



**CABINET
AGENDA**
for the meeting
on
16 November 2022
at
6.30 pm

To: Croydon Cabinet Members:

Executive Mayor Jason Perry
Councillor Jeet Bains
Councillor Jason Cummings
Councillor Maria Gatland
Councillor Lynne Hale
Councillor Yvette Hopley
Councillor Ola Kolade
Councillor Scott Roche
Councillor Andy Stranack

Invited participants: All other Members of the Council

A meeting of the **CABINET** which you are hereby summoned to attend, will be held on **Wednesday, 16 November 2022 at 6.30 pm** in **Council Chamber, Town Hall, Katharine Street, Croydon CR0 1NX**

Stephen Lawrence-Orumwense
Monitoring Officer
London Borough of Croydon
Bernard Weatherill House
8 Mint Walk, Croydon CR0 1EA

Democratic Services
democratic.services@croydon.gov.uk
www.croydon.gov.uk/meetings
8 November 2022

Members of the public are welcome to attend this meeting. If you require any assistance, please contact officer as detailed above.

The meeting webcast can be viewed here: <http://www.croydon.public-i.tv/core/portal/home>

The agenda papers are available on the Council website
www.croydon.gov.uk/meetings

AGENDA – PART A

1. **Apologies for Absence**

To receive any apologies for absence from Members.

2. **Disclosure of Interests**

Members and co-opted Members of the Council are reminded that, in accordance with the Council's Code of Conduct and the statutory provisions of the Localism Act, they are required to consider **in advance of each meeting** whether they have a disclosable pecuniary interest (DPI), an other registrable interest (ORI) or a non-registrable interest (NRI) in relation to any matter on the agenda. If advice is needed, Members should contact the Monitoring Officer **in good time before the meeting**.

If any Member or co-opted Member of the Council identifies a DPI or ORI which they have not already registered on the Council's register of interests or which requires updating, they should complete the disclosure form which can be obtained from Democratic Services at any time, copies of which will be available at the meeting for return to the Monitoring Officer.

Members and co-opted Members are required to disclose any DPIs and ORIs at the meeting.

- Where the matter relates to a DPI they may not participate in any discussion or vote on the matter and must not stay in the meeting unless granted a dispensation.
- Where the matter relates to an ORI they may not vote on the matter unless granted a dispensation.
- Where a Member or co-opted Member has an NRI which directly relates to their financial interest or wellbeing, or that of a relative or close associate, they must disclose the interest at the meeting, may not take part in any discussion or vote on the matter and must not stay in the meeting unless granted a dispensation. Where a matter affects the NRI of a Member or co-opted Member, section 9 of Appendix B of the Code of Conduct sets out the test which must be applied by the Member to decide whether disclosure is required.

The Chair will invite Members to make their disclosure orally at the commencement of Agenda item 3, to be recorded in the minutes.

3. **Minutes of the Previous Meeting**

To approve as a correct record, the minutes of the previous meeting held on 12 October 2022. **(To Follow)**

4. **Urgent Business (If any)**

To receive notice of any business not on the agenda which in the

opinion of the Chair, by reason of special circumstances, be considered as a matter of urgency.

5. Scrutiny Stage 1 and 2 (Pages 9 - 32)

Stage 1

The Stage 1 report details recommendations that have been developed from the Scrutiny and Overview Committee and its Sub-Committees since the last Cabinet meeting and these are provided in Appendix A.

The Council's Constitution requires that an interim or full response is provided within two months of this Cabinet meeting.

Stage 2

This report invites the Cabinet to approve the full response reports arising from the Stage 1 reports presented to the Cabinet meeting held on 21 September 2022, including:

- Action plans for the implementation of agreed recommendations, or
- Reasons for partially accepting or rejecting the recommendations

and that these be reported to the Scrutiny and Overview Committee or relevant Sub-Committees.

6. Executive Mayor's Business Plan (Pages 33 - 76)

This report presents the Executive Mayor's Business Plan 2022-26 for adoption. This will be the Council's core strategic document setting out its objectives and priorities for the next four years.

It reflects the Executive Mayor's manifesto pledges and priorities, as set out in a report to Cabinet in June 2022. It also includes actions to strengthen governance and management systems, achieve financial and operational sustainability and complete the transformation of the Council.

7. Regina Road, Norwood (Pages 77 - 156)

This report proposes action to begin the process of addressing the current and recurring unsatisfactory situation at the Regina Road estate where three ageing tower blocks require intervention to ensure modern social housing fit for the 21st Century.

8. The Violence Reduction Network's Strategic Assessment 2022 (Pages 157 - 220)

The attached report provides the yearly Strategic Assessment (SA), which is an analytical document where specific recommendations are made to ensure the priorities highlighted in the Community Safety Strategy are to be reached or amended where necessary in reducing crime and anti-social behaviour (ASB) in the borough.

9. A Public Space Protection Order (PSPO) in Croydon Town Centre
(Pages 221 - 278)

Cabinet to receive a report on the outcome of the consultation with members of the public and partners on implementing a PSPO in Croydon Town Centre, the process for making a PSPO, the proposed area which the PSPO would cover, and the activities which it is proposed the PSPO should restrict, and to seek approval for the making of a PSPO in Croydon Town Centre.

10. Croydon Safeguarding Children Partnership Annual Report 2021-2022 (Pages 279 - 324)

This annual report covers the financial year April 2021 - March 2022. It is a public facing document which will be published on the CSCP website.

11. Croydon Safeguarding Adult Board Draft Annual Report 2021/22
(Pages 325 - 370)

The purpose of the attached Croydon Safeguarding Adults Board (CSAB) Annual Report is to detail the activity and effectiveness of the CSAB between 1 April 2021, to 31 March 2022.

12. Waste Collection and Street Cleaning Contract (Pages 371 - 384)

The purpose of the attached report requests approval by Cabinet **not** to extend the current waste and street cleansing contract with Veolia, following a review of the proposed requirements by the contractor to support an extension.

13. South London Waste Plan Development Plan Document - Adoption
(Pages 385 - 508)

The attached report represents the final stage in the progression of the preparation of the joint South London Waste Plan Development Plan Document to adoption. It will then form part of the Council's Planning Policy Framework to spatially manage waste and be used to determine related planning applications.

14. Improving Procurement Decision-making and Governance (Pages 509 - 520)

The attached report sets out the recommendations and actions to be

taken to simplify, accelerate and improve procurement decision-making for contract spend. An Annual Procurement Plan (APP) will enable earlier engagement with the Executive Mayor and Cabinet Members, improving the influence for the strategic approach to commissioning and procurement and streamlining the decision-making process.

15. Contract Management Framework (Pages 521 - 542)

The Executive Mayor, in Cabinet, is invited to approve the adoption of the Contract Management Framework, as set out in the report and the associated appendices.

16. Exclusion of the Press and Public

The following motion is to be moved and seconded where it is proposed to exclude the press and public from the remainder of a meeting:

“That, under Section 100A(4) of the Local Government Act, 1972, the press and public be excluded from the meeting for the following items of business on the grounds that it involves the likely disclosure of exempt information falling within those paragraphs indicated in Part 1 of Schedule 12A of the Local Government Act 1972, as amended.”

PART B AGENDA

17. Waste Collection and Street Cleaning Contract (Pages 543 - 578)

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Agenda Item 5

REPORT TO:	CABINET 16 November 2022
SUBJECT:	STAGE 1: RECOMMENDATIONS ARISING FROM SCRUTINY (OCTOBER 2022)
LEAD OFFICERS:	JANE WEST - EXECUTIVE DIRECTOR - RESOURCES ADRIAN MAY – INTERIM HEAD OF DEMOCRATIC SERVICES & SCRUTINY
LEAD MEMBER:	COUNCILLOR ROWENNA DAVIS CHAIR, SCRUTINY AND OVERVIEW COMMITTEE
CABINET MEMBER:	JASON PERRY, EXECUTIVE MAYOR OF CROYDON
WARDS:	ALL
FINANCIAL IMPACT The Scrutiny recommendations to the Executive (Appendix A) may have financial implications. Following the recommendations being received at Cabinet, the Executive will identify and consider any financial implications as part of their response. If any recommendation is subsequently progressed for consideration and decision by the Executive Mayor in Cabinet, full financial, legal and equalities implications would be presented.	
FORWARD PLAN KEY DECISION REFERENCE: Not a key decision	

The Executive Mayor has the power to make the decisions set out in the recommendations contained within this report:

RECOMMENDATIONS

The Executive Mayor in Cabinet is asked to:

1. Receive the recommendations arising from the meeting of the Scrutiny & Overview Committee held on 11 October (Appendix A).
2. To provide a substantive response to the recommendations (a Scrutiny Stage 2 Report) within two months (i.e. at the next available Cabinet meeting on 25 January 2023).

2. STAGE 1: RECOMMENDATIONS ARISING FROM SCRUTINY

- 2.1 Recommendations that have been developed from the Scrutiny and Overview Committee and its Sub-Committees since the last Cabinet meeting are provided in Appendix A. The constitution requires that an interim or full response is provided within 2 months of this Cabinet meeting.

3. CONCLUSIONS FROM COMMITTEE/SUB-COMMITTEE MEETINGS

- 3.1 In order to provide additional context for the Cabinet, a summary of the conclusions reached by the Scrutiny & Overview Committee or relevant Sub-Committee follows.

Scrutiny & Overview Committee – 6 September 2022

Community Safety Partnership

- 3.2 Subsequent to its review of the Community Safety Partnership at its meeting on 6 September, Councillor Tamar Nwafor suggested to the Scrutiny & Overview Committee that the training of champions within communities across the borough to spot the signs of domestic abuse, should be put forward for consideration in the preparation of the forthcoming Violence Against Women and Girls Strategy. This proposal was endorsed by the Committee at its meeting on 11 October 2022.

Scrutiny & Overview Committee – 11 October 2022

Council Tax Enforcement, Collection & Recovery

- 3.3 The Committee thanked the South West London Law Centre and the Croydon Citizens Advice Bureau for their support in helping the Committee to prepare for this item, through convening a community meeting to hear directly from residents about their experience of Council Tax Enforcement. The Committee also welcomed the submissions put forward from these organisations and agreed to request that a response is provided by the Administration to address the issues raised.
- 3.4 The Committee would also like to put on record its thanks to the Head of Payments, Revenue, Benefits and Debt, Katherine Black, and her team for their engagement with the scrutiny process. The sensitivity displayed at the community meeting to the often upsetting evidence provided was commendable and their subsequent response to address the issues raised should be held up as an example of best practice.
- 3.5 From its review of Council Tax enforcement, the Committee identified that a relatively cost effective means of improving the service would be to review the wording of correspondence sent to residents in Council Tax arrears, as the feedback received at the community meeting would suggest that it could be misinterpreted as being more final than the Council's collection processes actual were.

- 3.6 Similarly, the Committee would recommend that information provided on the Council's website is also reviewed to ensure that it was accessible for a range of literacy levels and prominently displayed the support and advice that was available for residents facing financial difficulty.
- 3.7 The Committee was keen to seek further evidence that Council services worked together to support residents with multiple needs. It was agreed that there needed to be a mechanism in place that would demonstrate to all Members that services cooperated effectively for the benefit of residents.

Call-In: Mayor in Cabinet Decision on Temporary Workers Staffing Contract

- 3.8 In reviewing the Call-In request made on the Temporary Workers Staffing Contract, the Committee concluded that evidence it received in the report responding to the call-in, together with the evidence heard from the Cabinet Member for Finance and officer sat the committee meeting, provided sufficient reassurance that the issues raised had been addressed. As such it was agreed that no further action was necessary and the decision could proceed with immediate effect.
- 3.9 However, in considering the call-in the Committee also concluded that there were wider issues raised that needed to be addressed. One such issue was the Council application of section 12A of the 1972 Local Government Act regarding the provision of withheld information in Committee reports. The Committee agreed that there seemed to be a lack of clarity over the exact requirements of this provision and that further guidance was required for both Members and report authors to understand what information could and could not be disclosed.
- 3.10 Another key issue raised by the Committee was the information collected by the Council to evaluate the success of its contracts. There seemed to be an emphasis towards the purely financial aspects of contracts, but the Committee agreed that the evaluation process needed to include a qualitative framework as well as standard for all contracts awarded.

4. CONSULTATION

- 4.1 The recommendations were developed from the deliberations of either the Scrutiny & Overview Committee or one of its Sub-Committees.

5. PRE-DECISION SCRUTINY

- 5.1 The recommendations set out in the appendix to this report directly arise from Scrutiny.

6. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 6.1 There are no financial implications arising directly from the content of this report. Please see Finance Impact Section above.

7. LEGAL CONSIDERATIONS

- 7.1 The Head of Litigation and Corporate Law comments on behalf of the Director of Law and Governance that the recommendations are presented to Cabinet in accordance with the Constitution.
- 7.2 This requires that the Scrutiny report is received and registered at this Cabinet Meeting and that a substantive response is provided within 2 months (i.e. **Cabinet – 25 January 2023** is the next available meeting).

Approved by Sandra Herbert, Head of Litigation & Corporate Law on behalf of the Director of Law and Governance & Deputy Monitoring Officer

8. EQUALITIES IMPACT

- 8.1 There are no equalities implications arising directly from the content of this report, the report received recommendations from scrutiny, but no decision for recommendation.

9. HUMAN RESOURCES IMPACT

- 9.1 There are no human resource implications arising directly from the contents of this report

10. ENVIRONMENTAL IMPACT

- 10.1 There are no environmental implications arising directly from the contents of this report, the report received recommendations from scrutiny, but no decision for recommendation.

11. CRIME AND DISORDER REDUCTION IMPACT

- 11.1 There are no crime and disorder implications arising directly from the contents of this report, the report received recommendations from scrutiny, but no decision for recommendation.

12. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 12.1 There is a statutory requirement for Cabinet to receive the recommendations made by Scrutiny.

13. OPTIONS CONSIDERED AND REJECTED

- 13.1 None

14. DATA PROTECTION IMPLICATIONS

- 14.1 **WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?**

There are no Data Protection implications at this stage, but that the situation will be reviewed again at Stage 2 when Cabinet provide their response to the proposed recommendations.

14.2 HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN COMPLETED?

No.

CONTACT OFFICER:

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APPENDICES:

Appendix A – Recommendations from Scrutiny

BACKGROUND DOCUMENTS:

Meeting of the Scrutiny & Overview Committee held on 6 September 2022

<https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=166&MIId=2925&Ver=4>

Meeting of the Scrutiny & Overview Committee held on 11 October 2022

<https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=166&MIId=3437&Ver=4>

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Appendix 1 - Scrutiny and Overview Committee, Item: Community Safety Partnership, 7 September 2022

Subsequent additional recommendation:

Recommendation Number	Recommendation	Political Lead	Officer Lead
Recommendation 1	That officers are asked to investigate the potential for introducing a scheme to train Domestic Abuse Champions within local communities across the borough as an action in the forthcoming Violence Against Women and Girls Strategy.	Councillor Ola Kolade	Kristian Aspinall

Appendix 2 - Scrutiny and Overview Committee, Item: Council Tax Recovery, Collection and Enforcement, 11 October 2022

Recommendation Number	Recommendation	Political Lead	Officer Lead
Recommendation 1	That the Administration provides a response to the submissions of the South West London Law Centre and the Croydon CAB made at the Scrutiny and Overview Committee meeting, addressing the issues raised in these submissions.	Councillor Jason Cummings	Catherine Black
Recommendation 2	That officers are asked to review the literacy of formal communication with residents to ensure they meet best practice in terms of accessibility.	Councillor Jason Cummings	Catherine Black
Recommendation 3	That officers are asked to review and, subject to national requirements, amend the wording on the Taking Control of Good Notices, to ensure they reflect the Council's own approach to enforcement.	Councillor Jason Cummings	Catherine Black
Recommendation 4	That the Cabinet Member for Finance writes jointly to all three Croydon MPs asking them to: - <ol style="list-style-type: none"> 1. Champion in Parliament changing the legislated wording of the 'Taking Control of Goods Notices' and 2. Champion in Parliament changing the legislation around enforcement, including the requirement preventing pay arrangements being reached following a summons being issued. 	Councillor Jason Cummings	Catherine Black
Recommendation 5	That when they are next reviewed, officers are asked to ensure that the key performance indicators for Council Tax service present both a quantitative and qualitative overview.	Councillor Jason Cummings	Catherine Black

<p>Recommendation 6</p>	<p>That officers are asked to review the Council’s website to ensure that;</p> <p>a) residents’ rights are clearly set out, including how to make a complaint,</p> <p>b) that advice and hardship services are signposted and</p> <p>c) the criteria for funds, such as the Hardship Fund, are clearly explained.</p>	<p>Councillor Jason Cummings</p>	<p>Catherine Black</p>
<p>Recommendation 7</p>	<p>As part of the wider improvement journey of the Council, consideration is given to the evidence that can be provided to reassure Members that there is improved collaboration across services to support residents with multiple needs.</p>	<p>Executive Mayor Jason Perry</p>	<p>Katherine Kerswell</p>

Appendix 3 - Scrutiny and Overview Committee, Item: Call-In - Mayor in Cabinet Decision on Temporary Workers Staffing Contract, 11 October 2022

Recommendation Number	Recommendation	Political Lead	Officer Lead
Recommendation 1	<p>That the Monitoring Officer be asked to</p> <ul style="list-style-type: none"> a) review the Council position on the disclosure of information to ensure that there is a presumption toward publication, unless doing so would present an obvious legal risk, and b) provide clear, practical guidance on what information should be provided in Part A and B reports to provide clarity for both report authors and Members. 	Councillor Jason Cummings	Stephen Lawrence-Orumwense
Recommendation 2	<p>That the Monitoring Officer be asked to review the provision of legal guidance contained in reports to ensure: -</p> <ul style="list-style-type: none"> a) The potential risks and their mitigations of a decision are clearly explained and avoid ambiguity, and b) Where a confidential report is required, there needs to be a clear explanation of the grounds for this in the public part of the agenda. 	Councillor Jason Cummings	Stephen Lawrence-Orumwense
Recommendation 3	<p>That all Members are offered training on what information should be available in Parts A and B of a meeting and why.</p>	Councillor Jason Cummings	Stephen Lawrence-Orumwense

Recommendation 4	That any contracts awarded by the Council need to have a qualitative framework in place to ensure that an evaluation can be made on the success of the contract beyond the purely financial, and that staff from a variety of levels are included in this process	Councillor Jason Cummings	Scott Funnell
Recommendation 5	That officers are asked to proactively track data on how many times individual staff contracts are re-extended to be able to better evaluate the service.	Councillor Jason Cummings	Dean Shoesmith
Recommendation 6	That officers are asked to engage with organisations including the Greater London Employment Forum when preparing the People Strategy.	Councillor Jason Cummings	Dean Shoesmith
Recommendation 7	That the Chair of Scrutiny is given the opportunity to input into the latest constitutional review, where appropriate.	Councillor Jason Cummings	Stephen Lawrence- Orumwense

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REPORT TO:	CABINET 16 November 2022
SUBJECT:	Scrutiny Stage 2 Responses to Recommendations arising from: Scrutiny Streets, Environment and Homes Sub-Committee on 20 July 2022 and Scrutiny and Overview Committee on 21 July 2022
LEAD OFFICER:	Stephen Lawrence-Orumwense (Monitoring Officer) Adrian May – Interim Head of Democratic Services
CABINET MEMBERS:	Executive Mayor Cllr Hale, Deputy Mayor and Cabinet Member for Homes Cllr Roche, Cabinet Member for Streets and Environment Cllr Bains, Cabinet Member for Planning and Regeneration Cllr Cummings, Cabinet Member for Finance
WARDS:	All
FINANCIAL IMPACT The recommendations in the appendices to this report may have financial implications and as each recommendation accepted is developed, the financial implication will be explored and approved.	
FORWARD PLAN KEY DECISION REFERENCE NO: This is not a key decision.	

The Executive Mayor, in Cabinet, has the power to make the decisions set out in the recommendation below:

1. RECOMMENDATION

1.1 To approve the response and action plans attached to this report at Appendix 1, 2, 3, and 4 and that these be reported to the Scrutiny and Overview Committee or relevant Sub-Committees.

2. EXECUTIVE SUMMARY

2.1 This report invites the Cabinet to approve the full response reports arising from the Stage 1 reports presented to the Cabinet meeting held on 21 September 2022, including:

- Action plans for the implementation of agreed recommendations, or
- Reasons for partially accepting or rejecting the recommendations

and that these be reported to the Scrutiny and Overview Committee or relevant

Sub-Committees.

- 2.2 The Constitution requires that in accepting a recommendation, with or without amendment, from a Scrutiny and Overview Committee or Sub-Committee, the Cabinet shall agree an action plan for the implementation of the agreed recommendations and shall delegate responsibility to an identified officer to report back to the Scrutiny and Overview Committee or Sub-Committee, within a specified period, on progress in implementing the action plan.

3. SCRUTINY RECOMMENDATIONS

- 3.1 The Scrutiny recommendations are contained in the schedule in the appendix to this report.
- 3.2 The detailed responses, including reasons for rejected recommendations and action plans for the implementation of agreed recommendations are also contained in the appendix.

4. CONSULTATION

- 4.1 The recommendations have been developed from the deliberations of either the Scrutiny and Overview Committee or one of its Sub-Committees.
- 4.2 The recommendations in the appendix to this report may involve further consultation and as each recommendation is developed, these implications will be explored and approved.

5 PRE-DECISION SCRUTINY

- 5.1 The recommendations in the appendix to this report are the result of Pre-Decision Scrutiny.

6. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 6.1 The recommendations in this report may have a financial implication. Those recommendations that have been initially accepted will need to be further assessed in terms of affordability, before progressing to possible decision and implementation.

7. LEGAL CONSIDERATIONS

- 7.1 The Constitution requires that Cabinet both receives recommendations from Scrutiny Committees and responds to the recommendations within two months of their receipt.

8. HUMAN RESOURCES IMPACT

- 8.1 The recommendations in the appendix to this report may have a Human Resources impact and as each recommendation is developed these implications will be explored and approved.

9. EQUALITIES IMPACT

9.1 The recommendations in the appendix to this report may have an Equalities impact and as each recommendation is developed, these implications will be explored and approved.

10. ENVIRONMENTAL IMPACT

10.1 The recommendations in the appendix to this report may have an Environmental impact and as each recommendation is developed, these implications will be explored and approved.

11. CRIME AND DISORDER REDUCTION IMPACT

11.1 The recommendations in the appendix to this report may have a Crime and Disorder reduction impact and as each recommendation is developed, these implications will be explored and approved.

12. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

12.1 These are contained in the appendix to this report.

13. OPTIONS CONSIDERED AND REJECTED

13.1 These are contained in the appendix to this report.

CONTACT OFFICER:

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APPENDICES:

Appendix 1: Sustainable Communities, Regen & Econ Recovery Directorate Overview
Appendix 2: Revocation of Croydon Suburban Design Guide Supp. Planning Doc 2
Appendix 3: Housing Directorate Overview
Appendix 4: Opening the Books Review

BACKGROUND DOCUMENTS:

Report to Streets Environment & Homes Committee on 20 July 2022
<https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=170&MId=3206&Ver=4>

Report to Scrutiny & Overview Committee on 21 July 2022
<https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=166&MId=3213&Ver=4>

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Appendix 1 - Sustainable Communities, Regeneration & Economic Recovery Directorate Overview

SCRUTINY RECOMMENDATION	CONCLUSIONS	DEPARTMENT AND CABINET MEMBER RESPONDING	ACCEPTED / PARTIALLY ACCEPTED / REJECTED (inc. reasons for rejection)	IDENTIFIED OFFICER	ANY FINANCIAL IMPLICATIONS	TIMETABLE FOR IMPLEMENTATION OF RECOMMENDATIONS IF ACCEPTED (ie Action Plan)	DATE OF SCRUTINY MEETING TO REPORT BACK
Report: Sustainable Communities, Regeneration & Economic Recovery Directorate Overview (Considered by Streets Environment & Homes Committee on 20 July 2022)							
1. The Sub-Committee recommended that the information on the Council Website around how to report waste collection issues and for the option to 'make an enquiry' be reviewed and made more prominent.	The Sub-Committee were of the view that it was too difficult to report missed [bin / refuse] collections in some cases and that this should be improved.	Cllr Roche, Cabinet Member for Streets and Environment	Accepted The council's homepage has been updated and "Bin issues" is one of the priority services shown	Nick Hibberd, Corporate Director of Sustainable Communities			
2. The Sub-Committee recommended better data collection on areas where there were repeated missed waste collections relating to obstructions or narrow roads to inform a more proactive approach that was less reliant on reporting.	The Sub-Committee were of the view that more work needed to be done to improve trust in waste collection services and to improve the perception that services were improving and providing value for money to residents.	Cllr Roche, Cabinet Member for Streets and Environment	Accepted There will be an internal review of information and process using existing technology	Nick Hibberd, Corporate Director of Sustainable Communities	None	February 2023	
3. The Sub-Committee recommended that the Cabinet Member for Streets and Environment investigate pilots on waste collection trails for flats above shops.	The Sub-Committee concluded that waste collections for flats above shops were an issue and solutions on this should be fed into the review of the waste contract.	Cllr Roche, Cabinet Member for Streets and Environment	Partially Accepted Agreed in principle, however options exploration and solutions may not be in available budgets. To be explored.	Nick Hibberd, Corporate Director of Sustainable Communities	Will be progressed if within existing budgets and affordability consideration.	March 2023	

SCRUTINY RECOMMENDATION	CONCLUSIONS	DEPARTMENT AND CABINET MEMBER RESPONDING	ACCEPTED / PARTIALLY ACCEPTED / REJECTED (inc. reasons for rejection)	IDENTIFIED OFFICER	ANY FINANCIAL IMPLICATIONS	TIMETABLE FOR IMPLEMENTATION OF RECOMMENDATIONS IF ACCEPTED (ie Action Plan)	DATE OF SCRUTINY MEETING TO REPORT BACK
4. The Sub-Committee recommended that the Council produce a Litter Strategy in line with good practice.		Cllr Roche, Cabinet Member for Streets and Environment	Partially Accepted Agreed in principle, – pending identification of sufficient resources or available commissioning budget.	Nick Hibberd, Corporate Director of Sustainable Communities	Officers to cost a project to develop and implement a litter strategy	Resource dependent	
5. The Sub-Committee recommended Ward Councillor visits to assess street cleaning grading were resumed.	The Sub-Committee concluded that there should be co-ordination between waste collection and street cleansing schedules to improve perceptions of street cleanliness and that this should be fed into the review of the waste contract. The Sub-Committee were pleased to hear that the option of bringing the waste contract in-house was one of the options being appraised as part of the forthcoming review of the contract.	Cllr Roche, Cabinet Member for Streets and Environment	Partially Accepted The Council's contract monitoring team undertake inspections of works completed by the contractor to assess whether street cleansing activity is being undertaken in line with the contract specification. Whilst the recommendations is not fully accepted, Officers are happy and available to meet with Ward Cllrs on site as necessary to discuss local concerns and specific identified issues	Nick Hibberd, Corporate Director of Sustainable Communities			
6. The Sub-Committee requested clarity on timescales for the new parking strategy and for information on how this would contribute to over net zero plans.	The Sub-Committee concluded that there was significant strain on parking income and that a new parking strategy was needed to incorporate current trends in behaviours and the adoption of low emission vehicles.	Cllr Roche, Cabinet Member for Streets and Environment	Accepted A transformation project is being developed to review the current parking policy.	Nick Hibberd, Corporate Director of Sustainable Communities		It is anticipated a report will go before cabinet with a draft policy in by March 2023	

Appendix 2 – Revocation of Croydon Suburban Design Guide Supplementary Planning Document 2

SCRUTINY RECOMMENDATION	CONCLUSIONS	DEPARTMENT AND CABINET MEMBER RESPONDING	ACCEPTED / PARTIALLY ACCEPTED / REJECTED (inc. reasons for rejection)	IDENTIFIED OFFICER	ANY FINANCIAL IMPLICATIONS	TIMETABLE FOR IMPLEMENTATION OF RECOMMENDATIONS IF ACCEPTED (i.e., Action Plan)	DATE OF SCRUTINY MEETING TO REPORT BACK
Report: Revocation of Croydon Suburban Design Guide Supplementary Planning Document 2 (SPD2) (Considered by Streets Environment & Homes Committee on 20 July 2022)							
<p>1. The Sub-Committee requested that the policy on residential extensions and alterations in national, regional and local planning framework that would be used to determine applications in the absence of SPD2 be provided to the Sub-Committee.</p>	<p>The Sub-Committee were concerned that revocation of SPD2 was being recommended to Council without the replacement supplementary planning documentation on residential extensions and alterations ready to take its place as was thought to be best plan making practice which was the process that had been followed for the South Norwood Conservation Area Appraisal and Management Plan.</p>	<p>Cllr Bains, Cabinet Member for Planning and Regeneration</p>	<p>Accepted</p>	<p>Nick Hibberd, Corporate Director of Sustainable Communities</p>	<p>The recommendation can be accommodated by the existing Spatial Planning, Growth Zone and Regeneration, and Development Management Service budgets</p>	<p>28/10/2022</p>	
<p>2. The Sub-Committee requested more information on the timescales in developing and adopting the new documentation on residential extensions and alterations be provided.</p>	<p>The Sub-Committee were advised by the Cabinet Member for Planning and Regeneration that there was a political mandate for the revocation of SPD2 but Members were of the view that the risks to residents of poor quality residential extensions and alterations in the absence of replacement guidance had not been appropriately assessed.</p>	<p>Cllr Bains, Cabinet Member for Planning and Regeneration</p>	<p>Accepted – It is a statutory requirement for the Council publish a Local Development Scheme setting out its programme for the production of key planning documents. The programme for the Residential Extensions and Alternations Supplementary Planning Document will form part of the Local Development Scheme.</p>	<p>Nick Hibberd, Corporate Director of Sustainable Communities</p>	<p>The recommendation can be accommodated by the existing Spatial Planning, Growth Zone and Regeneration Service budget.</p>	<p>31/12/2022</p>	

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SCRUTINY RECOMMENDATION	CONCLUSIONS	DEPARTMENT AND CABINET MEMBER RESPONDING	ACCEPTED / PARTIALLY ACCEPTED / REJECTED (inc. reasons for rejection)	IDENTIFIED OFFICER	ANY FINANCIAL IMPLICATIONS	TIMETABLE FOR IMPLEMENTATION OF RECOMMENDATIONS IF ACCEPTED (ie Action Plan)	DATE OF SCRUTINY MEETING TO REPORT BACK
Report: Housing Directorate Overview (Considered by Scrutiny Streets, Environment & Homes Sub-Committee on 20 July 2022)							
<p>1. The Sub-Committee felt that there needed to be a greater emphasis on private sector rental accommodation and recommended that the work undertaken by Generation Rent be reviewed by the directorate and Cabinet Member for Housing to investigate best practice.</p>	<p>The Sub-Committee felt that the Housing Directorate Overview report lacked focus on the private rental sector and felt that more could be done in this area.</p>	<p>Cllr Hale, Deputy Mayor and Cabinet Member for Homes</p>	<p>Accepted</p> <p>A Private Sector Housing Strategy Group has been established across the SCRER and Housing directorates. The Group aims to foster joint-working across the directorate in the development of policies and strategies relating to the private rented sector.</p> <p>The private rented sector will be a core focus of the upcoming Housing Strategy</p>	<p>Susmita Sen, Corporate Director of Housing</p>	<p>Not applicable</p>	<p>The work undertaken by Generation Rent will be considered by the Private Sector Housing Strategy Group ahead of the November 2022 Streets, Environment & Homes Sub-Committee.</p>	
<p>2. The Sub-Committee felt that there needed to be greater engagement and partnership working with registered social landlords to increase the numbers of residents moving from temporary and emergency accommodation into permanent housing.</p>		<p>Cllr Hale, Deputy Mayor and Cabinet Member for Homes</p>	<p>Accepted</p> <p>The Housing Directorate have obtained transformation funding to enable the recruitment of a Housing Association Liaison Officer.</p> <p>The officer will be focused on the governance of all relevant contracts and nomination agreements to maximise the properties the Council can use to move people out of emergency and temporary accommodation.</p>	<p>Susmita Sen, Corporate Director of Housing</p>	<p>£47,000 pa.</p>	<p>January 2023</p>	

SCRUTINY RECOMMENDATION	CONCLUSIONS	DEPARTMENT AND CABINET MEMBER RESPONDING	ACCEPTED / PARTIALLY ACCEPTED / REJECTED (inc. reasons for rejection)	IDENTIFIED OFFICER	ANY FINANCIAL IMPLICATIONS	TIMETABLE FOR IMPLEMENTATION OF RECOMMENDATIONS IF ACCEPTED (ie Action Plan)	DATE OF SCRUTINY MEETING TO REPORT BACK
<p>3. That greater detail on the proposed move to an early intervention and prevention model be provided to Members alongside additional information on information management.</p>	<p>The Committee were concerned about documentation and information management within the directorate and the possible risks that this created for residents at risk of homelessness.</p>	<p>Cllr Hale, Deputy Mayor and Cabinet Member for Homes</p>	<p>ACCEPT</p> <p>Detail regarding the movement of the Housing Needs service towards an early intervention and prevention model is detailed in the Housing Needs Transformation Plan which was presented to the Streets, Environment & Homes Scrutiny Sub-Committee in October 2022.</p> <p>The incoming NEC Housing system will improve the management of data across Housing Needs which will improve the customer journey of those at risk of homelessness.</p>	<p>Susmita Sen, Corporate Director of Housing</p>	<p>Not applicable</p>	<p>Detail regarding proposed move to early intervention and prevention model will be presented to the Streets, Environment & Homes Scrutiny Sub-Committee in October 2022.</p>	<p>Been to October 2022 Sub-Committee</p>

Appendix 4 - Opening the Books Review

SCRUTINY RECOMMENDATION	CONCLUSIONS	DEPARTMENT AND CABINET MEMBER RESPONDING	ACCEPTED / PARTIALLY ACCEPTED / REJECTED (inc. reasons for rejection)	IDENTIFIED OFFICER	ANY FINANCIAL IMPLICATIONS	TIMETABLE FOR IMPLEMENTATION OF RECOMMENDATIONS IF ACCEPTED (ie Action Plan)	DATE OF SCRUTINY MEETING TO REPORT BACK
Report: Opening the Books Review (Considered by Scrutiny & Overview Committee on 21 July 2022)							
<p>1. It was recommended that the project to maximise the functionality of the Fusion Oracle financial software should be treated as a priority and resourced accordingly, given the potential high level of risk in the Council budget.</p>	<p>It was noted that Council's financial software, Fusion Oracle had been successfully used at other local authorities and that there was a separate project underway to full embed the Fusion Oracle finance system across the Council. The Committee agreed that this work should be a priority, as it would be part of the bedrock for delivering robust financial monitoring systems, that could allow the identification of issues at an early stage. If the outcome from this project was less than optimal there was a significant risk that the budgeting errors of the past could be repeated.</p>	<p>Cllr Cummings, Cabinet Member for Finance</p>	<p>Partially Accepted</p> <p>Agreed in principle, but there will be cost implications from the changes envisaged and will need to be agreed and accepted as part of Spend Control panel processes.</p>	<p>Jane West, Corporate Director of Resources</p>	<p>Financial implications will become clearer once the scope of works is agreed with the Council's delivery partner.</p>	<p>Key improvements to the financial monitoring processes being discussed with the Council's delivery partner envisage a go live for April 2023</p>	
<p>2. It was recommended that the Administration engages in pre-decision scrutiny at an early stage in the budget setting process to consult on significant changes to service provision.</p>	<p>It was recognised that it was very likely some extremely difficult choices would need to be made to deliver the level of savings required by the Council. It was highlighted that Scrutiny could be used by the Administration as a resource to test any significant service changes to or the discontinuation of services.</p>	<p>Cllr Cummings, Cabinet Member for Finance</p>	<p>Accepted</p> <p>Please see the timescales for engagement</p>	<p>Jane West, Corporate Director of Resources</p>	<p>None</p>	<p>The scrutiny work programme includes:</p> <p>Budget Scrutiny - 6 December 2022</p> <p>Budget deep dive – 10 January 2023</p> <p>Final budget scrutiny session – 14 February 2023</p>	

SCRUTINY RECOMMENDATION	CONCLUSIONS	DEPARTMENT AND CABINET MEMBER RESPONDING	ACCEPTED / PARTIALLY ACCEPTED / REJECTED (inc. reasons for rejection)	IDENTIFIED OFFICER	ANY FINANCIAL IMPLICATIONS	TIMETABLE FOR IMPLEMENTATION OF RECOMMENDATIONS IF ACCEPTED (ie Action Plan)	DATE OF SCRUTINY MEETING TO REPORT BACK
<p>3. It is recommended that a robust training plan is prepared on the budget setting process for Members to ensure all have the requisite skills and knowledge to make an informed judgement on the proposed budget at the Budget Council meeting.</p>	<p>Given there had been a significant influx of new Councillors following the election in May, there was a need to provide training for all Members on the budget setting process and should include the production of a guide mapping out the process.</p>	<p>Cllr Cummings, Cabinet Member for Finance</p>	<p>Accepted</p> <p>The Local Government Association have agreed to provide Budget scrutiny training and will seek to expand to all Members</p>	<p>Jane West, Corporate Director of Resources</p>	<p>A budget already exists for Member training.</p> <p>A session for Scrutiny Members is planned as part of the Budget Scrutiny programme.</p> <p>There may be no additoinal cost to opening the session to all Members, or the LGA may fund a session.</p>	<p>November / December 2022.</p>	

For General Release

REPORT TO:	CABINET 16 NOVEMBER 2022
SUBJECT:	Mayor's Business Plan 2022-2026
LEAD OFFICER:	Katherine Kerswell, Chief Executive Gavin Handford, Director of Policy, Programmes and Performance
CABINET MEMBER:	JASON PERRY, EXECUTIVE MAYOR OF CROYDON
WARDS:	All
FINANCIAL IMPACT	
<p>As well as facing substantial local historic financial issues, the Council, like the rest of local government, is impacted by the current national and global economic challenges. Over the term of the Mayor's Business Plan, the Council will have to operate within a decreasing financial envelope as it endeavours to achieve financial and operational sustainability. This will require a reduction in council services and cost base of all council services, but those that continue will be delivered to a good standard. Any financial cost of the priorities set out in this Plan will be accommodated within the Council's existing budget for 2022/23. Where there are potential ongoing costs in later years, sources of funding for the priorities will be proposed in the future reports on the Budget 2023/24 and the Medium Term Financial Strategy to 2026 and Capital Strategy 2023/26 which are due to be presented to Cabinet and Full Council in early 2023.</p>	
FORWARD PLAN KEY DECISION REFERENCE NO.: 5622EM	

1. RECOMMENDATIONS

The Executive Mayor in Cabinet is recommended to:

- 1.1 Recommend to Council the adoption of the Mayor's Business Plan 2022-26.
- 1.2 Note that a detailed implementation plan and performance framework will be brought to a future meeting of Cabinet.
- 1.3 Note the arrangements to provide assurance of the implementation of the Plan.

