacting in areas with higher degrees of deprivation.

It is therefore important that we prioritise

action to reduce air pollution and minimise exposure. We aim to achieve the lowest pollution concentrations possible in the shortest period.

Types of Air Pollution

There are many substances that can impact air quality. The Government has committed to reducing emissions from the 5 most prevalent and damaging pollutants.

Scale of the problem

It is estimated that **long-term exposure to man-made air pollution in the UK** has an annual effect equivalent to:

28,000 to 36,000 deaths



Over the following 18 years a **1 µg/m³ reduction in fine particulate air pollution in England** could prevent around:



50,900 cases of coronary heart disease

16,500 strokes



9,300 cases of asthma

4,200 lung cancers

Particulate matter

(PM or PM_{2.5} or ultrafines)

Particulate matter is everything in the air that isn't gas. This includes natural sources like pollen, sea spray and desert dust. It also includes human made sources like smoke and dust from exhausts, brakes and tyres.

PM can travel large distances with up to 33% of PM_{2.5} originating from non-UK sources and around 15% from natural sources. PM is classified according to size. PM_{2.5} is less than 2.5µm (micrometers) across, and is the main type of PM which is regulated.

PM can get into the lungs and blood and be transported around the body, lodging in the heart, brain and other organs.

PM emissions have reduced significantly in recent decades, but have recently stabilised. This is partly due to an increase in wood burning in homes.

Sources of PM

- 38% from burning wood and coal in domestic open fires and solid fuel stoves
- 12% from road transport
- 13% from solvent use and industrial processes
- 16% from industrial combustion (non-domestic burning)

Nitrogen oxide (NOx)

Nitrogen oxides are a group of gases that are mainly created from burning fossil fuels. When the gas reacts with others in the air, it can create nitrogen dioxide (NO₂). It also creates ozone (O₃).

The UK isn't meeting the current limits of nitrogen dioxide concentration. We have published an air quality plan for nitrogen dioxide, setting out how we plan to meet these limits in the shortest possible time.

Sources of nitrogen oxide

- 35% from road transport
- 22% from energy generation

- 19% from industrial combustion
- 17% from other transport, such as rail and shipping

Ammonia (NH₃)

Ammonia is a gas that is released into the atmosphere, mostly from agricultural sources like slurry or other rotting farm waste and fertiliser.

We must reduce emissions of ammonia (from the 2005 baseline) by 8% by 2020 and by 16% by 2030.

Sources of ammonia

- 88% from farming practices such as storing and spreading manures, slurries, and spreading of inorganic fertilisers
- 4% from the waste sector
- 8% from a wide range of sources such as vehicles, human waste and industry

Sulphur dioxide (SO₂)

Sulphur dioxide is an acidic gas which can combine with water vapour in the atmosphere to produce acid rain. Sulphur dioxide is an irritant that can affect airways, particularly in those who have asthma.

We currently meet the legal limits for daily and hourly levels of sulphur dioxide in

ambient air. We aim to reduce emissions of sulphur dioxide (from 2005 baseline) by 59% by 2020 and 88% by 2030.

Sources of sulphur dioxide

- 37% from energy generation
- 22% from industrial combustion
- 22% from domestic burning

Non-methane volatile organic compounds (NMVOCs)

Non-methane volatile organic compounds (NMVOCs) are organic molecules, which differ widely in their chemical composition but can display similar behaviour in the atmosphere. These include vapours from every day products we use at work or home like petrol, solvents, air fresheners, cleaning products and perfumes.

We must reduce emissions of NMVOCs (from 2005 baseline) by 32% by 2020 and 39% by 2030.

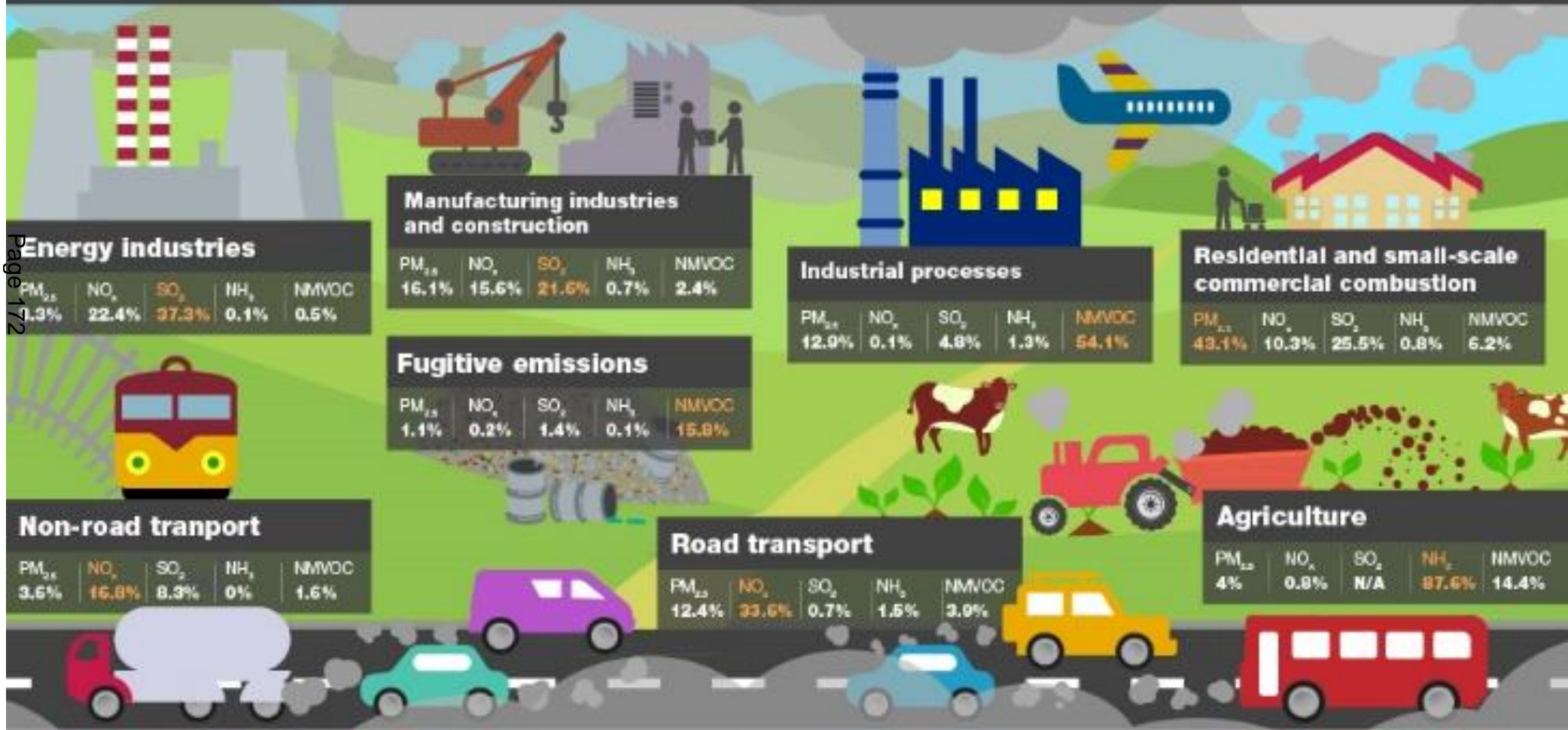
Sources of NMVOCs

- 54% from industrial emissions
- 14% from agriculture
- 8% from domestic and industrial combustion
- 5% from transport



Sources of air pollution

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Pollution substances:

SO₂ - Sulphur dioxide
 NO_x - Nitrogen oxides

NH₃ - Ammonia
 PM_{2.5} - Primary particulate matter

NMVOOCs - Non-methane volatile organic compounds

The Costs of Air Pollution

Not only does air pollution harm our health, it also harms our economy. It is estimated that the health problems resulting from air pollution cost the UK up to £20 billion per year.

It also significantly impacts the NHS. In 2017 it was estimated that in England the cost to the NHS and social care systems from air pollution was £157 million.

Helpfully, the cost of air pollution can be relatively easily monetised and this is reflected in our work on new development.

We can calculate the costs to society of annual pollutant emissions using Defra's damage cost approach over the lifecycle of development.

We have pioneered this approach since 2019 when considering new development and secured income that allows us to deliver air quality actions for our communities.

The Policy Context

This AQAP is placed within a framework of international, national, regional, and local policies and guidelines. This section outlines the context that the AQAP was developed within.

International context

In July 2022, the United Nations (UN) General Assembly declared access to a clean and healthy environment a human right – this includes clean air. Although this is not legally binding, it formalises the right to breathe clean air and is an important step towards protecting human health as well as the health of the planet.

The WHO estimates that air pollution (indoor and outdoor combined) is associated with 7 million premature deaths annually. The WHO assesses the health effects of air pollution and provides guidelines for pollution levels in the atmosphere to prevent risk to human health.

The most recent update to the WHO guidelines was September 2021. Although these thresholds are not legally binding they provide information on the levels of pollution in the air which are considered to be harmful to human health, underpinned by robust research and a wide body of scientific evidence.

UK Research and Innovation

Clean air underpins everything we need and value:

- *our physical health*
- *our mental wellbeing*
- *our quality of life*

the environment we depend on.

Poor air quality, then, presents serious risks.

*In the UK it is the fourth biggest danger to public health, contributing to over 40,000 deaths and carrying an estimated annual cost of **£20 billion** to health services and businesses.*

www.ukri.org

National context

The UK has a long history of air pollution policy, with the *Clean Air Act 1956* being introduced in response to the 1952 smog in London, extended in 1968 and then consolidated in 1993. *The Environment Act 1995* as amended by the *Environment Act 2021* requires the Government to produce an Air Quality Strategy. The *Clean Air Strategy 2019* sets out actions required across government and society to tackle air pollution in England.

The clean air chapter of the *Environmental Improvement Plan 2023* builds on and updates the 2019 Clean Air Strategy.

Additionally, the *2023 Air Quality Strategy: Framework for Local Authority Delivery* sets out the actions that Defra expects local authorities to take in support of the air quality targets.

Pollution levels are regulated by the *Air Quality Standards Regulations 2010*, meaning that there are legally binding limits for concentrations in outdoor air for major air pollutants that impact human health, including NO₂, PM₁₀, and PM_{2.5}. These limits are far less stringent than the WHO 2021 guideline thresholds.

Most recently, the *Environment Act 2021* included amendments to the *Clean Air Act*

1993 as well as extending the *Environment Act 1995*. This requires the Government to set two new air quality targets. The air quality targets set in the *Environmental Targets (Fine Particulate Matter) (England) Regulations 2023* are:

- Annual Mean Concentration Target ('concentration target') - a maximum concentration of 10µg/m³ to be met across England by 2040
- Population Exposure Reduction Target ('exposure target') - a 35% reduction in population exposure by 2040 (compared to a base year of 2018).

Additionally, interim targets have been set stating that by January 2028:

- An annual average of 12µg/m³ for PM_{2.5} is not exceeded at any monitoring station.
- Population exposure to PM_{2.5} is at least 22% less than in 2018.

These are still above the WHO suggested thresholds reinforcing the context of 'no safe level of air pollution'.

More recently, the *Clean Air (Human Rights) Bill* aims to express the human right to clean air in UK law. The proposed legislation, *Ella's Law*, aims to establish the right to breathe clean air and to require the Secretary of State to achieve and maintain clean air in England.

Ella's Law

Ella Roberta Adoo Kissi Debrah died on 15 February 2013 at the age of nine as a result of asthma contributed to by exposure to excessive air pollution in London. She was a bright, talented girl who loved sports, music and reading.

Ella was the first person in England to have air pollution named as a cause of death by a coroner. In his report, the coroner urged the government to take action to bring air quality up to minimum World Health Organization (WHO) standards.

Ella's Law is what people are calling the *Clean Air (Human Rights) Bill*, introduced to Parliament by Baroness Jenny Jones in May 2022. It would force the government to act to bring air quality in every community up to minimum WHO standards.

Regional context

Air Quality (England) (Amendment) Regulations 2002 and the Environmental Targets (Fine Particulate Matter) (England) Regulations 2023, provide the statutory basis for the national air quality objectives.

These have been taken forward at the London level by the Mayor in the London Local Air Quality Management (LLAQM). The LLAQM system is a statutory process by which London local authorities monitor, assess and take action to improve local air quality.

The Environment Act 1995 (Part IV) requires local authorities in the UK to review air quality in their area and designate Air Quality Management Areas (AQMA) if improvements are necessary. Where an AQMA is designated, local authorities are also required to produce an air quality action plan describing what they will do to contribute to achieving air quality limit values in the local area.

To assist this and further support air quality improvement across London, the London Plan sets out a framework for how London will develop over the next 20-25 years and the Mayor's vision for Good Growth taking into account air quality through policy SI1.

The London Environment Strategy 2018 sets

out how the Mayor of London is tackling air pollution across London, including its aim to meet WHO health-based guidelines for PM_{2.5} by 2030.

Local context

There are several council policies which link to air quality and that this AQAP aligns with. These include:

- London Borough of Hillingdon Cycling Strategy and Electric Vehicle Charging Strategy
- London Borough of Hillingdon Strategic Climate Action Plan
- Joint Health and Wellbeing Strategy 2022-2025: This strategy includes a theme of "Healthy Places" which incorporates the requirement to create a borough where residents have access to clean air.
- Council strategy 2022-2026 – This strategy outlines the council's vision of putting residents first, and its ambition statement for residents that Hillingdon is a safe, inclusive, more digital borough with a strong economy.
- London Borough of Hillingdon Local Plan - The Local Plan is a collection of planning

documents that, alongside national planning policy and the Mayor's London Plan, sets out our strategy for future development in Hillingdon. It includes policies around housing, town centres, open space employment, community facilities, the built and natural environment and transport. This includes a specific policy on air pollution.

Council Strategy

Our ambition for residents

Hillingdon is a safe, inclusive, green, more digital borough with a strong economy.

- We want all our residents to:
- Live active and healthy lives
- Enjoy access to green spaces, leisure activities, culture and arts
- Live in a sustainable borough that is carbon neutral
- Be/feel safe from harm
- Live in good quality, affordable homes in connected communities
- Stay living independently for as long as they are able
- Achieve well in education, with opportunities for learning at all ages
- Have opportunities to earn an income that supports their families

2. Air quality in London Borough of Hillingdon

Background

Despite improvements in air quality over the last five years, air pollution continues to impact health and economy and impact inequalities. Poor air quality is still observed at sensitive locations within Hillingdon despite broad compliance of the legal thresholds.

The London Borough of Hillingdon is required by law to monitor certain air pollutants through a framework called London Local Air Quality Management (LLAQM). Monitoring Air Pollution in the borough

Air quality monitoring is undertaken across the borough to understand how pollution levels are changing over time and to compare these with the thresholds set for protecting human health.

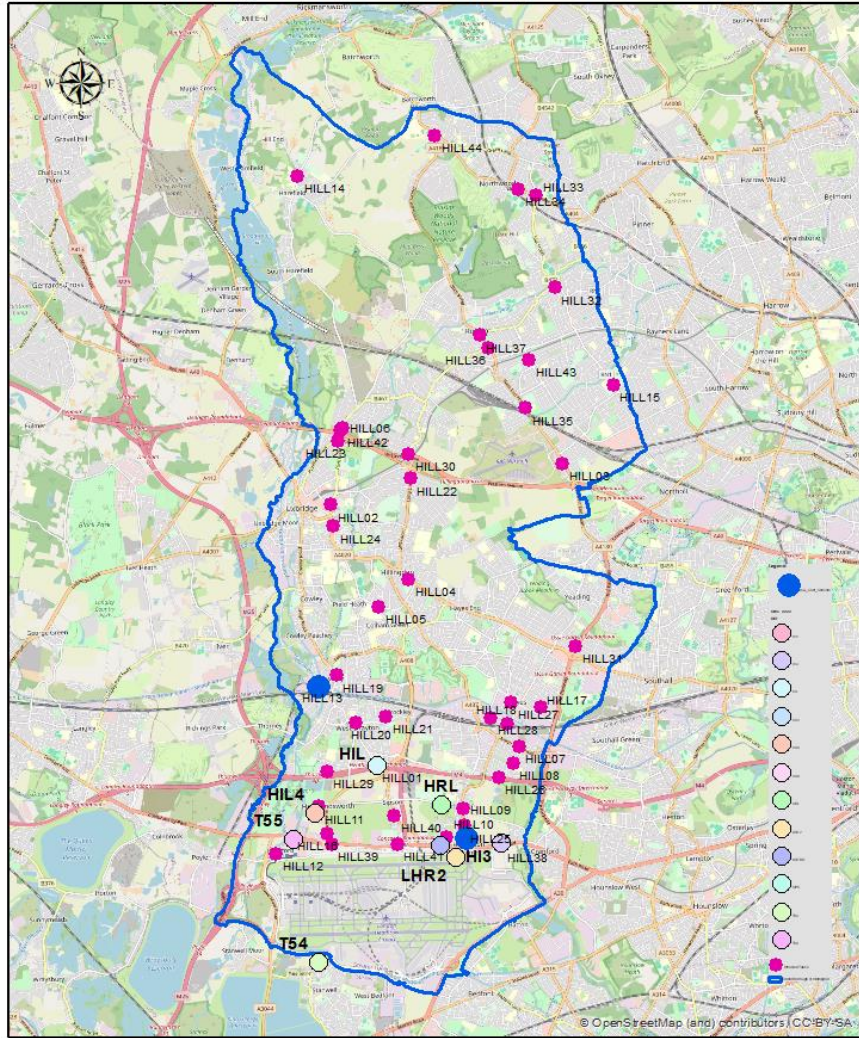
A review of the monitoring data collected between 2019 and 2023 shows a general decreasing trend in NO₂, PM₁₀ and PM_{2.5} concentrations across Hillingdon.



In that time though, limit values set through UK legislation have been made more stringent. Air quality is improving but pollution levels are still generally higher than those promoted through the WHO guidelines. Whilst these guidelines

are not statutory, they do indicate that air quality improvements should remain a priority.

Pollutant	UK Air Quality Standards	World Health Organisation
NO ₂	40 µg/m ³ annual mean 200 µg/m ³ 1-hour mean	10 µg/m ³ annual mean 15 µg/m ³ 1-hour mean ³⁷
PM _{2.5}	20 µg/m ³ annual mean	5 µg/m ³ annual mean 15 µg/m ³ 24-hour mean
PM ₁₀	40 µg/m ³ annual mean 50 µg/m ³ 24-hour mean	15 µg/m ³ annual mean 45 µg/m ³ 24-hour mean

Hillingdon Monitoring Sites 2024





 5 1 2 3 4 Coordinate System: British National Grid
 Kilometers Central Meridian: 2°0'0"W

How does Hillingdon monitor air pollution?

We currently operate 12 automatic monitoring stations and a diffusion tube network comprising 44 monitoring locations as shown on the map to the left.

11 of the automatic stations monitor NO₂ and PM₁₀, 7 also measure PM_{2.5}. The 44 diffusion tube locations monitor NO₂ only. In addition, the borough also operates two low-cost sensors from the Breathe London project, monitoring NO₂ and PM_{2.5}. Monitoring data collected each year are published in Annual Status Reports (ASR) and made available on the Hillingdon council website.



Diffusion Tube example



Automatic Monitoring Station

Trends in pollution levels across Hillingdon

NO₂

Air quality in the borough has generally improved over the last air quality action plan timeframe, as demonstrated by the monitoring data.

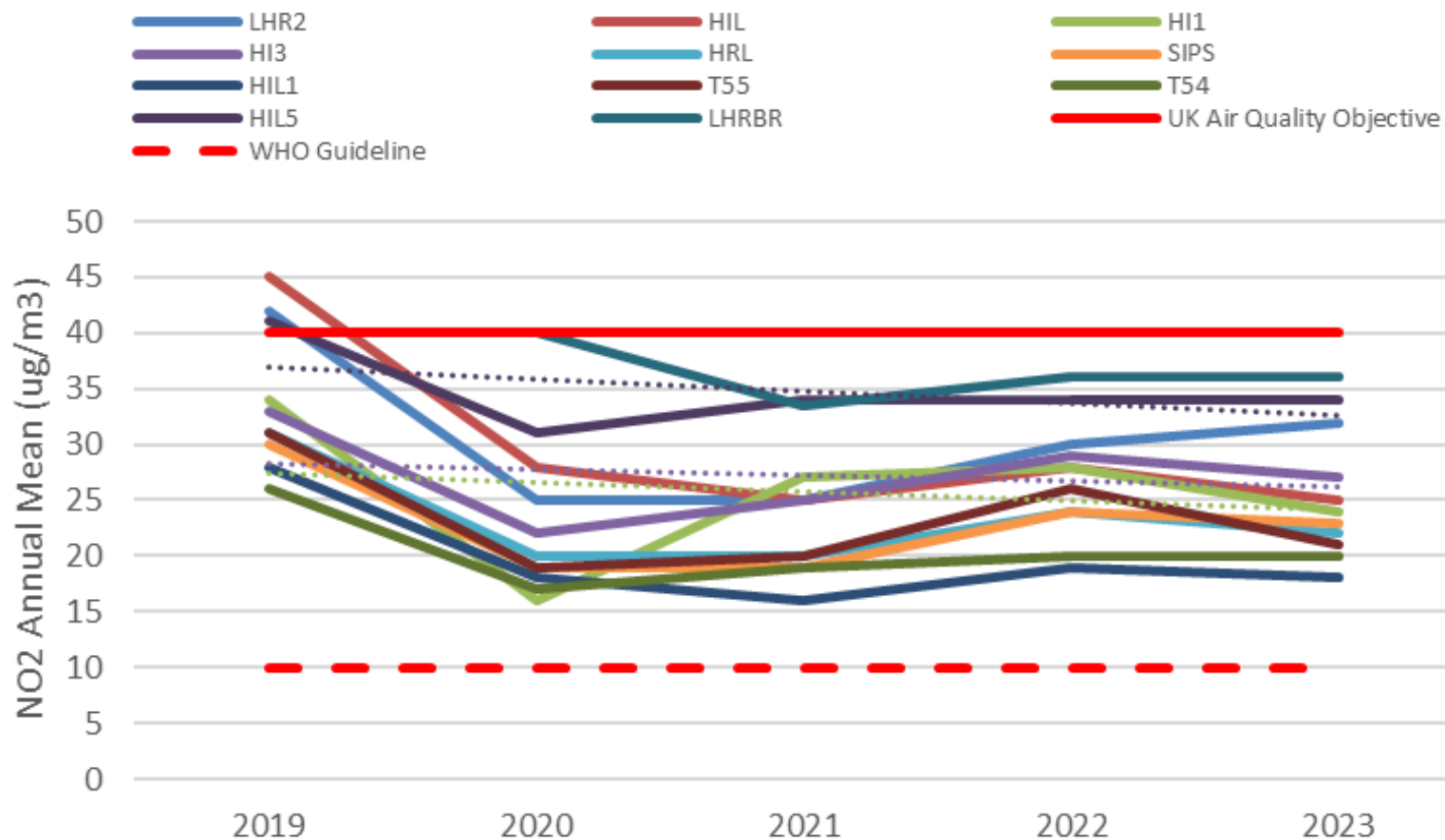
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The annual mean NO₂ concentrations recorded from the eleven automatic sites monitoring this pollutant within the borough can be seen in this figure.

Years 2020 and 2021 are considered Covid years and record significant downturn in activity, particularly linked to pollutants from transportation.

Importantly, as the Covid recovery commenced, levels of NO₂ has not returned to pre-Covid levels.

NO₂ Annual Mean Concentrations



Trends in pollution levels across Hillingdon

PM₁₀

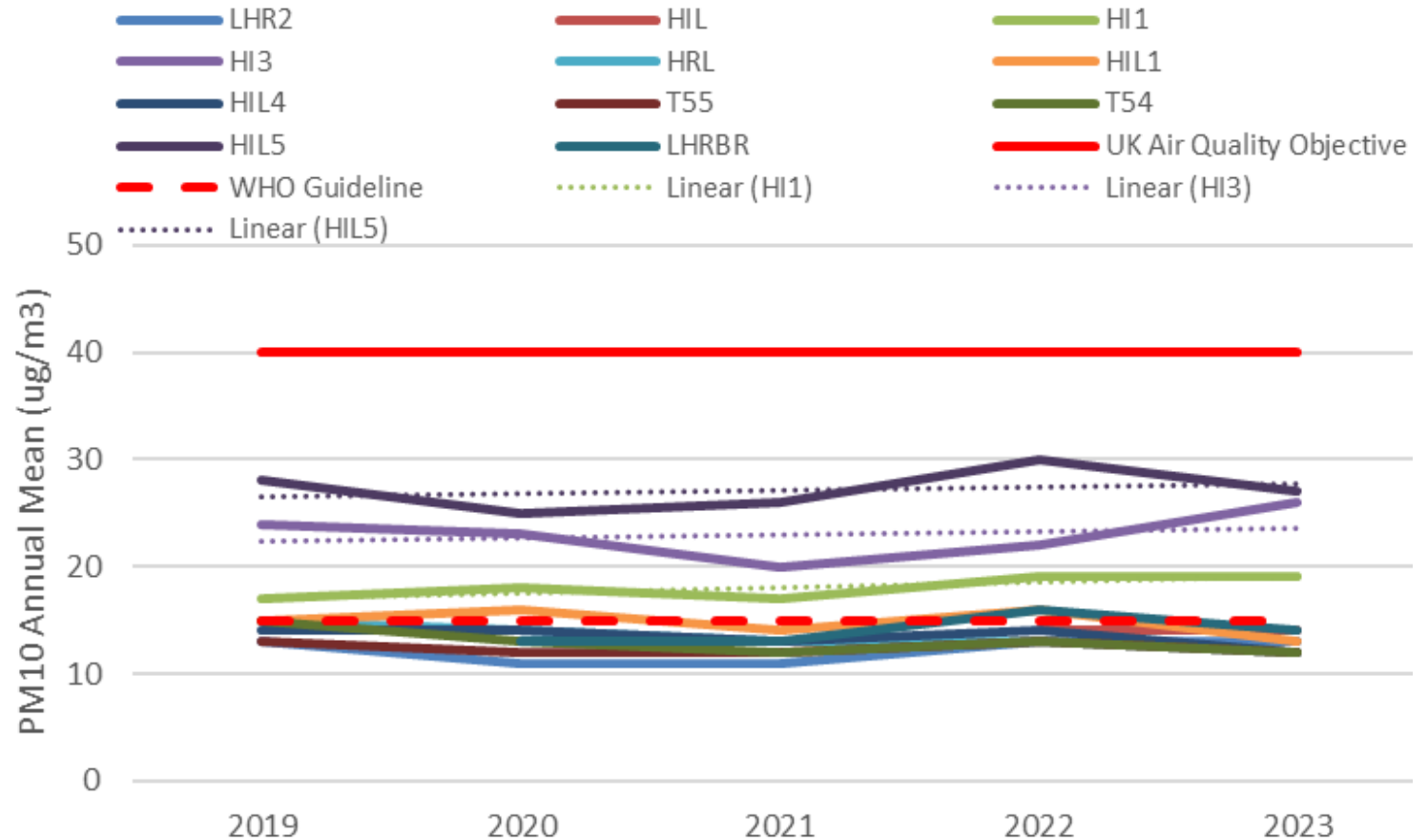
Annual Mean PM₁₀ concentrations (ug/m³) at continuous monitoring sites across the borough.

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For PM₁₀ there has been no observable trend, with a very slight increasing instance at HI1 (Hillingdon Harmondsworth) and HI3 (Hillingdon Oxford Avenue) sites over the period 2019 – 2023

The levels are considerably below the UK air quality objective, but some monitors are reporting increases substantially above the WHO guidelines. This illustrates the need to keep prioritising action to minimise pollutants as much as feasible.

PM₁₀ Annual Mean Concentrations



Trends in pollution levels across Hillingdon

PM_{2.5}

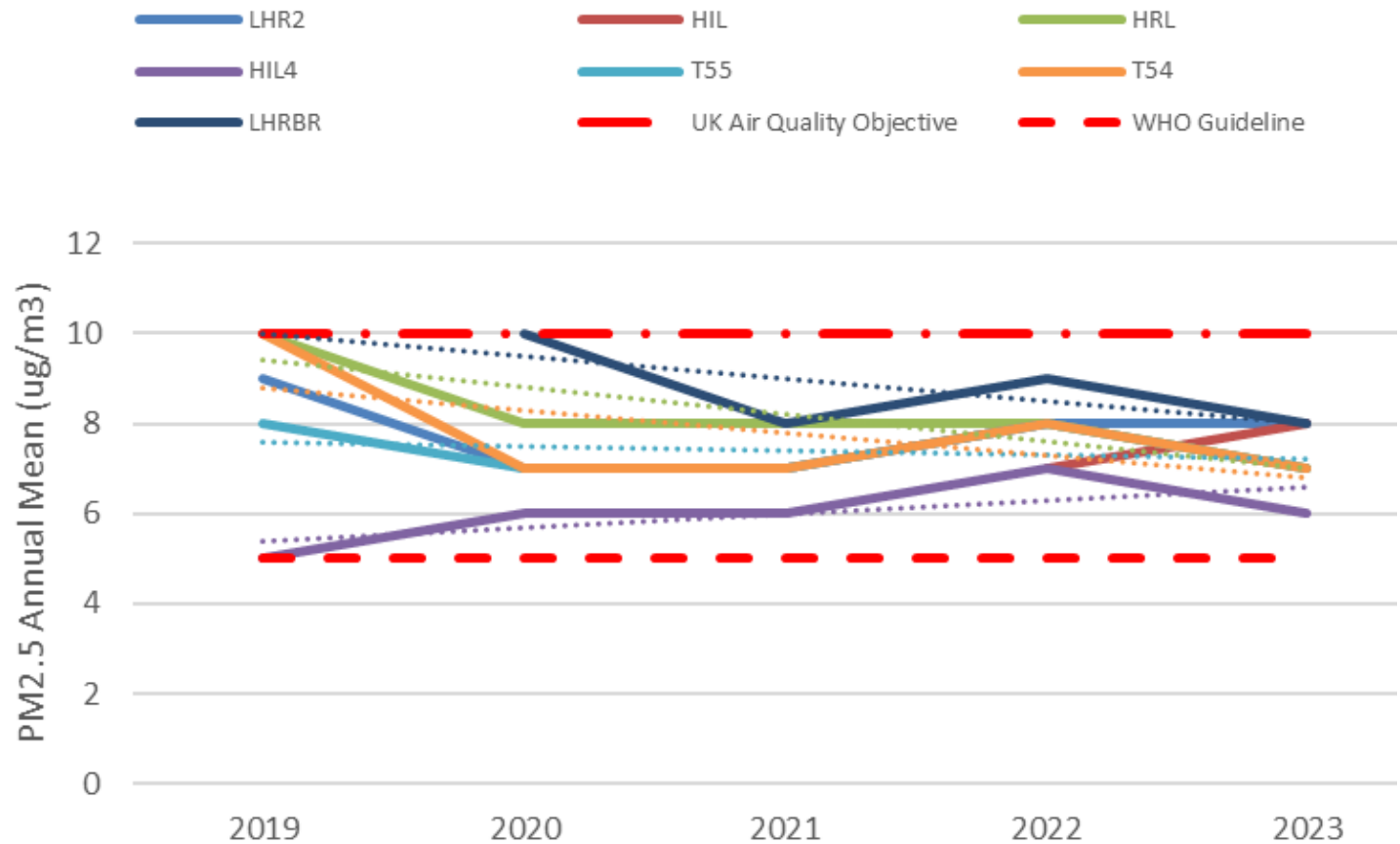
Annual Mean PM_{2.5} concentrations (ug/m³) at continuous monitoring sites across the borough.

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PM_{2.5} data shows an overall declining trend with the exception HIL4 (Hillingdon Harmondsworth) that presents a very slight increasing tendency over the period 2019 - 2023.

Monitoring data indicate that pollutant concentrations are generally decreasing over time and therefore air quality in Hillingdon is improving. However, whereas LBH is currently meeting the national objectives for PM₁₀ and PM_{2.5}, the objectives for NO₂ are not yet being met at some locations within the borough (please see ASR 2023).

