



HILLINGDON  
LONDON



# Cabinet

**Date:** THURSDAY, 27 MAY 2010

**Time:** 7.00 PM

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

**Meeting  
Details:** Members of the Public and  
Press are welcome to attend  
this meeting

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## Councillors in the Cabinet

Ray Puddifoot (Chairman)  
*Leader of the Council*

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

Jonathan Bianco  
*Finance & Business Services*

Keith Burrows  
*Planning & Transportation*

Philip Corthorne  
*Social Services, Health & Housing*

Henry Higgins  
*Culture, Sport & Leisure*

Sandra Jenkins  
*Environment*

Douglas Mills  
*Improvement, Partnerships & Community Safety*

Scott Seaman-Digby  
*Co-ordination & Central Services*

**Published:** Wednesday, 19 May 2010

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# Agenda

- 1 Apologies for Absence
- 2 Declarations of Interest in matters coming before this meeting
- 3 To confirm the minutes of the previous meeting held on 15 April 2010 1 - 10
- 4 To confirm that the items of business marked Part 1 will be considered in public and that the items of business marked Part 2 in private

## **Cabinet Reports - Part 1 (Public)**

- 5 Education and Children's Services Policy Overview Committee Major Review: How the Council works with partner agencies to provide safeguarding for children at Heathrow Airport as a port of entry (Cllr Simmonds) 11 - 40
- 6 Residents' and Environmental Services Policy Overview Committee Review: Illegal cosmetics and illegally imported foods (Cllr Jenkins) 41 - 68
- 7 Hillingdon Local Development Framework - Consultation Draft Core Strategy (Cllr Burrows) 69 - 74
- 8 Requirements for Additional Primary School Places (Cllr Simmonds) 75 - 86
- 9 Review of the Local List of Buildings of Architectural or Historic Importance (Cllr Burrows) 87 - 116
- 10 Supporting People Programme and Sheltered Housing (Cllr Corthorne) 117 - 122

## **Cabinet Reports - Part 2 (Private and Not for Publication)**

- |           |   |           |
|-----------|---|-----------|
| <b>11</b> | Ruislip Gardens Primary School - tender acceptance for roofing works and internal alterations (Cllrs Bianco & Simmonds)   | 123 - 136 |
| <b>12</b> | Contract for the supply of a double base class unit at each of the following schools: Brookside, Rabbsfarm and William Byrd Primary Schools (Cllrs Bianco and Simmonds) | 137 - 146 |
| <b>13</b> | Ruislip Lido - Toilets and Changing Room Facilities (Cllrs Bianco, Jenkins & Seaman-Digby)  | 147 - 158 |
| <b>14</b> | 1 & 2 Merrimans, West Drayton Road, Hillingdon (Cllr Bianco)  | 159 - 164 |
| <b>15</b> | Barnhill PFI - new contractual arrangements (REPORT TO FOLLOW)  |           |

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

- 16** Other items which the Chairman decides are relevant or urgent

## Minutes

### Cabinet

Thursday, 15 April 2010

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



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Published on: 16 April 2010

Decisions come into effect on: 23 April 2010

#### **Cabinet Members Present:**

Ray Puddifoot (Chairman)  
David Simmonds (Vice-Chairman)  
Jonathan Bianco  
Keith Burrows  
Sandra Jenkins  
Douglas Mills

#### **Members also Present**

Brian Crowe  
Judy Kelly  
Edward Lavery  
Mary O'Connor  
David Yarrow

#### **161. APOLOGIES FOR ABSENCE**

Councillors Corthorne, Higgins, Seaman-Digby and G. Cooper sent their apologies.

#### **162. DECLARATIONS OF INTEREST IN MATTERS COMING BEFORE THE MEETING**

Councillor Mills declared a personal interest in Item 8 on the agenda (minute 168) as a relative worked in the department affected by the re-organisation proposals. He remained in the room whilst the decision took place.

#### **163. TO CONFIRM THE MINUTES OF THE PREVIOUS MEETING HELD ON 18 MARCH 2010**

The minutes of the previous meeting were confirmed.

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

This was confirmed.

**165. MAJOR SCRUTINY REVIEW: CHILDREN & YOUNG PEOPLE WHO ABUSE THEIR PARENTS & CARERS**

*The Chairman of the External Services Scrutiny Committee, Councillor Mary O'Connor, presented the major scrutiny review undertaken by the Children and Young People who abuse their Parents and Carers Working Group. The Cabinet welcomed and commended the recommendations and expressed their thanks to the Chairman of the Working Group, Cllr Judy Kelly and the witnesses and Council officers involved.*

**RESOLVED:**

**That Cabinet:**

- 1. Welcomes the report of the Children & Young People Who Abuse Their Parents & Carers Working Group; and**
- 2. Accepts the recommendations of the Working Group report as reflected below:**
  - i. That Cabinet endorse the Working Group's view that there is evidence available to suggest that, in some families, one or other parent is a victim of abuse by their child. This is an issue of great concern and failure to tackle it now will have a significant impact on many families in our Borough.**
  - ii. That Cabinet agree that the Domestic Violence Strategic Coordinator work with the Education and Children's Services Directorate, the Youth Offending Team and partner agencies to identify and enhance the support currently available to those families where one or other parent is a victim of abuse by their child.**
  - iii. That Cabinet note that families where one or other parent is a victim of abuse by their child are currently viewed and have the same stigma as victims of Domestic Violence did fifteen or so years ago. The Working Group asks that we address this matter in a more timely way with a robust action plan.**
  - iv. That Cabinet support the inclusion of information relating to services available for families where one or other parent is a victim of abuse by their child in the Council's *Directory of National and Local Agencies and Help Lines* for victims of Domestic Violence and Transition Services.**

**Reasons for decision**

Cabinet endorsed the recommendations aimed at building upon the current support given by the Council and partner agencies to families suffering parent abuse.

Cabinet agreed that an improved and more joined up service would contribute to improvements in residents' health, wellbeing and safety.

**Alternative options considered and rejected**

The Cabinet could have decided to reject or amend one or more of the Working Group's recommendations.

**Officer to action:**

Nikki Stubbs, Democratic Services

**166. DISABLED PEOPLE'S PLAN 2009-2012**

*Cabinet requested a further update on the Plan at its July 2010 meeting.*

**RESOLVED:**

**That Cabinet notes the progress on the delivery of the 2009/10 Disabled People's Plan.**

**Reason for decision**

Cabinet noted progress on the the Disabled People's Plan which sought to address some of the challenges facing disabled people of all ages in Hillingdon by identifying what the council can do directly, or through its influence with others, to improve the lives of disabled people and to maximise their health and wellbeing.

**Alternative options considered and rejected**

Cabinet considered no alternative options.

**Officer to action:**

*Gary Collier, Adult Social Care, Health and Housing*

**167. LOCAL AREA AGREEMENT 2008 - SECOND ANNUAL REFRESH**

**RESOLVED:**

**That Cabinet agree the refreshed Local Area Agreement 2008-11**

**Reasons for decision**

Cabinet noted that the Council had a legal duty to prepare a Local Area Agreement that would be subject to annual refresh according to guidance published by the Secretary of State. As part of the 2nd annual refresh process, Cabinet amended one reward target.

## **Alternative options considered and rejected**

Cabinet could have decided not to confirm any of the targets included within the Local Area Agreement.

### **Officer to action:**

*Ian Edwards, Deputy Chief Executive's Office*

## **168. LOCALITIES, ENFORCEMENT AND TRANSPORT IMPLEMENTATION - UPDATE**

### **RESOLVED:**

#### **That Cabinet agree:**

- 1. That the Core functions outlined in paragraph 6.4 be included in the scope of the detailed implementation of proposed structures to deliver Localities & Enforcement services as one block of services in a Communities related Directorate.**
- 2. That the legal elements of enforcement services included in paragraph 6.4 are stripped out during the detailed design stage and transferred to the DCEO's**
- 3. That an Integrated Transport Unit be set up in the centre of the Council including the core functions set out in paragraph 6.5.**
- 4. That all the proposed new structures be effective from June 2010.**
- 5. That Officers be authorised to start recruitment/redeployment to a Corporate Director post to head up a new Communities based Directorate.**
- 6. To instruct the Chief Executive to ensure that, during the pre-implementation phase, his views will take priority in any dispute with service departments.**
- 7. To instruct Officers to start formal consultation on the proposals outlined in this report.**

#### **Reasons for decision**

Cabinet noted that Hillingdon had an excellent record in driving efficiencies through business improvement and that the Business Improvement Delivery programme (BID) had been designed to ensure that the Council became even more streamlined, flexible and less bureaucratic and had the ability to free up front line staff to focus on delivering excellent services to residents.

Cabinet recalled that back in January 2010, it agreed to integrate and develop the Localities, Enforcement and Transport projects fully as part of the BID programme along with the timescales for the project.

With detailed proposals now presented to them, Cabinet therefore agreed the scope and implementation of the new Localities, Enforcement and Transport functions and noted they had been tested against the Council's Operating Model to ensure that the

wider reorganisation would provide the most effective and efficient delivery model for these key Council functions.

### **Alternative options considered and rejected**

Cabinet decided not to maintain the status quo. It agreed that there was an urgent need to make significant efficiency savings through the BID programme over the next 3 years and that radical options involving the application of a new operating model were necessary in order to make services more resident focused.

### **Urgency Provisions**

*This report had been circulated less than 5 working days before the Cabinet meeting and was agreed by the Chairman to be considered as urgent.*

### **Scrutiny call-in waived**

*This decision was deemed urgent by the Cabinet. In accordance with the Policy Overview and Scrutiny Procedure Rules in the Constitution (with the agreement off the Chairman of the Executive Scrutiny Committee and Chief Executive) the call-in rules on this particular item and decisions were waived. These Cabinet decisions therefore came into immediate effect.*

### **Officer to action:**

Hugh Dunnachie, Chief Executive

## **169. COUNCIL BUDGET - MONTH 11 2009/10 REVENUE AND CAPITAL MONITORING**

### **RESOLVED:**

#### **That Cabinet:**

- 1. Notes the forecast budget position for revenue and capital as at Month 11.**
- 2. Approves a grant of £45k to P3 to fund further work to help young people in the Borough to be funded from 2009/10 unallocated priority growth.**
- 3. Notes the treasury management update in Appendix B.**

### **Reasons for Decision**

The reason for the monitoring recommendation was to ensure the Council achieved its budgetary objectives. The report informed Cabinet of the latest forecast revenue and capital position for the current year 2009/10. Cabinet also agreed to provide additional funding to the P3 young people's project.

### **Alternative options considered and rejected**

There were no other options considered.

## **Urgency Provisions**

*This report had been circulated less than 5 working days before the Cabinet meeting and was agreed by the Chairman to be considered as urgent.*

### **Officer to action:**

*Paul Whaymand, Finance and Resources*

## **170. FITTING OUT OF THE FIRST FLOOR OF MERRIFIELDS HOUSE, BURNS CLOSE, HAYES FOR USE AS A RESPITE CARE FACILITY FOR CHILDREN**

### **RESOLVED:**

**That Cabinet accept the tender submitted by Cardy Construction Ltd. in the sum of £356,133.00 which officers consider offers the Council best value.**

### **Reasons for decision**

Cabinet agreed that the development of the Merrifields Residential Unit would support the re-design of services for Disabled Children in Hillingdon, specifically, the implementation of the Disabled Children Resource Service.

### **Alternative options considered and rejected**

Cabinet could have not accepted the tender, in which case the project would not have been able to proceed.

### **Exempt Information**

*This report was included in Part II as it contained information relating to the financial or business affairs of any particular person (including the Authority holding that information) and the public interest in withholding the information outweighed the public interest in disclosing it (exempt information under paragraph 3 of Part 1 of Schedule 12A to the Local Government (Access to Information) Act 1985 as amended).*

### **Officer to action:**

*Eileen Nicholson, Major Construction Projects, Planning & Community Services*

**171. APPOINTMENT OF CONTRACTOR FOR THE REDEVELOPMENT OF TRISCOTT HOUSE**

**RESOLVED:**

- 1. That the Cabinet agrees to award the construction contract (using the JCT 2005 form of contract, with contractor's design) for the redevelopment of Triscott House to Breyer Group PLC at a contract sum of £6,104,912.**
- 2. That the Cabinet notes the following:**
  - a) That the on-costs for this project are £986,633, of which £258,377 relates to the appointment of external contractors for the provision of architects, employers agent, planning and site surveys.**
  - b) In October 2009 Cabinet gave approval to the expenditure of £150,700 of which £125,000 has been spent to date.**
  - c) A capital release report has been submitted for consideration by the Leader and Cabinet Member for Finance and Resources requesting approval of the remaining expenditure relating to the on-costs.**
  - d) Any further appointment of external consultants will be conducted in accordance with Council Standing Orders and Cabinet or Cabinet Member approval will be sought where required.**
  - e) The internal on-costs for this project are £728,256 as detailed below and these will be capitalised where appropriate.**
- 3. That the Cabinet agrees to a contingency sum of £353,538 being made available to the project.**

**Reasons for decision**

Cabinet agreed that the tender submitted by Breyer Group PLC was the most economically advantageous to carry out the construction works at Triscott House. By doing so, this allowed the Council to confirm the allocation of £4,170,028 in capital grant from the Homes and Communities Agency (HCA). Cabinet also agreed the necessary fees and contingency required to progress the project.

**Alternative options considered and rejected**

Cabinet could have accepted an alternative tender or no tender at all, in which case either value for money would not have been achieved or grant funding could be withdrawn.

**Officer to action:**

*Mazhar Ali, Adult Social Care, Health and Housing*

## **Exempt Information**

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### **172. TEMPORARY WORKER AGENCY CONTRACT - PROFESSIONAL, TECHNICAL AND ADMINISTRATIVE**

#### **RESOLVED:**

**That Cabinet approve the award of a new contract to *Matrix SCM Limited* for the sole provision of Professional, Technical and Administrative temporary worker, subject to final formal sign-off by the Cabinet Member for Finance and Business Services.**

#### **Reasons for decision**

Subject to further final formal approval by the Cabinet Member for Finance and Business Services, Cabinet agreed it would secure professional, technical and administrative temporary workers through a single agency, Matrix SCM, presenting best value following an e-auction procurement exercise.

#### **Alternative options considered and rejected**

Cabinet could have made an outright decision at the meeting or approved no tender at all. Instead, Cabinet sought further clarification on the tender and therefore delegated to the Cabinet Member for Finance and Business Services to make a final decision on the matter.

#### **Officer to action:**

Mike Talbot, Deputy Chief Executive's Office

## **Exempt Information**

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## **173. MULTI-FUNCTION PRINT DEVICES**

### **RECOMMENDATION**

**That Cabinet:**

- 1. Approve the award of a 5-year contract to Canon UK Ltd for the supply of Multi-function devices to the Council.**
- 2. Endorse the modern working practices identified below, including the centralisation of all Civic Centre office printing and photocopying budgets.**

### **Reason for decision**

Cabinet approved the award of the contract in order to create cost savings, efficiency improvements and to make a significant contribution to the council's environmental agenda by reducing staff's reliance on paper documentation in the future.

### **Alternative options considered and rejected**

Cabinet could have agreed not to award a contract.

### **Officer to action:**

*Steve Palmer, Finance and Resources*

### **Exempt Information**

*This report was included in Part II as it contained information relating to the financial or business affairs of any particular person (including the Authority holding that information) and the public interest in withholding the information outweighed the public interest in disclosing it (exempt information under paragraph 3 of Part 1 of Schedule 12A to the Local Government (Access to Information) Act 1985 as amended).*

## **174. LEASE OF FIRST FLOOR PREMISES, YIEWSLEY LIBRARY**

### **RESOLVED:**

**That the Cabinet:**

- 1. Grants a sublease of first floor premises above Yiewsley Library on the terms included within the report and;**
- 2. Withdraws the exempt nature of relevant parts of the report solely for the Council to use to provide public information about this matter and related purposes.**

## **Reasons for decision**

Cabinet agreed the grant of a sublease for the first floor premises above Yiewsley library. Cabinet was pleased that this decision helped move forward plans by the Council to build a brand new health centre for local residents on the site of the Yiewsley Swimming Pool which was scheduled to close during the summer.

## **Alternative options considered and rejected**

Cabinet could have refused to grant the sublease or considered alternative occupiers, either from within the Council or externally.

## **Officer to action:**

*Mike Paterson, Planning and Community Services*

## **Exempt Information**

*This report was included in Part II as it contained information relating to the financial or business affairs of any particular person (including the Authority holding that information) and the public interest in withholding the information outweighed the public interest in disclosing it (exempt information under paragraph 3 of Part 1 of Schedule 12A to the Local Government (Access to Information) Act 1985 as amended.*

## **Urgency Provisions**

*This report had been circulated less than 5 working days before the Cabinet meeting and was agreed by the Chairman to be considered as urgent.*

## **175. OTHER ITEMS WHICH THE CHAIRMAN DECIDES ARE RELEVANT OR URGENT**

None.

**The meeting closed at 7.25pm**

## **DECISION AUTHORITY**

**With the exception of the decisions made by the Cabinet on item 8 (minute 168), the remaining decisions do not come into effect until Friday 23 April 2010.**

## EDUCATION & CHILDREN'S SERVICES POLICY OVERVIEW COMMITTEE MAJOR REVIEW:

### *HOW THE COUNCIL WORKS WITH PARTNER AGENCIES TO PROVIDE SAFEGUARDING FOR CHILDREN AT HEATHROW AIRPORT AS A PORT OF ENTRY*

<b>Cabinet Member</b>	Councillor David Simmonds
<b>Cabinet Portfolio</b>	Education and Children's Services
<b>Officer Contact</b>	Natasha Dogra, Democratic Services
<b>Papers with report</b>	Major Review: Final Report

#### HEADLINE INFORMATION

<b>Purpose of report</b>	To receive the Education and Children's Services Policy Overview Committee's report providing recommendations which seek to build upon the Borough's approach, current arrangements and future plans for safeguarding children at Heathrow Airport.
<b>Contribution to our plans and strategies</b>	This report contributes to the Council's priorities for safeguarding children and young people throughout the Borough.
<b>Financial Cost</b>	There are no additional financial implications arising from this report.
<b>Relevant Policy Overview Committee</b>	Education and Children's Services Policy Overview Committee
<b>Ward(s) affected</b>	All.

#### RECOMMENDATIONS

That Cabinet:

1. Note that the Committee has commended the service and its performance.
2. Welcome the report from the Education and Children's Services Policy Overview Committee and note the general consensus it found in favour of improving the current arrangements and future plans for safeguarding children at Heathrow Airport; and
3. Endorses the following recommendations of the Policy Overview Committee report as ways to enhance current arrangements and future plans for safeguarding children at Heathrow Airport, as set out below:

## **POC Recommendations:**

The Committee recommend that:

- a.) A specialised training programme be developed for foster carers and residential staff who provide care for this group of vulnerable children; carers must be made aware of the dangers of those children who go missing after being placed in their care. Safeguarding issues must be explained clearly and carers should be made fully aware of the issue of traffickers who contact children after they have been placed in their care.
- b.) Officer inspections take place at the foster homes of trafficked children – this can be performed through supervising social worker visits to foster carers to review the safeguarding arrangements.
- c.) The communication link between partner agencies and inter agency working be developed further through the work of the Trafficking Sub Group of the Hillingdon Safeguarding Children's Board and that national and international links be further developed and strengthened.
- d.) Cabinet invite the Education and Children's Services Policy Overview Committee to review the council's approach to safeguarding trafficked children, should national policy and/or legislation be modified, so that Cabinet are kept fully aware of national policy changes that could impact on our policies and resources and therefore compromise the Council's safeguarding arrangements.
- e.) Information of missing children to be regularly monitored by the Education and Children's Services Policy Overview Committee and that all instances of missing children reported to the Hillingdon's Safeguarding Children Board will be used to form part of future Safeguarding reporting arrangements to the Education and Children's Services policy Overview Committee.

## **INFORMATION**

### **Reasons for recommendation**

The recommendations are aimed at building upon Hillingdon's approach current arrangements and future plans for safeguarding children at Heathrow Airport.

### **Alternative options considered / risk management**

The Cabinet could decide to reject or amend the Committee's recommendations.

### **Supporting Information**

1. The Committee chose to review the current arrangements and future plans for safeguarding children at Heathrow Airport as a port of entry as a review topic in 2009/10 to enable the Council to build on its successes so far.
2. The aim of this review was to look at ways to improve the service and the arrangements for encouraging communication between all partner agencies involved in the battle against child trafficking and the safeguarding of trafficked children. The reasons behind why the Council

needs to develop its safeguarding arrangement were identified, including the potential benefits and drawbacks. Opportunities to enhance the services were investigated and were considered when producing the recommendations.

3. The review took place between January 2010 and April 2010.
4. The Committee's report (attached) gives full details of the review.

### **Officer Comments:**

Education and Children's Services Officers were fully involved in this review and support the work of the Committee and the recommendations which can be implemented within existing resources. Officers provided the Committee with the following comments regarding the progression of each recommendation:

- **Recommendation A** - A training workshop has been commissioned and will be in place by October 2010.
- **Recommendation B** – Supervised social worker visits to the foster homes of children who may be vulnerable to exploitation will ensure that foster carers are fully aware of issues relating to safeguarding children and are appropriately supported.
- **Recommendation C** - Communication is a regular item on the Trafficking Sub Group of the Hillingdon Safeguarding Children's Board. Agencies represented on the sub group aim to ensure that national and international links are further developed.
- **Recommendation D** - Officers will provide the Education and Children's Services Overview Committee with regular update reports. Regular updates will ensure the Committee are informed of all relevant legislative and policy changes that could have an impact on policies and resources in order to assure the Council's safeguarding arrangements.
- **Recommendation E** - The Safeguarding information that is reported to Education and Children's Services policy Overview Committee will in future include instances of children missing as reported to Hillingdon's Safeguarding Children Board.

### **Financial Implications**

There are no direct financial implications arising from this report. The recommendations can be implemented using existing resources.

### **EFFECT ON RESIDENTS, SERVICE USERS & COMMUNITIES**

#### **What will be the effect of the recommendation?**

The Committee's recommendations will provide a springboard for the Council to take those steps necessary to improve services used to safeguard children and young people.

#### **Consultation Carried Out or Required**

The Committee took evidence from residents, officers and experts as described in the attached report.

## **CORPORATE IMPLICATIONS**

### **Corporate Finance**

Corporate Finance has reviewed this report and is satisfied that there are no direct financial implications arising from the report and that the recommendations can be implemented within existing budgets.

### **Legal**

The Council has child protection duties under part III Children Act 1989 (amended) and Part 2 & 5 Children Act 2004 to safeguard protect and promote the welfare of all children within the area of the local authority. The report reviews the arrangements made by the Council to fulfil its safeguarding duties to children and young people at Heathrow Airport.

## **BACKGROUND PAPERS**

NIL



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## Education & Children's Services Policy Overview Committee 2010

### **A Review of how the Council works with partner agencies to provide safeguarding for children at Heathrow Airport as a port of entry**

#### Members of the Committee:

Cllr Catherine Dann (Chairman)  
Cllr Brian Crowe (Vice Chairman)  
Cllr Judith Cooper  
Cllr Peter Curling  
Cllr John Hensley  
Cllr Anita MacDonald (Labour Lead)



#### Other Voting Representatives for Education Issues:

Anthony Little - Roman Catholic Diocesan Representative



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# **Reviewing current arrangements and future plans for safeguarding children at Heathrow Airport as a port of entry**

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## **CHAIRMAN'S FOREWORD**



*Child trafficking is a very important and sensitive topic, addressing the interests of innocent young children. Following the devastating earthquake in Haiti this year which has left numerous children orphaned, I believe this review to be very timely and therefore I am very grateful to have been given the opportunity to review how Hillingdon is leading the way in tackling a global issue which transcends international borders*

*Although the number of trafficked children coming through Heathrow Airport has decreased in recent years it remains the duty of the Council to continue to keep these numbers as low as possible. The Committee hope that their review recommendations will be endorsed to minimise the prospect of child trafficking via Heathrow Airport as a port of entry.*

*The evidence and insight presented by each witness into the services tackling this difficult yet subversive matter allowed the Committee to understand the delicacy of the situation. The Committee and I are grateful to each and every person who took the time to attend Committee meetings. Therefore, on behalf of the Committee, I would like to thank the external witnesses and officers for participating in the review. We hope it can be used to make constructive improvements to tackling the issue of child trafficking.*

**Cllr Catherine Dann**

## **Setting The Scene**

### **What is child trafficking?**

Child trafficking is the movement of children for the purpose of exploitation. Trafficking can affect children of all ages although research indicates that the majority of victims in the UK are 12 years or older at the point of discovery (source: ECPAT). Throughout this report the term child will be used to describe anyone under the age of 18 as laid out in the United Nations Convention of the Rights of the Child.