2. EXECUTIVE SUMMARY

- 2.1 This report presents the Mayor's Business Plan 2022-26 for adoption. This will be the Council's core strategic document setting out its objectives and priorities

for the next four years. It reflects the Executive Mayor's manifesto pledges and priorities, as set out in a report to Cabinet in June 2022. It also includes actions to strengthen governance and management systems, achieve financial and operational sustainability and complete the transformation of the Council. The Plan sets out five outcomes for the Council to achieve, as well as the priority aims and high-level actions required to make them a reality. A detailed delivery plan and performance framework will be developed and presented at a future meeting of the Cabinet.

3. BACKGROUND

- 3.1 Two Reports in the Public Interest, published by the external auditor in October 2020 and January 2022, highlighted grave governance, operational and financial failures within the Council. Two Section 114 notices in November and December 2020 declared the Council's inability to balance its books, compelling it to seek exceptional financial support. The Council developed the Croydon Renewal Plan to support its application to secure financial support of up to £150m from the government in the form of a capitalisation direction. Significant progress has been made to implement the improvements required by the Secretary of State and the other actions contained in the Plan. However, the Council has been left with £1.6bn of debt and other historic financial challenges that are still being examined in depth by the Opening the Books review.
- 3.2 The Executive Mayor of Croydon was elected on a programme of change with a mandate to "restore pride in our borough to once again make it a great place to live, work and stay." A [report to the Executive Mayor in Cabinet in June 2022](#) summarised the commitments he made during the mayoral election campaign in May 2022 and set out the priorities for the Council over the next four years.
- 3.3 The election of the new Administration provides an opportunity to look beyond the scope of the Croydon Renewal Plan and plan for the future. The actions required to give effect to the Executive Mayor's priorities have been identified, as have the outstanding recommendations from reviews of the Council's activity and the measures required to complete the task of strengthening its governance and management systems, achieve financial and operational sustainability and transform the Council. These have been incorporated into a single plan for the Council.

4. THE MAYOR'S BUSINESS PLAN

- 4.1 The Mayor's Business Plan sets out the Executive Mayor's vision for Croydon. This Plan consists of five outcomes to be achieved by the Council over the next four years, with priority aims to deliver those outcomes, along with the high level actions required. The Plan is at Appendix 1.
- 4.2 The financial challenges revealed by the two Section 114 Notices and the two Reports in the Public Interest have reduced the resources available to the Council, which means that it will be forced to do less in future. However, it will strive to improve the responsiveness and where possible the quality of the

services it does provide. The Executive Mayor's mission is to transform the Council's way of working – balancing the budget, changing how services are run, securing maximum value for money, instilling strong governance and listening to residents' concerns. The Council will work closely with partners from the business, statutory, and voluntary sectors to bring more resources to the borough and to support and empower local communities so that together we can transform the Council and deliver services for the borough.

Outcomes

4.3 The five outcomes are:

1. The Council balances its books, listens to residents and delivers good, sustainable services.
2. Croydon is a place of opportunity for business, earning and learning.
3. Children and young people in Croydon have the chance to thrive, learn and fulfil their potential.
4. Croydon is a cleaner, safer and healthier place, a borough we're proud to call home.
5. People can lead healthier and independent lives for longer.

4.4 The first outcome spans the full range of activity across the Council. Achievement of all five of Outcome 1's priority aims is essential in order to transform the Council. It is also a prerequisite for the accomplishment of the other four outcomes in the Plan.

Supporting priorities

4.5 The priority aims that will support the realisation of the five outcomes are as follows:

OUTCOME 1: The Council balances its books, listens to residents and delivers good, sustainable services

1. Get a grip on the finances and make the Council financially sustainable.
2. Become a council which listens to, respects and works in partnership with Croydon's diverse communities and businesses.
3. Strengthen collaboration and joint working with partner organisations and the voluntary, community and faith sectors (VCFS).
4. Ensure good governance is embedded and adopt best practice.
5. Develop our workforce to deliver in a manner that respects the diversity of our communities.

OUTCOME 2: Croydon is a place of opportunity for business, earning and learning

6. Support the regeneration of Croydon's town and district centres, seeking inward investment and grants.

7. Deliver a vibrant London Borough of Culture which showcases local talent and supports Croydon's recovery.
8. Support the local economy and enable residents to upskill and access job opportunities.

OUTCOME 3: Children and young people in Croydon have the chance to thrive, learn and fulfil their potential

9. Ensure children and young people have opportunities to learn, develop and fulfil their potential.
10. Make Croydon safer for young people.
11. Work closely with health services, Police and the VCFS to keep vulnerable children and young people safe from harm.

OUTCOME 4: Croydon is a cleaner, safer and healthier place, a borough we're proud to call home

12. Make our streets and open spaces cleaner so that Croydon is a place that residents and businesses can feel proud to call home.
13. Tackle anti-social behaviour, knife crime and violence against women and girls so that Croydon feels safer.
14. Invest in council homes to drive up standards and develop a more responsive and effective housing service.
15. Ensure new homes are safe, well-designed and in keeping with the local area.
16. Lead action to reduce carbon emissions in Croydon.

OUTCOME 5: People can lead healthier and independent lives for longer

17. Work with partners and the VCFS to promote independence, health and wellbeing and keep vulnerable adults safe.
18. Work closely with health services and the VCFS to improve resident health and reduce health inequalities.
19. Foster a sense of community and civic life.

Delivery Plan and Performance Framework

- 4.6 A detailed Delivery Plan will be developed setting out the Council's actions to deliver the priorities and the outcomes that will be achieved over the Executive Mayor's term. For each action it will include the owners, milestones, resources and outcomes.
- 4.7 A set of key performance indicators (KPIs) will be developed alongside the Delivery Plan to track progress in performing the actions and achieving the outcomes and priority aims. These will be reported regularly to the Corporate Management Team, to the Executive Mayor and Cabinet and to the Scrutiny and Overview Committee and other appropriate regulatory committees of the Council.
- 4.8 The Delivery Plan and Performance Framework will be presented at a future meeting of the Cabinet.

Implementation assurance

- 4.9 The Plan will create a new set of objectives throughout the organisation that will be incorporated into themed strategies, detailed plans for each directorate and service plans. These will inform the personal objectives of every member of staff.
- 4.10 Action is planned to strengthen the organisation's systems for management of programmes and projects, as well as its internal controls and performance monitoring and management. Council staff are receiving training to ensure that they comply with the required procedures and controls. This should produce timely and accurate information that will enable management to intervene when and where necessary.
- 4.11 Themed Internal Control Boards and Directorate Management Teams will oversee the implementation of this Plan. These boards oversee operational issues and provide the Corporate Management Team with assurance that expected outputs are being developed and delivered within agreed timescales and cost and to the right standard.
- 4.12 A mid-term review will check progress in implementation of the Plan in the first two years and consider whether amendments to the Delivery Plan are required. A report on the outcome of the review will be brought to a future meeting of Cabinet.

5. CONSULTATION

- 5.1 Consultation will be conducted as appropriate as the high-level actions contained in the Mayor's Business Plan are developed into delivery and project plans.
- 5.2 The Business Plan is based on a development of the initial 'Executive Mayor of Croydon's Priorities' report which was made to Cabinet in June 2022. The Scrutiny and Overview Committee held a Scrutiny Session on the Executive Mayor's priorities on 27 June 2022 and provided recommendations, to which the Administration responded at Cabinet on 14 September.
- 5.3 As the projects mapped out in the Delivery Plan are progressed, wider engagement will be carried out where required with relevant service users, public bodies, voluntary, community, trade union and other interest groups, such as staff, with an interest in the matter. Resident engagement will inform the development of the youth safety plan, the violence against women and girls plan, and bespoke plans for each hotspot area. Additionally, the Council is planning to undertake a Residents Survey. The results of the survey will inform the development of the projects contained in the Plan to ensure the views of local people are incorporated.

6 PRE-DECISION SCRUTINY

- 6.1 On 27 June 2022 the Scrutiny and Overview Committee considered an update

from the Executive Mayor and made [recommendations](#) concerning the plans resulting from the Executive Mayor's priorities. On 21 September, the Executive Mayor in Cabinet [approved the response to the Committee's recommendations](#), agreeing to the following measures:

1. The Mayor's Business Plan will be supported by the development of a new communications and engagement strategy setting out how the Council will engage with the local community.
 2. New forums will be introduced for residents to be able to contribute to decision making and hold the political leadership to account.
 3. The Council can consider the use of different engagement techniques as part of the Healthy Neighbourhood programme as part of the engagement process, but it is necessary to follow formal statutory processes for Traffic related schemes.
 4. The proposed KPIs will be developed to align with the Mayor's Business Plan. These will be shared with the Scrutiny and Overview Committee for comment.
 5. The role of the Young Mayor will be reviewed in due course.
 6. The Administration will continue to argue for fair funding and engage with Government at all levels to make the case.
 7. The Council will review the carbon neutral action plan and set out how it will lead to reduce carbon emission in the borough.
- 6.2 The draft Delivery Plan will be presented for pre-decision scrutiny, before it is put forward for decision by the Executive Mayor in Cabinet. The Council's performance framework will be aligned with the Delivery Plan.

7. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 7.1 For 2022/23, any new expenditure will need to be contained within existing budgets. Individual proposals will be presented to Cabinet for approval setting out the source of the funding. This could include funding sources such as the Community Infrastructure Levy.
- 7.2 Where there are potential ongoing costs in later years, sources of funding for the priorities will be proposed in the future reports on the Budget 2023/24 and Medium Term Financial Strategy to 2026 and the Capital Strategy 2023/26, all of which are due to be presented to Cabinet and Full Council in early 2023. Sources of funding may include efficiency savings, re-direction of funding from lower priority services or the Community Infrastructure Levy.

Approved by: Lesley Shields, Head of Finance - Assistant Chief Executive and Resources, on behalf of the Director of Finance

8. LEGAL CONSIDERATIONS

- 8.1 The legal considerations arising from actions contained in the strategic outcomes of the Council and the Delivery Plan will be assessed once the Delivery Plan has been developed and projects come forward for decision making.

- 8.2 The Mayor's Business Plan is the formal Corporate Plan of the Council, and therefore is part of the Policy Framework under Article 4 of the Constitution. The Full Council is responsible for the adoption of the Policy Framework, and the decision-making process set out in the Budget and Policy Framework Procedure Rules must be followed

Approved by: Sandra Herbert, Head of Litigation and Corporate Law on behalf of the Director of Legal Services and Monitoring Officer

9. HUMAN RESOURCES IMPACT

- 9.1 Implementation of the Mayor's Business Plan will require a skilled, diverse, committed, and resident-focussed workforce to enable and ensure effective delivery to Croydon's residents. The delivery of the workforce cultural transformation programme and the Equalities Strategy will be key elements of enabling the workforce to support the delivery of the Executive Mayor's priorities, together with actions from a new people and cultural transformation strategy, which is currently in development.

Approved by: Dean Shoesmith, Chief People Officer

10. EQUALITIES IMPACT

- 10.1 The Council has a statutory duty to comply with the provisions set out in the Equality Act 2010. In summary, the Council must in the exercise of all its functions, "have due regard to" the need to comply with the three arms or aims of the general equality duty. These are to:
- eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Act,
 - advance equality of opportunity between people who share a protected characteristic and people who do not share it, and
 - foster good relations between people who share a protected characteristic and people who do not share it.
- 10.2 Having due regard means to consider the three aims of the Equality Duty as part of the process of decision-making. This means that decision makers must be able to evidence that they have taken into account any impact of the proposals under consideration on people who share the protected characteristics before decisions are taken.
- 10.3 The Council's equalities analysis of the Mayor's Business Plan has identified that its priorities and high-level actions aim to benefit several groups of people that share protected characteristics, with no negative impacts currently identified. They incorporate measures that will advance equality and foster good relations. The Plan includes measures to listen to and involve residents in the design and review of services. As delivery and project plans to implement these changes are developed, the limited resources available may create the potential for negative impact to these groups. However, at that stage equality analyses will be conducted of the likely effects of each project on the relevant

protected groups. Where there is evidence of an adverse impact on any of the protected groups, the Council will consider whether that policy is nevertheless justified in the light of wider aims. Even if it is justified, the Council will consider whether it should take proportionate steps to mitigate or avoid the adverse impact.

- 10.4 For the Council's services to meet the needs of local residents, and of the community at large, it is essential that its plans and policies take into account the views of local people and others who use council services. The Plan includes arrangements to ensure that residents of all ages are heard and inform service development and commissioning.
- 10.5 Improving data collection from service users across the nine protected characteristics will benefit decision making by ensuring that decisions are based on clear evidence. Directorates will also evidence customer satisfaction and dissatisfaction using this method across the protected characteristics to ensure that the Council is delivering a fair and equitable service to all protected groups.
- 10.6 Consultation and Engagement will ensure fair access for disabled residents by conforming with equality standards such as those outlined by the British Dyslexia Associations and other access measures. Due regard will also be given to ensuring access to those digitally excluded or those who do not speak English as a first language.
- 10.7 The Council will also encourage its community partners, suppliers and local business to adopt both Croydon's Equalities Pledge and the George Floyd Race Matters Pledge, the Council's standard for equality in the borough.

Approved by: Gavin Handford, Director of Policy, Programmes and Performance

11. ENVIRONMENT AND CLIMATE CHANGE IMPACT

- 11.1 The Council will lead a borough-wide partnership to secure external funding and focus efforts on driving down carbon emissions in order to implement the recommendations of the Croydon Climate Crisis Commission (which are being given effect through the [Croydon Carbon Neutral Action Plan](#) adopted in February 2022). However, any measure to reduce car use, such as further Low Traffic Neighbourhoods, must only be delivered in conjunction and partnership with local residents and businesses. The Council will not support any proposal to introduce distance-based road pricing or extend the Ultra-Low Emissions Zone to outer London.

12. CRIME AND DISORDER REDUCTION IMPACT

- 12.1 Community safety is a major priority of the Mayor. The Council will propose a review of the structure and membership of the Safer Croydon Partnership, which would oversee four delivery boards focussed on violence against women and girls, youth safety, hot spot areas and counter-terrorism. The Partnership will

review the Community Safety Strategy and develop a plan to tackle violence against women and girls. The Council will tackle anti-social behaviour (ASB), crime and violence by working with the Police, developing a strong partnership between the voluntary, business and statutory sectors in Croydon and using Public Spaces Protection Orders to crack down on ASB hot spot areas.

- 12.2 There will be a strong emphasis on prevention by tackling the underlying causes of crime. This will apply in particular to making Croydon safer for young people, working as one council with partners to develop a youth safety plan, focusing on prevention, intervention, disruption and diversion. Actions will include exploring with young people, the VCS, providers and businesses how to improve access to the youth offer in the borough, working for the provision of mentors for all who are permanently excluded from school to reduce their vulnerability to involvement with gangs and criminal activity. The Council will support schools in their work on early intervention to prevent exclusions and collaborate with them, partners and the community to secure government funding to cut youth crime.

13. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 13.1 The report presents the four-year Mayor's Business Plan for adoption. This will be a single core plan to implement the commitments of the Executive Mayor of Croydon and outstanding actions to complete the transformation of the organisation into a council that delivers its services in a financially disciplined and motivated way.

14. DATA PROTECTION IMPLICATIONS

- 14.1 **WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?**

NO

Approved by: Gavin Handford, Director of Policy, Programmes and Performance.

CONTACT OFFICER: John Montes, Senior Strategy Officer.

APPENDIX:

- 1. Mayor's Business Plan 2022-2026**

BACKGROUND PAPERS: None.

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Mayor's Business Plan 2022 - 2026



Mayor's foreword



In recent years, trust in our Council has been hit as the full extent of the financial mismanagement under the previous Administration has come to light. The two Reports in the Public Interest highlighted deep governance failures and the two Section 114 notices, effectively declaring the Council bankrupt, left it unable to balance its own books and reliant on £150m of government support to stay afloat. The process of 'Opening the Books' has further highlighted inherent weaknesses in income projections and budget setting processes.

At the same time, rather than listening to and serving the people of Croydon, the Council lost sight of its core purpose, preferring to play monopoly with council taxpayers' money, resulting in bailing out its own failing housing company whilst increasing debt to over £1.6bn. Residents deserve and expect better and over the coming years that is what I will deliver.

This Croydon Mayoral Business Plan sets a new direction, building on the hopes and aspirations of our residents and businesses. The Plan will transform the Council into one that delivers sound and sustainable local government services, and in so doing will transform our borough into one that Croydonians can once again be proud to call home.

Change will not happen overnight but, over the next four years, I will put the Council back on track by working through our five priority outcomes and seizing the opportunity to do things differently. I want to improve the quality and responsiveness of the services we continue to provide, whilst being prudent with every penny of taxpayers' money.

I fully recognise that the scale of the financial challenge facing Croydon is almost without precedent in local government. That's why balancing the books, resolving the outstanding financial threats facing the Council, and putting our finances on a stable, secure footing will be the most important task of my Administration in the coming years.

To do that, the Council will need to continue to reduce spending for years to come. That will mean extremely difficult decisions about the services we continue to provide to residents and businesses. Ultimately the Council has to spend less and, in so doing, will be able to do less.

My overarching priority must be to deliver a wholesale transformation of the Council's way of working, so that we balance the budget and change how services are run. The Council will work more closely with our partners from the business, statutory, and voluntary sectors to bring more resources to the borough and to support and empower our diverse communities as we transform the Council and the borough.

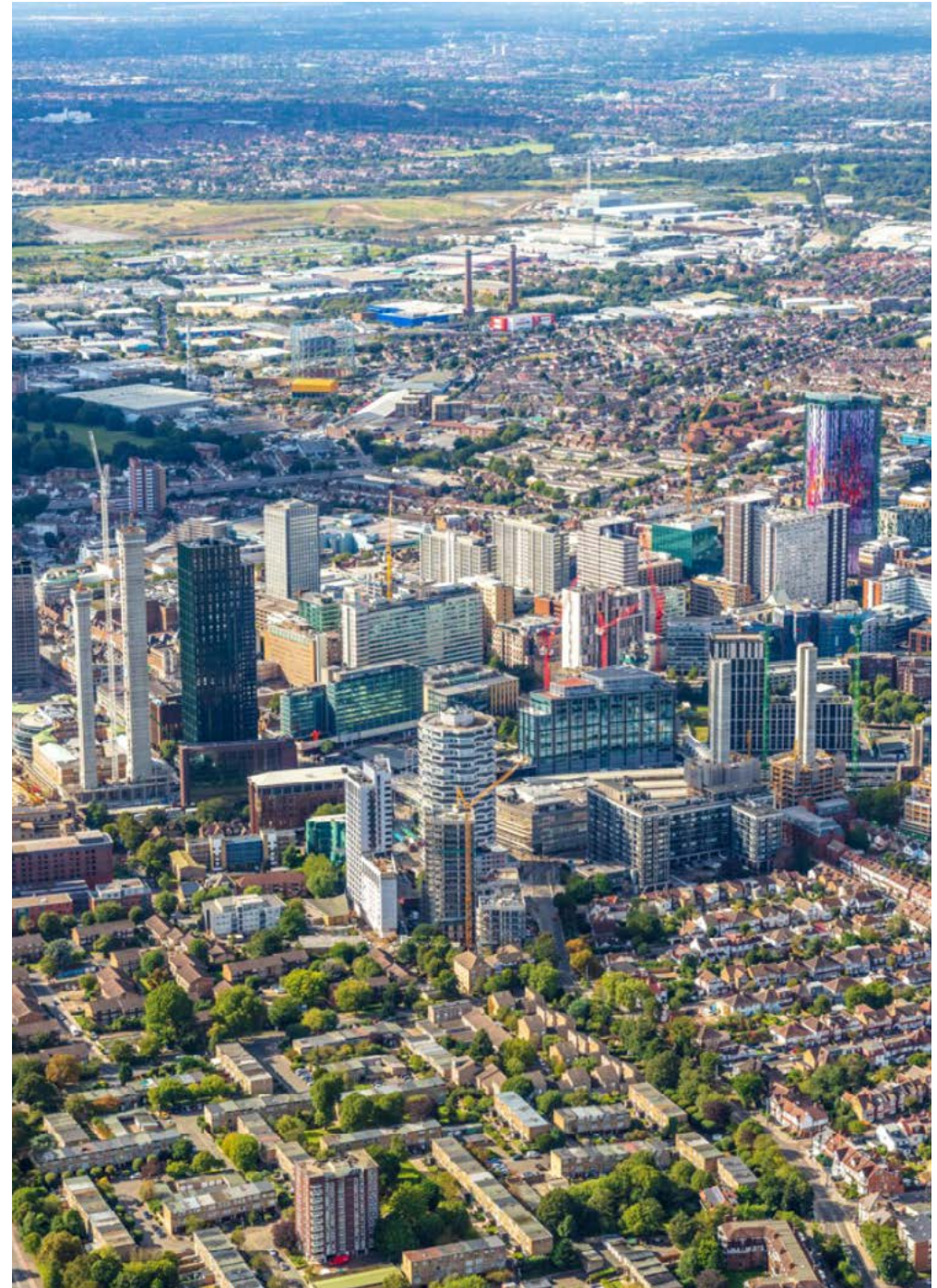
At the same time, I will instil strong governance to ensure the mistakes of the past can never happen again and that the Council is once again listening to our residents' concerns. At the heart of this agenda will be a steadfast commitment to seek maximum value for money from every penny the Council spends.

Alongside addressing our financial challenge, I will refocus the Council on residents' core priorities. We will work to make Croydon a place of opportunity for business, earning and learning; to ensure every child and young person in Croydon has the chance to thrive, learn and fulfil their potential; to make Croydon a cleaner, safer and healthier place; and to support our residents to live independently while ensuring the most vulnerable people are safe. Together with our communities and partners, we will restore pride in our borough.

While some of these priorities will require new funding, much can be achieved by getting better value from the money we already spend; making good use of technology; working more closely with our partners like the Police, the NHS and local community organisations; and ensuring the Council listens to and empowers residents to do more for themselves. I will not be able to do everything our community wants, and, in many instances, the Council will have to do less until we have managed to stabilise our finances This isn't just about balancing the books. I am committed to creating a sustainable Council to support residents over the longer term.

Croydon Council has been in crisis for too long. Whilst I do not underestimate the scale of the challenge, I am confident we can and will change the Council for the better. This Business Plan sets out a positive but realistic vision of where we will be in four-years' time. A council which balances its budget, which listens to and works with residents and business, and which focuses its available resources on protecting vulnerable people and delivering core services well.

Jason Perry, Executive Mayor of Croydon



Outcomes and supporting priorities

1. The council balances its books, listens to residents and delivers good sustainable services

- Get a grip on the finances and make the Council financially sustainable.
- Become a council which listens to, respects and works in partnership with Croydon’s diverse communities and businesses.
- Strengthen collaboration and joint working with partner organisations and the voluntary, community and faith sectors.
- Ensure good governance is embedded and adopt best practice.
- Develop our workforce to deliver in a manner that respects the diversity of our communities.



By transforming the Council, we will be better placed to achieve these outcomes:



2. Croydon is a place of opportunity for business, earning and learning

- Support the regeneration of Croydon’s town and district centres, seeking inward investment and grants.
- Deliver a vibrant London Borough of Culture which showcases local talent and supports Croydon’s recovery.
- Support the local economy and enable residents to upskill and access job opportunities.

3. Children and young people in Croydon have the chance to thrive, learn and fulfil their potential

- Ensure children and young people have opportunities to learn, develop and fulfil their potential.
- Make Croydon safer for young people.
- Work closely with health services, Police and the VCFS to keep vulnerable children and young people safe from harm.

4. Croydon is a cleaner, safer and healthier place, a borough we’re proud to call home

- Make our streets and open spaces cleaner so Croydon is a place that residents and businesses can feel proud to call home.
- Tackle anti-social behaviour, knife crime and violence against women and girls so that Croydon feels safer.
- Invest in council homes to drive up standards and develop a more responsive and effective housing service.
- Ensure new homes are safe, well-designed and in keeping with the local area.
- Lead action to reduce carbon emissions in Croydon.

5. People can lead healthier and independent lives for longer

- Work with partners and the VCFS to promote independence, health and wellbeing and keep vulnerable adults safe.
- Work closely with health services and the VCFS to improve resident health and reduce health inequalities.
- Foster a sense of community and civic life.

Croydon at a glance

Population¹

Largest population in London (390,800), based on 2021 Census

- Most 0-19s in London (97,925)
- Most 20-64s in London (239,761)
- 3rd most over-65s out of 32 London boroughs (53,114)
- Projected growth 2022 - 2041, 7.9%²

Croydon's businesses

Home to **14,990** enterprises - 13th highest out of 32 London boroughs (2022).³



13,885 Micro
(0-9 employees)



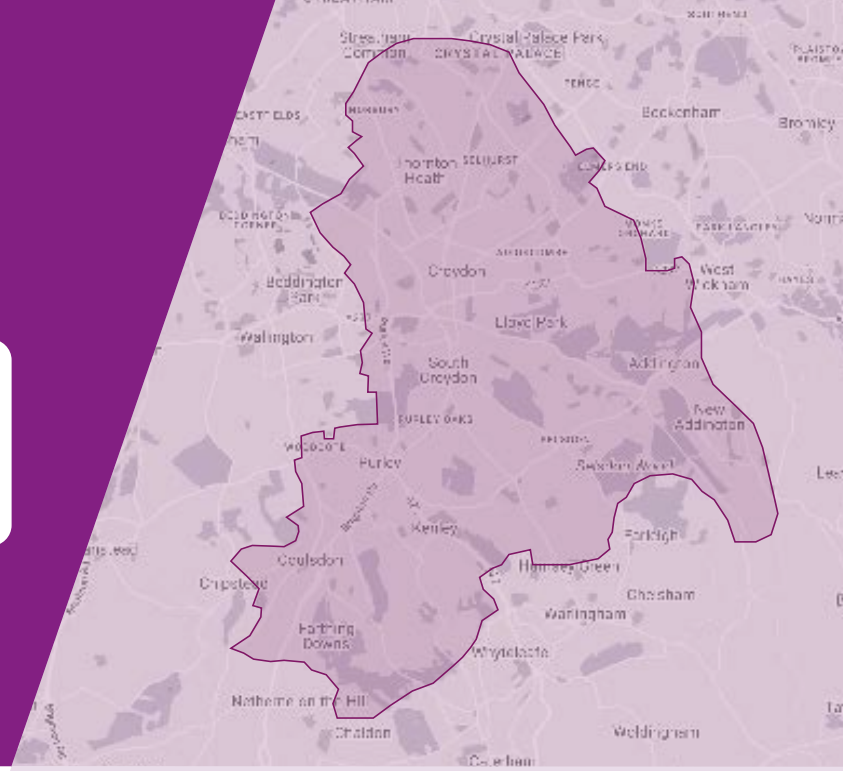
910 Small
(10-49 employees)



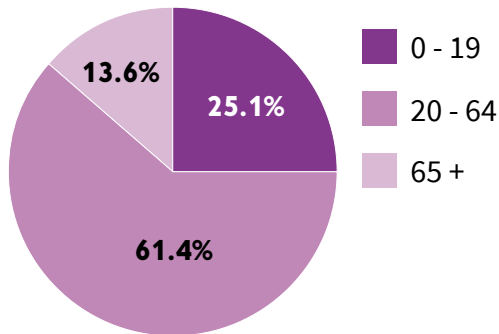
160 Medium
(50 to 249 employees)



35 Large
(over 250 employees)



Age in years (2021 Census)



Population change by age group in Croydon 2011-2021:

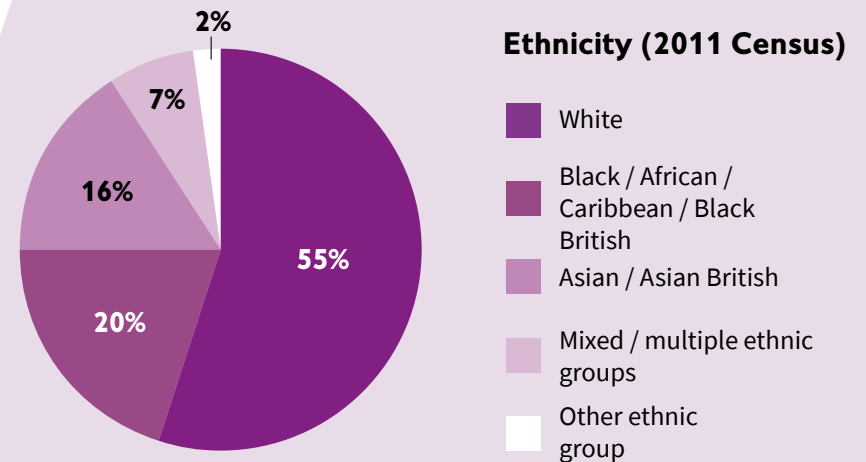
- Children aged 0-15 years increased by 1.5%
- People aged 16-64 years increased by 7.3%
- People aged 65 and over increased by 19.6%

Croydon's green space⁴



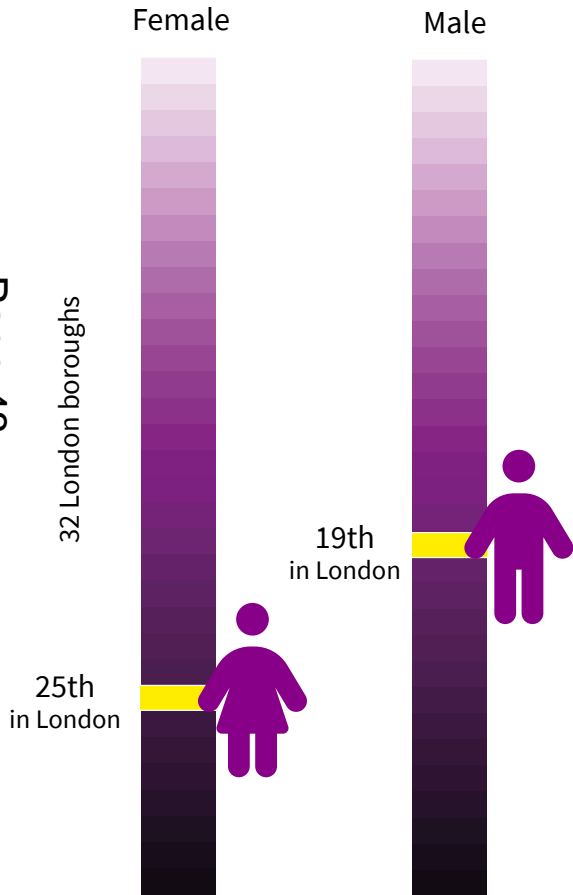
Diversity⁵

One of London's most diverse boroughs (2011 Census)



Challenges

London life expectancy at birth (2018-2020)



Gap in life expectancy at birth between most deprived and least deprived ward of the borough (2016-20)



Health Inequalities ⁶

Education ⁷



Early Years Foundation Stage

74.6% achieved a good level of development. London average 74.1%, national average 71.8% (2018/19)



Key Stage 2 60% of pupils reached the expected standard in reading, writing and maths. London average 65%; national average 58% (2021/22)

Key Stage 2 8% of pupils reached a higher standard in reading, writing and maths. London average 11%; national average 7% (2021/22)

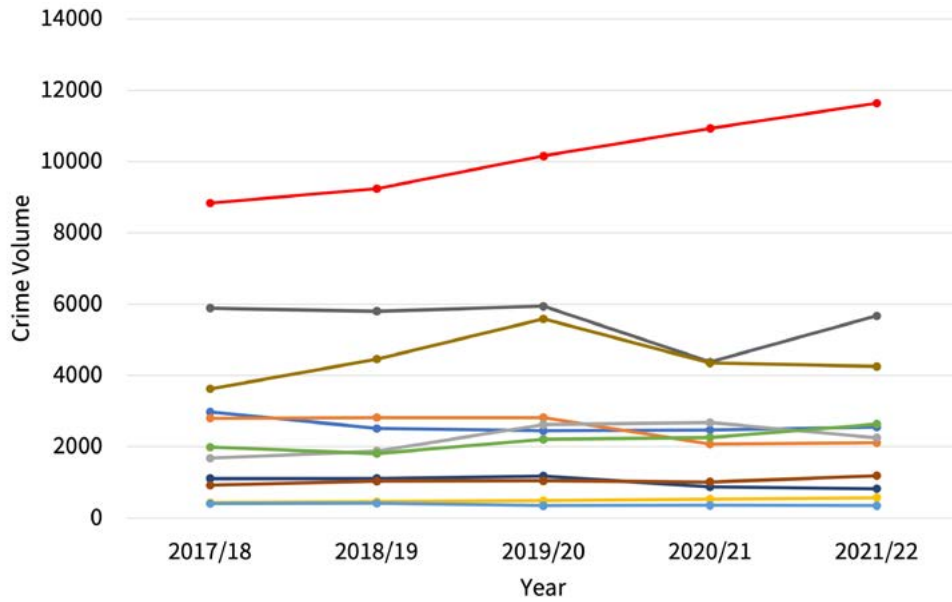


Key Stage 4 47.4 average Attainment 8 score per pupil. London average 52.6, national average 48.8 (2021/22)

Key Stage 4 48.7% of pupils achieved grades 9-5 in English and maths. London average 57.3%, national average 48.8% (2021/22)



Volume of crime in Croydon by type in the last five years



- Arson and Criminal Damage
- Drugs
- Possession of Weapons
- Robbery
- Theft
- Violence Against the Person
- Burglary
- Misc. Crime Against Society
- Public Order
- Sexual Offences
- Vehicle Offences



40,437 offences in Croydon in the rolling 12 months to September 2022, 15th highest rate in London (out of 32). This is 103.6 per 1,000 population.