PM_{2.5} Annual Mean Concentrations



Conclusion on trends

It is acknowledged that there are no safe limit levels for pollutants and the national legal objectives are far higher than the WHO recommended guideline values. For this reason, in the London Environment Strategy the Mayor has committed to meeting the WHO health-based guideline limit (interim level 4, $10\mu\text{g}/\text{m}^3$) for $\text{PM}_{2.5}$ across London by 2030.

A key area of focus for the council will be to strive towards meeting the most recent WHO guideline limits (as published in 2021) and assist in meeting the 2030 target.

Notwithstanding that, air quality in the borough has generally improved over the last air quality action plan timeframe, as demonstrated by the monitoring data. This is positive and the trend in air pollution is generally downwards although the principle aim of the action plan is to increase this rate of the decline.

Ultrafine PM

Ultrafine particles ($\text{PM}_{0.1}$) ('UFP') represent an area of emerging concern with relatively less scientifically understanding as to their impacts. UFPs are not widely monitored but recent research indicates they pose a

significant threat to health:

Ultrafine particles ($\text{PM}_{0.1}$), which are present in the air in large numbers, pose a health risk. They generally enter the body through the lungs but translocate to essentially all organs. Compared to fine particles ($\text{PM}_{2.5}$), they cause more pulmonary inflammation and are retained longer in the lung. implications.

(source:
<https://www.nature.com/articles/s12276-020-0403-3>)

There is no requirement for Local Authorities to measure or monitor UFP in the UK. The EU has only recently adopted monitoring requirements for UFP and in doing so recognize the importance of understanding this pollutant.

A particular concern relates to aviation with a recent study at Charles De Gaulle, Paris, highlighting the links with aviation:

52 million people - more than 10% of Europe's total population - live within a 20km radius from the 32 busiest airports in Europe and are particularly exposed to ultrafine particles from aviation, new research by CE Delft and commissioned

by T&E finds. In Paris, one of the cities included in the study, 8 million people are affected by its two main airports Charles de Gaulle and Orly. The exposure to ultrafine particles can be linked to the development of serious and long-term health conditions, including respiratory problems, cardiovascular effects and pregnancy issues.

(Source: Ultrafine particles from planes put 52 million Europeans at... | T&E)

The presence of Heathrow Airport in the south of the borough gives rise to significant additional concerns relating to UFPs and consequently, we need to improve our monitoring in and around the Heathrow Villages ward to support the existing monitoring framework and to ensure that we are putting the health of residents first.



3. Hillingdon Air Quality Management Area

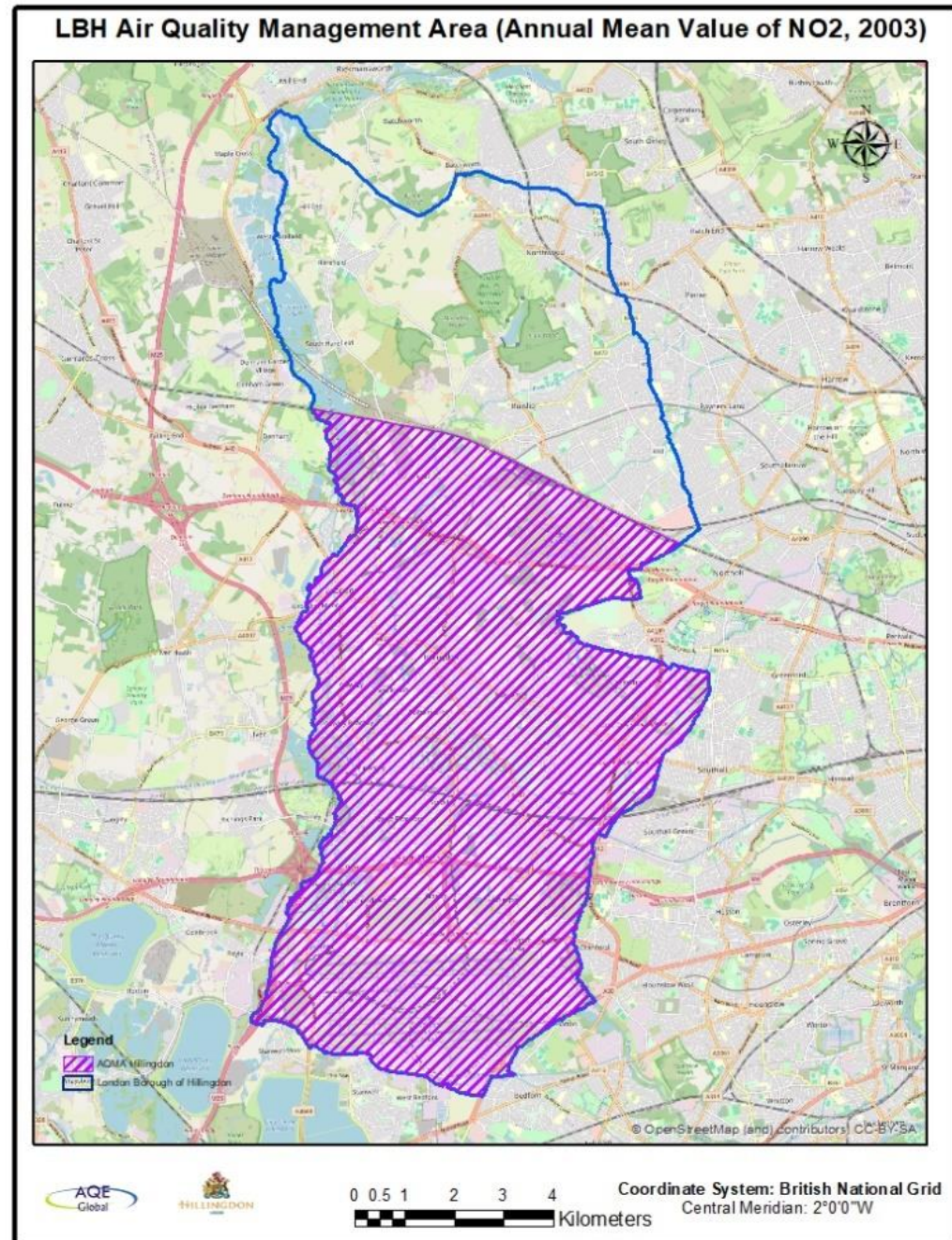
In 2003, we declared an Air Quality Management Area (AQMA) within the borough. The AQMA was declared due to exceedance of the NO₂ annual mean objective (40µg/m³, the UK Annual Mean Limit value for this pollutant) and covered all the borough south of the Chiltern-Marylebone railway line.

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What is an 'Air Quality Management Area'?

An Air Quality Management Area (AQMA) is an area where the air quality objectives are not likely to be achieved and there is relevant public exposure to air pollution.

Areas that have been declared as an AQMA must have an action plan to detail measures to address the air pollution problem.



4. Air Quality Focus Areas

Our core aims commit us to focusing on tackling air pollution where communities are most exposed to poor air quality in order to both safeguard human health and eliminate health inequalities.

Identifying Air Quality Focus Areas (AQFAs) allows us to prioritise where to focus our attention to deliver these aims.

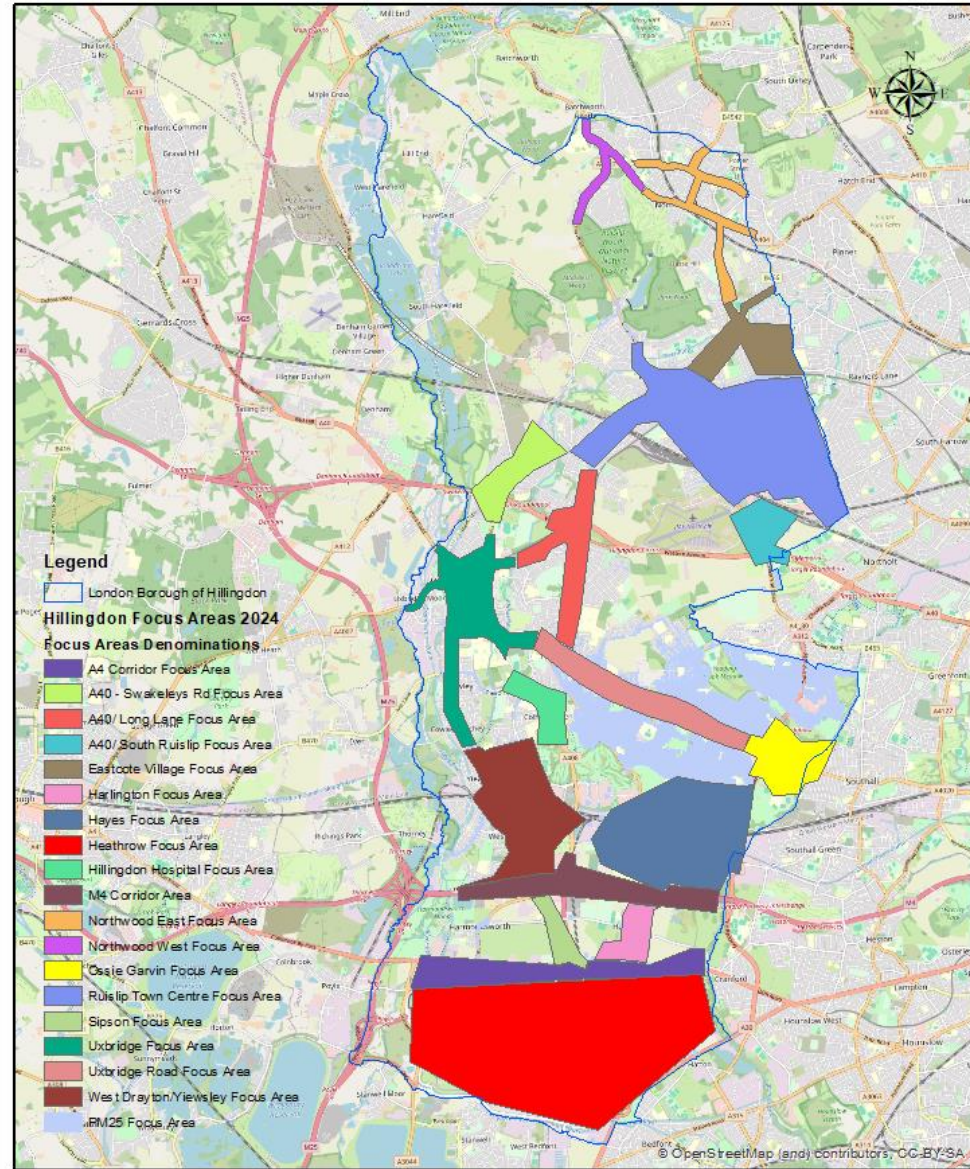
What is an Air Quality Focus Area?

GLA assessed Air Quality Focus Areas (AQFA) are locations that have previously exceeded EU annual mean limit value for nitrogen dioxide (NO₂) but are also locations with high human exposure.

We have supplemented those AQFAs with additional locations in our borough that have also recorded high levels of PM_{2.5} and PM₁₀. This approach preceded the regulatory framework around these two pollutants as recognised focusing on NO₂ was not sufficient.

Our AQFAs are not the only areas with poor air quality but they have been defined to identify areas where currently planned measures to reduce air pollution may not fully resolve poor air quality issues.

London Borough of Hillingdon Air Quality Focus Areas 2024



Coordinate System: British National Grid
Central Meridian: 2°0'0"W

Understanding Air Quality Focus Areas

Analysis conducted on both monitored and modelled (LAEI, 2019) pollution levels for NO₂ and PM_{2.5}, alongside mapping of deprivation indices, and/or population exposure have led to a total of 19 AQFAs being identified.

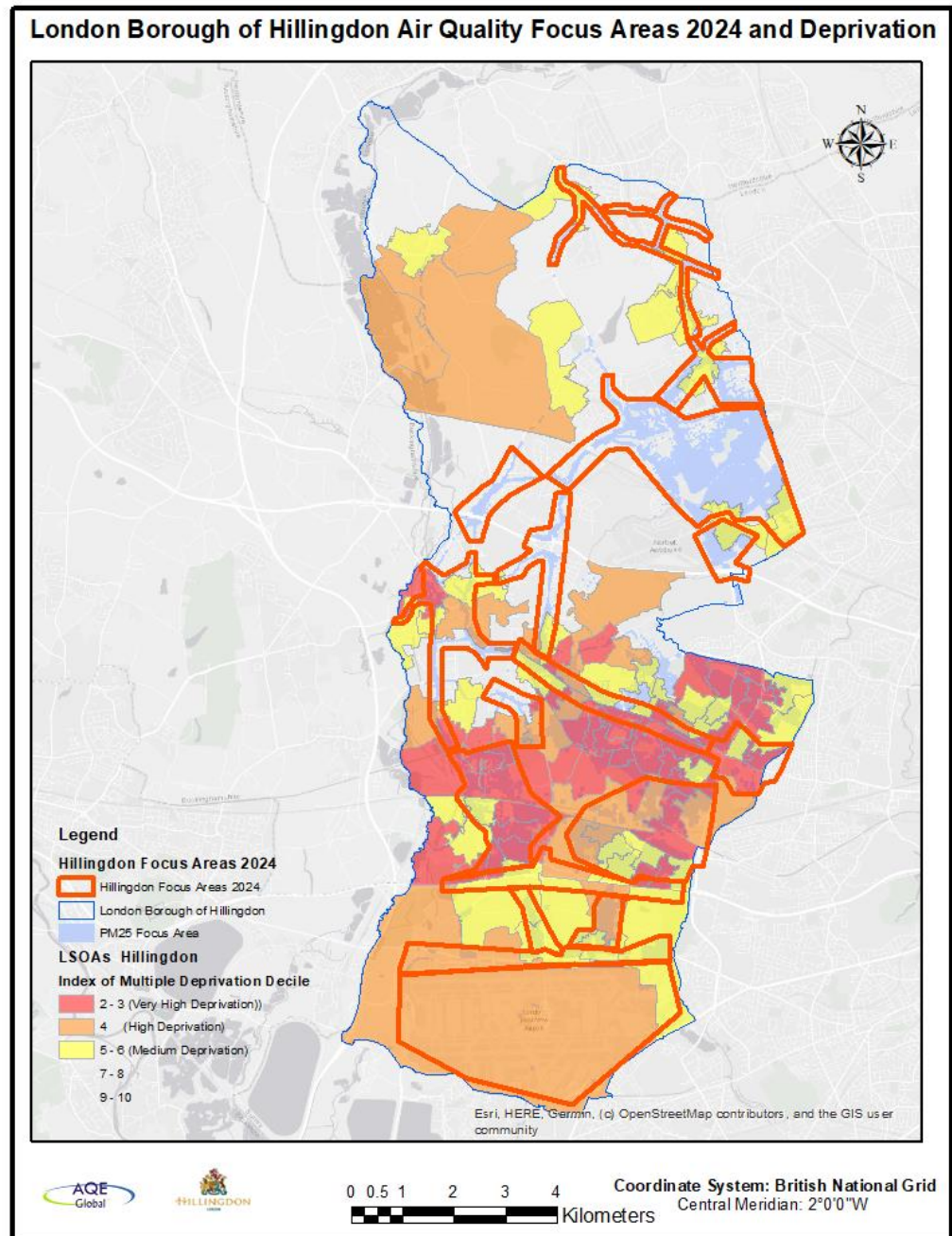
It was also identified that there is a strong spatial correlation between the AQFAs and areas of high deprivation and/or potential growth.

AQFAs are also sensitive to any growth or changes in patterns as these are historically the more polluted areas in the borough. Whilst pollutant levels have reduced there are important points to note:

1. Its too early to determine trends in air quality following the Covid years. Patterns of behaviour are not completely back to pre-covid levels.
2. The AQFAs are all predicted to have air pollution levels that are higher than recommended by WHO throughout the plan period.
3. Air quality is measured at point sources and reported on an annual basis, i.e. averaged. Therefore the reporting does not account for localised hotspots or time sensitive events i.e. the school run.

We will undertake a review of the AQFAs in 2027/28 when more consistent data is available to determine which should still remain designated.

The following tables provide an outline of the reasons for designating the AQFAs.



ID	Name	Justification	Area (m ²)
1	A4 Corridor Focus Area	<ul style="list-style-type: none"> Large number of receptors (1,501) Designated due high levels of NO₂ and PM_{2.5} Forecasted to remain above WHO levels in 2030 High to moderate deprivation. Covers A4 Corridor residential areas 	2,033,420
2	A40 - Swakeleys Rd Focus Area	<ul style="list-style-type: none"> Large number of receptors (1,177) Designated due high levels of NO₂ and PM_{2.5} Forecasted to remain above WHO levels in 2030 Covers residential areas along A40 - Swakeleys Rd 	1,059,740
3	A40/ Long Lane Focus Area	<ul style="list-style-type: none"> Large number of receptors (2,481) Designated due high levels of NO₂ and PM_{2.5} Forecasted to remain above WHO levels in 2030 High to moderate deprivation. Covers residential areas along A40/ Long Lane 	1,578,840
4	A40/ South Ruislip Focus Area	<ul style="list-style-type: none"> Large number of receptors (1,367) Designated due high levels of NO₂ and PM_{2.5} Forecasted to remain above WHO levels in 2030 Moderate deprivation. Covers residential areas along A40/ South Ruislip 	897,099
5	Eastcote Village Focus Area	<ul style="list-style-type: none"> Large number of receptors (2,983) Designated due high levels of NO₂ and PM_{2.5} Forecasted to remain above WHO levels in 2030 Moderate deprivation. Covers residential areas in Eastcote Village and around 	1,489,020
6	Harlington Focus Area	<ul style="list-style-type: none"> Large number of receptors (1,311) Designated due high levels of NO₂ and PM_{2.5} Forecasted to remain above WHO levels in 2030 High to moderate deprivation. Covers residential areas in Harlington 	652,925
7	Hayes Focus Area	<ul style="list-style-type: none"> Extremely large number of receptors (8,209) Designated due high levels of NO₂ and PM_{2.5} Forecasted to remain above WHO levels in 2030 Extremely High to moderate deprivation. Covers residential areas in Hayes 	4,410,290

ID	Name	Justification	Area (m ²)
8	Heathrow Focus Area	<ul style="list-style-type: none"> In spite of the small number of receptors air pollution is high Designated due high levels of NO₂ and PM_{2.5} Forecasted to remain above WHO levels in 2030 High to moderate deprivation. 	10,987,800
9	Hillingdon Hospital Focus Area	<ul style="list-style-type: none"> Large number of receptors (1,358) Designated due high levels of NO₂ and PM_{2.5} Forecasted to remain above WHO levels in 2030 Extremely High to moderate deprivation. Covers residential areas in the Hillingdon Hospital area 	742,288
10	M4 Corridor Area	<ul style="list-style-type: none"> Large number of receptors (972) Designated due high levels of NO₂ and PM_{2.5} Forecasted to remain above WHO levels in 2030 Extremely High to moderate deprivation. Covers residential areas along the M4 Corridor 	1,884,900
11	Northwood East Focus Area	<ul style="list-style-type: none"> Large number of receptors (2,232) Designated due high levels of NO₂ and PM_{2.5} Forecasted to remain above WHO levels in 2030 Moderate deprivation. Covers residential areas in Northwood East 	1,001,510
12	Northwood West Focus Area	<ul style="list-style-type: none"> Large number of receptors (799) Designated due high levels of NO₂ and PM_{2.5} Forecasted to remain above WHO levels in 2030 Moderate deprivation. Covers residential areas in Northwood West 	483,700
13	Ossie Garvin Focus Area	<ul style="list-style-type: none"> Large number of receptors (1,571) Designated due high levels of NO₂ and PM_{2.5} Forecasted to remain above WHO levels in 2030 Extremely High to Moderate deprivation. Covers residential areas in Ossie Garvin area 	1,330,190
14	Ruislip Town Centre Focus Area	<ul style="list-style-type: none"> Extremely Large number of receptors (14,342) Designated due high levels of NO₂ and PM_{2.5} Forecasted to remain above WHO levels in 2030 Moderate deprivation. Covers residential areas in Ruislip Town Centre area 	6,928,820

ID	Name	Justification	Area (m ²)
15	Sipson Focus Area	<ul style="list-style-type: none"> Large number of receptors (466) Designated due high levels of NO₂ and PM_{2.5} Forecasted to remain above WHO levels in 2030 Moderate deprivation. Covers residential areas in the Sipson area 	519,167
16	Uxbridge Focus Area	<ul style="list-style-type: none"> Extremely Large number of receptors (7,076) Designated due high levels of NO₂ and PM_{2.5} Forecasted to remain above WHO levels in 2030 Extremely High to Moderate deprivation. Covers residential areas in the Uxbridge area 	2,441,060
17	Uxbridge Road Focus Area	<ul style="list-style-type: none"> Extremely Large number of receptors (3,999) Designated due high levels of NO₂ and PM_{2.5} Forecasted to remain above WHO levels in 2030 Extremely High to Moderate deprivation. Covers residential areas in the Uxbridge Road 	2,033,420

ID	Name	Justification	Area (m ²)
		area	
18	West Drayton/Yiewsley Focus Area	<ul style="list-style-type: none"> Extremely Large number of receptors (7,080) Designated due high levels of NO₂ and PM_{2.5} Forecasted to remain above WHO levels in 2030 Extremely High to Moderate deprivation. Covers residential areas in the West Drayton/Yiewsley area 	1,059,740
19	PM _{2.5} Focus Area	<ul style="list-style-type: none"> Extremely Large number of receptors (57,138) Designated due high levels of NO₂ and PM_{2.5} Forecasted to remain above WHO levels in 2030 Extremely High to Moderate deprivation. Covers residential areas across the borough (please note that these may overlap with Focus Areas above) 	18,972,000



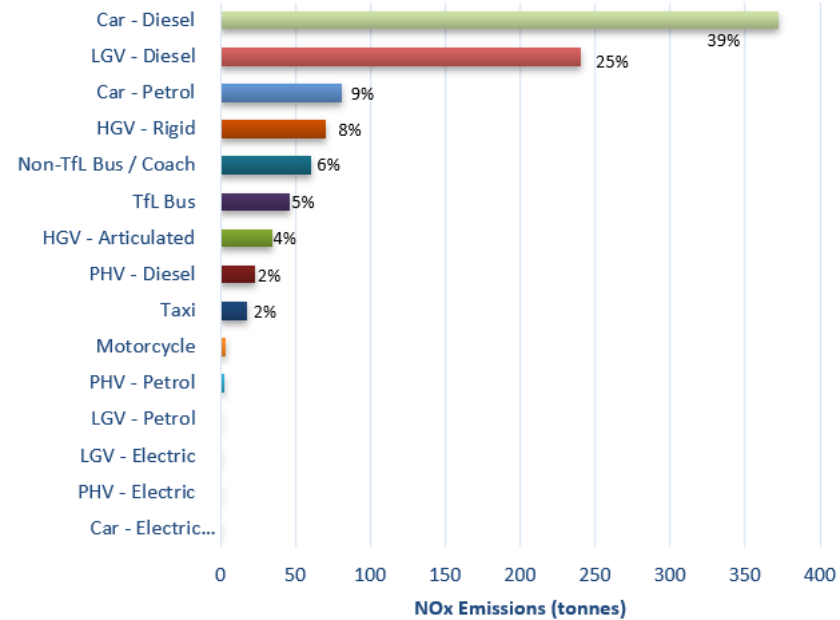
5. Sources of Pollution in the London Borough of Hillingdon

Pollution in the borough comes from a variety of sources. This includes pollution from sources outside of the borough, and, in the case of particulate matter, a significant proportion comes from outside London and beyond the UK.

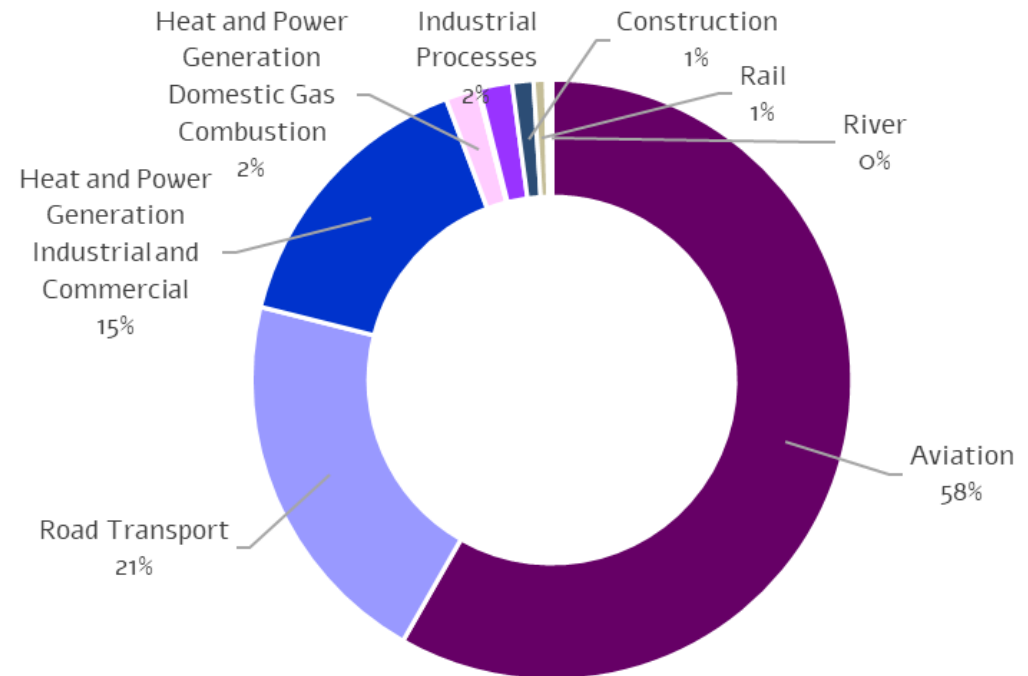
Of the pollution that originates within the borough, the main sources of NO_x and PM_{2.5} emissions are transport, and the main source of PM₁₀ is construction.

Sources of NO_x in Hillingdon

Of the pollution that originates within the borough, the main sources of NO_x emissions are aviation and road transport, followed by industrial/commercial heat/power. NO_x emissions in Hillingdon by source are outlined in Figure 15 and the breakdown of NO_x emissions by road transport type is shown in Figure 16. As shown, the top three road traffic sources are diesel cars (39%), diesel LGVs (25%) and petrol cars (9%).



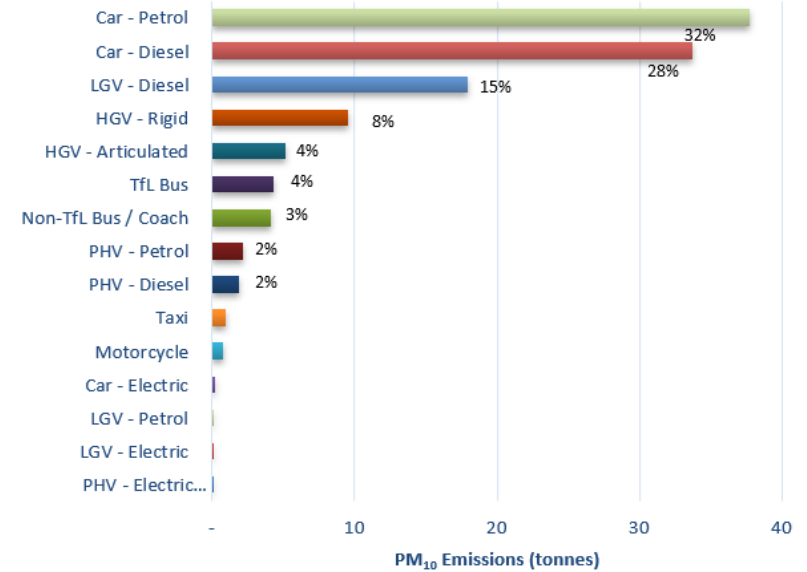
*NB
excludes
aviation
emissions*



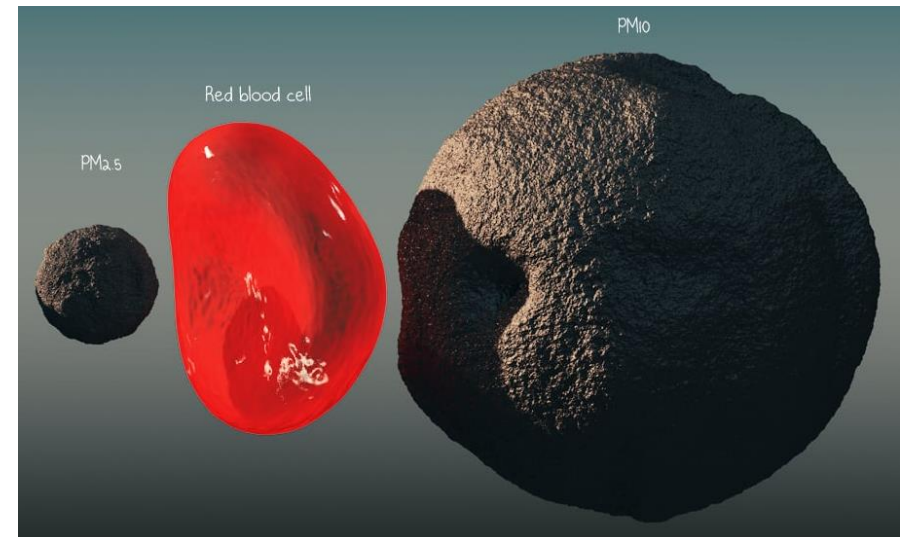
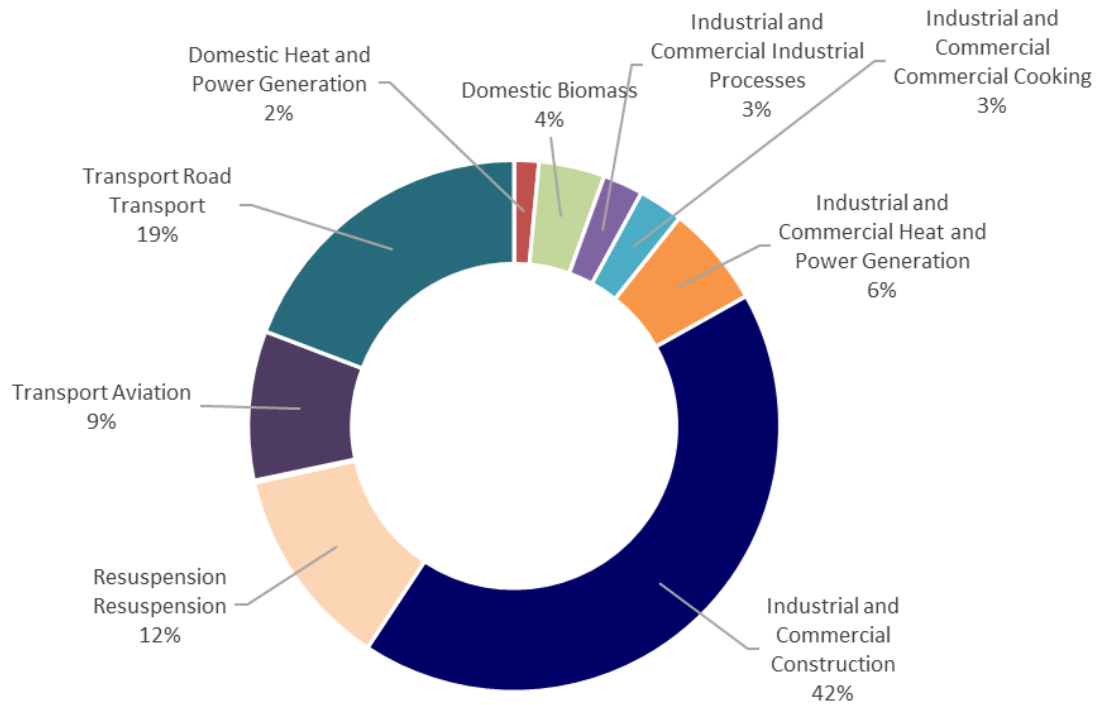
Sources of PM₁₀ in Hillingdon

The figures shows that the main sources of PM₁₀ in Hillingdon are construction (42%) and road transport (19%). Of the road transport sources, Figure 18 shows that petrol cars (32%) and diesel cars (28%) are the top two emissions sources.