*“Exploitation shall include at a minimum, the exploitation or the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs.”* – United Nations Protocol to Prevent, Suppress and Punish Trafficking of Persons, Especially Women and Children, Supplementing the UN Convention on Transnational Organised Crime 2000 (The Palermo Protocol). This is the internationally accepted definition of human trafficking adopted by the majority of countries across the world, including the UK.

The trafficking of children is a process made up of 3 distinct phases;

**Recruitment** - The recruitment phase can involve deception, coercion, violence or being sold to a third party. It can also involve the child going willingly with an adult because they believe they are going to a better life.

**Movement** - If the child is moved from one place to another person, then the child is a victim of trafficking. There is no requirement to prove physical threat or coercion to determine if the child has been trafficked. The movement of a child can occur across international borders or within one country.

**Exploitation** - Under international law it is accepted that a child cannot consent to his or her own exploitation and so even if a child agreed to travel from one place to another, this could still be considered human trafficking if there is the intent to exploit them along the way or at the final destination.

In the UK children are trafficked for sexual exploitation, domestic servitude, forced labour, including restaurant and catering work, manual labour, drug trafficking, begging, petty theft, benefit fraud, cultivation of cannabis and selling counterfeit goods such as DVDs. There is also evidence of children being brought to the UK for forced marriage and illegal adoption.

### **The role of the Council**

Heathrow Airport is the world's busiest international airport and it is situated in the London Borough of Hillingdon. Hillingdon Children and Families service have to deal with the complexities of safeguarding significant numbers of children and young people who arrive at this port of entry every year. The Children and Families Service have developed a specialist Referral and Assessment Service to address issues of child safeguarding and age disputes. Heathrow Airport is operational 24 hours a day; children and young people can be referred at anytime of day or night. Indeed statistical evidence demonstrates that over 90% are referred outside of the hours of 9.00 am and 5.00 pm Monday to Friday. It is also clear that each new arrival must have, in order to maximise safeguarding, a rapid and skilled service that is delivered immediately on referral. The dedicated airport intake team has enabled Hillingdon to provide a responsive service with its contacts from UK Border Agency UKBA at Heathrow's five terminals. It is a unique service amongst local government.

### **Overview of Safeguarding Arrangements**

Safeguarding of children arriving at Heathrow is a high priority for Hillingdon Local Safeguarding Children Board (LSCB) and the Child Trafficking Sub Group. Staff in Children's Services work very closely with partners including the police and immigration service in relation to safeguarding young people who may be victims of trafficking and/or other forms of exploitation. Staff in teams across the service have developed specialist skills in safeguarding children and young people who arrive from abroad. Out of hours referrals are managed by standby staff who are on call. Cases are transferred into the appropriate team by the next working day. All UASC (Unaccompanied Asylum

Seeking Child(ren)) cases are dealt with by the Council's Asylum Service. Non-USAC cases are dealt with by the Referral and Assessment Team. Each service area carries out all statutory and specialist assessments. These teams have developed skills in undertaking age assessments and assessments of children and young people who are believed to be the victims of trafficking. The Asylum Service has contributed to the development of the Trafficking Toolkit which is now being used nationally. The Toolkit provides a process and procedure for assisting with the identification, assessment and notification of children who may be at risk of being trafficked.

Trafficking is a complex issue however over the last two years Hillingdon has been working closely with UKBA and the policing agencies to disrupt the trafficking of children through Heathrow and put in place strategies to discourage young people from leaving the care of Hillingdon children's services. This has led to a reduction of young people who have gone missing and the number who have been returned has increased:

- 2006/07 251 total children, 70 went missing
- 2007/08 221 total children, 54 went missing
- 2008/09 160 total children, 20 went missing

(source: ECPAT UK)

In 2008, Hillingdon faced a particular challenge in relation to Chinese young people going missing soon after arrival. Due to strategies implemented and intelligence employed this pattern has been severely disrupted and there has been a significant reduction in the arrival rate and numbers of Chinese young people going missing.

The ability to respond rapidly and identify potential victims of trafficking at the earliest possible opportunity after arrival has also had a positive effect in relation to our work in identifying vulnerable children and young people and the numbers going missing.

However, the profile of trafficked children and young people is subject to frequent change and does not apply to only one nationality. Communication between all services has increased through the recently implemented fortnightly Trafficking Operational Group. This sharing of information led to rapid identification of common factors in the stories and profile of those presenting, sharing of information and intelligence and co-operation leading to both identifying potential victims and potentially disrupting organised crime.

### **Key Issues**

- Hillingdon has active protocols with multi-agency organisations to combat Child Trafficking and prevent Missing Children at ports of entry. This Protocol includes fortnightly operational meetings held at the offices of UKBA to consider all children individually who have come to notice through the airport terminals. The terms of reference for this operational meeting stipulates core membership of the group, and includes all relevant key law enforcement agencies, such as the Metropolitan Police, [Paladin team], Borough Police and the Heathrow Intelligence Unit, as well as UKBA and Children's Social Care. This operational work is the first of its kind, and a model of best practice. The terms of reference for this group and the Protocols are being sought by ports of entry throughout the UK. Staff from Hillingdon have been to Manchester airport, Birmingham, Stansted and Gatwick to share best practice.
- The LCSB in Hillingdon has established a strong multi-agency sub group focused on child trafficking to lead policy and practice. Representation at this group includes not only local public and voluntary sector agencies but also includes National NGO's; National Society for the Prevention of Cruelty to Children (NSPCC), End Child Prostitution, Child Pornography and the Trafficking of Children (ECPAT), Child Exploitation and Online Protection Centre (CEOP) and Children First, as well as the Private Sector; British Airports Authority (BAA) and the Group 4 Securicor (G4S). This demonstrates that Hillingdon is influential on a national level and is taking a national lead with policy issues which affect points of entry.

- Hillingdon Child Trafficking leaflets have been developed in 10 different languages and are being rolled out to Ports of Entry across Europe. The leaflets are used to raise awareness of Child Trafficking and to explain the next steps for any young person who has fallen victim to Child Trafficking. The leaflets include important contact details of agencies used to support trafficked children and young people. One Example being Denmark, as Copenhagen is a transition airport for many children trafficked into the UK. These leaflets will also be included in the National Trafficking Toolkit, which is linked to the national referral mechanism administered by the United Kingdom Human Trafficking Centre (UKHTC).
- Hillingdon has developed a bespoke Stand by Service to provide a flexible and skilled professional response at the Airport terminals. A virtual team set up from experienced 'day time' staff who are available between 5pm and 9am, and also includes weekends, provides this service.
- Hillingdon's strong partnership working with UKBA and Policing Agencies, such as the Serious Organised Crime Agency (SOCA) and Scotland Yard has disrupted the trafficking of children through Heathrow Airport. This has resulted in both a significant reduction in the number arriving at Heathrow and the number of young people who have gone missing (chart 1)
- Statistical information demonstrates that the joined up approach described in this document has impacted upon the numbers of children and young people arriving. The trend in terms of those that go missing has been greatly reduced and the opportunity for law enforcement agencies to capture intelligence and take action against offenders has increased.
- The work has been recognised by the Office for Standards in Education, Children's Services and Skills (OFSTED), the Department for Children,

Schools and Families (DSCF) and the Home Office as a model for best practice particularly in the area of child trafficking.

<b>Table 1</b>			
<b>(Source: ECPAT UK)</b>			
<b>Missing Children and Young People Travelling to the UK through Heathrow Airport</b>			
<b>Ethnicity</b>	<b>2006/07</b>	<b>2007/08</b>	<b>2008/09</b>
Afghani	1	8	5
Albanian	1	2	0
Chinese	63	32	4
Congolese	1	1	0
Indian	1	6	6
Iranian	0	1	0
Iraqi	0	0	1
Nigerian	0	3	2
Palestinian	1	0	0
Somalian	1	1	1
Syrian	1	0	0
Vietnamese	0	0	1
<b>Total</b>	<b>70</b>	<b>54</b>	<b>20</b>

Table 1 above illustrates the steady decline in the number of children and young people going missing from 2006 to 2009. During 2006/07 the number of Chinese youths going missing was 63. This number decreased to just 4 during 2008/09.

All Unaccompanied Asylum Seeking Children under 16 years of age are placed in foster care with few placed in our specialist residential unit on arrival.

## **Accommodation for Unaccompanied Asylum Seeking Children**

All unaccompanied asylum seeking children are placed into accommodation which is shared with Looked After Children. The Service provides a range of semi-independent and shared accommodation for all Looked After Children. The accommodation is of a high standard and in addition to young people having allocated workers the service commissions a range of outreach support via Notting Hill Housing Group and a voluntary organisation - Aphelia.

### **16-18 year olds**

A 47 room supported unit providing self-contained units and including 3 emergency rooms for newly arrived young people and a 26 room unit and 1 disability room are staffed and of a very high specification and standard.

### **Mother & Baby Accommodation**

There are 5 shared houses and a further 20 flats/bed sits for sole occupancy for any mother and baby occupancy.

### **18+ Accommodation**

90 shared houses with 350 rooms are available for young people of ages 18+.

### **Well-being Project (WBP)**

The WBP project is a mental health service for unaccompanied asylum seeking young people. A range of mental health services are offered to looked-after unaccompanied asylum seeking young people who might suffer from moderate to severe psychological adjustment difficulties upon arrival to the UK, or persistent emotional problems. The service covers the geographical area of the borough of Hillingdon. The WBP officers consultation and training to agencies working with the young people and mental health assessment and therapeutic intervention for the young people such as individual interventions, group work, e.g. life skills programme, memory box / orientation group, transition group, healthy eating cooking group. The delivery team consists of: a team coordinator and systemic psychotherapist, a

consultant child and adolescent psychiatrist, two primary mental health workers and a youth worker

### **Local, National and International Policy Context**

A number of International agreements and legal instruments relevant to trafficked and exploited children and seek to minimize or outlaw the problem:

- ⑥ The Declaration and Agenda for Action agreed at the First World Congress on the Commercial Sexual Exploitation of Children (Stockholm, 1996).
- ⑥ The United Nations Convention on the Rights of the Child (United Nations, 1989), its Optional Protocol on the Sale of Children, Child Prostitution and Child Pornography (2000) and the Optional Protocol on the Involvement on Children in Armed Conflict (2000).
- ⑥ The Protocol to Prevent, Suppress and Punish Trafficking in Persons, especially Women and Children, Supplementing the United Nations Convention against Transnational Organised Crime (2000). The Protocol defines trafficking as: *“The recruitment, transportation, transfer, harbouring or receipt of a child for the purpose of exploitation shall be considered ‘trafficking in persons’ even if this does not involve any of the means set forth.”*
- ⑥ International Labour Organisation (ILO) Convention 182 concerning the Elimination of the Worst Forms of Child Labour (2000).
- ⑥ The Yokohama Global Commitment agreed at the Second World Congress on the Commercial Sexual Exploitation of Children (Yokohama, 2001).
- ⑥ Council of Europe Convention on Action against Trafficking in Human Beings (2005).

### **National Policies:**

UK Legislation and guidance relevant to trafficked and exploited children includes:

- The Children Act 1989.
- Safeguarding Children Involved in Prostitution (2000) (currently being revised).
- The Nationality, Immigration and Asylum Act 2002
- Adoption and Children Act 2002.

- The Sexual Offences Act 2003.
- The Children Act 2004.
- The Asylum and Immigration (Treatment of Claimants etc) Act 2004.
- Working Together to Safeguard Children (2006).
- What to do if you're worried a child is being abused (2006).
- ⑥ The UK Action Plan on Tackling Human Trafficking (2007).

### **Local Polices**

- Children and Young Peoples Plan
- Hillingdon Local Safeguarding Children's Board

## **THE REVIEW**

### **Reasons for the Review**

The topic of Child Trafficking was highlighted as one of high importance by the Committee. With the safeguarding of all children being a recent media focal point and with Heathrow Airport situated in the borough, Members decided that reviewing this topic would be timely and appropriate.

The Committee took this opportunity to develop recommendations to be provided to Cabinet in support of the Council's efforts to further support the development safeguarding duties with regard to young people who arrive unaccompanied, bringing together all the key aspects and necessary information to advance the service.

### **Aim of the Review**

To review the statutory safeguarding duties of the Council and other agencies with regard to young people who arrive unaccompanied and to review current practice.

### **Terms of Reference**

1. To learn more about the world and dangers of Child Trafficking;
2. To understand how we safeguard newly arrived vulnerable children and young people, including assessment and intervention;
3. To understand the role of key agencies and seek assistance on the effectiveness of partnership working;
4. To investigate if there are further developments to best practice which can enhance current services to promote safeguarding and reduce the risk of trafficking;
5. To examine best practice elsewhere through case studies, policy ideas, witness sessions and visits;
6. After due consideration of the above, to bring forward positive and practical policy recommendations to the Cabinet in relations to the Council's approach to Child Trafficking in Hillingdon.

## **METHODOLOGY**

As part of their review, the Policy Overview Committee received reports, presentations and heard from witnesses.

Meetings held in January, February, March and April 2010 involved taking evidence from a range of witnesses:

- Amanda Reid, UK Border Agency, Heathrow Operations
- Detective Inspector Gordon Valentine, Metropolitan Police
- Jane Graver, Head of Care, Respite Unit
- Richard Nash, Manager, Children & Families Team, LBH
- Paula Neil, Manager of Asylum Team, LBH
- Debbie Haith, Head of Safeguarding, LBH

The Committee sought to gain information on the following issues:

- How far does the existing provision meet the needs of this group of children?
- Are there any particular pressures / issues affecting Hillingdon?
- What are the strengths and weaknesses of current approaches?
- What changes can be made in Hillingdon?
- How should agencies work more effectively together to address the issues facing the safeguarding of children?
- Are there any particular issues in Hillingdon affecting good safeguarding practice?

The findings from this review are presented in the following section of this report.

## **EVIDENCE & FINDINGS**

The following evidence was gathered at the witness sessions, which took place at the Committee meetings in January, February, March and April 2010.

### **Statistics**

- 2006/07 251 arrivals of which 28% (70) went missing
- 2007/08 221 arrivals of which 24% (54) went missing
- 2008/09 160 arrivals of which 13% (20) went missing
- 2009 to date 184 arrivals of which 4% (7) have gone missing.

In 2006/7 a significant number of young people went missing, a large proportion of who were from a Chinese background. This was largely due to an uncoordinated approach from the multi-agencies involved in the process of safeguarding at the port of entry; UKBA, Met Police and LBH.

During the latter part of 2008 a major break through occurred when a Chinese female who had previously absconded from a borough respite unit returned. She had been held against her will and prostituted. She assisted in delivering key messages to new arrivals about what may happen to them should they abscond. This together with arrests made outside of the UK by UKBA significantly disrupted the trafficking of Chinese nationals through Heathrow.

### **Interagency Coordination**

Immigration was the first point of contact with the trafficked child. The Asylum Team worked very closely with Immigration at the Heathrow Port of Entry due to the need to provide intense support to the children in the first few days after arrival. The level of support available out-of-hours had also increased due to a larger capacity of staff available to respond to children arriving at Heathrow Airport.

The Paladin team at Heathrow was a joint unit of Metropolitan Police Officers and UK Border Agency staff with immigration backgrounds and their remit

was to deal with all cases involving vulnerable children. These ranged from referrals from the front line, where there were child protection concerns to major criminal investigations involving child trafficking across borders.

The Paladin Team was the largest Child Abuse Investigatory Group in the world. The team worked closely with the Social Services teams in London Boroughs. Along with tackling child trafficking, the Paladin Team investigated child murders and child abuse. The biggest strength of the Paladin team was the number of police officers and UKBA officers involved in the team. The Paladin team also engaged outside bodies such as NSPCC, London Borough of Hillingdon and ACPO (Association of Chief Police Officers). ACPO investigated child trafficking with the help of other crime agencies.

In 2003, the Paladin Team provided the Home Office with 26 recommendations that, if adopted, would help tackle the problem of child trafficking. Every recommendation was agreed and put into practice.

The most effective way to tackle child trafficking would be by using a multi-agency response. The excellent communication links that had been created in the last few years had led to a significant reduction in the number of children going missing from the Heathrow Port of Entry.

The Heathrow Operations Team was involved in raising staff awareness of the problem of child trafficking and ensuring staff were confident enough to cope in a situation where suspected traffickers were confronted. The work of the team involved stopping any unaccompanied child under the age of 18, making enquiries to determine the reason of visit of the child and interviewing the child in a comfortable and suitable environment.

A visit by the then Prime Minister Tony Blair to T5 allowed the Heathrow Operations team to highlight the problem of child trafficking with the PM. Following his visit, an “unaccompanied by” visa was launched to be used by all children under the age of 18 and must state who the child was travelling

with and where to. Following this introduction, the number of children travelling alone reduced significantly.

The UKBA worked closely with airlines and airports that referred any suspicious behaviour to the UKBA. After a child was referred by the UKBA to LBH it was the safeguarding team's priority to ensure the safety of that child. The team also assisted agencies in preventing child trafficking by attending regular meetings and sub-groups.

Regular meetings took place between inter agencies and officers from other boroughs. This ensured that the problem was tackled laterally. The links that had been established between multi-agencies, councils and the police were commendable. Without these links, officers would not be able to tackle the problem of child trafficking.

### **Trends and Patterns**

The Asylum Team supported unaccompanied minors who ranged from under 16 year olds to 24 year olds. Many of these children were assessed as being victims of child trafficking and some pleaded asylum. The awareness around child trafficking had risen to a higher level and as a result the London Borough of Hillingdon was very proactive in their response to this activity. The level of understanding around child trafficking and the level of support available had developed significantly in the last few years. For example, it had been noted that profiles and patterns between trafficked children varied according to the differing ethnicities of the children.

### **Residential Units**

Staff at respite units worked very closely with the child to ensure that they were as comfortable as possible. Staff understood that the child would be frightened of their new surroundings and therefore treated the child with respect and care. The child was made to feel safe, but most children appeared withdrawn and traumatised at first.

Children were monitored at all times and accompanied in and around the centre. The profiling of the children allowed trends to be established, which led to fake stories being picked up early on. Children were usually told what to say by their traffickers and therefore it was difficult for staff to unveil the truth about their origin and purpose of their visit.

A significant number of trafficked children are female. Witnesses said that some of these females are pregnant on arrival and appropriate accommodation and support is provided for them.

Most children were afraid of returning home due to unpaid fees to traffickers. Children had been bought here on a promise of a better life and therefore did not want to return home. However, some children agreed to 'voluntary removal' and were returned home where it was possible and safe to return home.

Residential units had classrooms where children could be taught and a library where the children could further their knowledge. The cooks in the units were very creative and tried to involve the children as much as possible. Medical issues were dealt with very seriously and each child was screened for any medical issues relating to their country of origin. Children were assessed and only then allowed out of the centre alone, for example to travel to college. The units were funded by central government and the UKBA asylum grant.

Due to a combination of increased education around child trafficking and improved communication between immigration, the police and the Asylum Service and Referral & Assessment Teams, the information about each child was shared at fortnightly meetings. This allowed better intelligence, better sharing of information and less disruption of the assessment period when the child arrived. This in turn led to a reduction in the number of children going missing from respite units, as their needs were anticipated and patterns were developed which were flagged up by staff to ensure certain children were monitored very closely.

### **Aid from Country of Origin**

It was apparent that there was a lack of support from the child's country of origin. It was possible for immigration to track down the route of the child, but the route was usually extremely long-winded and had taken months to complete. Therefore, Embassies of other countries were reluctant to help as it was difficult to prove that the child was there and the purpose of the child's visit. Nevertheless, the Country of Origin was not important when protecting a trafficked child. A child coming in from the Far East was treated in the same way as a child coming in from the EU.

### **Areas Requiring Further Development**

The London Borough of Hillingdon had done very well in developing the standard of the asylum service and the safeguarding of trafficked children. The development of the provision of resources had also helped this process. One area which needed developing was the level of training and support available for foster carers. Foster carers needed to be trained on the risks involved when a child tries to escape and how to monitor the child when they cannot be cared for by the carer. More support was needed in the early days following the fostering of a child. Witnesses informed the Committee that foster carers got an initial briefing but were not specifically trained in caring for trafficked children. Specific skills were necessary when working with this group of children which needed to be developed.

### **Foster Care**

Private fostering was defined in section 66 of the Children Act 1989. A private fostering arrangement arose when a child under 16 years (or under 18 if disabled) was to reside for more than 28 days in the care of someone who was not a parent, close relative, or someone with parental responsibility (these close relatives were defined by the Act as grandparents, brother, sister, uncle or aunt whether of the full blood or half blood or by marriage or civil partnership or step-parent). Parents and private foster carers were required to notify the local authority of a private fostering arrangement. A person who proposed to foster a child privately must notify the appropriate local authority

of the proposal at least six weeks before the private fostering arrangement was to begin; or where the private fostering arrangement was to begin within six weeks, immediately.

Many private fostering arrangements were not notified to the local authority for a variety of reasons, not all of them associated with a risk of serious harm. Identifying a child who was privately fostered was not the same as identifying a child who has been trafficked. Nevertheless, some children in private fostering arrangements were vulnerable to being exploited in domestic servitude, other forms of forced labour, or even to sexual exploitation. It was difficult for practitioners to identify these children and, therefore, to track their movements and hence monitor their welfare. However, it was important to consider whether a carer, whether or not they present as a relative, was maintaining a private fostering arrangement in order to exploit a child for their own gain. Staff or volunteers in an agency who believed that a child may be privately fostered, whether or not they have suspicions or concerns about trafficking or other forms of abuse, should contact local authority children's social care.

Local authorities had the following statutory duties in relation to private fostering:

- identify private fostering arrangements;
  - visit the home and assess the suitability of the arrangement in terms of the child's welfare; and
  - visit the child regularly, and monitor and keep records of the placement.
- Such enquiries should help practitioners be alert to signs that the child is being exploited.

### **Media Interest**

The timeliness and importance of an exceptionally topical subject was addressed by local press in a borough-wide newspaper article following a useful witness session (Appendix A).

## **CONCLUSIONS AND RECOMMENDATIONS**

**The Committee reviewed the duties, functions, performance of and services providing safeguarding for children at Heathrow Airport as a port of entry. Taking into account user and professional experience, below is a summary of the Committee's conclusions.**

### **The Committee conclude:**

1. The Committee would like to commend the current ways in which the Council is working with partner agencies to provide safeguarding for children at Heathrow Airport.
2. There is a need for better interagency communication. This would allow different agencies to share expertise, best practise and information regarding emerging trends and patterns. In turn, this information could be used to tackle the issue with a better foundation of knowledge about the problem and the results should echo this improvement.
3. Training for foster carers needs to be developed. The Local Authority needs to ensure that carers are best suited for the task at hand and were fully capable of caring for a child.
4. There is a desirability of cooperation, involvement and support from embassies from those countries where children are being trafficked to enable better communication links and through inter-nation effort, help confront the problem of child trafficking. The London Borough of Hillingdon had recently worked in coalition with an international embassy to crackdown on the number of children being trafficked from that country into the UK, which led to a dramatic decline in the levels of trafficked children entering the UK.

Following this evidence, we therefore recommend that the Council develop the way in which it works with partner agencies to provide safeguarding for

children at Heathrow Airport as a port of entry provision in accordance with the following recommendations to be approved by Cabinet.