Children's and Adults' Social Care



2nd Highest

Rate of **children looked after** within the 32 London authorities (March 2021)⁹

March 2021

683 children of which 211 were unaccompanied asylum seekers

July 2022

538 children of which 95 were unaccompanied asylum seekers



4th Highest

A rate of 970 per 100,000 18-64 year olds accessing long term support from **Adult Social Care** "at one point in the year" out of 31 London authorities. (2021/22)¹⁰

2021/22

2,325 18-64 year olds

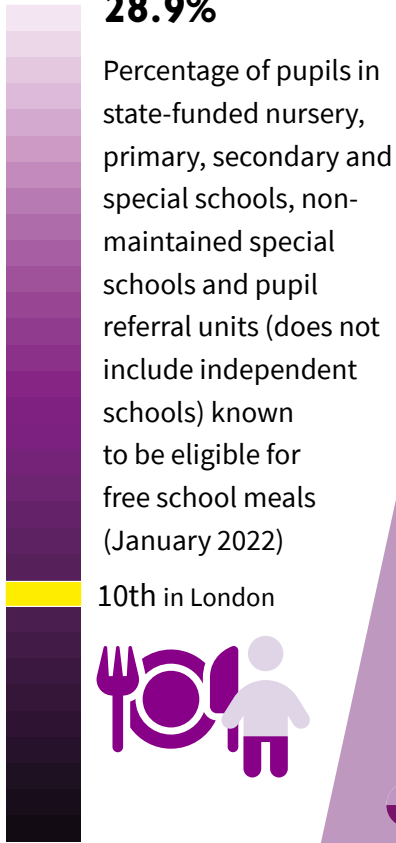
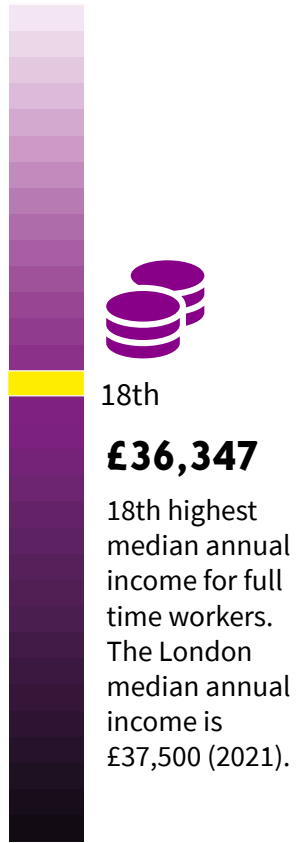


14th Highest

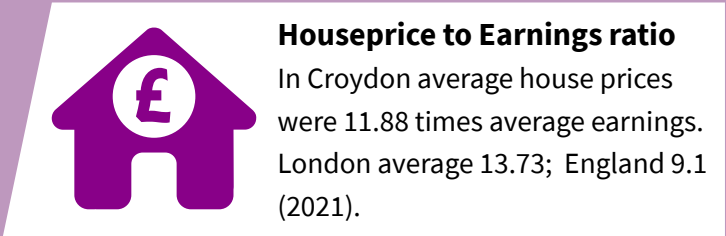
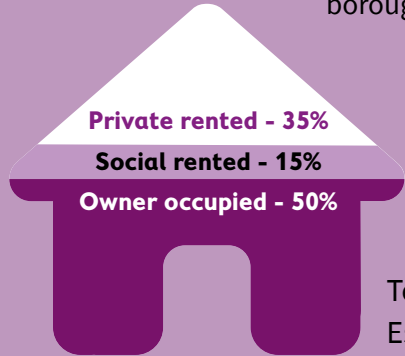
A rate of 6,665 per 100,000 65+ year olds accessing long term support from **Adult Social Care** "at one point in the year" out of 31 London authorities. (2021/22)¹⁰

2021/22

3,600 65+ year olds



13,393 council homes, 12th most out of 33 London boroughs (2021)



Outcome 1: The Council balances its books, listens to residents and delivers good sustainable services

Outcome 1 spans the activity of the whole Council and focuses on transforming the organisation into one that delivers sound, sustainable local government services. Owing to the Council's financial situation, we have fewer resources to spend on services for residents. Some services will have to stop; others will be targeted at people with the most need. In some cases, we will work with the community to help themselves and then help residents find the help they need. We must achieve all five of the priority aims below to transform the Council. Unless we do so, we will not be able to accomplish the other four outcomes in this plan.

1. Priority: Get a grip on the finances and make the Council financially sustainable

With the Council still reliant on Government support to stay afloat, getting a grip on the finances is a top priority. This will mean difficult but necessary decisions to make the Council financially sustainable for the future. We will instil financial discipline, make services more efficient and seek to get value for money from every penny of taxpayers' money we spend.

To do this we will:

- Deliver the savings in the Medium Term Financial Strategy and increase our income.
- Reduce council debt by selling or letting more council assets and repaying capital loans.
- Strengthen financial management systems, budget setting, controls and monitoring.
- Ensure all staff comply with finance and human resources procedures, controls and regulations.
- Deliver projects within budget, with governance controls on spending.

- Review the Housing Revenue Account to plan investment in council housing stock.
- Introduce robust contract management to ensure efficient, value for money services.
- Redesign services to improve efficiency and enhance residents' experience.
- Explore shared delivery of services where this could achieve economies of scale.



2. Priority: Become a council which listens to, respects and works in partnership with Croydon's diverse communities and businesses

For too long the Council has been an organisation which 'does to' residents rather than work with them. We will work to increase opportunities for residents to get involved in decisions and improvements that affect their lives and put local voices at the heart of the Council's work. We will ensure that all residents are treated fairly, with respect and dignity.

To do this we will:

- Hold regular Croydon Mayor's Question Time events around the borough.
- Actively listen to and take account of resident feedback.
- Develop new ways for residents and partner organisations to have their say on council decisions.
- Ensure the voices of children, young people and their families are heard and inform service development and commissioning.
- Improve customer service standards with a Croydon Customer Charter.
- Work with council tenants and leaseholders to deliver the Residents Charter.
- Make it easier to contact the Council and install a new, reliable telephone system.
- Improve responses to Mayor/Member enquiries, complaints and information requests.



3. Priority: Strengthen collaboration and joint working with partner organisations and the voluntary, community and faith sectors

To become financially sustainable the Council will have to deliver essential services within a smaller budget. It will not be able to meet residents' needs on its own. In some cases, others will have to take the lead in future, with the Council stepping back to adopt a supporting, partnership role. To achieve the outcomes Croydon needs, we must join efforts with all partners from the business, statutory, and voluntary sectors to bring more resources to the borough and to support and empower our communities to help themselves. The voluntary, community and faith sectors (VCFS) have an excellent track record of identifying local issues and reaching out to the most vulnerable in our communities. With its partners in the statutory and business sectors, the Council will build support for community and faith groups that play this vital role.

We will:

- Create closer relationships and joint working between the Council and our partners through revitalised partnerships.
- Work with our partners to support bids and bring new funding to the borough.
- Empower local VCFS organisations to bid for council contracts and opportunities.
- Transfer council-owned buildings to management by VCFS organisations where appropriate.
- Work with the health sector to provide coordinated support and funding for the VCFS.

4. Priority: Ensure good governance is embedded and adopt best practice

The Council must learn the lessons of past failures and embed sound governance processes to ensure that decision-making is transparent, open and honest. These must ensure effective control of our projects and programmes and encourage meaningful scrutiny and challenge.

To do this we will:

- Complete full implementation of recommendations in both Reports in the Public Interest.
- Introduce internal control boards to ensure good governance and project delivery to time and within budget.
- Ensure capital projects have clear outcomes and agreed budgets that are delivered.
- Train and enable staff and elected Members to perform their governance roles effectively.
- Publish a Forward Plan of the key council decisions to be made.
- Build staff understanding of and confidence in using the Council's whistle blowing policy.



5. Priority: Develop our workforce to deliver in a manner that respects the diversity of our communities

We have not always lived by our values. The Council needs to change how it works, actively put residents first and regain their trust. We need to strengthen leadership and management, develop behaviours aligned with the Council's values, improve staff skills, and create a psychologically safe and inclusive environment for all staff. We will support, develop and value our staff to ensure the Council is accessible and visible to our diverse communities and that it delivers the proactive and respectful services they expect and deserve.

To do this we will deliver a new People and Cultural Transformation Strategy to:

- Strengthen our leadership and management capabilities.
- Build an equal, diverse and inclusive workplace.
- Prioritise the health, wellbeing and resilience of our staff, where staff can thrive and are engaged and motivated to deliver positive outcomes for our diverse communities.
- Build our skills and capabilities and optimise our performance.
- Acquire and retain talent, responding to skills gaps in the context of a more competitive recruitment market.
- Establish a market leading reward package for staff.
- Develop an employer brand to attract employees who share the Council's values.

Outcome 2: Croydon is a place of opportunity for business, earning and learning

1. Priority: Support the regeneration of Croydon's town and district centres, seeking inward investment and grants

The Council will work with businesses and residents to develop a new, sustainable plan to regenerate Croydon town centre that responds to changes in the retail and leisure industry. Together we will develop collaborative strategies, seek inward investment and apply for grants to revive our high streets and district hubs, and unleash Croydon's economic potential.

2. Priority: Deliver a vibrant London Borough of Culture which showcases local talent and supports Croydon's recovery

Being awarded the status of Borough of Culture 2023 brings funding for a programme that will put the spotlight on Croydon's amazing cultural, arts and music offer. The celebration will showcase a diverse range of local artists, cultural organisations and venues and will see Fairfield Halls once again playing a key role in local cultural life.



With our partners we will:

- Develop and deliver a clear shared vision with businesses, developers and residents to steer our town centre and high street recovery.
- Launch an exciting inward investment campaign for Croydon to attract new businesses and jobs in growth sectors.
- Work with and encourage more business associations or Business Improvement Districts (BIDs) to bring businesses together and foster recovery in district centres.
- Reopen Purley Pool and Leisure Centre at the heart of Purley town centre.

We will work with our partners to:

- Deliver the Borough of Culture programme of Flagship Events across the borough that puts Croydon on the map.
- Set up an Ignite Fund to empower local artists and cultural enterprises to get involved.
- Offer an attractive annual programme of cultural and community events.
- Work with partners to re-establish Fairfield Halls as one of the premier cultural venues in South London.
- Attract inward investment in culture, creating a legacy.

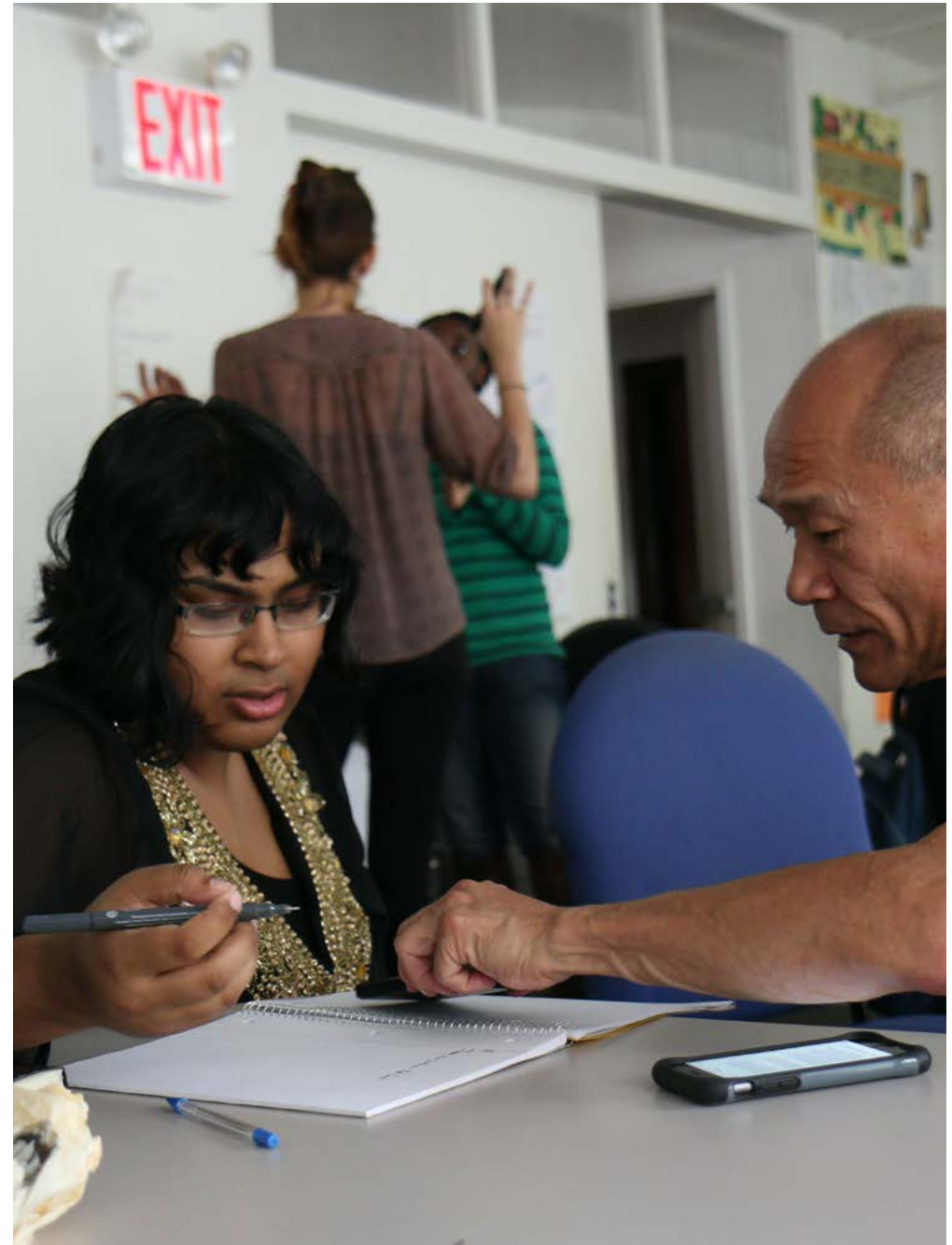


3. Priority: Support the local economy and enable residents to upskill and access job opportunities

We will convene partners, developers, investors and Croydon's diverse communities to create economic opportunity for all and enable residents to develop the skills needed to access it.

To do this, we will:

- Use the Council's spending power to buy and employ locally, offer local providers the opportunity to join our supply chains and encourage anchor organisations to do likewise whilst still ensuring value for money.
- Pay the London Living Wage, encouraging our suppliers and other employers to do so.
- Work with training providers and businesses to equip and enable residents to fill jobs in growth sectors and move up career paths.
- Use the social value element of our contracts to ensure that suppliers use local resources such as Croydon Works, Croydon College, London South Bank University and Croydon Commitment.



Outcome 3: Children and young people in Croydon have the chance to thrive, learn and fulfil their potential

1. Priority: Ensure children and young people have opportunities to learn, develop and fulfil their potential

Croydon is a young borough, with the largest population of under-18s in London. We want to celebrate their talents and achievements and work with partners to enable our children and young people, including those with special educational needs and disabilities, to fulfil their potential.

We will:

- Enable more pupils with special educational needs and disabilities to attend and thrive in Croydon schools.
- Develop an effective Education Partnership with schools.
- Work with schools to improve support for vulnerable pupils and to continue to reduce exclusions.
- Explore with young people, the VCFS, providers and businesses how we can improve access to youth services in Croydon.
- Develop and deliver an Early Years Strategy to ensure every child is given the best start in life.
- Work with all education providers to improve attendance, inclusion and standards for all, so that more of our children and young people can fulfil their potential.
- Celebrate the talents of our young people by supporting initiatives such as 'Croydon has talent'.



2. Priority: Make Croydon safer for young people

Making the borough safer for our young people is a top priority. In the year to July 2022, serious youth violence in Croydon rose by almost a quarter compared to the previous 12 months. We will work as one Council to strengthen partnerships with the voluntary, business and statutory sectors and schools in Croydon to tackle the root causes of youth crime, protect those at risk of offending and embed a strong joint approach to prevent youth violence and help our young people to be, and feel, safe.



We will:

- As one council, develop and deliver a youth safety plan with our partners that leads to a reduction in serious youth violence and exploitation and keeps young people safe, seeking government funding to cut youth crime.
- Reduce the severity of the impact of gang activity and exploitation on children and young people in Croydon.
- Work with partners to provide mentors for young people in care or excluded from school.
- Develop and implement the Holiday Activities and Food programme to fund school holiday activities and nutritious food for as many young people eligible for free school meals as possible.

3. Priority: Work closely with health services, Police and the VCFS to keep vulnerable children and young people safe from harm

The Council will work with partners including schools to help families earlier when problems arise. We will support families to stay together where it is safe to do so by providing targeted holistic and integrated support. Where statutory services are needed, these will be of good quality and provide value for money. We will fulfil our responsibilities as a corporate parent to ensure children and young people who need to be in our care, and those leaving our care, have the best start in life.

We will:

- Transform and redesign services such as early help and family hubs so families can access the right support in the right place at the right time, reducing the need for statutory support and intervention.
- Review the Croydon Safeguarding Children Partnership to embed the commitment to safeguard children and young people by all partners.
- Implement a programme of continuous improvement to sustain the quality of services relating to children, young people and education.
- Implement inspection recommendations and benchmark services, bringing spending on social care for children down to the average for similar London councils by 2023/24.



Outcome 4: Croydon is a cleaner, safer and healthier place, a borough we're proud to call home

1. Priority: Make our streets and open spaces cleaner so that Croydon is a place that residents and businesses can feel proud to call home

Residents expect and deserve to feel proud of our borough as they walk down the street. That means working with them and partners to look after our streets, parks and open spaces, and crack down on the graffiti and litter which blight our communities.



We will:

- Review the street cleaning and refuse collection contract.
- Work with partners and Street Champions on a targeted area-based approach to cleaning up our district centres.
- Reintroduce a graffiti removal service.
- Seek funding to improve the public realm of our town centre and district centres, including replacing underpasses with surface level crossings.
- Strengthen our relationship with 'Friends' Groups, giving them a stronger voice and supporting their initiatives.

2. Priority: Tackle anti-social behaviour, knife crime and violence against women and girls so that Croydon feels safer

Ensuring our borough is and feels like a safe place to live is a top priority. We will strengthen partnerships between the voluntary, business and statutory sectors in Croydon to share intelligence and coordinate action. The Safer Croydon Partnership will be restructured, with six delivery boards focussed on violence against women and girls, youth safety, hot spot areas, counter-terrorism, substance misuse and community engagement. We will support the Police to tackle crime and violence in our borough. We recognise what 'Friends' Groups can do to tackle low level anti-social behaviour (ASB) and will work with residents and partners to crack down on ASB hot spots.

We will:

- Strengthen the role that the Safer Croydon Partnership takes to tackle crime and violence, supported by a substance misuse board to deliver on the Government's 10-year programme.
- Review the Community Safety Strategy to focus it on three delivery priorities: violence against women and girls, youth safety and hot spot areas.
- Crack down on ASB hot spots by working with the Police to introduce Public Space Protection Orders (PSPOs) and other appropriate measures.
- Develop and deliver a plan to tackle violence against women and girls by building on our work to tackle domestic abuse, responding to the voices of victims and survivors, and working to stop the perpetrators of violence.

3. Priority: Invest in council homes to drive up standards and develop a more responsive and effective housing service

Council tenants and leaseholders expect warm, safe and dry homes, well-maintained by their landlord, but too often the Council has fallen well short of this basic standard. We will transform the housing service to invest in and improve standards in council homes and to put residents at the heart of decisions about the housing service. A renewed focus on tenants will ensure they are treated with respect and their issues and complaints are responded to promptly and effectively.

We will:

- Work with tenants to transform the Housing Directorate into an effective and responsive service as set out in a revised Housing Improvement Plan.
- Introduce a new, effective and responsive housing repairs service.
- Develop an asset management strategy to invest in our council homes, modernise and bring them up to a standard fit for the 21st century.
- Invest in and provide affordable homes.
- Prevent homelessness by providing advice, guidance and appropriate support.
- Review procurement of temporary accommodation for homeless people to obtain value for money.

4. Priority: Ensure new homes are safe, well-designed and in keeping with the local area

New development will be design-led, not density-led. While we must continue to plan for new homes, schemes must respect the views of local people, enhance the character of our places, and recognise the need for amenity space.

We will:

- Review Croydon's Local Plan to remove intensification zones, support sustainable development and emphasise design and character over density.
- Revoke the SPD2 Suburban Design Guide.
- Review conservation areas to ensure the borough's special places are protected for generations to come.
- Review the planning and enforcement service to identify the resources needed to improve the service for customers.
- Enforce policies to tackle the cumulative impact of houses in multiple occupation.
- Review the building control service to ensure it can fulfil current statutory duties and new obligations relating to building safety.



5. Priority: Lead action to reduce carbon emissions in Croydon

Tackling the Climate Emergency is vital, but it is not something we can do alone. The Council will lead a borough-wide partnership to secure external funding and focus efforts on driving down carbon emissions.

We will work with partners across the borough to:

- Embed climate adaptation and carbon reduction in the strategies of the Council and its key partners.
- Drive a green economic recovery, developing skills and local retrofit capacity.
- Develop a pipeline of retrofit projects and promote public transport and active travel.
- Encourage people, businesses and partners to take action to reduce carbon emissions and tackle the climate emergency.
- Lobby government and the GLA for regulation and funding to scale up action.



Outcome 5: People can lead healthier and independent lives for longer

1. Priority: Work with partners and the VCFS to promote independence, health and wellbeing and keep vulnerable adults safe

We will harness all the skills and experience available to improve health and wellbeing in the borough, enable people to live independently for as long as possible, and keep adults who are at risk of abuse and neglect safe. We will work with partner organisations, including Health, the private sector and voluntary organisations to put residents at the heart of policy making, commissioning and service design.

We will:

- Work with partners through the new Adult Social Care and Health Improvement Board to develop a sustainable model of adult social care for the future.
- Involve residents through a strengths-based approach to practice and commissioning, and co-design our future engagement model with people with lived experience.
- Maximise prevention, early intervention and independence, and manage demand for statutory services, by developing our reablement, direct payments, and care technology offers.
- Commission cost-effective services and continue to work with providers to support and develop the market to meet local need in innovative ways.
- Work with partners and stakeholders to recognise and support carers.
- Support and progress health and care integration where this benefits residents.
- Collaborate with partners to make Croydon a dementia friendly borough.
- Support the development of homes that promote independence.



2. Priority: Work closely with health services and the VCFS to improve resident health and reduce health inequalities

Following the pandemic tackling inequality and improving the health of our residents is more important than ever. We will build on our already close partnership with the local NHS to improve public and mental health, reduce inequalities and provide targeted support for those with long-term conditions.

We will:

- Work with individuals, communities and the NHS to promote and increase life expectancy.
- Reduce inequalities in provision for our diverse communities across the borough.
- Advocate and lobby for proportionate NHS funding to reflect the health inequalities within Croydon.
- Target health checks with the aim of reducing the impact of long-term health conditions.
- Work with the NHS to provide an effective vaccination programme for Covid and flu and advocate for immunisation for all communicable diseases where scheduled vaccination provides protection.
- Develop an updated multi-agency harm reduction and suicide prevention strategy.

3. Priority: Foster a sense of community and civic life

Croydon's sense of community spirit is one of our greatest strengths. We will increase pride in Croydon and continue to foster a vibrant and active civic life, celebrating the contribution of different communities and creating opportunities for people to come together and share their experiences and histories.

We will:

- Foster good community relations.
- Facilitate community action and celebrate residents' contributions.
- Speak up for Croydon and celebrate the borough's sense of place and its traditions and history.



Ensuring delivery of the plan

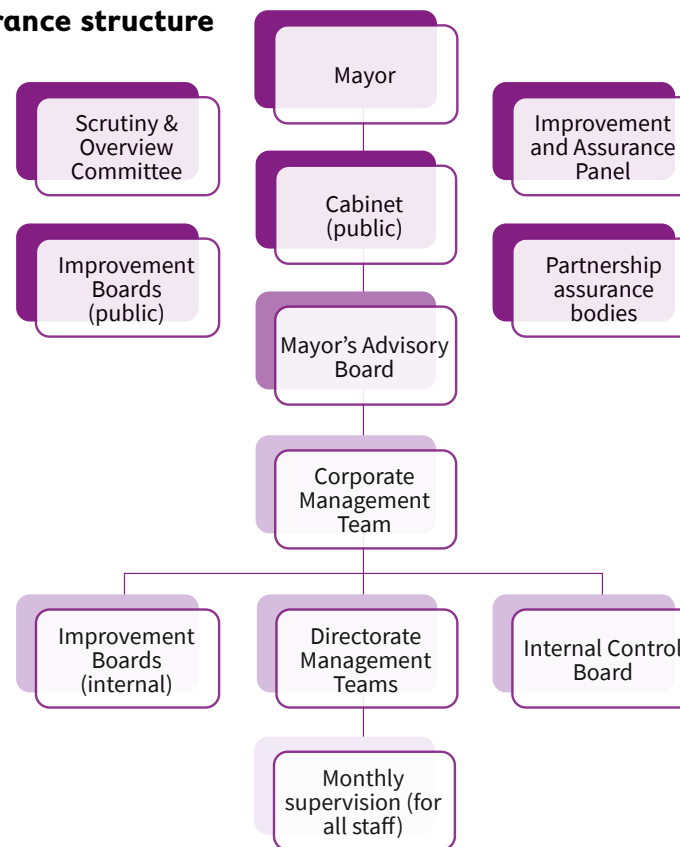
The Mayor's Business Plan will create a new set of objectives throughout the organisation and be developed into themed strategies, detailed plans for each directorate and the service plans. These will inform the personal objectives of every member of staff. The Plan includes action to strengthen the Council's management systems of programmes and projects, as well as internal controls and performance management and monitoring. All council staff are receiving training to ensure that they comply with the required procedures and controls. This should produce timely and accurate information that will enable management to intervene when and where necessary.

We will ensure the implementation of this Plan through themed Internal Control Boards. These take operational decisions and provide the Corporate Management Team (CMT) with assurance that expected outputs are developed and delivered within agreed timescales and cost and to the right standard. A set of key performance indicators (KPIs) will track progress in delivery of the actions in the plan and achieving our outcomes and priority aims. These will be reported regularly to CMT, the Mayor in Cabinet, the Scrutiny Committee and other appropriate regulatory committees of the Council. They will also be viewed by the Government appointed Improvement and Assurance Panel that reports to the Secretary of State for Levelling Up, Housing and Communities.

Chain of objectives



Assurance structure



References

1. Population: Source - Office of National Statistics (ONS), 2021 Census. See www.croydonobservatory.org.
2. Projected growth 2022-41: Source - GLA 2020 based housing led projections.
3. Croydon's businesses: Source - ONS UK business counts 2022.
4. Croydon's green space: Source - Croydon.gov.uk Locally Listed Historic Parks and Gardens.
5. Diversity: Source – ONS, 2011 Census (Census data not available at time of publication. See www.croydonobservatory.org).
6. Health Inequalities: Source: Office of Health Inequality and Disparities (OHID) Fingertips Public Health data.
7. Education: Source - Department for Education statistics. Early Years Foundation Stage Profile 2021/22 results not available at time of publication.
8. Crime: Source - Metropolitan Police Service Crime Dashboard September 2022.
9. Rate of children looked after: Source - Department for Education Statistics: looked-after children.
10. Adults Social Care: Source - NHS Digital Adult social care activity and finance report 2021-22.
11. Economy: Sources - ONS Annual survey of hours and earnings, 2021; Ministry of Housing, Communities and Local Government 2019, English indices of deprivation 2019 (LSOA - lower super output area); ONS Claimant Count September 2022; Department for Education statistics on school pupils and their characteristics (free school meals); croydon.simplyconnect.uk (foodbanks); ONS Business Register and Employment Survey (employee jobs).
12. Housing: Sources – ONS Census 2021 (households); ONS Local authority housing statistics data returns 2020-21 (council homes); [Metastreet Survey \(2019\)](#) (Census 2021 data on tenure not available at time of publication); ONS Housing affordability in England and Wales (2021).

1. Introduction

1.1 Purpose of Equality Analysis

The council has an important role in creating a fair society through the services we provide, the people we employ and the money we spend. Equality is integral to everything the council does. We are committed to making Croydon a stronger, fairer borough where no community or individual is held back.

Undertaking an Equality Analysis helps to determine whether a proposed change will have a positive, negative, or no impact on groups that share a protected characteristic. Conclusions drawn from Equality Analyses helps us to better understand the needs of all our communities, enable us to target services and budgets more effectively and also helps us to comply with the Equality Act 2010.

An equality analysis must be completed as early as possible during the planning stages of any proposed change to ensure information gained from the process is incorporated in any decisions made.

In practice, the term '**proposed change**' broadly covers the following:-

- Policies, strategies and plans;
- Projects and programmes;
- Commissioning (including re-commissioning and de-commissioning);
- Service review;
- Budget allocation/analysis;
- Staff restructures (including outsourcing);
- Business transformation programmes;
- Organisational change programmes;
- Processes (for example thresholds, eligibility, entitlements, and access criteria).

2. Proposed change

Directorate	Resources
Title of proposed change	Mayor's Business Plan 2022-2026
Name of Officer carrying out Equality Analysis	John Montes

2.1 Purpose of proposed change (see 1.1 above for examples of proposed changes)

Briefly summarise the proposed change and why it is being considered. Please also state if it is an amendment to an existing arrangement or a new proposal

The Mayor's Business Plan 2022-2026 will be the Council's core strategic document setting out its objectives and priorities for the next four years. It reflects the Executive Mayor's manifesto pledges and priorities, and the transformation priorities of the Council. The Plan sets out five outcomes for the Council to achieve, as well as the priority aims and high-level actions required to make them a reality. A detailed four-year delivery plan and performance framework will be developed and presented at a future meeting of the Cabinet. The outcomes and priority aims are as follows:

OUTCOME 1: The Council balances its books, listens to residents and delivers good services

1. Get a grip on the finances and make the Council financially sustainable.
2. Become a council which listens to, respects and works with Croydon's diverse communities.
3. Strengthen collaboration and joint working with partner organisations and the voluntary, community and faith sectors (VCFS).
4. Ensure good governance is embedded and adopt best practice.
5. Develop our workforce to deliver in a manner that respects the diversity of our communities.

OUTCOME 2: Croydon is a place of opportunity for business, earning and learning

6. Regenerate Croydon's town and district centres, seeking inward investment and grants.
7. Deliver a vibrant London Borough of Culture which showcases local talent and supports Croydon's recovery.
8. Support the local economy and enable residents to upskill and access job opportunities.

OUTCOME 3: Every child and young person in Croydon has the chance to thrive, learn and fulfil their potential

9. Ensure every child and young person has opportunities to learn, develop and fulfil their potential.
10. Make Croydon safer for young people.
11. Keep vulnerable children and young people safe from harm.

OUTCOME 4: Croydon is a cleaner, safer and healthier place, a borough to be proud of

12. Clean up our streets and open spaces so that Croydon is a place residents can feel proud of.
13. Tackle anti-social behaviour, knife crime and violence against women and girls so that Croydon feels safer.
14. Invest in council homes to drive up standards and develop a responsive and effective housing service.
15. Ensure new homes are safe, well-designed and in keeping with the local area.
16. Lead action to reduce carbon emissions in Croydon.

OUTCOME 5: People can lead healthier and independent lives for longer

17. Work with partners and the VCFS to promote independence, health and wellbeing and keep vulnerable adults safe.
18. Work closely with health services and the VCFS to improve resident health and reduce health inequalities.
19. Build a sense of community and civic life.