All data taken from the LAEI 2019 inventory.



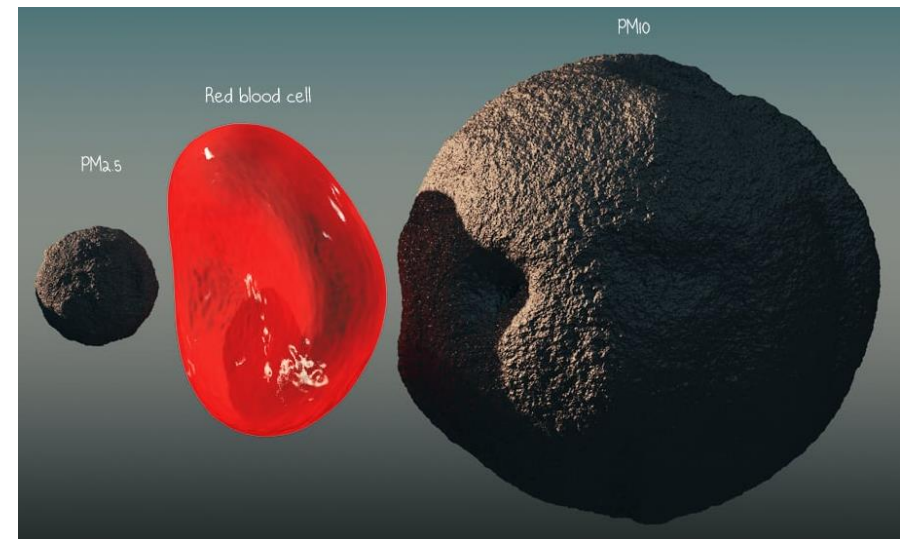
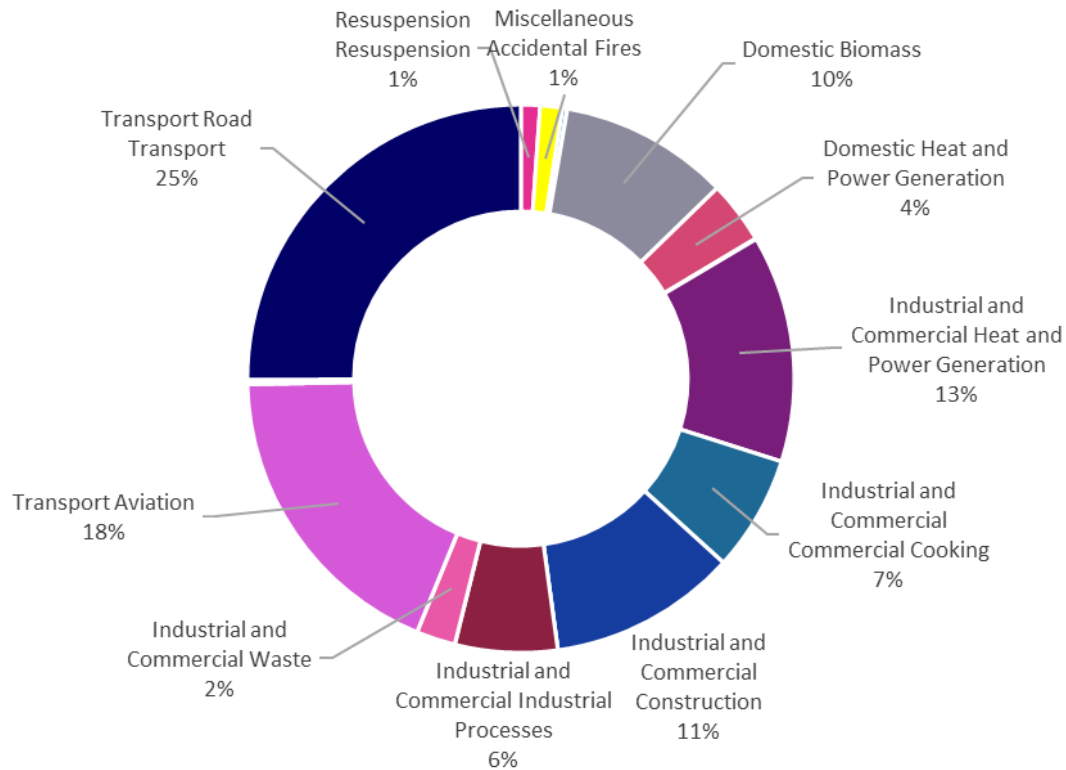
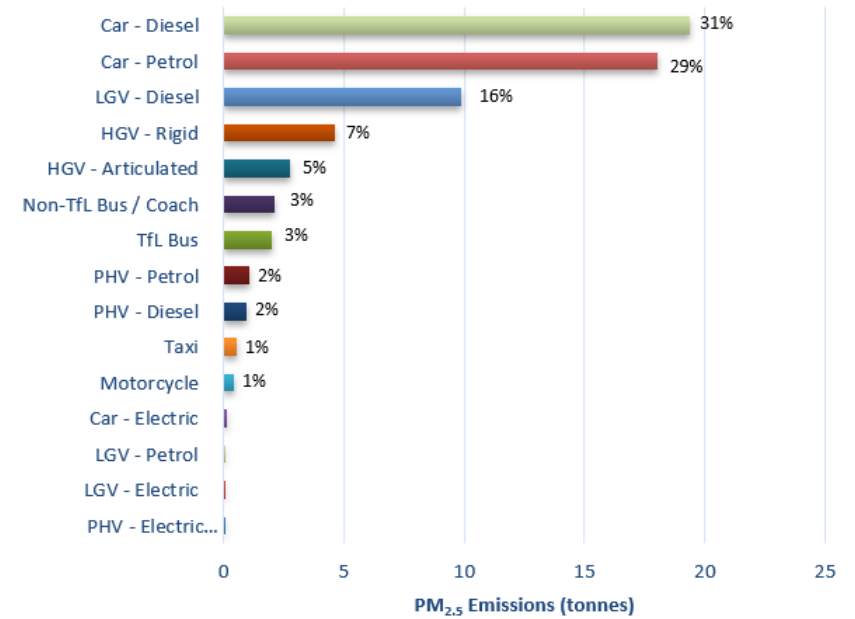
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Sources of PM_{2.5} in Hillingdon

The pie chart shows that, of the pollution originating from within Hillingdon, the main sources of PM_{2.5} are road transport (25%) and aviation (18%).

Of the road transport sources, the graph shows that diesel cars (31%) and petrol cars (29%) are the top two emissions sources.



Air Quality Forecasting

NO₂

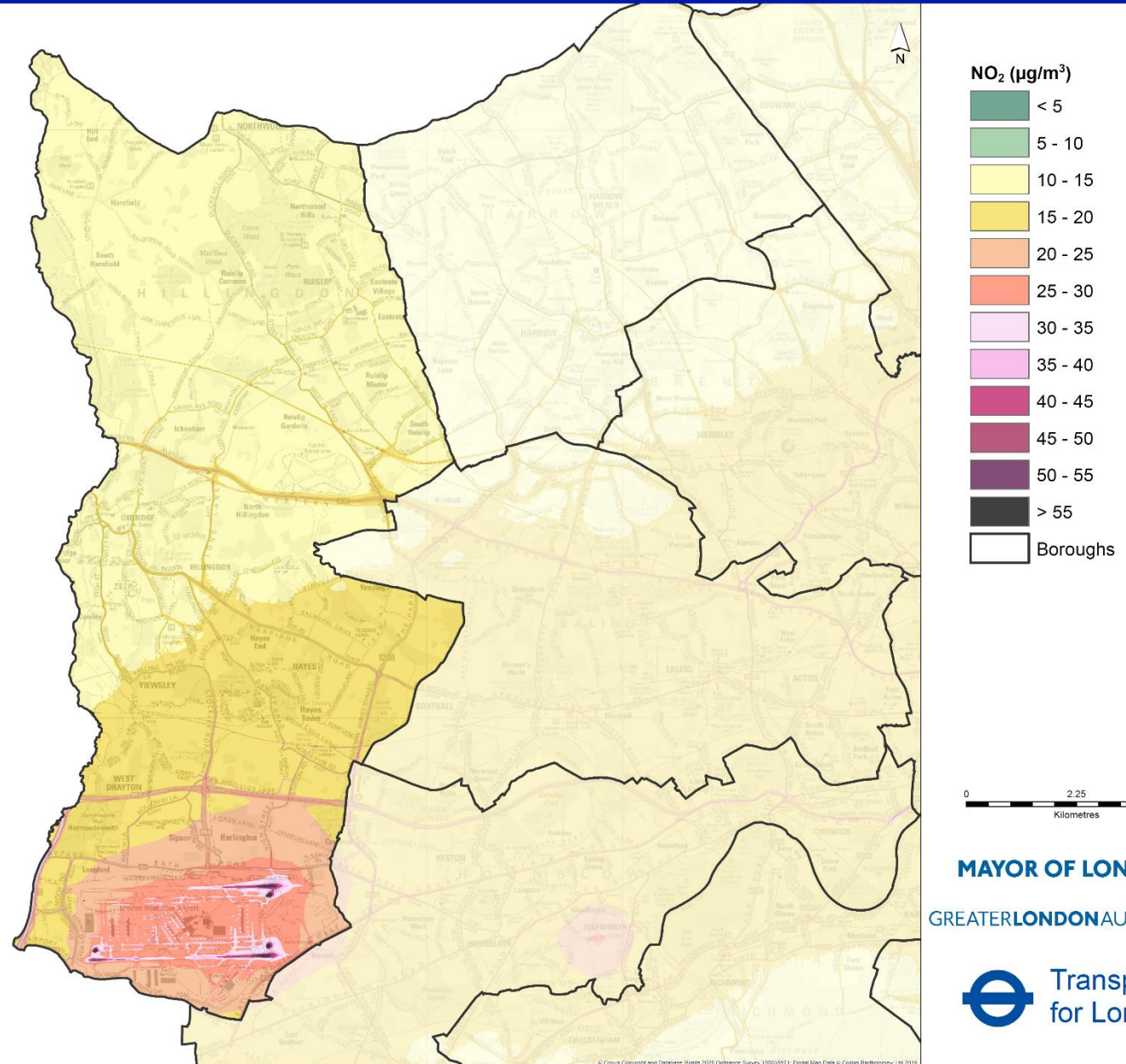
The GLA has undertaken modelling to forecast future air quality to help develop actions and understand future priorities.

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The map showing NO₂ levels in 2030 reveals ongoing concerns in the borough particularly around Heathrow Airport.

Whilst the levels are largely within the current air quality objectives for the UK, there are sizeable areas, that would be within the areas of concern recognised by the WHO.

The modelling takes into account improvements to motor vehicles and enhanced technology to limit emissions. However, the levels remain a health concern requiring targeted interventions.



**Air Quality
 Forecasting**

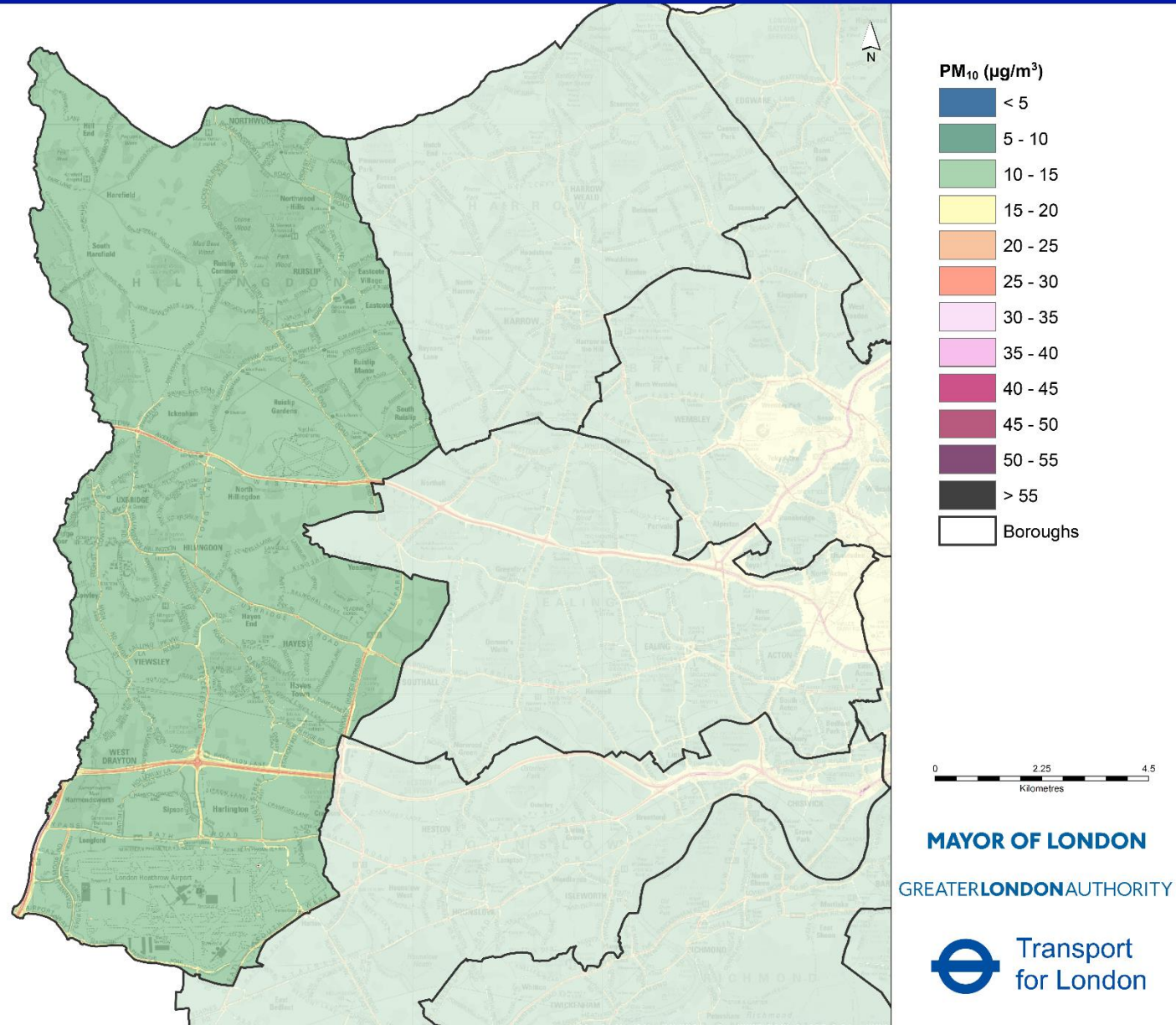
PM₁₀

The GLA has undertaken modelling to forecast future air quality to help develop actions and understand future priorities.

The map showing PM₁₀ levels in 2030 reveals concerns along the main transport corridors although there is a clear improvement from the baseline position.

Once again, although the levels are broadly within the UK limits they are shown to be on the cusp of the WHO limits of 15ugm/m³

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Air Quality Forecasting

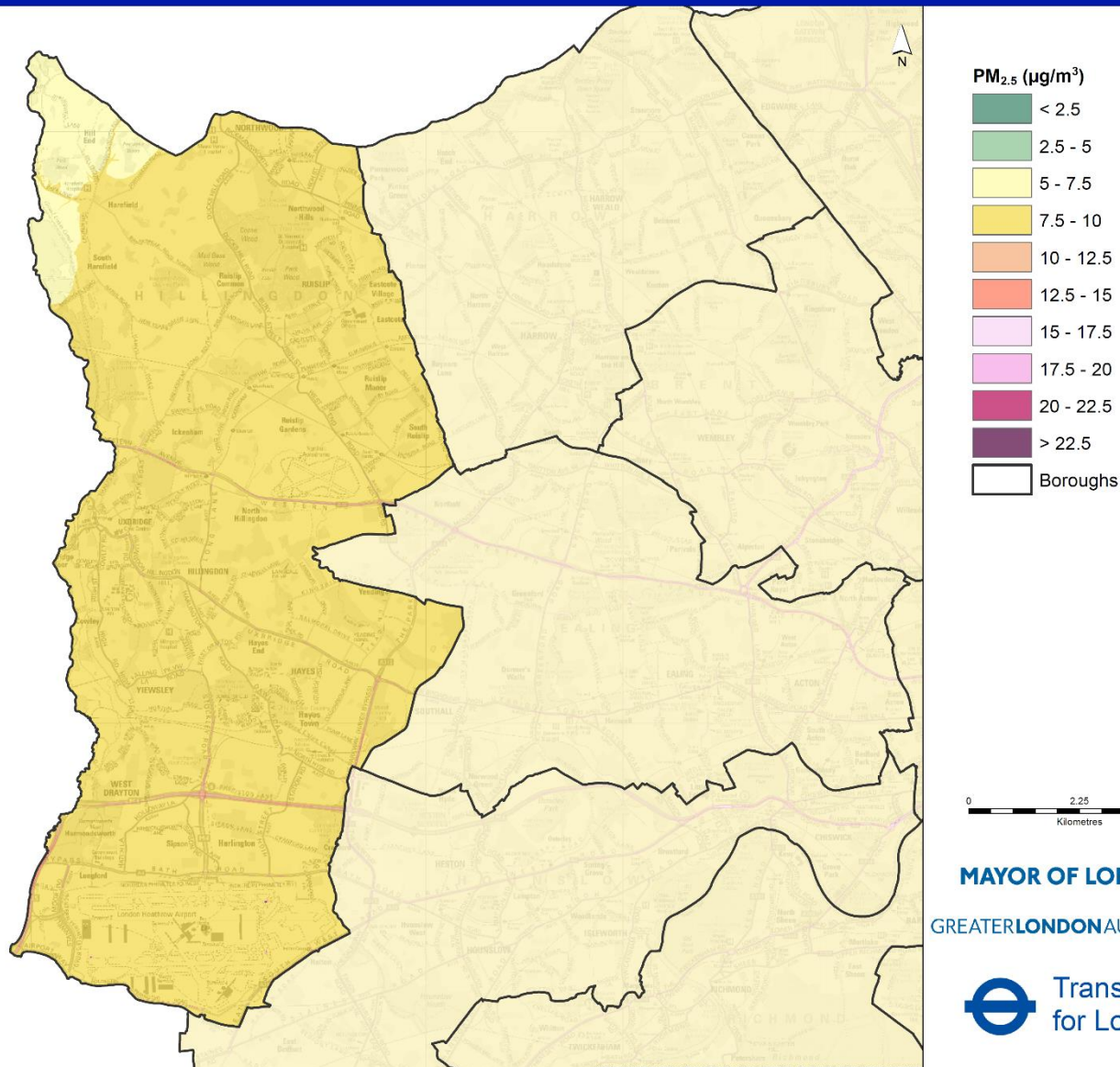
PM_{2.5}

The GLA has undertaken modelling to forecast future air quality to help develop actions and understand future priorities.

The map showing PM_{2.5} levels in 2030 reveals almost widespread compliance with the 2040 UK objective (2030 in London) of 10µg/m³ although the transport corridors remain a concern.

Once again, although the levels are broadly within the UK limits they are shown to be entirely above the WHO limits of 5 µg/m³

Compliance with the WHO target is highly complicated but it does illustrate the disconnect between UK limit objectives and the overall objective of safe levels of air quality.



6. Borough Specific Issues

The information in the previous section reveals that the source of emissions largely fall outside our regulatory control.

In such cases improvements in air quality will require actions by others. We have therefore incorporated additional measures to those identified by the UK Government and the Mayor of London.

Heathrow Airport

The operation of Heathrow involves several different pollution sources which contribute to the local pollution levels, from the aircraft and other on-airport operations within the boundary itself to emissions associated with the road vehicles on the surrounding road networks associated with passengers, staff and freight operations. It is a major source of emissions in the borough.

We remain strongly opposed to the expansion of the airport. One of the key reasons for this is the air quality implications of expanding this pollution source in a densely populated area of the borough already subject to poor air quality.

The forecast information above shows Heathrow Airport to remain a future area of

concern whilst improvements are realised elsewhere in the borough.

Heathrow Airport has a strategy aimed at reducing emissions from their activities. The Council will seek regular updates on progress and challenge the level of ambition and implementation when appropriate.

More is required beyond this strategy and through this Action Plan, we will deliver a specific plan for Heathrow Airport that will target interventions in the local area and challenge the airport operators to help deliver meaningful improvements.

This will also address the monitoring and reporting of ultrafine PM as explained above.

Strategic Road Network

We have a series of major road networks that are routed through the borough. Consequently, there is a large quantity of pollution from transient vehicular traffic. The borough is therefore adversely impacted by its geographical position as a transport corridor connecting London with the surrounding counties.

We have no control over this traffic or the road network to improve flows and to reduce emissions. However, we will continue to

work with the strategic highway network authorities, National Highways and Transport for London to ensure pollution from their managed networks is minimised and considered as part of any changes to the operations.

TFL

The operation of the strategic road network in the borough is the responsibility of TfL. The impact this has on air quality is demonstrated by the fact that several focus areas are associated with roads such as the A40, the A312 and the A4 that are under TfL control. We will work with TfL to ensure improvements in these areas are treated as a priority for action.

In addition, TfL is largely responsible for public transportation that is necessary to deliver a modal shift away from polluting vehicles. Our borough suffers from relatively poor connectivity compared to other boroughs in London. In particular, the north-south corridor is especially poorly served.

Improvements to the public transport provision have been realised but a greater degree of interventions are necessary to drive the modal shift away from polluting forms of private transportation.

7. 2025 – 2030 Priorities

We are committed to ensuring that our communities have cleaner air to breathe. In delivering this commitment we have given priority to specific actions set out in this Plan to improve air quality

Our priorities reflect the areas of action that are most likely to deliver benefits to local air quality directly or indirectly by reducing emissions at its source and or minimising public exposure to pollution to the maximum possible extent.

Theme 1 – Monitoring and Reporting

Actions under this theme play an important role in local air quality management as they enable us to understand where pollution is most critical, and what reduction measures are effective.

We have statutory duties to monitor and report on air pollution levels. These have recently been made more stringent through the Environmental Target Regulations 2023. This necessitates a review of our monitoring network to ensure it is optimum and provides the most useful and relevant information to allow us to understand air pollution in the borough.

Theme 2 – Improving the Urban Environment

This theme is about protecting and improving the environment we live in by managing new development and seeking meaningful interventions to create a healthier urban environment.

Importantly, it is about delivering actions that have multiple benefits, for example biodiversity enhancements through more urban planting, or creating connectivity that directs people away from sources of pollution.

Theme 3- Cleaner transport

Road transport is the main source of air pollution in London. We will incentivise walking and cycling, providing infrastructure to make our streets safer and more inclusive, aiming for a reduction in traffic.

We will deliver more electric vehicle charging infrastructure and work with TfL to provide clean public transport.

We will work to reduce emissions from vehicles delivering goods and services. We will lead by example, by tackling our own fleet means as we seek less polluting vehicles to carry out our vital services.

Theme 4 – Protecting the vulnerable

In addition to protecting communities, we will pay particular attention to the most vulnerable given their susceptibility to much lower pollution levels and also to remove socio economic inequalities.

This will require close collaboration with public health colleagues and utilising existing and creating new channels for education and support.

Theme 5 – Education and Awareness

Schools will remain a focal point for priority action and We will work with schools to help them implement measures to reduce exposure both onsite and on the journey to school. This will focus initially on those in the areas of poorer air quality and where schools are close to busy roads but will be broadened out to all at risk schools and schoolchildren.

Raising awareness and putting in place tools to understand more about air pollution will educate our communities. We will work closely with our public health providers and use online tools to ensure our communities can make healthier decisions, whether this is through the choice of transportation or routes to avoid known pollution hotspots.

8. Theme 1: Monitoring and Reporting

Why it's important

We monitor air quality to conform with our legal responsibility towards our Air Quality Management Area (AQMA) and to capture pollution trends across the borough so we can manage it appropriately. By monitoring air quality around the borough, we can assess our compliance with the air quality objectives, and evaluate the effectiveness of our decision-making process, policies and projects. This can also be used to help provide information and alerts for residents, schools, workers and visitors when pollution levels are elevated.

Sharing air quality information via online tools allows our communities to be engaged with our Local Action Plan activities, be aware of pollution levels and be advised on low exposure actions and routes to protect their health.

What is already happening

We have been successfully running a comprehensive air quality monitoring network over the last twenty years, which includes continuous monitoring sites, nitrogen dioxide (NO₂) diffusion tubes, and more recently, some low-cost sensors. We keep the network under

review so that changes in local conditions, emerging technologies and current thinking around best practices in monitoring are considered.

This approach improves the delivery and performance of services, contributes to a better geographical coverage of air pollution mapping, and contributes to the understanding of health impacts.

What we will do

We will continue to secure a high standard of air quality monitoring network in the borough as well as the timely publishing of real time data to a variety of users through the Council's web page. In addition, we will consider further extending both the coverage and the number of locations monitoring PM_{2.5}.

Based on current evidence, PM_{2.5} is thought to be the air pollutant which has the greatest impact on human health. The Mayor of London has made a commitment to reduce PM_{2.5} concentrations in London to meet the World Health Organisation (WHO) interim guideline of 10 ug/m³ by 2030.

We will improve the number of monitoring stations that record PM_{2.5} and add more low-cost sensors to directly measure the actual concentrations of this pollutant in the borough.

We will also redesign our web page to make it more informative, engaging and educational to the benefit of our communities.

To further understand our pollution sources, we will undertake an emission inventory assessment in the most sensitive areas of the borough.

Finally, we recognize the increasing concerns relating to ultrafine PM and aviation. We commit to improving the spread of monitors to record this pollutant with actions taken to address impacts as they become known.



What we have already achieved

We currently measure air pollution in our borough at:

- 12 automatic continuous monitoring sites,
 - two low-cost sensor monitoring sites and
 - passive diffusion tube monitoring of NO₂ at 44 sites in the Borough
-
- During our previous plan, we have increased our diffusion tube network by 16 locations expanded to include monitoring tubes both outside and inside our AQM so that we now have comprehensive coverage across the borough at identified sensitive areas.
 - We have added an additional automatic monitor in collaboration with Heathrow Airport Ltd. This is located on the Bath Road and monitors NO₂, PM₁₀, and PM_{2.5}.
 - We have also added two low-cost sensors from the London Breathe project which were deployed in 2021 covering both NO₂ and PM_{2.5} and capturing local conditions at Tavistock Road and Harlington Road.

Monitoring and Reporting	What we will do	Responsibility for delivery	Timetable
Action 1	Maintain the delivery of high quality data recording covering all local authority regulated pollutants and ultrafine PM in the Heathrow area	Environmental Specialists	Ongoing
Action 2	Maintain an online repository for all annual status reports that is publicly available	Environmental Specialists	Ongoing
Action 3	Review and improve the air quality monitoring network throughout the borough to ensure: <ul style="list-style-type: none"> ▪ Sufficient geographical scope of equipment ▪ Sufficient spread of monitoring equipment including expanding those capable of recording PM_{2.5} and PM₁₀ ▪ New locations for ultrafine PM ▪ Investing in new low cost sensor technology to be targeted toward priority locations (schools, hospitals, care homes and in Air Quality Focus Areas. 	Environmental Specialists	25/26
Action 4	Roll out monitoring to schools in areas of high pollution and or congestion/poor dispersion conditions. We will extend monitoring to cover sensitive areas that fall into our goals for protecting the vulnerable.	Environmental Specialists	Short / Medium Term
Action 5	Participate in and support the Breathe London monitoring regime. Positively encourage and support citizen science / London Breathe activities where these actively contribute to air quality monitoring and identifying and tackling air pollution in the Borough.	Environmental Specialists	Ongoing
Action 6	Continuing the fulfilling other statutory duties including reporting obligations, regulation of industrial sources, and dealing with complaints of environmental nuisance	Environmental Specialists	Ongoing
Action 7	Undertake emission inventory work at selected sensitive areas within our Focus Areas	Environmental Specialists	Short / Medium Term

9. Theme 2 – Improving the Urban Environment

Why is it important

Industrial, commercial & domestic heating and power generation is one of the main sources of NO₂ and a significant source of Particulate Matter (PM₁₀ and PM_{2.5}) emissions. Traffic associated with new development also generates a significant amount of pollutant emissions.

Unfortunately, a lot of new development is likely to result in a net increase in emissions without any interventions. Industrial uses requiring logistical support or residential units needing car parking will all result in likely increases in air pollution, either through tailpipe emissions, or contributing to tyre and breakpad wear.

Developments that don't directly or indirectly result in additional air pollution is highly unusual. Managing air quality through the planning system is therefore a vital matter and important in considering the built environment.

In addition, positive interventions can have a significant impact in both reducing emission and minimising exposure. Developing these interventions is specific to a local area and can have more meaningful impacts with multiple

benefits, e.g. improving urban wildlife, helping to adapt to a changing climate and improving connectivity for communities.

What is already being done

With regards to new development, we require an air quality zero emission, or better, approach for development proposals that fall within or have impacts in Focus Areas and other sensitive locations.

Whilst the development would still likely contribute to air pollution, this can be offset by mitigation measures and through securing damage costs which form a payment to allow us to implement the actions of this Plan.

We also use the planning system to deliver new facilities including cycling infrastructure, electrical charging points and green planting.

We are participating on a regional project on delivering cleaner construction throughout the south of London, involving 14 local authorities. We have currently inspected more than 400 major sites and are delivering around 85% compliance rates.

We have already undertaken considerably more tree planting with delivery in air quality focus areas as well as within streets and provided air quality screening at many of schools and protected at risk parks.

What we will do

We will continue to pursue better developments using the planning system to result in net improvements in our Focus Area.

We will produce specific Focus Area Action plans and develop approaches to cleaner greener urban spaces. This will be supplemented by a Heathrow Airport Area Action Plan

We will improve connectivity between our well used spaces that reduce exposure to air pollution.

We will continue to enforce the non-road mobile machinery low emission zone in collaboration with key partners.

We will improve the urban environment through creative measures relating to planting and street furniture that not only improves air quality but contributes to wider benefits.



What we have already achieved

- During our previous plan, we have included the need to determine the level of mitigation necessary using Defra's Damage cost approach on total development emissions of NO_x and PM_{2.5} across the borough at identified sensitive areas (e.g. Focus Areas and their catchment areas). We consistently applied our pioneering planning Defra damage cost approach to determine the level of mitigation necessary for development affecting the borough's Focus Areas and hence securing appropriate mitigation.
- We have provided pollution protection screening at all our schools exposed to the most risk
- We sought a zero emissions approach towards developments when located in or affecting sensitive areas such as Air Quality Focus Areas, near vulnerable receptors such as schools, care homes, hospitals, and densely populated residential areas.
- We have made sure that masterplanning and redevelopment areas were aligned with Air Quality Positive and Healthy Streets approaches.
- We have also ensured adequate, appropriate, and well-located green space and infrastructure is included in new developments. We have used green infrastructure as buffer zones between people and roads. We have adopted the same approach to considering new footpaths and cycleways where relevant, i.e. routing people away from areas with higher levels of air pollution.
- We have been ensuring enforcement of Non-Road Mobile Machinery (NRMM) air quality policies in collaboration with our London partner authorities. We undertook 85 construction site audits of which 15 were not compliant and required to comply with the NRMM regulations.
- Diesel generators attached to development such as data centres have proven to be a significant source of pollution over their lifetime (around 25-30 years). We have sought mitigation from these sources using the damage costs approach to gain a S106 obligation when mitigation provided by the developer was insufficient to mitigate total emissions. This approach has been subject to Planning Inquiries and accepted by the Inspectors as a valid and acceptable approach.