### **RECOMMENDATIONS**

Following the review of how the Council works with partner agencies to provide safeguarding for children at Heathrow Airport as a port of entry the Committee would like to bring the following key points to the attention of Cabinet:

**That Cabinet consider the following proposals to improve and develop the services which provide safeguarding for children trafficked through Heathrow Airport.**

**The Committee recommend that:**

- a.) A specialised training programme to be developed for foster carers and residential staff who provide care for this group of vulnerable children; carers must be made aware of the dangers of those children who go missing after being placed in their care. Safeguarding issues must be explained clearly through a specialised training programme; carers should be made fully aware of the issue of traffickers who contact children after they have been placed in their care.**
  
- b.) Inspections to take place at foster homes by officers – this can be performed through supervising social worker visits to foster carers to review the safeguarding arrangements.**
  
- c.) The communication link between partner agencies and inter agency working be developed further through the work of the Trafficking Sub Group of the Hillingdon Safeguarding Children’s Board and that national and international links be further developed and**

**strengthened.**

- d.) Cabinet to invite the Education and Children's Services Policy Overview Committee to review the council's approach to safeguarding trafficked children, should national policy and/or legislation be modified, so that Cabinet are kept fully aware of national policy changes that could impact on our policies and resources and therefore compromise the Council's safeguarding arrangements.**
  
- e.) Information of missing children to be regularly monitored by the Education and Children's Services Policy Overview Committee and that all instances of missing children reported to the Hillingdon's Safeguarding Children Board will be used to form part of future Safeguarding reporting arrangements to the Education and Children's Services policy Overview Committee.**

>>> HOW SHOULD THE GOVERNMENT TACKLE THE ISSUE OF ASYLUM  
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# The battle to smash child trafficking

The final stages of an inquiry into child trafficking were held at Hillingdon Civic Centre this week. Reporter **DAN COMBS** found out what Hillingdon Council is doing to help the children who come into its care, and how it worked to smash an international people smuggling ring

**T**HE issue of child trafficking is a truly global problem – and this borough finds itself on the front line. Because it includes Heathrow Airport, Hillingdon Council is the 'port authority' responsible for the welfare of all unaccompanied under-18s who arrive at the airport.

Although the council has been involved in wrangles with Whitehall over the grant it receives to deal with the problem, much more serious is the fact that, since 2006, 144 of 732 unaccompanied minors have absconded.

The statistics are telling: 70 of the 144 disappeared between 2006 and 2007, and 63 of those children were Chinese. It was clear an international criminal gang was at work at that time.

Since then, huge strides have been made by immigration and border agencies and Hillingdon Council's care providers. Between 2007 and last year, the number of young people absconding from care was about the same as the single year figure for 2006/7.

To understand how a child can slip

through the cracks it is necessary to see what occurs when they first arrive.

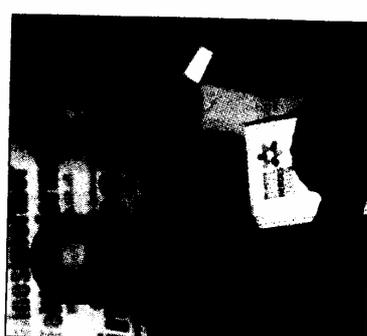
Heathrow is a 24-hour airport and there is no respite from arrivals. Statistics show 90 per cent of unaccompanied children and young people touch down outside the hours of 9am-5pm.

Therefore a dedicated care team from Hillingdon is on call around the clock to respond rapidly if they receive a call from the UK Border Agency (UKBA) telling them a child in need has arrived.

Not every unaccompanied child is a victim of trafficking; many arrive genuinely to claim asylum. It is the job of UKBA to determine the specifics of each case, while Hillingdon's teams are needed to safeguard the welfare of the child, irrespective of the circumstances.

Speaking to councillors at last Thursday's policy overview meeting were Jane Graver, head of care at a residential home in the borough, and Paula Neil, the home manager.

Ms Graver said: "When a child arrives at Heathrow, immigration is their first point of contact and we work closely with the staff. We need to place the child immediately.



**■ SUCCESS STORY: Former asylum seeker Akhtar Jan receives his Citizen of Courage award from Uxbridge College principal Laraine Smith** File

"We are there to offer support, especially in the first few days and weeks of their arrival, when they most need it. We are informed if the child may be high risk, and we do our own risk assessment. If they come with a phone, we may detain it."

This is because a child who is a victim of trafficking would be contacted by phone to arrange a meeting, and they could be forced into working illegally, for example to pay off a debt.

Ms Neil explained how scared, disorientated children are taken under the wing of her staff. She said: "Our priority is making them feel comfortable. Our job is not to

## MISSING CHILDREN

2006/7 251 total children, 70 went missing  
2007/8 221 total children, 54 went missing  
2008/9 160 total children, 20 went missing

Nationality	2006/ 2007	2007/ 2008	2008/ 2009
Alghani	1	8	5
Albanian	1	2	0
Chinese	63	32	4
Congopese	1	1	0
Indian	1	6	6
Iranian	0	1	0
Iraqi	0	0	1
Nigerian	0	3	2
Palestinian	1	0	0
Somalian	1	1	1
Syrian	1	0	0
Vietnamese	0	0	1
<b>Total</b>	<b>70</b>	<b>54</b>	<b>20</b>

judge, ours is to provide care. "How they come into the country is predominantly UKBA's concern. But through talking with lots of the children we build up certain profiles.

For example, those from China often have similar stories and say the same things. In cases of trafficking this is because they are told what to say.

"This information we gain is fed back to immigration, and we now have fortnightly meetings and intelligence sharing, which is incredibly helpful."

Because of these strategies, the high number of Chinese children going missing from care has dropped from 63 in 2006/7 to just four last year.

Leaflets developed by the borough team in 10 different languages have been distributed across Europe.

As the asylum process takes so long, often more than a year, it is important the youngsters – a large proportion of whom are girls – live normal lives.

They cannot be locked up, so they are persuaded that to stay where they are is in their best interests.

Ms Neil said: "Even after a young person has stayed for several weeks you can never be sure as to their intentions."

"The stories they give as to their background may not be entirely accurate, and while a few actually decide they want to go back home and we have helped facilitate that, many are in fear as to what will happen if they do. However, on the whole the children are very compliant and stay around because they have access to education."

For every story of illegally trafficked children, there is a success story.

Recently the Gazette's Citizen of Courage award went to Akhtar Jan, now 23, who arrived unaccompanied at Heathrow aged 16, unable to speak English. Granted asylum, he went on to achieve A-level results good enough to gain him a place to study medicine at Queen Mary's University.

It is these stories of hope which give the borough's asylum care services inspiration.

● Now the final witness session into the council's unaccompanied child policy has been heard, a report and recommendations for improved practice will be compiled.

## Glossary of Terms

<b>ACPO</b>	Association of Chief Police Officers
<b>ARC</b>	Application Registration Card
<b>ASUs</b>	Asylum Screening Units
<b>BIA</b>	Border and Immigration Agency
<b>CAF</b>	Common Assessment Framework
<b>CAIU</b>	Child Abuse Investigation Unit
<b>CAMHS</b>	Child and Adolescent Mental Health Services
<b>CEOP</b>	Child Exploitation and Online Protection Centre
<b>CTN</b>	Coming To Notice
<b>CRB</b>	Criminal Records Bureau
<b>CROP</b>	Coalition for the Removal of Pimping
<b>CPS</b>	Crown Prosecution Service
<b>DCSF</b>	Department for Children, Schools and Families
<b>DH</b>	Department of Health
<b>ECPAT</b>	End Child Prostitution, Child Pornography and Trafficking of Children for Sexual Purposes UK
<b>GUM</b>	Genito-Urinary Medicine
<b>ILO</b>	International Labour Organisation
<b>LAC</b>	Looked After Child(ren)
<b>LSCB</b>	Local Safeguarding Children Board
<b>NASS</b>	National Asylum Support Services
<b>NRUC</b>	National Register for Unaccompanied Children
<b>NSPCC</b>	National Society for the Prevention of Cruelty to Children
<b>UAS</b>	Unaccompanied Asylum Seeker
<b>UASC</b>	Unaccompanied Asylum Seeking Child(ren)
<b>UKBA</b>	United Kingdom Border Agency
<b>UNICEF</b>	United Nations Children's Fund
<b>UKHTC</b>	United Kingdom Human Trafficking Centre
<b>YOT</b>	Youth Offending Team

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## RESIDENTS' & ENVIRONMENTAL SERVICES POLICY OVERVIEW COMMITTEE REVIEW:

### *ILLEGAL COSMETICS AND ILLEGALLY IMPORTED FOODS*

<b>Cabinet Member</b>	Councillor Sandra Jenkins
<b>Cabinet Portfolio</b>	Cabinet Member for Environment
<b>Officer Contact</b>	Nadia Williams, Deputy Chief Executive's Office
<b>Papers with report</b>	Residents' & Environmental Services Policy Overview Committee Review of Illegal Cosmetics and Illegally Imported Foods

### HEADLINE INFORMATION

<b>Purpose of report</b>	To receive the Residents' & Environmental Services Policy Overview Committee's report which sets out recommendations which seek to improve the arrangements for combating the issue of illegal cosmetics and food at Border Controls.
<b>Contribution to our plans and strategies</b>	This report contributes to the Council's priorities for creating a Safe Borough.
<b>Financial Cost</b>	Minor, contained within existing budgets.
<b>Relevant Policy Overview Committee</b>	Residents' & Environmental Services Policy Overview Committee
<b>Ward(s) affected</b>	All

### RECOMMENDATION

That Cabinet:

1. **Note that the Committee's recommendations are not the result of a comprehensive review, but recommendations designed to improve measures the Council has in place for combating the potentially dangerous issues of illegal cosmetics and illegally imported foods.**
2. **Welcome the report from the Residents' & Environmental Services Policy Overview Committee and endorse the recommendations which seek to enhance the measures already in place as set out below:**

## **Policy Overview Committee Recommendations:**

- a) **The Committee recognises the efforts made by Council and UK Border Agency (UKBA) Officers to tackle illegal goods being sold in the Borough and recommends that a public information campaign be launched to raise residents' awareness of how to identify illegally imported cosmetic and illegally imported foods and of reporting procedures.**
- b) **The Committee is of the view that closer working between the Council and UKBA is essential. The Committee therefore recommends that, as a matter of urgency a clear, accountable and robust Memorandum of Understanding (MOU) or protocol be set up between the Council (Trading Standards and Port Health) and UKBA, in order to exchange information freely and securely and that a joint database of offending exporters be developed. Provision for a back up system should also be put in place to ensue IT systems at Port Health Heathrow are available 24 hours a day to maintain the continuity of the critical process of information exchange.**
- c) **The Committee recommends that Officers make efforts to identify external funding in support of more joint operations.**
- d) **The Committee recommends that the 'Score on Doors' scheme continues to be published through the appropriate communication channels.**
- e) **During its deliberations, the Committee briefly considered the problems of the use of the drug Khat and its legal status. The Committee therefore recommends this as a future review topic in 2010/11.**

## **INFORMATION**

### **Reasons for recommendation**

The recommendations are aimed at enhancing measures already in place for combating the issue of illegal cosmetics and illegally imported foods at Border Controls and Wholesale/Retail.

### **Alternative options considered / risk management**

The Cabinet could decide to reject or amend the Committee's recommendations.

### **Supporting Information**

1. The Committee chose to review Trading Standards (Consumer Protection) as it had been a long time since there had been a review of this service area.
2. The aim of this review was to consider improvements to the Council's arrangements for combating the issue of illegally imported cosmetics and illegally imported foods.
3. This was a mini review which took place between October 2009 and February 2010.
4. The Committee's report (attached) gives full details of the review.

## **Officer Comments:**

Officers from Trading Standards, Food Health and Safety, Port Health Authority and the UK Border Agency (UKBA) were fully involved in this review and support the work of the Committee and the recommendations, which can be implemented within existing resources. Officers provided the Committee with the following comments regarding the progression of each recommendation:

- **Recommendation A** – Leaflets will be circulated to retailers and an article will be included in Hillingdon People, the Council’s Magazine warning residents about the dangers of illegal imported cosmetics and foods.
- **Recommendation B** – Work has begun in setting up the Memorandum of Understanding (MOU) between the agencies in order to exchange information freely and securely.
- **Recommendation C** – Sources for external funding will continue to be explored.
- **Recommendation D** – Publicity on the ‘Scores on Doors’ scheme will continue to be published and details of how to contact the Food Health and Safety Team will be included, in Hillingdon People, so as to encourage members of the public to report concerns relating to premises where food is prepared for public consumption.
- **Recommendation E** – The Khat plant is not controlled under the Misuse of Drugs Act 1971 and therefore, there is no import control to prevent entry either by Port Health or UKBA. We welcome the Committee’s intention to investigate this drug and its legality and use in the Borough further.

## **Financial Implications**

The Committee’s recommendations only have minor costs implications and these can be accommodated within existing budgets.

## **EFFECT ON RESIDENTS, SERVICE USERS & COMMUNITIES**

### **What will be the effect of the recommendation?**

The Committee’s recommendations would improve resident’s awareness as to the dangers of illegal cosmetics and illegally imported foods, improve the sharing of information securely between Council and other agencies (and at the same time enhance support for the Port Health IT system at Heathrow), and continue to raise awareness of the ‘ Scores on Door’ restaurant scheme.

### **Consultation Carried Out or Required**

The Committee took evidence from Council Officers and Officers from the UK Border Agency as described in the attached report.

## **CORPORATE IMPLICATIONS**

### **Corporate Finance**

A corporate finance officer has reviewed this report and its recommendations and is satisfied that the financial implications adequately reflect the direct resource implications for the trading standards service and that there are no wider resource implications for the Council as a whole.

### **Legal**

There are no specific legal implications for this report which seeks to improve the arrangements for combating the issue of illegal importation of cosmetics and foods at Border Controls through a series of administrative and communication based changes. No specific difficulties with the roll out of these arrangements have been brought to the attention of Legal Services.

In terms of recommendation B above, it is important that Officers comply with the relevant legal rules in relation to the Data Protection Act 1998 and the Freedom of Information Act 2000. The project should be monitored carefully in terms of the storing and release of such information. Officers should ensure that any issues are expeditiously brought to the attention of the Council's Data Protection Officer.

## **BACKGROUND PAPERS**

**Nil**



# HILLINGDON

LONDON

## RESIDENTS' AND ENVIRONMENTAL SERVICES POLICY OVERVIEW COMMITTEE

2009/2010

### ILLEGAL COSMETICS AND ILLEGALLY IMPORTED FOODS

Members of the Committee:

**Councillor Michael Markham (Chairman)**  
**Kay Willmott-Denbeigh** (*Councillor until 6 May 2010*)  
**Councillor Lynne Allen**  
**Councillor Paul Buttivant**  
**Councillor Janet Duncan**  
**Councillor Judy Kelly**



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## CHAIRMAN'S FOREWARD



Because public safety is always our prime concern, the committee decided to carry out a review of Trading Standards – the first for many years.

It was agreed to focus on illegal cosmetics and illegally imported foods and to review measures the Council had in place to combat these potentially dangerous issues.

We looked at what the Council is currently doing and the areas that might be improved to better protect Hillingdon residents.

Our recommendations are designed to improve residents' awareness as to the dangers of illegal cosmetics and illegally imported food, to improve the sharing of information securely between the Council and other bodies, improve support for the Port Health IT system at Heathrow, and to raise awareness of the 'Scores on Door' restaurant scheme.

We also agreed that the issue of Khat and its legal status should be considered as a future review topic in 2010/11.

I would like to thank officers from Trading Standards, Food Health and Safety, Port Health Authority and the UK Border Agency for their support and providing us with all the information required for this review.

**Cllr Michael Markham**

**The recommendations are not the result of a comprehensive review.**

# Summary of Recommendations

The Committee's review sought to examine and improve the Council's arrangements for combating the issue of illegal cosmetics and illegally imported foods at Border Controls. Following the evidence received, we make the following recommendations to Cabinet:

- 1. The Committee recognises the efforts made by the Council and UK Border Agency (UKBA) Officers to tackle illegal goods being sold in the Borough and recommends that a public information campaign be launched to raise residents' awareness as to how to identify illegally imported cosmetics and food and of reporting procedures.**
- 2. The Committee is of the view that closer working between the Council and UKBA is essential. The Committee therefore recommends that, as a matter of urgency a clear, accountable and robust Memorandum of Understanding (MOU) or protocol be set up between the Council (Trading Standards and Port Health) and UKBA, in order to exchange information freely and securely and that a joint database of offending exporters be developed. Provision for a back up system should also be put in place to ensure IT systems at Port Health Heathrow are available 24 hours a day to maintain the continuity of the critical process of information exchange.**
- 3. The Committee recommends that Officers make efforts to identify external funding in support of more joint operations.**
- 4. The Committee recommends that information about the 'Score on Doors' scheme continues to be publicised through appropriate communications channels, to continue to raise public awareness of inspected premises and awarded star ratings.**
- 5. During its deliberations, the Committee briefly considered the problems of the use of the drug Khat and its legal status. The Committee therefore recommends this as a future review topic in 2010/11.**

## INTRODUCTION

1. This report sets out the findings by the Residents' and Environmental Services Policy Overview Committee, following their Review into Illegal Cosmetics and Illegally Imported Foods at Border Controls and Wholesale/Retail. The aim of the review was to:

Consider improvements to the Council's arrangements for combating the issue of illegally imported cosmetics and foods.

2. Given the wide remit and extent of the service area, we agreed to focus the review on the following two areas, which fall under the Imported Food Office, based at Heathrow and the Food Health and Safety Team and Trading Standards, based at the Civic Centre:
  - i) Illegal Cosmetics, in particular – Cosmetic products containing hydroquinone and mercury can permanently damage the skin and cause cancer. They also contain kojic acid, although not a banned ingredient, kojic acid can be harmful if excessive amount is supplied and are imported and sold illegally. The review therefore sought to investigate procedures in place to prevent the sale of illegal cosmetics to Hillingdon residents.
  - ii) Illegally Imported Foods, Border Controls and Wholesale/Retail - Food imported into the UK, as well as food on sale must obey safety and hygiene rules and the review sought to establish measures in place by the Council to protect Hillingdon residents from fraudulent or deceptive practices.
3. The Committee agreed that the review would look at what the Council currently did and how this could be improved to better protect Hillingdon residents.
4. This report will firstly outline the methodology for the review and we hope would be of use to the Cabinet and officers when deciding on the way forward.

## **METHODOLOGY OF THE REVIEW**

### **Reason for the review**

5. The Committee considered that it had been a long time since the Trading Standards Service area had been reviewed.

### **Aim of the Review**

6. The review sought to consider improvements to the Council's arrangements for combating the issue of illegally imported cosmetics and foods.

## **TERMS OF REFERENCE OF THE REVIEW**

7. The Terms of Reference of the review was agreed as follows:
  - To review the Council's statutory duties in relation to illegal cosmetics and illegally imported food at Border Controls and at Whole Sale/Retail
  - To examine the role of the Food Health and Safety Team
  - To investigate the Food Standards Inspection process including checks for composition and labelling of all foods
  - To review the steps taken to matters relating to imported foods
  - To identify what checks are in place for discovering illegal cosmetics
  - To make recommendations to Cabinet as appropriate

## METHODOLOGY

8. Committee Members visited the Imported Food Office at Heathrow Airport on Friday 12 February 2010 and received an introduction on procedures.
9. A display and talk was given on imported products of non animal origins foods (PNOA), such as chilli powder and almonds. In addition, Members visited an Inspection Centre where a talk was given on the inspection procedures, together with a display of meat and fishery products, as well as hunting trophies.
10. The Committee examined reports from officers to explain the background around Illegal Cosmetics and Illegally Imported Foods and held one witness session on 17<sup>th</sup> February 2010 with the following witnesses:
  - Sue Pollitt, Divisional Trading Standards Manager, LBH
  - Shabeg Nagra, Port Health Manager, LBH
  - Oliver Darius, Team Leader, Food Health and Safety Team, LBH
  - Peggy Law, Consumer protection Manager, LBH
  - Viv Pullha , Officer from the UK Border Agency (Freight)
  - Joanna Kingdom, Officer from the UK Border Agency (Freight)
  - Peter Howard, Officer from the UK Border Agency (The Channels)

# EVIDENCE AND FINDINGS

## BACKGROUND

### WHERE ARE WE NOW?

#### 11. **Illegal Cosmetics**

It is an offence to supply a cosmetic product which may cause damage to human health when applied under normal conditions of use, or reasonably foreseeable conditions of use.

12. Grey imports such as toothpaste found in retailers are unlikely to contain banned ingredients but there are many substances that are either prohibited or restricted for use in cosmetic products. Skin lightening creams are the most common type of illegal cosmetics and those containing hydroquinone are banned in this country. There are also restrictions on animal testing of cosmetic products and ingredients. Certain labelling is also required such as:

- The name and address of the manufacturer/importer into the EU
- Durability
- Precautions
- Batch code
- Function
- Ingredients

13. Consumers can be assured that cosmetics which comply with the above regulations are safe to use. In the event that a problem arises, the product can be traced back to source and appropriate action taken.

#### 14. **Imported Food – Border Controls**

A recent study by the Food Standards Agency (FSA) estimated that approximately half of the food that is on sale in United Kingdom (UK) shops has been imported. Because of this, it is therefore important that effective controls are in place at points of entry across the UK such as London Heathrow Airport (LHR). Controls on imported food are carried out in all the transit sheds at Heathrow Airport and physical checks and identity checks on imported food of Product of Animal Origin (POAO) are carried out at two inspection centres which are approved by the European Union.

15. However despite effective import controls being in place, illegal imports still arrived at points of sale, as a result of smuggling activities, poor knowledge of import controls and incorrect declaration of food items by importers and their representatives.

The Committee therefore agreed the following recommendation to raise public awareness in identify illegally imported cosmetics and foods; and to increase

importers'/ representatives' knowledge of import controls and how to correctly declare food items:

**Recommendation 1 – That the Committee recognises the efforts made by Council and UK Border Agency Officers to tackle illegal goods being sold in the Borough and recommends that a public information campaign be launched to raise residents' awareness of how to identify illegally imported cosmetics and food and of reporting procedures.**

16. **Products of Animal Origin (POAO)** regularly inspected at LHR include fishery products, shellfish, dairy products etc. Customers that follow correct legal channels import a vast quantity of these goods. However, a significant number of consignments are introduced illegally. There are a number of reasons why a consignment may be considered to have been illegally introduced. These include:
- Introduced with no prior notification
  - Introduced without being presented at a Border Inspection Post (BIP)
  - Introduced from a country not permitted to export to the UK
17. Whilst it is an offence to introduce POAO from Non-EU countries into the UK except at a BIP, it should be noted that a number of exemptions apply. These include:
- Personal imports of certain products from certain countries
  - Trade samples accompanied by necessary documentation
18. The checks undertaken on POAO can be divided into 4 phases:
- Pre-notification** – The Importer/Agent must notify the Imported Food Office of the arrival of a consignment before it has been unloaded from the aircraft.
  - The Documentary Check** – Each consignment must be accompanied by a health certificate, airway bill and invoice. These documents must be presented to the Imported Food Office along with the necessary payment.
  - The Identity Check** – The majority of consignments must also undergo an identity check. An officer will inspect the consignment at a border inspection post to ensure that it corresponds with the accompanying documentation.
  - The Physical Check** – A certain percentage of consignments are subject to physical examination dependent on the origin.
  - v) That it has been transported at the correct temperature and if it is fit for use, for example human or animal consumption. This may also include sampling animal products for Histamine toxins, Heavy Metals, toxic chemicals including Malachite Green as well as antibiotics like Nitrofurans and also Sulphites found in foods; or such pollutants as Polycyclic Aromatic Hydrocarbons (PAHs).

19. Where the above checks are satisfactory, Part II of the Common Veterinary Entry Document (CVED) is completed and the consignment can continue to its onward destination. Rejected consignments are re-exported or destroyed depending on the reason for rejection.
20. **Products not of Animal Origin (PNAO)** There are currently few requirements in place that oblige an importer or their agent to notify a Border Inspection Post (BIP) of the intended arrival of most PNAO. PNAO that are considered high risk are however subject to enhanced checks and include products such as Chilli Powder, Palm Oil, Iranian Pistachios and almonds from the USA.
21. Despite this, it is important that priority is given to identifying imported foods inland because of there being no requirement to pre-notify most PNAO.
22. Checks carried out on PNAO are similar to those carried out on POAO and they are as follows:
- i) **Documentary check** - The documentary check involves inspecting invoices, health certificates and sampling results. The documentary check itself will often determine whether further checks are required.
23. Where a documentary check is deemed satisfactory, the importer is advised of this so that the goods can continue to their onward destination.
- ii) **Identity check** - During the identity check, the labels on the boxes and packages are inspected. This information is compared to the information contained in accompanying documentation for example analytical reports and invoices.
24. Where the information on the labels does not allow for full traceability, an officer may detain the consignment to undertake further sampling. In some cases, a consignment may be rejected and subsequently destroyed or re-exported.
- iii) **Physical check** - A physical check is a 'check of the product itself.' This often involves both formal and informal sampling. Products that are sampled are often done so in a targeted fashion, for example:
- Emergency control products,
  - Products with previously unsatisfactory results
25. Routine surveillance sampling is also undertaken to identify new and emerging risks. Products can be subject to sampling for toxins, lead, unpermitted colours, sulphites, microbiological contamination (ie salmonella, E.Coli), pesticides, irradiation (exposure to radiation), composition, authenticity, colour migration of packaging into the food etc.