3. Impact of the proposed change

Important Note: It is necessary to determine how each of the protected groups could be impacted by the proposed change. If there is insufficient information or evidence to reach a decision you will need to gather appropriate quantitative and qualitative information from a range of sources e.g. Croydon Observatory a useful source of information such as Borough Strategies and Plans, Borough and Ward Profiles, Joint Strategic Health Needs Assessments <http://www.croydonobservatory.org/> Other sources include performance monitoring reports, complaints, survey data, audit reports, inspection reports, national research and feedback gained through engagement with service users, voluntary and community organisations and contractors.

3.1 Additional information needed to determine impact of proposed change

Table 1 – Additional information needed to determine impact of proposed change

If you need to undertake further research and data gathering to help determine the likely impact of the proposed change, outline the information needed in this table.		
Additional information needed	Information source	Date for completion
N/A	N/A	
N/A	N/A	

For guidance and support with consultation and engagement visit <https://intranet.croydon.gov.uk/working-croydon/communications/consultation-and-engagement/starting-engagement-or-consultation>

3.2 Deciding whether the potential impact is positive or negative

Table 2 – Positive/Negative impact

For each protected characteristic group show whether the impact of the proposed change on service users and/or staff is positive or negative by briefly outlining the nature of the impact in the appropriate column. If it is decided that analysis is not relevant to some groups, this should be recorded and explained. In all circumstances you should list the source of the evidence used to make this judgement where possible.			
Protected characteristic group(s)	Positive impact	Negative impact	Source of evidence
Age	For older people: The aim is to make best use of available resources with partners to develop a sustainable model of adult social care. The process will be informed by the co-designing of the Council's engagement model with people with lived experience. The measures in this Plan will promote the independence, health and wellbeing of older people and keep vulnerable older people safe. The Plan aims to maximise prevention, early intervention and independence, adopting a strengths-based approach, developing	For children and young people and older adults: As delivery and project plans to implement these changes are developed, the limited resources available may create the potential for negative impact to these groups. However, equality analyses will be conducted at that stage to identify them and mitigating actions developed.	Croydon Equality Strategy 2020 to 2024: <ul style="list-style-type: none"> The estimated dementia diagnosis rate for 65+ years has been going up every year in Croydon. 2.9% of all 85+ year olds in Croydon cannot speak English well or at all. There has been a huge increase in unemployment for 18-24 year olds and 50-64 year olds since April 2020. Since 2015 at local, regional and national levels there has been a lower

	<p>reablement, direct payments and care technology offers, and supporting the development of homes that promote independence. It also aims to work with partners to support carers and make Croydon dementia friendly.</p> <p>For children and young people: The Plan aims to ensure that every child and young person can learn, develop and fulfil their potential through work with partners on a youth offer, on mentoring, supporting vulnerable pupils and reducing school exclusions. Partnership work will make Croydon safer for young people and reduce involvement in youth crime, gangs and exploitation. The Plan aims to keep young people safe by transforming and redesigning services so families can access the right support in the right place at the right time, reducing the need for statutory support and intervention. The Council will ensure the voices of children, young people and their families are heard and inform service development and commissioning.</p>		<p>proportion of children from Black backgrounds achieving Attainment 8 scores</p> <ul style="list-style-type: none"> • Like with England as a whole Black Caribbean pupils in Croydon have the greatest level of disproportionately when it comes to exclusion from school.
Disability	<ul style="list-style-type: none"> • The aim is to make best use of available resources with partners to develop a sustainable model of adult social care. This will be informed by the co-designing of the Council's engagement model with people with lived experience. • As with older people, measures in the Plan will promote independence, health and wellbeing of people with disabilities and keep vulnerable people safe. • An updated multi-agency Harm reduction and suicide prevention strategy will also aim to keep people with mental health issues safe. • More pupils with special educational needs and disabilities will be able to attend Croydon schools. • Measures to prevent homelessness and to invest in council homes will benefit people with disabilities. 	<p>As delivery and project plans to implement these changes are developed, the limited resources available may create the potential for negative impact to these groups. However, equality analyses will be conducted at that stage to identify them and mitigating actions developed.</p>	<p>2011 Census figures showed that 14.1% of the population in Croydon had their day-to-day activities limited to some extent by a long-term health problem or disability. 22,493 people had their day to-day activities limited a lot, whilst 28,134 had their day-to-day activities limited a little.</p>

Sex	The strategy to tackle violence against women and girls will aim to increase their safety and support victims.	As delivery and project plans to implement these changes are developed, the limited resources available may create the potential for negative impact to these groups. However, equality analyses will be conducted at that stage to identify them and mitigating actions developed.	Croydon's population is 51.9% female and 48.1% male (Census 2021) In the 12 months to July 2022 Metropolitan Police Statistics recorded 5,230 domestic violence offences (13.4 per 1,000 population, the 4th highest rate in London).
Gender Reassignment Identity	Proposed changes are likely to positively impact this group in the same way as other protected groups.	As delivery and project plans to implement these changes are developed, the limited resources available may create the potential for negative impact to these groups. However, equality analyses will be conducted at that stage to identify them and mitigating actions developed.	The Gender Identity and Research Society has estimated that nationally 1% of the population may be gender variant to some degree, with 0.2% of the population likely to seek medical treatment, at some stage, to present in the opposite gender
Marriage or Civil Partnership			In the 2011 Census, 42.9% of Croydon residents were married, and 0.3% were in a registered same-sex civil partnership.
Religion or belief			56.4% of respondents to the 2011 Census in Croydon stated that they were Christian. 20.0% stated that they had no religion. 7.6% did not state their religion.
Race	<ul style="list-style-type: none"> The Plan commits the Council to listen to, respect and work with Croydon's diverse communities. Measures to ensure that every child and young person can learn, develop and fulfil their potential will benefit black pupils, who are more likely to attain below-average scores and to be excluded from school. An annual programme of cultural and community events will help to bring communities together. Work with education and training partners and Croydon's diverse communities aims to create economic opportunity for all and offer all access to skills and jobs. Measures to prevent homelessness will benefit people of BAME backgrounds who are more likely to experience homelessness. 	As delivery and project plans to implement these changes are developed, the limited resources available may create the potential for negative impact to these groups. However, equality analyses will be conducted at that stage to identify them and mitigating actions developed.	<p>Croydon Equality Strategy 2020 to 2024:</p> <ul style="list-style-type: none"> Since 2015 at local, regional and national levels there has been a lower proportion of children from Black backgrounds achieving Attainment 8 scores. Black Caribbean pupils in Croydon (as in England as a whole) have the greatest level of disproportionately when it comes to exclusion from school. <p>Live homelessness statistics:</p> <ul style="list-style-type: none"> Whereas 64.6% of main homeless applicants owed a prevention or relief duty by the council in 2019/20 declared their ethnic origin to be BAME (GOV.UK) 53% of Croydon population are from BAME backgrounds (GLA,

			<i>2016-based Round of Demographic Projections Local authority population projections - Housing-led ethnic group projections, November 2017.)</i>
Sexual Orientation	The proposed changes will positively impact this group in the same way as other protected groups.	As delivery and project plans to implement these changes are developed, the limited resources available may create the potential for negative impact to these groups. However, equality analyses will be conducted at that stage to identify them and mitigating actions developed.	Croydon Equality Strategy 2020 to 2024: Based on ONS estimates, across London it was estimated that 2.6% of the population in 2014 identified themselves as gay, lesbian or bisexual.
Pregnancy or Maternity	Plans to invest in council homes and prevent homelessness will benefit young families who are more likely to be in housing need or homeless.	As delivery and project plans to implement these changes are developed, the limited resources available may create the potential for negative impact to these groups. However, equality analyses will be conducted at that stage to identify them and mitigating actions developed.	Croydon Equality Strategy 2020 to 2024: Over the years, by far the highest proportion of accepted homeless households in Croydon have been made up of lone parents with dependent children (Live tables on homelessness)
<p>Important note: You must act to eliminate any potential negative impact which, if it occurred would breach the Equality Act 2010. In some situations this could mean abandoning your proposed change as you may not be able to take action to mitigate all negative impacts.</p> <p>When you act to reduce any negative impact or maximise any positive impact, you must ensure that this does not create a negative impact on service users and/or staff belonging to groups that share protected characteristics.</p>			

3.3 Impact scores

Example

If we are going to reduce parking provision in a particular location, officers will need to assess the equality impact as follows;

1. Determine the Likelihood of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the likelihood of impact score is 2 (likely to impact)
2. Determine the Severity of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the Severity of impact score is also 2 (likely to impact)
3. Calculate the equality impact score using table 4 below and the formula **Likelihood x Severity** and record it in table 5, for the purpose of this example - **Likelihood (2) x Severity (2) = 4**

Table 4 – Equality Impact Score

Severity of Impact	3	3	6	9
	2	2	4	6
	1	1	2	3
		1	2	3
	Likelihood of Impact			

Key

Risk Index	Risk Magnitude
6 – 9	High
3 – 5	Medium
1 – 3	Low

Table 4 – Impact scores

Column 1 PROTECTED GROUP	Column 2 LIKELIHOOD OF IMPACT SCORE	Column 3 SEVERITY OF IMPACT SCORE	Column 4 EQUALITY IMPACT SCORE
	<p>Use the key below to score the likelihood of the proposed change impacting each of the protected groups, by inserting either 1, 2, or 3 against each protected group.</p> <p>1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact</p>	<p>Use the key below to score the severity of impact of the proposed change on each of the protected groups, by inserting either 1, 2, or 3 against each protected group.</p> <p>1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact</p>	<p>Calculate the equality impact score for each protected group by multiplying scores in column 2 by scores in column 3. Enter the results below against each protected group.</p> <p>Equality impact score = likelihood of impact score x severity of impact score.</p>
Age	2	2	4
Disability	2	2	4
Gender	2	2	4
Gender reassignment	2	2	4
Marriage / Civil Partnership	2	2	4
Race	2	2	4
Religion or belief	2	2	4
Sexual Orientation	2	2	4
Pregnancy or Maternity	2	2	4

4. Statutory duties

4.1 Public Sector Duties

Tick the relevant box(es) to indicate whether the proposed change will adversely impact the Council's ability to meet any of the Public Sector Duties in the Equality Act 2010 set out below.

Advancing equality of opportunity between people who belong to protected groups

Eliminating unlawful discrimination, harassment and victimisation

Fostering good relations between people who belong to protected characteristic groups

Important note: If the proposed change adversely impacts the Council's ability to meet any of the Public Sector Duties set out above, mitigating actions must be outlined in the Action Plan in section 5 below.

5. Action Plan to mitigate negative impacts of proposed change

Table 5 – Action Plan to mitigate negative impacts

Complete this table to show any negative impacts identified for service users and/or staff from protected groups, and planned actions mitigate them.				
Protected characteristic	Negative impact	Mitigating action(s)	Action owner	Date for completion
Disability	As delivery and project plans to implement these changes are developed, the limited resources available may create the potential for negative impact to these groups.	Equality analyses will be conducted at that stage to identify them and mitigating actions developed.	Heads of service	TBC
Race				
Sex (gender)				
Gender reassignment				
Sexual orientation				
Age				
Religion or belief				
Pregnancy or maternity				
Marriage/civil partnership				

6. Decision on the proposed change

Based on the information outlined in this Equality Analysis enter X in column 3 (Conclusion) alongside the relevant statement to show your conclusion.		
Decision	Definition	Conclusion - Mark 'X' below
No major change	Our analysis demonstrates that the policy is robust. The evidence shows no potential for discrimination and we have taken all opportunities to advance equality and foster good relations, subject to continuing monitoring and review. If you reach this conclusion, state your reasons and briefly outline the evidence used to support your decision	
Adjust the proposed change	We will take steps to lessen the impact of the proposed change should it adversely impact the Council's ability to meet any of the Public Sector Duties set out under section 4 above, remove barriers or better promote equality. We are going to take action to ensure these opportunities are realised. If you reach this conclusion, you must outline the actions you will take in Action Plan in section 5 of the Equality Analysis form <i>The priorities and high-level actions of this plan aim to benefit several groups of people that share protected characteristics, with no negative impacts currently identified. They incorporate measures that will advance equality and foster good relations. The Plan includes measures to listen to and involve residents in the design and review of services. As delivery and project plans to implement these changes are developed, the limited resources available may create the potential for negative impact to these groups. However, equality analyses will be conducted at that stage to identify them and mitigating actions developed.</i>	X
Continue the proposed change	We will adopt or continue with the change, despite potential for adverse impact or opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the change. However, we are not planning to implement them as we are satisfied that our project will not lead to unlawful discrimination and there are justifiable reasons to continue as planned. If you reach this conclusion, you should clearly set out the justifications for doing this and it must be in line with the duty to have due regard and how you reached this decision.	
Stop or amend the proposed change	Our change would have adverse effects on one or more protected groups that are not justified and cannot be mitigated. Our proposed change must be stopped or amended.	
Will this decision be considered at a scheduled meeting? e.g. Contracts and Commissioning Board (CCB) / Cabinet		Meeting title: Cabinet Date: 12 October 2022

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7. Sign-Off

Officers that must approve this decision		
Equality lead	Name: Gavin Handford	Date: 06.09.2022
	Position: Director of Policy, Programmes and Performance	
Director	Name: Gavin Handford	Date: 06.09.2022
	Position: Director of Policy, Programmes and Performance	

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Agenda Item 7

REPORT TO:	Cabinet 16 November 2022
SUBJECT:	Regina Road Estate, Norwood
LEAD OFFICER:	Susmita Sen, Corporate Director for Housing
CABINET MEMBER:	Councillor Lynne Hale, Deputy Executive Mayor and Cabinet Member for Homes
WARDS:	All

SUMMARY OF REPORT:

This report proposes action to begin the process of addressing the current and recurring unsatisfactory situation at the Regina Road estate where three ageing tower blocks require intervention to ensure modern social housing fit for the 21st Century. The unsatisfactory situation has developed over recent years because of the failure to resolve key maintenance issues and to respond in a timely way to the conditions highlighted at Regina Road.

The report includes a review of studies previously commissioned by the Council, a summary of the experiences of some other local authorities who have faced similar issues with their tower blocks and a review of research conducted by the Building Research Establishment on Large Panel Systems. These lead to a conclusion that the Council must either commit to significant refurbishment works or demolish and rebuild the tower blocks at Regina Road.

The report sets out for approval the Council's draft statutory arrangement for consulting with tenants on housing management matters; the proposal for consultation on the options to refurbish or demolish and redevelop Regina Road estate under these arrangements; the proposal for consultation on draft Resident Offers for tenants and leaseholders/freeholders on the estate. The residents will be consulted on these proposals during December/January and the outcome reported back to Mayor and Cabinet in early 2023.

FINANCIAL IMPACT:

The proposals sit within the Housing Revenue Account (HRA) and therefore will have no direct financial impact on the Borough's General Fund. Some of the recommendations implemented will have an attached financial cost to the HRA. This will be included in the costs of the overall Housing Business Plan being developed for the Council.

Any costs incurred in the future to deliver the plan will have gone through the Council's existing controls to ensure the expenditure is essential and represents good value for Croydon. Any costs in the current year will need to be contained within the existing approved budget for 2022/2023 to ensure Members are sighted.

KEY DECISION REFERENCE NO.: 5122EM

RECOMMENDATIONS:

The Executive Mayor in Cabinet is recommended to:

- i. Consider and approve the proposed arrangements for consulting with secure tenants and introductory tenants on matters of housing management for the purposes of sections 105 of the Housing Act 1985 and 137 of the Housing Act 1996 as set out in Appendix 1
- ii. Agree that residents be consulted in accordance with Section 105 of the Housing Act 1985 and, to the extent relevant, under section 137 of the Housing Act 1996 on the proposals to refurbish or demolish and redevelop those properties within the Regina Road estate, as defined on the plan attached as Appendix 2.
- iii. Note at Appendix 3 the comments arising from early engagement with tenants, leaseholders and freeholders in the Regina Road area at the resident engagement workshops held locally during October.
- iv. Agree that residents (including tenants, leaseholders and freeholders) be consulted on the proposed contents of the Tenant and Leaseholder/Freeholder Offers at Appendices 4 and 5 for those properties within the Regina Road estate, as defined on the plan attached as Appendix 2.
- v. The outcome of the consultations at recommendations ii) and iv be reported back to the Mayor and Cabinet in early 2023.
- vi. Subject to the outcome of the consultations, a report be brought back to the Mayor and Cabinet on a ballot of residents for the purpose of GLA funding.
- vii. Agree that no further tenancies, permanent or temporary, be granted at any of the properties within the Regina Road estate, as defined on the plan attached at Appendix 2, with the exception of properties - nos 89-123, 112,114, 116-126, & 128 Regina Road, & 1-4B & 5-8B Sunnybank - which can only be used for non-secure licensees when vacancies occur because these properties do not suffer from the same conditions and issues as the tower blocks.
- viii. Agree to the appointment of an Independent Tenant and Leaseholder advisor to provide independent support to tenants, leaseholders and freeholders throughout the consultation period and up to and including any ballot/s.
- ix. Approve all necessary expenditure, including architectural fees, surveys, option appraisals, and an Independent Tenant & Leaseholder Advisor, as detailed in paragraph 9.4.

1. LIST OF APPENDICES:

Appendix 1 – Proposed LB Croydon Arrangements for Statutory Consultation under Sections 105 of the Housing Acts 1985 and 107 of the Housing Act 1996

Appendix 2 - Plan No.1 showing location of the three tower blocks and surrounding medium and low-rise development within a boundary

Appendix 3 - Record detailing what residents of the Regina Road area (as defined within the boundary shown on Plan No. 1 in Appendix 2) have said to the Council at the resident engagement sessions held locally during October

Appendix 4 – Draft Tenant Offer for consultation

Appendix 5 – Draft Leaseholder/Freeholder Offer for consultation

Appendix 6 - EQIA

2. BACKGROUND

- 2.1 The Regina Road Estate was developed as social housing by the Borough in the mid-1960s. The estate includes three 11-storey tower blocks built using the Wates Large Panel System (LPS), each with 44 flats. The wider estate contains four medium-rise blocks close to the tower blocks, (with 42 flats) and additional low two-storey housing some of which are included in the scope of this report for consultation on redevelopment. Appendix 2 shows the extent to be considered for inclusion in a potential redevelopment area. This area includes some green space, a play area and a kindergarten.
- 2.2 The three tower blocks were retrofitted with insulated cladding c.1999 as part of a refurbishment project to improve living conditions. However, the flats in the tower blocks – particularly in nos 1-87 - have suffered in recent years from a variety of issues including water penetration, condensation and mould that have proved difficult to rectify. This unsatisfactory situation has developed over recent years because these key maintenance issues, highlighted by residents, were not addressed in a timely way. Major refurbishment works are needed if the blocks are to remain in use longer-term.
- 2.3 This report considers the options open to the Council in working with its residents towards a long-term solution to the difficulties currently being experienced by residents at Regina Road.
- 2.4 There are 39 other HRA owned residential tower blocks in Croydon. These are to be reviewed in the context of the Housing Investment Plan, currently in preparation but fall outside of the remit of this report.

3. REGINA ROAD LPS TOWER BLOCKS

- 3.1 The three tower blocks at Regina Road were built in the 1960s by Wates using a Large Panel System (LPS). LPS blocks were largely built using unskilled

labour and have proved problematic for many local authorities. Extensive research was conducted by the Building Research Establishment (BRE) following the 1968 partial collapse of Ronan Point (built using a different LPS) and resulted in two major reports in 1986 and 1987 which highlighted the need for regular monitoring and structural repair of LPS tower blocks. In the 1987 report BRE highlighted, in their opinion, the major issue of the environment within LPS flats and the need to limit condensation and mould growth at reasonable cost – an issue that flats at Regina Road continue to suffer.

- 3.2 The new Building Safety Regulator has been established within the Health & Safety Executive as a consequence of the 2017 Grenfell Tower fire. The Regulator requires registration of all residential buildings 18 metres and higher or seven storeys and above. Officers expect registration of relevant LBC buildings to be made in January 2023, with a subsequent requirement for each registered building to be licensed for residential use. The licensing process is expected to include a range of issues, but particularly structural stability and fire safety.
- 3.3 In 2012 BRE published its Handbook for the structural assessment of LPS dwelling blocks. This Handbook covers the impact on structural stability of accidental loading, either from explosions that might be caused by non-mains gas or by other reasons, or trauma such as from a refuse vehicle hitting the building. It is expected that the guidance in this Handbook will be used by the new Building Safety Regulator in its forthcoming structural assessments of LPS blocks which will form part of the licencing requirements.
- 3.4 In terms of structural safety, the three Regina Road LPS tower blocks will soon require detailed structural assessment, design and costing, alongside necessary refurbishment and longer-term fire safety works. Structural strengthening of LPS blocks is only likely to extend life for 25 years before further structural works and refurbishment would be needed in accordance with Building Safety legislation and BRE advice.
- 3.5 Regarding fire safety, the three blocks have B2 status EWS1 certificates which means that an adequate standard of safety has not been achieved and that LBC has been advised of the remedial and interim measures required. However, the Fire Engineer signing the EWS1 Forms does ‘...not consider the risk to life safety to be high, in the interim the risk is tolerable. The recommendations have been made to enhance the level of life safety to the occupants considering the occupancy type, building height and single stair core nature.’ Also ‘Based on our findings we consider that there is not an immediate risk to life safety, primarily on the basis of the non-combustible materials used for the main cladding system and sprinklers being present.’ The effect of this is that it is very difficult for funding to be obtained from mortgage lenders pending completion of the necessary works to obtain an A status EWS1 certificate. The recommended works of the greatest priority are currently being undertaken pending decisions on the future of these blocks.
- 3.6 Regarding health safety, BRE has stated that a major issue with LPS flats is that they are prone to condensation and mould growth. The three towers at Regina Road suffer persistently from mould growth. The Housing Ombudsman

Service has published a 'Spotlight on: Damp and Mould' which highlights, for example, that structural factors such as property age, design and modifications affect the risk profile, as does concrete construction, and that significant investment can be required to address the issues.

- 3.7 It would be very difficult to establish exactly why there is persistent mould growth at Regina Road. Most likely it is a combination of circumstances. It might be linked to modern living practices within a building that was built in an earlier era with low-cost energy when such buildings were more comprehensively ventilated. Or it might be related to the original 1960s design that has been adapted over the years to provide increased insulation and different heating systems. Interstitial condensation might be occurring unnoticed within the structure of the building and causing hidden mould growth which then spreads with air movement. There might even be local factors such as a particular microclimate around Regina Road involving, for example, differing air movement and temperature patterns arising from localised ground conditions and nearby buildings. An appropriate conclusion might be that the tower blocks are no longer fit for purpose and that the most effective remedy may be to demolish.
- 3.8 A desk top review was conducted on recent surveys commissioned by LBC for Regina Road, the above EWS1 Certificates, together with further discussions with structural engineers, BRE and four major Councils - three in London and one on the South Coast - relating to decisions on post-Ronan Point LPS blocks. This research indicates that there is sufficient technical information on which to base a decision on whether the three tower blocks at Regina Road have reached the end of their economic life.
- 3.9 It is not clear from records that remain with LBC as to the works carried out to the three towers as part of the refurbishment c. 1999, or post-Ronan Point. What is clear is that the recent issues at the Regina Road Tower Blocks now require longer-term addressing either through significant refurbishment (including structural works) and or through demolition and rebuild. Both options will require residents to move out whilst the work is being undertaken.
- 3.10 On decisions by other Councils, Council A chose to demolish some of its LPS blocks following structural surveys carried out in 2019. Their structural consultants pointed out the age of the buildings and the need for regular, invasive testing of LPS buildings. Council B and Council C also chose to demolish some, depending on wider considerations as well as remaining life while also noting that 'strengthening works to retain the blocks is practically difficult and financially unviable.' Council B estimated structural strengthening works at £74,721 per flat in January 2020 while Council C estimated £316,176 per flat in January 2019.

4. REFURBISHMENT OR REBUILD

- 4.1 LBC's consultant Ridge & Partners in 13/12/21 estimated the refurbishment costs at nos 1-87 Regina Road. Fire Risk Assessment associated works were costed, but did not include structural works pending further investigation nor any additional fire safety works that might be required by the Building Safety

Regulator. It is not known without major and invasive structural investigations what reasonable remaining life might be achievable on these tower blocks which are now nearly 60 years old. To rebuild as 44 x 1-bed flats were estimated by Ridge to cost £14,105,000. However, the new build would be to current standards and have a life of at least 60 years.

4.2 **Table 1 - Comparing potential Refurbishment with Rebuilding for a block of 44 flats on the same site at 2021 prices**

	Refurbish	Per unit	Rebuild	Per unit
Ridge	£8,733,000	£198,500*	£14,105,000**	£320,500**
Extra structural works	£3,600,000 – £13,912,000 (average £8,756,000)	£82,000 - £316,000 (average £199,000)	-	-
Total (with structural average)	£17,489,000	£397,500*	£14,105,000**	£320,500**
GLA grant possible	Unlikely	Unlikely	Yes	Yes
Expected life	25 years		60 years minimum	
EWS1 A Fire Safety	probably		Yes	
Modern space standards	no		Yes	
Outdoor space/balcony	no		Yes	
Pas2035 thermal comfort	no		Yes	
Wheel-chair friendly	no		Yes	
Family-sized homes	no		Dependent on housing need	

* potential leaseholder liability **includes demolition

Since December 2021 £370,000 (excluding on-costs - £8,410 per unit) basic refurbishment works have been carried out - not included in above totals.

Table 1 shows that, on current desk-top assessment, refurbishment is likely to cost more than like-for-like rebuild and that there will be substantial liabilities for leaseholders. When considering the options to refurbish vs rebuild it is worth noting that a key point arising from refurbishment is the potential charge to leaseholders. This charge would not arise with rebuilding, where leaseholders would be able to realise market value. Please note that the prices referred to are historic and future prices are likely to be higher.

Note : The only way to be more confident over costings over structural and service stack issues is to conduct invasive tests that will require residents to move out. This will cost significant sums in fees, building work and lost rent, as

well as disruption to tenants, while also adding many months to the decision-making process. This desk top review judges that there is sufficient evidence that the structural issues are such to demonstrate that the towers are at the end of their economic and structural lives. The impact of the persistent mould problems separately points to a similar conclusion that the towers are no longer fit-for-purpose.

4.3 On quality of outcome, refurbished flats would fall short on some current space standards, have lower ceilings, no outdoor balcony space, probably not meet the new Pas2035 retrofit standards for thermal comfort, and have limited life. The carbon cost of refurbishment, plus poorer insulation relative to new build, may also be higher – a detailed assessment is being progressed. There are no family-sized homes in the tower blocks, nor wheelchair adapted homes.

4.4 In moving forward, it is important to follow a proper process in resident consultation on the future of Regina Road. This is important for at least three reasons:

- Firstly, it is a legal requirement under Section 105 of the Housing Act 1985 and section 137 of the Housing Act 1996 for statutory arrangements regarding consultation with residents to be adopted and adhered to prior to the Council progressing with decisions on what the appropriate course of action ought to be.

- Secondly, one of the Council's priorities is to listen to residents to work out the outcome achievable together which will deliver the best quality and best value for money. This is reinforced by the Residents' Charter which gives a clear commitment and undertaking to 'Fully involving our residents in decisions which impact their housing or housing services.' The report to members reiterating the Charter contents stated that:

'The Council is therefore committing to fully involve residents in:
* all major policy decisions impacting on residents

* the monitoring of the Council and Housing Department's performance on services impacting on residents

* any changes materially impacting residents either individually, in their block or their estate.'

- Thirdly, in obtaining the best value for money outcome, it becomes possible, depending on the outcome of the statutory consultation referenced above, to work with the GLA and Government to maximise the amount of financial support that might be forthcoming. Since July 2018 the GLA has required any landlord seeking GLA funding for estate regeneration projects which involve the demolition of any social homes (and the construction of 150 or more homes of any tenure) to show that residents have supported their proposals through a ballot. This is to make sure that GLA funding only supports estate regeneration projects if residents have a clear say in plans and support them going ahead.

- 4.5 The GLA has published good practice guidance and principles to achieve successful Estate Regeneration. This guide includes requirements for full and transparent consultation and involvement with those affected by the project from the outset. The GLA are aware of the position at Regina Road. Subject to the outcome of consultation on the option of refurbishment or demolition and redevelopment, it should be possible for LBC to apply for GLA funding from the GLA's 2021-2026 Programme, which would mean new homes must be completed during 2028 at the latest. Apart from funding for additional social housing, there may be the opportunity for a scheme like Regina Road to qualify for grant to assist replacement social housing (which adds to the cost effectiveness of rebuilding over refurbishment). There are likely to be further GLA funding programmes for completions after 2028, but as yet undetermined. Subject to the outcome of the consultation, an early ballot is feasible and would enable application for GLA funding towards rebuilding costs.
- 4.6 For successful resident engagement LBC will need to be up-to-date with best practice across London as well as national and regional guidance. Inner Circle were commissioned recently to update earlier work with regard to best practice on resident offers that can be applied at Regina Road. Subject to the outcome of consultation at Regina Road and its application, these policies might be capable of being applied across the Borough, subject to Borough-wide consultation.

5. RESIDENT ENGAGEMENT & CONSULTATION

- 5.1 The Regina Road tower blocks have lacked investment for several years. The Council has undertaken a series of actions since March 2021 to address the concerns of residents and try to start to re-build trust with the local community. The initial response included a team of housing officers who spoke to residents at the door to get an understanding of the issues residents were experiencing in their homes. Several meetings - to which all residents were invited - have taken place and a drop-in has been operational since September 2021. A regular newsletter and bulletin for Regina Road are produced for residents. These contain contact details for key housing officers for Regina Road, ways to get involved, and who to talk to if there are problems. Noticeboards are updated with new information and bulletins as they are published. It is worth noting that 23 flats are now empty due to the unsatisfactory conditions.
- 5.2 A reference group was also formed at the beginning of 2022 consisting of a small group of residents representing all three blocks on the estate. It was created to support and engage with residents about repairs, works and improvements taking place at Regina Road over the short, medium and looking ahead to the future.
- 5.3 A Walkabout was held with residents of the three tower blocks on the evening of Wednesday, 13 July 2022. The main issues raised were repair issues, some dating back several years and related to general whole block fabric/service failures which keep re-occurring despite repeated attempts to fix. Residents present understood the difficulties associated with blocks nearly 60 years old and emphasised they would appreciate new homes in preference to the

continuous process of patching old homes. Some residents said they would be happy to move away from Regina Road.

- 5.4 What has become very clear in recent months is that the tower blocks are in a poor state of general repair and this situation is causing frustration for residents. Recent engagement sessions have focused on hearing the views of residents and trying to establish channels for communication and consultation going forward on the future of Regina Road.

Three listening meetings with residents were held on 7, 13 & 17 October, including those of homes within the area of Plan No. 1. These meetings aligned with the objectives listed in the Residents' Charter agreed by the Council in June. The purpose of the meetings was to share with residents the findings of our research so far and to commence discussions on the future of Regina Road and to hear their initial views and concerns. The outcome of these listening meetings are detailed in Appendix 3 and cover areas such as:

- a preference for continuing to live in South Norwood, convenient & friendly
- disappointment with the past Housing service
- enjoy the view of the green space
- general support for rebuilding (although some prefer refurbishment)
- timescale
- many questions about the detail of what it means for them personally as a tenant/leaseholder/freeholder
- housing need questions
- issues about mould

A letter is being sent to all residents who attended thanking them for their time, summarising key points made and setting out next steps.

- 5.5 It is important that going forward we engage in additional sessions with residents of the estate to discuss the potential future options.
- 5.6 Subject to Mayor in Cabinet agreement, next steps include formal consultation on the future of the Regina Road estate with all the residents affected (as defined on Plan No. 1) in accordance with Housing Act obligations. This will involve approving the proposed arrangements for consulting with secure tenants and introductory tenants on matters of housing management at Appendix 1 under Section 105 of the Housing Act 1985 and Section 137 Housing Act 1996.
- 5.7 The next few months will see extensive work involving many meetings with residents. The first consultation is regarding residents' views on refurbishment as opposed to demolition and rebuilding. Table 1 in section 4 demonstrates that comprehensive refurbishment is likely, on the current costings, to cost more than rebuilding to modern standards and may not deliver the longevity and modern standards desired. In addition, there remain uncertainties over mould eradication, potential for falling short on key areas such as expected life, modern fire safety, space standards, balcony/outdoor space, thermal comfort, wheelchair-friendly and family sized homes. These shortcomings outlined in Table 1 will be explained to residents. Equally, residents will want to be assured about the potential benefits of having a new, well-built modern home, so a basic specification for a modern home will be shared during consultation alongside

some assessment of how rebuilding might be carried out. Regardless of whether residents favour refurbishment or demolition and redevelopment, they will wish to know how the options impact on them and their families.

5.8 The statutory consultation will be in parallel with the consultation on the draft Tenant and Leaseholder/Freeholder offers for the Regina Road estate, which are set out in Appendices 4 and 5 for Mayor in Cabinet to approve as drafts for consultation purposes.

5.9 Regardless of whether residents favour refurbishment or demolition and redevelopment, they will wish to know how the options impact on them and their families. It is common practice for schemes such as at Regina Road to set out separately defined and clear offers for tenants and homeowners, outlining what they can expect from the Council as their homes undergo refurbishment or redevelopment. These commitments (sometimes called a Resident offer or Key Guarantees/Commitments) will then guide the rehousing process but critically, if a ballot is appropriate at a later stage, it will also form the basis for the Resident Offer for any resident ballot that may take place. The forming of a Resident Offer is critical in any estate regeneration programme to:

- Give certainty to residents as to how the proposals will affect them.
- Reassure them that an appropriate housing option will be in place.
- Set out how they will be compensated for the disruption.
- Provide a basis for negotiation to achieve vacant possession.
- Provide the foundation to build support for a resident ballot (if required).
- Provide an evidence base for obtaining possession through CPO or Ground 10a action of the Housing Act 1985, if required.
- Ensure adequate resources are secured from the outset to deliver on the commitments.