Improving the Urban Environment	What we will do	Responsibility for delivery	Timetable
Action 8	Require all new developments (where applicable) are as a minimum air quality neutral applying the DEFRA damage cost approach for those that cannot achieve compliance within the development	Environmental Specialists Team	Ongoing
Action 9	Require all new major developments located in Air Quality Focus Areas to be air quality positive (i.e. result in improvements) and applying the DEFRA damage cost approach for those that cannot achieve compliance within the development	Environmental Specialists Team	Ongoing
Action 10	Continue to be part of the NRMM Project across the south of London and to ensure enforcement of Non-Road Mobile Machinery (NRMM) air quality policies	Environmental Specialists Team / Partner Authorities	Ongoing
Action 11	Increase urban tree planting and landscaping to provide healthier environments	Environmental Specialists Team / Green Spaces	Short / Medium Term
Action 12	Developing and promoting 'clean air' connectivity to town centres and green spaces	Environmental Specialists Team / Highways	Short / Medium Term
Action 13	Produce an air quality Area Action Plan for each Focus Area that identifies interventions and sets out approaches to provide cleaner greener environments. (to be delivered in phases with the first round the areas at highest risk)	Environmental Specialists	Short / Medium Term
Action 14	Produce a Heathrow Airport Air Quality Action Plan identifies interventions and projects that deliver air quality improvements.	Environmental Specialists	Short / Medium Term
Action 15	Ensure that the vision and aspirations in this plan are reflected in all land use planning and decision making to achieve air quality positive outcomes, particularly regarding: <ul style="list-style-type: none"> ▪ The Local Plan ▪ Masterplanning and regeneration strategies 	Environmental Specialists	Ongoing
Action 16	Continue to request robust and enforceable measures to minimise the impact of developments during the construction phase ensuring emissions from construction are minimised to the maximum possible extent	Environmental Specialists	Ongoing

Action 17	Continue to reduce emissions from Combined Heat and Power (CHP).	Environmental Specialists	Ongoing
Action 18	Continue to ensure adequate, appropriate, and well-located green space and infrastructure is included in new developments.	Environmental Specialists	Ongoing
Action 19	Ensuring smoke control zones are adhered to	Community Safety	Ongoing
Action 20	Ensuring that data centres utilise the most low polluting fuel for back up generators and that proposals for their operation are assessed on a reasonable worst case scenario, with clear plans in place for testing and reporting.	Environmental Specialists	Ongoing
Action 21	Ensuring industrial sites regulated by the borough are done so on a frequent basis with appropriate reporting and controls in place	Community Safety	Ongoing

10. Cleaner Transport

Why is it important

Transport emissions contribute heavily to air pollution in the borough, as well as being a major contributor to London wide pollution. Transport accounts for 80% of total emissions. Road transport accounts for approximately 51% of emissions of NO₂ in the borough, if emissions from Heathrow airport are excluded. This contribution increases significantly when closer to busy main roads.

The most effective way to improve air quality is to reduce our use of polluting vehicles and move towards more sustainable and active modes of transport, such as cycling, walking and public transport. This also has positive health and lifestyle benefits beyond just the reduction of air pollution.

However, we can't simply enforce a modal shift away from polluting vehicles. Due to the poor public transport connectivity serving our communities, the car remains an important part of daily life. Enforcing change on residents and businesses where there is no clear alternative can have significant social and economic implications and therefore an appropriate balance must be struck.

We aim to create an environment that provides improved opportunities for low or non-polluting forms of transportation. This combined with awareness raising and education provides the framework to enact change.

What is already being done

We have been promoting modal shift to cycling and walking in the borough, including the construction of new cycling routes, the provision of cycling facilities and the introduction of on-street cycle parking facilities.

We have delivered work funded by transport programmes including the Grand Union Canal Quietways link between Hayes and Cranford Park. This will give residents in Hayes a pedestrian/cycle route choice to access Cranford Park.

The continued implementation of the Canal Towpath upgrade has now provided over 3km of towpath Quietway standard. Further, we have completed Phase 1 of the North Hyde Road which is now more appealing to walking and cycling.

Over the course of the previous Local Action Plan we developed an Electric Vehicle (EV) strategy with short, medium and long term recommendations to increase EV awareness

throughout the borough and increase the provision of infrastructure. We have also included in our procurement policies the requirement to promote use of cleaner vehicle technologies via contract tendering processes.

Our planning system has been significantly instrumental in reducing traffic emissions. It has helped to reduce emissions from deliveries to local businesses and residents via the requirement of robust and ambitious Travel Plans and planning conditions stipulating the requirement for Delivery and Servicing plans to be a minimum of Fleet Operator Recognition Scheme (FORS) silver award. It has also strongly supported the use and managed expansion of car clubs as a method of reducing the number of vehicles in our borough.

We have replaced a large number of outdated diesel-powered vehicles from our own fleet and increased the percentage of electric vehicles.

What we will do

In conjunction with our Local Implementation Plan (transport planning) we will develop various projects to reduce traffic impacts on air quality within Focus Areas of the borough. We will carry out area specific air quality action plans in our Focus Areas which will review traffic and building sources, traffic management, parking, obstructions, and

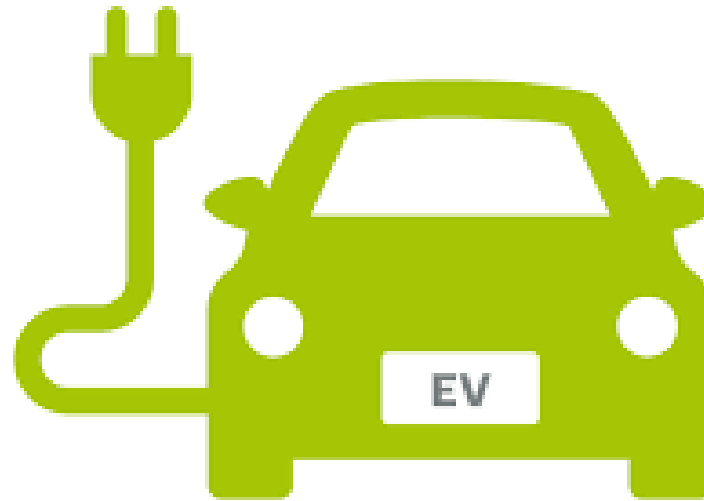
deliveries.

We will create an environment which promotes cycling and walking, including a change to infrastructure and green planting. We are committed to linking our Air Quality Action plan with our Cycling Strategy so that synergies and benefits arise from concerted action across the Borough.

We will continue to effectively use the planning system to reduce transport emissions to the maximum extent possible via zero emissions' approaches, appropriate mitigation requirements and S106 obligations.

We will continue to lobby those responsible for sources of pollutants from transport outside our control.

We will continue to review our fleet replacement and ensure that electric remains the preferred option for all replacements with clear justification presented where this is not preferred option.



What is already being done in Hillingdon

- During our previous plan, we have upgraded the towpath on Grand Union Canal from the southern borough boundary to Cowley.
- We have been using the council procurement policies to promote use of cleaner vehicle technologies via contract tendering process. All council contracts stipulated FORS registered and a minimum of Euro VI/6. The specific inclusion of low/zero emissions technologies has been investigated in 2020/2021. All fleet vehicle replacement tenders have been seeking two tenders: one for diesel - fuelled and one for electric.
- Planning conditions on new development stipulated the requirement for Delivery and Servicing plans to be a minimum of FORS silver award. This included the requirement to report on fuel usage and emissions of CO₂, NO_x and PM emissions plus a policy to actively reduce fuel consumption and minimise their environmental impact.
- The council fleet replacement programme included the upgrade of 77 specialist vehicles to Euro VI/6. These all meet the LEZ standard.
- Our own fleet has been enhanced through the following:
 - New fully electric pool cars
 - Additional self-charging hybrid pool cars.
 - 32 fully electric vans have replaced diesel versions.
- The TfL bid to Green and Healthy Streets Fund was successful with the Hayes Focus Area North Hyde Road study actions being prioritised for implementation. TfL funds have been supplemented with air quality S106 funds.
- Transport and Air Quality policies as well as projects have been integrated via the implementation of the Healthy Streets in LIP projects. Successes include the residents led Healthy Streets Transport Study for Oak Farm residential area with a series of recommendations put forward.
- Funding has been allocated for a project to audit Hillingdon owned roads in terms of the Healthy Streets Index. This will identify actions for implementation using areas of poor air quality as a priority criterion for action. The Healthy Streets study is currently being scoped. Priority in terms of timescales will be given to streets in poor air quality areas.

Cleaner Transport	What we will do	Responsibility for delivery	Timetable
22	Improve and/or provide walking and cycling infrastructure and create more opportunities for modal shift away from polluting vehicles	Environmental Specialists / Highways	Ongoing
23	Promote the use of cleaner walking and cycling routes in the context of reducing exposure to air pollution	Environmental Specialists / Highways	Ongoing
24	Promote the use of low emission vehicle technology through appropriate measures and targeted action.	Environmental Specialists / Highways	Ongoing
25	Reduce emissions from Council vehicles.	Procurement	Ongoing
26	Support and enhance the delivery of the Council cycling strategy in the context of reducing air pollution and minimising exposure to it	Environmental Specialists / Highways	Ongoing
27	Identify opportunities through the Air Quality Area Action Plans to improve opportunities for cleaner modes of transportation	Environmental Specialists / Highways	Short/Medium Term
28	Ensure transport planning and plans (i.e. Local Implementation Plan) aligns with the aims and objectives of this plan	Environmental Specialists / Highways	Ongoing
29	Ensure that reviews of parking policies and strategies align with the aims and objectives of this plan	Environmental Specialists / Highways	Ongoing
30	Encourage local business to use with low-carbon transport alternatives such as e-Cargo bikes, as well as encouraging take up of low emission vehicles.	Environmental Specialists / Highways	Ongoing

31	Include policies in procurement strategies to promote the use of cleaner vehicle technologies via contract tendering processes.	Environmental Specialists / Highways	Ongoing
32	Continue to lobby TfL, so that cleaner buses are deployed to our borough	Environmental Specialists / Highways	Ongoing
33	To work with TFL to secure an annual report on actions and performance to improve air quality in the borough: <ul style="list-style-type: none"> ▪ through improvements to their fleet ▪ through public transport improvements 	Environmental Specialists/TFL	Ongoing
34	Year on Year increases in electric vehicle charging infrastructure and review opportunities to maximise geographical scope (i.e. on street parking where appropriate and feasible)	Environmental Specialists / Highways	Ongoing
35	Continue to promote and enforce no-idling and identify areas that require targeted interventions, i.e. at schools and other sensitive places.	Environmental Specialists / Community Safety	Ongoing
36	Continue to work in partnership with Highways England to ensure effective mitigation of arising air quality impacts on the local communities.	Environmental Specialists	Ongoing
37	Continue to work in partnership with HS2 Ltd to ensure effective mitigation of any arising air quality impacts on the local communities relating to HS2 construction activities.	Environmental Specialists	Ongoing

11. Theme 4: Protecting the Vulnerable

Why is it important

2021 WHO Global Air Quality Guidelines (AQGs) have provided clear and robust evidence of the damage air pollution inflicts on human health, at even lower concentrations than previously understood. The guidelines recommend updated, much lower air pollution levels to protect the health of populations. Eliminating or minimising exposure to air pollution is critical to health and wellbeing.

Children, are particularly vulnerable and air pollution can lead to reduced lung growth and function, respiratory infections and aggravated asthma. In adults, ischaemic heart disease and stroke are the most common causes of premature death attributable to outdoor air pollution, and evidence is also emerging of other effects such as diabetes and neurodegenerative conditions.

The report 'Every Breath You Take' (2016) produced by the Royal College of Physicians and the Royal College of Paediatrics and Child Health uses the term 'vulnerability' to express the broad range of determinants whereby the

health impacts of pollution are unequal. It includes a person's biological susceptibility as well as environmental, social, economic, and behavioural factors that may make a person more susceptible to air pollution.

Research also indicates clear links between air pollution and areas of deprivation. It shows that people in deprived areas are disproportionately more exposed to higher concentrations of pollutants, often because their homes, workplace or local schools are located near busy roads with high concentration of vehicle emissions, which is a major contributor of air pollution in London.

The Royal College of Physicians have recommended healthcare professionals assist vulnerable patients to protect themselves from the worst effects of air pollution. For those with asthma for instance, NICE (National Institute for Health and Care Excellence) highlight the importance of including advice within personalised action plans on reducing exposure to outdoor air pollution.

In their general guidance on air pollution, NICE also highlighted the need for healthcare professionals to be aware of vulnerable groups who could be affected by air pollution and for them to give general advice on how to minimise exposure, including giving informational materials.

What is already being done

We have worked with other northwest London air quality and national health colleagues to roll out a campaign to all GPs across the region alerting them to the availability of AirText for their vulnerable patients and included an animated video on the impacts of air pollution on health plus an introductory leaflet on the harmful impacts on health from air pollution.

We have also been engaging with schools via the "Provision of walking maps" project to schools in the borough, with almost 70 schools engaged. We promote School Travel Plans and are members of TfL STARS school travel plan accreditation scheme.

We have been doing extensive work on discouraging unnecessary idling by taxis and other vehicles with particular incidence at school locations.

The pollution barrier project at schools was completed in 2022/2023. This has created green barriers at over 49 schools across the borough. In addition, 40 trees have been planted in local schools and the concept of the introduction of Nectar Cafes is being trialed using plants that are beneficial to insects and other wildlife as well as reducing air pollution. In addition to providing added opportunities for wildlife they will introduce the concept of quiet green zones

within school playing areas.

Aiming at reducing exposure at other sensitive locations, a project to extend the concept of using green infrastructure to protect public exposure to pollution has been implemented at eleven amenity playing areas across the borough. The designs were tailored to each site and a combination of hedging and trees were used to maximise the benefits. Across these and other schemes, a total of 17,295 trees have been planted across the borough.

and social media).

We will work with our public health colleagues when developing our Air Quality Action Plans to ensure we have local specific mitigation and measures in place to identify and protect the most vulnerable.

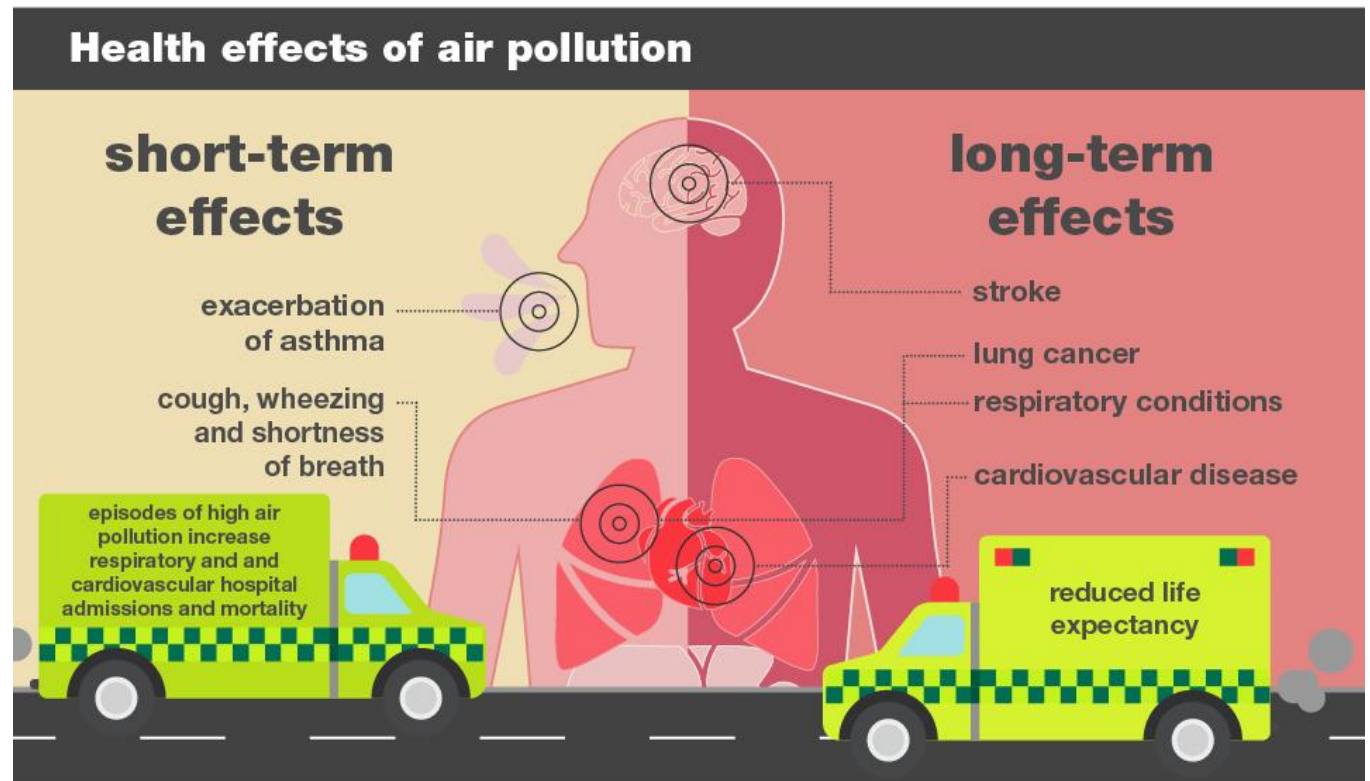
We will also continue to enforce no-idling to reduce emissions in sensitive areas.

We will prioritise at risk schools for further interventions with action plans to be in place for those exposed to the highest levels of risk.

What we will do

Our priority action will be to design a project aiming at delivering a series of sessions to GPs and Health Centre facilities with a view to train them as air quality champions so that they can advise patients regarding pollution exposure reduction strategies. As part of the project, information materials will be produced and disseminated at key locations including schools and health facilities.

We will extend this project to include a series of workshops in schools reaching pupils and parents, engaging students with personal monitoring activities to ascertain high and low pollution routes when commuting to school, and the production and dissemination of various materials through a variety of media (webinars, videos, maps, leaflets, web pages,



What is already being done in Hillingdon

- All schools were alerted to the No Idling webinars.
- All schools have been alerted to the London Schools Pollution helpdesk. The Travel team have encouraged the use of the site in linking the activities to the individual school travel plans to help towards STARS accreditation.
- A total of 63 schools have received walking maps for the school and local area, the maps are displayed at each school entrance, with 11 schools expressing an interest for follow up workshops.
- The bikeability projects have re-started April 2023 with 22 schools booked in for training by the end of July 2023.
- 2023 Launch of the Big Pedal – schools compete to see who can record the greatest numbers of pupils, staff and parents making active journeys to school.
- As of end of 2023, there are 21 Gold, 5 Silver and 9 Bronze accredited schools in the Borough. A number of others are actively engaged with the Council and there are a number of activities being held in terms of sustainable travel and an increasing number interested specifically in air quality issues. In addition, 23 schools are actively engaged in the STARS scheme.
- In 2023 alone, in terms of promoting active travel, 8,849 pupils at Key Stages 1 and 2 have received pedestrian training and 1,203 of Year 6 pupils have received bikeability cycle training.
- All schools now have Walking Maps at school entrances and new footpaths are put in place where possible to encourage active travel.
- We have worked with other northwest London air quality and national health colleagues to roll out a campaign to all GPs across the region alerting them to the availability of AirText for their vulnerable patients and included an animated video on the impacts of air pollution on health plus an introductory leaflet on the harmful impacts on health from air pollution

Cleaner Transport	What we will do	Responsibility for delivery	Timetable
Action 38	Developing a Cleaner Borough project that increases knowledge, supports GPs in understanding and identifying air pollution, and working with schools to find methods to reduce exposure to air pollution.	Environmental Specialists/ Public Health/ Education	2025/26
Action 39	Supporting Airtext alert system	Environmental Specialists	2025/26
Action 40	Promoting the Mayor's air pollution forecasts	Environmental Specialists / Communications	Ongoing
Action 41	Reducing pollution/pollutant emissions in and around schools	Environmental Specialists	Ongoing
Action 42	Expand our School Streets programme to ensure that our schools have updated and robust Travel Plans in place	Environmental Specialists	Short/ Medium Term
Action 43	Identify priority schools for air pollution audits and put in place action plans for those where impacts have been identified	Environmental Specialists	Short/ Medium Term
Action 44	Prioritising anti-idling initiatives near schools, hospitals, care homes, and sensitive residential areas of poor air quality	Environmental Specialists	Short/ Medium Term
Action 45	Working with Public Health Colleagues to ensure the objectives of this plan align with health campaigns and strategies	Environmental Specialists / Public Health	Ongoing

12. Raising Awareness

Why is it important?

The majority of people are responsible for contribution to air pollution to some degree. Whether this is through gas boilers at home, wood burners, or relying on polluting forms of transportation.

It is therefore essential that more people understand their own impacts and what can be done to reduce a contribution.

Importantly, increased awareness fosters a sense of responsibility toward our environment. When people understand the harm caused by pollution, they are more likely to support policies and initiatives that promote cleaner air.

Further, by educating people, we empower them to seek healthcare and address pollution-related illnesses as well as take action to reduce their exposure to poor air quality levels.

What is already being done?

Joint action between air quality, school travel, and public health officers has us to raise awareness of the issue of air pollution and to

jointly take forward actions to help protect the most vulnerable in our communities.

Airtext information, a video and air pollution and respiratory health booklet were prepared by air quality and public health officers in Northwest London. The resources were sent to all GPs in the Northwest Area including in our borough.

We have engaged with 40 schools and delivered air quality awareness workshops . A trial has been undertaken of the delivery of an air quality and active travel education package. Schools also participated in the Mayor of London's 'No Idling' project with children participating in workshops and outside school events.

We have also been actively disseminating information and delivering awareness campaigns to discourage the use of wood burning. We have completed campaigns and messaging aimed to inform residents that the London Borough of Hillingdon has been a declared a Smoke Control Zone

We have contributed to various online tools and websites to provide real time information on air pollution and worked with the Mayor of London on London wide campaigns.

What we will do?

We will continue to develop significant action for raising awareness and communicating the importance of reducing pollutant emissions and personal exposure to air pollution with particular focus on the most vulnerable groups of the population though the lifetime of this Local Action Plan.

We will continue to disseminate information on the importance of complying with the Smoke Control Zone requirements and on the benefits of reducing significantly the use of wood burning devices as well as encourage the use of clean modes of transport.

We will improve online information and reading materials within libraries. We will work closely with GPs to ensure the vital information is understood and delivered through the channels with most impact.



What is already being done in Hillingdon

- Development and delivery of an Air quality raising awareness package for schools. This entailed air quality awareness workshops which were popular and very successful.
 - The aim of the workshops was to:
 - Raise awareness of the potential consequences of poor air quality on health and well-being;
 - Identify the causes of poor air quality;
 - Understand ways pupils can reduce their negative impact on air quality;
 - Motivate pupils to improve air quality and reduce their own exposure by walking, cycling or using public transport, especially for the daily journey to school;
 - Investigate the positive benefits of using sustainable travel;
 - Inspire pupils to motivate your entire school to make a positive change on air quality.
- Awareness campaigns and messaging informing that the borough is a declared Smoke Control Zone along with Council enforcement powers for non-compliance. Article in Hillingdon People magazine and distribution of point of sale posters/leaflets to fuel suppliers. Awareness campaign enhanced by specific information in the Hillingdon People magazine Sept/Oct 2019). This included information on what it means to live in a smoke control zone, the smoke control area regulations and signposting to information on compliant fuels and appliance..
- Article in Hillingdon people magazine in conjunction with Public Health, along with information of the change in legislation in regard to appliances and fuel.
- Advice has been regularly disseminated the using the Council's social media updates asking residents to avoid using wood burning stoves or lighting bonfires.
- Schools also contributed to the Mayors' No Idling project with children participating in workshops and outside school events.

Cleaner Transport	What we will do	Responsibility for delivery	Timetable
Action 46	Raise awareness of the benefits of using low pollution routes to commute to work/school	Environmental Specialists	Ongoing
Action 47	Target schools and health practitioners to raise awareness of air pollution impacts on health	Environmental Specialists	Ongoing
Action 48	Promote the use of greener walking and cycling routes to help the delivery of the Council's transport objective of an increased mode share for walking and cycling	Environmental Specialists	Ongoing
Action 49	Raising awareness of Airtext and Mayor's pollution forecasts	Environmental Specialists	Ongoing
Action 50	Promote the need for more green infrastructure such as hedges along roads, parks, schools, both internally and to all residents	Environmental Specialists	Ongoing
Action 51	Promote the Smoke Control Zone and educate about the harmful impacts of wood burners	Environmental Specialists	Ongoing
Action 52	Work with other London boroughs and the GLA on air quality improvement campaigns	Environmental Specialists	Ongoing

13. Developing the Air Quality Action Plan

In developing the Local Action Plan, we undertook a thorough analysis of the borough's pollution sources, their location in relation to human exposure, and the vulnerability of the receptors involved. Particular attention was paid to our Focus Areas, which are areas with long standing poor air quality, densely populated and or with a high degree of vulnerability, and where current measures are not sufficient to improve the air we breathe.

Step 1: Pre-consultation with GLA

The draft Action Plan will be discussed with the GLA in accordance with policy requirements prior to forma consultation.

This will provide an initial appraisal of the linkages with the wider work across London and to ensure compliance with the regulatory framework.

Step 2: Air Quality Action Plan Steering Group

The draft Action Plan will then be subject to review by our Steering Group which will be formed from members of teams from:

- Highways/Transportation
- Public Health
- Education
- Environmental Services
- Planning
- Communications

Step 3: Public Consultation

Following the finalisation of the Action Plan after Steps 1 and 2, there will be a full public consultation for a minimum of 6 weeks.

A public consultation response document will be prepared setting out the changes to the Action Plan. The final version will be presented to the Steering Group and Elected Members for final sign off.

Step 4: Adoption

Following the public consultation, the Action Plan will be Adopted and made available on the council website.

Step 5: Implementation

Once adopted, the Action Plan will be subjected to an Implementation Plan with timetables presented to the Steering Group.

This Implementation Plan will be a critical part of the process and set out the steps, stages and timelines for delivering the Actions.

Step 6: Monitoring and Review

The Action Plan will monitored in accordance with the Implementation Plan and in close collaboration with the Steering Group, the Cabinet Member for Air Quality and the Residents' Services Select Committee.

An annual statement will be posted online as part of the annual status report for air quality monitoring. This will provide an update on the progress against the actions being taken.

The plan will be subject to full review in 2030.



REVISIONS TO THE LOCAL LIST OF BUILDINGS OF ARCHITECTURAL AND HISTORIC IMPORTANCE

Cabinet Member & Portfolio	Cllr Steve Tuckwell, Cabinet Member for Planning, Housing and Growth
Responsible Officer	Karrie Whelan, Corporate Director of Place
Report Author & Directorate	Neil Robertson, Principal Conservation Officer, Planning and Sustainable Growth
Papers with report	Appendix 1 - Local List Entry for The Orchard Appendix 2 - Local List Entry for the Telephone Exchange Appendix 3 - Local List Criteria Appendix 4- Public Feedback to consultation on Locally Listing the two buildings

HEADLINES

Summary	This report proposes a revision to Hillingdon's Local List of Buildings of Architectural and Historic Importance after undertaking extensive consultation with the community. It recommends that The Orchard in Ruislip is added to the List, whilst it is proposed that further consideration be undertaken before making a decision to include the North Hayes Telephone Exchange on the List.
Putting our Residents First Delivering on the Council Strategy 2022-2026	This report supports our ambition for residents / the Council of: Enjoy access to green spaces, leisure activities, culture and arts This report supports our commitments to residents of: Safe and Strong Communities And if there are any other sub-strategies or policies, e.g. Joint Health & Wellbeing Strategy, Housing Policy add these here.
Financial Cost	The cost of updating the Local List will be met by existing service budgets.
Select Committee	Residents' Services Select Committee
Ward(s)	Ruislip Ward and Hayes Town Ward

RECOMMENDATIONS

That the Cabinet:

- 1) **Considers the responses to the proposed two entries to the Local List as attached in Appendix 4 following Public Consultation;**
- 2) **Approves the addition of The Orchard on Ickenham Road in Ruislip to Hillingdon's Local List of Buildings of Architectural and Historic Importance;**
- 3) **Notwithstanding the outcome of the consultation and findings, agrees to defer consideration at this time on whether to add the Hayes North Telephone Exchange on East Avenue in Hayes to the Local List and delegates a decision on this to the Cabinet Member for Planning, Housing and Growth, in consultation with the Leader of the Council, following the receipt of further information as set out in the report.**
- 4) **Instructs officers to notify all the owners/ occupiers of the addition of The Orchard to the Local List, and for officers to update the GIS database, the Council website and other sources to include the new entry.**

Reasons for recommendations

The Local List of Buildings of Architectural and Historic Importance recognises buildings that are considered to be of local architectural and historic importance that contribute significantly to the unique character and sense of local distinctiveness of the Borough. The initial Local List was adopted in May 2009 following public consultation.

The Hillingdon Local Plan Part One (2012) Strategic Objective states that it is the council's aim to conserve and enhance Hillingdon's distinct and varied environment settings and the wider landscape and will strongly support the retention of heritage assets. Part 2 of the plan para 5.13 states that any site or structure that meets the designation criteria can be added to the Local List, particularly if it can be shown that it contributes to the character of an area and is valued by local residents.

Officers undertook a six-week consultation exercise between 1 January 2025 and 13 February 2025 with the public and carefully reviewed the two buildings to see if they met the criteria as set out in the criteria and scoring for inclusion on the Local List document produced by the London Borough of Hillingdon (2009). Appendix 3 sets how the two buildings clearly meet the criteria expected for inclusion on the Local List.

Furthermore, there is strong community support for both buildings to be added to the Local List with a 97% support rate for The Orchard and 68% for the Hayes North Telephone Exchange. See Appendix 4 for a summary of the consultation.

Officers are at this time seeking approval for the addition of The Orchard in Ruislip to the Council's Local List of Buildings of Architectural or Historic Importance.

However, notwithstanding the outcome of the consultation in respect of the Hayes North Telephone Exchange and suitability for including on the Local List, it is considered further clarification is required in respect of whether any listing of the property could affect the site's future

potential given it's unique design and layout and, therefore, it is proposed that no decision is made on this proposed entry at this time, subject to receipt of further information from officers, with a delegated decision on the matter to be made by the Cabinet Member, in consultation with the Leader of the Council.

Alternative options considered / risk management

The Cabinet could decide not to add neither building to the existing Local List. This would leave such buildings assessed as demonstrating heritage value undesignated and vulnerable to insensitive development. Furthermore, it would not address the concerns of residents.

Select Committee comments

None at this stage.

SUPPORTING INFORMATION

Throughout the Borough, there are buildings and structures that contribute to the quality of the built environment and reinforce local distinctiveness and a sense of place. Whilst not statutorily listed, these buildings are of good quality design or are historically significant. They are important local features in their own right and make a significant contribution to the character and appearance of their locality.

On 13 December 2024, Cabinet Member for Planning, Housing and Growth authorised officers to undertake formal public consultation for adding two new buildings to the Local List:

- i. The Orchard
- ii. North Hayes Telephone Exchange

The public consultation took place over a six-week period from Wednesday 1st January 2025 until Wednesday 12th February 2025. The consultation was undertaken online, informing local residents about the proposed two locally listed buildings providing details of where hard copies of the documents could be found and inviting them to make comments on its content. An advertisement was also placed in the Uxbridge Leader and notifications were sent out through the Council's Facebook Page and Twitter accounts. Lastly, site notices were put up to alert interest parties.

The consultation asked whether or not the two buildings should be added to the Local List. Due to the substantial consultation, 613 responses were received for The Orchard and 430 responses for the North Hayes Telephone Exchange. Of the 613 responses for The Orchard, 593 were in support and 20 against its listing. In relation to the North Hayes Telephone Exchange, 291 responses were in support and 139 against its listing. A summary of the comments can be found in Appendix 4.

The Orchard

The Council received an approach requesting consideration for inclusion on the Council's Local List of Buildings of Architectural or Historic Importance from the Ruislip Resident's Association. Although The Orchard Pub has a modern rear extension the frontage is an attractive surviving

early example of early 20th Century Metroland architecture on a prominent site within the Ruislip Village Conservation Area.