## **Imported Food - Wholesale/Retail**

26. Part of the role of Food, Health and Safety Team is to carry out a series of programmed risk based food safety and food standards inspections within the London Borough of Hillingdon (outside the boundary of London Heathrow Airport). This is so as to ensure the safety of food at all stages of production. Part of these inspection activities include 'inland checks' for imported foods and are similar to those made by all other local authorities in England and Wales. There are in the region of 2,500 registered food businesses in Hillingdon and typically just under 1,000 inspections are undertaken each year. Current records show that there are 18 Importers situated in London Borough of Hillingdon (Businesses where the main activity is importing).
27. Inspections make up the majority of the all food intervention activities, the frequency of inspections are determined by individual risk rating scores determined at the time of the previous inspection.
28. Inland checks form part of the inspection process and extend to a range of food businesses including distributors, wholesalers, restaurants, manufacturers and retailers. Inspections include food hygiene and food standards checks and food sampling of all foods.
29. Food standards inspections include checks for composition and labelling of food and consideration of the advertising and marketing of the product and how it may mislead the consumer.
30. Outside the routine programme of inspections some intelligence led work takes place through the Council's Home authority leads for companies such as Coca Cola, HJ Heinz UK, and United Biscuits. In this regard complaints will often be received via other local authorities concerning the lawfulness of food labelling. Such matters often arise out of consumer complaints and subsequent sampling and analysis.
31. The Food Health and Safety Team also carries out a series of routine food samples in line with a food sampling programme. Officers will from time to time take samples by way of further checking a part of their inspection, for example that accurate labelling is being applied, or that there are no contaminants in a product.
32. The team will also react to complaints from consumers in Hillingdon; often these will be concerning hygiene practices.

## **Illegally imported food and illness**

### **Bush Meat**

33. Bush meat is the term commonly used for meat of terrestrial wild animals killed for hunting and commercial purposes. There is no evidence that sales of bush meat are taking place in Hillingdon. Such foods are certainly suspected of being imported, often in personal luggage from third countries, and are known to fetch a high value on the black market. Trade of Bush meat is understood to be popular in West and Central Africa and so it is reasonable to expect that some quantity of these foods may turn up from time to time in communities, including people from this area of the

world. Further intelligence and advice may be provided by our Imported Food Office.

### **Halal Meat**

34. Halal is an Arabic word that means “permissible”. In terms of food, it means food that is permissible according to Islamic law. Certainly many small businesses are selling meat which they claim to be Halal, and broadly speaking officers will accept the description based upon limited traceability checks - mostly checking invoices.

There is no current evidence to suggest the sale of widespread fraudulent sale of Halal Meat in Hillingdon. In any case determining whether a consumer has been or is being misled by anyone placing for sale a Halal food on the market is a matter of fact to be proven in a court of law. To the best of officers’ knowledge there is no current case law.

### **Enforcement Responsibilities at Heathrow - London Borough of Hillingdon – Imported Food Office (IFO)**

35. Officers of the IFO are responsible for carrying out food hygiene and food standards checks on imported foods arriving at LHR. This includes checks set out in European legislation under the veterinary checks regime.
36. Officers of the IFO are not responsible for detecting smuggled POAO, with the exception of that found in the BIP. If illegally introduced products are uncovered while undertaking checks in a premises other than a BIP, a detention notice will be issued and the UK Border Agency (UKBA) contacted.

### **UK Border Agency (UKBA)**

37. The UKBA is responsible for locating illegally introduced POAO and for deterring this practice. UKBA do not however have responsibility for seizing POAO in BIP’s or inland. Because of this, the IFO retains an important role in the control of illegally introduced POAO at borders.
38. UKBA have adopted a risk-based approach to enforcement and target their resources where it believes that the greatest contribution can be made to reduce the introduction of disease. The action taken by UKBA is not restricted to simply seizing goods. Additional enforcement action can be taken where there has been a deliberate attempt to evade checks, or where a repeat offender has been identified.

## LEGAL POWERS

39. The Cosmetic Products (Safety) Regulations 2008 came in to force on 18th June 2008. The Regulations consolidate earlier Regulations and implement current European Directives on restrictive substances, restrictions on animal testing and the requirement for certain labelling.
40. Imported food legislation is driven by the implementation of European Community (EU) law. Much of the legislation that is focused on controls of POAO is implemented by the Products of Animal Origin (Third Country Imports) (England) Regulations 2006 (as amended). Third Country imports are from countries which are not members of the EU.

Regulation 5 (3) of these Regulations states the following:

*'In cases where an officer of a local authority, when exercising any statutory function, discovers at a point of entry a consignment or product that he considers may have been brought in breach of regulation 16, he must notify an officer of Revenue and Customs and detain the consignment or product until an officer of Revenue and Customs takes charge of it.'*

Regulation 16 states:

*'No product may be brought into England from a third country except at a border inspection post designated and approved for veterinary checks on that product.'*

41. Additional enforcement options that can be used by officers of the IFO to combat illegally introduced POAO include:
- Regulation 8 – Notices may be served requiring consignments of POAO be stored under the supervision of the IFO employees until such time that it is decided that correct import procedures have been followed. Such a Notice may be served when it is unclear if a product is indeed a POAO.
  - Regulation 24 – Notices are served on the importer or his representative when illegally introduced POAO are discovered / identified in the BIP.
42. Much of the legislation that is focused on controls of PNAO is implemented by the Official Feed and Food Controls (England) Regulations 2007 (as amended). Regulation 882/ 2004, as well as Council regulation, provides the main controls for PNAO imported in the UK from non-EU countries. Regulation 882/2004 establishes a harmonised framework of general rules for the organisation of controls at community level, which includes official controls on the introduction of food and feed from third countries (countries outside the EU).

It also provides for a list to be drawn up of feed and food of non-animal origin that is on the basis of known or emerging risks to be subject to increased level of official controls at the point of entry into the EU.

43. The legislation provides powers to inspect PNAO products and allows for them to be

detained pending the results of any examination that is undertaken as part of the controls. Products that are subsequently found to have been introduced in contravention of the above legislation are detained with the following options given to the importer or his representative:

- Destruction
- Re-export
- Re-processing or alternative use for food

44. In addition to the above controls, the European Commission (EC) may at any time introduce emergency controls when it is decided that a certain product is implicated in a certain risk.

## **ENFORCEMENT AND LEGAL ACTION**

45. When food is imported from other European Countries they have free movement, this is known as intra community trade. So as to ensure free movement of safe and wholesome food a series of EC Regulations are applied to each member state. Any food from third countries should comply with similar requirements unless a specific agreement exists between the Community and the exporting country.

46. The general principles and requirements of food law for member states are set out in EC regulation, which deal with protecting consumer interests with its aim of preventing fraudulent or deceptive practices. This includes the preventions of the adulteration of food and other practices, which may mislead the consumer and preventing unsafe food being placed on the market. Another key aim is to ensure good traceability of food and general hygiene requirements for all food business operators with specific hygiene requirements for foods of animal origin.

47. All food businesses in Hillingdon are required to be registered, so as to enable inspections and inland checks to take place.

48. Enforcement powers are provided by the Food Safety Act 1990, General Food Regulations 2004, Food Hygiene (England) Regulation 2006 and the Food Labelling Regulations 1996.

49. During the course of food inspections where imported foods are suspected the traceability of the product will be investigated and mostly dealt with according to a hierarchy of enforcement, normally beginning with a warning. Liaison with other enforcing authorities will take place as necessary and the involvement and advice of the Food Standards Agency will be sought.

50. If food is considered unsafe detention and seizure powers enable consignments to be removed from sale. Moreover where unsafe food is suspected, food businesses will be made aware that it is an offence to place on the market any food which it has processed, produced, manufactured distributed or imported where it does not comply with food safety requirements. Moreover they are required to cooperate with the council to ensure an effective product withdrawal failure to do so is also an offence.

51. The assessment of the legitimacy of describing or presenting food is a matter of judgement. Guidance exists from the Food Standards Agency on terms such as

Fresh, Pure, Natural, Home Made etc. European Community (EC) Regulations deal with things such as nutrition and health claims. Notwithstanding this, the market is fast moving and evolving with companies seeking to add value to their products all the while. The meaning of terms and descriptions are often open to interpretation.

This also extends to the interpretation of Halal meat and although there are a number of certification bodies in existence, there is no accredited list. A number of non-government organisations exist that monitor and approve Halal Slaughter, which include The Halal Food Authority and the UK Halal Corporation. Other interest groups such as the Muslim Council of Great Britain may be able to give advice on Halal food.

## **PROSECUTIONS**

52. The Food Health and Safety Team have not completed any prosecutions that are directly related to Imported Foods. Many of the matters dealt with by the team including complaints from members of the public relate to poor hygiene practices often resulting from third country immigrants setting up small food businesses. It has been long argued that part of the failing in the legislation is that there is no requirement to hold a permit or licence before opening a food business, which in effect means anyone without any prior knowledge or experience can open a food business. There is currently no evidence to suggest a particular problem with illegal imported foods.

## **PARTNERSHIP WORKING**

53. Imported foods by their nature do not respect boundaries so addressing any matters relating to imported food clearly requires an approach encompassing national and regional initiatives which will draw on intelligence gathered from across the UK. For this reason food sampling work will sometimes target imported foods as part of regional and national surveys. Surveys are agreed by the Food Standards Agency in conjunction with the Local Authority Co-ordinator of Regulatory Services (LACORS), further studies are discussed and agreed between Environmental Health Officers, the Health Protection Agency and Public Analyst.
54. Liaison Groups across London provide a suitable forum for officers from the team to discuss such matters as well as particular enforcement issues and or intelligence, which may include imported food checks.
55. Officers will routinely attend the North West London Sector Group Meetings. Otherwise any more urgent matters may be notified through the Food Standards Agency Incidents Alert System. This notifies all local authorities on food related matters for information or for action, dependant upon the level of risk involved. In response, the team may divert its resources into site-specific inspection, correspondence or other communication in ensure product withdrawals from the market place.

56. The London Borough of Hillingdon is a member of the Association of Port Health Authorities (APHA). Members actively work with the Association in sharing their expertise and best practice to deliver consistent and effective port health services.
57. The Association plays an important role in protecting public health through liaison with Government departments and agencies, local authorities and internationally through the EU, the World Health Organisation and trade bodies. It contributes significantly to national and international policy development and keeps its members up to date with changes in legislation and guidance.

## **KHAT AND THE LAW**

58. During its deliberation, the Committee briefly considered the problems of the use of the drug Khat and its legal status.

### **What is khat?**

59. Khat is a green-leaved shrub that has been chewed for centuries by people who live in the Horn of Africa and the Arabian peninsula. It turned up in Europe, including the UK, a few years ago and is used particularly among emigrants and refugees from countries such as Somalia, Ethiopia and the Yemen.

It remains potent for only a few days after picked. It is strongest when the fresh leaves are chewed but can also be made into a tea or chewable paste.

60. The khat plant itself is not controlled under the Misuse of Drugs Act, although the active ingredients, cathinone and cathine, are Class C drugs. Cathinone may not be lawfully possessed or supplied except under a licence for research, though cathine may be prescribed. It is controlled by law in countries such as America, Canada, Norway and Sweden.

### **Legality of Khat**

61. Khat can be legally bought in Britain with no restriction of the age of the purchaser. About seven tones of it are estimated to pass through Heathrow Airport alone each week.
62. Currently there is no legal requirement for importers to notify the Imported Food Office of Khat imports arriving at Heathrow Airport. Irrespective of this, on the 26 September 2009, the Imported Food Team conducted surveillance checks within several transit sheds surrounding Heathrow. During the surveillance checks, six consignments of Khat were physically inspected and subject to analysis.
63. The laboratory reports likened Khat to tobacco rather than food, because the product is chewed to extract the juices and the residue spat out.
64. The matter was raised with the Food Standards Agency who adopted the same line as the laboratory report. As a result, there is currently no enforcement action that can

be taken until status of the product is clarified.

This was considered to be an issue that would require further investigation and the Committee makes the following recommendation to take this into account:

***Recommendation 5 - During its deliberations, the Committee briefly considered the problems of the use of the drug Khat and its legal status. The Committee therefore recommends this as a future review topic in 2010/11.***

## WHAT KEY ISSUES ARE WE FACED WITH?

### Illegal Cosmetics

65. Cosmetics which do not comply with the Regulations may:
- Contain banned ingredients such as hydroquinone or mercury  
May contain permitted ingredients but in concentrations above that are allowed
  - May not have an ingredients list – thus causing problems for persons with allergies
  - May not declare a shelf life – some cosmetics deteriorate with age
  - Are difficult to trace and remove from the market if identified as unsafe and need to be destroyed.

### Imported Food – Border Controls

66. The issues faced in respect of Imported Food/Border Controls include:
- Products being illegally imported outside normal office hours such as the evening and weekends.
  - The potential for inconsistency of enforcement between agencies
  - The lack of knowledge by UKBA staff of current imported food legislation, due to other priorities and legislative responsibilities
  - Agents and importers lack of knowledge on imported food control requirements
  - Limited resources for the imported food office

### Imported Food - Wholesale/Retail

67. There is no data currently available to the Food Health and Safety Team, which would allow the council to draw any conclusions concerning the scale of the illegal imported foods in Hillingdon and the implications for public safety.
68. It is widely understood that over half of foods in the UK are imported, and it would be reasonable to assume that the same is true of foods within Hillingdon.
69. There is a sizeable immigrant population carrying on small food businesses in the Hayes area and general compliance with Food legislation is poor, although no wider imported food issues have been identified.

70. The Scores on Doors Scheme was piloted by a group of London Local Authorities including Hillingdon as part of a FSA pilot and was launched in 2007. It encourages and recognises the many food businesses that achieve full legal compliance and allows the public to find out about food hygiene standards within businesses and make informed decisions about where they eat in London.

Ratings are awarded once structural conditions of the premises are checked, as well as the practices, procedures, and confidence in the management to handle food safely.

71. Star ratings (and scores) apply to the time of the last inspection only and may not represent current conditions.

72. We suggest that the 'Scores on Doors' Scheme be publicised to raise residents awareness of the scheme and encourage them to report any concerns they may have about food premises visited.

***Recommendation 4 - The Committee recommends that information about the 'Score on Doors' scheme continues to be publicised through appropriate communications channels, to continue to raise public awareness of inspected premises and awarded star ratings.***

# THE WAY FORWARD

## CURRENT MEASURES IN PLACE AND WHERE WE WANT TO BE:

### Raising Awareness

73. While illegally imported cosmetics are not commonly found in retail outlets in Hillingdon, non-compliant grey imports may be discovered in shops and in markets. Retailers are given advice regarding the law, and are told to ensure that they buy from reputable wholesalers and importers and to check dates and labelling.

Consumers assume that every cosmetic product is safe to buy and use; consumer education therefore is key as refusal to buy this type of illegal product would further reduce their availability.

74. The Imported Food Office has taken the following steps to raise awareness:
- Guidance packs and guidance notes on imported food controls are available to importers and agents.
  - Agents and importers are regularly emailed imported food updates via email and advisory letters.
  - During 2008, an advisory campaign was conducted by the imported food office and an imported food control information pack issued to agents regarding official controls on imported food matters.

### Co-ordinated Working Approach

75. Port Health and the UKBA recognise that they can only successfully tackle illegal imports with a combined effort across both agencies; as a result they have a co-ordinated approach to illegal imports and undertook a joint working project (Operation Codex 3) during 2009 to improve consistency and detection of illegally imported food controls.
76. Meetings have also been arranged with HMRC Tariff Team to discuss increased joint operations between Port Health and UKBA within the Transit Sheds surrounding Heathrow Airport. These operations would take place during the late evenings and weekends the times when importers and agents would least expect inspections to take place.

We recognise that the level of joint operations would be dependent on the limited resources available and suggest the following recommendation to secure funding from external sources:

***RECOMMENDATION 3 – The Committee recommends that Officers make efforts to identify external funding in support of more joint operations: Due to limited funding, the number of joint operations can not be increased.***

77. **Training** – Port Health is currently devising a training programme for D4 Outdoor Co-ordinated Team and compliance Team. Training days have also been planned for agents and importers to better increase awareness of import controls and declaration of food items.
78. **IT System** – The HMRC CHIEF system is the main computer system used by Customs for clearance of imported goods. Commodity codes tagged on this System alerts customs to products that require official checks by Port Health.

### **Information Sharing**

79. Regular meetings between Port Health, UKBA and Trading Standards have been proposed to ensure updates, consistency and sharing of information to enable improved service delivery.

During the witness session, we were encouraged to hear that regular meetings had been arranged to share information and updates between the different agencies. The Committee therefore made the following recommendation to further enhance closer working and to support the critical exchange of information:

**The Committee is of the view that closer working between our partner agencies (e.g. Trading Standards, UKBA and Port Health) is essential. The Committee therefore recommends that, as a matter of urgency a clear, accountable and robust Memorandum of Understanding (MOU) or protocol be set up between the agencies in order to exchange information freely and securely and that a joint database of offending exporters be developed. Provision for a back up system should also be put in place to ensure IT systems at Port Health Heathrow are available 24 hours a day to maintain the continuity of the critical process of information exchange.**

## CONCLUSIONS

80. The Residents' and Environmental Services Policy Overview Committee appreciated the tremendous work being done by Trading Standards in combating illegal cosmetics and illegally imported foods at Heathrow Border Controls wholesale retail.
81. That although there were effective measures in place in dealing with imported illegal consignments, there needed to be more joined-up working and operations between the UK Border Agency (Heathrow) and Port Health to increase detections.
82. That information sharing between agencies could be better improved by setting up a secure Memorandum Of Understanding, the legal gateway for exchanging information between all the agencies.
83. That UKBA had a dedicated team which worked on a 24 hour basis, and although the Imported Food Team operated between the hours of 8am to midnight 7 days a week, it also had a call-out cover after 12 midnight. Any consignments requiring seizure of goods would be notified to UKBA, who had the legal powers of seizure.
84. That Skin lightening Cream, the most common type of illegal cosmetics was not prevalent in Hillingdon due to the ethnic make up, but was included in the regular routine inspections carried out in wholes/retails shops.
85. That the problems of the use of Khat and its legal status briefly discussed during the review be considered as a future review topic in 2010/11.

# APPENDIX 1

## Glossary

<b>UKBA</b>	United Kingdom Border Agency
<b>BIP</b>	Border Inspection Post
<b>MOU</b>	Memorandum of Understanding
<b>HMRC</b>	Her Majesty's Revenue and Customs
<b>POAO</b>	Products of Animal Origin
<b>PNAO</b>	Products not of Animal Origin
<b>OCT</b>	Outdoor co-ordination Team
<b>FSA</b>	Food Standards Agency
<b>EU</b>	European Union
<b>EC</b>	European Commission
<b>LHR</b>	London Heathrow Airport
<b>PAHs</b>	Polycyclic Aromatic Hydrocarbons
<b>IFO</b>	Imported Food Office
<b>CVED</b>	Common Veterinary Entry Document

## APPENDIX 2

### London Food Hygiene Scores on the Doors Ratings

The London scheme retains a consistent rating of food businesses across London using a consistency framework rolled out to all the participating authorities. This was based upon the Food Law Code of Practice

Inspected premises are awarded one of the following star ratings:



**Excellent:** Very high standards of food safety management. Fully compliant with food safety legislation.



**Very good:** Good food safety management. High standard of compliance with food safety legislation.



**Good:** Good level of legal compliance. Some more effort might be required.



**Broadly compliant:** Broadly compliant with food safety legislation. More effort required to meet all legal requirements.



**Poor:** Poor level of compliance with food safety legislation – much more effort required.

**Very poor:** A general failure to comply with legal requirements. Little or no appreciation of food safety. Major effort required

Since the start of the scheme some limited publicity has been achieved through the Local newspaper as well as advertising on JC Decaux Bill boards. Funding for publicity is however limited.

The scheme has been accepted by small businesses, and has often acted as an incentive for them to improve. Star ratings are can be accessed via the following websites:

[www.yourlondon.gov.uk](http://www.yourlondon.gov.uk)

[www.scoresonthedoors.org.uk](http://www.scoresonthedoors.org.uk)

## HILLINGDON LOCAL DEVELOPMENT FRAMEWORK: CONSULTATION DRAFT CORE STRATEGY

<b>Cabinet Member</b>	Councillor Keith Burrows
<b>Cabinet Portfolio</b>	Planning and Transportation
<b>Officer Contact</b>	Jales Tippell, Planning & Community Services
<b>Papers with report</b>	Appendix 1 - Local Development Framework Consultation Draft Core Strategy (hard colour copies circulated separately)

### HEADLINE INFORMATION

<b>Purpose of report</b>	This report presents the Local Development Framework Consultation Draft Core Strategy for approval for the purposes of public consultation.
<b>Contribution to our plans and strategies</b>	The Consultation Draft Core Strategy aligns closely with the Sustainable Community Strategy and contributes to delivering key plans and strategies, in particular the Transport Strategy, Economic Development Strategy and Housing Strategy.
<b>Financial Cost</b>	The cost of preparing and consulting on the Consultation Draft Core Strategy can be met from existing revenue budgets for 2010/11.
<b>Relevant Policy Overview Committee</b>	Residents' and Environmental Services Policy Overview Committee.
<b>Ward(s) affected</b>	All

### RECOMMENDATIONS

That Cabinet:-

1. **Notes the contents of the Local Development Framework Consultation Draft Core Strategy.**
2. **Approves the Local Development Framework Consultation Draft Core Strategy for public consultation.**
3. **Grants delegated authority to the Director of Planning and Community Services to agree, in conjunction with the Cabinet Member for Planning and Transportation, to make any minor editing and textual changes to the Consultation Draft Core Strategy, before it is formally published.**

4. **Grants delegated authority to the Director of Planning and Community Services to agree, in conjunction with the Cabinet Member for Planning and Transportation, the Sustainability Appraisal for the Consultation Draft Core Strategy, before it is formally published.**
5. **Approves the Local Development Framework Consultation Draft Core Strategy as a material consideration for the purposes of development management.**
6. **Instructs officers to carry out a minimum 6 week public consultation on the Core Strategy and the Sustainability Appraisal in compliance with the approved Statement of Community Involvement, and for officers to report back to a future meeting of Cabinet the outcome of public consultation and recommendations for changes to the Core Strategy prior to its formal submission.**
7. **Agrees that previous draft Development Plan Documents of the Local Development Framework, summarised in paragraph 3 of the report, are rescinded to the status of background documents for the purposes of the preparation of the Local Development Framework.**
8. **Agrees the arrangements to revise the Local Development Scheme as set out in paragraph 11 of the report.**

## **INFORMATION**

### **Reasons for recommendation**

These recommendations are sought to enable the council to make meaningful progress on the Local Development Framework Core Strategy in order to meet targets approved by the Government Office for London in the council's Local Development Scheme.

The Core Strategy will in due course replace the Unitary Development Plan, (adopted 1998), Saved Policies 2007. Strategic policies in the Core Strategy are intended to provide a more up-to-date framework to determine planning applications forming a material consideration alongside the Unitary Development Plan and the London Plan, Consolidated with Alterations 2008, and the replacement London Plan 2009.

### **Alternative options considered / risk management**

The Cabinet may decline to approve the Consultation Draft Core Strategy. Alternatively Cabinet may request officers to make significant changes to the Core Strategy for its subsequent approval prior to public consultation.

It is considered that these alternative options would prejudice progress on the preparation of the Local Development Framework as a whole, result in targets in the Local Development Scheme being missed, and fail to provide the council with an up-to-date statutory development plan in order to deal with major development proposals in the future.