5.10 The proposed key commitments for Regina Road residents are based on nine guiding principles:

1. Exemplar and inclusive engagement and involvement of residents from the start
2. High quality homes that meet or exceed minimum space standards
3. Resident involvement in design and a choice of fixtures and fittings
4. Keep the community together - one move where possible and Right to Return if required to move temporarily
5. A home for secure tenants that meets their need (or need +1 if over-occupying) and the same tenancy rights
6. A fair deal for leaseholders – including buying back at full market value and options for resident homeowners to purchase.
7. Compensation for the costs and disturbance for moving home
8. Access to free independent advice
9. Support residents with the move, with dedicated support for those with additional needs

- 5.11 The proposed commitments have been developed through an in-depth analysis of resident offers from estate regeneration schemes across London including Tower Hamlets, Hackney, and the following schemes in South London:
- Alton, Wistanley and York Road, Wandsworth
 - High Oath, Eastfields and Ravensbury, Merton
 - South Thamesmead Estate, Bexley
 - Achilles Street Estate, Lambeth
Pike Close, Bromley
 - Lambeth Estate, Lambeth
- 5.12 The review has ensured that the proposed Regina Road tenant and leaseholder commitments are in line with best practice and will provide a strong basis to ensure the proposals have a positive impact on existing residents. The commitments are either legally required or are the minimum standard offered by all the case studies reviewed.
- 5.13 An important point to highlight is that of assessed Housing Need. When the decanting of residents from the tower blocks proceeds, whether for refurbishment or demolition, tenants should be offered a replacement home, whether temporary or permanent, on the basis of their Housing Need at the point of decant.
- 5.14 The formal period for the consultations is recommended as 6 weeks with the intention to have the necessary documents available in late November/December; an extra 2 weeks have been included because of the Christmas holiday period. The intention is to have the outcome of the consultations reported back to Mayor in Cabinet to allow final Resident Offer documents agreed by Cabinet in February 2023.
- 5.15 Subject to the outcome of the consultations, the next stage could be an early ballot of residents, as recommended by the GLA, on whether to proceed with rebuilding. If rebuilding is supported, delivery might be by a range of partnership options involving the Council, Housing Associations and private developers. This will be further elaborated on should the outcome of the consultation suggest re-building is an appropriate option to pursue.
- 5.16 There will in addition be a significant amount of extra work falling on the Council itself. To date, the project has been progressed since July using a part-time senior officer who draws on existing resources across the Council. This needs supplementing going forward with all the additional work falling on the resident engagement team, the decanting of residents, the researching of rebuilding options, dealing with a range of different organisations and developing policies for wider application for what is a major project for the Council. There will need to be a budget for the costs involved, funded from HRA reserves and this is addressed further in the financial implications.
- 5.17 For projects of this nature, it is usual for the Council to appoint an Independent Tenant & Leaseholder Adviser (ITLA) who can give independent advice to residents. A recommendation is made to appoint one.

6. IMPACT ON HRA HOUSING STOCK

6.1 The three tower blocks have suffered for several years from a range of problems. There have been continuous repairs and refurbishments in attempts to tackle water penetration, damp and mould. This is a growing problem. As at 26 October 2022, 23 flats are being held vacant – nearly 18% of the total – as shown by Table 2:

Table 2 – Occupancy of the Three Tower Blocks, as at 26 October 2022

REGINA ROAD	TENANTS	LEASEHOLDERS	VOID	TOTALS
1-87 (1 bed flats)	31	1	12	44
2-56A (2 bed flats)	38	2	4	44
58-108A (2 bed flats)	37	0	7	44
TOTALS	106	3	23	132

Note that this table applies only to the three tower blocks. There are 51 further homes in the low and medium buildings within the area covered by the plan at Appendix 2, with additional tenants and additional leaseholder/freeholders.

6.2 In the light of the growing structural and other issues now apparent, it makes sense not to let any homes that become available pending the outcome of the consultation on refurbishment or demolition and any subsequent decisions. The current 23 vacant flats will need to be secured and there will be a loss of rental income, but there will also be a significant saving on continuous reactive repairs.

6.3 There is also the issue of what to do should tenancies end in any of the low and medium rise surrounding properties within the area covered by Plan No.1. These properties - nos 89-123, 112, 114, 116-126, & 128 Regina Road, & 1-4B & 5-8B Sunnybank - do not have the same disrepair issues as the three tower blocks. It is recommended that any new lettings should be on a non-secure basis and therefore the homes would be available for the time being to those households requiring emergency accommodation.

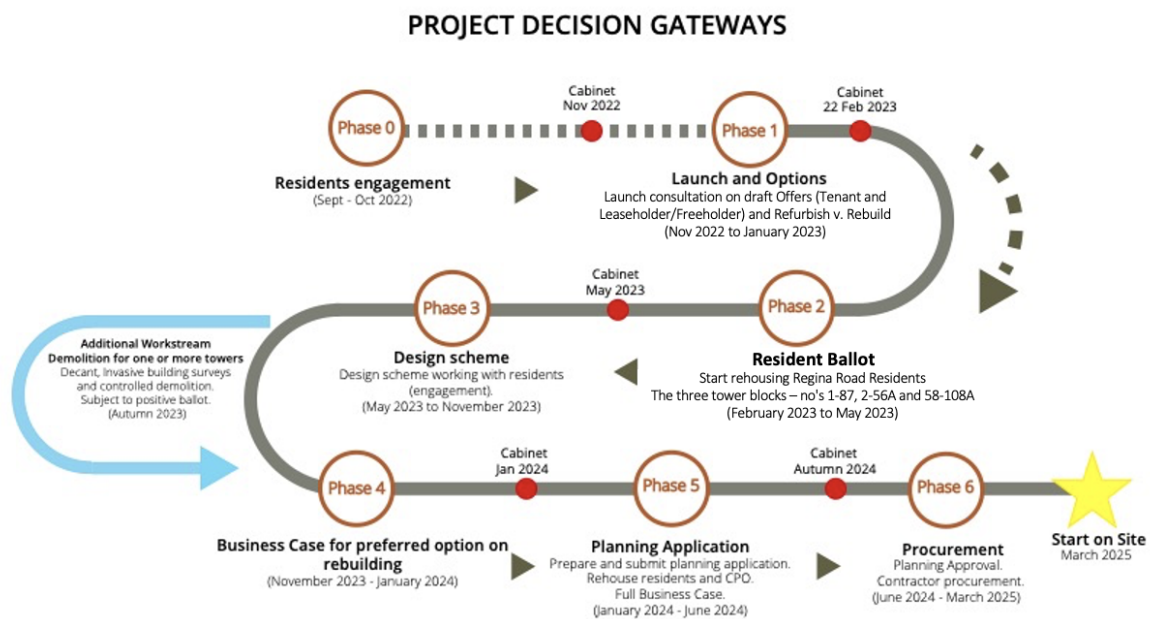
6.4 The methodology of the consultation will be important. Apart from taking account of relevant legislation and GLA requirements, consultation will need to follow the principles in the Residents’ Charter agreed by the Council earlier this year. As the section on Equalities Impact makes clear, Regina Road is home to a wide range of residents, including families, all ages and a mix of backgrounds, needs and ethnicities. Greater emphasis on data collection in relation to protected characteristics to inform decision making will be developed in the imminent Housing Needs survey for Regina Road.

7. NEXT STEPS

- 7.1 The next step is formal statutory consultation, as detailed above, with tenants, leaseholders and freeholders within the area defined by the plan at Appendix 2 on the issue of refurbishment as opposed to demolition and redevelopment and on the draft documents at Appendices 4 and 5.
- 7.2 An EQIA is attached to this report as Appendix 6 which will be updated as the project progresses, especially through the Housing Needs survey to be conducted shortly. Collating data about the protected characteristics of residents living at Regina Road will take time as the information is likely to either not exist or exist in different places, relating to different services. Privacy statements will also need to be prepared to request information about protected characteristics and this will be built into the resident engagement plan as the project progresses.
- 7.3 Equally important is to manage the current situation better. The immediate focus is making sure that residents are experiencing better management than previously. Accordingly, an officer working party on Regina Road has been established to co-ordinate officer decisions and oversee rebuilding confidence.
- 7.4 A corporate working party is also being established to ensure this major project is supported corporately across the Council.
- 7.5 The Council will also need to be mindful of the costs of delivery at Regina Road relative to the needs of the housing stock generally throughout the Borough and the need for additional homes. Any decisions on building extra capacity beyond replacement homes will need to accord with the Local Development Plan and may need to involve a mix, which could potentially include the Council (to ensure all existing tenants are rehoused), a Housing Association (to increase housing options for local residents), and a private housebuilder (with options for leaseholders/freeholders).
- 7.6 Subject to the outcome of the consultation, should the Council agree in due course, after ballot, to demolish the three LPS blocks at Regina Road, it will be important for the Council to gain information relevant to its remaining LPS blocks which would be the subject of future reports as and when necessary. This could inform future decisions on whether to refurbish or rebuild these other blocks. Some Councils have done this by building into demolition specifications the ability of structural engineers to examine some of the key structural elements, normally hidden from sight without major intrusive building works. The focus would be on structural elements which are known to be potentially weak in LPS structures. While no two tower blocks are identical, this approach would give crucial information on how best to tackle the 13 remaining LPS blocks in Council ownership and what their remaining structural life might be. Residents of these tower blocks are receiving a letter drawing their attention to this Cabinet Report and assuring them that they will be kept informed of the information that the Council may be able to obtain from structural testing of any demolitions at Regina Road and the relevance, if any, to the block in which they live.

8. TIMESCALE

- 8.1 If Cabinet agrees to proceed, resident consultation required by the Housing Acts 1985 and 1996 will proceed immediately. The first stage will be formal consultation for six weeks on the option to demolish or refurbish, together with consulting on proposed tenant, leaseholder and freeholder offers at Appendices 4 and 5. The documents will inform residents on what the process will mean for them as they potentially move from one home to another. Subject to the outcome of the consultations and a report back to Members on the outcome, the second stage could involve a ballot of affected residents during early 2023. All this takes time and so it may be Summer 2023 before any final decision on refurbishment or rebuilding might be taken.
- 8.2 The roadmap below indicates the main phases and gateways for possible future stages of the project. There is the key date of Cabinet in February 2023 when the results of statutory consultation will be reviewed and decisions taken on any ballot. The potential timescale is also shown if decisions were to be taken to rebuild instead of refurbishing:



9. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 9.1 There are several options that can be considered in due course on how any scheme at Regina Road might be delivered. These range from refurbishment to a Council-led rebuild project which would replace and add to the Council's stock of social housing as well as partnership options with Housing Associations and/or private housebuilders with different cost profiles. Or a mix of options.
- 9.2 At this very early stage some very broad headline costing has been undertaken on a Council-led project, whether refurbishment or rebuilding. Because the Council would be the sole client, this should be the quickest way to achieve early delivery.

9.3 At current prices, for very broad costing purposes on what refurbishment or rebuilding might cost, a figure of £50 million has been assumed for funding a maximum of 140 Council homes (the number of homes expected to be needed at Regina Road if every existing secure tenant within the area defined on the plan attached as Appendix 2 wanted a new Council home at Regina Road). This figure is before any grants or capital receipts. A high-level review of the existing HRA Business Plan shows a project of £50m could be afforded by the HRA but would significantly increase the level of borrowing within the plan. This opinion is based on the below assumption:

- An additional £10m of expenditure/borrowed funding is added each year for 5 years to the current/existing property development programme
- Assuming the current development plans remain & this regeneration is in addition to it,
- The model has assumed borrowing requirement in future years to be able to meet the development requirements of the existing housing stock therefore this is an additional £50m of borrowing
- No changes to the number of properties has been assumed
- An average interest rate of 3% PA over the 30 year business plan life was assumed at the time of modelling. A higher interest rate now seems likely and will need to be scenario tested as part of feasibility work. Use of HRA reserves, Right to Buy receipts and GLA grant all to be considered as part of the funding mix alongside the borrowing required.
- The HRA CFR (Capital Financing Requirement) currently is £334m opening for 22/23 will be £334m
- The borrowing cap was lifted for the HRA but on a prudent basis most LA's would set a debt cap (to be agreed with the S151 officer) but if we assume the £500m per last year's plan then it is within the limit
- Business plan would remain viable as the revenue income continues to meet the borrowing requirement
- Plan assumes debt increases on the HRA with no planned repayment of the debt just maintenance of the debt (interest repayments).

9.4 There is currently no budget for progressing a solution to Regina Road. Estimated spend in 2022/23 is £300k and feasibility work can be expected to continue into 2023/24 at a similar pace. This will be part of the overall project capital cost although must remain funded by in-year revenue (which makes up around £10m of the capital funding each year). This spend can be included as part of the financial modelling work required to set a capital budget for the overall project.

9.5 The Council will be proceeding at risk in not granting new tenancies in the tower blocks pending a final decision on demolition/major refurbishment. While some of this expenditure will be necessary to demonstrate to residents what refurbishment or rebuilding would mean for them, there is the possibility that residents might not support redevelopment.

9.6 Other risks include:

- Economic uncertainty particularly around the possibility of a further rent freeze or cap restricting the financial flexibility within the HRA
- Viability as seen by any development partners such as Housing Associations or private developers, coupled with site attractiveness relative to other development opportunities in South London
- Residents might not support rebuilding of the three tower blocks
- Residents of medium and low-rise development within the plan at Appendix 2 might prefer refurbishment to address the obsolescence of their homes rather than rebuilding
- Critics might argue that refurbishment is more sustainable than redevelopment, so whole life carbon assessments will be needed alongside option development to refute any criticism
- Leasehold/freehold properties might in due course require Compulsory Purchase Orders which would delay progress
- Some tenants may need to move more than once, with a right-to-return

9.7 Approved by Orlagh Guarnori/Sarah Attwood, Head of Finance Housing

10. LEGAL CONSIDERATIONS

- 10.1 The Head of Litigation and Corporate Law comments on behalf of the Director of Legal Services and Monitoring Officer that the Council is required, under Section 105 of the Housing Act 1985 to maintain such arrangements as it considers appropriate to enable those of its secure tenants who are likely to be substantially affected by a matter of housing management (a) to be informed of the authority's proposals in respect of the matter, and (b) to make their views known to the authority within a specified period; and the Council shall, before making any decision on the matter, consider any representations made to it in accordance with those arrangements.
- 10.2 For the purposes of section 105, a matter is one of housing management if, it relates to the management, maintenance, improvement or demolition of dwelling-houses let by the authority under secure tenancies, or the provision of services or amenities in connection with such dwelling-houses; but not so far as it relates to the rent payable under a secure tenancy or to charges for services or facilities provided by the authority. It applies to all matters of housing management which represent a new programme of maintenance, improvement or demolition, or a change in the practice or policy of the authority, and are likely substantially to affect either its secure tenants as a whole or a group of them who form a distinct social group or occupy dwelling-houses which constitute a distinct class (whether by reference to the kind of dwelling-house, the housing estate or other larger area in which they are situated).
- 10.3 The Council as landlord is required to publish details of the arrangements which it makes under section 105, and a copy of the documents published under this subsection shall be made available at the authority's principal office for inspection at all reasonable hours, without charge, by members of the public, and be given, on payment of a reasonable fee, to any member of the public who asks for one.

- 10.4 Section 137 of the Housing Act 1996 places the same duties on the Council as Section 105 referenced above except that these provisions relate to introductory tenancies and require arrangements to be adopted and published for that purpose prior to the Council adhering to those arrangements before making any decisions on a housing management issue covered by the section.
- 10.5 In undertaking consultation, the Council must adhere to the following principles:
a) consultation must be at a time when proposals are still at a formative stage;
b) proposer must give sufficient reasons for any proposal to permit of intelligent consideration and response; c) adequate time must be given for consideration and response; and d) the outcome of consultation must be conscientiously taken into account in finalising any statutory proposals.
- 10.6 In respect of the draft Tenant and Leaseholder/Freeholder Offers (“Offers”) which is proposed to be the subject of a consultation if consultation is agreed as part of the recommendations to this report: Where the Council is preparing an Offer for the purposes of complying with potential future GLA funding requirements (subject to the outcome of the statutory consultation for housing management matters referred to above and eligibility for GLA funding in respect of the project) the Offer document needs to comply with the following requirements which are specified by the GLA:
- Offer documents must contain sufficient information for eligible residents to make an informed decision about the future of their estate. As a minimum, the Offer must include the following:
- The broad vision, priorities and objectives for the estate regeneration, including information on:
 - o Design principles of the proposed estate regeneration.
 - o Estimated overall number of new homes.
 - o Future tenure mix.
 - o Proposed associated social infrastructure.
 - Details of the full right to return or remain for social tenants living in homes that are to be demolished.
 - Details of the offer for leaseholders and freeholders of homes that are to be demolished.
 - Commitments relating to ongoing open and transparent consultation and engagement.
- 10.7 The need to rehouse tenants arises because of the Council’s actions and not because of transfer applications made by them. Therefore, the provisions of Part 6 Housing Act 1996 do not apply to the transfers under these proposals by virtue of section 159(4A) Housing Act 1996. The duty on the local authority to rehouse the displaced person is separate from an authority's homelessness duties under the Housing Act 1996.
- 10.8 The Council’s Allocation scheme (“the Scheme”) provides that the scheme nonetheless accords secure tenants Band 1 priority where they are required to be decanted (moved from their current property) where it is necessary to allow the carrying out of major works to their block (refurbishment), or it is part of a regeneration scheme which requires demolition and redevelopment and the secure tenant cannot remain in occupation while the works are carried out. In

addition, the Allocations scheme provides that they will be offered temporary accommodation in suitable alternative accommodation while the refurbishment or demolition and redevelopment work is carried out. The Scheme also provides that in such circumstances the secure tenant will be given the choice to return.

- 10.9 Whether a decision is taken to demolish any of the blocks or to undertake refurbishment works, the Council is entitled to possession under Ground 10 Schedule 2 Housing Act 1985. When relying on Ground 10, it is required to secure that there is suitable alternative accommodation available to the tenant.
- 10.10 Any Local Lettings Plan which is proposed to be adopted by the Council as provided for in the Council's Allocation Scheme is governed by the provisions of section 166A(6)(b) Housing Act 1996 (as amended). Section 166A(6)(b) of the 1996 Act enables housing authorities to allocate particular accommodation to people of a particular description, whether or not they fall within the reasonable preference categories and the draft Local Lettings plan as part of the Offer documents sets out the principles and procedures proposed to be adopted, subject to consultation, by the Council for the allocation of housing to Council tenants who will be affected by the refurbishment or demolition and redevelopment at the Regina Road Estate.
- 10.11 The Land Compensation Act 1973, and regulations published thereunder makes provision for compensation including via homelessness payments, disturbance payments and basic loss payments which secure tenants, leaseholders and freeholders on the affected estate may be entitled to in certain circumstances and sets the statutory limits for some of these compensation entitlements.
- 10.12 Whilst the Building Safety Act 2022 will place requirements on the Council as Accountable Person under the Act in respect of "higher risk" buildings under that Act to develop and produce a "residents' engagement strategy" for promoting the participation of relevant persons in the making of building safety decisions, those provisions are not yet in force although their requirements may come into force during the lifetime of this proposed project and officers will need to be mindful of the potentially changing and/or additional obligations these requirements would place on the Council, including in terms of additional statutory consultation with affected residents.
- 10.13 Approved by Stephen Lawrence-Ormense, Director of Legal Services and Monitoring Officer

11. HUMAN RESOURCES IMPACT

- 11.1 The only immediate human resources impact in regard to this report is the recruitment of a small team to focus on Regina Road, the costs of which are included in the Financial implications. This will be managed under the Council's Recruitment Policy. If any other issues should arise these will be managed under the Council's policies and procedures.

11.2 Approved by Jennifer Sankar, Head of HR for Housing Directorate and Sustainable Communities, Regeneration and Economic Recovery, for and on behalf of Dean Shoesmith, Chief People Officer

12. EQUALITIES IMPACT

12.1 The Council has a statutory duty, when exercising its functions, to comply with the provisions set out in the Sec 149 Equality Act 2010. The Council must, in the performance of its functions, therefore have due regard to:

(a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;

(b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;

(c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

12.2 Regina Road is home to a wide range of residents, including families, ageing residents, and a mix of backgrounds, needs and ethnicities. The location was placed in the public arena during 2021 when news of the poor housing conditions at the location were in the media. There were several allegations of racial discrimination from residents regarding how housing staff behaved towards them when they expressed their complaints. This had led to a lack of trust between residents and the Council. This is therefore relevant to the consultation and outlines the necessity for the Council to pay due regard to the Public Sector Equality Duties detailed in paragraph 12.1.

12.3 There is little data on the protected characteristics of the residents at the location held by the service. It is essential that data is collected in future to ensure due regard to the Public Sector duties.

12.4 The Council has undertaken a series of actions since March 2021 to address the concerns of residents and try to start to re-build trust and relationships with residents on the estate. Details of the engagement are in both the report and the EQIA.

12.5 During summer 2022, the service has undertaken a small engagement survey and collected data across some protected characteristics. The key findings were that both females and African/African Caribbean. Mixed heritage and other groups were less satisfied with the housing service provided in general. The consultation should take these factors into account and ensure that the service is accessible for residents that do not have English as a first language. Residents with mental health needs, neurodiverse conditions and those who may be less accessible due to employment should also be considered.

12.6 The service will be unable to ascertain the true equality impact of its improvement programme until it is able to understand the thoughts and lived experience of all protected characteristics in the homes that it manages. It will be primarily important to build trust to encourage residents to be comfortable

sharing their data with the Council. It is noted that some responses where residents were more dissatisfied, they had declined to share their protected characteristics. Future engagement should outline the positive intention behind sharing data and the positive outcomes that it may bring to the resident's experience. In view of the historical difficulties at Regina Road, equalities and residents voice should be at the forefront of improvement plans.

12.7 An EQIA is attached to this report at Appendix 6 which will be updated periodically when data gaps can be filled. It is also imperative that work continues in relation to the action plan outlined in the EQIA.

12.8 Approved by: Denise McCausland Equalities Programme

13. ENVIRONMENTAL IMPACT

13.1 Refurbishment or demolition of the ageing tower blocks and rebuilding in a way that includes neighbouring older housing in a sensitive way that includes green space would have a positive impact on the local environment.

13.2 Approved by Susmita Sen, Corporate Director Housing

14. CRIME AND DISORDER REDUCTION IMPACT

14.1 There is some minor-level anti-social behaviour on the estate, as reported by residents. Any modern well-planned refurbishment or redevelopment should reduce the incidence of such behaviour. By working with the specialist Police Design Out Crime officers we can look to build modern crime prevention techniques and designs into the state which will help prevent crime and ASB.

14.2 There are no crime prevention and reduction implications because of the recommendations in this report.

14.3 Approved by Kristian Aspinall, Director of Community Safety.

15. DATA PROTECTION IMPLICATIONS

15.1 The report contains no sensitive or personal data.

15.2 The recommendations will involve the processing of personal data or special category data. There will be the need to complete a Data Protection Impact Assessment for review by the Data Protection Officer in relation to the data to be collected.

15.3 Approved by Susmita Sen, Corporate Director of Housing

CONTACT OFFICER: Robin Smith, Housing Projects Adviser *telephone number* 0208 726 6000 ext 26081

APPENDICES TO THIS REPORT:

Appendix 1 – Proposed LB Croydon Arrangements for Statutory Consultation under Sections 105 of the Housing Acts 1985 and 107 of the Housing Act 1996

Appendix 2 - Plan No.1 showing location of the three tower blocks and surrounding medium and low-rise development within a boundary

Appendix 3 - Record detailing what residents of the Regina Road area (as defined within the boundary shown on Plan No. 1 in Appendix 2) have said to the Council at the resident engagement sessions held locally during October

Appendix 4 – Draft Tenant Offer for consultation

Appendix 5 – Draft Leaseholder/Freeholder Offer for consultation

Appendix 6 - EQIA

BACKGROUND DOCUMENTS – LOCAL GOVERNMENT ACT 1972

None other than referred to in this report. Documents from Councils A, B and C contain exempt and confidential information relevant to the Council concerned.

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LONDON BOROUGH OF CROYDON
STATEMENT OF ARRANGMENTS FOR CONSULTATION PURSUANT TO
SECTION 105 HOUSING ACT 1985 AND SECTION 137 HOUSING ACT
1996

Section 105 of the Housing Act 1985 sets out the legal obligations of a Local Housing Authority for consulting with secure tenants on “matters of housing management”. There are similar obligations under Section 137 of the Housing Act 1996 for consulting with Introductory Tenants. Secure tenants include flexible and demoted tenants for this purpose.

The obligation applies where any of the Council’s secure or introductory tenants are likely to be substantially affected by a matter of housing management, including any changes to the management, maintenance, improvement, or demolition of properties let by the Council or the provision of services in connection with those properties. This obligation is where in the opinion of the council it represents a new programme of maintenance, improvement or demolition, or there is a change in the practice or policy of the authority and the secure or introductory tenants are likely to be substantially affected as a whole or a group of them.

These Arrangements are published in accordance with Section 105(5) of the 1985 Act and Section 137 (6) of the 1996 Act and it sets out how the Council will enable the secure and introductory tenants to be informed of the Council’s proposals and how the tenants can make their views known to the Council within a specified period.

A copy of these arrangements is available on the Council webpage and also can be inspected at LB Croydon, Bernard Weatherill House, xxxxxxxxxxxxxxxx between 9.00am and 4.00pm Monday to Friday. If you have any questions about any consultation undertaken pursuant to these arrangements please contact xxxxxx on telephone number xxxxxxxxxxxx or by email xxxxxxxxxxxx@[croydon.gov.uk](mailto:xxxxxxxxxx@croydon.gov.uk)

How tenants will be informed:

LB Croydon is committed to ensuring all consultations are effective, adequate, accessible and are open and transparent. In all consultations the Council will take into account all representations made within the consultation before any final decisions are made on the proposals.

Sufficient information will be made available to all tenants which will outline the issues, proposals and various options being considered. Where relevant this will include financial implications of the proposals. A questionnaire/feedback form will be made available that can be completed. An Equalities Assessment will be prepared for all proposals going to consultation.

By providing a dedicated webpage on the Council’s website for each consultation this will include the feedback form that can be completed online.

There may be a series of drop-in sessions (which will vary in frequency, venue and size depending on the individual proposals).

Minimum Consultation period: 6 weeks from the beginning of the consultation period

How to comment

We will ensure affected tenants can comment on our proposals, or obtain further information, by providing the following means to do so:

- A feedback form;
- An email address;
- A postal address;
- A telephone number; and
- The date by which secure tenants must make their views known to us.

Before making a final decision on any housing management matters that require consultation we will consider all representations made in accordance with these arrangements.

If you have any questions or queries, please contact [\[Insert contact details\]](#).

Appendix 2 - Plan number 1. Showing location of 3 tower blocks and surrounding medium and low rise development within a boundary



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APPENDIX 3

Regina Road Estate

Summary - Listening meetings with residents

Three listening meetings were held on 7, 13 & 17 October 2022, with Regina Road residents, including those of homes within the area of Plan No.1. These meetings aligned with the objectives listed in the Residents' Charter agreed by the council in June.

The meetings were held at varying times of the day to maximise turnout and staff door-knocked and hand-delivered the meeting invitation with the latest bulletin. Attendance across the three events included 37 residents, along with housing improvement board members (an independent body), tenant panel representatives and ward councillors (who were there to observe). A surgery for any personal concerns was held before and after each session.

Residents were introduced to Susmita Sen (Corporate Director, Housing), Robin Smith (Housing Projects Adviser & Regina Road Project Lead), Lara Ashley (Executive Culture and Change Advisor), and other council officers present. The purpose of the meeting was outlined:

- To share with residents what has been done so far
- To share what has been discovered
- To discuss what this might mean – now, and options for the future of the estate
- To answer questions and listen to residents' views and thoughts about the future of Regina Road and similar estates and what they value
- To discuss next steps.

Residents were asked a series of questions - the responses and outcome of these are summarised below:

Regina Road workshop We'd like to know what is important to you as we talk about the options for Regina Road.	
1. What do you like about living at Regina Road? (e.g., inside your home, facilities, neighbourhood)	2. What do you dislike about living at Regina Road? (e.g., inside your home, facilities, neighbourhood)
<ul style="list-style-type: none"> • Community - Close knit neighbours, family • Good transport links – buses and trains • Close to a variety of shops and other amenities • Close to schools (primary & secondary) • Green space, close to several parks, recreation, lovely views • Feel safe • History – grown up there/only home • Free parking/parking space • Solid walls • Close to family • Neighbourhood • Families that live here • Close to work • Local shops 	<ul style="list-style-type: none"> • ASB • Not safe/ worries about bullies • Vandalism • Litter/rubbish/fly tipping • Poor rubbish collection & grounds maintenance (weeds and grass cutting particularly) • Mould/damp/silverfish • Rats & mice • Reputation/notoriety • Leaseholder – feel trapped as unable to sell/bad press/exorbitant service charges. • Cladding – unable to secure a mortgage as this is unsafe • Continuous mould • Water pipes make noise • Parking • Flats too small • Smell of sewage • Low water pressure • Windows just flick open • Risk with windows • Lifts often broken • Rubbish chutes too small • Unkempt building • Needs to be more homely • Needs storage

3. What are your initial thoughts about refurbishing or rebuilding homes on the Regina Road estate?

What information do you need to make a decision about:

- **Either option**
- **Refurb**
- **Re-build**

Either option:

- What will happen to each category of person -- what will the offer be?
- Where do they go for either option?
- Clarity on how buildings will be prioritised and what issues will be prioritised
- Moving offsite – Room sizes need to be maintained
- Clarity on duration of such a move
- Clarity on locations/Croydon? proximity to home/school/work
- Freeholders – difficult to sell property given quality of road.
- Worried that a move will be into a rougher area. Want somewhere safe
- Will there be compensation for inconvenience?
- What are the benefits for leaseholders?
- What will happen to the space behind 89-123?
- Will you look at the whole environment?
- Improved communication/listen! This is an emotional time for everyone – this is home.
- Fear of older people won't live to see changes – 10 years is a long time
- Opportunity for deposits to move (previous council scheme mentioned)
- Whatever we do will be better
- Moving out to a different home will be costly (increased rents may be unaffordable)
- Whichever options residents will have to move
- I've looked after my home, new carpets and decorated – will new home/move be the same. Can't afford to start over.
- What are your plans for the low-rise – I'm a leaseholder
- Will repairs continue?
- Ensure parking
- Does not want to be forced into sheltered accommodation even though older and husband has disabilities.

Refurb:

- No point, as despite recent work mould has already returned
- Throwing good money after bad
- Limited life span (25 years then back to square one)
- What will happen to us as work happens?
- Will it be same structure and number of bedrooms

Re-build:

- How big will rooms be?
- How long will it take?
- I want to be able to come back – can I?
- What is Leaseholder offer?
- What are the plans for low-rise blocks on RR?
- We need bigger rooms
- Guarantee new homes will be better - new buildings in Croydon similar to LPS make up.
- Who will own/manage these homes – council/or housing association?
- Will these be for sale?
- Will I have a choice as to where I go?
- Can we transfer our right to buy? How would that work?

Additional comments

- A preference for continuing to live in South Norwood, convenient & friendly
- Disappointment with the past housing service
- Why wasn't residents' money (as it is separate) invested in upkeep
- We've been here before (1994 residents were asked whether to refurb or rebuild and nothing came of that)
- Why did it need the press to get attention?
- Why have we allowed overcrowding?
- General support for rebuilding (although some prefer refurbishment)
- Housing need questions
- Some issues about mould
- You have made the decision already, just take it down
- Who will own new buildings/private developer involvement?
- Has seen Robin Smith's profile and seen links/similarities with Woodbury Estate - obvious what he has come to do
- Why is so much money being spent (new heating, etc) if you intend to tear it down?
- What about other blocks in the borough?
- We've only quoted the ones who want to tear down the place
- Can't wait – just wants to move
- Leaseholders from Regina Road and Sunny Bank feel like they have been left out. Don't know if they can sell their homes
- Having to pay for service charges even though they are not getting a full service. Having to pay each time communal door get damaged even though they have reported ASB
- Regular fly-tipping and dustbins not cleaned or being picked up
- Tenancy officer does not deal with leaseholders.

APPENDIX 4

Draft Secure Tenant Offer (“Offer”)– Regina Road – Consultation purposes

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1. INTRODUCTION

1.1 CONTEXT

This draft offer has been prepared for consultation purposes. Following the outcome of the consultation, the responses will be reported to Members for decision on the final resident offer which will be updated to have regard to the outcome of the consultation.

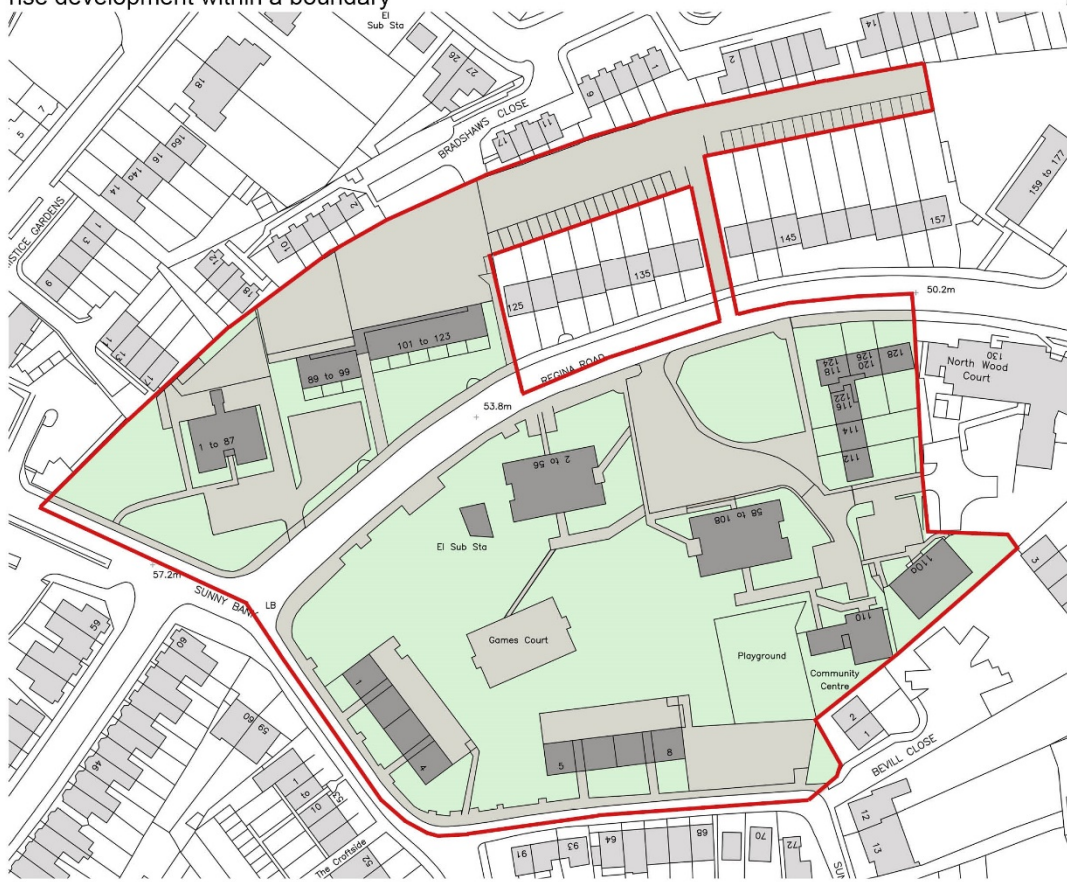
This draft offer sets out the Council's proposed approach to secure tenants who currently occupy the area identified as outlined in the plan below plan at Regina Road Estate. This draft offer provides for different offer options dependent upon whether the block in which the resident lives is to be demolished and redeveloped or its defects remedied via refurbishment.