The Orchard is a two-storey building with the principal elevation facing Fiveways roundabout. It has a symmetrical façade of three bays with a substantial central gable. The left and right bays have a planted timber framing painted black with rendered studs between generally comprising of vertical studs with decorative central features and straight brace to each end of the bay. They are punctured by symmetrically set windows framed in brick with the gable projecting above the eaves, The central gable is substantial with a predominance of horizontal studs and a decorative diamond pattern of framing at eaves levels to the flanks. The windows to the upper floor are generally cruciform timber with to the flanks 12 small panes above. The roofs are hipped and of red/ orange clay tile. To the right hand bay the wing stretch back to the modern rear extension. To the left original core there appear to be two pavilion type elements now subsumed in later kitchen extensions. At ground floor level there are a number of post war single storey extensions.

The Orchard contributes positively to the conservation area in particular, as part of a group of important buildings at Fiveways Roundabout. The Orchard Bungalow was constructed in 1905 to provide a refreshment stop/tea garden for visitors enjoying the fresh air and countryside using the metropolitan line traveling from the crowded city centre. This became very popular, and a second storey was quickly added as was a pavilion which could accommodate 500 people. As it was teetotal it was particularly popular with Schools, Sunday Schools and Works outing.

During WW2 the Polish Air Force fighter squadrons airmen and support staff from Northolt treated The Orchard as a second home and is mentioned in many memoirs. Hence the adjacent Locally Listed war memorial.

North Hayes Telephone Exchange

The Exchange is considered a non-designated heritage asset. Council officers assessed the building and considered the building as having architectural and historic interest that may warrant inclusion on the Statutory List of Buildings or Architectural Historic Interest as compiled by Historic England. The North Hayes Telephone Exchange is a fine example of this Brutalist architecture and innovative for its use of pre-cast concrete and an example of exchange buildings completed following the creation of the Property Service Agency established in 1972. In this case the PSA worked with Gray Associates as architectural consultants. The structure is made of pre-cast concrete elements to create an over-articulated language building made up of two linked blocks, one with equipment and the other with welfare rooms and offices. The mullions appear to act as structural columns and take on the characteristics of jointed timber especially as they turn the corner on the lower block. The prominent upturned U shape elements at the top of the higher block house recessed vents to extract warm air vent. Almost all the original features are retained.

The North Hayes Telephone Exchange creates a focal building in the townscape particularly from views across the bowling green and is an example of the effort to produce a building that provides visual stimulation as well as being a functional, efficient and pleasant place to work.

Buildings on the Local List are not subject to any additional planning controls over demolition or alteration. There are also no changes to the owner's Permitted Development Rights under the Town and Country Planning (General Permitted Development) Order 2015. However, Council

policies do support the retention and enhancement of buildings which contribute to the Borough's local distinctiveness.

Hillingdon's Local Plan Part 2 includes policies for the protection of Locally Listed Buildings. The specific policy of most relevance is DMHB3:

DMHB3:

A) There is a general presumption in favour of the retention of buildings, structures and features included in the Local List. The Council will take into account the effect of a proposal on the building's significance and the scale of any harm of loss when considering planning applications, including those for major alterations and extensions. Proposals will be permitted where they retain the significance, appearance, character or setting of a Locally Listed Building.

B) Applications should include a Heritage Statement that demonstrates a clear understanding of the importance of the structure and the impact of the proposals on the significance of the Locally Listed Building.

C) Replacement will only be considered if it can be demonstrated that the community benefits of such a proposal significantly outweigh those of retaining the Locally Listed Building.

Financial Implications

There are no direct financial implications associated with the recommendations to this report. The limited cost of updating the Local List will be met by existing service budgets.

RESIDENT BENEFIT & CONSULTATION

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

The recommendations aim to update the Local List so that buildings and structures that make a positive contribution to the Borough's local distinctiveness and appearance can be recognised. Inclusion on the Local List would have no statutory implications for residents, property owners, or other stakeholders, although Local Listing is a material consideration when decisions are made on planning and other related applications.

There is a broad consensus to the fact that a high-quality built environment impacts positively on people's everyday lives. The qualities of the buildings and the spaces make the area unique and contribute to the sense of place in conjunction with the natural environment. It encourages people to connect, fosters an inclusive and cohesive society, helps strengthen the identity, and engenders civic pride. High quality-built environments arouse interest and generate dynamics that help to attract investors, workers and visitors.

Consultation & Engagement carried out

- 1) Notification letters were sent to the owners and notices were installed at the sites. An online survey was available for residents to complete and a consultation email address was provided. This was supported by the corporate engagement team to insure visibility on the

council's website and relevant social media. A high level of responses was generated with 619 received in total.

- 2) A full summary of responses received is provided in Appendix 4. There was an overwhelmingly positive response for The Orchard, with 97% (593 support and 20 against) of respondents supporting its addition to the Local List. The proposed local listing of North Hayes Telephone Exchange also received positive public support, with 68% (291 support and 139 against) responding positively to the proposal.

CORPORATE CONSIDERATIONS

Corporate Finance

Corporate Finance have reviewed this report and concurs with the financial implications set out above, noting the recommendations to add The Orchard on Ickenham Road in Ruislip to Hillingdon's Local List of Buildings of Architectural and Historic Importance.

Furthermore, it is noted that the costs associated with this report will be in relation to notifying the owners, updating the Council's website, GIS database, and can be met within existing approved budgets.

Legal

When deciding whether to locally list a building, the Council must consider several legal factors including The Planning (Listed Building and Conservation Areas) Act 1990 as well as local and national policies. The Council's eligibility criteria for listing a building must also be satisfied. Once a building is listed locally it will be registered as a Local Land Charge and the Council will take into account the building's special local architectural or historic interest when considering planning applications for alterations and extensions.

Although there is no statutory duty in legislation for the Council to consult when making amendments to its Local List, the National Planning Policy Framework advocates for public consultation as being best practice. Similarly, Historic England also recommends that when Councils update their Local List, they undertake public consultation. Therefore, in the light of the responses from the public consultation that was carried out between 1 January 2025 to 12 February 2025, the Council must balance the concerns of the objectors against its aim to conserve and enhance Hillingdon's distinct and varied environment settings and the wider landscape.

BACKGROUND PAPERS

[London Borough of Hillingdon Local Plan Part 2](#)
[Historic England Advice note 7 Local Heritage Listing](#)
[National Planning Policy Framework](#)
[Hillingdon's Local List](#)

Building Name/No:	The Orchard	Serial No:	333
Address:	Ickenham Road, Ruislip, HA4 7DW		
Ward:	Ruislip	Use:	Pub and Hotel

Photographs:



Fig 1.



Fig 2.

Statement of significance/ Reasons for designation

Authenticity: The Orchard is a good surviving example of the facilities development that took place during the first half of the 20th century thus helping understand the development of Ruislip and in particular military links with RAF Northolt during WW2.

Architectural: The Orchard is a two-storey building with the principal elevation facing Fiveways roundabout. It has a symmetrical façade of three bays with a substantial central gable. The left and right bays have timber framing painted black with rendered studs between decorative central features and straight brace to each end of the bay. They are punctured by symmetrically set windows framed in brick with the gable projecting above the eaves, The central gable is substantial with a predominance of horizontal studs and a decorative diamond pattern of framing at eaves levels to the flanks. The windows to the upper floor are generally cruciform timber with to the flanks 12 small panes above. The roofs are hipped and of red/ orange clay tile. To the right hand bay the wing stretch back to the modern rear extension.

Townscape: The Orchard contributes positively to the conservation area in particular as part of a group of important buildings at Fiveways Roundabout.

Historic/Archaeological Interest: The Orchard Bungalow was constructed in 1905 to provide a refreshment stop/ tea garden for visitors enjoying the fresh air and countryside using the metropolitan line traveling from the crowded city centre. This became very popular, and a second storey was quickly added as was a pavilion which could accommodate 500 people. As it was teetotal it was particularly popular with Schools, Sunday Schools and Works outing.

During WW2 the Polish Air Force fighter squadrons airmen and support staff from Northolt treated the Orchard as a second home and is mentioned in many memoirs. Hence the adjacent Locally Listed war memorial.

Photographs: Fig 1. View of The Orchard from the Ickenham Road roundabout. Fig 2. Historic postcard image of The Orchard.

Location Map



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Authenticity: 1; Architectural: 2; Townscape: 2; Historic/Archaeological: 2.

Total = 7

Recommendation: Inclusion in the Local List and recommend for Statutory Listing to English Heritage

Building Name: North Hayes Telephone Exchange

Serial No: 332

Address: East Avenue, Hayes UB3 2HW

Use: Telephone Exchange

Statement of significance:

Authenticity: Score 3

The Hayes North Telephone Exchange remains used by British Telecom. Accordingly, the original structure made of pre-cast concrete elements to create an over-articulated language building made up of two linked blocks, one with equipment and the other with welfare rooms and offices. The mullions appear to act as structural columns and take on the characteristics of jointed timber especially as they turn the corner on the lower block. The prominent upturned U shape elements at the top of the higher block house recessed vents to extract warm air vent. Almost all the original features are retained.

Architectural: Score 3

The North Hayes Telephone Exchange is a fine example of exchange buildings completed following the creation of the Property Service Agency established in 1972. In this case the PSA worked with Gray Associates as architectural consultants.

It is a fine example of this Brutalist architecture and innovative for its use of pre-cast concrete

Townscape Score 1

The Hayes North Telephone Exchange creates a focal building in the townscape particularly from views across the bowling green.

Historic/Archaeological Interest Score 2

The Hayes North Telephone Exchange is an example of the effort to produce a building that provides visual stimulation as well as being a functional, efficient and pleasant place to work.

Total Scoring against the criteria: 9

Recommendation: Inclusion in the Local List and recommend for Statutory Listing to English Heritage

Local Plan

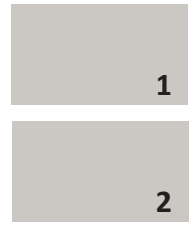
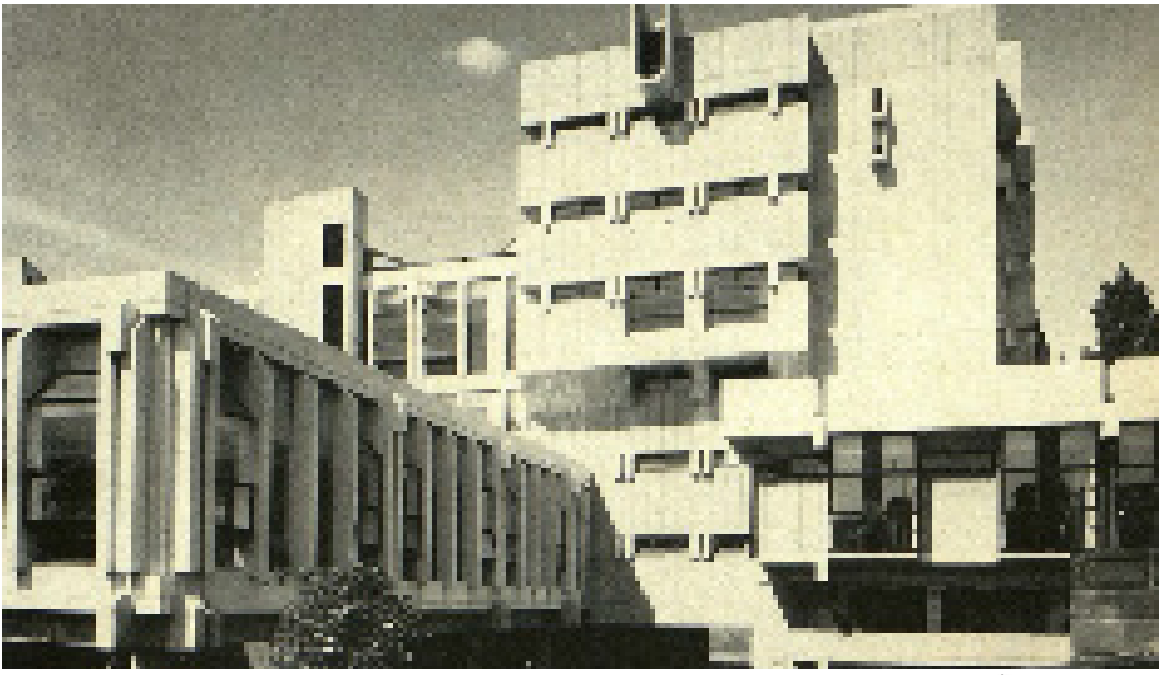


Fig 1. View of North Hayes Exchange from Central Avenue looking across the bowling green

Fig 2. Image from the Architects Journal September 26th 1973



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Eligibility Criteria	Scores
Authenticity	As appropriate for either of the following: a) Almost all original features retained- (3); or b) Most features retained- (2); or c) Some features retained- (1).
Architectural/ Artistic Interest	As specified for each of the following d) an example of a style of building that is unique to the local area or a good surviving example of an historic architectural style; (2) e) designed by notable local or national architects, engineers or designers; or an example of a particular technological innovation in building type, material or technique. (1) (maximum total = 3)
Townscape significance	As specified for each of the following f) building groups, including groups or terraces buildings, structures or features, which help form an attractive local character; (2) g) good examples of town planning layout; or notable buildings, or structures on important routes into the area, or key landmark buildings or features, which create a vista or contribute to the skyline; (1) (maximum total = 3)
Historic/ Archaeological Interest	As specified for each of the following h) strong community or socio-economic development significance, such as schools, institutions or an important part of the Borough's industrial and Military history; or (2) i) association with an important historic figure, local or national; or important local historic events; (1) (maximum total = 3)

Total score	Recommendation
10-12	Inclusion in the Local List and also recommend for Statutory Listing to English Heritage (subject to Cabinet/Member's approval)
5-9	Inclusion in Local List (subject to Cabinet/Member's approval)
0-4	Not recommended for inclusion

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Appendix 4 Consultation Responses 2 Additions to Local List of Architectural or Historic Buildings 2025.

Public Consultation Responses for the addition of 2 new entries to the Council’s Local List of Buildings of Architectural or Historic Importance. This was undertaken 1/1/2025-13/2/2025. There was a high level of interest in the consultation resulting in a substantial consultation responses for the Orchard 613 responses resulted in 593 in support and 20 against. In relation to the telephone exchange 430 responses were received 291 in support 139 against. The responses below are therefore grouped with summary of views at the beginning and then a number of longer comments added to give a general flavour of the responses received.

Summary of Consultation response.	Officer Response
The Orchard	
Positive responses.	
Local Landmark/ townscape/ conservation area importance.	Summary of comments Noted agreed in relation to the Fiveways roundabout.
Lovely/ beautiful Building	Summary of comments Noted
Important local / WW2 History and Appearance	Summary of comments Agreed.
Historical nature due to its links to WW2 through the Polish Squadrons, and an iconic building in the local history.	Summary of comments Noted
featured in a Stanley Kubrick film	Of interest but yet to find out which film.
Described in memoirs of Squadron leader Franciszek Kornicki as “The jewel of Ruislip”	Noted
This is an integral part of the progress & development of Ruislip. It represents how the 20th century changed from a destination for inner London inhabitants to enjoy country days out, to a desirable suburban area as part of Greater London. The Orchard provided a much-needed entertainment venue for service & civilian personnel from WW2 to more recent times. The preservation of the history of The Orchard is important for future generations, especially as many foreign service people left their home country, to start a new life in Ruislip. Not including The Orchard in the London Borough of	Noted.

<p>Hillingdon List would greatly diminish the cultural & historical significance of Ruislip during a period of immense change locally, to be lost forever.</p>	
<p>Historic war time use by Polish torment and should remain as a monument to their service in securing a safe Europe</p>	<p>Interesting comment but we are also aware of the locally listed war memorial adjacent.</p>
<p>I am involved with many elements remembering The Battle of Britain . I volunteer at Bentley Priory Museum, I have volunteered at RAF Uxbridge, I am a member of the Battle of Britain Historical Society and I am involved with the Battle of Britain Monument on The Embankment where I act as liaison with Westminster Council on behalf of all the Charities involved with the building and maintenance of the Monument . I have been made aware of the special relationship The Orchard has with the Polish Airmen from WW2. Unfortunately at that time the RAF didn't let the Polish Officers who were based at Northolt , use their Officers mess, so they came up the road and unwound at the Orchard. Subsequently many young women from the surrounding areas met their future Husbands there, and I have met many surviving members of those families who have come on a pilgrimage not only for the trail , but to also to see where their Mums and Dads met!</p>	<p>Interesting in relation to attitudes of the time and ongoing family tree research.</p>
<p>The Orchard Bungalow as originally named has a long history in this part of Ruislip. Its popularity begun with the introduction of Ruislip Station when tourists visited the many tea gardens in Ruislip. The gardens in the front of The Orchard are where hundreds of people used to gather.</p> <p>The Orchard Bungalow was sited in the area then known as the hamlet of King's End near the junction of Wood Lane, Sharps Lane and Ickenham Road. When it was built the only other buildings in site were the Grade 11 listed buildings at The White Bear pub opposite and Orchard Cottage (65/65A Kingsend). The development of a new road, Kings End Avenue (now Kingsend) was after the establishment of The Orchard Bungalow as houses in Kingsend started to be built in around 1910 onwards. It</p>	<p>Comment from resident association.</p>

<p>makes sense for The Orchard site to also be listed to help preserve the identity of the old hamlet in this part of Ruislip.</p> <p>The bungalow was so popular that it was extended to look as it appears today. Some alterations have been taken place, but comparison of photos taken in 1930s and more recently show that the main features of the front of the building have been preserved. By 1930s it was a popular hotel visited by people from a wide area. The Spitfire memorial associated with the whole site recognises the importance of the building as a place frequented by Polish Airman. In hindsight, the building should have been granted Local Listing Status at the same time of the Spitfire Memorial.</p>	
<p>As a local councillor, I strongly support the inclusion of The Orchard, located at Ickenham Road, Ruislip (HA4 7DW), on the Local List of Buildings of Architectural and Historic Importance. Its preservation is essential to maintaining Ruislip's unique character and heritage.</p> <p>The Orchard retains significant original features, such as its decorative timber framing, gables, and red clay tile roofing, reflecting its early 20th-century origins. These architectural elements, combined with its evolution from a tea garden to a restaurant and hotel, highlight its adaptability and value as a key historical asset.</p> <p>Prominently situated at the Roundabout, The Orchard enhances the townscape and serves as a visual anchor at the entrance to the Ruislip Village Conservation Area. Its role as a social hub, particularly during World War II when it was frequented by RAF personnel, underscores its cultural and historical significance.</p> <p>Protecting The Orchard ensures the preservation of Ruislip's rich architectural and social heritage. I urge its inclusion on the Local List to safeguard this vital piece of our community's history for future generations.</p>	<p>Comment from local councillor</p>
<p>I believe the design characteristics of the building make a significant contribution to the</p>	<p>Comment from Ward Councillor.</p>

<p>conservation area, something which LBH officers themselves have acknowledged when I have made past enquiries on the matter. Some of its features reflect its origins in the early part of the last century and it has stood the test of time in adapting to changes of use, making it a historical asset of great value and well worth preserving.</p> <p>Its prominent siting at a key route into Ruislip clearly contributes to the general comforting look and feel of the town which writers such as John Betjeman have commented on with affection.</p> <p>Additionally the connection of the building during WWII with the Polish airmen is a rich part of Ruislip's heritage. A local listing will help safeguard the building from inappropriate future development, for future generations to enjoy and appreciate.</p>	
<p>Negative Responses</p>	
<p>Site not in use/ need housing/ facilities/ better use of land. .</p>	<p>Summary of comments .Noted but local listing does not prevent change of use or other uses of building.</p>
<p>It's a pub restaurant that sadly isn't needed anymore and can no longer sustain a viable business. But the land is vast and we need housing perfect for redevelopment. I don't feel the building is of any historical interest.</p>	<p>There is pressure for housing throughout the borough but this could impact upon the character of the conservation area.</p>
<p>It should be used as a public house or hotel without the restrictions of listed status. Nobody wants to see the building empty and run down due to restrictions on the building. Ruislip desperately needs more hotel accommodation.</p>	<p>The local listing status would not restrict the use as a pub or hotel. The only consent that would be needed would be planning permission.</p>
<p>It's just a good looking large house. Nothing exceptional in its design</p>	<p>This is why it is going for local listing rather than any national recognition.</p>
<p>Hayes Telephone Exchange.</p>	
<p>Positive Responses.</p>	
<p>local History / Architecture/ landmark</p>	<p>Summary of comments Noted</p>

<p>I think it is an iconic structure. I've not seen anything quite like it anywhere & I think it looks like it had a big part to play in history. Keep the building I think it looks cool & most definitely, it's a landmark. It should be celebrated and preserved.</p>	<p>Noted</p>
<p>The building is a fine example of Brutalist architecture that is in need of protection. The building is noted in many books and on social media posts by architects and authors and should be celebrated as an important piece of architecture in the Borough.</p>	<p>Unfortunately books not mentioned but of interest as influential building.</p>
<p>Although I don't like Brutalist architecture, I recognise its contribution as architecture of its time and too much is being demolished. Good examples should be kept and maintained.</p>	<p>View expressed by number of respondents.</p>
<p>Hayes North Telephone Exchange is one of only four buildings recognised in the Architects Journal as 'the best work of the largest employer of building labour in the UK' in 1973, and is the only building featured with a full-page feature. The telephone exchange is an exemplar of public building works by the Property Services Agency (PSA; successor to the Ministry of Public Building and Works). It's notable for the involvement of George Reginald Yeats, senior PSA architect, who is best known as the senior architect for the BT Tower (1961-65).</p> <p>The U-shaped roof vents are highly-sculptural and expressive, and the strong forms and articulation of the concrete beams between the glazing is reminiscent of Paul Rudolph's Rudolph Hall (completed 1963) and Chamberlin, Powell and Bon's Grade II* Leeds University campus (1960s and 1970s). The complex massing and unashamed sculptural pre-cast concrete echoes the works of Kenzo Tange. This sensation is furthered by the oriel windows and deep soffits of the primary East Avenue elevation, stepping-up and drawing the eye with its strength.</p> <p>The articulation of the building through its varied massing, use of vertical elements, and sculptural features draw the eye; it is a positive aspect of the townscape, and a unique landmark. The retention of the original features</p>	<p>Comment from 20th Century Society (Statutory Consultee on national listed building applications.)</p>

<p>is a positive attribute that contributes to the building's significance. The telephone exchange is an example of high-quality design done by a public body, and ought to be recognised locally as such.</p>	
<p>I. Authenticity:</p> <p>Hayes North Telephone Exchange retains the majority of its original features. As most telephone exchange buildings, it has been adapted over time to suit changing telecommunications technologies, and new security or user requirements, for example by the addition of ventilation louvres or the secure fence surrounding the site's perimeter. Where new brick walls have been added at low level, an effort has been made to replicate the architectural language of the original building. Although the main entrance facing East Avenue has been fenced off, it retains original design features both internally and externally, and traces of the original landscaping remain.</p> <p>The structure remains largely unaltered, with bold pre-cast elements and a sculptural, U-shaped ventilation shaft, which caught the attention of the contemporary architectural press. An article published in the Architect's Journal in September 1973 suggested the architects had "really gone to town on their precast concrete 'language'", which still provides visual interest. The brutalist language continues internally, with a feature wall and lift shaft finished in exposed, textured concrete, and feature columns made from two separated leaves of brick mirroring the external concrete beams. Pre-cast elements were frequently used on telephone exchange buildings at the time, but Hayes North is a particularly bold example. Anecdotal evidence suggests that the exposed sections of concrete were tinted with a white dye to achieve the architects' specification of a white rather than grey finish.</p> <p>The physical separation of functions, with equipment separated from welfare facilities, is typical of the building type. At Hayes North, the functions are clearly separated into separate blocks which can be identified by the amount of</p>	<p>PhD researcher studying the architectural history of telephone exchange buildings submitted response.</p>

glazing (small windows to the apparatus rooms, larger windows to offices and welfare). Typical telephone exchange building features, including ventilation shafts and louvres, loading bays arranged vertically at multiple levels, bollards, and manhole covers are all present and retained.

II. Architectural Interest :

Hayes North Telephone Exchange was designed at a critical point in time, when the Ministry of Public Building of Works (1962-70) became the Department of the Environment (1970-1997), and the Property Services Agency (1972-1993) was set up as a government agency to 'provide, manage, maintain, and furnish the property used by the government, including defence establishments, offices, courts, research laboratories, training centres and land' by acting as an intermediary between Government Departments and the construction industry.

Although the organisation changed significantly while Hayes North Telephone Exchange was designed, the design team remained the same. The Ministry/PSA's Senior Architects George Reginal Yeats (who was also involved in designing the BT Tower) was responsible for overseeing the planning stages, while Senior Architect P. W. Manning were responsible for the construction stages. Miss B. S. Eley remained as the Ministry/PSA's project architect from start to finish. Yeats, Manning and Eley also worked on Shepherd's Bush Telephone Exchange, and Eley was involved with Burne House on Edgware Road. She is one of only four female telephone exchange designers I have identified in my PhD research.

S. G. Silhan was the PSA's Senior Structural Engineer on Hayes North. H. Fairweather & Co. was the contractor.

The Ministry's team collaborated with Gray Associates, the private (so-called 'nominated') architectural practice responsible for the design. They would likely have been involved from early design stages, but the Ministry architects usually undertook initial massing and site layout proposals to work out the size and

scope of the project before private architects were involved. They also designed extensions to Poplar Telephone Exchange and Bristol Central Telephone Exchange.

Hayes North is a fine example of a brutalist telephone exchange. It reflects the Royal Fine Arts Commissions recommended principles of telephone exchange design. Drawing on the success of the BT Tower (Post Office Tower), the RFAC suggested that where no solution other than a tall building was possible, it should not “masquerade unconvincingly as offices, but be treated as a piece of technical equipment protected by an appropriate skin” (Twenty-first Report of the Royal Fine Art Commission. 1971. London: H.M.S.O. Cmnd. 4832.). Hayes North Telephone Exchange was designed to house both telecommunications equipment and people. The functions were separated in two blocks with contrasting visual appearance, but united by consistent use of precast components, and its vital technical features celebrated in sculptural form.

III. Townscape Significance :

The Hayes North Telephone Exchange creates a focal point in the townscape, seen from across the bowling green and the Botwell Lane / Coldharbour Lane roundabout. Its architectural expression and massing contribute to its presence in the townscape. The slab and podium design helps transition to lower neighboring buildings, and the separate blocks articulate the building's different functions.

Although the main entrance area is presently fenced off, the original paving, steps and traces of landscape features remain and could be reinstated when the building security requirements permit. This would contribute positively to the streetscape and provide some physical amenity.

IV. Historic Interest:

Hayes North Telephone Exchange is an example of a successful collaboration between the Ministry/PSA and a private practice, at a critical moment of organisational restructuring at the Ministry.

When the original Circular 100 application was

<p>submitted in May 1967, the General Post Office was exempt from the usual planning and building regulations procedures due to its Crown status. However, the Post Office Act 1969 turned the GPO into a public corporation, thereafter subject to the usual requirements. Although Hayes North was exempt (presumably because the Circular 100 consent had been granted pre-1969) the building was carefully designed with a clear desire to express its technical functions in the architectural form. The contemporary press heralded it as an example of “the best work of the largest employer of building labour in the UK” (Architects’ Journal, 26 September 1973).</p> <p>Telephone exchange buildings often hold a sentimental value, with many people having either worked as a telephonist or engineer, or know someone who has. Although their daily functions have changed (and further changes imminent with the 2027 PSTN switch-off) and telephone exchange buildings are typically no longer accessible to the general public, they were once significant places of work and important community hubs. Telephone exchange buildings form a significant part of both local and national telecommunications history.</p>	
<p>Negative Responses</p>	
<p>Ugly/ eyesore/ out of character land could be better used for housing.</p>	<p>Summary of comments Noted. Opinions on the visual interest of this type of architecture will be very variable.</p>
<p>This is an ugly building without architectural merit, that detracts from its surroundings and people that have to see it. There is a tiny minority of vocal fans of brutalism who want to protect buildings like this, with no regard for their effect on the majority of people.</p>	<p>Noted</p>
<p>I don't feel it's of any real historical importance. But the land is big enough for redevelopment for housing which is desperately needed.</p>	<p>See proposed listing for interest.</p>
<p>its a different area with a different high street completely</p>	<p>Noted</p>
<p>Although has a history the building is not very aesthetically pleasing</p>	<p>Noted</p>

<p>The building is ugly. It may have merit in the minds of local residents but I am not one and don't believe it is of particular value. It is dead beat building and very ugly.</p>	<p>Noted.</p>

PUBLIC SPACES PROTECTION ORDER 2025

Cabinet Member & Portfolio	Cllr Eddie Lavery Cabinet Member for Community and Environment
Responsible Officer	Dan Kennedy – Corporate Director of Homes and Communities
Report Author & Directorate	David Holmes – Team Leader, Street Scene Enforcement Team, Homes and Communities Directorate
Papers with report	Appendix 1 – Public Spaces Protection Order 2025 Appendix 2 – Equalities Impact Assessment

HEADLINES

Summary	<p>Following Cabinet’s approval of the draft Public Spaces Protection Order (PSPO) for public consultation on 9th January 2025, this report presents the results of the public consultation.</p> <p>The findings from the consultation were in support of the proposals. The report, therefore, makes recommendations for the continuing and revised restrictions on the anti-social use of alcohol and drugs, the anti-social use of vehicles and general acts of anti-social behaviour, as well as control measures for dogs, birds and vermin with specific measures for areas within the borough’s green spaces and town centres, to prevent nuisance and to reduce the detriment to the quality of life of local residents.</p>
<p>Putting our Residents First</p> <p>Delivering on the Council Strategy 2022-2026</p>	<p>This report supports our ambition for residents / the Council of: Be / feel safe from harm</p> <p>This report supports our commitments to residents of: Safe and Strong Communities</p>
Financial Cost	A revenue neutral impact is anticipated from the recommendations within this report. Enforcement of the PSPO will be covered by the existing on-street enforcement contract arrangements. Existing resources will be redeployed to any affected areas and signage and publicity of the revised PSPO will be met from existing resources.
Select Committee	Residents’ Services
Ward(s)	All

RECOMMENDATIONS

That the Cabinet:

- 1) **Considers the public consultation responses and summary information on the draft PSPO.**
- 2) **Has regard to the contents of the Equalities Impact Assessment.**
- 3) **Formally withdraw Public Spaces Protection Order 2023 effective 1st May 2025 before its expiry in 2026; and**
- 4) **Approve the finalised Public Spaces Protection Order 2025 in Appendix 1 for publication and implementation on 1st May 2025 for a period of 3 years.**

Reasons for recommendation(s)

The Public Spaces Protection Order 2025 identifies specific unreasonable and persistent behaviours that have been found to have had a detrimental effect on residents, visitors and the community. In considering the scope of the Order, information was drawn from internal and external stakeholders and data. The draft revised PSPO was the subject of public consultation between 20th January 2025 and 2nd March 2025. A total of 87 responses were received from residents, businesses and students. Official responses were received from The Hayes Town Partnership and the Uxbridge Business Improvement District.

An Equalities Impact Assessment was conducted during which consideration was given to specific groups within the community on grounds of race, religion, sex and culture. Targeted engagement has followed to ensure a raising of awareness of the proposed PSPO and to provide an opportunity to comment.

It is recommended that the Council approves the introduction of the revised PSPO from 1st May 2025 and withdraw PSPO 2023 at the same time.

Alternative options considered / risk management

Alternative options for the Council's officers to manage anti-social behaviour in public spaces are limited by the available enforcement legislation. Police officers have additional legislative powers to manage criminal activities and offences, however, their resources are limited and unable to effectively tackle the types of anti-social behaviour addressed in the proposed PSPO.

The Council must consider the impact a PSPO may have on the vulnerable, homeless and rough sleepers and should ensure that it is not aimed at these groups of people but at limiting specific harmful activity and behaviour.

An interested person can challenge the introduction of a PSPO in the High Court within six weeks of its adoption. It may also be challenged by judicial review on public law grounds within three months of the decision to implement.

Democratic compliance / previous authority

Cabinet authority is required to approve a Public Spaces Protection Order before it can be implemented.

Select Committee comments

None at this stage.