### **Comments of Policy Overview Committee(s)**

The Residents' and Environmental Services Policy Overview Committee have not requested to consider this report at this stage.

## Supporting Information

### The Local Development Framework Consultation Draft Core Strategy - Background

1. The Core Strategy is a spatial plan, providing the strategic vision and direction for new development through to 2026. It aligns closely with the Sustainable Community Strategy and conforms to the Regional Spatial Strategy – i.e. the Mayor of London's London Plan.
2. This draft version of the Core Strategy has been framed in accordance with relevant Planning legislation, national planning policy statements (PPS); on-going advice from the Government Office for London (GOL) and the Planning Inspectorate (PINS), and also from lessons learnt from professional planning bodies and agencies, in particular the Planning Advisory Service (PAS). In summary the Core Strategy has evolved from the following documents:
  - Issues and Options (Spring 2005)
  - Preferred Options (Autumn 2005)
  - Revised Preferred Options (Spring 2007)
3. From 2008 the council revised its approach to the preparation of the Local Development Framework, to comply with the new Planning Act 2008 and revised Planning Policy Statement 12 (June 2008) on plan making and to deal with the emerging issues relating to the growth of Heathrow airport, which have only recently been resolved. The Core Strategy now omits development management policies and site specific allocations, (which will follow later), and instead focuses on a long-term vision for Hillingdon grounded by infrastructure provision and delivery of strategic policies. Hence the current Core Strategy, whilst drawing up earlier work, differs radically from earlier versions. It also benefits greatly from close engagement with Hillingdon Partners from autumn 2009.
4. In order to clarify the status of these earlier documents it is recommended that they be relegated as background documents in order to avoid any confusion that they form part of the development plan.

### Consultation Draft Core Strategy – Summary of Contents and Key Provisions

5. Appendix 1 of this report contains the draft Core Strategy. The format and contents of the Core Strategy are largely prescribed by the 2004 and 2008 Planning Acts and PPS12, although there is local discretion on how this is arranged and presented. In summary the draft Core Strategy comprises 9 chapters as follows:-
  - An Introduction
  - A Summary of the seven point Vision for Hillingdon
  - A Portrait of Hillingdon – Hillingdon's Characteristics; Key Facts; Main Challenges; and Major Infrastructure Projects.
  - The Vision expanded, including Strategic Objectives to deliver the Vision; the Spatial Strategy; and Key Diagram
  - Chapters 5 to 9 comprise 5 separate chapters organised into distinct spatial topics with Core Policies dealing with The Economy; New Homes; Historic and Built Environment; Environmental Management; and Transport and Infrastructure.
6. The headline provisions of the Core Strategy can be described and quantified as follows:-
  - Housing and employment growth, comprising 5,475 new dwellings and 9,000 new jobs up to 2026,

- Protection of designated employment land together with the managed release of 17.58 hectares of employment land for other uses,
- Economic regeneration and employment growth concentrated in the Hayes / West Drayton corridor, anchored by Crossrail,
- Maximising the economic benefits of Heathrow (with no 3<sup>rd</sup> Runway) and mitigating the negative environmental impacts,
- The expansion of Uxbridge town centre to accommodate 18, 855 square metres of retail floorspace,
- Enhanced District Centres with a diversified, community focused role
- Protection and enhanced accessibility to open spaces, Green Belt and Metropolitan Open Land,
- Preservation of the borough's built heritage and improvement to the built environment
- Improved north – south public transport routes and enhanced transport interchanges, together with the promotion of walking and cycling,
- Local response to Climate Change achieved through Environmental Management, including biodiversity, air quality, flooding and protection of mineral deposits

### Sustainability Appraisal

7. Development Plan Regulations require all LDF Development Plan Documents, (DPDs) to undergo a Sustainability Appraisal. A Sustainability Appraisal was originally carried out on the Core Strategy in 2007, using methodology from 2004, but with the new approach to the preparation of the Core Strategy referred to in paragraph 3 above, and with new baseline information, a revised Sustainability Appraisal is required. This will assess the new strategic objectives and all new policies in the Strategy against revised sustainability objectives, but using the original sustainability framework. The Appraisal is currently being carried out and in accordance with Recommendation 4 of the report it is proposed that delegated authority be granted to the Director of Planning and Community Services in conjunction with the Cabinet Member for Planning and Transportation to approve the Appraisal for public consultation alongside the Core Strategy.

### Consultation Arrangements

8. Consultation on the draft Core Strategy is planned for a period of a minimum of 6 weeks commencing in mid June. The manner of the consultation is prescribed by Regulation 25 of The Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008. Consultation is also required to comply with the council's Statement of Community Involvement, 2006.

### Local Development Scheme

9. The programme for the preparation of the LDF is contained in the Local Development Scheme, (LDS), approved by the Council in December 2008, and endorsed by GOL and the Mayor of London in April 2009. The programme has changed considerably over the last year, not only with in relation to the preparation of the Core Strategy, but with regard to other key DPDs such as the Development Management DPD and Site Allocations DPD. (Changes to the programme have largely been outside the council's control, for example awaiting the resolution of Runway 3 issues for the preparation of the Core Strategy). Whereas public consultation under Regulation 25 of the above Regulations for these Documents was originally programmed

for June / July 2010, it is now envisaged that this stage will be delayed to later this year or early next year.

10. Advice from GOL is that only where the LDS is totally out of date should a council consider revising it: the priority is to ensure that the community are kept informed with real-time information about the programme on the council's web site. Also, as the LDS needs to be up-to-date at the submission stage of DPDs when the independent Inspector scrutinises the preparation of Documents it is advisable to revise the Scheme only when there is certainty that the programme can be met.

11. It is therefore considered that the LDS should be revised once the Core Strategy has been consulted on, when the priorities of the new administration have been established, and when a clearer view of the resources and capacity of the LDF Team to complete remaining DPDs has been assessed. In this respect the process should be helped by the arrival of a permanent LDF Team Manager in the near future. It is therefore suggested that Cabinet agrees that a report on the revised LDS be considered alongside the outcome of public consultation on the Core Strategy as set out in recommendation 6 of this report.

### **Financial Implications**

The costs of producing the draft Core Strategy and carrying out public consultation is estimated to be £10,000 and will be met from the planning budget.

### **EFFECT ON RESIDENTS, SERVICE USERS & COMMUNITIES**

#### **What will be the effect of the recommendation?**

The draft Core Strategy will provide the overarching long-term development framework for the development of the borough up to 2026. It will be the key delivery mechanism of the Sustainable Community Strategy and will provide the context for the preparation of further Development Plan Documents (DPDs) over the next few years, including the Development Management; Site Allocations and Heathrow Opportunity Area DPDs. The Core Strategy will therefore have a significant impact, both short term and long term, upon residents, businesses, service users and all members of Hillingdon's communities.

#### **Consultation Carried Out or Required**

The preparation of the Core Strategy has involved the close and active involvement of Hillingdon Partners through the mechanism of an LDF Working Group. This Group held 5 meetings from September 2009 to January 2010 and was instrumental in defining the Vision, Challenges, Strategic Objectives, Key Diagram and emerging Core Policies of the Core Strategy.

Consultation with GOL has been carried out through regular liaison meetings over last year. Government Office for London has provided comments on the emerging Core Strategy and more recently at the pre-Cabinet report stage. They have been supportive of Hillingdon's approach and content of the Core Strategy and have not raised any fundamental issues.

Internal ongoing involvement of key officers has taken place during the preparation of the Core Strategy, including the council's Operational Management Group.

External consultation will be carried out as outlined in paragraph 8 above.

## **CORPORATE IMPLICATIONS**

### **Corporate Finance**

The cost of preparing and consulting on the Local Development Framework Consultation Draft Core Strategy, is estimated to be £10,000. Corporate Finance has reviewed this report and its recommendations and is satisfied that these costs will be contained within the planning budget.

### **Legal**

Section 15 of the Planning & Compulsory Purchase Act 2004 places a statutory duty on the Council to prepare and maintain a Local Development Scheme ("the Scheme"). The Scheme will specify those documents that are Development Plan Documents. Regulation 7 of the Town and Country Planning (Local Development) (England) Regulations 2004 states that the Core Strategy will be a Development Plan Document.

When preparing the Core Strategy, the Local Planning Authority must comply with the consultation requirements found both in the Town and Country Planning (Local Development) (England) Regulations 2008 ("the 2008 Regulations") and the newly revised PPS 12 (Local Spatial Planning) which sets out government policy on Local Development Frameworks.

This includes the duty to consult with the specific and general consultation bodies, the requirement to place an advertisement in the newspaper and the general duty to comply with the Council's Statement of Community Involvement.

The Regulations require that any representations received must be fully considered by the decision maker, including those which do not accord with the proposals.

### **Corporate Property**

The consultation draft Core Strategy does not contain any specific Policy or site Proposals relating to council land or property. Strategic Policies apply generally to all land and property in the borough regardless of ownership. The Strategy, including the Infrastructure Plan, has been prepared within the context of the council's asset management plan. In general terms the Plan aims to safeguard property assets in public service or community use. It also helps to identify opportunities where services need to expand, for example to respond to demographic changes. However in circumstances where community services need to be rationalised, the effect of planning policy may tend towards the retention of community facilities, which may at times restrict sales of surplus Council assets for residential development.

## **BACKGROUND PAPERS**

Cabinet Report 18<sup>th</sup> December 2008 - Hillingdon's Local Development Framework Revised Local Development Scheme.

Statement of Community Involvement November 2006

## REQUIREMENTS FOR ADDITIONAL PRIMARY SCHOOL PLACES

<b>Cabinet Member</b>	Councillor David Simmonds
<b>Cabinet Portfolio</b>	Education & Children's Services
<b>Officer Contact</b>	Sarah Harty, Education and Children's Services
<b>Papers with report</b>	Appendix 1: Hillingdon Births

### HEADLINE INFORMATION

<b>Purpose of report</b>	To report on the need for a significant number of additional primary school places, outline an indicative proposed programme of school expansions to meet this need, and seek Cabinet agreement to begin statutory consultations.
<b>Contribution to our plans and strategies</b>	Development and improvement of education in our schools (Council Plan 2007/10)
<b>Financial Cost</b>	Indicative costs included in the report
<b>Relevant Policy Overview Committee</b>	Education & Children's Services
<b>Ward(s) affected</b>	All

### RECOMMENDATIONS

That Cabinet:

1. Instructs officers to begin the statutory consultation process on proposals for permanent additional places at schools identified as Phase 1 of the primary expansions programme.
2. Instructs officers to identify suitable sites for a new three form of entry primary school in the Hayes area.
3. Notes the actions that officers are taking to secure sufficient primary school places from 2012 onwards.

## **INFORMATION**

### **Reasons for recommendation**

The council has a statutory duty to provide sufficient school places for Children and Young People. The record number of applications for September 2010 Reception places has confirmed the forecast that additional school places will be needed. Robust data gathered from the ONS (Office for National Statistics), GLA (Greater London Authority) and local PCT indicates that this shortage of school places will become more acute in the next few years, with approximately 19 forms of entry being required by September 2012/13.

Phase 1 school expansions will address pressure for places in September 2010. Whilst temporary arrangements are now in place for school year 2010/11, statutory consultations with all key stakeholders will be necessary before providing permanent additional school buildings at these schools to accommodate children beyond 2011.

Phase 2 school expansions and new provision will address pressure for places from 2012. This phase will require feasibility studies and options appraisals for several schools. It is anticipated that 19 forms of entry will be needed in the borough by September 2012.

The alternative option is to undertake no school expansion programme at this time. However, it is already apparent from the high demand for Reception places this current school year, and offers for places in September 2010, that pressure is real and growing. The numbers of births across Hillingdon confirmed by the PCT and ONS are the strongest and most reliable indicator that there will be a sustained increase in demand for school places. It should also be noted that if the impact of recession factors does not recede in the coming year, further places may be needed for September 2011 beyond those already anticipated.

### **Comments of Policy Overview Committee(s)**

None at this stage.

### **Supporting Information**

1. Each year an estimate is made of the number of school places required for several years ahead by using official population projections. Population projections are provided annually by the GLA and this data is routinely cross checked with other data sources such as recent ONS births data, local housing activity and the latest actual demand for school places. In recent years the GLA projections have been satisfactorily accurate to around 99% for the following year, and within 1-2% for subsequent years. In 2008, a need for six additional forms of entry between 2010 and 2012 was identified.
2. However, last year two separate but converging issues arose that have increased significantly the demand for school places, both for September 2010 and in future years:
  - It became apparent that there was some unusual pressure for 2009/10 Reception places which was also affecting other London boroughs. This pressure has since been attributed by the GLA's professional demographers to economic and migration factors, with fewer families leaving London and more families being drawn to London. In simple terms, the number of Reception children each year is typically 90% of the corresponding number of births recorded 5 years earlier. This 'retention rate' of births has now jumped by several percentage points.

- In Hillingdon births have reached an exceptionally high level, with 4,126 births recorded in 2008, exceeding the previous record by several hundred children. The PCT has since confirmed that births in 2009 remained at a similarly high level. These large cohorts will require primary school places from September 2012.

Consultation has taken place with demographic experts at the GLA and their professional opinion is that the unusual migration pressure across London should recede when the economy and housing market recovers. This scenario would mean that current school place pressures would abate just as the very high birth levels impact from September 2012. However, it should be noted that there is the risk that the migration pressure might not abate, and could exacerbate the problems beyond 2012. This potential risk will be considered when exploring options for Phase 2 of the programme.

### **Phase 1 Programme for 2010/11 and 2011/12**

3. Rising birth rates in calendar years 2006 and 2007, and newly completed housing developments, have already meant that additional Reception school places are required for September 2010. Even more places are now required to cope with the temporary unusual migration pressure referred to above.
4. Forecasts prepared in autumn 2009 indicated a net deficit of 147 Reception places across the borough for school year 2010/11. To meet this expected demand, arrangements are being made for up to an additional 210 temporary Reception places, following discussions with several schools. At this point, this provision appears to be sufficient overall to meet the high demand for September. The position will become clearer by the end of May as parents accept or decline offered places and as late applications are received and processed.
5. The schools within Phase 1 of the expansion programme are outlined in Table 1 below. The recommendation is to make these temporary expansions permanent. This may need to include the expansion of Ryefield, depending on the level of demand and on how and when school place capacity is increased in the neighbouring Ickenham area. It will also involve the provision of new buildings, as none of the schools have the physical capacity for long-term expansion. Statutory consultation processes with key stakeholders, including the governing bodies, for each affected school will be required. Schools cannot be expanded by more than 25% without statutory consultation. In addition, a separate statutory process will need to be followed to change each school's Published Admissions Number as part of the Annual Admissions Arrangements Consultation. Statutory proposals must be consulted upon and determined before the building programme can commence. It is vital that the building programme to provide permanent accommodation is completed as soon as possible in order to reduce the need for temporary accommodation in the interim. Accommodation proposals for permanent expansion have been developed in consultation with schools. External consultants have now been appointed to take the feasibility work forward.

**Table 1**

Schools	Reason for proposal	% Increase in School Capacity
Whitehall Infant & Whitehall Junior	1 form of entry Infant - from 270 places to 360 Junior - from 360 places to 480	33% 33%
Colham Manor Primary	1 form of entry From 598 places to 630	5% (no statutory consultation required, except for change to admission number)
Grange Park Infant & Grange Park Junior	1 form of entry Infant - from 270 places to 360 Junior - from 360 places to 480	33% 33%
Cranford Park Primary	1 form of entry From 630 places to 840	33%
Brookside Primary	1 form of entry From 420 places to 630	50%
William Byrd Primary	1 form of entry From 420 places to 630	50%
Ryefield Primary	Temporary expansion of 1 form of entry for up to 5 years. From 420 places to 570	36%

6. With the exception of Colham Manor Primary School (where the proposed increase would be less than 25%) all of the above schools would require statutory consultation with stakeholders on the expansion of their premises. If authorised by Cabinet the timeline for the statutory consultations will be as outlined in Table 2 below:

**Table 2**

Consultation Action	Date
Stage 1: Consultation with key stakeholders on specific proposals for each school	Statutory minimum 4 weeks consultation: <ul style="list-style-type: none"> <li>Start 11th June 2010</li> <li>End 9th July 2010</li> </ul>
Cabinet Member report to decide whether to proceed to publication of Statutory Notices.	<ul style="list-style-type: none"> <li>Late July or early August 2010</li> </ul>
Stage 2: Publication of Statutory Notices	Statutory consultation period 4 weeks: <ul style="list-style-type: none"> <li>Start 8th Sep 2010</li> <li>End 6th October 2010</li> </ul>
Cabinet Decision on proposals (or Cabinet Member if no objections are received)	<ul style="list-style-type: none"> <li>18th November 2010</li> </ul>

## Phase 2 Programme for 2012/13 and beyond

7. The extremely high births in calendar years 2008 and 2009 will impact on Reception places from September 2012. For subsequent years the GLA have now provided a borough population forecast indicating a prolonged period of births exceeding 4,000 children per annum. This had already been anticipated and reflected in the pupil forecasts produced late last year. Birth statistics received from the ONS and PCT up to 2009, and the GLA's births forecast beyond 2009, is attached at **Appendix 1**.
8. The current indication is that 19 additional forms of entry will be required across the borough. The Phase 1 expansion programme will provide only 7 forms of entry (i.e. 6 permanent & 1 temporary) towards this deficit, and it is therefore necessary to undertake a complete review of the primary estate's capacity in order to find sufficient capacity for Phase 2.
9. It should be noted again that there is the risk that the current migration pressure might not abate by 2012, which could exacerbate the problem. This potential risk means that it would also be wise to draw up contingency plans for additional demand beyond the 19 forms of entry currently anticipated.
10. Funded separately but enabled by BS21, an extra 3 forms of entry is proposed through new provision at the Rosedale campus (currently agreed as 2fe) and the relocation/expansion of Highfield Primary School (an additional fe). The Rosedale development could accommodate a further form of entry (i.e. 3fe). A Cabinet Member decision would be needed to commence the necessary statutory consultation process for the additional form of entry. Any changes to the BS21 programme could, however, affect the viability of the proposals for Rosedale. The central Uxbridge area could provide a 3FE primary school within the RAF Uxbridge site although no agreement has been reached on this proposal. Potentially, in the longer-term, these new developments could provide a total of 7 forms of entry. Taken together with the 6 permanent forms of entry proposed for Phase 1, the remaining deficit of permanent provision would be 6fe, as set out in Table 3.

**Table 3: Possible Configuration of Permanent Provision**

Expected demand for places from September 2012	<b>= 19FE</b>
Phase 1 provision (subject to statutory consultation)	= 6FE
Rosedale 3FE & Highfield 1FE	= 4 FE
Places sought at RAF Uxbridge site	= 3FE
Remaining deficit – to be met by expanding existing schools and further new provision	<b>= 6 FE</b>

11. Although there is a net additional need of 6 forms of entry within Phase 2, the additional provision at Highfield (1 fe) is not expected until 2015. Similarly, the new school at the RAF Uxbridge site (3 fe) might not be available in time. It is therefore apparent that a raft of temporary provisions will also be needed to bridge the gap before those schools became available. Taking into account current proposals, the implications of this are set out at Table 4.

**Table 4; Possible Timings of Permanent and Temporary Provision**

Year	Additional Forms of entry	Cumulative	Action
2010/11	7	7	See Phase 1 schools
2011/12	2	9	Temporary provision at Rosedale College - at 2fe initially (see para. 10)
2012/13	10	19	Phase 2 schools (to be agreed). This would need to include at least 4 temporary expansions, pending new places at RAF Uxbridge & Highfield, in addition to permanent expansions of existing schools. Additional temporary 1fe at Rosedale.
2013/14	-	19	Rosedale College permanent infant accommodation completed.
2014/15	-	19	Permanent new places at RAF Uxbridge to replace temporary provisions (location to be agreed).
2015/16	-	19	Permanent new places at Highfield.(to replace temporary provision)

12. In order to develop a range of options for delivering the additional forms of entry required for September 2012, officers are consulting with other primary schools in the borough, and with diocesan bodies. Key issues in developing the programme for Phase 2 will include:

- The timescales for the BS21 programme in relation to the associated primary projects
- Permanent school expansions
- Temporary school expansions as a bridge to permanent provision elsewhere
- Identifying a new site in the Hayes area
- How the long term provision of places in Ickenham will be delivered
- The nature of the school on the RAF Uxbridge site i.e. a new school delivered through competition or a relocated school.

13. The table below shows the indicative consultation programme for Phase 2. This provisional timetable excludes any consultation processes for delivering new schools through statutory competition rules, which could be proposed when all options have been thoroughly assessed.

Action	Date
Officers to consult schools & diocesan boards, undertake feasibility studies and identify specific options.	June to September 2010
Cabinet or Cabinet Member to authorise statutory consultations on specific proposals for several schools.	October / November 2010
Statutory consultation process.	November 2010 to February 2011
Cabinet Decisions on proposals (or Cabinet Member if no objections are received).	17th March 2011
Work programme (likely to take several years to complete).	March 2011 - onwards

## **Other considerations**

14. The impact of any change to the timetable for the BS21 programme upon the timing of new primary provision also needs to be considered. If there are no changes to the BS21 programme as it stands, permanent primary places will not be available at Rosedale before 2013 and the extra form of entry at Highfield will not be available before 2015. A further year of temporary provision will therefore be needed. The development of the Phase 2 options will therefore need to include some contingency proposals.
15. Running in parallel to the consultation strategy outlined in this report is the preparatory work for the primary school places programme. Decisions on appointment of consultants and procurement processes will be needed.

## **Financial Implications**

The cost implications are significant. An indicative figure of £73m was worked up during the MTFB budget process and was included in the budget report to February Cabinet. This figure is highly provisional, as it had to be developed prior to the identification of sites and schemes.

Costs for particular school projects will depend on local circumstances, and these will become apparent as specific options are firmed up. Some schools will already have some spare spaces whilst others may require a full expansion plus significant enabling alterations. The programme will also include new provision (e.g. that at Rosedale College). The programme of work, and the funding required, will be spread over a number of years.

Funding for both Phases would need to come from several council funding streams including Basic Need (Annual formulaic capital); Section 106; Primary Capital Programme funding; Modernisation (Formulaic Capital). At this stage, local authorities' capital allocations are not known beyond 2010/11. Primary Capital Programme funding is £6.271m in 2010/11, though subsequent years are more likely to be closer to the 2009/10 figure of £3.893m. Formulaic capital for school places (Basic Need) was £2.6m in 2010/11. However, this is Supported Borrowing and is intended to support both primary and secondary place needs.

Further reports to Cabinet will be necessary in 2010 and 2011 in order to seek funding approval for specific programmes of work.

## **EFFECT ON RESIDENTS, SERVICE USERS & COMMUNITIES**

### **What will be the effect of the recommendation?**

The recommendations will begin the statutory consultation processes that are necessary before expanding maintained schools. The expansion of local schools is necessary to meet the growing demand for primary school places resulting from changes to London migration patterns and increased birth rates.

### **Consultation Required**

For Phase 1, some Statutory Consultations would follow Cabinet's approval of the recommendations of this report. Additional consultation on increasing school admission numbers is a separate process and this would be directed through the local Admissions Forum.

For Phase 2, arrangements for preliminary consultations with several schools and stakeholders are being made. Further Statutory Consultations would follow after options are assessed and specific proposals chosen. Any specific proposals will then require Cabinet's approval to begin any Statutory Consultation process.

## **CORPORATE IMPLICATIONS**

### **Corporate Finance**

There is sufficient capital funding currently in place in PCP grant already announced to finance phase 1 of this programme. There is some urgency in progressing this phase of the programme as a portion of PCP grant is 'timebound' and at risk of 'clawback' if not used over the next few months.

However, whilst some resources have been identified to support phase 2, the projected cost indicated in this report significantly exceeds the current annual funding for school places provided by the Department for Education through capital grant and supported borrowing. This is a key funding issue across the whole of London and London Councils has been lobbying the Government to raise awareness and secure additional funding over the medium term for required school places. Hence, it is hoped that Central funding will be provided for urgent places needs, even if this results in resources being diverted from other school's programmes; indeed additional funding was distributed by the Government for the current year for other authorities with severe immediate pressures.