The terms "regeneration" and "regeneration scheme" used within the offer refers to both the option of refurbishment and the option of demolition and redevelopment.

Draft Secure Tenant Offer has the following objectives:

- Ensure the delivery of the refurbishment or development proceeds on time by facilitating the moves of affected tenants from the estate into alternative suitable homes
- Fairly manage the rehousing and payment compensation process
- Use the refurbishment or development opportunity to improve housing conditions in the Regina Road Estate
- Create a sustainable community in the Regina Road Estate area

Appendix 2 - Plan number 1. Showing location of 3 tower blocks and surrounding medium and low rise development within a boundary



1.2 DEFINITIONS AND ELIGIBILITY

The Offer applies to the temporary and/or permanent rehousing of all Council tenants who are affected by the Refurbishment or Rebuilding at Regina Road (“the Regeneration Scheme”) in respect of the below site plan for the Regina Road Estate.

Residents in Temporary Accommodation within the Regina Road site plan will continue to bid for a permanent home or be offered accommodation in the private rented sector. There will be one suitable offer made. The Council will consider giving those in temporary accommodation a higher priority to move.

DURATION

The Offer will cease to apply upon adoption of a final or revised Offer or until everyone who is entitled to exercise a right to return under this offer has exercised that right as provided for in this offer. The Council’s main Allocation Scheme will continue to apply throughout and thereafter to all Council tenants.

COUNCIL TENANTS

For the purposes of the Offer, Council tenants are secure tenants who rent a home from the Council, including those who live in sheltered housing, as defined by the 1985 Housing Act

HOUSEHOLD MEMBERS

Subject to the exclusions below, all household members will be considered as part of the eligible tenant’s household for rehousing purposes.

This includes:

- Secure and joint tenants of the council
- Co-habiting partners and spouses living together in a settled relationship with the eligible tenant for a continuous period of 12 months before being considered as part of the household.
- Non-dependent children living continuously as part of the settled household since the start of tenancy or who have lived with the household since birth.
- Children born since the start of the tenancy or other dependent children where the eligible tenant has principal care of the child on a permanent basis. Birth certificates will need to be produced to confirm relationship and dependency.
- An adult relative who has become a settled member of the household because they are in need of support and cannot live independently. This may be an elderly relative or someone who is disabled. Such persons must have resided with the household for a minimum of 12 continuous months before being considered as

part of the household.

- Live-in carers providing full time care to a member of the household.

The following household members will be excluded from being rehoused:

- Unauthorised occupants including friends, lodgers and sub-tenants living with the Tenant.
- Licensees.
- Other non-secure occupants and persons included on applications for rehousing but who are not considered to be part of the tenant's household.
- Squatters.
- Any household member who has moved in and caused overcrowding.
- Children of the tenant whose main, principal home is elsewhere.
- Any other person deemed ineligible by the Housing Act 1996 and relevant regulations thereunder.

The Council will consider any exceptions not covered by the criteria above on a case by-case basis. Any exceptions will be subject to approval by the Corporate Director of Housing.

If the composition of any household changes or is expected to change (i.e. pregnancy) the main tenant is required to inform the Council as soon as reasonably possible. Evidence will be required to support any change to a household's composition. The Council reserves the right to refuse the addition of a household member or members if it considers, in its absolute discretion, the evidence submitted is considered insufficient

2 RE-HOUSING OPTIONS FOR COUNCIL TENANTS

2.1.1 The Council will rehouse any Council tenant being displaced from their home as a result of the Regeneration Scheme, with the following exceptions:

- The Council will not rehouse any tenant against whom an outright possession order has been made by a Court for breach of their tenancy conditions for example, due to rent arrears or anti-social behaviour.
- Tenants who have rent arrears will not be eligible to move into a new build property on any redeveloped site at Regina Road unless they have maintained payments of current rent plus their agreed arrears repayment plan for a continuous period of six months.

2.1.2 Tenants have a right to request a review undertaken by an Appeals & Reviews Officer against a decision not to rehouse.

The rehousing options available to Council tenants are set out below:

OPTION 1 – MOVE TO AN EXISTING COUNCIL PROPERTY ELSEWHERE IN THE BOROUGH.

O1.1. Council tenants who wish to move to an existing council property elsewhere in the borough will be given the opportunity to do so.

O1.2. Tenants will be entitled to **one** direct offer of alternative accommodation.

O1.3. For tenants who would like to move outside of London, the Council will identify suitable vacancies including through the Homefinder UK

OPTION 2 – MOVE TO AN EXISTING HOUSING ASSOCIATION PROPERTY ELSEWHERE IN THE BOROUGH.

O2.1. Council tenants who wish to move to a property owned and managed by a Housing Association elsewhere in the borough will be given the opportunity to do so.

O2.2. Tenants will be entitled to one direct offer of alternative accommodation.

O2.3. Tenants who choose this option will be supported by the Regeneration Housing Officer to ensure they understand the differences between the Council and Housing Association tenancies and can afford the rent.

OPTION 3 – MOVE TO A SHELTERED HOUSING OR EXTRA-CARE SCHEME PROPERTY ELSEWHERE IN THE BOROUGH (SUBJECT TO ELIGIBILITY FOR THE PARTICULAR SCHEME)

O3.1. Council tenants who are eligible and wish to move to a property in either a Sheltered or an Extra Care housing scheme elsewhere in the borough will be given the opportunity to do so.

O3.2. Dedicated scheme officers will also provide residents with on-site support including for the viewing and moving processes.

O3.3. Tenants who meet the following criteria will be eligible for offers in a sheltered scheme:

- 55 years and over; or
- Aged 55 to 59 years and in receipt of Personal Independence payments; and
- Single or joint applicants with no children; and
- In need of the housing support provided by the scheme.

O3.4. Tenants will be nominated for consideration by a Panel for Extra Care accommodation. Extra Care housing is for people who require a high-level support due to:

- Frailty;
- Ill-health; or
- Restricted mobility.

O3.5. Tenants will be entitled to two direct offers of alternative accommodation.

OPTION 4 – PURCHASE OF AN AFFORDABLE HOME ELSEWHERE THROUGH A LOW-COST HOME OWNERSHIP SCHEME

O4.1. Council tenants who are working and have savings will be supported in the process to purchase an affordable home.

O4.2. A number of affordable homes are being built in the borough under Shared Ownership and Shared Equity schemes and tenants can also be supported to purchase such properties, as well as properties on the open market.

O4.3. Officers will be able to provide housing advice on whether this is an affordable and viable option based on individual financial circumstances.

OPTION 5 – RENT A PROPERTY ELSEWHERE WITH A PRIVATE LANDLORD

O5.1. The Council can help tenants to move to a property in the private rented sector. This may be a good option for a tenant who would like to move near a support network in another borough or outside London.

O5.2. The Council can provide assistance about affordable private rented accommodation by liaising with landlords in or outside of the borough as well as offering financial assistance towards the required deposit and first month's rent.

OPTION 6 – MOVE TO A NEW PROPERTY IN ANY NEW DEVELOPMENT ON THE ESTATE ONCE COMPLETED

O6.1. If redevelopment is how the project progresses (rather than refurbishment), the Council is proposing to build new council housing across the site as part of the Project. Priority for the new build homes will be given to those who have had to move because of the regeneration scheme. If redevelopment is the option proceeded with, tenants who express an interest in moving back to one of the new homes within the redevelopment area once the properties are built will be given the opportunity to do so.

O6.2. This option will apply to tenants who have initially:

- moved to a council or housing association property elsewhere within the borough on a temporary basis
- moved to a sheltered housing property elsewhere in the borough on a temporary basis

O6.3. Tenants who have rent arrears will not be eligible to move into a new-build property in the redeveloped estate unless they have maintained payments of current rent plus their agreed arrears repayment plan for a continuous period of six months.

2.2 ALLOCATION & ELIGIBILITY PRINCIPLES AND PROCEDURES

- Officers will carry out one to one meetings with Council tenants to help with completing the relevant 1-2-1 & Decant Assessment Forms and establish the needs of the household including whether or not they would like to register an interest to return to a new build property in the redeveloped area if redevelopment is the option progressed and when they are become available.
- As part of this process, the following information will be gathered:
 - Proof of tenancy
 - Housing composition (verifying who lives at the home and that all household members are eligible for rehousing)
 - Rehousing option preference
 - Bed size requirement
 - Type of property preferences (floor level, block type and house type)
 - Location of property preferences (area preference in Croydon or out of borough)
 - Preference to be near to friends, family, current neighbours (as a group move) or support service
 - Any medical, health, mobility, social or risk factors that should be considered
 - Current location of children's schools and workplace
 - Preference of when they would like to move (i.e. as soon as possible, within a specific time frame)
 - Equalities information for monitoring purposes
- The information (excluding equalities information) will also be shared with any development partner for the project in accordance with the relevant privacy notice provided to residents, helping them to understand what existing tenant's accommodation needs are for the provision.
- The tenant will be notified of the outcome of the application following assessment of their eligibility and needs. This notification will:
 - Confirm the Housing Needs Band that the tenant has been placed in. (The Current Allocation Scheme provides that tenants will be placed in Band 1 if it is necessary for the Council to decant them due to refurbishment or redevelopment works such as are currently proposed)

- Confirm the size (and if applicable, the type) of property the tenant is eligible for
- Confirm the tenant's effective date. (The effective date will be based on the date their first Council tenancy commenced).
- Include a reminder about informing the Council of any change in the household's circumstances
- Provide details of the Review process
- The tenant will be awarded the Highest Priority Band (i.e. Band 1) based on the requirement for them to move as a 'decant' for regeneration purpose. The effective date will be based on the date their first Council tenancy commenced.

2.3 IDENTIFYING AND MAKING AN OFFER OF ACCOMMODATION

- Tenants will be entitled to a maximum of one direct offer (those eligible for either a Sheltered or an Extra Care housing scheme will be entitled to two direct offers) of accommodation.
- The Council will check whether a vacant property is suitable for a tenant on the regeneration decant waiting list.
- Once a suitable property has been identified, the Council will contact the tenant (usually by telephone) to give the details of the property that is being offered and make an arrangement for the tenant to view the property. This will be followed by a formal offer letter.
- The tenant will be asked to view the property within 14 days and then to sign the tenancy agreement. If they do not consider the property is suitable for themselves or their household, they will be asked to complete a form setting out their reasons for refusing the offer. If a tenant fails to view the property, then this will be deemed a refusal of the offer.
- A tenant can ask for a Review by a Reviews Officer of the suitability of the accommodation offered regardless of whether they accept the offer or not. The reasons will be considered as part of the Review and a decision will be made as to whether the offer was reasonable or not.
- If the offer is considered unreasonable, the offer will not count against the tenant. This means that they will still be entitled to one or two further offers (if eligible for either a Sheltered or an Extra Care housing scheme).
- If the offer is considered reasonable, it will count as the offer. If the tenant is eligible for either a Sheltered or an Extra Care housing scheme this will mean that the tenant will be left with one more offer to be made.
- Should the tenant refuse one/both direct offers of suitable accommodation; the Council may start early possession proceedings in order to obtain vacant possession of the property in time for potential demolition.

- Considering the long timescale of the programme and waiting times for rehousing, the Council will check the detail of the needs assessment at the point of making an offer to ensure that there has been no change of circumstances and the offer is suitable.
- The Council will liaise with other council services such as the Occupational Therapy Service, Adult Social Care, Children's Services etc. to ensure the tenant's health and support needs are addressed.

2.4 ESTIMATED WAITING TIME FOR AN OFFER OF ACCOMMODATION

- The timescales of when a tenant may be offered alternative accommodation will depend on:
 - The available supply of accommodation that is suitable to meet their housing needs
 - Offers of accommodation will be prioritised based on the following criteria:
 - A tenant from regeneration site will be matched to a vacant property
 - The housing needs and vulnerabilities of each tenant matched will then be assessed to determine which tenant has priority for the match
 - If there is more than one tenant whose needs are suitable for the vacant property, the offer will be made to the tenant who has been a council tenant the longest (based on the tenancy start date)

2.6 BEDROOM SIZE ENTITLEMENT

The size and type of property that an applicant could have will depend on the size of their household.

When assessing the size of accommodation suitable for your household we will provide either bedsit or one bedroom accommodation for single person households. For other households we will assess as requiring a separate bedroom for:

- Yourself and your spouse or partner
- Each adult in your household aged 21 or older
- Every pair of adolescents in your household of the same sex aged between 10 and 20
- Every pair of children in your household aged less than 10 years regardless of sex

Tenants needing larger homes – For households who require more than four bedrooms, the Council will work with them to consider alternative housing options on a case-by-case basis as there is limited supply of larger council-owned

accommodation. For example, the household might wish to consider separate housing for adult children. Such housing situations will be subject to approved by the Corporate Director of Housing

Downsizing – If a tenant chooses to move into a smaller property that meets their housing needs as part of the Regeneration Scheme, they may, subject to budget availability, be entitled to a downsizing payment for any subsequent room returned to the Housing Service

3 RIGHT TO RETURN AND REVIEW

3.1 Right to Return

3.1.1 Previous tenants of Regina Road will retain the Right to Return until one or more of the following has occurred:

- The tenant has informed the Council that they do not wish to return to their original home.
- The tenant has received an offer to return to their original home. This offer will be made regardless of their Housing Need.
- The tenant has received an offer of a suitable alternative property on the Regina Road Estate. This offer will be made on the basis of their Housing Need at the time of the offer regardless of the size of their temporary original home.
- The tenant's tenancy at their temporary home has been ended.

3.2 Right of review

3.2.1 Tenants have a right to request a review undertaken by a Reviews Officer against a decision under this offer. Details of the review process will be provided to Tenants and this draft offer will be updated to include the process before it is finalised.

4 PAYMENTS MADE TO TENANTS

4.1.1 This draft offer is specifically for Regina Road Estate residents impacted by decisions to refurbish or demolish and redevelop at the Estate.

4.1.2 Payments potentially available to secure tenants will be:

- Disturbance Payments
- Home Loss payments

Disturbance Payments – payments to tenants to cover the costs of moving home.

Home Loss Payments – payments to tenants to compensate them for the permanent loss of their home: – a flat rate payment determined by statute, currently £7,800

4.2 Disturbance Payments

4.2.1 Moving home can be costly and the Council is seeking to make sure that tenants do not incur any reasonable additional costs because of the move.

4.2.2 Examples of costs which *might* be considered reasonable include such matters as removal costs, telephone and internet disconnection and reconnection.

4.2.3 Secure Tenants could potentially also claim the following costs:

- Home improvements that have been notified and approved by the Council, less the cost of depreciation. Receipts are not required, but the improvement must have been approved by the Council, as improvements carried out without the Council's consent could amount to a breach of tenancy.

- Where the costs of adaptations in the old home were previously met by a tenant, the Council will reimburse the tenant subject to relevant receipts being available.

4.2.4 These payments will be made directly to the tenant and will only be made in respect of one replacement property on any move.

4.2.6 Details will be provided of the payment option/s in due course.

4.3 Home Loss payments to secure tenants

4.3.1 Subject to the tenant qualifying, these payments will be made when a decision is made to demolish a tenant's home. These payments will not be paid if a decision is made to repair the tenant's block, even if the tenant decides not to return to their original home.

4.3.2 Payments will normally be made only after the clearance of and return of the keys to the property the tenant is vacating. Any rent arrears the tenant owes will be deducted from these payments.

5. DRAFT LOCAL LETTINGS PLAN

5.1 Background and Need for Local Lettings Plan

This Draft Local Lettings Plan is made pursuant to the provisions of s.166A(6) Housing Act 1996 (as amended) and/or s.21 Housing Act 1985 and sets out the principles and procedures adopted by the Council for the allocation of housing to Council tenants who will be affected by the Regeneration Scheme

The Draft Secure Tenant Offer for Regina Road offers a Right to Return to all tenants in Regina Road estate who have been required to move due to refurbishment/redevelopment works. To honour this commitment, this draft Local Lettings Plan sets out the priorities for vacant homes on the Regina Road estate.

5.2 Application of the Plan as set out in the areas marked on the map above

5.2.1 This lettings plan will remain in place until there are no remaining tenants with the Right to Return.

This plan does not apply to lets where a property is unavailable due to successions or legal reasons.

This plan does not apply where decisions have been taken not to fill vacancies within Regina Road estate due to upcoming decisions regarding refurbishment or redevelopment and associated works.

5.3 Priority for vacant properties on Regina Road Estate

5.3.1 Each vacant property on the estate will be offered to households in the following order of priority. With the exception of those returning to their original home (priority a), priority will be given to household with the earliest Regina Road tenancy start date.

5.3.2 Where repairs have been completed on properties within Regina Road Estate

- a. The previous tenant of that particular property retains a Right to Return, regardless of their Housing Needs.

5.3.3 Where there remain tenants who need to be rehoused

- b. Tenants from these blocks who are vulnerable
- c. Tenants from these blocks with a local connection
- d. All other tenants from these blocks

5.3.4 Where a decision is made to demolish blocks at Regina Road Estate

- e. Tenants retaining a Right to Return and who have a Housing Need for this size property, with priority to those with the earliest Regina Road tenancy start date.
- f. Households as determined by the Allocations Scheme

5.4 Definitions

5.4.1 Housing Needs and suitability of properties will be determined by the Allocations Scheme in force at the time.

5.4.2 Tenants will have the right to appeal if they believe that the property is not suitable unless they are the original tenant of that property.

5.4.3 The start date for those who succeeded to their tenancy will be the start date of the original tenancy so long as the tenancy was also in the same property.

5.4.4 Previous tenants will retain the Right to Remain until one or more of the following has occurred:

- The tenant has informed the Council that they do not wish to return to their original home.
- The tenant has received an offer to return to their original home. This offer will be made regardless of their Housing Need.

- The tenant has received an offer of a suitable alternative property on the Regina Road Estate. This offer will be made on the basis of their Housing Need at the time of the offer regardless of the size of their temporary original home.
- The tenant's tenancy at their temporary home has been ended.

5.4.5 Vulnerable tenants are tenants (or members of their household) who are vulnerable, at high risk to themselves or the property, or who have specialist needs such as mobility requirements.

5.4.6 Local connection is taken to mean where a tenant or member of their household is attending a local school or have support services only available in the local area ("local" and "locally" meaning within the marked areas in the map above), or those who are working locally.

5.4.6 Tenants who need to be rehoused are those who need to move prior to any repair works or demolition and living in the Regina Road Estate.

5.5 Discretion

5.5.1 This plan cannot cover every eventuality and the Council reserves the right to make offers outside of this letting plan in exceptional circumstances and authorises the Corporate Director of Housing to do so.

DRAFT

APPENDIX 5

Draft Leaseholder and Freeholder Offer for Regina Road for Consultation

1. Introduction

The options available to leaseholders and freeholders on LB Croydon Estates

This draft offer draft offers designed for leaseholders and freeholders who own a property on the Regina Road Estate which is affected by the need to refurbish or demolish and redevelop at the site.

This is a special status which has been given to an estate because it has specifically been identified as needing refurbishment or redevelopment due to its current poor condition, which falls below the Government's Decent Homes Standard.

In the event that, following statutory consultation, the decision is taken to demolish and redevelop on the site of the Regina Road Estate, Croydon Council will need to purchase your property before any redevelopment can proceed. This draft offer draft offer sets out the financial compensation and general assistance you will receive from the Council if your property is identified for demolition. This draft offer also outlines the Council's overall proposed approach to acquiring your property and the options available to assist you to find a new home.

We understand that having to sell your home to the Council can be an unsettling experience. We hope that the information set out here will reassure you about the process and the options available to you. Whatever your preferred option is, we aim to make the purchase of your home and your move from it easy and stress-free as possible.

Based on the experience of leaseholders and freeholders where the Estate Regeneration Programme has already started, as well as feedback from local residents, the Council has sought to improve the options available to affected leaseholders and freeholders so that any future proposed development in the local area maximises the benefits to local people.

No party (either the Council or any leaseholder) is financially better or worse off as a result and leaseholders should not be financially disadvantaged by the regeneration.

We know that the draft offer cannot cover every eventuality, and provision needs to be made to ensure there is sufficient flexibility to address the personal circumstances of affected leaseholders. The principles set out in this draft document therefore set out the general approach. Where cases fall outside the draft offer, the Corporate Director of Housing will consider leaseholders' and freeholders' individual circumstances on a case-by-case basis based on the principles set out in this document.

2. Who does the draft offer apply to?

This draft offer applies to all resident and non-resident leaseholders or freeholders on the Regina Road Estate who are going to be affected by proposals to refurbish or demolish and redevelop at the Estate.

For the purposes of this draft offer a resident leaseholder or freeholder (hereafter referred to as resident leaseholders) is one that has been in occupation of the property as their only or main home for at least one year preceding the date of the Notification Letter from the Council setting out its intention to acquire the property. A non-resident leaseholder is one that does not meet this criteria.

The entitlement for non-resident leaseholders or freeholders (hereafter referred to as non-resident leaseholders) differs slightly from resident leaseholders and is set out in section 5.

If your property is earmarked for a later phase of a regeneration scheme and you wish to sell your property, for whatever reason, the Council will consider purchasing your home at an earlier stage. This is referred to as an Early Buyback.

3. When will my home be purchased?

In the event that a decision is taken to demolish and redevelop on the Regina Road Estate, and this will impact on your property, the Council will share timescales for the redevelopment at the earliest opportunity in order to help you plan. Redevelopment of larger estates is often organised on a phased basis. This means that properties are redeveloped in accordance with a programme, which is agreed (wherever possible) at the beginning of the scheme. This will be fully explained to leaseholders and freeholders during the consultation process.

Whilst the Council will endeavour to adhere to the agreed programme, please note that multi-phase developments planned over many years will almost inevitably encounter unforeseen events that can either delay or require changes to the original programme or lead to a re-ordering of phases. The Council will communicate any material change to the programme, if necessary, as soon as possible.

4. The purchasing process

This section outlines the Council's overall approach to purchasing your property and the options available for both resident and non-resident leaseholders. This is subject to the outcome of statutory consultation which will indicate whether refurbishment or demolition and redevelopment is the most appropriate option for the Regina Road Estate.

4.1 Consultation

Notification Letter

At the start of the redevelopment process (or relevant redevelopment phase for larger projects) that affects your home, officers from the Council will seek the necessary approvals to commence the purchasing of leaseholders' or freeholders' properties. Once these approvals are in place leaseholders or freeholders will be sent a Notification Letter. This will set out the Council's intention to purchase your property and will invite you to an initial meeting.

Meeting

At this initial meeting the redevelopment proposals will be shared with all leaseholders and freeholders. Council officers will explain how leaseholders and freeholders will be affected and will explain the purchase process, the options available to leaseholders and freeholders, and the assistance and support that can be provided for the Regina Road Estate.

One-to-one meeting

Each leaseholder and freeholder will be invited to an individual meeting with a Council officer from the Regeneration Team to discuss your case and to answer any questions that you may have about the process.

The aim of the meeting is to provide clear information about what you can expect from the purchase process and to discuss the options available to you. The Council is committed to ensuring that all residents are treated fairly and equally, have confidence in the process, and receive a high level of service.

At this point you should advise the Council officer whether you are a resident or non-resident leaseholder. If you are a non-resident leaseholder, it is important to note that the Council is under no formal obligation to rehouse either your tenant or any other occupant in the property, and the purchase will only be concluded with vacant possession of the premises provided by you. Further information about the entitlements for non-resident leaseholders is detailed in section 5.

The Council understands that the purchase process can be a difficult time, so you are free to request further meetings with the Council officer to discuss any queries or issues you may have. Where possible and reasonable, the Council officer will make themselves available for meetings outside of normal working hours.

4.2 Valuing

After the consultation stage a surveyor acting for the Council will arrange to visit you and carry out a valuation of your home. Following this visit, the surveyor will send you a written offer for your home. This will be the market value of your property.

The surveyor considers the following matters in assessing the market value of your property:

- The internal condition

- The location of the property and amenities within the area such as transport links, shops, and services
- The housing market in the immediate area, including recent completed sales prices of similar ex-local authority properties in areas nearby of a similar age and condition
- Anything else that in the reasonable opinion of the valuer has a material impact on the value of the property

Please note that valuations are not based on website estimates or estate agent asking prices, but instead on actual completed sales recorded at the Land Registry and the professional assessment of the Council's surveyor, as above.

The written offer will also include details of the compensation to which you are entitled. Please see Section 5 for further information regarding compensation. The valuation is valid for a three-month period from the date of the valuation letter, although this period can be extended with the agreement of both parties.

Market value

The definition of market value, as prescribed by the Royal Institute of Chartered Surveyors, is, in short, the price at which the property would change hands between a willing buyer and a willing seller. This means an assumption that neither the buyer nor the seller are under any compulsion to buy or to sell, and both have a reasonable knowledge of the relevant facts. The Council's offer will be at the market value.

What should I do if I disagree with the Council's valuation?

If you disagree with the Council's valuation of your home, you are encouraged to obtain your own valuation completed by an independent chartered surveyor. If you decide to obtain your own valuation, there will be costs attached. The Council will pay a reasonable amount to cover these costs. The surveyor you choose should be completely independent of the Council and must be a member of the Royal Institution of Chartered Surveyors (RICS).

More information about appointing a surveyor can be found on the RICS website (www.rics.org), by contacting them on **024 7686 8555**, or by email at contactrics@rics.org

Expert Determination

After a period of negotiation, if the valuations of the Council's surveyor and your surveyor differ and there is no prospect of the two surveyors reaching agreement, then with your written agreement the Council may choose to make an application to the RICS for an independent expert to carry out a determination of market value.

Whilst the RICS will determine the identity of the expert, the Council will agree the form of application to the Dispute Resolution Service with you, and there will be the opportunity to tell the RICS if there are any firms that we know to be conflicted. If the Council seeks to pursue this option, you will be asked to speak to your surveyor to confirm that they would be happy to participate in the Expert Determination as they

may need to undertake some additional work to assist the process. The Council will reimburse their additional reasonable and proper costs in relation to this. The outcome of the Expert Determination is not legally binding.

Where necessary, this process will be followed in respect of valuations for existing properties. In relation to existing properties if a higher value than its current offer is determined as a result of the Expert Determination, the Council commits to pay the higher amount. If a lower value is determined, the Council will honour its existing higher offer.

4.3 Compulsory Purchase

If agreement is not reached either through negotiation or by the Expert Determination process, then the Council will seek to proceed with the purchase of your home through use of a Compulsory Purchase Order (CPO). This will be a last resort for the Council as our preference is always to reach an agreement with you through negotiation wherever possible.

Due to the amount of time a CPO takes to put in place and the importance of the refurbishment or redevelopment of the Regina Road r estate proceeding the Council will start preparing for a CPO once the consultation phase has commenced. This will be explained to you during the consultation phase. If we are unable to agree a price for your property by the time the Council needs possession of your home, we will write to you about using our powers of compulsory purchase to take possession of your property. In this scenario, and where the Council has implemented a CPO, either party is able to apply to the Upper Tribunal (Lands Chamber) to determine compensation. This is an independent judicial body set up by the Government to resolve disputes concerning property issues.

The tribunal has the powers of a court of law equivalent to the High Court but is intended to be a more informal, less expensive, and faster route to resolving property disputes. If an appeal is necessary on a point of law, then the decision lies with the Court of Appeal. Cases are usually heard by a single member, but in certain circumstances they may be heard by two or even three members. The decision of the Upper Tribunal (Lands Chamber) and, if necessary, the Court of Appeal is final. The value agreed by the Tribunal is the value you will receive for your home, with no further negotiation or right of appeal, and this could be higher or lower than the Council's offer.

Leaseholders and freeholders should be aware that the Upper Tribunal (Lands Chamber) determines who should pay the costs of the tribunal. This cost can be charged to you personally in some cases. You are strongly advised to seek legal advice in this respect.

In circumstances where a CPO is implemented, you are entitled under the law to request an advance payment of compensation. We recommend that you seek legal advice regarding this process if necessary.

The level of advance payment will be 90% of the Council's estimate of the market value of your property. Please note that if a property is mortgaged the Council is required to retain sufficient funds to discharge that mortgage and cannot make an advance payment if the mortgage(s) are 90% or more of the Council's valuation.

We will also seek to make you a proportional Home Loss or Basic Loss payment at the same time as your advance compensation is paid, if you are entitled to this.

5. Entitlement to compensation

As it is the Council that wants to buy your property, it is important that you are reimbursed for any relevant and reasonable costs that you incur as a result. This section details what you as a leaseholder or freeholder are entitled to from the Council in terms of compensation. The type of compensation you are entitled to depends on your circumstances and whether you are a resident or non-resident leaseholder. There are different types of compensation you may be entitled to, and it is therefore recommended that you seek legal advice.

5.1 Compensation for resident leaseholders

Home Loss Payment

A Home Loss Payment is an additional sum of money that you are legally entitled to if you are being compelled to leave your home in certain circumstances, such as a result of a regeneration scheme. This payment is in addition to the payment of the market value for your home. It is designed to compensate you for the inconvenience, stress and upset caused by the move.

You are entitled to 10% of the market value of your home, with a minimum payment and maximum payment. These payments levels were last set in July 2022 and, as they are set by Government, may change from time to time.

You will also be required to provide sufficient proof that you have owned and lived in the property for at least a year in the form of bank or mortgage statements, council tax statements, utility bills etc. The Council may carry out other checks to ensure that those who claim to be resident leaseholders actually are.

The Home Loss Payment is paid when the Council completes the purchase of your home (or you will receive a proportional Home Loss Payment at the same time that the Council makes an advance payment of your compensation, if that is what you have requested – see Section 4.3 above).

Disturbance Payment

A Disturbance Payment is additional compensation that you may be entitled to, which is designed to compensate you for certain costs that you may incur as a result of having to move home.

Some of the items that may be claimed are listed below, although this is not an exhaustive list:

- Removal costs
- Special adaptations to the replacement premises, e.g. for those with disabilities
- Altering soft furnishings and moveable fittings and fixtures to fit your new home
- Disconnection and reconnection of services (gas, electricity, telephone etc.)
- Redirecting mail (for one year only)
- Carpet alterations
- Curtain alterations
- Disconnection and reconnection of appliances (e.g. washing machines, cookers)

It is important that you keep a detailed record of the costs incurred in connection with the move. In order for the Council to reimburse you for these reasonable costs, you are required to provide the Council with receipts for all reasonable costs. It is important to get a receipt or pro-forma invoice from the companies that you use to carry out any works or services that you wish to seek reimbursement for.

In order to claim costs owed to you, you must use reputable companies that will provide genuine receipts and invoices stating the following information:

- Their VAT Number
- Company headed paper
- Contact details
- Company registration details
- Date
- Invoice number
- Description of services provided
- Invoice total

If any items that you wish to claim for are over £500, the Council will require three quotes from reputable companies to ensure that value for money is achieved. For works or services over £500, the Council will need to approve all payments in advance of the work being commissioned.

If you require help in making upfront payments please contact the Council, who may be able to assist.

Additional costs incurred in selling your home and/or purchasing another property

In addition to Home Loss and Disturbance Payments, you can also claim for reimbursement of legal and/or surveyor's costs you incur that are linked to the sale of your current property and (where relevant) the purchase of your new home and to

the extent that these costs have not already been taken into account as part of other payments. These costs may include, for example:

- Legal (conveyancing) fees arising from the sale of your home to the Council and the purchase of a new property
- Stamp Duty Land Tax (relevant to the value of your existing property)
- Surveyor's fees arising from the acquisition of a replacement property
- Survey fee and costs in connection with the redemption/transfer of an existing mortgage or raising a new one

Once you have found a solicitor and/or a surveyor you will need to obtain a quotation from them and provide a copy of this to the Council for approval. Please make sure that your surveyor and/or solicitor knows that they will only be paid at the end of the process, once the sale has been completed.

You should note that it is your responsibility as leaseholder to prove to the Council that any claims for compensation you make are reasonable and have been incurred directly as a result of the Council acquiring your property. In practice this is likely to involve the provision of proper receipts and the prior agreement of costs where appropriate.

If you are unsure about any payments or invoices you receive from suppliers, we strongly recommend that you speak to the Council before you make any payment or commitment to a company. If you are unsure about any payments or invoices you receive from suppliers, we strongly recommend that you speak to the Council before you make any payment or commitment to a company.

The Council will also reimburse you for any other relevant costs as set out in the relevant Ministry of Housing, Communities and Local Government guidance to the extent that these costs have not already been taken into account as part of other payments.

5.2 Compensation for non-resident leaseholders

Basic Loss Payment

A Basic Loss Payment is an additional sum of money that you may be entitled to if you are being compelled to sell your property in certain circumstances, such as a result of a regeneration scheme. This payment is in addition to the payment of the market value for your property. As a non-resident leaseholder you are entitled to receive 7.5% of the market value of your property, or a maximum payment of £75,000, whichever is the lower. Please note these amounts are set by central government and may change from time to time.

You must have owned the property or been a tenant for at least a year to qualify. You must make a claim for a Basic Loss payment in writing to the Council.

Additional costs incurred in selling your property and/or purchasing another property

In addition to a Basic Loss Payment, you can also claim for reimbursement of legal and/or surveyor's costs you incur that are linked to the sale of your current property and (where relevant) the purchase of a new property and to the extent that these costs have not already been taken into account as part of other payments. These costs may include, for example:

- Legal (conveyancing) fees arising from the sale of your home to the Council and the purchase of a new property
- Stamp Duty (relevant to the value of your existing property – see Appendix 4.5 below)
- Surveyor's fees arising from the acquisition of a replacement property
- Survey fee and costs in connection with the redemption/transfer of an existing mortgage or raising a new one.

Once you have found a solicitor and/or a surveyor you will need to obtain a quotation from them and provide a copy of this to the Council for approval. Please make sure that your surveyor and/or solicitor knows that they will only be paid at the end of the process once the sale has been completed. You should note that it is your responsibility as leaseholder to prove to the Council that any claims for compensation you make are reasonable and have been incurred directly because of the Council acquiring your property.

In practice this is likely to involve the provision of proper receipts and the prior agreement of costs where appropriate.

If you are unsure about any payments or invoices you receive from suppliers or what costs will be met by the Council, we strongly recommend that you speak to the Council before you make any payment or commitment to a company.

The Council will also reimburse you for any other relevant costs as set out in the relevant Ministry of Housing, Communities and Local Government guidance to the extent that these costs have not already been taken into account as part of other payments.

6. Your new home options

6.1 Resident Leaseholders

Many leaseholders will wish to make their own arrangements when they have agreed a valuation for their existing property and simply purchase a new home on the open market without any further involvement from the Council. However, if you are a resident leaseholder the Council can offer you options which are designed to allow you to stay on the estate.