SUPPORTING INFORMATION

Legislative Background

1. The Anti-Social Behaviour Crime and Policing Act 2014 provides the legal framework to implement PSPOs. Orders may be introduced in a specific administrative area where the Council is satisfied that certain conditions have been met. These conditions focus on the behaviours which the Council is seeking to address which:
 - (a) have a detrimental effect or are likely to have a detrimental effect on the quality of life in a locality;
 - (b) the effect or likely effect of is or is likely to be persistent or continuing or is likely to be unreasonable; and
 - (c) are justified to be subject to the restrictions in the PSPO.
2. The Home Office published statutory guidance in July 2014 to support the effective use of new powers to tackle anti-social behaviour introduced through the Anti-Social Behaviour, Crime and Policing Act 2014. The powers introduced by the 2014 Act were deliberately local in nature.
3. As a public authority, the Council needs to ensure that all its strategies, policies, services and functions, both current and proposed, have considered human rights, equality, diversity, cohesion and integration. An Equality and Human Rights Impact Assessment (EHRIA) before the introduction of a PSPO can help to inform how best to balance the interests of different parts of the community and provides evidence as to whether the restrictions being proposed are justified, as required by section 59 of the 2014 Act. The Equalities and Human Rights ImHRIA for this proposed new PSPO is attached at Appendix 2.

Purpose

4. Public Spaces Protection Orders (PSPOs) are intended to deal with nuisance or problems that are detrimental to the local community's quality of life and work by imposing conditions on the use of the area; enabling residents and visitors to use and enjoy public spaces, safe from anti-social behaviour. The PSPO provides local authorities with the necessary powers to enforce those restrictions and prohibitions within the designated area, where evidential tests are satisfied.

5. The restrictions and prohibitions in the PSPO apply to everyone within the designated area, however, they may have an increased negative impact on groups depending on the nature of the prohibitions.
6. Whilst designed to prohibit certain activities, the PSPO is also intended to enable people to feel Hillingdon is a safe and welcoming place for all.
7. A council can implement a PSPO on any public space within its own area. The definition of a public space is wide and may include any place to which the public has access as of right or by permission.
8. Police, council officers and officers authorised by the Council can enforce the conditions of PSPOs and may issue fixed penalty notices for non-compliance. Failure to comply with a PSPO is an offence which could result in a fine of up to £1,000 in a magistrates' court.
9. PSPOs are regularly reviewed in terms of reported breaches and enforcement undertaken and they can be discharged/lapse, or the conditions can be varied. Discharging a PSPO must be undertaken when the PSPO becomes unnecessary due to the issue that justified the PSPO having ceased.

Further Considerations

10. The proposed PSPO is to form part of controls in place which are intended to minimise the impact of anti-social behaviour on residents. Specific measures are already in place to tackle parking around Heathrow Airport and joint working is undertaken with interested parties and partner agencies to prevent retail crime, nighttime economy risks and anti-social behaviour in communal areas and green spaces within the Borough.
11. On consideration of a PSPO and its content, a balance is sought between including items that people identify as making them feel safer, whilst at the same time not making unnecessary restrictions on the enjoyment of others or introducing rules and regulations that cannot be enforced. Figures from August 2023 to October 2024 indicate that 5017 breaches of the current PSPO were detected and challenged by enforcement services. These are punishable with a fixed penalty of £100 or a maximum penalty of £1,000 at court and provides a deterrent to future potential offending behaviour.

Financial Implications

Implementation of the recommendations in the report, introducing a revised Public Spaces Protection Order to tackle various social problems, should result in a revenue neutral impact.

The cost of the Council's enforcement contractors continues to be funded from income generated via the issue of Fixed Penalty Notices. The income from additional fines from PSPO work mentioned in the report should offset any additional cost of enforcement.

The anticipated total cost of Environment Enforcement Officers (EEOs) in 2024/25 is £452,000, whilst current run rates for forecast income in 2024/25 estimates around £470,000 from the generation of penalty income receipts. Any impact on costs and income generated via the issue

of fines will be reported as part of the budget monitoring cycle and subsequently considered via the next refresh of the Council's MTFS planning process.

RESIDENT BENEFIT & CONSULTATION

Impact and/or benefits to residents, services users and communities

The Public Spaces Protection Order (PSPO) for Council public spaces is in line with the Council's corporate strategy priorities to support communities, to protect the built environment, parks and open spaces and to take action to protect residents and environment against issues of environmental crime and anti-social behaviour, which includes matters that cause harassment, annoyance or nuisance.

The Council is aware that the majority of those who live, work and visit the borough keep the area clean and safe. However, it wants to ensure where this is not the case that it uses the relevant legislation and approaches to maintain a clean and safe environment. The PSPO places restrictions and requirements on people using the defined areas.

The prohibitions contained within the PSPO were identified from an evidence base including service requests from residents and complaints made to Elected Members about issues which have a detrimental effect on the safety of residents and the wider public. The continuation of a tailored and effective PSPO within the borough is targeted at:

- Reducing alcohol and drug abuse.
- Promoting safe use of the highway and footways.
- Ensuring control over dogs, birds and vermin.
- Protecting residents against abuse and anti-social behaviours such as urination and defecation in public places and spitting in the street.
- Unauthorised use of public spaces.
- Controlling trading within the town centres.

The prohibitions are intended to have significant benefits for residents and others, living, working and visiting the Borough. The PSPO will assist in the prevention of an area being misused and provide immediate relief to residents where anti-social behaviour does occur, improving their safety and quality of life. It will also deter people from participating in or organising gatherings which cause severe nuisance and anti-social behaviour, increasing the fear of crime and perception of safety within the community.

Consultation & Engagement

The Anti-Social Behaviour, Crime and Policing Act 2014 requires local authorities to consult with the public and statutory bodies prior to implementing such a PSPO. This allows this authority to demonstrate the reasons for considering such action and consider the views of residents and interested parties.

The consultation on the proposed new PSPO took place between 20th January 2025 and 2nd March 2025. It included questions related to residents' support, or not, of the proposed measures

and requested alternative conditions for consideration. Opinion was tested on the proposals relating to specific geographic areas.

Full details of the public consultation and individual responses can be found in the Background Papers for review.

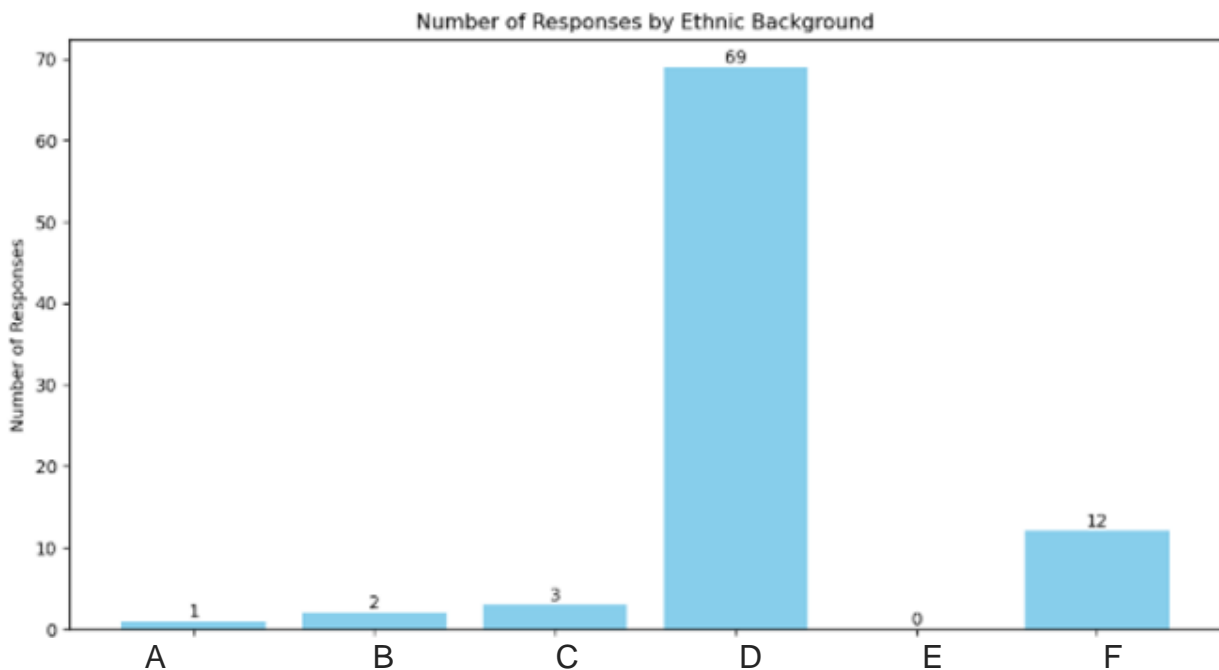
The full survey was publicised on Hillingdon Council website throughout the consultation period, promoted through Council social media channels and direct engagement with specific groups/organisations, including:

- Trade & Community Interest Groups
- Church Groups
- Ward Councillors
- Residents Associations
- Charities
- Bordering Local authorities
- Kennel Club
- London Heathrow Airport
- Internal Council Departments

A summary of the main points relating to the consultation responses follows.

Demographic Profile of Respondents

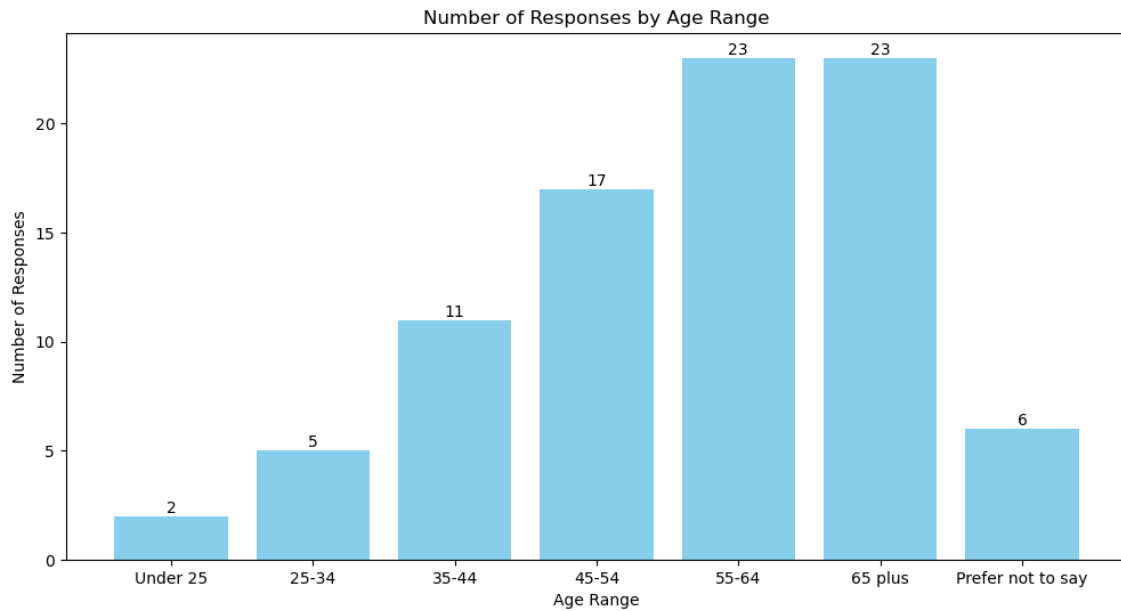
Ethnic Background



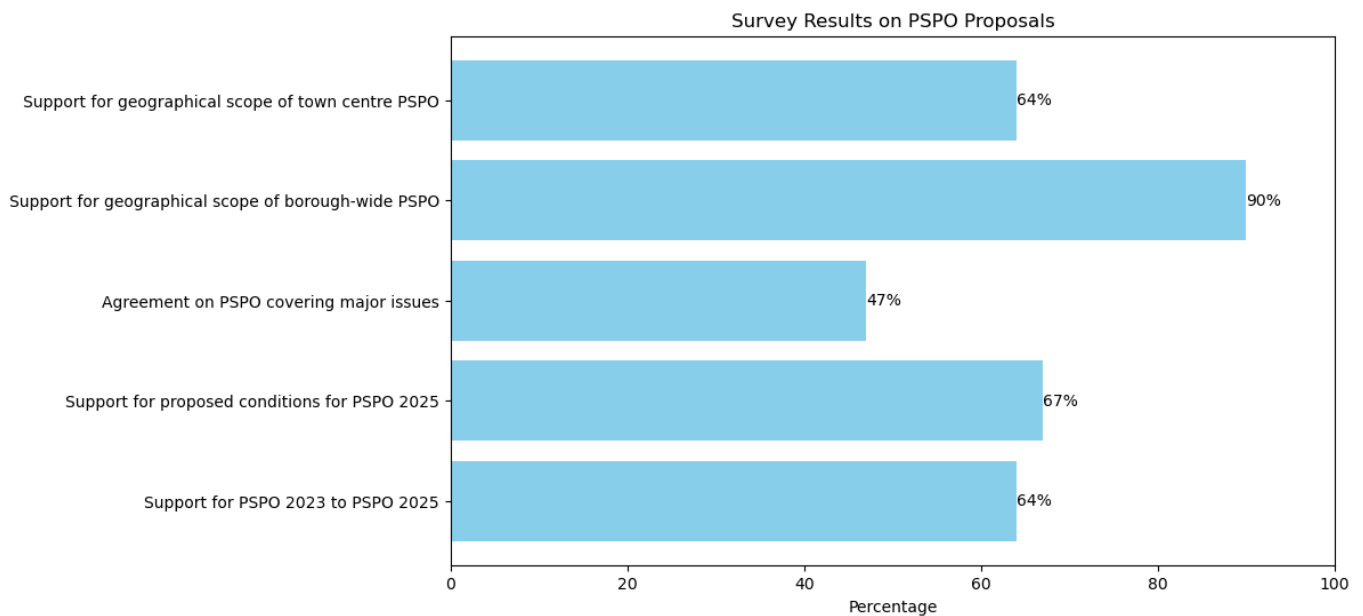
- A- Asian or Asian British ethnic group
- B- Black, Black British, Caribbean, or Africa
- C- Mixed or multiple ethnic group

- D- White group or background
- E- Other ethnic group or background
- F- Prefer not to say

Age range



Overall Survey Response

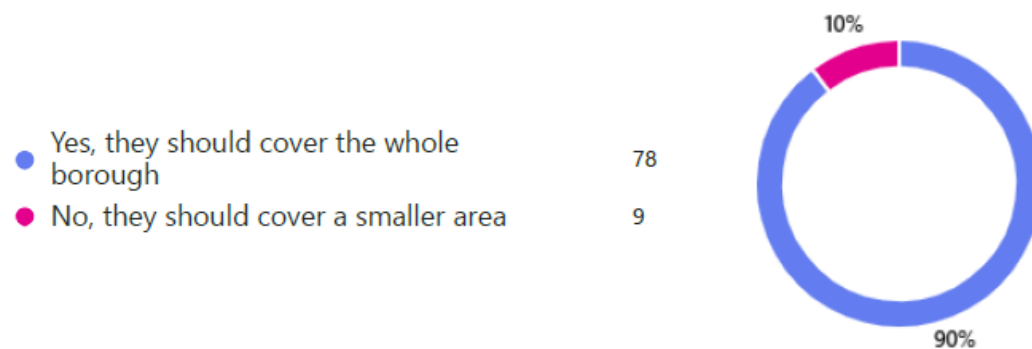


Detail of Overall Survey Response

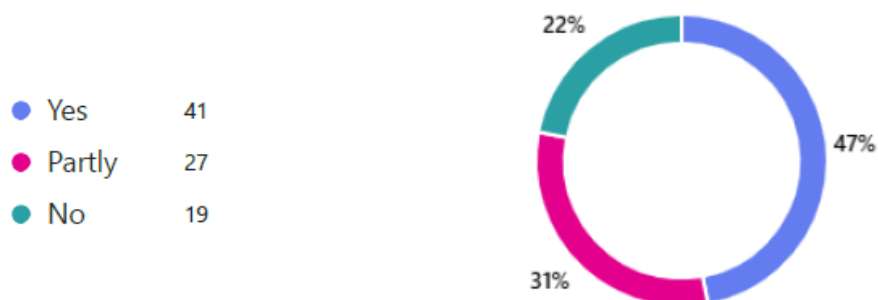
Do you support the geographical scope of the proposed town centre PSP O conditions?



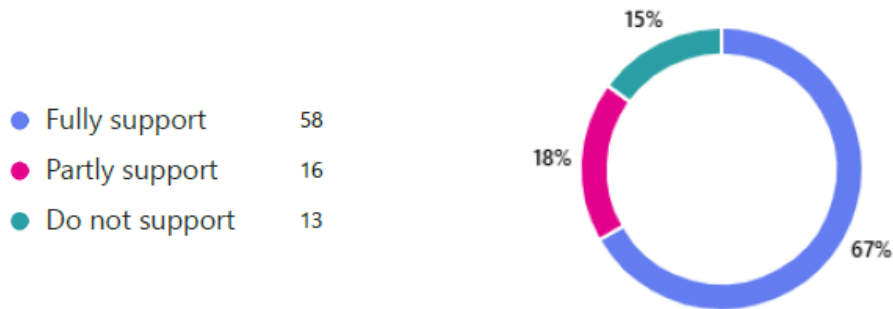
Do you support the geographical scope of the proposed borough-wide P SPO conditions?



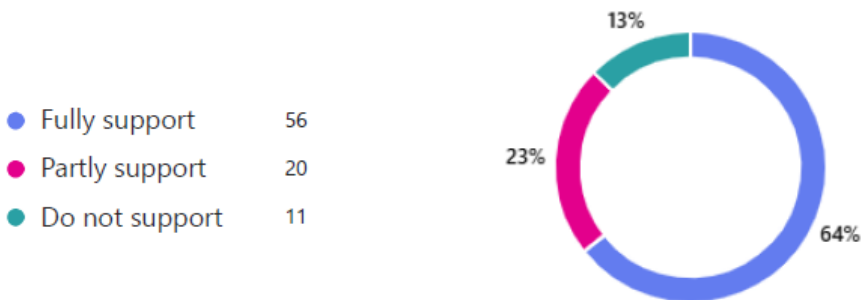
Do you feel the proposed PSPO covers the major issues in your area?



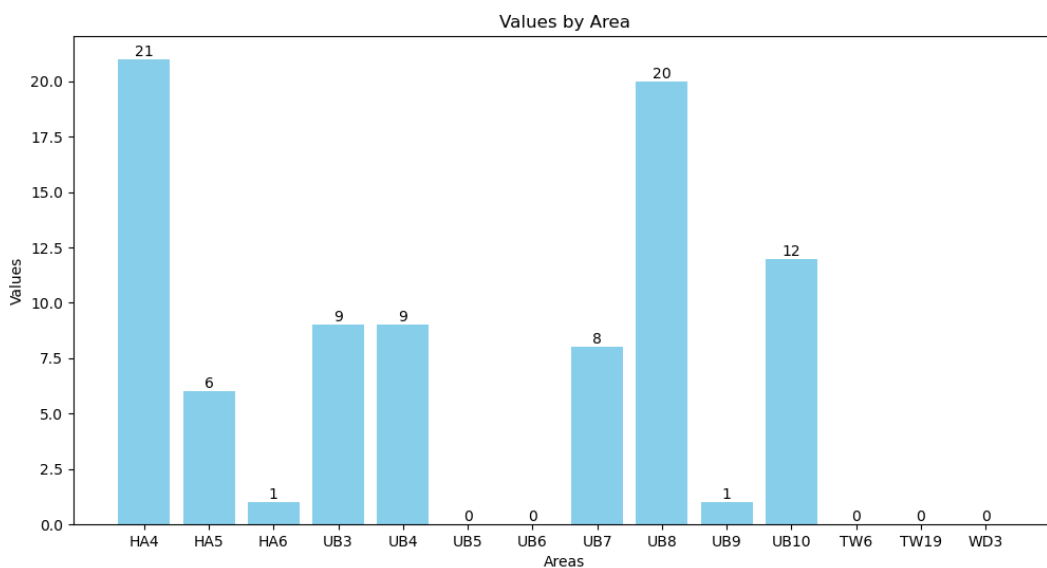
Do you support the proposed conditions?



Do you support the proposal to discharge PSPO 2023 and introduce PSPO 2025?



Geographical Profile of Respondents



Representation

- **Ethnic Diversity:** Consultation responses are predominantly from individuals with a White background (79.31%). Views and experiences of other ethnic groups may be underrepresented.
- **Age Representation:** The highest number of responses comes from the 55 plus age range, indicating that older individuals are more engaged or more likely to respond to the survey. This could mean that the perspectives of younger age groups are underrepresented.
- **Area-Specific Issues:** The highest level of responses were from HA4 and UB8 areas, suggesting that these areas may have specific issues, or a higher level of engagement compared to others.

Enforcement and Clarity

Some respondents highlighted the need for a clear enforcement strategy, including patrol schedules, resource allocation, and monitoring. There were requests for clearer definitions and explanations of certain conditions, such as the prohibition of idling engines and the use of motorised vehicles in green spaces.

Community Engagement

Some respondents emphasised the importance of engaging residents in the development and implementation of the PSPO, ensuring their concerns are addressed.

There were calls for a balanced approach that supports vulnerable individuals, such as the homeless, rather than enforcement.

Key Issues Identified

The Metropolitan Police raised concerns linked to the use of e-scooters, and the status of e-bikes as bicycles not vehicles, and the use of both conveyances in the commission of crime within Hillingdon Borough. The Police requested e- bikes and e- scooters are specifically identified, referred to, and restricted within the PSPO conditions. This issue was also highlighted in consultation responses from residents.

The current condition 2(a) within the draft PSPO 2025 states:

A person commits an offence if without reasonable excuse, they drive a motorised, electric or powered vehicle over any footway, footpath, grass verge adjacent to any part of the public highway or within the Councils Green Spaces. (This prohibition does not apply to those persons using mobility vehicles).

Following a European Court of Justice's landmark ruling in 2023, stating pedal-assist electric bicycles are bicycles and not motorcycles or motor vehicles and in response to the public consultation, condition 2(a) PSPO 2025 has been amended to reflect the legal definition:

A person commits an offence if without reasonable excuse, they use an electric powered e-scooter or e-bicycle, motorised or powered vehicle, to drive over any footway, footpath, grass verge adjacent to any part of the public highway, or within the Councils Green Spaces. (This prohibition does not apply to those persons using mobility vehicles or motorised wheelchairs).

Condition 2(b) related to 'idling' of motor vehicles and what constitutes the offence, was considered ambiguous. There has been an increase in challenges to FPNs issued for a breach of this condition, related to the legality and confusion of the language used. In response and to ensure clarity, condition 2(b) has been amended:

Original draft

A person commits an offence if without reasonable excuse, they leave a parked or stationary vehicle engine running on any part of the public highway.

Amended

A person commits an offence if without reasonable excuse they allow any vehicle in their charge, to idle unnecessarily when parked, whether attended or otherwise, on any part of the public highway unless as part of an official examination or assessment by a mechanic.

General issues of ASB raised within the consultation, such as fly tipping, littering, are noted as matters of concern for residents. These areas are not covered by the PSPO as they are enforceable under primary specific legislation independent of a PSPO.

Official responses received from the Hayes Town Partnership and Uxbridge Business Improvement District (BID) identified a link with anti-social behaviour and access ways or alleyways. It was confirmed with the partnership that such public areas are generally covered by the PSPO, although it should be noted this must be confirmed on each occasion. Issues were raised related to realistic enforcement, why bird feeding applied to green spaces and how the PSPO fits with agreements already in place within the town centre.

Key resident comments

- *I feel there has been things left out that need to be addressed. Not prohibiting motorbikes and quad bike use for one.*
- *It's not so much lack of support for any of the content but rather the omission of any specific mention of trying to control the use of illegal eBikes which I would like to see the Council do more to prevent.*
- *The updated PSPO includes necessary restrictions, such as:
Banning illegal car meets and street racing – This is essential for areas like Uxbridge Road and The Parkway in Hayes.*
- *Expanding ASB prohibitions (e.g., aggressive begging, street drinking, and vandalism) – These are persistent issues in Hayes Town Centre.*

Response to Key Resident Comments

The use of motorbikes, quad bikes, e-bikes, e-scooters and vehicles at car meets has been considered within the PSPO 2025. Restrictions are in place on highways and within the Council's green spaces. Car meets have also been considered with restrictions around participation, promoting, organising or publicising such an event.

Restrictions are included in the proposed PSPO relating to the activities of begging and street drinking involving open or closed containers of alcohol and being verbally abusive or presenting behaviour likely to cause harassment, alarm or distress, including whilst begging. Vandalism is a separate matter and can be dealt with under specific legislation.

Consultation Conclusion

The consultation responses support the discharge of PSPO 2023 and the introduction of PSPO 2025. Some matters raised are not a question for the implementation of the PSPO but for its strategic application and enforcement.

A response has been included within this Cabinet paper to the comments relating to the subjects of e-bicycles, e-scooters, vehicles and idling. This is in reply to the concerns of both to the public and the Police expressed during the consultation.

The geographical areas covered by the PSPO have been identified by information of offending behaviour at the time of consideration. These areas do change and have been reviewed at this stage and will be subject to further review if necessary.

Other specific issues that were raised in the consultation have been covered within the PSPO, and other matters can be covered by primary legislation in use by the Council.

In considering the PSPO 2025, an opportunity to comment has been provided through general consultation along with a direct approach to statutory bodies and specific groups/organisations. An Equalities Impact Assessment has been completed. The combined result is believed to offer a balanced approach that supports any vulnerable individuals whilst providing protection to residents, visitors and businesses against elements of anti-social behaviour present in society.

CORPORATE CONSIDERATIONS

Corporate Finance

Corporate Finance have reviewed this report and concurs with the Financial Implications set out above, noting the recommendation to approve the finalised Public Spaces Protection Order 2025, with the implementation forecast to be revenue neutral within the Council's budget and therefore in line with the budget strategy approved by Cabinet and Council in February 2025.

Legal

There is no known legal impediment to the proposed actions. Although the proposals have been scrutinised to ensure legal compliance, it should be noted that this is a developing area of law. PSPOs can be challenged, and several have been successfully contested.

As explained in the report, the Council's powers in relation to PSPOs are derived from the Anti-Social Behaviour, Crime and Policing Act 2014.

This report recommends that, having regard to the consultation and equalities impact assessment, the current PSPO 2023 be discharged (which would otherwise lapse 3 years after it was made) and that PSPO 2025 be introduced for a period of 3 years with effect from 1st May 2025. The power to make a PSPO is under section 59 of the Anti-Social Behaviour, Crime and Policing Act 2014 whilst the power to discharge a PSPO is under section 61.

Under section 59, the Council can make a PSPO if satisfied on reasonable grounds that two conditions are met. The first condition is that:

- (a) activities carried on in a public place within the Council's area have had a detrimental effect on the quality of life of those in the locality; or
- (b) it is likely that activities will be carried on in a public place within that area and that they will have such an effect.

The second condition is that the effect, or likely effect, of the activities:

- (a) is, or is likely to be, of a persistent or continuing nature;
- (b) is, or is likely to be, such as to make the activities unreasonable; and
- (c) justifies the restrictions imposed by the PSPO.

The Council can only impose conditions that are reasonable to impose in order to:

- (a) prevent the detrimental effect from continuing, occurring or recurring; or
- (b) reduce that detrimental effect or to reduce the risk of its continuance, occurrence or recurrence.

The above criteria create an evidential basis. The Council must satisfy itself based on data, reports, complaints, consultation responses, and any other evidence that the PSPO conditions are justified and proportionate in the circumstances.

Also, in deciding whether to exercise either of the powers to make (and, if so, how so) or discharge a PSPO, section 72 of the Anti-Social Behaviour, Crime and Policing Act 2014 requires the Council to have particular regard to the article 10 (right to freedom of expression) and article 11 (right to freedom of assembly) of the European Convention on Human Rights. This has been incorporated into the equalities impact assessment, which has also been completed in consideration of the Council's public sector equality duty under section 149 of the Equality Act 2010. Where a PSPO restricts Convention rights and freedoms, those restrictions are permissible if lawful, necessary and proportionate. The Council should also bear in mind human rights and equalities considerations in the way that the PSPO is enforced in practice.

Section 72 of the Anti-Social Behaviour, Crime and Policing Act 2014 also specifies the necessary consultation and necessary publicity the Council must undertake when making a PSPO and when discharging a PSPO. The necessary consultation includes consulting with:

- (a) the chief officer of police, and the local policing body, for the police area that includes the restricted area;
- (b) whatever community representatives the Council thinks it appropriate to consult; and
- (c) the owner or occupier of land within the restricted area.

The necessary publicity for making a PSPO is publication of the proposed PSPO whilst the necessary publicity for discharge is publicising the proposal, which was done as part of the consultation. If the decision is now made to discharge PSPO 2023 and introduce PSPO 2025, the Council must, in accordance with regulations 2-3 of the Anti-Social Behaviour, Crime and Policing Act 2014 (Publication of Public Spaces Protection Orders) Regulations 2014, publish a notice on its website regarding the discharge, publish PSPO 2025 as made on its website, and erect physical notices in affected public places regarding PSPO 2023 discharge and PSPO 2025 being made.

Any consultation that the Council undertakes must also adhere to the legal standard of fairness and adequacy, as underpinned by the *Gunning* principles:

- (a) Consultations must occur while proposals are still at a formative stage
- (b) Sufficient information needs to be supplied for the public to give the consultation 'intelligent consideration'
- (c) There needs to be an adequate time for the consultees to consider the proposal and respond
- (d) Conscientious consideration must be given to the consultation responses before decisions are made

Crucially, the product of the consultation must be conscientiously considered by the decision-maker in finalising any decision to discharge PSPO 2023 and introduce PSPO 2025.

BACKGROUND PAPERS

- [Full Consultation Summary and Responses](#)
- [Anti-social Behaviour, Crime and Policing Act 2014](#)
- [Home Office Guidance for Frontline Professionals – Anti-social Behaviour Powers June 2022](#)
- [Local Government Association PSPO Guidance for Councils](#)
- [Cabinet decision / report on 2023 PSPOs – 27 July 2023](#)



HILLINGDON

LONDON

Appendix 1 - LONDON BOROUGH OF HILLINGDON (BOROUGH WIDE AND TOWN CENTRES) PUBLIC SPACES PROTECTION ORDER 2025 (“THE ORDER”)

Anti-Social Behaviour, Crime and Policing Act 2014 (“the 2014 Act”), section 59

A) RECITALS

1. The London Borough of Hillingdon (“**the Council**”) makes the Order under section 59 of the 2014 Act and is satisfied that the applicable requirements set out in Chapter 2 of the 2014 Act have been met and that it is, in all the circumstances, appropriate to make the Order.
2. The land edged in black in Schedule 1 to the Order (“**the Borough Wide Restricted Area**”) and the land edged in red in Schedule 2 to this Order (“**the Town Centres Restricted Area**”), collectively “**the Restricted Areas**”, is land in the administrative area of the Council to which the 2014 Act applies and is identified as being protected by the making of the Order.
3. The Council, in accordance with section 59(7)(a) of the 2014 Act, identifies the activities prohibited or otherwise controlled or restricted by the conditions set out in the Order as being activities that the Council is satisfied meet the condition set out in section 59(2) of the 2014 Act, namely that:
 - (a) they are carried on in a public place within the Restricted Areas and have had a detrimental effect on the quality of life of those in the locality, or
 - (b) it is likely that they will be carried out in a public place within the Restricted Areas and that they will have such an effect.
4. Based on reports of these activities, the Council is also satisfied that the condition set out in section 59(3) of the 2014 Act has been met, namely that the effect, or likely effect, of the activities:
 - (a) is, or is likely to be, of a persistent or continuing nature,
 - (b) is, or likely to be such as to make them unreasonable, and
 - (c) justifies the prohibitions and required imposed by the Order.

5. The Council is further satisfied that the prohibitions and requirements imposed by the Order are ones that are reasonable to impose in order to:
 - (a) prevent the detrimental effect of the activities from continuing, occurring or recurring, or
 - (b) reduce that detrimental effect of the activities or to reduce the risk of its continuance, occurrence or recurrence.
6. The Council has had regard to the rights and freedoms set out in the Convention for the Protection of Human Rights and Fundamental Freedoms 1950, in particular to article 10 (right of freedom of expression) and article 11 (right of freedom of assembly), and has concluded that, in so far as the Order restricts such rights and freedoms, those restrictions are lawful, necessary and proportionate.