Regardless of availability of additional resources, there is still the legal requirement to provide school places hence Corporate Finance supports the recommendation to commence the statutory consultation process. Given that funding is in place, there would be no adverse impact on the GF revenue account in progressing the 7 form entry expansion associated with phase 1.

Due to the long 'lead-in' time for many school's capital projects, it will be necessary to advance plans for future year' provision of places fairly soon and whilst funding streams are currently uncertain, (as with many other future Council funding streams) there may be significant additional costs if the council has to provide emergency temporary places prior to permanent accommodation being built.

### **Legal**

The School Organisation (Prescribed Alterations to Maintained Schools) (England) Regulations 2007 (as amended) provide that where a Local Education Authority is bringing forward statutory proposals (under s.19 of the Education and Inspections Act 2006) to expand a school then it must consult interested parties, and in so doing, must have regard to the Secretary of State's guidance on "Expanding a Maintained Mainstream School by Enlarging or adding a Sixth Form". Once the consultation process has been completed then Cabinet has the power under the Constitution to determine school organisation proposals where objections have been received, and the Cabinet Member has the delegated power to make that determination if there are no objections.

### **Corporate Property**

The Interim Head of Corporate Landlord has been a member of the working party dealing with the schools expansion programme and is in full agreement with the recommendations

**Relevant Service Groups**

No other service areas should be affected by these recommendations.

**BACKGROUND PAPERS**

NIL

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## REVIEW OF THE LOCAL LIST OF BUILDINGS OF ARCHITECTURAL OR HISTORIC IMPORTANCE

<b>Cabinet Member</b>	Councillor Keith Burrows
<b>Cabinet Portfolio</b>	Planning and Transportation
<b>Officer Contact</b>	Nairita Chakraborty/ Sarah Harper, Planning and Community Services
<b>Papers with report</b>	Appendix 1 – Proposed Local List Appendix 2 – Assessment of new entries suggested during public consultation

### HEADLINE INFORMATION

<b>Purpose of report</b>	The review of the Local List of Buildings of Architectural or Historic Importance has been completed and this report informs Cabinet of the results of the consultation exercises. The report also seeks approval of the revised Local List for adoption (Appendix 1).
<b>Contribution to our plans and strategies</b>	Hillingdon's Emerging Local Development Framework Hillingdon Design & Access Statements Hillingdon Unitary Development Plan (Saved Polices 2007) Sustainable Community Strategy Statement of Community Involvement
<b>Financial Cost</b>	The total costs of advertisement, notification and updating GIS would be approximately £1,100 which will be met from the budget for Planning and Community Services 2010/11.
<b>Relevant Policy Overview Committee</b>	Residents and Environmental Services Policy Overview Committee
<b>Ward(s) affected</b>	All wards in the Borough

### RECOMMENDATIONS:

#### That Cabinet:

1. **Agrees the proposed Local List of Buildings of Architectural or Historic Importance as attached in Appendix 1;**
2. **Instructs officers to notify all the owners/occupiers of the buildings included in the list, and;**
3. **Instruct officers to update the GIS to include the new entries and to provide this information as an online database, available to council staff, councillors, the public and other users.**

## **INFORMATION**

### **Reasons for recommendation**

The Local List of Buildings of Architectural or Historic Importance recognises buildings that are considered to be of local architectural and historical importance that contribute significantly to the unique character and sense of local distinctiveness of the Borough. Between January and February 2010 a borough wide public consultation exercise was undertaken to seek views on a revised Local List. All the comments and suggestions received were considered by officers and assessed using the agreed eligibility criteria and scoring system. A further consultation with owners and occupiers was carried out during March and April 2010. Following this, the draft list has been revised.

### **Alternative options considered**

- Not to revise the existing Local List, leaving buildings worthy of local designation unrecognised and vulnerable to insensitive development, and the concerns of Members and residents unaddressed.

## **SUPPORTING INFORMATION**

1. The London Borough of Hillingdon has an adopted Local List, which pre-dates 1990 and includes limited information on each of the entries. Since that time, a number of the buildings have been statutorily listed; some have been significantly altered, or in extreme cases, demolished. The list, therefore, requires revision to accommodate these changes and to include new additions. A review of the Local List of Buildings of Architectural or Historic Importance was undertaken following Cabinet member approval on 19<sup>th</sup> February, 2009.

2. As part of the adopted review programme, a period of pre-consultation with local councillors, Conservation Area Panels and other local groups, including the Local Strategic Partnership, was agreed. This consultation was carried out during March-May 2009 and a draft Local List was prepared following assessment of all the entries received during this exercise.

3. On the 19<sup>th</sup> November 2009, Cabinet approved the draft Local List for borough wide public consultation. This took place in a six week period between January and February 2010 and was undertaken in accordance with the adopted Statement of Community Involvement.

4. The consultation was widely publicised, including a public notice in the Uxbridge Gazette, an article in the Hillingdon People and posters in all the Libraries and also the Civic Centre. The draft Local List was also made available on the Council's website, together with the agreed eligibility criteria. Drop in sessions, attended by officers were also held in Uxbridge, Hayes End, Ruislip Manor Farm and Northwood (Oakland Gate) Libraries. Letters were also sent to local groups and residents associations inviting their views.

5. Once the responses had been assessed and the draft Local List updated to take account of this, a further consultation was carried out with the owners and occupiers of all the buildings included in the list. These letters were sent through the

post and were addressed to the individual properties to ensure that there would be minimal errors in delivery.

6. The results of the two consultation exercises are detailed below.

### **Summary and assessment of responses to public consultation**

7. There was a positive response to the public consultation exercise, with constructive comments and 30 new suggestions for additions to the list.

8. The Ruislip, Northwood and Eastcote Local History Society noted some anomalies with reference to dates of construction. These have been checked and, where applicable, descriptions have been corrected. The Society also advised that the Ruislip Lido building (Water's Edge Bar) was demolished and rebuilt in 1994-96. The building has been re-assessed and because of its local historical and social links, has been retained on the draft list.

9. Officers were also informed that the Old Post Office building, West Drayton (52 Station Road), proposed in 1990, had not been assessed as part of the review. This has been rectified and the building has been assessed and included in the list.

10. Appendix 2 includes a summary of the additional nominations following the public consultation.

11. A number of requests for buildings to be reconsidered were received. These were re-assessed on the basis of any additional information provided. It was felt that these did not meet the agreed eligibility criteria and have, therefore, not been included on the list. Details of these are included in the following table:

<b>Reconsiderations</b>	<b>Recommendation</b>	<b>Comments</b>
Pete's Cottage, 15-17 High Road, Ickenham	Not to be included	Significantly altered Included within Ickenham Village Conservation Area
Dolce Domum, King Edwards Road, Ruislip	Not to be included	Not enough architectural quality. Included within Ruislip Village Conservation Area
Beddingfield Cottages, West End Road, Ruislip	Not to be included	Substantially altered, not enough architectural quality
Westways Farm, Charville Lane, Ruislip	Not to be included	Not enough architectural quality

12. In addition, supportive comments were also received from public bodies such as Theatres Trust and British Waterways.

### **Summary of responses from owners and occupiers**

13. Following advice from the Council's Legal Team and English Heritage; and as planning policies relating to the Local List would apply to these properties, owners and

occupiers were consulted. This was carried out during March and April 2010. Individual letters and the eligibility criteria were sent to all the properties, together with guidance explaining the implications of inclusion on the list.

14. The response rate was poor and whilst there were two positive responses in support of the Local List, there were nine respondents who voiced their concerns regarding planning restrictions and the possible negative effect on property values. Whilst these comments have been considered, unlike statutory listing, 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 Development Procedure) Order 1995 (as amended). However, Council policies do support the retention and enhancement of buildings which contribute to the Borough's local distinctiveness.

15. Responses were also received with regards to larger privately owned sites. These are summarised in the table below:

<b>Respondent</b>	<b>Comments received</b>	<b>Response</b>
RAF Uxbridge Site (GVA Grimleys)	Objected to the inclusion of Institution Building as it has been proposed for demolition. No objections to the inclusion of other sites.	Given the imminent redevelopment of the site, the Institution Building is excluded from the List. All other sites to remain in the List.
Heathrow Buildings (BAA)	Requested reconsideration of inclusion of Central Control Tower and the Chapel as the context of these buildings has been altered since proposed in 1990. The sites are also being considered for redevelopment.	It is considered that the Central Tower and the Chapel warrant inclusion in the list on the basis of their architectural interest. The description has been amended accordingly.
Laboratory Buildings, Library and Lecture Building (Brunel University)	Objected to the inclusion of the Laboratory buildings as these are 'unsuited for their evolving needs' and the University would be looking at their redevelopment; Library building has undergone substantial internal alterations with a large modern extension on one side and is not eligible for inclusion; reconsider inclusion of only the northern section of the Lecture building as this is the only part which is authentic and 'robust'.	Whilst it is noted, that the buildings proposed have been altered, the degree of internal alteration is of less significance when considering locally important buildings. It is felt that these buildings are good examples of their age, style and design and are associated with the Borough's educational and social history. These should, therefore remain on the Local List.
Ruislip Lido (Water's Edge)	Objected to the inclusion as the original group of Lido buildings were demolished and rebuilt during 1994-96. The buildings are, therefore, modern and lack authenticity.	Whilst the building has been rebuilt, its significance is derived from its association with the Lido. In addition, the new building itself is unique in its architectural design and, therefore, warrants inclusion.

Hayes Cottage Hospital and Stockley Park	Commented on the future planning implications as the building has been extended in the past and would need further alterations.	Local listing is unlikely to have a significant impact on future plans as there are no additional statutory controls over buildings in the Local List. It is, however, a material consideration in determining planning applications and Saved Policies (Sept 2007) Hillingdon Unitary Development Plan would apply.
Douay Martyrs School	Objected to inclusion of the Cardinal Hume Campus, as the buildings are varied and are not unique to the area. Queried which building in particular has been proposed for inclusion.	The proposed building fronts Long Lane. It is typical of its period and architectural style and makes a significant contribution to the street scene and townscape of the area. It should, therefore, remain on the list.
Church of St Jerome, Hayes	Objected to inclusion of the building as future alterations may be difficult to achieve.	The building is robust and unique in its architectural design and acts as a key landmark. The building was proposed in 1990, and it should remain on the list given its townscape and architectural significance.
Corporate Properties	Whilst there were no objections in principle, concerns were raised with regards to planning restrictions that may affect future proposals for these sites.	
Green Spaces and Highways	No comments	

### Revised Local List

16. Following consultation and assessment, the draft list has been revised and the finalised document forms Appendix 1 of this report. The following table summarises the number of suggestions received during the various stages of consultation and the proposed entries for inclusion in the Local List.

Year	Total buildings included in the list	Total buildings proposed	Buildings since listed/demolished	Buildings already listed, included in the local list or not enough information provided	Buildings not satisfying eligibility criteria	Total buildings excluded	Total buildings proposed
1973	107		17		6	23 (17+6)	84 (107-23)
1990		66	6		5	11 (6+5)	55 (66-11)
2009		301		99	49	148 (99+49)	153 (301-148)
<b>Total buildings proposed to be included in the Local List</b>							<b>292</b> (84+55+153)

17. Once adopted, the information will form an online database available to council staff and members, as well as for public use. The development of the database will be undertaken inhouse by the Council's Web Officer with assistance from the Conservation Team. It will contain a location map, photographs and a description of each of the entries. The Council's Geographical Information System (GIS) will also be updated accordingly. Given the requirement of the emerging Heritage Protection Bill for all local authorities to provide and maintain a publicly accessible Historic Environment Record, it is likely that this work will form the basis of this database.

### **Future revisions**

18. The Local List review should be considered as a rolling programme, with updates at regular intervals using the procedure and consultation methodology agreed as part of this exercise.

### **CONCLUSION**

19. In order to protect and promote the Borough's heritage, it is important that the Council continues to maintain and update the Local List of Buildings of Architectural or Historic Importance. Paragraph 15 of the new Planning Policy Statement (PPS 5) Practice Guide states that 'In addition to the national and statutory designation, local authorities may formally identify heritage assets that are important to the area, for example local listing as part of the plan-making process'. The Local List is, therefore, an important tool in identifying such assets within the Borough.

20. The inclusion of a building on the Local List would not necessarily prohibit its future development, but would give the building local recognition based on its architectural, townscape and historic merits. There would be a presumption in favour of retaining these buildings and proposals for new alterations and extensions should take its special architectural and historic interest into account.

### **FINANCIAL IMPLICATIONS**

21. There will be advertisement and notification costs of £1,000, and the cost of updating GIS would be up to £100, which will be contained within Planning and Community Services budgets.

### **EFFECT ON RESIDENTS, SERVICE USERS AND COMMUNITIES**

#### **What will be the effect of the recommendation?**

22. The aims of the recommendations are to recognise buildings and structures which are considered to be of local architectural or historic importance, and which contribute positively to the Borough's local distinctiveness and heritage. Inclusion on the Local List would have no statutory implications for residents, property owners or other stakeholders. Local Listing is, however, a material consideration when decisions are made on planning applications relating to the development and alteration of such buildings. The planning policies contained within the London Borough of Hillingdon

Unitary Development Plan (Saved Policies 27<sup>th</sup> September 2007) and incorporated into the emerging Local Development Framework documents would apply.

### **Consultation carried out or required**

23. The report includes the details of consultation.

## **CORPORATE IMPLICATIONS**

### **Corporate Finance**

24. A Corporate Finance Officer has reviewed the report and the financial implications within it, and is satisfied that the financial implications properly reflect the direct resource implications on the planning service and any wider implications for the Council's resources as a whole.

### **Legal**

25. Consultation must be undertaken when proposals are still at a formative stage, must give sufficient reasons to permit the consultee to make a meaningful response, and must allow adequate time for consideration and response. In considering the consultation responses, decision makers must ensure there is a full consideration of all representations arising including those which do not accord with the officer recommendation. The decision maker must be satisfied that responses from the public are conscientiously taken into account.

26. Fairness and natural justice requires that there must be no predetermination of a decision which goes beyond a legitimate predisposition to a certain conclusion: see *R (Wainwright) v Richmond upon Thames London Borough Council* [2001] EWCA Civ 2062, [2001] All ER (D) 422, and *Bovis Homes Ltd v New Forest District Council* [2002] EWHC 483 (Admin).

27. The recent Planning Policy Statement on Planning for the Historic Environment (PPS 5) provides for greater recognition of non designated heritage assets such as locally listed buildings. Policy HE8 of the document states that 'The effect of an application on the significance of such a heritage asset or its setting is a material consideration in determining the application'.

### **Corporate property**

28. There are few properties on the list that are Council owned and there are no objections to their inclusion in the list.

### **Relevant Service Groups**

29. Relevant service groups were consulted as part of the consultation process, and any comments have been taken into consideration.

## **BACKGROUND PAPERS**

- Cabinet Member report dated 19<sup>th</sup> February, 2009.
- Cabinet report dated 19<sup>th</sup> November, 2009.
- Existing Local List
- Planning Policy Statement 5 (PPS 5): Planning for the Historic Environment, 23<sup>rd</sup> March 2010
- PPS 5 Planning for the Historic Environment: Historic Environment Planning Practice Guide- 23<sup>rd</sup> March 2010
- Heritage White Paper- Heritage protection for 21<sup>st</sup> Century, March 2007, DCMS
- Heritage Bill- April 2008, DCMS
- London Borough of Hillingdon Unitary Development Plan (Saved Policies 27<sup>th</sup> September 2007)
- Statement of Community Involvement, November 2006

## APPENDIX 1: PROPOSED LOCAL LIST

COWLEY								
Building Name/No	Road name	Post code	Ward	Date/Period	Date Proposed	Con Area/ ASLC	Ownership	Serial No
Whitehall Junior School	Cowley Road	UB8 2LX	Uxbridge South	Early C20	2009	NA	Council Owned	001
1 & 2 Manor Lodge	Church Road	UB8 3ND	Brunel	Late C19	1973	Cowley Church CA		002
Huntsmoor Weir	Old Mill Lane (W Side)	UB8 2JH	Uxbridge South	Mid C19	1973	Cowley Lock CA		003

EASTCOTE								
Building Name/No	Road name	Post code	Ward	Date/Period	Date Proposed	Con Area/ ASLC	Ownership	Serial No
Eastcote Place	Azalea Walk, Eastcote	HA5 2EL	Eastcote and East Ruislip	1897	2009	NA		004
High Trees, No 64	Cheney Street	HA5 2SZ	Eastcote and East Ruislip	1904	2009	Eastcote Village CA		005
White Lodge, No 26	Cheney Street	HA5 2TE	Eastcote and East Ruislip	1914-16	2009	NA		006
Keeper's Cottage	Coteford Close, Pinner	HA5 2JA	Eastcote and East Ruislip	C1870	2009	NA		007
Little Mead and The Penthouse (Former Eastcote Point)	Cuckoo Hill	HA5 2BB	Northwood Hills	1896	2009	NA		008
Thatched Cottage	Cuckoo Hill	HA5 2BB	Northwood Hills	1935	2009	NA		009
No 152	Eastcote Road	HA4 8DX	Eastcote and East Ruislip	Post 1950	2009	NA		010
Nos 8-10; Nos 12-22	Field End Road	HA5 2QL	Eastcote and East Ruislip	Mid 19 <sup>th</sup> C	1973; 2009	Eastcote Village CA		011
Artist's Studio, No 22	Field End Road	HA5 2QL	Eastcote and East Ruislip	1938	2009	Eastcote Village CA		012
Field End Cottage, No 24	Field End Road	HA5 2QL	Eastcote and East Ruislip	1856	2009	Eastcote Village CA		013
Signpost at the corner of Bridle Road and Field End Road	Field End Road	HA5 2SL	Eastcote and East Ruislip	Early 20 <sup>th</sup> C	2009	Eastcote Village CA	Council Owned	014
Manor PH, No 144	Field nd Road	HA5 1RJ	Eastcote and East Ruislip	1934	2009	NA		015

Building Name/No	Road name	Post code	Ward	Date/Period	Date Proposed	Con Area/ ASLC	Ownership	Serial No
Champer's Wine Bar, No 184	Field End Road, Eastcote	HA5 1RF	Cavendish	1925	2009	Eastcote Morford Way CA		016
177-195	Field End Road, Eastcote	HA5 1QS	Eastcote and East Ruislip	Early 1930s	1990	NA		017
Cavendish Pavillion/ Lido Catering	Field End Road, Eastcote	HA4 9PG	Cavendish	1914	2009	NA	Council Owned	018
Field End Infant Junior School	Field End Road	HA4 9PQ	Cavendish	1947	2009	NA		019
The Venue PH No 446	Field End Road	HA4 9PB	Cavendish	1920	2009	NA		020
Cowman's Cottage, No 29	Fore Street, Eastcote	HA5 2JB	Eastcote and East Ruislip	C1870	2009	NA		021
Eventide Homes, No 38-60	Fore Street, Eastcote	HA5 2HZ	Eastcote and East Ruislip	Late 1930s	2009	NA	Council Owned	022
Wood Cottages, 124-126	Fore Street, Eastcote	HA5 2NH	Northwood Hills	C1860	2009	NA		023
Warrender Park Gates	Lime Grove, Eastcote	HA4 8RL	Eastcote and East Ruislip, Cavendish	C1870	2009	NA	Council Owned	024
Findon	Southill Lane, Pinner	HA5 2EQ	Eastcote and East Ruislip	1880	2009	Eastcote Village CA		025

HAREFIELD								
Building Name/No	Road name	Post code	Ward	Date/Period	Date Proposed	Con Area/ ASLC	Ownership	Serial No
Little hammonds	Breakspear Road North	UB9 6NE	Harefield	1930	2009	Harefield Village CA		026
Mad Bess Cottage	Breakspear Road North, Uxbridge	UB9 6LZ	Harefield	1875	2009	NA	Council Owned	027
Hope Cottage,	Church Hill	UB9 6DX	Harefield	Late C18- Early C19	1973	Harefield Village CA		028
Stables to S of Manor Court	Church Hill, Harefield	UB9 6AB	Harefield	C18	1973	Harefield Village CA		029
Riverside Cottages (1-4 consec)	Coppermill Lock	UB9 6JA	Harefield	Early to mid C19	1973	Coppermill Lock CA		030
Long Building	Coppermill Lock	UB9 6JA	Harefield	19 <sup>th</sup> C	1990	Coppermill Lock CA		031
White Cottage	Coppermill Lock (Canalside)	UB9 6JA	Harefield	Late C18	1973	Coppermill Lock CA		032

Building Name/No	Road name	Post code	Ward	Date/ Period	Date Proposed	Con Area/ ASLC	Ownership	Serial No
Dairy Farm House	Dairy Farm House Lane	UB9 6QU	Harefield	Mid-Late C18	1973	Harefield Village CA		033
War memorial	Harefield Village Green	UB9 6NP	Harefield		2009	Harefield Village CA	Council Owned	034
The Harefield PH, No 41 -43	High Street, Harefield	UB9 6BY	Harefield	Early-mid C19	1973	Harefield Village CA		035
The Prince Lodge (formerly Prince of Wales PH), No 45-49	High Street	UB9 6BY	Harefield	C19 -C20	1973	Harefield Village CA		036
Wall at r/o 20-24 Merle Avenue adjacent to public footpaths linking Park Lane, Harefield Infant and Junior Schools	High Street, Harefield	UB9 6DG	Harefield	Mid- late C19	1973	Harefield Village CA		037
Harefield Hospital	Hill End Road	UB9 6JH	Harefield	1937	1990	Harefield Village CA		038
Harefield Hospital (Children's Wing)	Hill End Road	UB9 6JH	Harefield	1937	1990	Harefield Village CA		039
Harefield Post Office	Northwood Road	UB9 6PL	Harefield	Early C19	1973	Harefield Village CA		040
Shepherd's Hill House	Northwood Road	UB9 6PT	Harefield	Late C18 or early C19	1973	NA		041
Shepherd's Hill Cottage	Northwood Road	UB9 6PT	Harefield	Early C19	2009	NA		042
The Toll Gate House	Northwood Road (by Shrubs Road)	UB9 6PY	Harefield	C17	1973	NA		043
89 + 91	Park Lane	UB9 6BL	Harefield	C18	1973	Harefield Village CA		044
Barns to N of Colney Farm House, 1 Colney Farm Barn	Park Lane	UB9 6HH	Harefield	Mid C19	1973	Harefield Village CA		045
Barn to N. W of Colney Farm House, 4 Colney Farm Barn	Park Lane	UB9 6HH	Harefield	C18	1973	Harefield Village CA		046
Colney Farm House	Park Lane	UB9 6HH	Harefield	Mid C19	1973	Harefield Village CA		047
Black Jack's Mill	Park Lane, Black Jack's Lock	UB9 6HL	Harefield	C18 + C19	1973	Black Jacks Lock CA		048

Building Name/No	Road name	Post code	Ward	Date/Period	Date Proposed	Con Area/ ASLC	Ownership	Serial No
Harefield Baptist Church	Rickmansworth Road	UB9 6JX	Harefield	1834	1973	Harefield Village CA		049
Barn to E of Springwell Farmhouse	Springwell Lane	WD3 8UW	Harefield	C18	1973	Springwell Lock CA		050
The White House	Summerhouse Lane	UB9 6HX	Harefield	C18	1973	Coppermill Lock CA		051
Ashley and South Cottage	The Green, Harefield Village	UB9 6NP	Harefield	C19	1973	Harefield Village CA		052
Lantern House	Tile Kiln Lane, Uxbridge	UB9 6LU	Harefield	C1970	2009	NA		053

#### HARLINGTON

Building Name/No	Road name	Post code	Ward	Date/Period	Date Proposed	Con Area/ ASLC	Ownership	Serial No
The Red Lion PH, No 287	High Street	UB3 5DG	Heathrow Villages	Mid C19	1973	Harlington Village CA		054
Manor Farm Barn (The Barn)	Manor Lane	UB3 5EQ	Heathrow Villages	C17 or early	1973	Harlington Village CA		055