We recognise that each freeholder or leaseholder will be unique in both their choice of where to move and in their personal situation. We can help you explore the option/s that best suit you and provide you with support.

In the first instance the offer of taking up one of the options below and moving to a new home will be offered to in phase leaseholders on the same estate. Once the Council has received notification from all in-phase leaseholders on that estate who wish to take up one of the options for a new home, the Council will make an assessment of whether there are any 'surplus' properties available that can be offered to other leaseholders (please note that in-phase leaseholders will not be allowed to defer their move to a new property in a later phase of the regeneration if suitably sized new homes are available in the current phase). If the Council decides that this is the case then these 'surplus' homes will be offered in accordance with the priority criteria as set out in The Local Lettings Plan

Housing Options

- A) Open market purchase
- B) Shared equity
- C) Shared Ownership

A: Open Market Purchase

This option is the straightforward purchase of your property for the agreed market value. When leaseholders reach agreement with the Council regarding their valuation and compensation payments, they will then make their own arrangements to find a suitable new home.

B: Shared Equity

If the market value of your current property is less than the market value of a new similar sized (by bedrooms) or smaller property and you are unable to afford the difference (as per option B) then the option of shared equity will be offered to you. In order to be eligible for this option you will be required to invest the full market value of your existing property into the purchase of your new home. This will buy a proportion of the equity of the new property.

The Council will retain the remaining unpurchased proportion of the equity of the property. This remaining proportion can be purchased by you at its market value at any future point. No rent is charged on the unpurchased proportion.

Key information for this option includes:

- Your existing property will be valued by the Council in accordance with Section 4.2.
- You will select one of the available new build properties on the estate of a similar size (by bedrooms) or smaller and this will be valued by the Council.
- Any planned maintenance contributions not covered by the service charge will be charged as per the terms and conditions of the lease. You will be responsible for 100% of these costs irrespective of the proportion of equity you own in the new property.

- You will be notified of the estimated annual service charge. You will be responsible for 100% of these costs irrespective of the proportion of equity you own in the new property.
- You will have the normal rights and responsibilities of a full owner-occupier.
- The length of lease will be 125 years.
- You will be able to sub-let the property with written permission from the Council.
- There is no minimum stake that you would need to purchase in order to qualify for shared equity.

However, you are required to invest the full market value of your existing home in order to be eligible for this option.

- The proportion of equity that you own in the new property is recorded on the lease.
- You do not have to pay any rent on the unpurchased proportion of the property.
- You can increase the proportion of equity you own in the new property up to 100% in accordance with the provisions of the lease. This is known as staircasing.
- Provided you have not staircased to 100% ownership of the property, assignment (at nil value) of the property can only occur once, after which the unpurchased proportion of the property must be acquired from the Council at market value.
- If the new owners choose not to acquire the unpurchased proportion at this point then the Council will exercise its right of pre-emption and acquire their proportion of the property from them at market value.
- The single succession to or single assignment (at nil value) of the property can be to whomever the leaseholder chooses.
- Prior to the single assignment (at nil value) of or succession to the property, if you wish to sell the proportion of equity that you own in the new property then the Council will exercise its right of pre-emption.

C: Shared Ownership

Shared ownership is a part-buy, part-rent scheme under which you own a proportion of the property and pay a rent on the unpurchased proportion, which is retained by the Council.

If you choose, for whatever reason, not to invest the full market value of your current property (or the maximum that you can afford to – please see Section 6.3), then you will be offered the shared ownership option. After an initial period, you will have the right to purchase additional proportions of equity in the property up to 100% in accordance with the provisions of the lease. This is known as staircasing. If you increase the proportion of equity you own in the new property, the amount of rent you pay will decrease.

If you purchase 100% of the equity in the new property, then no rent will be payable. Key information for this option includes:

- Your existing property will be valued by the Council in accordance with Section 4.2.
- You will select one of the available new build properties on the estate and this will be valued by the Council.
- You will be notified of the estimated annual service charge. You will be responsible for 100% of these costs irrespective of the proportion of equity you own in the new property.

- Any planned maintenance contributions not covered by the service charge will be charged as per the terms and conditions of the lease. You will be responsible for 100% of these costs irrespective of the proportion of equity you own in the new property
- The length of lease will be 125 years.

You will have the normal rights and responsibilities of a full owner-occupier.

- You will be able to sub-let the property with written permission from the Council.
- The proportion of equity that you own in the new property is recorded on the lease.
- You can increase the proportion of equity you own in the new property up to 100% in accordance with the provisions of the lease. This is known as staircasing.
- Succession to the property can occur an unlimited number of times to whomever the leaseholder chooses.
- Provided you have not staircased to 100% ownership of the property, assignment (at nil value) of the property can only occur once, after which the unpurchased proportion of the property must be acquired from the Council at market value.
- If the new owners choose not to acquire the unpurchased proportion at this point, then the Council will exercise its right of pre-emption and acquire their proportion of the property from them at market value.
- Prior to the single assignment (at nil value) of the property, if you wish to sell the proportion of equity that you own in the new property then the Council will exercise its right of pre-emption.
- For the first year of the shared ownership lease, the rent that you pay will be equivalent to 2.5% of the unpurchased proportion of the property, payable in monthly instalments. This amount will then be adjusted each year in line with the Retail Price Index (RPI) + 0.5%.
- When additional proportions of equity are purchased, the rent is recalculated in the same way, at 2.5% of the new unpurchased proportion, adjusted each year thereafter in line with the Retail Price Index (RPI) + 0.5%.

6.2 Options for Non-Resident Leaseholders

If you do not live in the property you own, the Council will purchase your property for the agreed market value. On completion of the sale of your property to the Council you will need to give the Council vacant possession. If your property is tenanted it is your responsibility to ensure that any tenants have left the premises by the date of completion.

6.3 Options for leaseholders in need of additional support and assistance

It is recognised that some leaseholders may require additional support and assistance in securing a suitable new home. For example, the financial position of the leaseholder may preclude them from being able to satisfy all of the minimum purchase requirements of the various options outlined in section 6.1.

To qualify for additional support, we will ask for supporting documents to be provided to confirm income and expenditure. Where it can be confirmed that a leaseholder is in financial difficulties and qualifies for additional support and assistance, the

following options will be explored and offered through the Corporate Director of Housing.

Shared Equity

The starting point for eligibility for a shared equity offer requires you to invest the full market value of your existing property into the purchase of your new home.

In order to do this, if you are only able to raise some borrowing, but at a level that is less than the mortgage on your existing property, you will be offered shared equity to the level you can afford to purchase based on investing all of the equity you hold in your existing property and the maximum new mortgage you can obtain.

If you are unable to raise any borrowing (e.g. mortgage) at all and cannot otherwise invest the full market value of your existing property, then you will be offered shared equity to the level you can afford to purchase based on investing all of the equity you hold in your existing property.

Shared ownership will be available and offered to leaseholders who choose not to re-invest the full value of their existing home or the maximum amount that they can afford to invest. Therefore, if a leaseholder wants to purchase on a shared equity basis, provided they invest the maximum amount that they can afford to in line with the criteria above, they should be able to purchase on this basis. This will be subject to an independent financial assessment and would require approval by the Corporate Director of Housing. In both options, the leaseholder would be able to staircase, increasing the proportion of the property they own.

6.4 Options for leaseholders assessed as vulnerable and in need of assistance and support

The Council is also aware that there are leaseholders that have complex needs which make them vulnerable. We may be able to provide additional support to those leaseholders with complex needs that are assessed as being vulnerable and assist them with their move.

Criteria for vulnerability assessment

A vulnerable leaseholder for the purpose of this draft offer is someone that is “less able to safeguard his or her personal welfare or the welfare of any children in the household and will be in need of care and attention by reason of age, infirmity, or suffering from chronic illness or mental disorder, or substantially handicapped by being disabled”.

Detailed consultations will be conducted with social services and relevant health practitioners to obtain the necessary information and documentation (e.g. care needs/packages) regarding the needs of the household to assess and determine vulnerability. The assessment will be subject to an independent financial assessment.

If the outcome of the assessment is that the household is vulnerable, the leaseholder must meet all of the following criteria to qualify for extra assistance and support:

- The leaseholder must have been exclusively resident in their property for the previous two years.
- The leaseholder must not own any other leasehold or freehold interests in the UK or abroad; and
- The leaseholder is deemed by the Council to be in financial hardship and as result will not be able to rent or buy in the private sector.

Any request from vulnerable leaseholders for additional assistance not covered by this Options Document will require approval by the Corporate Director of Housing (see Section 6.5).

6.5 Corporate Director of Housing

The Corporate Director of Housing will assess the need for flexibility for leaseholders who wish to make a claim for assistance in respect of one or more of the following:

- Additional financial support or assistance
- Being assessed as vulnerable and in need of assistance and support
- Early Buybacks

To assess a leaseholder's individual circumstances the following information will be requested:

- The option you would like to take
- Your current financial situation, including monthly/annual housing costs
- The amount you can reinvest in your new property
- Any relevant supporting information relating to financial difficulty or vulnerability

A Project Officer will work with you to complete the required forms.

Based on the information provided by the leaseholder, and if required a social services representative, health practitioner or GP, the Project Officer will make a recommendation to the panel, which will then make the decision formally at a meeting. A representative of the Residents Association may be in attendance to present the case at the meeting.

The panel will:

- Assess each case presented to it
- Consider the case in accordance with the criteria set out in this document

The panel will consider each case within four weeks of being provided with recommendations and supporting information. The leaseholder will be notified of the decision of the panel in writing within one week of the meeting.

Equality Analysis Form

1. Introduction

1.1 Purpose of Equality Analysis

The council has an important role in creating a fair society through the services we provide, the people we employ and the money we spend. Equality is integral to everything the council does. We are committed to making Croydon a stronger, fairer borough where no community or individual is held back.

Undertaking an Equality Analysis helps to determine whether a proposed change will have a positive, negative, or no impact on groups that share a protected characteristic. Conclusions drawn from Equality Analyses helps us to better understand the needs of all our communities, enable us to target services and budgets more effectively and also helps us to comply with the Equality Act 2010.

An equality analysis must be completed as early as possible during the planning stages of any proposed change to ensure information gained from the process is incorporated in any decisions made.

In practice, the term '**proposed change**' broadly covers the following:-

- Policies, strategies and plans;
- Projects and programmes;
- Commissioning (including re-commissioning and de-commissioning);
- Service review;
- Budget allocation/analysis;
- Staff restructures (including outsourcing);
- Business transformation programmes;
- Organisational change programmes;
- Processes (for example thresholds, eligibility, entitlements, and access criteria).

2. Proposed change

Directorate	Housing
Title of proposed change	Future of Regina Road
Name of Officer carrying out Equality Analysis	Katherine Monk

2.1 Purpose of proposed change (see 1.1 above for examples of proposed changes)

The Regina Road estate was developed as social housing by the Borough in the mid-1960s. It includes three 11-storey tower blocks built using the Wates Large Panel System (LPS), each with 44 flats. There are four medium-rise blocks close to the tower blocks, with an additional 48 flats, within the wider estate of mainly two-storey housing. There is also some green space, a play area and a kindergarten that should be considered as part of any redevelopment and re-provision.

The flats in the tower blocks – particularly in nos 1-87 - have suffered in recent years from a variety of issues including water penetration, condensation and mould that have proved difficult to rectify. The council is proposing to begin the process of addressing the current unsatisfactory situation at the Regina Road estate where three ageing tower blocks require radical action to ensure modern social housing fit for the 21st Century. In summary, improved living conditions at the blocks would involve either refurbishment or redevelopment, and a report considering the options open to the council is to be presented to Cabinet in September 2022.

It is a legal requirement under Section 105 of the Housing Act and a legal requirement as part of the Building Safety Act 2021 to ‘develop a Resident Engagement Strategy so residents can influence and are involved in decisions regarding building safety, are informed of their rights and of their obligations, have clear reporting arrangements for building safety concerns, and a clear escalation process for all residents’. Since July 2018 the GLA has required any landlord seeking GLA funding for estate regeneration projects which involve the demolition of any social homes (and the construction of 150 or more homes of any tenure) to show that residents have supported their proposals through a ballot. This is to make sure that GLA funding only supports estate regeneration projects if residents have a clear say in plans and support them going ahead.

Subject to Cabinet, next steps include exploring options for the future of the Regina Road estate with all the residents affected.

3. Impact of the proposed change

Important Note: It is necessary to determine how each of the protected groups could be impacted by the proposed change. Who benefits and how (and who, therefore doesn't and why?) Summarise any positive impacts or benefits, any negative impacts and any neutral impacts and the evidence you have taken into account to reach this conclusion. Be aware that there may be positive, negative and neutral impacts within each characteristic.

Where an impact is unknown, state so. If there is insufficient information or evidence to reach a decision you will need to gather appropriate quantitative and qualitative information from a range of sources e.g. Croydon Observatory a useful source of information such as Borough Strategies and Plans, Borough and Ward Profiles, Joint Strategic Health Needs Assessments <http://www.croydonobservatory.org/> Other sources include performance monitoring reports, complaints, survey data, audit reports, inspection reports, national research and feedback gained through engagement with service users, voluntary and community organisations and contractors.

3.1 Deciding whether the potential impact is positive or negative

- **Table 1 – Positive/Negative impact**

Regina Road is home to a wide range of residents, including families, aging residents and a mix of backgrounds, needs and ethnicities. The data we hold about residents living on the estate regarding protected characteristics is not complete and so it is not currently possible to paint an accurate picture of the extent to which residents share a protected characteristic.

The Council has undertaken a series of actions since March 2021 to address the concerns of residents and try to start to re-build trust and relationships with residents on the estate. A team of housing officers spoke to residents at the door to get an understanding of the issues residents were experiencing in their homes. A number of meetings - to which all residents were invited - have taken place and a drop-in has been operational since September 2021. A regular newsletter and bulletin for Regina Road is produced for residents. These contain contact details for key housing officers for Regina Road, ways to get involved, and who to talk to if there are problems. Noticeboards are updated with new information and bulletins as they are published.

A reference group was also formed at the beginning of 2022 consisting of a small group of residents representing all three blocks on the estate. It was created to support and engage with residents about repairs, works and improvements taking place at Regina Road over the short, medium and looking ahead to the future.

A Walkabout was held with residents of the three tower blocks during the evening of Wednesday, 13 July 2022. Main issues raised were repair issues, some dating back several years and related to general whole block fabric/service failures which re-occur. Residents present understood the difficulties associated with blocks nearly 60 years old and said they would appreciate new homes in preference to the continuous process of patching old homes. Some residents said they would be happy to move away from Regina Road. A Walkabout Action Plan has been prepared which follows up on all the issues raised by residents to ensure progress and resolution.

Further meetings are being held with residents to listen to their views, starting with residents of the medium-rise blocks adjacent to nos 1-87.

We do not have any data currently which would tell us whether groups that share a protected characteristic (compared to non-protected groups have a better or worse experience of housing services at Regina Road. We do have some data for a small percentage of our customers following an engagement exercise carried out in Summer 2021 but this exercise took place across across the borough and is worth consideration in this analysis.

Although we do not hold information about the protected characteristics of residents in these blocks, what we do know in no uncertain terms is that the poor living conditions at Regina Road – and ongoing issues in the flats – are ongoing and continue to impact on the quality of life for many residents living in these blocks. The impact of poor housing is well documented and evidence of this for some protected characteristics groups is provided in the section below.

(Statistics documenting protected characteristics in the borough of Croydon, and available information about our residents is documented in Appendix 1.)

It is anticipated that the overall impact of the proposal to either refurbish or redevelop on the Regina Road estate will improve the living conditions and their experience of Croydon housing services, for most if not all residents living there. The aim is for this improvement to be experienced by all residents, including those within protected characteristic groups.

The intensive and rigorous consultation process which is required for a programme of this scale, will enable to us to clarify the needs of the diverse group of residents living on the estate and is an opportunity to identify improvements that could be made. Listening to residents will help us to understand and address any equalities issues which arise during the consultation process. This EQIA will be updated to reflect this as engagement with residents gains pace.

For each protected characteristic group show whether the impact of the proposed change on service users and/or staff is positive or negative by briefly outlining the nature of the impact in the appropriate column. . If it is decided that analysis is not relevant to some groups, this should be recorded and explained. In all circumstances you should list the source of the evidence used to make this judgement where possible.

Protected characteristic group(s)	Positive impact	Negative impact	Source of evidence
Age	Residents of all ages should benefit from the proposed scheme as we would anticipate seeing a significant improvement in the quality of all residents' homes and their experience of our housing services. Other benefits will be documented as the consultation process is developed and implemented.	None anticipated. Any decisions about the future of the estate will be shaped in consultation with residents and designed to provide better housing for them. Individual elements of the project will need to be assessed, predominantly through the planning process, as more detailed plans	There is strong evidence that poor housing has a negative impact on residents of any age, both in terms of their physical and mental health. (Ref: 1) 'Chance of a lifetime - the impact of bad housing on children's lives' Shelter,

		<p>are developed to ensure they produce either positive or neutral effects on people with protected characteristics. The council will adhere to the George Floyd Race Matters Pledge and Equalities Pledge as the Council's standard in equalities.</p> <p>The council will ensure that its engagement approach enables a wide and diverse range of tenants and leaseholders to be fully involved in the consultation process so that future changes on the estate embrace the needs of residents with of all ages.</p>	<p>2006; Ref 2) Housing for older and disabled people, Department for Levelling Up, Housing and Communities. Ref 3) Centre for Ageing Better, Good Home Inquiry, 2021.</p> <p>No clear data to evidence positive or negative impact on age but feedback from an engagement exercise in 2021 shows that females were less happy with their overall experience as a tenant/leaseholder with 28% finding the service excellent/good compared with 34% of males. 38% of females reported their experience to be poor/very poor compared with 32% males. The (small) youngest group surveyed appeared to be the most satisfied and least dissatisfied and the mid-age range groups appeared to be slightly more dissatisfied. However, there didn't appear to be any clear conclusions to be drawn from this demographic breakdown, with satisfaction levels fluctuating across the age ranges.</p>
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Disability	Residents with disabilities should benefit from the proposed scheme as we would anticipate seeing a significant improvement in the quality of all residents' homes and their experience of our housing services, including residents in need of adaptations as a result of a disability. Other benefits will be documented as the consultation process is developed and implemented.	<p>None anticipated. Any decisions about the future of the estate will be shaped in consultation with residents and designed to provide better housing for them. Individual elements of the project will need to be assessed, predominantly through the planning process, as more detailed plans are developed to ensure they produce either positive or neutral effects on people with protected characteristics. The council will adhere to the George Floyd Race Matters Pledge and Equalities Pledge as the Council's standard in equalities</p> <p>The council will ensure that its engagement approach enables a wide and diverse range of tenants and leaseholders to be fully involved in the consultation process so that future changes on the estate embrace the needs of residents with disabilities.</p>	<p>Ref 1) Housing for older and disabled people, Department for Levelling Up, Housing and Communities.</p> <p>Feedback from an engagement exercise in 2021 showed that satisfaction and dissatisfaction levels appear to be fairly consistent between those who did not state their day to day activities were limited because of a health problem or disability and those who did. The small 'unknown' group, who did not provide an answer to this question, showed greater dissatisfaction with their overall experience.</p>
Sex	Residents should benefit from the proposed scheme regardless of their sex as we would anticipate seeing a significant improvement in the quality of all residents' homes and their experience of our housing services. Other benefits will be documented as the consultation process is developed and implemented.	<p>None anticipated. Any decisions about the future of the estate will be shaped in consultation with residents and designed to provide better housing for them. Individual elements of the project will need to be assessed, predominantly through the planning process, as more detailed plans are developed to ensure they produce either positive or neutral effects on people with protected characteristics. The council will adhere to the George Floyd Race Matters Pledge and Equalities Pledge as the Council's standard in equalities.</p>	<p>Feedback from an engagement exercise in 2021 showed that females were less happy with their overall experience as a tenant/leaseholder with 28% finding the service excellent/good compared with 34% of males. 38% of females reported their experience to be poor/very poor compared with 32% males. The (small) youngest group surveyed appear to be the most satisfied and least dissatisfied and the mid-age</p>

		The council will ensure that its engagement approach enables a wide and diverse range of tenants and leaseholders to be fully involved in the consultation process so that future changes on the estate embrace the needs of residents of any sex.	range groups appear to be slightly more dissatisfied. However, there don't appear to be any clear conclusions to be drawn from this demographic breakdown, with satisfaction levels fluctuating across the age ranges.
Gender Identity	Residents should benefit from the proposed scheme regardless of their gender identity as we would anticipate seeing a significant improvement in the quality of all residents' homes and their experience of our housing services. Other benefits will be documented as the consultation process is developed and implemented.	<p>None anticipated. Any decisions about the future of the estate will be shaped in consultation with residents and designed to provide better housing for them. Individual elements of the project will need to be assessed, predominantly through the planning process, as more detailed plans are developed to ensure they produce either positive or neutral effects on people with protected characteristics. The council will adhere to the George Floyd Race Matters Pledge and Equalities Pledge as the Council's standard in equalities.</p> <p>The council will ensure that its engagement approach enables a wide and diverse range of tenants and leaseholders to be fully involved in the consultation process so that future changes on the estate embrace the needs of residents.</p>	No data to evidence positive or negative impact on gender reassignment
Marriage or Civil Partnership	Residents should benefit from the proposed scheme regardless of marriage or civil partnership groups as we would anticipate seeing a significant improvement in the quality of all residents' homes and their experience of our housing services.	None anticipated. Any decisions about the future of the estate will be shaped in consultation with residents and designed to provide better housing for them. Individual elements of the project will need to be assessed, predominantly through the planning process, as more detailed plans	No data to evidence positive or negative impact on marriage or civil partnership.

	<p>Other benefits will be documented as the consultation process is developed and implemented.</p>	<p>are developed to ensure they produce either positive or neutral effects on people with protected characteristics. The council will adhere to the George Floyd Race Matters Pledge and Equalities Pledge as the Council's standard in equalities.</p> <p>The council will ensure that its engagement approach enables a wide and diverse range of tenants and leaseholders to be fully involved in the consultation process so that future changes on the estate embrace the needs of residents.</p>	
Religion or belief	<p>Residents should benefit from the proposed scheme regardless of their religion or belief group, as we would anticipate seeing a significant improvement in the quality of all residents' homes and their experience of our housing services.</p> <p>Other benefits will be documented as the consultation process is developed and implemented.</p> <p>56.4% Christian, 8.1% Muslim, 6% Hindu, 20% no religion, 7.5% no stated.</p>	<p>None anticipated. Any decisions about the future of the estate will be shaped in consultation with residents and designed to provide better housing for them. Individual elements of the project will need to be assessed, predominantly through the planning process, as more detailed plans are developed to ensure they produce either positive or neutral effects on people with protected characteristics. The council will adhere to the George Floyd Race Matters Pledge and Equalities Pledge as the Council's standard in equalities</p> <p>The council will ensure that its engagement approach enables a wide and diverse range of tenants and leaseholders to be fully involved in the consultation process so that future changes on the estate embrace the needs of residents.</p>	<p>Currently no data to evidence positive or negative impact on religion or belief groups.</p>
Race	<p>Residents should benefit from the proposed scheme regardless of their race, as we would anticipate seeing a significant improvement in the quality of all residents' homes and their experience of our housing services.</p>	<p>None anticipated. Any decisions about the future of the estate will be shaped in consultation with residents and designed to provide better housing for them. Individual elements of the project will need to be</p>	<p>Feedback from an engagement exercise in 2021 showed that whilst around 35% of White, Asian and other groups rated their</p>

	<p>Other benefits will be documented as the consultation process is developed and implemented.</p>	<p>assessed, predominantly through the planning process, as more detailed plans are developed to ensure they produce either positive or neutral effects on people with protected characteristics. The council will adhere to the George Floyd Race Matters Pledge and Equalities Pledge as the Council's standard in equalities</p> <p>The council will ensure that its engagement approach enables a wide and diverse range of tenants and leaseholders to be fully involved in the consultation process so that future changes on the estate embrace the needs of residents.</p>	<p>experience of housing services as excellent or good, this was true of only 25% of Black residents and less than 20% of those in the Mixed/Multiple ethnicity group. There was also increased dissatisfaction amongst Black, Mixed/Multiple and Other groups – all around 41%, 10 points higher than the White group at 31%. These figures relate to housing services in general. The ARK report, commissioned by the council following unacceptable living conditions of some of our tenants at Regina Road, investigated allegations of discrimination on race ground. The report published in May 2021 concluded that it did not find evidence of this allegation.</p>
Sexual Orientation	<p>Residents should benefit from the proposed scheme regardless of their sexual orientation, as we would anticipate seeing a significant improvement in the quality of all residents' homes and their experience of our housing services.</p> <p>Other benefits will be documented as the consultation process is developed and implemented.</p>	<p>None anticipated. Any decisions about the future of the estate will be shaped in consultation with residents and designed to provide better housing for them. Individual elements of the project will need to be assessed, predominantly through the planning process, as more detailed plans are developed to ensure they produce either positive or neutral effects on people with protected characteristics. The council will adhere to the George Floyd Race Matters Pledge and Equalities Pledge as the Council's standard in equalities</p> <p>The council will ensure that its engagement approach enables a wide and diverse range</p>	<p>No data to evidence positive or negative impact on sexual orientation.</p>

		of tenants and leaseholders to be fully involved in the consultation process so that future changes on the estate embrace the needs of residents.	
Delivering Social Value	Once the future of Regina Road is determined through consultation with residents, the council would work to ensure social value provided by contractors helps more people into work. This will assist the more socially excluded in our community to become financially stable thereby reducing social isolation etc. Opportunities for work experience, training, and jobs will be offered to local residents through the social value aspect of any refurbishment or redevelopment scheme.	None. The council will explore opportunities for local residents, including work experience, training and job opportunities. The council will encourage the successful contractor to adhere to and sign up to the George Floyd Race Matters Pledge and Equalities Pledge as the Council's standard in equalities. This commitment to delivering social value supports the council's Community Sector strategy 2019-2023 to help Croydon become a more equal place through by tackling poverty, gaps in equality and inequality.	Social value element of any refurbishment or redevelopment scheme. contract will ensure these benefits are delivered.

Important note: You must act to eliminate any potential negative impact which, if it occurred would breach the Equality Act 2010. In some situations this could mean abandoning your proposed change as you may not be able to take action to mitigate all negative impacts.

When you act to reduce any negative impact or maximise any positive impact, you must ensure that this does not create a negative impact on service users and/or staff belonging to groups that share protected characteristics. **Please use table 4 to record actions that will be taken to remove or minimise any potential negative impact**

3.2 Additional information needed to determine impact of proposed change

Table 2 – Additional information needed to determine impact of proposed change

If you need to undertake further research and data gathering to help determine the likely impact of the proposed change, outline the information needed in this table. Please use the table below to describe any consultation with stakeholders and summarise how it has influenced the proposed change. Please attach evidence or provide link to appropriate data or reports:

Additional information needed and or Consultation Findings	Information source	Date for completion
<ul style="list-style-type: none"> Review data we hold about the protected characteristics of our customers at Regina Road cross-departmentally 	Social care services, major adaptations team, tenancy services, allocations	TBC

<ul style="list-style-type: none"> Review how and what information will be collected once new IT system is implemented to enable us to analyse customer satisfaction levels across protected characteristics. 	NRC project documentation	TBC
<ul style="list-style-type: none"> Consider how to analyse customer satisfaction by protected characteristics as part of ongoing contract monitoring. 	Procurement development best practice, 2022 Equalities Pledge	TBC

For guidance and support with consultation and engagement visit <https://intranet.croydon.gov.uk/working-croydon/communications/consultation-and-engagement/starting-engagement-or-consultation>

3.3 Impact scores

Example

If we are going to reduce parking provision in a particular location, officers will need to assess the equality impact as follows;

1. Determine the Likelihood of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the likelihood of impact score is 2 (likely to impact)
2. Determine the Severity of impact. You can do this by using the key in table 5 as a guide, for the purpose of this example, the Severity of impact score is also 2 (likely to impact)
3. Calculate the equality impact score using table 4 below and the formula **Likelihood x Severity** and record it in table 5, for the purpose of this example - **Likelihood (2) x Severity (2) = 4**

Table 4 – Equality Impact Score

Severity of Impact	3	3	6	9
	2	2	4	6
	1	1	2	3
		1	2	3
	Likelihood of Impact			

Key

Risk Index	Risk Magnitude
6 – 9	High
3 – 5	Medium
1 – 3	Low

Table 3 – Impact scores

Column 1 PROTECTED GROUP	Column 2 LIKELIHOOD OF IMPACT SCORE Use the key below to score the likelihood of the proposed change impacting each of the protected groups, by inserting either 1, 2, or 3 against each protected group. 1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact	Column 3 SEVERITY OF IMPACT SCORE Use the key below to score the severity of impact of the proposed change on each of the protected groups, by inserting either 1, 2, or 3 against each protected group. 1 = Unlikely to impact 2 = Likely to impact 3 = Certain to impact	Column 4 EQUALITY IMPACT SCORE Calculate the equality impact score for each protected group by multiplying scores in column 2 by scores in column 3. Enter the results below against each protected group. Equality impact score = likelihood of impact score x severity of impact score.
Age	1	1	1
Disability	1	1	1
Gender	1	1	1
Gender reassignment	1	1	1
Marriage / Civil Partnership	1	1	1
Race	1	1	1
Religion or belief	1	1	1
Sexual Orientation	1	1	1
Pregnancy or Maternity	1	1	1

4. Statutory duties

4.1 Public Sector Duties

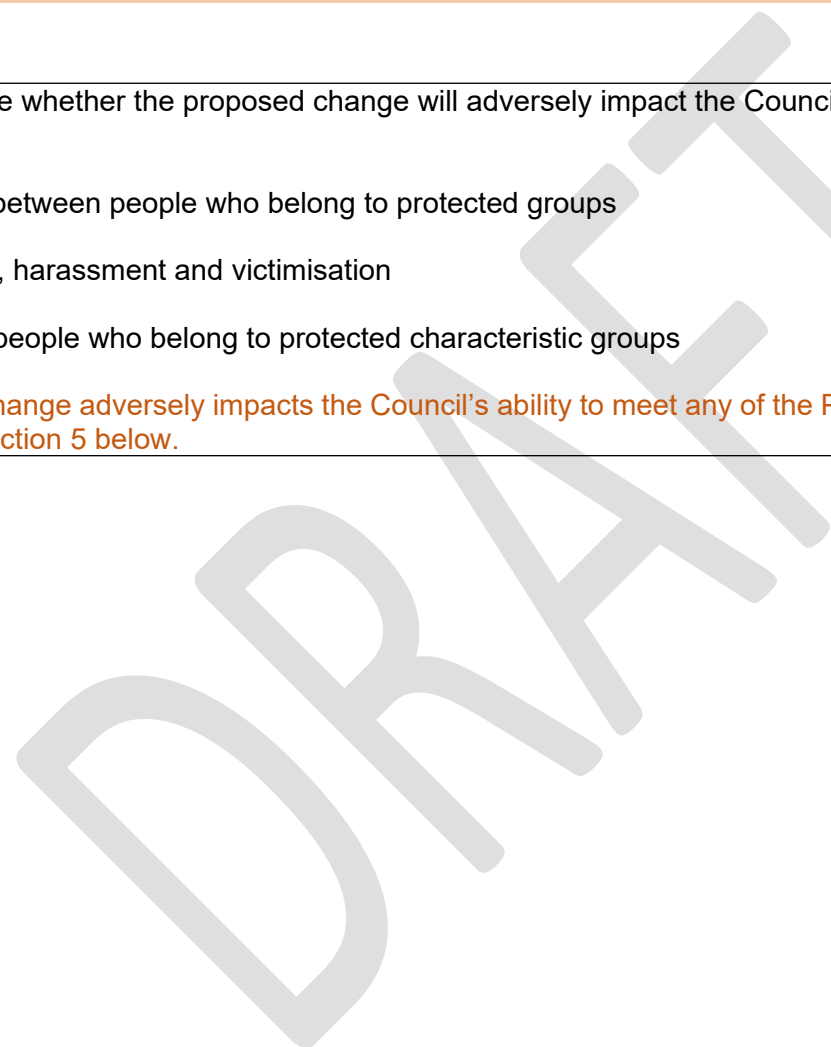
Tick the relevant box(es) to indicate whether the proposed change will adversely impact the Council's ability to meet any of the Public Sector Duties in the Equality Act 2010 set out below.

Advancing equality of opportunity between people who belong to protected groups

Eliminating unlawful discrimination, harassment and victimisation

Fostering good relations between people who belong to protected characteristic groups

Important note: If the proposed change adversely impacts the Council's ability to meet any of the Public Sector Duties set out above, mitigating actions must be outlined in the Action Plan in section 5 below.



5. Action Plan to mitigate negative impacts of proposed change

Important note: Describe what alternatives have been considered and/or what actions will be taken to remove or minimise any potential negative impact identified in Table 1. Attach evidence or provide link to appropriate data, reports, etc:

Table 4 – Action Plan to mitigate negative impacts

Complete this table to show any negative impacts identified for service users and/or staff from protected groups, and planned actions mitigate them.

Protected characteristic	Negative impact	Mitigating action(s)	Action owner	Date for completion
Disability	None anticipated			
Race	None anticipated			
Sex (gender)	None anticipated			
Gender reassignment	None anticipated			
Sexual orientation	None anticipated			
Age	None anticipated			
Religion or belief	None anticipated			
Pregnancy or maternity	None anticipated			
Marriage/civil partnership	None anticipated			

6. Decision on the proposed change

Based on the information outlined in this Equality Analysis enter **X** in column 3 (**Conclusion**) alongside the relevant statement to show your conclusion.