B) CITATION

The Order may be cited as London Borough of Hillingdon (Borough Wide and Town Centres) Public Protection Order 2025.

C) COMMENCEMENT AND DURATION

The Order shall come into force on **1st May 2025** for a duration of 3 years from that date, subject to any extension, variation or discharge by the Council pursuant to its statutory powers.

D) INTERPRETATION

1. For the purposes of the Order:

“alcohol” has the meaning given by section 191 of the Licensing Act 2003.

“authorisation” means a relevant, valid and demonstrable highway event permit, premises licence, temporary event notice, street trading licence, green spaces lease agreement, busking permit, leaflet distribution permit or other written permission or consent from the Council approved in advance; any authorisation relied upon must be made available on request by an authorised officer.

“authorised officer” means an employee of the Council, a police officer, police community support officer, or any other person designated by the Council to enforce the Order.

“car meet” means 2 or more vehicles (which may include motorbikes) being on a highway, or a publicly accessible place, where any such vehicle, or occupant of a vehicle, performs any of the activities listed below:

- i. speeding

- ii. driving in convoy
- iii. racing
- iv. performing stunts (including but not limited to doughnuts, drifting, skidding, handbrake turns, and wheel spinning)
- v. sounding horns or playing music so as to cause nuisance
- vi. revving of engines so as to cause nuisance
- vii. using foul or abusive language
- viii. using threatening, intimidating behaviour towards another person
- ix. causing obstruction on a public highway or in a publicly accessible place, whether moving or stationary

“controlled drug” has the meaning given by section 2 of the Misuse of Drugs Act 1971.

“dog faeces receptacle” includes a receptacle which is provided for the purpose of the disposal of waste.

“food source” means any substance containing nutrients, such as carbohydrates, proteins and fats, that can be ingested by a living organism and metabolised into energy and body tissue.

“park” means any park or and open space that is managed, owned or under the control of the Council.

“product” means any article or substance that is manufactured or refined for sale.

“psychoactive substance” has the meaning given by section 2 of the Psychoactive Substances Act 2016.

“public place” means any place to which the public or any section of the public has access, on payment or otherwise, as of right or by virtue of express or implied permission.

2. A reference to a statute or statutory provision is a reference to it as amended, extended or re-enacted from time to time.

E) BOROUGH WIDE CONDITIONS

The effect of the Order is to impose the prohibitions and requirements in this Part E within all public places and housing communal areas within the Borough Wide Restricted Area (as shown edged in Schedule 1) at all times.

1. Alcohol and Drugs

- (a) A person commits an offence if without reasonable excuse they are in possession of an open container of alcohol and/or are consuming alcohol (other than in premises licensed for the sale of alcohol or at a venue where a Temporary Event Notice is in place) after having been required to stop by an authorised person.
- (b) A person commits an offence if without reasonable excuse they fail to hand over immediately any alcohol, whether in an open or closed container, when required to do so by an authorised person who believes that the person has consumed, is consuming or intends to consume alcohol in breach of the prohibition 1 (a) above.
- (c) A person commits an offence if without reasonable excuse they are under the influence of controlled drugs and/or other psychoactive substance.

Penalties - In the restricted areas any person who continues drinking alcohol having been required to desist by an authorised officer under condition (a) above or fails to hand over any alcohol in his or her possession when required to do so by an authorised officer under condition (b) a above commits an offence under section 63 and is liable on summary conviction to a fine not exceeding level 2 on the standard scale or fixed penalty notice of a maximum £100.

2. Vehicles

- (a) A person commits an offence if without reasonable excuse, they use an electric powered e-scooter or e-bicycle, motorised, or powered vehicle to drive over any footway, footpath, grass verge adjacent to any part of the public highway, or within the Councils Green Spaces. (This prohibition does not apply to those persons using mobility vehicles or powered wheelchairs).
- (b) A person commits an offence if without reasonable excuse they allow any vehicle in their charge, to idle unnecessarily when parked, whether attended or otherwise, on any part of the public highway, unless as part of an official examination or assessment by a mechanic.
- (c) A person commits an offence if they use remote controlled model vehicles or aircraft that is likely to cause nuisance from noise or cause harassment, alarm, or distress to another person.
- (d) A person commits an offence if they use drones or small unmanned aircraft (SUA) of any mass without the express consent of the Council.

Penalties – A person who is guilty of an offence under this part of the order shall be liable on summary conviction to a fine not exceeding level 3 on the standard scale.

3. Car Meets

- (a) No person shall participate in a car meet as a driver or passenger being carried in or on a motor vehicle.
- (b) No person shall congregate to spectate a car meet.
- (c) No person shall use any water outlet for the purpose of flooding the road to facilitate performance of stunts at a car meet.
- (d) No person shall promote, organise or publicise a car meet (including but not limited to via email, the internet, social media, or any publication or broadcast medium).

4. Urinating, Defecating and Spitting

No person shall urinate, defecate, or spit except in a premises or receptacle designed for that purpose.

5. Dogs, birds and vermin

- (a) A person commits an offence if they are in sole charge of more than four dogs in a public place within the administrative area of the London Borough of Hillingdon (The 'Restricted Area') without a licence.
- (b) Where a valid licence is in force, a person commits an offence if they are in sole charge of more than six dogs in a public place within the administrative area of the London Borough of Hillingdon (The 'Restricted Area').
- (c) A person commits an offence if, without reasonable excuse, any dog in their charge defecates on land within the 'restricted area' and they fail to remove the faeces and deposit it in a dog faeces receptacle, forthwith.
- (d) A person commits an offence if they fail to place a lead on a dog (which at the time the person is in charge of or responsible for) when the dog is on a pavement by a road (within 3 metres of a carriageway) or when required to do so by an authorised officer.
- (e) A person commits an offence if they place or distribute of any type of food source in a street or Green Space to either feed or attract birds or vermin.

Penalties – A person who is guilty of an offence under this part of the order shall be liable on summary conviction to a fine not exceeding level 3 on the standard scale.

Notes relating to condition (C) - placing faeces in a receptacle on the land which is provided for the purpose or for the disposal of waste, shall be sufficient removal from the land under requirement (C) above; being unaware of the defecation or not having a device for or other suitable means of removing the faeces shall not be a reasonable

excuse for failing to remove the faeces; this requirement does not apply if the person is a registered assistance dog owner.

5.1. Exempted persons

The following are exempt from conditions 5(c) to 5(e) above:

- i. any person with a disability within the meaning of the Equality Act 2010 whose disability affects their mobility, manual dexterity, physical coordination, ability to lift, carry or move everyday objects, or otherwise comply with the condition where they are in charge of a dog upon which they rely for assistance
- ii. any person who is in charge of an assistance dog trained by a relevant charity
- iii. any person who has been given permission by the owner, occupier or person or authority in charge of the relevant land not to comply with the condition on that land
- iv. the police, emergency services or other agencies permitted by the Council using a dog for official purposes

6. **General Prohibitions**

- (a) A person commits an offence if they encamp (with or without a vehicle) without the express consent of the Council.
- (b) A person commits an offence if they are being verbally abusive to any person or using foul language or behaving in a way which causes or is likely to cause harassment, alarm or distress to another person.
- (c) A person commits an offence if they are engaged in the act of begging for food or money that causes harassment, alarm, or distress to another person

7. **Obstruction of an Authorised Officer**

- (a) Any person who attempts to obstruct an Authorised Officer in carrying out their duties under this Public Spaces Protection Order shall commit an offence.
- (b) Obstruction includes, but is not limited to, giving false information, physically obstructing an Authorised Officer, and refusing to comply with any reasonable instruction given to ensure compliance with this PSPO.

F. PARKS AND OPEN SPACES CONDITIONS

The effect of the Order is to impose the prohibitions and requirements in this Part F within all Green Spaces and Parks within the Borough Wide Restricted Area (as shown in Schedule 1) at all times.

- (a) A person commits an offence if they light or are in control of or responsible for activity involving a fire, barbecue, or fireworks without the express consent of the Council.
- (b) A person commits an offence if they use any device designed or adapted for detecting or locating any metal or mineral on or in the ground without the express consent of the Council.
- (c) A person commits an offence if they smoke any substance including cigarettes, cigars, electronic cigarettes (vapes), herbal cigarettes or similar within the boundary of a children's play area.
- (d) A person commits an offence if they engage in any type of fishing or dredge or remove any material from any park or open space without the express consent of the Council.
- (e) A person commits an offence if they do not leave a park at the designated closing time or when required to do so by an authorised officer.
- (f) A person commits an offence if they do not extinguish a fire and/or barbecue or firework (if appropriate and safe to do so), removing all waste and/or associated items for safe disposal
- (g) A person commits an offence if they fail to ensure that any dog (which at the time the person is in charge of or responsible for) having entered a children's play area, leaves that play area forthwith
- (h) No person shall use a microphone, loudspeaker, megaphone, loud hailer or any other similar equipment designed to amplify the volume of speech or music unless authorised by the council.
- (i) No person shall use mains electricity or generator power for the purposes of amplification unless authorised as above.

G. TOWN CENTRE CONDITIONS

The effect of the Order is to impose the prohibitions and requirements in this Part G within all public places in the Uxbridge, Hayes and Ruislip Town Centres Restricted Area (as shown edged in Schedule 2) at all times:

1. Financial Agreements in the Street

Any person involved in stopping people for the purpose of encouraging them to enter into financial agreements for charitable or other purposes must only operate from a stand and may only approach people a maximum of 2 metres from the stand.

2. Street Trading

No person shall sell any product or item, including but not limited to from bags, trolleys, or other mobile means, in outdoor public places without authorisation.

3. Distribution of printed matter

No person shall distribute any free printed matter without Council authorisation unless they are distributing the matter by, or on behalf of a charity and it relates to or is intended for the benefit of a charity, or they are distributing the matter for political purposes or for the purposes of a religion or belief.

H. OFFENCES AND PENALTIES

1. If an authorised officer who reasonably believes that a person is or has been consuming alcohol in breach of a condition of the Order, or intends to consume alcohol in circumstances in which doing so would be a breach of such a condition requires that person:
 - (a) not to consume, in breach of the Order, alcohol or anything which the authorised officer reasonably believes to be alcohol;
 - (b) to surrender anything in their possession which is, or which the authorised officer reasonably believes to be, alcohol or a container of alcohol;

and that person fails without reasonable excuse to comply with such a requirement validly imposed commits an offence under section 63 of the 2014 Act and is liable on summary conviction to a fine not exceeding level 2 on the standard scale.

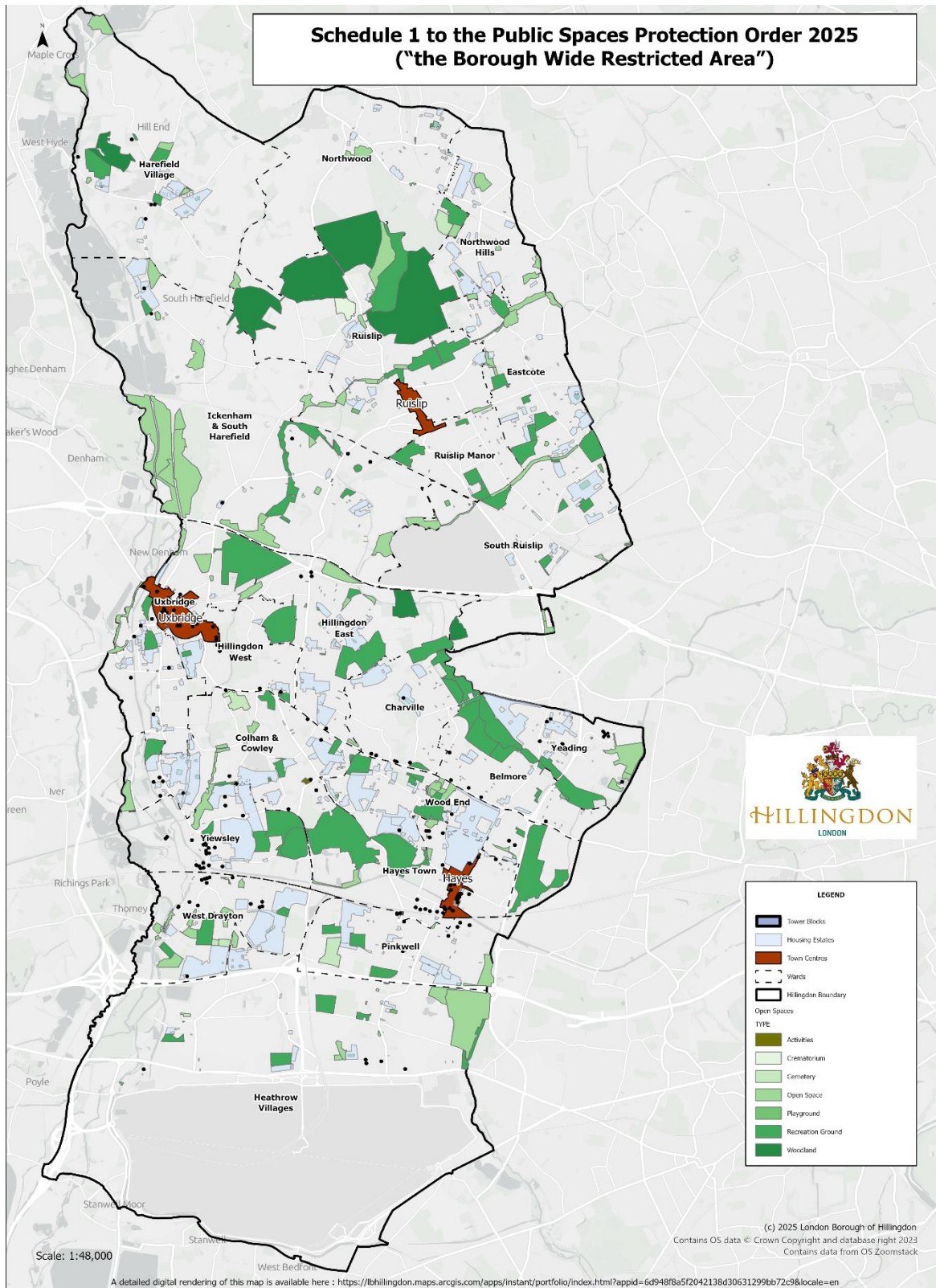
2. A person who without reasonable excuse does anything that they are prohibited from doing by the Order or fails to comply with a requirement to which they are subject under the Order is guilty of an offence under section 67 of the 2014 Act and shall be liable on summary conviction to a fine not exceeding level 3 on the standard scale.
3. An authorised officer may issue a fixed penalty notice under section 68 of the 2014 Act to any person they have reason to believe has committed an offence in relation to the Order, offering the person to whom it is issued the opportunity of discharging any liability to conviction for the offence by payment of a fixed penalty to the Council within 14 days.

I. APPEALS

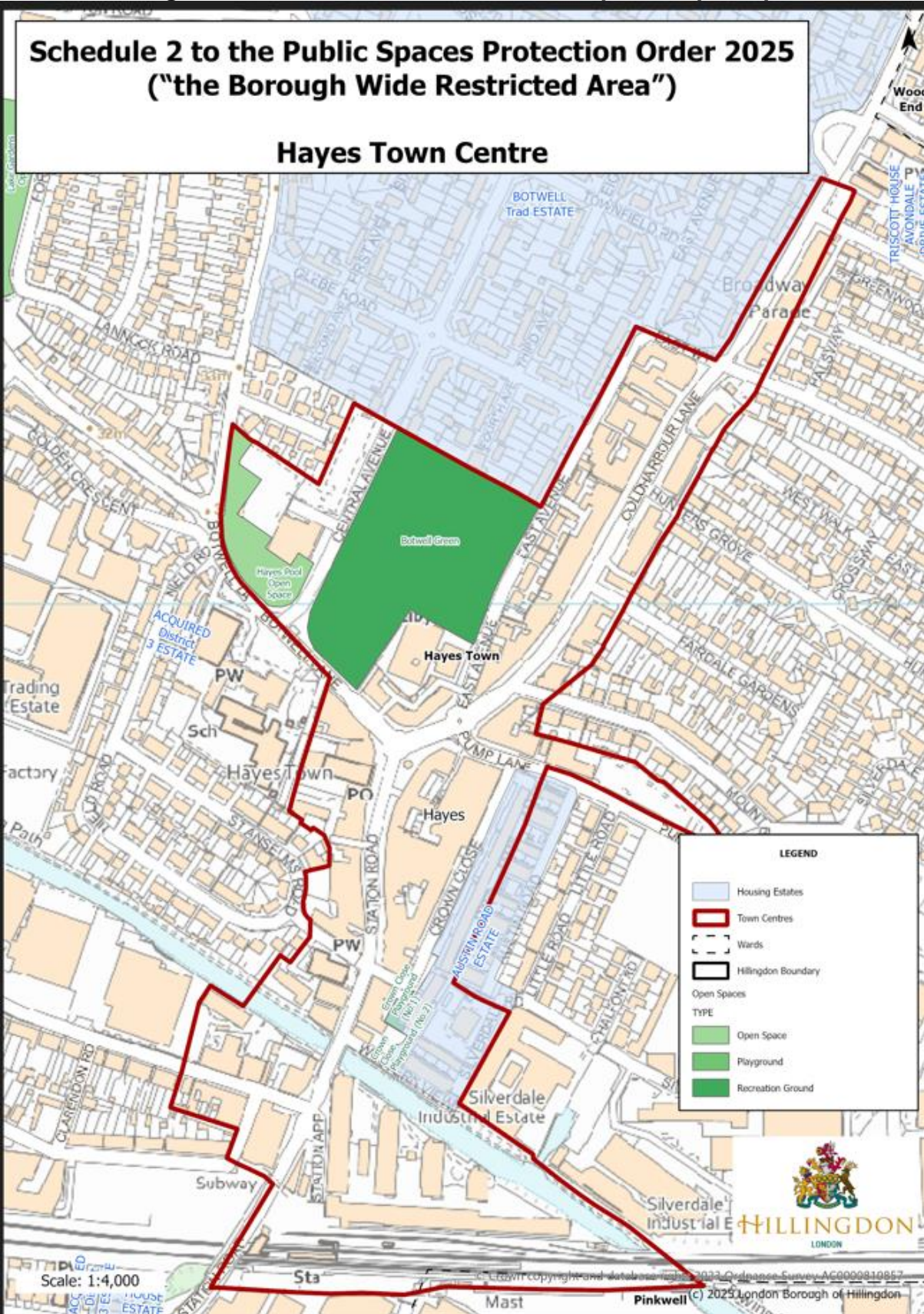
Under section 66 of the 2014 Act, an individual who lives in the Restricted Areas or who regularly works in or visits the Restricted Areas and wishes to question the validity of the Order on the grounds that the Council had no power to make it or that any requirement of the 2014 Act was not been complied with in relation to the Order may make an application to the High Court within the period of 6 weeks beginning from the date on which the Order is made.

SCHEDULE 1

Borough Wide Restricted Area and Green Spaces/Open Spaces

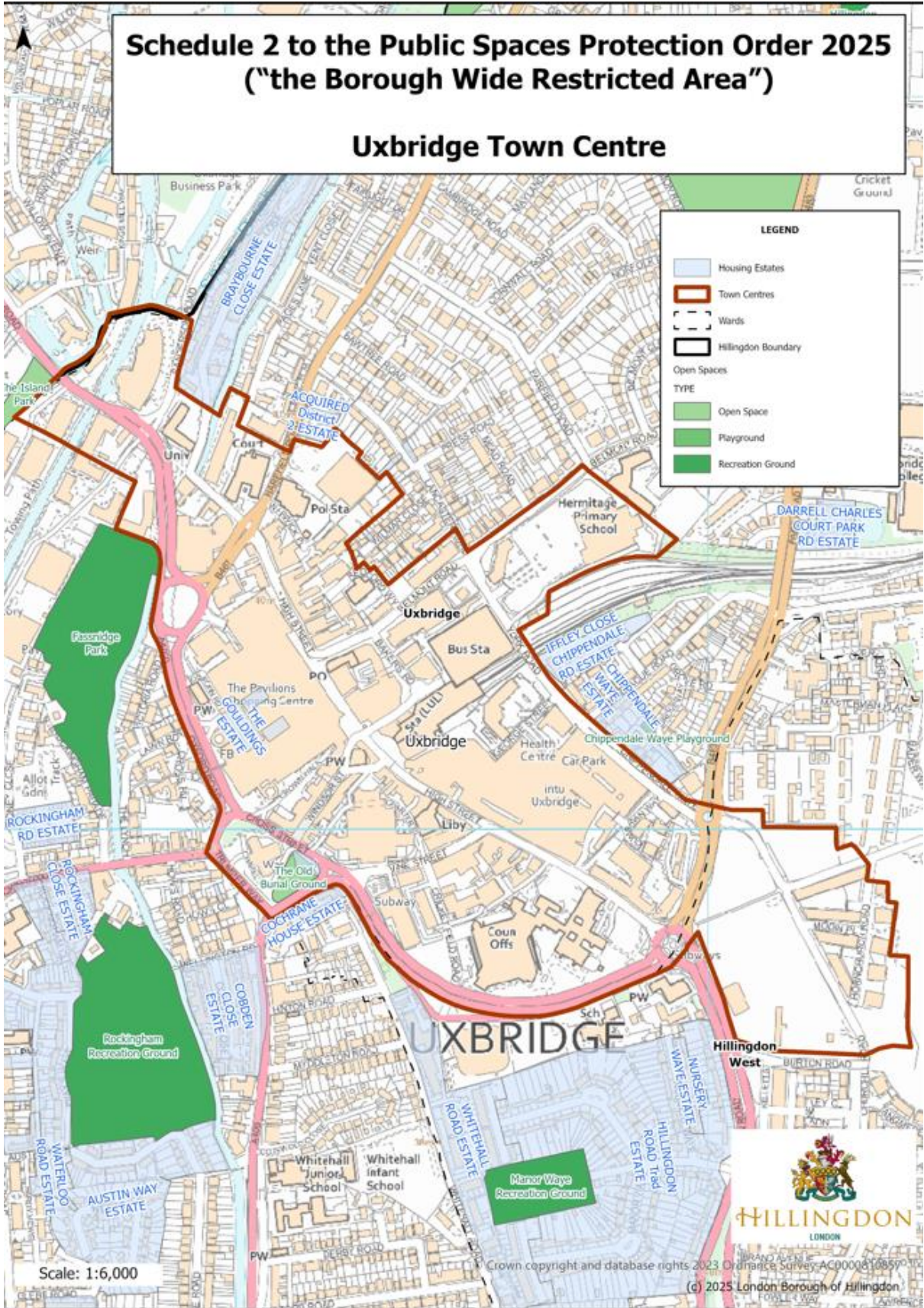


SCHEDULE 2
Borough Wide Restricted Area and Green Spaces/Open Spaces



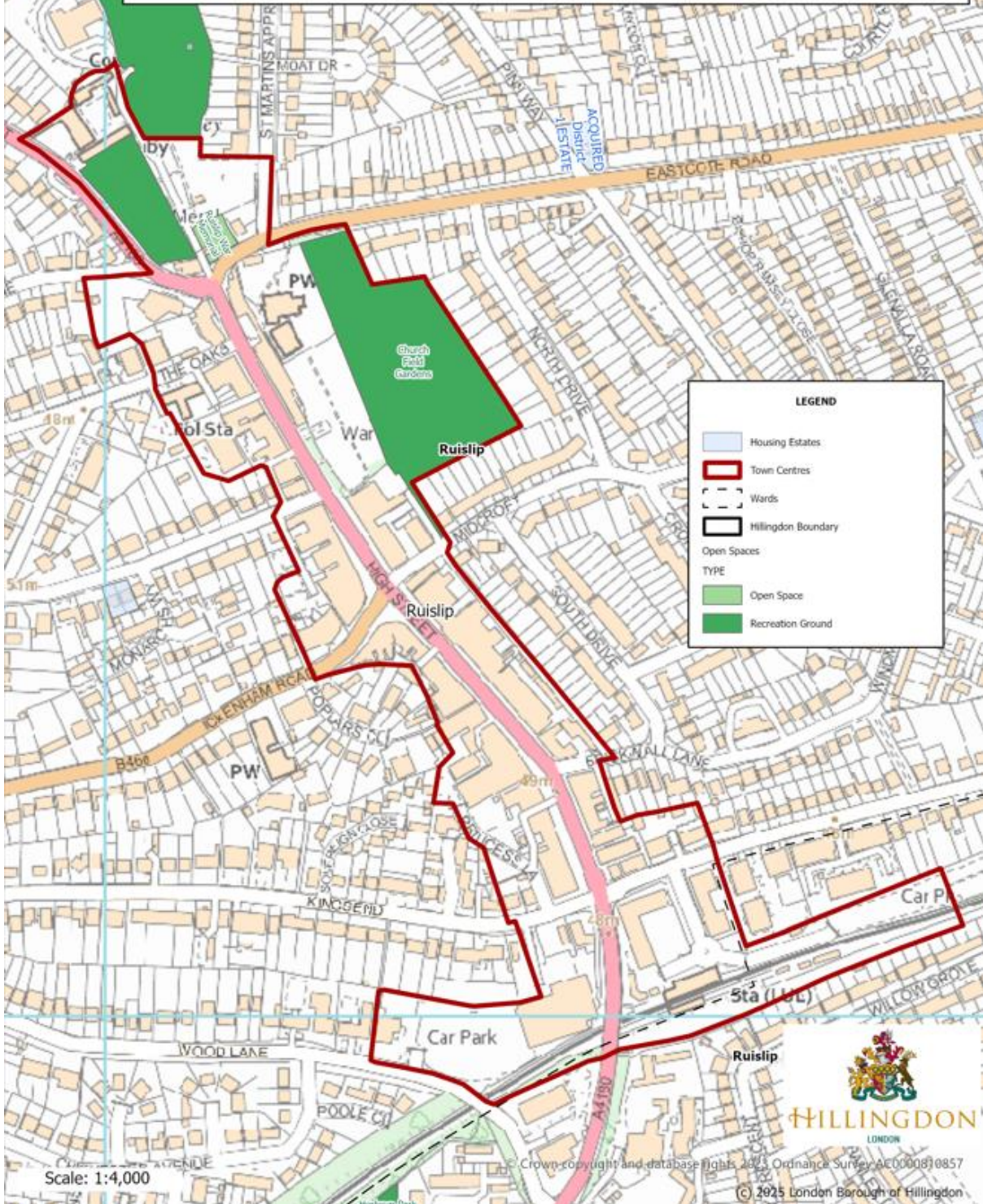
Schedule 2 to the Public Spaces Protection Order 2025 ("the Borough Wide Restricted Area")

Uxbridge Town Centre



**Schedule 2 to the Public Spaces Protection Order 2025
("the Borough Wide Restricted Area")**

Ruislip Town Centre



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HILLINGDON
LONDON

Appendix 2 - Equality and Human Rights Impact Assessment

A) Description of what is to be assessed and its relevance to equality

What is being assessed? Please tick ✓

Review of a service Staff restructure Decommissioning a service

Changing a policy ✓ Tendering for a new service A strategy or plan ✓

Public Spaces Protection Order ("PSPO"): Discharge of PSPO 2023 and proposed Borough Wide and Town Centres PSPO 2025. To assess the equalities and human rights impact of the proposed discharge of the current PSPO and the implementation of PSPO 2025

Who is accountable? E.g. Head of Service or Corporate Director

Corporate Director Home and Communities

Date assessment completed and approved by accountable person

Completed 19/03/25

Approved 19/03/25

Names and job titles of people carrying out the assessment

Joanne Howells – Service Manager, Street Scene Enforcement Team

A.1) What are the main aims and intended benefits of what you are assessing?

This equality and human rights impact assessment is being conducted as part of the discharge of the current PSPO 2023 and to assess the proposed PSPO 2025-2028.

PSPOs provides local authorities and Police with the necessary powers to introduce restrictions upon activity and behaviours occurring in public spaces and deemed to

have a detrimental effect on those in the locality. They can restrict and prohibit certain behaviours within the designated area where evidential tests are satisfied.

The proposed conditions for the PSPO 2025 target activities and behaviours identified from the evidence base (including complaints from residents and relevant enforcement data and information), complaints to Members, and issues which have a detrimental effect on the safety of residents and the wider public. The responses to the due consultation will be taken into account and may also add to the evidence base. The relevant activities include:

- Alcohol and drug misuse
- Idling vehicles
- Use of drones
- Urinating, defecating and spitting
- Dog control - in charge of more than 4 dogs (6 with a valid licence). fail to remove faeces and deposit it in appropriate receptacle
- encamp (with or without a vehicle) without the express consent of the Council.
- do not leave a park at the designated closing time or when required to do so by an authorised officer
- Begging - engaged in the act of begging for food or money that causes harassment, alarm, or distress to another person
- Being verbally abusive to any person or using foul language or behaving in a way which causes or is likely to cause harassment, alarm or distress to another person
- drive a motorised, electric or powered vehicle over any footway, footpath, grass verge adjacent to any part of the public highway or within the Councils Green Spaces. (This prohibition does not apply to those persons using mobility vehicles).
- Parks and open spaces - use a microphone, loudspeaker, megaphone, loud hailer, or any other similar equipment designed to amplify the volume of speech or music unless authorised by the council.
- use any device designed or adapted for detecting or locating any metal or mineral on or in the ground
- smoke any substance including cigarettes, cigars, electronic cigarettes (vapes), herbal cigarettes or similar within the boundary of a children's play area.
- engage in any type of fishing or dredge or remove any material from any park or open space

- Parks and open spaces - use a microphone, loudspeaker, megaphone, loud hailer, or any other similar equipment designed to amplify the volume of speech or music
- Parks and open spaces - light or are in control of or responsible for activity involving a fire, barbecue, or fireworks
- Parks and open spaces - do not extinguish a fire and/or barbecue or firework (if appropriate and safe to do so), removing all waste and/or associated items for safe disposal.
- drive a motorised, electric or powered vehicle over any footway, footpath, grass verge adjacent to any part of the public highway or within the Councils Green Spaces.
- use remote controlled model vehicles or aircraft that is likely to cause nuisance from noise or cause harassment, alarm, or distress to another person
- Participation and attendance in car meets/street racing
- Placing, leaving exposed, or distributing any type of food source in a public place to either feed or attract birds, or vermin

The PSPO places restrictions and requirements on people using the area defined. These can be blanket restrictions or targeted at groups (such as dog walkers) or apply at certain times. Breach of a PSPO without reasonable excuse is a criminal offence and may lead to a fixed penalty notice (FPN) of £100 or a maximum fine of £1,000 if prosecuted.

The PSPO conditions are designed to prevent the area from being misused and provide immediate relief to the residents, improving their safety and quality of life and deter those who are participating and organising gatherings which are causing severe nuisance and anti-social behaviour, increasing the fear of crime and reducing perception of safety within the community.

Hillingdon Council is committed to maintaining a clean and safe environment and it is the Council's responsibility to keep our public spaces and local environment clear of litter and obstructions and deal with other local environmental quality issues, including anti-social behaviour.

The proposal to adopt a new Borough Wide and Town Centres PSPO for Council public spaces is in line with the Council's corporate strategy priorities, will support communities to protect the built environment, parks and open spaces, and will protect residents and the environment against issues of enviro-crime and anti-social behaviour, which includes matters that cause harassment, annoyance or nuisance.

The Council knows that the majority of those who live in, work in and visit the borough do keep the area clean and safe; however, it wants to ensure where this is not the case that it uses the relevant legislation and approaches to maintain a clean and safe environment.

A.2) Who are the service users or staff affected by what you are assessing? What is their equality profile?

Some parts of the PSPO are to apply to the whole borough. Other conditions apply only in Uxbridge, Hayes and Ruislip town centres, identified on maps attached to the PSPO.

The PSPO is generally (bar any specific exemptions contained within it) to be applied to anyone within a public place within the designated areas and therefore affects Hillingdon's entire population. 2021 census information for Hillingdon indicates the characteristics of the borough's population, which stood at 305,900 at the time of the census:

https://www.nomisweb.co.uk/sources/census_2021/report?compare=E09000017.