#### HARMONDSWORTH

Building Name/No	Road name	Post code	Ward	Date/Period	Date Proposed	Con Area/ ASLC	Ownership	Serial No
Warehouse	Bath Road, Harmondsworth	UB7 0DG	Heathrow Villages	1968	1990	NA		056
War Memorial, Harmondsworth Moors	Harmondsworth Moors	UB7 0AS	Heathrow Villages	1995	2009	NA	Council Owned	057
Baptist Church	High Street	UB7 0AH	Heathrow Villages	1884	2009	Harmondsworth Village CA		058
Home Farm buildings, Harmondsworth	High Street, Harmondsworth	UB7 0AY	Heathrow Villages	Victorian	1990	Harmondsworth Village CA		059
The Forge	High Street	UB7 0AQ	Heathrow Villages	Mid 19th C	2009	Harmondsworth Village CA		060
39-43	Holloway Lane	UB7 0AE	Heathrow Villages	Late C19	2009	Harmondsworth Village CA		061
16-22	Meadowlea Close	UB7 0AF	Heathrow Villages	Late C19	2009	Harmondsworth Village CA		062

Building Name/No	Road name	Post code	Ward	Date/Period	Date Proposed	Con Area/ ASLC	Ownership	Serial No
The Old School House	Moor Lane	UB7 0AR	Heathrow Villages	Late C19	2009	Harmondsworth Village CA		063
1	Moor Lane	UB7 0AR	Heathrow Villages	Late C19	2009	Harmondsworth Village CA	Council Owned	064
27-29	Moor Lane	UB7 0AR	Heathrow Villages	Late C19	2009	Harmondsworth Village CA		065
Wall to SW of Harmondsworth Hall	Moor Lane/ Summerhouse Lane	UB7 0BG	Heathrow Villages	C18	1973	Harmondsworth Village CA		066
Bridge Spanning Duke of Northumberland River	Moor Lane	UB7 0AP	Heathrow Villages	Late C19	2009	Harmondsworth Village CA		067
Depot 1: Finesplice	Summerhouse Lane	UB7 0AT	Heathrow Villages	Late C19	2009	Harmondsworth Village CA		068

HAYES								
Building Name/No	Road name	Post code	Ward	Date/Period	Date Proposed	Con Area/ ASLC	Ownership	Serial No
Former HMV offices/ Jupiter House	Blyth Road	UB3 1HA	Townfield	1912	1990	Botwell Thorn EMI CA		069
HMV/EMI Building, Hayes (Botwell)	Blyth Road	UB3 1HA	Townfield	Inter war	1990	Botwell Thorn EMI CA		070
Thorn/EMI Building, Hayes (Botwell)	Blyth Road	UB3 1BW	Townfield	Inter war	1990	Botwell Thorn EMI CA		071
Neptune House	Blyth Road	UB3 1BW	Townfield	1930s	1990	Botwell Thorn EMI CA		072
Yeading Infant and Nursery School	Carlyon Road, Hayes	UB4 0NR	Barnhill	1930s	2009	NA	Council Owned	073
Nos 1-4	Church Green	UB3 2LY	Townfield	Mid- late C19	1973	Hayes Village CA		074
War memorial	Church Green	UB3 2LY	Townfield		2009	Hayes Village CA		075
Wistowe House, No 138	Church Road	UB3 2LW	Townfield	C17 + C19	1973	Hayes Village CA		076
Fountain House Hotel, No 120	Church Road	UB3 2LW	Townfield	Late C19	2009	Hayes Village CA		077
Former Manor House	Church Road	UB3 2PX	Townfield	C17 + C19	1973	Hayes Village CA		078
Kings Arms PH	Coldharbour Lane	UB3 3EG	Townfield	Early 20th C	2009	NA		079

Building Name/No	Road name	Post code	Ward	Date/Period	Date Proposed	Con Area/ ASLC	Ownership	Serial No
Dawley Wall	Dawley Road	UB3 1EE	Botwell	18th – early 19th C	1990	NA		080
St Edmund's Church	Edmund's Close, Hayes	UB4 0HA	Barnhill	1961	2009	NA		081
Banstand, Barra Hall Park	Freeman's Lane, Hayes	UB3 2NH	Townfield	1928	2009	Hayes Village CA		082
2-9 Bell House Cottages	Freeman's Lane, Hayes	UB3 2NL	Townfield	19th C	2009	Hayes Village CA		083
Hayes Library	Golden Crescent, Hayes	UB3 1AQ	Botwell	C1880	2009	NA	Council Owned	084
Hayes Cottage Hospital	Grange Road	UB3 2RR	Townfield	1875	1990	Hayes Village CA		085
Laburnum Villa	Hayes End Road	UB4 8EH	Charville	Mid C19	1973	NA		086
Wall to W of grounds of Laburnum Villa	Hayes End Road	UB4 8EH	Charville	C1837-76	1973	NA		087
Stable building to Home Farm	Hayes End Road	UB4 8EN	Charville	1810 or earlier	1973	NA		088
Home Farm	Hayes End Road	UB4 8EN	Charville	Early to mid 19th C	2009	NA		089
Church of St. Jerome	Judge Heath Lane	UB8 3JU	Botwell	1933/34	1990	NA		090
Brooke House PH, No 240	Kingshill Avenue	UB4 8BZ	Charville	1950	2009	NA		091
St Raphael's RC Church	Morrison Road	UB4 9JP	Barnhill	1961	2009	Barnhill Estate ASLC		092
Nestle Works (Nestle UK LTD), North Hyde Gardens, Hayes (Botwell)	North Hyde Gardens, Hayes	UB3 4RF	Botwell	1930s	1990	NA		093
Warehouses	Silverdale Road, Hayes	UB3 3BN	Townfield	1907	1990	NA		094
Hayes and Harlington Station	Station Road	UB3 4BX	Botwell	1868 and C1920s	2009	NA		095
Old Crown PH, No 81	Station Road	UB3 4BG	Townfield	Mid to late 19th C	2009	NA		096
The Parish Church of St Anselm	Station Road, Hayes	UB3 4DF	Botwell	1926-28	2009	NA		097
Stockley Park (A1.1, 1.2, 2.1, 2.3)	Stockley Park	UB11 1AH	Botwell	1985-87	1990	NA		098
Stockley Park (B3), 5 Longwalk Road	Stockley Park	UB11 1FE	Botwell	1987-90	1990	NA		099
The Arena	Stockley Park	UB11 1ET	Botwell	1988	1990	NA		100

Building Name/No	Road name	Post code	Ward	Date/ Period	Date Proposed	Con Area/ ASLC	Ownership	Serial No
Water Pump	Uxbridge Road	UB10 0NT	Brunel	C 19	2009	NA		101
Nos 832 & 834	Uxbridge Road	UB4 0RR	Barnhill	Early- mid C18	1973	NA		102
Nos 895 & 897	Uxbridge Road	UB10 0NH	Brunel	Early- mid C19	1973	NA		103
Hayes Police Station, No 755	Uxbridge Road	UB4 8HU	Botwell	Inter-war	2009	NA		104
Mecca Bingo Club (Former Savoy Cinema), Nos 468-480	Uxbridge Road, Hayes	UB4 0SD	Barnhill	1939	2009	NA		105
Adam and Eve Pub, No 830	Uxbridge Road, Hayes	UB4 0RR	Barnhill	Inter-war	2009	NA		106
The Grapes, No 362	Uxbridge Road, Hayes	UB4 0HF	Barnhill	Early 20th C	2009	NA		107
The Angel, No 697	Uxbridge Road, Hayes	UB4 8HX	Botwell	Inter-war	2009	NA		108
Yeading Christian Fellowship (Bethel Church)	Willow Tree Lane	UB4 9BB	Yeading	1902		NA		109
Pill Box, Willow Tree Lane, Yeading	Willow Tree Lane	UB4 9UP	Yeading	II World War	1990	NA		110

HILLINGDON								
Building Name/No	Road name	Post code	Ward	Date/ Period	Date Proposed	Con Area/ ASLC	Ownership	Serial No
Mission Hall and The Cottage, No 29 and 31	Colham Green Road	UB8 3QQ	Brunel	Mid C18	1973	NA		111
Prince of Wales PH, No 1	Harlington Road	UB8 3HX	Brunel		2009	Hillingdon Village CA		112
Rosebank and Sunningdale Cottages, 3-25	Harlington Road	UB8 3HX	Brunel	Mid 19 C	2009	Hillingdon Village CA		113
High House, 33 (Formally Hillingdon High School)	Harlington Road	UB8 3HX	Brunel	C18 + C19	1973	NA		114
Walls to N & W of Little London Nursery	Little London Close, Harlington Road	UB8 3UG	Brunel	C19	1973	NA		115
No 1 , (Former Parish Room & Cottage off Uxbridge Road)	Nellgrove Road, Hillingdon Heath	UB10 0SX	Brunel	1884	1973	NA		116

Building Name/No	Road name	Post code	Ward	Date/ Period	Date Proposed	Con Area/ ASLC	Ownership	Serial No
Pield Heath House Convent Schools Western Block (The Cottage)	Pield Heath Road	UB8 3NW	Brunel	Early C19	1973	NA		117
124 – 126	Pield Heath Road	UB8 3NL	Brunel	Early C18 – mid C19	1973	NA		118
The Star PH	Uxbridge Road	UB10 0LY	Hillingdon East	Inter-war	2009	NA		119
Salem Baptist Church	Uxbridge Road, Hayes	UB10 0NH	Brunel	Late 19 <sup>th</sup> C	2009	NA		120
Walls along Vine Lane, Hillingdon Village	Vine Lane	UB10 0BE	Uxbridge North	18 <sup>th</sup> C	1990	Hillingdon Court Park ASLC		121
The Cedars, Vine Lane, Hillingdon Village	Vine Lane	UB10 0NF	Uxbridge North	New office block	1990	Hillingdon Village CA		122

ICKENHAM								
Building Name/No	Road name	Post code	Ward	Date/ Period	Date Proposed	Con Area/ ASLC	Ownership	Serial No
The Buntings, 97-99	Boniface Road	UB10 8BY	Ickenham	Mid 19 <sup>th</sup> C	2009	Ickenham Village CA	Council Owned	123
Glebe View and Manor View Villas, Nos 61-63 and Nos 65-67	Glebe Avenue	UB10 8PD	Ickenham	Late 19 <sup>th</sup> C to early 20 <sup>th</sup> C	2009	NA		124
The Old Fox, 16	High Road	UB10 8LJ	Ickenham	Early 20 <sup>th</sup> C	2009	Ickenham Village CA		125
Part of No 61 (former Congregational Chapel)	High Road	UB10 8LG	West Ruislip	Late C18 or early C19	1973	NA		126
67-69	High Road	UB10 8LQ	West Ruislip	Early- mid C19	1973	NA		127
Soldier's Return PH, No 65	High Road	UB10 8LG	West Ruislip	Late 19 <sup>th</sup> to early 20 <sup>th</sup> Century	2009	NA		128
8 + 10 (Revised to include 6 ad 12)	High Road	UB10 8LJ	Ickenham	C18 + later	1973	Ickenham Village CA		129
89	Long Lane	UB10 8QS	Ickenham	C18	1973	Ickenham Village CA		130
Douay Martyrs School (Cardinal Hume Campus)	86 Long Lane	UB10 8SX	Ickenham	1930s	2009	NA		131
Heath House	Milton Road	UB10 8NU	Ickenham	1920s	2009	Ickenham Village CA	Council Owned	132
Signpost	Swakeleys Road and High Road junction	UB10 8TB	Ickenham	Early 20 <sup>th</sup> C	2009	Ickenham Village CA	Council Owned	133

Building Name/No	Road name	Post code	Ward	Date/Period	Date Proposed	Con Area/ ASLC	Ownership	Serial No
No 2	Swakeleys Road	UB10 8BG	Ickenham	Early C19	1973	Ickenham Village CA		134
Wall to Charles Curran House	Swakeleys Road	UB10 8BG	Ickenham	Early C18	1973	Ickenham Village CA		135
13-15	The Avenue	UB10 8NR	Ickenham	Late Medieval	2009	Ickenham Village CA		136
Risdale Cottages, 1-2	The Green	UB10 8LL	Ickenham	1902	2009	Ickenham Village CA		137

#### LONGFORD

Building Name/No	Road name	Post code	Ward	Date/Period	Date Proposed	Con Area/ ASLC	Ownership	Serial No
Thatched Cottage, No 532	Bath Road, Longford	UB7 0EE	Heathrow Villages	Late C19	1990	Longford Village CA		138
The Loft	Longford Village	UB7 0ES	Heathrow Villages	Late C19	2009	Longford Village CA		139
Colne Cottage	Longford Village	UB7 0ES	Heathrow Villages	Late C19	1990	Longford Village CA		140

#### NORTHWOOD

Building Name/No	Road name	Post code	Ward	Date/Period	Date Proposed	Con Area/ ASLC	Ownership	Serial No
Coal Tax post, South of Batchworth Lane, Herts	Batchworth Lane, Herts	Grid Ref: TQ 083923	Hertfordshire	1861	2009	NA	City of London	141
No 5 (a,b,c,d)	Carew Road, Northwood	HA6 3NH	Northwood	C1910	1990	NA		142
No 9	Carew Road, Northwood	HA6 3NJ	Northwood	C1910	1990	NA		143
No 15	Carew Road, Northwood	HA6 3NJ	Northwood	C1910	2009	NA	Council Owned	144
Oakwood	Catlin's Lane, Pinner	HA5 2EZ	Northwood Hills	1904	2009	Eastcote Village CA		145
No 7	Dene Road, Northwood	HA6 2AE	Northwood	C1910	1990	NA		146
Park Farmhouse	Ducks Hill Road	HA6 2NP	Northwood	C18 + C19	1973	NA		147
Denville Hall, No 62	Ducks Hill Road, Northwood	HA6 2SB	Northwood	1851	2009	NA		148
Tower in frontage of 1-9 Kendall Manor	Ducks Hill Road, Northwood	HA6 2QD	Northwood	C1850	1990	NA		149

Building Name/No	Road name	Post code	Ward	Date/Period	Date Proposed	Con Area/ ASLC	Ownership	Serial No
"Tiptoe" (Former 126 Ducks Hill Road)	25-26 Drakes Drive; Ducks Hill Road, Northwood	HA6 2SJ	Northwood	1920s	1990	NA		150
Crows Nest, No 122	Ducks Hill Road, Northwood	HA6 2SJ	Northwood	1920s	2009	NA		151
Nos 10-16	Eastbury Road	HA6 3AL	Northwood	C1910	1990	Northwood-Frithwood CA		152
Coal Tax Post, Footpath across railway line, from Eastbury Road to Sandy Lodge Way	Eastbury Road	HA6 3BB	Northwood	1861	2009	NA	City of London	153
Cornerways	Green Lane, Northwood	HA6 2UT	Northwood	1935	2009	NA		154
High Beech, No 1	Green Lane, Northwood	HA6 2UY	Northwood	1933	2009	NA		155
Alais Hall (Part of London School of Theology) Wetherby, No 15	Green Lane, Northwood	HA6 2UZ	Northwood	Early 20 <sup>th</sup> C	2009	NA		156
St John's United Reform Church	Hallowell Road	HA6 1DN	Northwood	1914	2009	Old Northwood ASLC		157
Barn to W of Northwood Farmhouse	Hills Lane	HA6 2QL	Northwood	Early C19	1973	NA		158
Joel Street Farm House, (No 151)	Joel Street	HA5 2PD	Northwood Hills	Mid C18	1973	NA		159
Outbuildings to N of Joel Street Farmhouse	Joel Street	HA5 2PD	Northwood Hills	C18	1973	NA		160
Rose Cottage, No 1	Kewferry Road, Northwood	HA6 2WA	Northwood	1861	2009	NA		161
Northwood College	Maxwell Road	HA6 2YE	Northwood	1891-93	2009	NA		162
No 30	Maxwell Road	HA6 2YE	Northwood	1890s	2009	NA		163
No 32	Maxwell Road	HA6 2YE	Northwood	1890s	2009	NA		164
No 24	Murray Road, Northwood	HA6 2YJ	Northwood	1889	2009	NA		165
Tudor House	Northgate, Northwood	HA6 2TH	Northwood	C1920	2009	NA		166
Oakhurst	Northgate, Northwood	HA6 2TH	Northwood	C1920	2009	Copsewood Estate ASLC		167
Coal Tax Post, top of Potter Street	Potter Street		Northwood Hills	1861	2009	NA	City of London	168

Building Name/No	Road name	Post code	Ward	Date/Period	Date Proposed	Con Area/ ASLC	Ownership	Serial No
Coal tax post, rear of playing fields to St Martin's School	Rear of St Martin's School	Grid Ref: TQ 086922	Northwood	1861	2009	NA	City of London	169
Coal Tax post, Rickmansworth Road	Rickmansworth Road	HA6 6GY	Northwood	1861	2009	NA	City of London	170
Horse Trough	Rickmansworth Road, Northwood	HA6 2QN	Northwood	1893-1903	2009	NA	Council Owned	171
The Vane, No 17	The Avenue, Northwood	HA6 2NJ	Northwood	C1920	2009	NA		172
Fair Acre, (No 27-29)	Wiltshire Lane	HA5 2LY	Northwood Hills	C19 rebuilt in 1914-16	1973	NA		173

RUISLIP								
Building Name/No	Road name	Post code	Ward	Date/Period	Date Proposed	Con Area/ ASLC	Ownership	Serial No
No 51	Bury Street	HA4 7SX	West Ruislip	Early- mid C19	1973	Ruislip Village CA		174
Manor Farm Lodge	Bury Street	HA4 7AR	West Ruislip		2009	Ruislip Village CA	Council Owned	175
War Memorial and Horse Trough	Bury Street	HA4 7AR	West Ruislip		2009	Ruislip Village CA	Council Owned	176
Hand pump	Bury Street	HA4 7AR	West Ruislip	1864	2009	Ruislip Village CA	Council Owned	177
The Gables, No 27	Church Avenue, Ruislip	HA4 7HU	West Ruislip	1916	2009	Ruislip Village CA		178
Vicarage, 9	Deborah Crescent, Ruislip	HA4 7SX	West Ruislip	1881	2009	Ruislip Village CA		179
Methodist Chapel	Ducks Hill Road, Ruislip Common	HA4 7TP	West Ruislip	Early- mid C19	1973	NA		180
Ruislip Village Fruiterers, No 38	High Street, Ruislip	HA4 7AN	West Ruislip	Late 1940s	2009	Ruislip Village CA		181
Natwest Bank, No 63	High Street, Ruislip	HA4 8JB	West Ruislip	1930s	2009	Ruislip Village CA		182
Barclays Bank, No 54	High Street, Ruislip	HA4 7AT	West Ruislip	1919	2009	Ruislip Village CA		183
Nos 56-78	High Street, Ruislip	HA4 7AA	West Ruislip	1912	2009	Ruislip Village CA		184
Lloyds TSB Bank PLC, Nos 82-84	High Street, Ruislip	HA4 7AB	West Ruislip	1920s	2009	Ruislip Village CA		185

Building Name/No	Road name	Post code	Ward	Date/Period	Date Proposed	Con Area/ ASLC	Ownership	Serial No
C S Bedford, No 135	High Street, Ruislip	HA4 8JY	West Ruislip	1930s	2009	Ruislip Village CA		186
Fiveways	Ickenham Road	HA4 7BZ	West Ruislip	1912	1973	Ruislip Village CA		187
Dunholme Lodge, No 21	King Edwards Road	HA4 7AE	West Ruislip	1914	2009	Ruislip Village CA		188
13-15	Kingsend, Ruislip	HA4 7DD	West Ruislip	1906	2009	Ruislip Village CA		189
16-18	Kingsend, Ruislip	HA4 7DA	West Ruislip	1908	2009	Ruislip Village CA		190
Middlesex Arms	Long Drive	HA4 0HG	South Ruislip	C 1930	2009	NA		191
8	Manor Road	HA4 7LB	West Ruislip	1916	2009	Ruislip Village CA		192
No 1-3	Manor Way, Ruislip	HA4 8HE	Eastcote and East Ruislip	Early 20th C	1990	Ruislip Manor Way CA		193
No 30-44	Manor Way, Ruislip	HA4 8HD	Eastcote and East Ruislip	Early 20th C	1990	Ruislip Manor Way CA		194
Jersey Court (71-73)	Manor Way, Ruislip	HA4 8HW	Manor	1911	2009	Ruislip Manor Way CA		195
Wodelark's Oak	98, Park Avenue	HA\$ 7UP	Eastcote and East Ruislip	1938	2009	NA		196
No 1-4	Priory Close, Ruislip	HA4 8HP	Manor	Early 20th C	1990	Ruislip Manor Way CA		197
South Ruislip Methodist Church	Queens Walk	HA4 0NL	South Ruislip	1997	2009	NA		198
Queensmead School	Queens Walk	HA4 0LR	South Ruislip	1968	2009	NA		199
Lido Buildings/ Waters Edge	Reservoir Road Ruislip	HA4 7TY	West Ruislip	1930s rebuilt 1994-96	1990	NA		200
Boundary wall to No 9	Sharps Lane, Ruislip	HA4 7JG	West Ruislip	18th C	2009	Ruislip Village CA		201
No 22	Sharps Lane, Ruislip	HA4 7JQ	West Ruislip	1920s	2009	Ruislip Village CA		202
No 120	Sharps Lane, Ruislip	HA4 7JB	West Ruislip	Mid 19th C	2009	Ruislip Village CA		203
Ruislip Gardens Primary School	Stafford Road	HA4 6PD	South Ruislip	1940	2009	NA	Council Owned	204
Chest Tomb	St Martin's Graveyard	HA4 8DG	West Ruislip	1790	2009	Ruislip Village CA	Council Owned	205

Building Name/No	Road name	Post code	Ward	Date/Period	Date Proposed	Con Area/ ASLC	Ownership	Serial No
Chest Tomb and railings (Jason Wilshin)	St Martin's Graveyard	HA4 8DG	West Ruislip	1819	2009	Ruislip Village CA	Council Owned	206
Chest Tomb and railings (Ralph Deane)	St Martin's Graveyard	HA4 8DG	West Ruislip	1819	2009	Ruislip Village CA	Council Owned	207
Celtic Memorial	St Martin's Graveyard	HA4 8DG	West Ruislip		2009	Ruislip Village CA	Council Owned	208
South Ruislip Station	Station Approach, Ruislip	HA4 6TP	South Ruislip	1948	2009	NA	TFL	209
St Mary's Church	The Fairway, South Ruislip	HA4 0SP	South Ruislip	1958-59	2009	NA		210
St Gregory Catholic Church	Victoria Road	HA4 0EG	South Ruislip	1966-67	2009	NA		211
Ruislip Manor Station, Ruislip	Victoria Road	HA4 9AA	Manor	1938	1990	NA	TFL	212
Brackenbridge House	Victoria Road	HA4 0JH	South Ruislip	1957-58	2009	NA	Council Owned	213
New Pond Farm (Ruislip Nursing Home) No 173	West End Road, Ruislip	HA4 6LB	Manor	C1872	2009	NA		214
CO's House, RAF Northolt	201 West End Road	HA4 6NW	South Ruislip	C1910	2009	NA		215
The Bell, No 298	West End Road	HA4 6LS	Manor	1930s	2009	NA		216
Glebe Farm	West End Road, Ruislip	HA4 6QX	West Ruislip	1882	2009	NA		217
14-16	Wood Lane, Ruislip	HA4 6EX	West Ruislip	1915	2009	Ruislip Village CA		218

SIPSON								
Building Name/No	Road name	Post code	Ward	Date/Period	Date Proposed	Con Area/ ASLC	Ownership	Serial No
The Three Magpies PH	Bath Road	TW6 2AU	Heathrow Villages	C18	1973	NA		219
Control Tower, Central Area, Heathrow	Heathrow	TW6 1JJ	Heathrow Villages	1955	1990	NA		22
St. George's Chapel, Central Area, Heathrow	Heathrow	TW6 1BP	Heathrow Villages	1968	1990	NA		221
Sant Nirankari Bhawan, (Former Cottage Hospital)	Sipson Lane, Sipson	UB3 5EU	Heathrow Villages	1884	2009	NA		222
The Plough, No 239	Sipson Road, Sipson	UB7 0HW	Heathrow Villages	Mid 19th C	2009	NA		223
Former Baptist Church, No 228	Sipson Lane, Sipson	UB7 0JG	Heathrow Villages	1901	2009	NA		224

UXBRIDGE								
Building Name/No	Road name	Post code	Ward	Date/Period	Date Proposed	Con Area/ ASLC	Ownership	Serial No
Laboratory Buildings	Brunel University, Uxbridge	UB8 3PH	Brunel	1966	1990	NA		225
Lecture Centre	Brunel University, Uxbridge	UB8 3PH	Brunel	1966	1990	NA		226
Library	Brunel University, Uxbridge	UB8 3PH	Brunel	1966	1990	NA		227
Burr Hall	Chiltern View Road, Uxbridge	UB8 2PF	Uxbridge South	1864	1990	Greenway CA		228
No 31/33	Chiltern View Road, Uxbridge	UB8 2PE	Uxbridge South	Late 19 <sup>th</sup> C	1990	Greenway CA		229
Cottage/ Sluice	Culvert Lane, Uxbridge Moor	UB8 2XB	Uxbridge South	Early 19 <sup>th</sup> C	1990	Uxbridge Moor CA		230
12-14	Gravel hill	UB8 1NZ	Uxbridge North	Late 19th C	2009	North Uxbridge ASLC		231
125 +127 and associated wall	Harefield Road	UB8 1PN	Uxbridge North	Early- mid C19	1973	NA		232
Court House	Harefield Road	UB8 1PQ	Uxbridge North	1907	1990	NA		233
Civic Centre	High Street, Uxbridge	UB8 1UW	Uxbridge South	1970s	1990	NA	Council Owned	234
273	High Street	UB8 1LQ	Uxbridge South	Early C19	1973	Old Uxbridge CA		235
278, 279, 280 + 280A	High Street	UB8 1LQ	Uxbridge South	C18	1973	Old Uxbridge CA		236
81 (formally Flour Mill)	High Street	UB8 1JR	Uxbridge South	C18 + early C19	1973	NA	Council Owned	237
The Old School Club, (W Side)	Hillingdon Road	UB10 0AA	Brunel	Mid C19	1973	NA		238
52-58 (even)	Montague Road	UB8 1QN	Uxbridge North	1848	1973	North Uxbridge ASLC		239
55 + 57	Montague Road	UB8 1QN	Uxbridge North	Early- mid C19	1973	North Uxbridge ASLC		240
59	Montague Road	UB8 1QN	Uxbridge North	Early- mid C19	1973	North Uxbridge ASLC		241
60-64 (even)	Montague Road	UB8 1QN	Uxbridge North	1848	1973	North Uxbridge ASLC		242

Building Name/No	Road name	Post code	Ward	Date/Period	Date Proposed	Con Area/ ASLC	Ownership	Serial No
66 + 68 (Montague Cottages)	Montague Road	UB8 1QN	Uxbridge North	Early- mid C19	1973	North Uxbridge ASLC		243
74 + 76 (Clifton Cottages)	Montague Road	UB8 1QN	Uxbridge North	Early- mid C19	1973	North Uxbridge ASLC		244
Woodbridge House	New Windsor Street, Uxbridge	UB8 2TY	Uxbridge South	1908	1990	NA		245
Swan and Bottle P.H	Oxford Road, Uxbridge	UB8 1LZ	Uxbridge North	Early 18 <sup>th</sup> C	1990	Uxbridge Lock CA		246
59 (Old Stables)	Park Road	UB8 1NN	Uxbridge North	C18	1973	NA		247
93-99 (odd)	Park Road	UB8 1NW	Uxbridge North	1884	1973	North Uxbridge ASLC		248
101-105	Park Road	UB8 1NW	Uxbridge North	Early- mid C19	1973	North Uxbridge ASLC		249
107-117	Park Road	UB8 1NW	Uxbridge North	Early- mid C19	1973	North Uxbridge ASLC		250
Residential Barrack	RAF Uxbridge, Hillingdon Road	UB10 0RY	Uxbridge North	1925	2009	NA		251
Laurence House/ Nursing sisters quarter	RAF Uxbridge, Hillingdon Road	UB10 0RY	Uxbridge North	1932	2009	NA		252
Rifle Range	RAF Uxbridge, Hillingdon Road	UB10 0RY	Uxbridge North	1917-18	2009	NA		253
Group Memorial Stone	RAF Uxbridge, Hillingdon Road	UB10 0RY	Uxbridge North	1958	2009	NA		254
AM boundary markers	RAF Uxbridge, Hillingdon Road	UB10 0RY	Uxbridge North		2009	NA		255
Southgate Pillbox	RAF Uxbridge, Hillingdon Road	UB10 0RY	Uxbridge North		2009	NA		256
St Andrew's Ceremonial Gates	RAF Uxbridge, Hillingdon Road	UB10 0RY	Uxbridge North	1957	2009	NA		257
Mill Building	Rockingham Road, Uxbridge Moor	UB8 2XL	Uxbridge South	Early 19 <sup>th</sup> C	1990	NA		258

Building Name/No	Road name	Post code	Ward	Date/ Period	Date Proposed	Con Area/ ASLC	Ownership	Serial No
Rockingham Bridge	Rockingham Road, Uxbridge Moor	UB8 2UB	Uxbridge South	18 <sup>th</sup> C	1990	NA		259
1a	South Common Road	UB8 1NY	Uxbridge North	Early 20th C	2009	North Uxbridge ASLC		260
71 + 73 and associated forecourt wall	The Greenway	UB8 2PL	Uxbridge South	Early- mid C10	1973	Greenway CA		261
89	The Greenway	UB8 2PL	Uxbridge South	Circa 1840	1973	Greenway CA		262
64, 66, 68	The Greenway	UB8 2PL	Uxbridge South	Early- mid C19	1973	Greenway CA		263
Uxbridge High School	The Greenway	UB8 2PR	Brunel	1907	2009	NA	Council Owned	264
Water Tower	Uxbridge Common, Uxbridge	UB8 1XS	Uxbridge North	1906	1990	North Uxbridge ASLC		265
Charter Place (Block 3), Uxbridge	Vine Street	UB8 1BZ	Uxbridge South	1980s	1990			266
Boat Yard	Waterloo Road, Uxbridge Moor	UB8 2QX	Uxbridge South	19 <sup>th</sup> C	1990	Uxbridge Moor CA		267
1-4	West Common Road	UB8 1NZ	Uxbridge North	Late 19th C	2009	North Uxbridge ASLC		268
7-8	West Common Road	UB8 1NZ	Uxbridge North	Late 19th C	2009	North Uxbridge ASLC		269
4	Windsor Street	UB8 1AB	Uxbridge South	C17 + early C 19	1973	Old Uxbridge CA		270
5, 5a + 5B	Windsor Street	UB8 1AB	Uxbridge South	C17 + C19	1973	Old Uxbridge CA		271
6 + 7	Windsor Street	UB8 1AB	Uxbridge South	Late C17 or early C18	1973	Old Uxbridge CA		272
22 + 23	Windsor Street	UB8 1AB	Uxbridge South	C18	1973	Old Uxbridge CA		273
36	Windsor Street	UB8 1AB	Uxbridge South	1909	1973	Old Uxbridge CA		274
The Fig Tree (The Old Bill), No 49	Windsor Street	UB8 1AB	Uxbridge South	1871	1973	Old Uxbridge CA		275
Uxbridge War Memorial	Windsor Street	UB8 2DA	Uxbridge South	WW I	2009	NA	Council Owned	276

WEST DRAYTON								
Building Name/No	Road name	Post code	Ward	Date/Period	Date Proposed	Con Area/ ASLC	Ownership	Serial No
Elruge House, 12-18 and associated walls	Elruge Close, West Drayton	UB7 7ES	West Drayton	Mid to late 19 <sup>th</sup> C	2009	West Drayton Green CA		277
Wall running along N side of pavement of Old Farm Road from Ferrers Avenue to W end of street	Ferrers Avenue	UB7 7AB	West Drayton	C16	1973	West Drayton Green CA		278
Frays Hall, No 52	Money Lane	UB7 7NX	West Drayton	Early- mid C19	1973	West Drayton Green CA		279
Foundation stone for West Drayton National Schools, West Drayton Library	Station Road	UB7 7JS	West Drayton		2009	NA		280
The Old Post Office, 52	Station Road	UB7 7BT	West Drayton	Early 20 <sup>th</sup> C	1990	NA		281
No 71	The Green	UB7 7PW	West Drayton	C17	1973	West Drayton Green CA		282
No 10-14	The Green	UB7 7PJ	West Drayton	C 1920	2009	West Drayton Green CA		283
Former Rumble's Bakery, No 16	The Green	UB7 7PJ	West Drayton	Mid 19 <sup>th</sup> C	2009	West Drayton Green CA		284
St Catherine's RC Church	The Green	UB7 7NZ	West Drayton	1869	2009	West Drayton Green CA		285

YIEWSLEY								
Building Name/No	Road name	Post code	Ward	Date/Period	Date Proposed	Con Area/ ASLC	Ownership	Serial No
Former Methodist Chapel, 152-156	High Street	UB7 7BE	Yiewsley	1872	1973	NA		286
(Former Town Hall) Key House	High Street, Yiewsley	UB7 7BQ	Yiewsley	C 1930	1990	NA		287
Church of St. Matthew	High Street, Yiewsley	UB7 7QJ	Yiewsley	1898	1990	NA		288
Foundation stone for Colham Wharf, Harrier House	High Street, Yiewsley	UB7 7LD	Yiewsley			NA		289
The George & Dragon Public House	176 High Street, Yiewsley	UB7 7BE	Yiewsley	Late 19 C	2009	NA		290
West Drayton and Yiewsley Railway Station,	Station Approach	UB7 9DY	Yiewsley	1878/9	1973	NA		291
The Hut PH, Old Orchard,	West Drayton Road	UB8 3LH	Yiewsley	C18	1973	NA		292

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## APPENDIX 2: Assessment of new entries suggested during public consultation

Building Name/No	Road name	Ward	Date/ Period	Con Area/ ASLC	Eligibility Criteria				Total	Recommendation and Comments
					Authenticity	Architectural	Townscape	Historic		
<b>EASTCOTE</b>										
Manor Public House	Field End Road	Eastcote and East Ruislip	1934	NA	1	2	2+1		6	To be included
<b>ICKENHAM</b>										
Risdale Cottages	1 & 2, The Green, Ickenham	West Ruislip	1902	NA	1	2	2		5	To be included
The Old Fox	16, High Road	Ickenham	Early 20 <sup>th</sup> C	Ickenham Village CA	1	2	2+1		6	To be included
Signpost	High Road & Swakeleys Road	Ickenham	Early 20 <sup>th</sup> C	Ickenham Village CA	2	2	2		6	To be included
The Buntings	97-99 Boniface Road	Ickenham	Mid 19 <sup>th</sup> C	Ickenham Village CA	1	2	2		5	To be included
Whole Street	Austin's Lane	Ickenham and West Ruislip		Ickenham Village CA						Not to be included Not a building/structure
Heath House	Milton Court	Ickenham	C1920s	Ickenham Village CA	1	2	2		5	To be included
Nos 13 and 15	The Avenue	Ickenham	Late medieval	Ickenham Village CA	1	2	2	2	7	To be included

RUISLIP										
Bridge over River Pinn	St Martin's Approach	Eastcote & East Ruislip	1933	Ruislip Village CA	1			2		Not to be included Not enough architectural or townscape value
Wodelark's Oak	98 Park Avenue, Ruislip	Eastcote and East Ruislip	1938	NA	2	2	1		5	To be included
CO's House,	Westend Road, RAF Northolt	South Ruislip	C1910	NA	1	2		2	5	To be included
Anti aircraft gun platform,	Wealdstone Football Club, Grosvenor Vale	Manor	WW II	NA						Not assessed Unable to assess, not enough information
Post Office	48 High street, Ruislip	West Ruislip	1930s	Ruislip Village CA		2		2	4	Not to be included Substantially altered
Chest Tomb	St Martin's Graveyard	West Ruislip	1790	Ruislip Village CA	3			2	5	To be included
Chest Tomb and railings (Jason Wilshin)	St Martin's Graveyard	West Ruislip	1819	Ruislip Village CA	3			2	5	To be included
Chest Tomb and railings (Ralph Deane)	St Martin's Graveyard	West Ruislip	1819	Ruislip Village CA	3			2	5	To be included
Celtic Memorial	St Martin's Graveyard	West Ruislip		Ruislip Village CA	3			2	5	To be included

Ruislip Village Fruiters	38 High Street Ruislip	West Ruislip	1940s-50s	Ruislip Village CA	1	2	2		5	To be included
Lloyds TSB Bank PLC	82-84 High Street	West Ruislip	Early 20 <sup>th</sup> C	Ruislip Village CA	1	2	2		5	To be included
F J Hinds	104 High Street, Ruislip	West Ruislip	Post war	Ruislip Village CA		2	1		3	Not to be included Modern shop front
C S Bedford	134 High Street	West Ruislip	1930s	Ruislip Village CA	1	2	2		5	To be included
<b>NORTHWOOD</b>										
38	Linksway	Northwood	1930s	Copsewood Estate ASLC	1		2		3	Not to be included Not enough architectural quality
Pine Tree Lodge	Chestnut Avenue, Northwood	Northwood	1913	NA	1	2			3	Not to be included Not enough townscape or historic value.
<b>UXBRIDGE</b>										
St Andrew's Gate	RAF Uxbridge	Uxbridge North	1957	NA	2	2		2	6	To be included
Pillbox associated with the group operations room (Bunker)	RAF Uxbridge	Uxbridge North		NA						Not to be included Associated and curtilage to the Grade I Listed Bunker

Uxbridge War Memorial	Windsor Street	Uxbridge South	1924	NA	2	2	1	2	7	To be included
1a	South Common Road	Uxbridge North	Early 20 <sup>th</sup> C	NA	1	2	1	2	6	To be included
1-4	West Common Road	Uxbridge North	Late Victorian	North Uxbridge ASLC	1	2	2		5	To be included
7-8	West Common Road	Uxbridge North	Mid 19 <sup>th</sup> C	North Uxbridge ASLC	2	2	2		6	To be included
12-14	Grave Hill, Uxbridge	Uxbridge North	Late Victorian	North Uxbridge ASLC	1	2	2		5	To be included
<b>YIEWSLEY</b>										
Old Baptist Church	Colham Avenue	Yiewsley	Early 20 <sup>th</sup> C	NA		2		2	4	Not to be included Substantially altered
George and Dragon PH	176 High Street	Yiewsley	Late 19 <sup>th</sup> C	NA	1	2		2	4	To be included

## SUPPORTING PEOPLE PROGRAMME AND SHELTERED HOUSING

<b>Cabinet Member</b>	Councillor Philip Corthorne
<b>Cabinet Portfolio</b>	Social Services, Health & Housing
<b>Officer Contact</b>	Barry Newitt, Adult Social Care, Health and Housing
<b>Papers with report</b>	None

### HEADLINE INFORMATION

<b>Purpose of report</b>	Standing Orders for procurement raise issues for tendering-out housing support services in sheltered housing because they can serve to adversely disaggregate the holistic housing management and support regime. The report will explain the issue for the services provided by Hillingdon Homes and offer a solution.
<b>Contribution to our plans and strategies</b>	To continue to support service user's independence, assist people to remain in their own homes and prevent calling on statutory responsibilities to provide more extensive – and expensive – services.
<b>Financial Cost</b>	There are no direct costs arising from this report and its recommendation. All costs are contained within Area Based Grant.
<b>Relevant Policy Overview Committee</b>	Social Services, Health and Housing
<b>Ward(s) affected</b>	All

### RECOMMENDATION

That Cabinet enter into a new Service Level Agreement with Hillingdon Homes for the housing related support that they provide as part of their sheltered housing service in their current 21 sheltered housing schemes for an annual sum of £742,106 pro rata for the period 1<sup>st</sup> August 2010 until the operation is brought in-house on 1st October 2010.

### INFORMATION

1. Hillingdon's strategy for sheltered housing includes retention of the traditional and holistic service to council tenants.

2. In July the council's service level agreement with Hillingdon Homes for the housing-related support service it provides at each of the council's sheltered schemes expires. All services should be subjected to market testing, particularly where the contract for them expires. However to tender-out just the support service in sheltered housing would serve to fracture the holistic approach. And in October all Hillingdon Homes' operation are due to come in-house (a decision made by Members at their Cabinet meeting of the 18<sup>th</sup> February 2010; the operative date subsequently brought forward by mutual agreement).
3. Given the short period between the above two events it is the officer's view that best value is secured through seeking agreement to a single tender action in accordance with the Council Constitution Procurement & Contract Standing Orders Schedule H, that is negotiating a new Service Level Agreement with Hillingdon Homes for the housing related support that they provide for the period 1<sup>st</sup> August 2010 until the operation is brought in-house in October 2010 at the same annual magnitude of payment that is being made under the current Agreement, pro-rated for the period. The Appropriate Delegated Officer and Cabinet Member are satisfied that if this course of action is taken Standing Orders will be complied with. And officers will ensure that value for money continues to be obtained.
4. In October, when the operation is brought in-house, running conterminously it is planned to replace the Council's Service Level Agreement with Hillingdon Homes with an in-house service level agreement.

#### **Reasons for recommendation**

5. There are two months between the cessation of the current service level agreement with Hillingdon Homes for the housing support services that it provides at the council's sheltered housing schemes and when the council absorbs Hillingdon Homes' operation. Authority is needed for an interim arrangement for this period.

#### **Alternative options considered**

6. Two alternative options were considered:
  - a) Tendering-out the services would also meet the requirement of Standing Orders of Procurement. However, Hillingdon Homes are currently providing a value for money service which meets the council's objectives for continuous improvements and increased efficiency. Should another contractor have secured the business there would necessarily be a disintegration of the holistic service provided to tenants – which would not represent best value.
  - b) Another option is to let the service lapse after July, and have the council take over the operation then. However, it is thought to be more efficient and effective for all of Hillingdon Homes' operations to be brought in-house at the same time rather than this component be brought-in two months before the rest.

#### **Comments of Policy Overview Committee(s)**

7. None.

#### **Supporting Information**

8. Hillingdon's Strategy for Extra Care and Sheltered Housing includes retention of the traditional service provided by Hillingdon Homes where generally site-based staff offer a

combination of housing management, support and other services: A holistic service to the council's tenants residing in their schemes.

9. The council has a service level agreement with Hillingdon Homes for the housing-related support services provide at each of its 21 sheltered housing services – see Appendix 1. On 31st July 2010 this agreement expires. The terms of the agreement do not allow for (further) extension. However, it is planned for Hillingdon Home's operations to be brought in-house in October.
10. As a principle under the Council's Standing Orders for Procurement all services should be intermittently subjected to competitive tender, or at least market testing. However to tender-out just the sheltered support service in the council's sheltered housing would serve to fracture the holistic approach.
11. Given the short period between the above two events it is officer's view that in this instance best value is secured by seeking agreement to a single tender action in accordance with the Council Constitution Procurement & Contract Standing Orders Schedule H.
12. The recommended single tender action involves the obtaining of a tender from a single contractor, service provider or supplier, the terms, conditions or value of which has been determined by a process of negotiation. Section 7.21 of the Procurement and Contract Standing Orders – Code of Practice allows for the obtaining of such tenders provided that the Appropriate Delegated Officer is satisfied, and has obtained agreement from the appropriate Cabinet Member, that negotiations with a single contractor would be more practical or prudent and that:
  - a) one or more of the criteria stated in paragraph 7.20 are satisfied; and
  - b) there is a sound basis for the negotiation, e.g. similar work carried out under similar circumstances, as a result of competitive tendering; and/or
  - c) there would be a demonstrable financial or other service advantages to the Council, thereby contributing towards meeting the obligation under Standing Order 1.4 to obtain value for money; and/or
  - d) there would be a demonstrable saving in time, when time is of the essence, or achievement of quality where quality is most important
13. The Appropriate Delegated Officer is so satisfied, and has obtained agreement from the appropriate Cabinet Member, on the basis that:
  - a) criteria 7.20 (a) (i) is satisfied: It is not reasonably practicable or prudent in meeting the Council's objectives to obtain competitive tenders or quotations
  - b) there is a sound basis for the negotiation
  - c) there would be a demonstrable service advantages to the Council
  - d) there would be a demonstrable achievement of quality.
14. In 2009 Hillingdon Homes sheltered housing services were assessed as mainly operating at level 'B' against the Supporting People Quality Assessment Framework ('C' being the lowest satisfactory level of performance) and have recently agreed a 1% grant reduction for these services for 2010/11. And officers will continue to ensure that value for money is obtained by applying the West London Supporting People Performance Management Framework, including:

- expecting continuous improvements and increased efficiency of Hillingdon Homes
- monitoring performance through return of prescribed and completed performance forms
- cyclical contract meetings and site visits,

15. In October, when the operation is brought in-house, running conterminously it is planned to replace the service level agreement with Hillingdon Homes with an in-house service level agreement, subject to the same monitoring. The in-house agreement is expected to contain clauses identical to those contained in the current Agreement. Thereupon, for the immediate future under the 'Teckal' case there is a case law exemption to the normal procurement rules, the effect of which is that it is not necessary for us to tender for these services when we then have them provided in-house.

## **Financial Implications**

16. There are no direct financial implications arising from this report's recommendations: Continuing to pay for the sheltered housing services that Hillingdon Homes provide has been budgeted for.

## **EFFECT ON RESIDENTS, SERVICE USERS & COMMUNITIES**

17. What will be the effect of the recommendation? The general objectives of the Supporting People programme are:

- to ensure the delivery of a quality of life and the promotion of independence for the vulnerable people who are users of services
- that services are of a high quality, strategically planned, cost effective and complement care services where present
- that the planning and development of services is needs-led.
- that there is a working partnership of local government, probation, health, voluntary sector organisations, housing associations, support agencies and service users.

18. It is believed that the recommendation will be in the best interests of council tenants and residents in need of sheltered housing services in the future.

## **Consultations Carried Out or Required**

19. Consultation is a standing facet of the Supporting People programme and includes:

- senior council officer representation for at least three of the key client groups for SP on the SP Core Strategy Group.
- Provider and service user representation on the SP Core Strategy Group.
- engagement with Providers through Provider Forums
- engagement with service users through a Service User Forum
- gleaning the views of service users through Focus Group meetings
- informal engagement with community and voluntary groups

20. The recommendation made in this report has been the subject of consideration by the Supporting People Commissioning Body and Hillingdon Homes.

## **CORPORATE IMPLICATIONS**

### **Corporate Finance**

21. Corporate Finance has reviewed this report and is satisfied that any costs associated with the new service level agreement for Hillingdon Homes, for the supply of housing related support services, will be contained within existing budgets.

### **Legal**

22. As mentioned in the comments provided by Corporate Procurement, under paragraph 19 of the Council's Procurement and Contracting Standing Orders – Schedule H Cabinet may approve the recommendation to enter into a further SLA with Hillingdon Homes Ltd from 1<sup>st</sup> August 2010 until the service is brought back in-house in October of this year on the basis that it would not be prudent or practical to invite tenders for this service. It should also be borne in mind that because of the nature of the business relationship that exists between the Council and Hillingdon Homes there is a case law exemption which means that it would not be necessary to go out to tender for this service.

### **Corporate Property**

23. Not applicable

### **Relevant Service Groups**

24. Not applicable

### **Corporate Procurement**

25. In accordance with the Council Constitution, Procurement & Contracting Standing Orders, Schedule H (paragraph 19); Code of Practice, paragraph 7.20, competitive tenders are not required if the Appropriate Delegated Officer is satisfied that it is not reasonably prudent or practicable in meeting the Council's objectives to obtain such competitive tenders.
26. In the context of the specific circumstances relating to the decision to bring the Hillingdon Homes operation back in-house, Corporate Procurement support the recommendation made to award an interim contract with Hillingdon Homes for housing related support services at the sheltered homes listed in Appendix 1.

## **BACKGROUND PAPERS**

27. None

**Appendix 1: Hillingdon Homes' sheltered housing related based services which are contractually part-funded by Supporting People.**

<b>Annual contract value</b>	<b>Service Name</b>
£68,891	Langworth Drive
£57,555	Cobden Close
£54,939	Roberts Close
£45,346	James Court
£43,602	Manor House
£40,986	Barr Lodge
£38,370	The Gouldings
£35,754	Missouri Court
£34,882	Mandela Court
£34,882	Michael Shersby House
£32,265	Darrell Charles Court
£31,393	The Buntings
£27,905	Rylestone
£27,905	Ascott Court
£27,033	Barden Court
£26,161	St Catherines Farm Court
£25,289	Wallis House
£24,417	Sibley Court
£21,801	Childs Court
£21,801	Yiewsley Court
£20,929	Drayton Court
£742,106	All services

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