Age

Aged 4 and under	6.5%
Aged 5 to 9 years	6.7%
Aged 10 to 15 years	7.7%
Aged 16 to 19 years	4.9%
Aged 20 to 24 years	6.5%
Aged 25 to 34 years	14.5%
Aged 35 to 49 years	22.4%
Aged 50 to 64 years	17.3%
Aged 65 to 74 years	7.2%
Aged 75 to 84 years	4.3%
Aged 85 years and over	1.9%

Sex

Female	50.6%
Male	49.4%

Sexual orientation

Straight or heterosexual	88.9%
Gay or Lesbian	0.9%
Bisexual	1.0%
Pansexual	0.1%
Asexual	0.0%
Queer	0.0%
All other sexual orientations	0/3%
Not answered	8.9%

Gender identity

Gender identity the same as sex registered at birth	91.7%
Gender identity different from sex registered at birth but no specific identity given	0.5%
Trans woman	0.2%
Trans man	0.2%
Non-binary	0.0%

All other general identities	0.0%
Not answered	7.4%

Marriage or civil partnership

Never married and never registered a civil partnership	37.0%
Married	48.5%
In a registered civil partnership	0.2%
Separated, but still legally married or in a civil partnership	2.0%
Divorced or civil partnership dissolved	7.1%
Widowed or surviving civil partner	5.1%

Ethnic Group

Asian, Asian British or Asian Welsh	33.3%
Black, Black British, Black Welsh, Caribbean or African	7.8%
Mixed or Multiple ethnic groups	4.4%
White	48.2%
Other ethnic group	6.3%

Religion

No religion	19.4%
Christian	39.0%
Buddhist	0.9%
Hindu	10.8%
Jewish	0.5%
Muslim	14.4%
Sikh	8.6%
Other religion	0.9%
Not answered	5.6%

Employment

Economically active (excluding full-time students): in employment	57.2%
Economically active (excluding full-time students): unemployed	3.9%
Economically active and a full-time student: employed	1.9%
Economically active and a full-time student: unemployed	0.9%
Economically inactive: retired	15.5%
Economically inactive: student	7.2%
Economically inactive: looking after home or family	6.5%
Economically inactive: long-term sickness or disabled	2.9%
Economically inactive: other	4.0%

Disability

Disabled: day-to-day activities limited a lot	6.5%
Disabled: day-to-day activities limited a little	8.2%

Not disabled: has long term physical or mental health condition but day-to-day activities are not limited	4.9%
Not disabled: no long term physical or mental health condition	82.2%

Data is not currently collected for those to whom enforcement action is taken against.

A.3) Who are the stakeholders in this assessment and what is their interest in it?

Stakeholders	Interest
Those who live in, work or visit Hillingdon borough	<p>To ensure that public spaces in the borough can be used safely and without fear of nuisance, annoyance or other anti-social behaviour.</p> <p>To ensure any enforcement action is fair and transparent.</p>
Corporate Director Homes and Communities	<p>To ensure that public spaces in the borough can be used safely and without fear of nuisance, annoyance or other anti-social behaviour.</p> <p>To ensure any enforcement action is fair and transparent.</p> <p>To ensure value for money in service delivery.</p>
Council Leader and Cabinet	<p>To ensure that public spaces in the borough can be used safely and without fear of nuisance, annoyance or other anti-social behaviour.</p> <p>To ensure any enforcement action is fair and transparent.</p> <p>To ensure value for money in service</p>

	delivery.
Enforcement and other partners and agencies	To ensure that public spaces in the borough can be used safely and without fear of nuisance, annoyance or other anti-social behaviour. To ensure any enforcement action is fair and transparent. To ensure value for money in service delivery.

A.4) Which protected characteristics or community issues are relevant to the assessment? Tick in the box ✓

Age	✓	Sex	✓
Disability	✓	Sexual Orientation	✓
Gender reassignment	✓	Socio-economic status	✓
Marriage or civil partnership	✓	Carers	✓
Pregnancy or maternity	✓	Community Cohesion	✓
Race/Ethnicity	✓	Community Safety	✓
Religion or belief	✓	Human Rights	✓

B) Consideration of information: data, research, consultation, engagement

B.1) Consideration of information and data - what have you got and what is it telling you?

The PSPO sets out a range of powers available to the Council and how these will be legally applied. Its use will be determined by the behaviour occurring and is not directed at any group. The PSPO is generally (bar any specific exemptions contained within it) to be applied to anyone within a public place within the designated areas and therefore affects Hillingdon's entire population.

In the absence of data to understand the actual impacts of the PSPO on equality characteristics, officers consulted and engaged with a variety of stakeholders and the public to identify what the potential impact on equality characteristics may be. These potential impacts have been outlined in Section C.

In the future, the equality characteristics of those against whom enforcement action is taken will be recorded.

This assessment will also be reviewed in 6 months' time.

B.2) Did you carry out any consultation or engagement as part of this assessment?
Please tick ✓

No

Yes

Section 72(4) of the Anti-Social Behaviour, Crime and Policing Act 2014 (the 2014 Act) sets out the consultation requirements that apply when a PSPO is made, extended, varied or discharged.

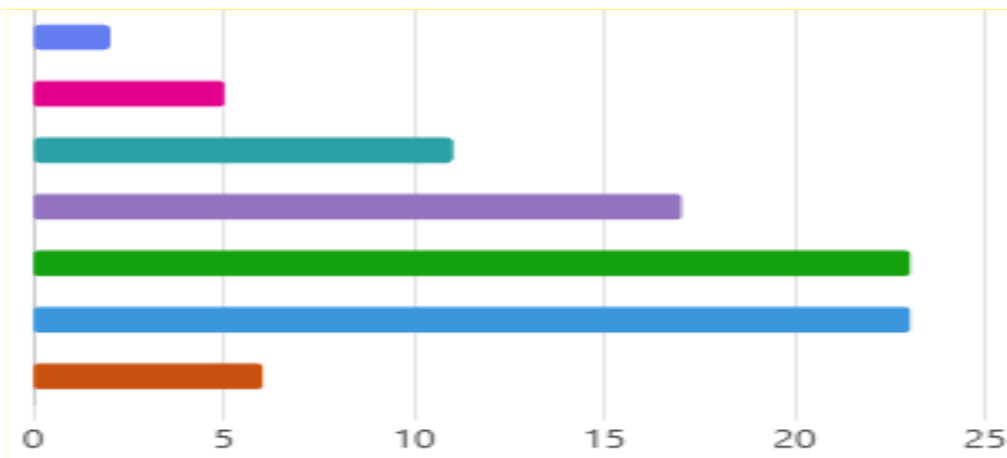
The Council is required to consult with:

- a. The chief officer of police and the local policing body
- b. Whichever community representatives the Council think appropriate
- c. The owners or occupiers of land within the restricted areas

The Council also issued a public consultation survey.

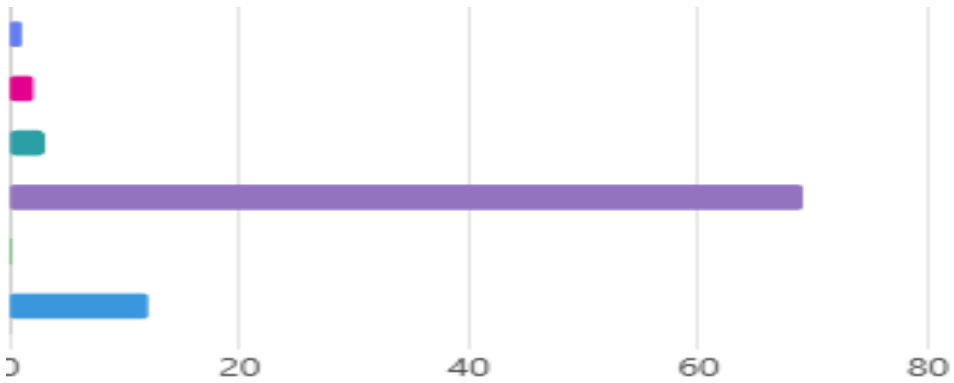
The equality profile of those who responded is presented below (data labels for the chart axis is shown below the table for clarity):

Age



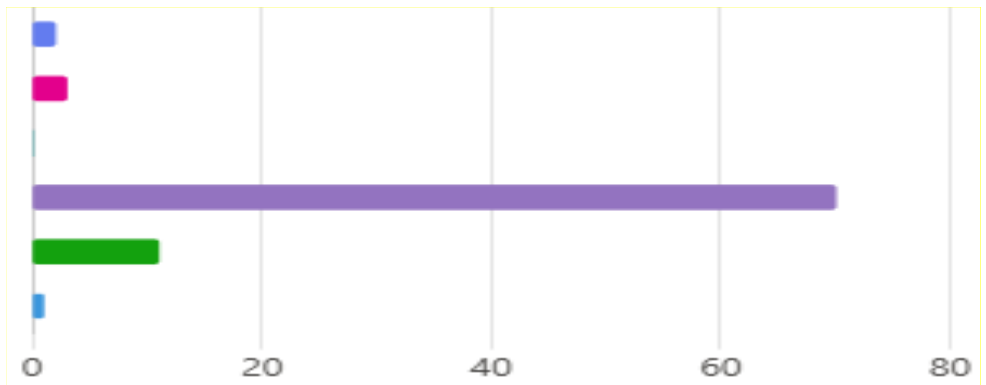
- Under 25 - 2
- 25-34 - 5
- 35-44 - 11
- 45-54 - 17
- 55-64 - 23
- 65+ - 23
- Prefer not to say - 6

Ethnic Background



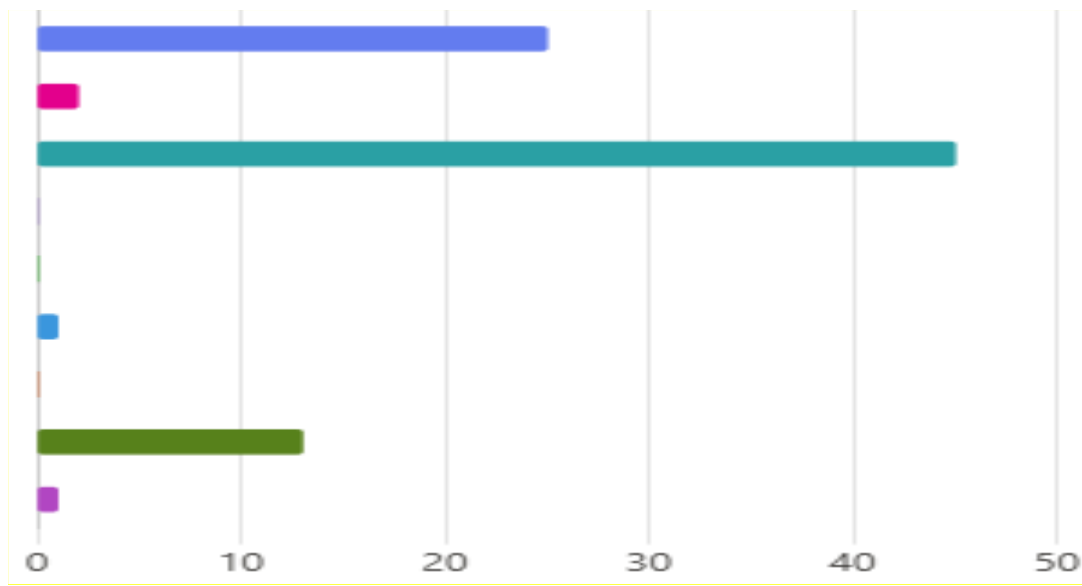
- Asian or Asian British ethnic group - 1
- Black, Black British, Caribbean, or Africa - 2
- Mixed or multiple ethnic group - 3
- White group or background - 69
- Other ethnic group or background - 0
- Prefer not to say - 12

Sexual Orientation



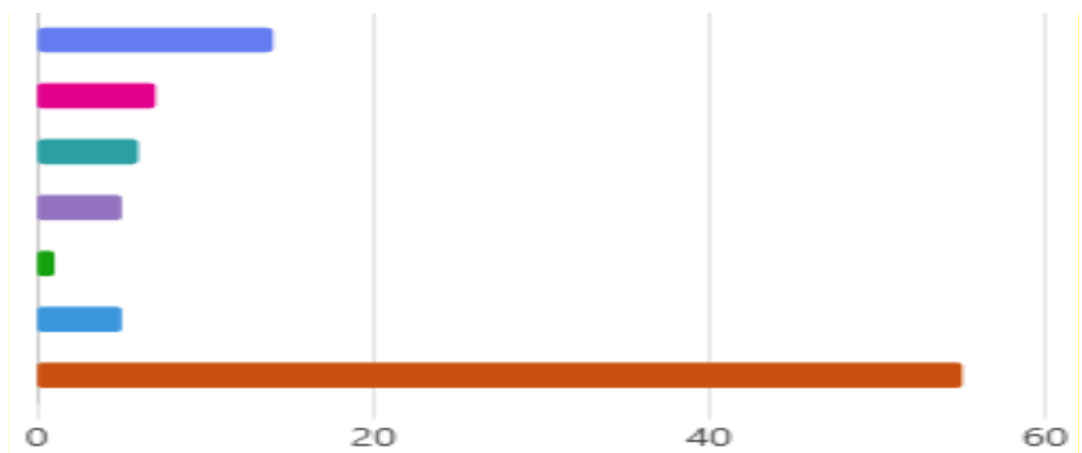
- Bisexual - 2
- Gay - 3
- Lesbian - 0
- Straight/heterosexual - 70
- Prefer not to say - 11
- Other - 1

Religion or belief



- No religion - 25
- Buddhist - 2
- Christian (Catholic, Church of England) - 45
- Hindu - 0
- Jewish - 0
- Muslim - 1
- Sikh - 0
- Prefer not to say - 13
- Other - 1

Type of disability



- Physical - 14
- Mental - 7
- Mobility - 6

- Hearing - 5
- Visual - 1
- Learning - 5
- Other - 55

64% of respondents supported the proposal to discharge PSPO 2023 and introduce PSPO 2025

67% of respondents supported the proposed conditions

90% of respondents supported the geographical scope of the proposed borough-wide PSPO conditions

64% of respondents supported the geographical scope of the proposed town centre PSPO conditions

B.3) Provide any other information to consider as part of the assessment

Legal context

In discharging or making a PSPO, the Council must follow the scheme provided in the 2014 Act.

The Council also has an ongoing public duty to pay due regard to the need to eliminate discrimination, advance equality of opportunity and foster good relations (Equality Act 2010, section 149). It is believed that the proposed PSPOs will have a positive impact on the ability of people to use public space safely and without fear of nuisance, annoyance or other anti-social behaviour.

The Council, as a public authority, is also required to comply with the Human Rights Act 1998 on an ongoing basis in relation to observation of certain rights protected by the European Convention of Human Rights. Section 72(1) of the 2014 Act requires the Council to have particular regard to article 10 (right to freedom of expression) and 11 (right to freedom of assembly) of the Convention.

The article 10 right (right to freedom of expression) may be engaged due to PSPO conditions restricting verbal abuse, lewd, obscene or sexist comments or gestures towards a member of the public.

However, this is limited to scenarios where the behaviour is likely to cause harassment, alarm or distress to another person and therefore any interference would be justified as being prescribed by law and in pursuance of a legitimate aim (namely in the interests of public safety, the protection of public health, the prevention of crime and disorder, and the protection of the rights and freedoms of others). The PSPO conditions are limited to what is proportionate and necessary according to the evidence base. The Council will continue to ensure this is the case through a flexible and sensitive enforcement approach.

The article 11 right (right to freedom of assembly and association) may also be engaged. However, the PSPO places restrictions on how people can use our public spaces, not their ability to use it or gather. The PSPO does not prevent the freedom to peacefully assemble. There are no restrictions on gatherings per se or the number of people that can gather together.

As such, the PSPO does not interfere with the article 11 right. However, even if article 11 were engaged, the interference would be justified as being prescribed by law and in pursuance of a legitimate aim (namely in the interests of public safety, the protection of public health, the prevention of crime and disorder, and the protection of the rights and freedoms of others). The PSPO conditions are limited to what is proportionate and necessary according to the evidence base. The Council will continue to ensure this is the case through a flexible and sensitive enforcement approach.

C) Assessment

What did you find in B1? Who is affected? Is there, or likely to be, an impact on certain groups?

C.1) Describe any **NEGATIVE** impacts (actual or potential):

EQUALITY GROUP	IMPACT: RELEVANT PSPO CONDITIONS <i>Based on observation and information, PSPO conditions targeting the following activities may affect the equality group more than other groups</i>	ACTIONS
Young people	<u>Alcohol and drugs</u>	Where appropriate, provide increased educational information on alcohol harm and drug use to young people. Work closely with schools, colleges and universities to ensure that there is a good understanding of the application of the PSPO to their students and support available where needed.
	<u>Anti-social behaviour</u>	Respond to children (17 years and under) acting anti-socially as a need for support / safeguarding rather than PSPO formal enforcement.

	<u>Car meets and street racing</u>	The PSPO enables the Council and Police to issue immediate penalties to those organising or participating in illegal car meets and street racing. Since these events are illegal, no negative impacts have been identified arising from the inclusion of these prohibitions in the PSPO.
Those with poor physical or mental health or other vulnerabilities	Poor physical or mental health and/or other vulnerabilities may cause people to act in breach of the conditions.	Hillingdon Council hold regular meetings with the Police and with Community Safety Partners, including those who provide support and provisions for vulnerable people. Alleged offenders will be appropriately signposted to relevant support services. We will continue to refer and signposting individuals to commissioned support services.
People with disabilities who use assistance dogs	<u>Dog control</u> It is recognised that people with mobility problems or visual impairments who use assistance dogs may find it more challenging to comply with the dog control conditions.	There are exemptions included in the PSPO to exempt people who use assistance dogs from these conditions.
People with lower socio-economic status	<u>Alcohol</u> The PSPO will challenge drinking behaviour in all public spaces. There is some anecdotal information which suggests that some deprived areas across the Borough have disproportionate street drinking whereas some more affluent areas are subject to issues around the 'night economy'.	All agencies should be mindful of displacement and should consider appropriate actions.
Street Population Community / Homeless	<u>Alcohol</u> The PSPO will affect those with dependency issues,	We will ensure that enforcement is justified and fair, is sensitive to needs and signposts appropriately to support provisions.

	<p>a known problem for the street population community and can be the reason that led to someone becoming homeless. The Council recognises street drinking is prominent amongst the street homeless population, and they often suffer from ill mental health.</p>	<p>There is a sustained and significant programme of outreach work with people who are rough sleeping to encourage and support them to engage with the Council to find alternatives to life on the street. Similarly, officers will engage with anyone who is begging to encourage them to access support services.</p>
	<p><u>Encampments</u> The homeless community may also be impacted by conditions on encampments and obstructions as they have no fixed abode.</p>	
Those from the Gypsy, Roma, Traveller communities	Encampments	The condition provides an exception where authorisation is sought from the Council. The Council will consider reasonable authorisation requests.
Religious groups	<p><u>Distribution of free printed matter</u> Religious groups are known to conduct outreach in town centres, which includes distributing leaflets and literature for religious purposes</p>	<p>Pursuant to paragraph 1(4) of Schedule 3A to the Environmental Protection Act 1990, no offence is committed in relation to distribution of free printed matter:</p> <p>(a) by or on behalf of a charity where the printed matter relates to or is intended for the benefit of the charity;</p> <p>(b) where the distribution is for political purposes or for the purposes of a religion or belief.</p> <p>This wording has been included in the PSPO wording to confirm that religious groups are exempt from the condition.</p>

C.2) Describe any **POSITIVE** impacts (actual or potential):

EQUALITY GROUP	IMPACT AND ACTION NEEDED
Whole population	<p>The introduction of the Borough Wide PSPO is an additional tool to enable Council and police officers to manage specific types of behaviour that has a detrimental impact to all, particularly vulnerable groups. As a result:</p> <ul style="list-style-type: none"> • People will feel safer across the borough • Community cohesion will increase as people feel safer in their neighbourhoods • There can be a more coordinated response to detrimental behaviours • There will be reduced complaints and dissatisfaction from the public • Access and signposting to support services will be more effective as pathways from detrimental behaviours for vulnerable people are strengthened • People will be protected from detrimental and anti-social behaviour, so they feel safe living, working and visiting the area
Children and the elderly	<p>The impact on all of the community including the elderly, young people and children has been taken into account in implementing the PSPO not least the impact on young people who live in the borough who have felt increasingly excluded from being able to access and enjoy public spaces.</p> <p>For the avoidance of doubt, this does not just refer to young children whose parents have felt unable to allow them to play in open spaces due to the impact of urination, defecation, and anti-social behaviour, but also older young people and the elderly.</p> <p>Safety is a concern for all age groups; therefore, this PSPO should have a positive impact across all ages. All ages will benefit from improved cleanliness.</p>
<p>Groups that may be more likely to experience intimidation and discrimination, e.g.</p> <p>Women</p> <p>LGBTQ+</p> <p>Various race / ethnicity groups</p> <p>Disabled</p>	<p>Whilst the PSPO is designed to prohibit certain activities it is also designed to enable people to feel that Hillingdon is a safe and welcoming place for all.</p> <p>There are some sections of the community who currently may not feel this is the case (e.g. some older people, disabled people, women, LGBTQ+ community, certain race / ethnic groups, etc) due to experience of prejudice, hate crime and discrimination and behaviours that intimidate and harass them on account of their</p>

	<p>protected characteristics, which could have a negative impact on the individuals and the likelihood that they will choose not to visit the Borough.</p> <p>The implementation of the PSPO will encourage more responsible use of public places and tackle intimidating behaviours. It could therefore potentially have a positive impact on these groups.</p>
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D) Conclusions

PSPOs give local authorities the opportunity to bring in proportionate measures for a maximum of 3 years and are being adopted by many local authorities in the UK.

The introduction of the proposed PSPO impacts the lives of people who live, work and visit Hillingdon Borough. The conditions will impact positively on people whose protective characteristics see them impacted upon by the behaviour the PSPO is designed to address. The legitimate aim of the PSPO is to deal with a particular nuisance or problem in an area that is detrimental to the local community's quality of life by imposing conditions on the use of that area that applies to everyone. It is designed to ensure people can use and enjoy public spaces safe from anti-social behaviour. This action is proportionate and necessary.

Furthermore, there are some exceptions built into some of the PSPO conditions to mitigate negative impact. These include exceptions for particular groups of people (e.g. those requiring use of assistance dogs; those using mobility vehicles) and broader exceptions (e.g. those who obtain prior written permission from the Council).

The initiative will also support the delivery of the Council's borough plan, supporting strategic themes around putting residents first.

The Council's Environmental Enforcement and Street Scene Officers will police the PSPO primarily, however there will be some assistance from relevant Police Safer Neighbourhood Teams.

The advice, warnings and enforcement of the PSPO will be logged in the pocket notebooks of Officers and on Council and Police databases.

The authorised officers who enforce the PSPO will continue to consider the needs of the individuals and their circumstances to make an informed and balanced decision as to the appropriateness of action to take. They will recognise that no offence is committed where reasonable excuse exists for breach of a PSPO condition and make appropriate enquiries on a case-by-case basis to determine whether reasonable excuse exists. Officers will also continue to receive training on subjects such as equality and diversity, to ensure the enforcement process is fair and transparent.

Young people in breach of the PSPO will be referred through safeguarding arrangements when appropriate.

Mental health considerations are assessed on a case-by-case basis and support and early intervention will be used prior to more serious enforcement action.

Council and police officers will continue the partnership approach across the Hillingdon Borough avoiding duplication where possible and in accordance with the Council's Corporate Enforcement and Anti-Social Behaviour Policies. The authorised officers who enforce the PSPO will consider the needs of the individuals and their circumstances to make an informed and balanced decision as to the appropriateness of action to take.

They will enforce with reasonable discretion, identifying people with vulnerabilities and providing appropriate advice, signposting information and/or referrals on their behalf (e.g. safeguarding).

Any abuse of discretion when enforcing the proposed PSPOs will be dealt with swiftly using internal procedures which could include additional training or management action.

Anyone who is issued with an FPN given for breach of the proposed PSPO may make representation or lodge a corporate complaint which would be investigated and responded to by a Senior Manager.

It is important to note that there are no formal grounds of appeal against a FPN. It is an invitation for an individual to discharge their liability to prosecution. In essence, this means that whilst this is not an admission of an individual's guilt, it is an agreement that the individuals accept that an offence has been committed and that by paying the sum of money specified, no further action will be taken by, or on behalf of the Council.

This method of dealing with offences not only saves time involved for everyone in prosecuting cases at court, but the cost associated with an FPN is likely to be substantially lower than any fine imposed by the courts. This is a further positive impact of the PSPO.

The operation of the PSPO will be kept under review in accordance with the Council's public sector equality duty and human rights duties. Discharge or variation of a PSPO can be undertaken in line with statutory procedure under the 2014 Act if necessary.

COMPLETED BY:

Signed:



Name:

Joanne Howells

Position:

Service Manager, Street Scene Enforcement

Dated:

5th March 2025

APPROVED BY:

Signed: 

Name: Daniel Kennedy

Position Held: Corporate Director, Home and Communities

Dated: 19/03/25

PUBLIC PREVIEW:

MATTERS TO BE CONSIDERED LATER IN PRIVATE

Cabinet Member(s)	As appropriate
Cabinet Portfolio(s)	As appropriate
Officer Contact(s)	Mark Braddock – Democratic Services
Papers with report	None

HEADLINES

Summary	<p>A report to Cabinet to provide maximum transparency to residents on the private matters to be considered later in Part 2 of the Cabinet meeting and agenda.</p> <p>This will enable Cabinet Members to openly discuss such matters generally in public, and via the Council’s live broadcast of the meeting, without prejudicing their later consideration in private.</p>
<p>Putting our Residents First</p> <p>Delivering on the Council Strategy 2022-2026</p>	<p>This report supports our ambition for residents / the Council of: An efficient, well-run, digital-enabled council working with partners to deliver services to improve the lives of all our residents</p> <p>This report supports our commitments to residents of: A Digital-Enabled, Modern, Well-Run Council</p>
Financial Cost	As set out in the report.
Relevant Select Committee	As set out in this report under each item – however, this item is not for scrutiny call-in as it is information only.
Ward(s)	As set out in the report

RECOMMENDATION

That Cabinet note the reports to be considered later in private and Part 2 of the Cabinet agenda and comment on them as appropriate for public information purposes.

Reasons for recommendation

Why are certain reports considered in private?

As a transparent, democratic organisation, the Council's Cabinet will consider matters in public on Part 1 of this Cabinet agenda. However, there will inevitably be some reports that will need to be considered in private. These would generally relate to contracts, property transactions or commercially sensitive information, for example, tender bids from commercial organisations, which if made public, could prejudice the Council's ability secure value-for-money for resident taxpayers.

This information is also called 'exempt' information and is considered in Part 2 of any Cabinet agenda by applying the relevant section of the Part 1 of Schedule 12 (A) to the Local Government Act 1972 (as amended), in that the report contains certain information and that the public interest in withholding that information outweighs the public interest in disclosing it.

How can the public find out more about the private reports?

To ensure maximum transparency when the Cabinet considers such private reports:

- 1) They are first given advance notice on the Cabinet's Forward Plan in summary form setting out the reason why they will be considered in private. The [Forward Plan](#) is a public document setting out all the expected decisions the Cabinet will make over the coming year, except those that are urgent, and is available on the Council's website to view;
- 2) This report provides a fuller public preview of the matters to be discussed in Part 2 of this Cabinet meeting and gives an opportunity for Cabinet Members to highlight issues of significance within and for public information purposes, without prejudicing their later fuller consideration in private. It also sets out the recommendations in general terms that are being proposed for a decision on.
- 3) Consideration of this report will also be broadcast live on the Council's YouTube channel: Hillingdon London, and available for viewing afterwards, for wider democratic engagement.
- 4) After these private reports are considered in Part 2 of this Cabinet meeting, Cabinet's full decisions on them will then be published on the Council's website the day after the Cabinet meeting, along with the decisions on the other matters already considered in public.

Alternative options considered

Cabinet could resolve to release any private report into the public domain in extraordinary or highly exceptional cases, where it considers the public interest in disclosing the information outweighs the public interest in withholding it. However, to ensure greater transparency on all private matters considered, this public preview item is advised as the most suitable way forward.

Legal comments

Such private matters are considered in accordance with Local Government Act 1972 (as amended) Access to Information provisions and also The Local Authorities (Executive Arrangements) (Meetings and Access to Information) (England) Regulations 2012. This report enables such matters to be discussed in public as far as is possible under the relevant legislation.

SUPPORTING INFORMATION

ITEM 12 - HEATHROW RESIDENTIAL PROPERTY LEASES

Relevant Cabinet Member	Cllr Jonathan Bianco Cabinet Member for Corporate Services & Property
Relevant Ward(s)	Heathrow Villages / All Wards
Relevant Select Committee	Residents' Services Select Committee

Information

The report seeks approval to enter into commercial leases in the Heathrow area to secure a number of family-sized units of self-contained accommodation for use as temporary housing for homeless households.

The number of households presenting to the Council as homeless has risen sharply in the last 24 months, leading to a sharp increase in the use of high-cost, spot-purchased temporary accommodation. The proposal aims to provide lower-cost, higher-quality temporary housing options compared to spot-purchased, nightly charged accommodation.

The proposals aim to prevent homelessness by increasing the supply of suitable, affordable housing for eligible homeless residents, thereby reducing the overall cost of homelessness services to the General Fund. As such, the recommendations in the report align with the Council's Medium Term Financial Strategy and support the temporary accommodation reduction strategy recently approved by Cabinet.

The report also considers alternative options and risks, noting that doing nothing could lead to a sharp increase in levels of homelessness. The approval of such leases is a Cabinet decision.

ITEM 13 - SMOKING CESSATION AND DRUG AND ALCOHOL TREATMENT SERVICES

Relevant Cabinet Member	Cllr Jane Palmer, Cabinet Member for Health & Social Care
Relevant Ward(s)	N/A
Relevant Select Committee	Health and Social Care Select Committee

Information

This report proposes to continue the variation to the current public health grant-funded contract that delivers smoking cessation and substance misuse services.

It outlines two grants from the Department of Health & Social Care (DHSC) to fund these services that have been received by the Council:

1. Local Stop Smoking Services Grant: This is the second year of a five-year funding plan, with an allocation of £311,123 for Hillingdon for 2025/268. The grant aims to expand smoking cessation services, targeting vulnerable adult groups and preventing children from starting to smoke and vape.
2. Drug and Alcohol Treatment and Recovery Improvement Grant (DATRIG): This is the first additional year following an initial three years of funding for adult substance misuse, treatment, and recovery services. The total DATRIG allocation for Hillingdon is £1,664,772, with a minimum of £585,543 to be spent on drug and alcohol support for rough sleepers.

The purpose of the report is to seek approval for the continuation of these grants and the variation of the contract between the Council and the Central and North West London NHS Trust for the enhanced delivery of these services to residents of the Borough.

The report outlines the importance of these services in improving public health outcomes, reducing health disparities, and providing essential support to vulnerable populations in the Borough.

The report also highlights the financial implications, noting that the continuation of funding for these services each year will depend on national allocations and will not be supplemented Council resources.

ITEM 14 - CONTINGENT LABOUR CONTRACT VARIATION

Relevant Cabinet Member	Cllr Jonathan Bianco, Cabinet Member for Corporate Services & Property
Relevant Ward(s)	N/A
Relevant Select Committee	Corporate Resources and Infrastructure

Information

The report seeks Cabinet approval to vary the current primary contract the Council has for its Temporary Agency Workers. This contract enables the Council to supplement its directly employed workforce with professional, technical, administrative, and social care agency workers across all Hillingdon directories, ensuring the maintenance of front-line services for Hillingdon residents.

The report highlights the importance of such arrangements in supporting the Council's workforce strategy, which includes covering absences, sickness, and unfilled vacancies. This ensures the continuity of Council services without impacting Hillingdon's residents.

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Exempt information by virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972 (as amended).

Agenda Item 12

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Agenda Item 13

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Agenda Item 14

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