Decision	Definition	Conclusion - Mark 'X' below

Equality Analysis

No major change	Our analysis demonstrates that the policy is robust. The evidence shows no potential for discrimination and we have taken all opportunities to advance equality and foster good relations, subject to continuing monitoring and review. If you reach this conclusion, state your reasons and briefly outline the evidence used to support your decision. Engaging with residents about the options for the future of Regina Road is an opportunity to ensure that homes for those living on these sites are fit for purpose and provide equal and equally accessible housing provision and services across all protected characteristics. Consultation is an opportunity to make significant enhancements in these areas where provision is currently lacking. We will take steps to ensure this by facilitating consultation in a variety of methods ways so that all residents are able to contribute.	Yes
Adjust the proposed change	We will take steps to lessen the impact of the proposed change should it adversely impact the Council's ability to meet any of the Public Sector Duties set out under section 4 above, remove barriers or better promote equality. We are going to take action to ensure these opportunities are realised. If you reach this conclusion, you must outline the actions you will take in Action Plan in section 5 of the Equality Analysis form	No
Continue the proposed change	We will adopt or continue with the change, despite potential for adverse impact or opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the change. However, we are not planning to implement them as we are satisfied that our project will not lead to unlawful discrimination and there are justifiable reasons to continue as planned. If you reach this conclusion, you should clearly set out the justifications for doing this and it must be in line with the duty to have due regard and how you reached this decision.	No
Stop or amend the proposed change	Our change would have adverse effects on one or more protected groups that are not justified and cannot be mitigated. Our proposed change must be stopped or amended.	No
Will this decision be considered at a scheduled meeting? e.g. Contracts and Commissioning Board (CCB) / Cabinet		Meeting title: Date:

7. Sign-Off

Officers that must approve this decision		
Equalities Lead	Name:	Date:
	Position:	
Director	Name:	Date:
	Position:	

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Appendix 1

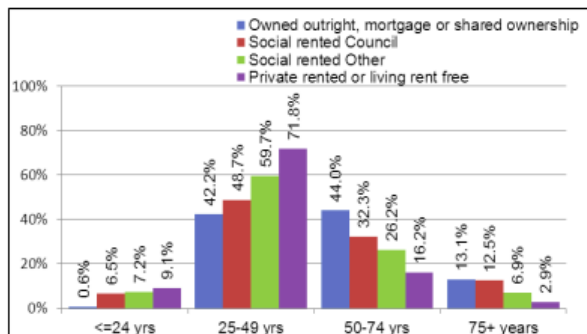
Croydon Council has a social housing stock of approximately **13,500 properties (61% flats, 39% street properties)**. In addition, there are also approximately 2,500 leaseholders. The information we hold about our residents in relation to protected characteristics is incomplete. Whilst we have insight into the age, sex and race / ethnicity of our tenants and leaseholders, information in relation to disability, sexual orientation and other protected characteristics is not available to us. Therefore, we need to draw on data that is available via Croydon Observatory to draw some conclusions about the profile of residents living in our homes. This equalities impact assessment is a working document and will be updated during the reprocurement process and will highlight where action is needed to improve in this area.

Age

We know the age of 95% of our customers (13607/14345). The majority of the missing 5% are tenancies held for many years (going back to early 1970's) so are most likely to be older/elderly. We know that 4.4% are aged between are 20-29, 15.6% are 30-39, 19.4% 40-49

Age	20-29	30-39	40-49	50-59	60-69	70-79	80+
%	4.4%	15.6%	19.4%	25.0%	17.7%	10.8%	7.1%

Figure 1 - Tenure type by age bands in Croydon in 2011



Source: ONS, Census 2011, Table DC4201EW

Figure 1 - Tenure type by age bands in Croydon in 2011 Source: ONS, Census 2011, Table DC4201EW.

Race

We know the ethnicity of 78.3% of our customers (11236/14345). Again, where there are gaps, these are for the longer held tenancies.

Ethnicity	Asian	Black	Mixed/multiple	White	Other
%	9.2%	37.9%	4.2%	46.2%	2.5%

The Croydon population continues to grow from long-term international migration and 34.6% of the population is made up of non-UK born residents according to ONS 2020 estimates. Croydon has a higher proportion of residents from Asian/Asian British, mixed or multiple ethnic groups, Black/African/Caribbean/Black British and other ethnic groups compared to the national average. proportion of Asian and Black residents in Croydon has been increasing since the 2011 Census. The proportion of White population was predicted to decrease by almost 10% by 2021. Source: GLA 2016 Housing-led projections by ethnicity.

Gender

Records are held for 14343/14345 = 99.99% of our customers as follows:

Equality Analysis

Female	67.0%
Male	33.0%

Disability

We hold disability information for housing applicants and for council tenants but much of this data is held in “free text” fields making it difficult to analyse and is not easily extractable from our housing tenant database. Currently we This figure accounts for just 5% of our customers. Looking to other data for insight there is not one comprehensive figure that can give a true picture of the total number of people with a disability in Croydon. The 2011 Census figures showed that 14.1% of the population in Croydon had their day-to-day activities limited to some extent by a long-term health problem or disability. 22,493 people had their day-to-day activities limited a lot, whilst 28,134 had their day-to-day activities limited a little.

We know that since 2008, our major adaptations team in housing have carried out 1556 adaptations to council properties. On top of that figure would be any level access showers installed via the decent homes program, plus any adaptations carried out before 2008.

Social value

According to the borough profile 2018 Croydon is the bottom third (220th most deprived authority out of 336 district authorities) for the Education, skills and training domain. Social housing is often associated with the council’s more deprived residents, so social value can provide key benefits to this group of residents in a number of ways, including: employment opportunities for local and disadvantage people, improved skills for local people or those facing barriers to employment and improved employability of young people.

Deprivation

There remains geographic inequality in the distribution of deprivation in the borough with the North and East of the borough remaining more deprived than the South. Ref [Borough Profile \(croydonobservatory.org\)](http://croydonobservatory.org) Dec 2021 81% of Council owned homes are in areas identified with high levels of social deprivation, (Indices of Multiple Deprivation Decile 1-3). Four Places have large concentrations of social deprivation. These are in Addington, Broad Green & Selhurst, Shirley, and Waddon.

Sexuality

We have significant gaps in our data concerning sexual orientation in respect of council tenants, housing applicants and homeless households. Equality and Human Rights Commission guidance on this protected characteristic is to collect it where relevant, ONS produced its Integrated

Equality Analysis

Household Survey for the calendar year of 2014 with its mid-year population estimates. By applying the London average to the Croydon population it was estimated that there were about 9,800 people in Croydon who would have identified as being gay, lesbian or bisexual.

Social deprivation

81% of Council owned homes are in areas identified with high levels of social deprivation, (Indices of Multiple Deprivation Decile 1-3). Four Places have large concentrations of social deprivation. These are in Addington, Broad Green & Selhurst, Shirley, and Waddon. According to the borough profile 2018 Croydon is the bottom third (220th most deprived authority out of 336 district authorities) for the Education, skills and training domain.

Working adults

Based on the ONS annual population survey for the calendar year 2020, only 5.0% of Croydon's resident population aged 16-64 years had no qualification. Adults from a White ethnic background in Croydon in the 2011 Census were more likely to have no qualifications than adults from any other ethnic background. Over a half (51.4%) of the residents from the Asian community had level 3 and level 4 qualifications which was the highest proportion compared to the other ethnic communities.

Housing

According to the 2011 Census, 60% of all Croydon 145,000 households were owner occupied, 20% were private rented and 18% were households living in social housing. Social housing in Croydon is mainly concentrated in the northern parts and the eastern edge of the borough. Census 2011 showed that in the east, the former wards of Fieldway, (now New Addington North), and New Addington, (now New Addington South), had the highest proportions of social housing (council homes and other) with 60.6% and 42.2% respectively

Gender identity

We have significant gaps in our data concerning gender reassignment; however, recent improvements in our data collection methods will address this gap over time, however we will only collect this data where relevant to service delivery.

Language

The Census 2011 showed that 14.5% of people in Croydon had a language other than English recorded as their main language. The majority could speak English well but around 1 in 6 of this group (17.2%) amounting to 2.5% of the total Croydon population at the time could not speak English well or at all.

Equality Analysis

Sexual orientation

We have significant gaps in our data concerning sexual orientation in respect of council tenants, housing applicants and homeless households. Census data provides an good estimate of the diversity of religious belief in Croydon.

Marital status

We do not hold marital status data for around one in three council tenants.

DRAFT

CABINET REPORT TEMPLATE AND GUIDANCE

REPORT TO:	CABINET 16 NOVEMBER 2022
SUBJECT:	THE VIOLENCE REDUCTION NETWORK'S STRATEGIC ASSESSMENT 2022
LEAD OFFICER:	Nick Hibberd Corporate Director of Sustainable Communities, Regeneration & Economic Recovery Kristian Aspinall Interim Director Culture & Community Safety
CABINET MEMBER:	<i>Councillor Ola Kolade</i> Cabinet Member for Community Safety
WARDS:	All

SUMMARY OF REPORT:

The yearly Strategic Assessment (SA) is an analytical document where specific recommendations are made to ensure the priorities highlighted in the Community Safety Strategy are to be reached or amended where necessary in reducing crime and anti-social behaviour (ASB) in the borough.

FINANCIAL IMPACT:

There are no significant financial impacts from the SA identified and no additional funding is being requested. The SA looks to minimise costs while maximising service delivery.

KEY DECISION: Not a key decision.

RECOMMENDATION:

The Executive Mayor, in Cabinet, is recommended to support the findings and recommendations in the SA, and the agreement of a revised partnership plan by the Safer Croydon Partnership which will implement the nine recommendations in the SA.

1. What is the Strategic Assessment?

- 1.1 Using the definition provided by the College of Policing, the Strategic Assessment is an analytical product which gives an overview of the current and long-term crime and anti-social behaviour issues affecting or likely to affect the borough. It should be used to draw inferences and to make recommendations for prevention, intelligence, enforcement and reassurance

priorities, and the future Community Safety Strategy. The product is a statutory obligation of the Community Safety Partnership under the Crime & Disorder Act 1998.

- 1.2 The document covers the last five financial years (2017/18 to 2021/22) with a specific focus on the last financial year (2021//22).
- 1.3 The analysis is based on the problem-oriented approach, which is designed to view crime as a “problem” and not an individual incident. Therefore, this switches the focus on the underlying causes of those problems and how to tackle them. The problem-oriented approach is based on the routine activity theory that for crime to occur, three components are required: an offender to be present, a victim or target to be present and the absence of a suitable guardian. As well as this there is also the absence of two other “controllers” – for offenders these are known “handlers” (e.g. parents or teachers) and for the place this is known as the manager or place management which can be a person (e.g. a police officer) or better place management approaches (e.g. CCTV installation).



- 1.4 To ensure that the analysis is conducted thoroughly, the framework used in the document complies with the principles of what is known as the “5WH” which is the following:
- *What* is the problem?
 - *Who* is involved?
 - *When* is it happening?
 - *Where* is it happening?
 - *Why* is it happening?
 - *How* is it happening?
- 1.5 In 2019 the Partnership adopted the “Public Health” approach in reducing violence in the borough. This is detailed in the 2019 Strategic Assessment available on the Council’s website. At the core of a public health approach is to ensure it is data driven. The SA is the main strategic document the partnership can use to ensure that the Public Health approach is reached and maintained.

2. MAIN FINDINGS FROM THE STRATEGIC ASSESSMENT

- 2.1 There has been a 7% increase in crime in 2021/22 compared to 2020/21 whereas the average London borough saw a 12% increase. It should be noted that part of this increase is because 2020/21 partly involved government restrictions on daily activity because of the Covid-19 pandemic. However, the number of offences has reached its second highest in 2021/22 over the five-year period (2017/18 to 2021/22).
- 2.2 The number of offences committed in the borough in 2021/22 was the second highest over the last five years. Violence is the main contributor to this overall increase, on average increasing annually by 7% over the last four years compared to 5% for the average London borough. Violence contributes to a third of all crime in the borough each year.
- 2.3 There is also concern over crime harm in the borough, rising by 8% in 2021/22 compared to 2021/20. This is the second highest it's been over the five-year period. This rise in harm is not only because of the recent rise in sexual harm in 2021/22 compared to the year before but particularly due to the significant continual increase in violent harm over the last three years. This has resulted in violent harm from representing a quarter of all harm in 2017/18 to representing almost a third of all harm in 2021/22.
- 2.4 Both violence with injury (VWI) and violence without injury (VWol) have substantially increased in the borough. This is due to both an increase in domestic and non-domestic related violence in the borough.
- 2.5 For VWol offences, there have been significant increases in malicious communications with intent to cause distress and anxiety, especially during the Covid-19 pandemic. However, there has also been notable increases in relatively "low volume" crime types including threats to kill, stalking and cruelty to and neglect of children.
- 2.6 The continual increase in violent harm is mainly due to the increase in VWI both domestically and non-domestically. The analysis done specifically on "street-based" violence shows that this type of violence was at its highest in 2021/22 over the last five years.
- 2.7 Violence is highly concentrated in specific "micro-areas" in the borough, with 2% of the borough containing/responsible for over a third of all violent crime volume and over three quarters of all violent harm. The areas identified can be found in the Appendix A page 26.
- 2.8 Even though almost 60% of victims of violence were less than a mile from their home, the number of victims travelling from outside of the borough is growing, especially amongst young people aged 10 to 17 years old.
- 2.9 The analysis uses a specific "2 x 2" model to identify and prioritise victims of violence. The model shows that it is a small proportion of victims of violent crime who suffer the majority of harm.

- 2.10 The rise of violent harm, especially towards females, is of significant concern where it is increasing by almost a fifth on average each year over the last four years. This is due to the rise in domestic violence and the rise of street-based violence towards females.
- 2.11 Even though males continue to make up the overwhelming majority of offenders as well as the amount of harm committed, there are significant increases in both volume and harm committed by female offenders.
- 2.12 The analysis demonstrated on the effectiveness of targeting the “victim-offender” is also hugely beneficial to the borough. These individuals make up 4% of all individuals compared to 84% of victims and 16% of offenders but are involved in almost three times the number of offences per person. They are also involved in almost five times the amount of harm as victims and almost three times the amount of harm as offenders.
- 2.13 Hotspot mapping shows that the Partnership’s “Priority Localities Index” (as documented in last year’s Strategic Assessment) should continue to be followed to tackle the underlying causes of crime in the borough. The areas identified can be found in the Appendix A page 45.
- 2.14 The implementation of Risk Terrain Modelling (RTM), which is used to evaluate the features of the environment in areas of high violence, identified specific characteristics which should be addressed by the Partnership. This includes bus stops and attributes linked to drugs and alcohol.

3. RECOMMENDATIONS FROM THE STRATEGIC ASSESSMENT

- 3.1 To write a problem profile on Violence Against Women and Girls (VAWG) in the borough which will feed into the VAWG strategy. This is not only to cover both domestic and non-domestic violence and sexual offences but other specific offences which have seen notable increases including stalking, threats to kill and malicious communications.
- 3.2 To evaluate and target “high volume high harm” micro-areas of violence using Risk Terrain Modelling so appropriate short, medium and long-term interventions can be implemented.
- 3.3 To investigate further into the rise in victims travelling from outside of the borough and to work with the relevant authorities in those areas to protect potential victims who are travelling from there.
- 3.4 To explore and utilise the “2 x 2” model to prioritise appropriate interventions for individuals involved in violence.
- 3.5 To further explore the concept of “victim-offenders” so that intensive long-term provision can be provided to significantly reduce all crime in the borough, not just violence.

- 3.6 To further utilise alcohol and substance misuse service provision.
- 3.7 To have a greater focus on public transport in the borough, especially around bus stops which have been identified as a high-risk factor for violence.
- 3.8 To further investigate cruelty and neglect of children, which has seen a small but significant increase in the borough.
- 3.9 With the increase in knife crime being specifically driven by knife-enabled robbery, this is to be a priority for the next 12 months.

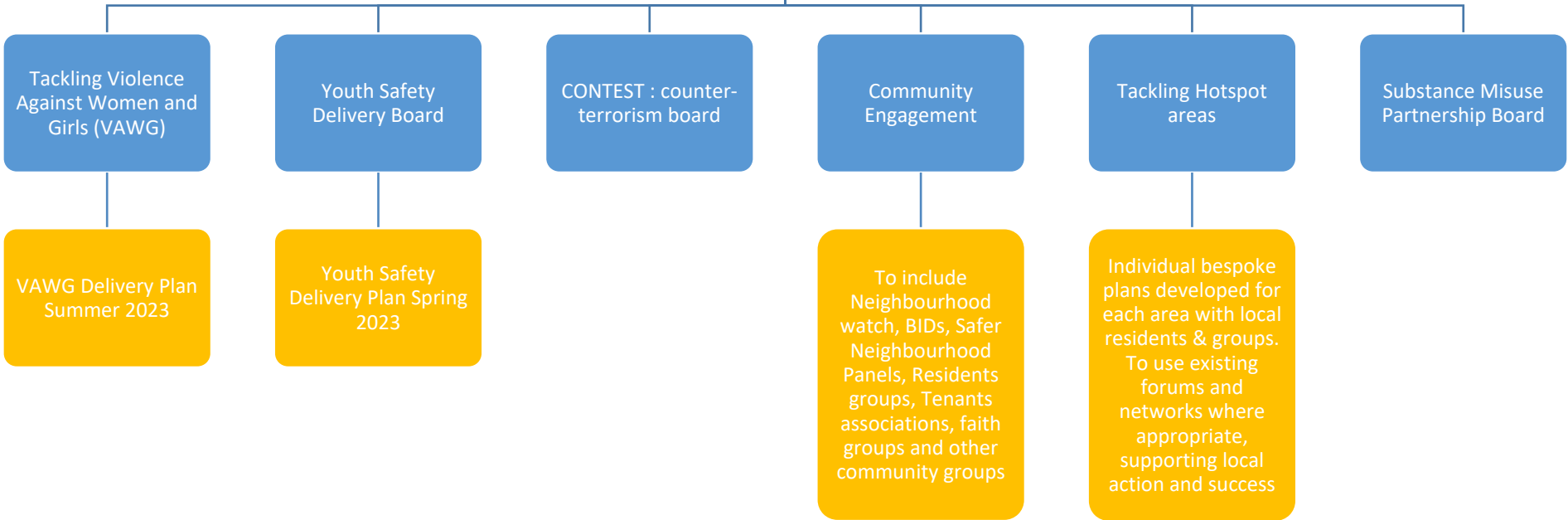
4. RECOMMENDATIONS ON THE SAFER CROYDON PARTNERSHIP

- 4.1 The Safer Croydon Partnership (SCP) is the statutory crime reduction partnership made up of the Local Council, Police, Health, Fire Brigade, and Probation, which has the legal duty to develop and deliver joint plans to reduce crime in Croydon.
- 4.2 It is chaired by the Cabinet Member of Community Safety and has many members from the statutory agencies and co-opted members from community groups and other agencies.
- 4.3 It also has the statutory duty of overseeing and conducting Domestic Violence Homicide Reviews when a domestic violence homicide occurs in Croydon.
- 4.4 The strategic assessment is the data product that underpins all strategic decision making by the SCP for the next 12 months.
- 4.5 Following agreement of this strategic assessment, the partnership will then do a complete whole refresh of the borough's 2022 Community Safety Strategy. This will be followed by targeted delivery plans to improve youth safety, reduce violence against women and girls, and to tackle issues in "hot-spot areas" identified through the strategic assessment.
- 4.6 As part of the Executive Mayor's commitment to partnership working with Police and other partners, we are currently working with the statutory partners to review the form and function of the SCP. We are aiming to streamline governance and accountability so that the partnership can focus on its key priorities effectively to make Croydon safer.
- 4.7 We are currently meeting with each statutory partner and the shadow cabinet member for Community Safety to ensure their views and suggestions are incorporated into the revised partnership, which will be agreed in December 2022.
- 4.8 We are currently proposing several key changes to the partnership that include:

Cabinet & Executive Template

- Reducing the membership of the Executive to the five statutory partners and the cabinet member & shadow cabinet member for Community Safety
- Creating a specific “Community Engagement” group to ensure that all voices in Croydon are heard, including Neighbourhood Watch, the BIDs, Safer Neighbourhood Panels, the Safer Neighbourhood Board, residents and Housing Associations and other groups, who previously have not been part of the SCP.
- This group will feed into all the work of the other boards to ensure that community voices are heard throughout all the work. Community members & groups may also sit on the other sub-boards depending on the nature of their work.
- Refreshing the boards that sit below the SCP to focus specifically on delivery plans, with clear performance indicators and targets for each priority area.
- To tackle hotspot areas, rather than a single plan we will work with local groups and forums to support their action and work rather than create a duplicate structure. These bespoke local plans will reflect the issues of each area, rather than try and deliver a “one size fits all” approach.
- Creating a specific Contest sub-group, to focus on the confidential work the borough is delivering on to fulfil its Prevent and Protect duties as per the national Contest strategy to stop people becoming terrorist and make our public spaces safe from terrorist attacks.
- Placing the new Substance Misuse Partnership board within the SCP framework. This is a new board required by the national government to oversee our work to reduce substance misuse and the harm caused, chaired by the Director of Public Health and vice-chaired by the Director of Culture and Community Safety. This program will also report into the Health and Wellbeing board.
- The delivery plans for the Youth Safety Plan to be in place by spring 2023 and the VAWG plan by summer 2023.

Safer Croydon Executive



5. NEXT STEPS

- 5.1 The SA to be presented and discussed at the Safer Croydon Partnership and relevant boards to implement the recommendations where possible.
- 5.2 To publish the SA on the Council website to provide the public the information on crime and ASB in the borough along with the actions of the Partnership for the next 12 months.

6. REASONS FOR RECOMMENDATIONS/PROPOSED DECISIONS

- 6.1 The Council has a duty to do all that it reasonably can to prevent crime and disorder in its area and work towards delivering the objectives of the Safer Croydon Partnership plan. It adopted a Public Health Approach in 2019 where it is imperative for the approach to be data-driven. The SA is the main, data-driven, strategic, analytical product which the partnership can use to target its resources effectively.
- 6.2 The Council has a duty to do all that it reasonably can to prevent crime and disorder in its area and work towards delivering the objectives of the Safer Croydon Partnership plan. Violence Against Women and Girls (VAWG) is one of the priorities of the partnership and for Croydon. There are several recommendations in the SA that will directly assist in meeting the Council's pledge in reducing Violence Against Women and Girls.

7. OPTIONS CONSIDERED AND REJECTED

- 7.1 Do Nothing – the Police, Community groups and Council will continue to work in partnership as they do in order to try and prevent the behaviour from taking place.

8. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

8.1 Revenue and Capital consequences of report recommendations

There are no capital or revenue implications associated with this report. There are no significant financial impacts from the Policy identified and no additional funding is being requested.

8.2 The effect of the decision

If we were to implement all recommendations from the SA, it would reinforce the Partnership's data driven public health approach in reducing violence in the borough. Many of the recommendations involve targeting the limited resources the Partnership has to maximise benefits for residents. A number of the recommendations involve several tried-and-tested approaches.

8.3 Risks

As stated previously in the report, there has been a significant increase in crime, particularly violence, in the borough. If the Partnership does not take action based on the analysis it is very possible that the number of violent offences and violent harm continues to increase which may result in further loss of life.

8.4 Options

To approve the recommendations of the Strategic Assessment and agree to publish the document to reinforce the borough's commitment to reducing violence in the borough using a public health approach.

To not approve the recommendations and publication of the Strategic Assessment.

8.5 Future savings/efficiencies

There are no clear savings or efficiencies associated with this report.

(Approved by: *[A N. Other]*, Department Head(s) of Finance/nominated deputy(ies))

9. LEGAL CONSIDERATIONS

9.1 The Safer Croydon Partnership (SCP) acts as the statutory Community Safety Partnership for Croydon, as stipulated by the Crime and Disorder Act 1998. The SCP is responsible for co-ordinating the development and implementation of Croydon's Community Safety Strategy. The partnership comprises the police, council, fire, probation and health agencies, as well as businesses, and community and voluntary sector organisations. It works with other boards on Croydon's Local Strategic Partnership on crime and safety matters, in particular the Safeguarding Children Partnership and the Adults Safeguarding Board.

9.2 A statutory obligation of the SCP is the yearly Strategic Assessment where through analysis on crime and ASB is conducted in the borough to provide informed recommendations for the SCP to target its resources for the following 12 months. This is done in accordance with the Council's agreed "public health" approach.

Approved by Mark Turnbull, on behalf of the interim Director of Legal Services & Deputy Monitoring Officer

10. HUMAN RESOURCES IMPACT

10.1 There are no staffing implications or any other HR impact arising from this report or from this decision.

Approved by: *Jennifer Sankar, Head of HR, Housing and Sustainable Communities, Regeneration and Economic Development Directorates, for and on behalf of Dean Shoesmith, Chief People Officer*

11. EQUALITIES IMPACT

- 11.1 The Council has a statutory duty to comply with the provisions set out in the Equality Act 2010. In summary, the Council must in the exercise of all its functions, “have due regard to” the need to comply with the three arms or aims of the general equality duty. These are to:
- eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Act;
 - advance equality of opportunity between people who share a protected characteristic and people who do not share it; and
 - foster good relations between people who share a protected characteristic and people who do not share it.
- 11.2 The SA does highlight in the analysis and recommendations specific groups of individuals with protected characteristics which require targeted resources in order to improve safety, namely females, children and young people.

Approved by: Denise McCausland – Equality Programme Manager

12. ENVIRONMENTAL IMPACT

- 12.1 There is limited impact on the environment as a result of this report. Some hotspot areas identified by the partnership may be related to waste, noise or other issues that affect people’s quality of life. The SA is principally about improving behaviour.
- 12.2 (Approved by: *[A N. Other]* on behalf of the Director of XX)

13. CRIME AND DISORDER REDUCTION IMPACT

- 13.1 It is a statutory obligation for every local authority to write and publish a year Strategic Assessment under the Crime and Disorder Act 1998. The document is integral to the Safer Croydon Partnership’s Public Health Approach in reducing crime, particularly violence, in the borough. It assists in fully utilising the services of partner agencies in a targeted way, ensuring a holistic approach in reducing crime and ASB.

Approved by: Kristian Aspinall - Director of Culture & Community Safety

14. DATA PROTECTION IMPLICATIONS

14.1 WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?

YES – Personal data has been processed to provide aspects highlighted in the SA, namely the slides on “victim-offenders” and the “2 x 2” model on victims and offenders. However, no personal information is shown in the document and no individual can be identified in the document whatsoever.

(If yes, please provide brief details as to what 'personal data' will be processed and complete the next question).

(If no, please complete the sign off)

14.2 HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN COMPLETED?

NO – As no personal information is in the document and, therefore, no individual can be identified, a DPIA was deemed not required.

(If yes, please attach a copy).

(If no, please provide the reason why a DPIA was not completed. Please also attach any relevant advice)

14.3 The Director of Culture and Community Safety comments that no DPIA is necessary due to the nature of the report.

CONTACT OFFICER: *Lewis Kelly, Intelligence & Performance Manager.*

APPENDICES TO THIS REPORT:

[Appendices to be attached to this report must be listed in number order below]

APPENDIX A – STRATEGIC ASSESSMENT 2022

BACKGROUND DOCUMENTS – LOCAL GOVERNMENT ACT 1972

[For executive decision making it is a requirement that all Part A (open) reports & Part B reports (closed) must list and provide an electronic and a printed copy of all background reference.]

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Violence Reduction Network

Strategic Assessment 2022

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Executive Summary

Year-on-year comparison

In the aftermath of the Covid-19 pandemic and the removal of government-imposed restrictions placed on society as a result, it should be of no surprise that there has been a 7% increase in crime in the borough in 2021/22 compared to the year before (2020/21). The London average* saw a 12% increase. However, the number of offences committed in the borough for that year (2021/22) is the second highest over the last five years. Violence remains to be the main contributor to this increase in crime volume, representing a third of all offences this year.

Crime harm (refer to page 6 for definition) is also of concern in the borough with an 8% increase in 2021/22 compared to the year before (2020/21) and it also reaching its second highest level over the last five years (2017-2022). Not only is this because of the recent rise in sexual harm in 2021/22 compared to the year before but the significant continual increase in violent harm in the borough over the last three years (2019-2022). This has resulted in violent crime going from representing a quarter to just under a third of all harm – almost as equal to sexual offences which on average represents a third of all harm each year but a relatively lower proportion of all crime volume at around 3%.

Crime Types

There has also been a significant increase in hate crime (refer to page 13), which requires greater in-depth analysis. In regards to knife crime, there has been continual reduction in knife injuries but knife crime volume is being driven by a considerable rise in knife-enabled robbery.

Both violence with injury (VWI) and violence without injury (VWol) have substantially increased in the borough. This is due to an increase in both domestic-related and non-domestic-related violence. For VWol offences, there have been significant increases in malicious communications with intent to cause distress and anxiety, especially during the Covid-19 pandemic. However, there has also been notable increases in relatively “low volume” crime types including threats to kill, stalking and cruelty to and neglect of children.

The continual increase in violent harm is mainly due to the increase in VWI both domestically and non-domestically. The analysis done specifically on “street-based” violence shows that this type of violence was at its highest in 2021/22 over the last five years.

*This is the average London borough out of all 32 boroughs.

Executive Summary

Area-based

Violence is highly concentrated in specific “micro-areas” in the borough, with 2% of the borough containing/responsible for over a third of all violent crime volume and over three quarters of all violent harm. The occurrence of violence in most of these areas is stable over a long period. It is these areas the Safer Croydon Partnership should focus on to effectively reduce violence as stated in the Community Safety Strategy.

Victims

Even though almost 60% of victims of violence were less than a mile from their home, the number of victims travelling from outside of the borough is growing. The average miles travelled by victims, especially those aged 10 to 17, is also growing where in 2021/22 those in this age group also suffered the highest amount of harm compared to what they suffered the four years before. This is due to both a rise in both domestic and street-based harm towards this age group.

Using a specific “2 x 2” model to identify and prioritise victims of violence (refer to page 34), it shows that it is a small proportion of victims of violent crime who suffer the majority of harm. The rise of violent harm, especially towards females, is of significant concern where it is increasing by almost a fifth on average each year over the last four years. This is due to the rise in domestic violence and the rise of street-based violence towards females.

Offenders

Using the 2 x 2 model shows that violent offenders are more random compared to victims. However, this could be because of a number of factors including the reluctance of the victim to cooperate in order to charge the offender, this is not just limited to domestic violence but the fear of reprisals from victims in regards to street-based violence too. Even though males continue to make up the overwhelming majority of offenders as well as the amount of harm committed, there are significant increases in both volume and harm committed by female offenders.

Victim-Offenders

The analysis demonstrated on the effectiveness of targeting the “victim-offender” is also hugely beneficial to the borough (refer to page 42). These individuals make up 4% of all individuals compared to 84% of victims and 16% of offenders but are involved in almost three times the number of offences per person. On top of this, they are involved in almost five times the amount of harm as victims and almost three times the amount of harm as offenders. It is the victim-offenders that have a predominant role in all crime in the borough.

Executive Summary

The Underlying Causes of Violence

To tackle the underlying causes of violence, the borough's Priority Localities Index identifying the nine priority neighbourhoods in Croydon (refer to page 45), continues to be of vital importance. On top of this, the recent implementation of Risk Terrain Modelling in the VRN (refer to page 46) to evaluate the features of the environment of particular areas which contain a high concentration of violence is to be expanded to priority areas of violence. This is to ensure there is a balance of focusing on places as well as people.

Public Transport

Analysis done by using RTM showed bus stops being the top "risk factor" in street-based violence in the borough. This is in accordance with public surveys conducted last year, especially on women and girls and their safety in the borough which highlighted bus stops to be the place they felt most unsafe. Young people also listed "public transport" as the third highest place they feel unsafe on.

Alcohol and Substance Misuse

The analysis conducted using RTM also identified alcohol and substance misuse related factors as high risk in regards to fuelling violence in the borough.

Executive Summary

From the analysis conducted in this document, the following recommendations are:

1. To write a **problem profile on Violence Against Women and Girls (VAWG)** in the borough which will feed into the VAWG strategy. This is not only to cover both domestic and non-domestic violence and sexual offences but other specific offences which have seen notable increases including stalking, threats to kill and malicious communications.
2. To evaluate and target **“high volume high harm” micro-areas** of violence using Risk Terrain Modelling so appropriate short, medium and long-term interventions can be implemented.
3. To investigate further into the **rise in victims travelling from outside of the borough** and to work with the relevant authorities in those areas to protect potential victims who are travelling from there.
To explore and utilise the “2 x 2” model to **prioritise appropriate interventions for individuals involved in violence.**
4. To further explore the concept of **“victim-offenders”** so that intensive long-term provision can be provided to significantly reduce all crime in the borough, not just violence.
6. To further utilise **alcohol and substance misuse service provision.**
7. To have a greater focus on **public transport in the borough**, especially around bus stops which have been identified as a high-risk factor for violence.
8. To further investigate **cruelty and neglect of children**, which has seen a small but significant increase in the borough.
9. With the increase in knife crime being driven by **knife-enabled robbery**, this is to be a priority for the next 12 months.

Introduction

- The Strategic Assessment is an analytical product, which gives an overview of the current and long-term issues affecting or likely to affect a specific area in regards to crime and anti-social behaviour (ASB)*.
 - It is used to make inferences and provide recommendations for prevention, intelligence, enforcement and reassurance priorities as well as the future partnership strategy.
 - It provides direction for the Safer Croydon Partnership in deploying resources efficiently to reduce crime and ASB in the borough.
 - The analysis is based on the **problem-oriented approach**, highlighted below, which views crime as a “problem” and not an individual incident and, therefore, the focus should be on the underlying causes of those problems and how to tackle them.
 - The problem-oriented approach is based on the routine activity theory that for crime to occur, three components are required: an offender to be present, a victim or target to be present and the absence of a suitable guardian. As well as this there is also the absence of two other “controllers” – for offenders these are known “handlers” (e.g. parents or teachers) and for the place this is known as the manager or place management which can be a person (e.g. a police officer) or better place management approaches (e.g. CCTV installation).
- To ensure the analysis is conducted thoroughly, it is done in accordance with what is known as the “5WH”, highlighted below. The crime data in this document covers the last five financial years up to the end of 2021/22.

• Page 175

A “problem-oriented” approach



The “5WH”

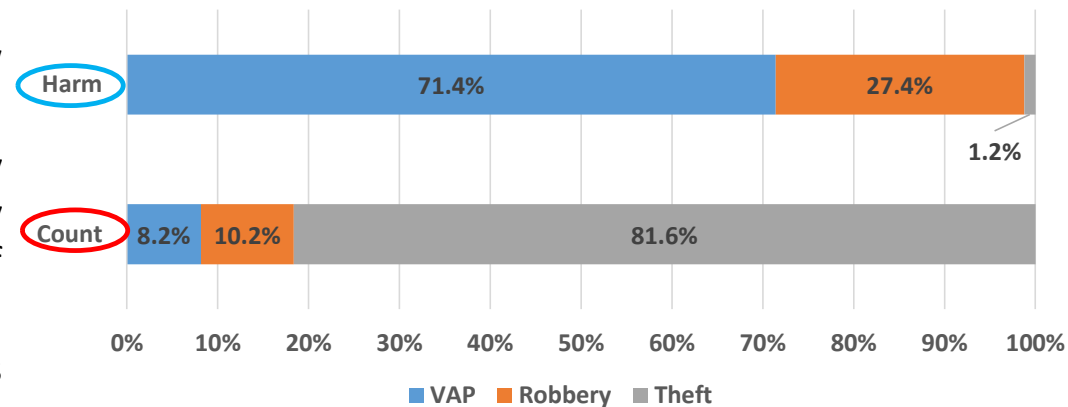
What is the Problem?	
Who is involved?	
When is it happening?	
Where is it happening?	
Why is it happening?	
How is it happening?	

*This year’s strategic assessment does not have a greater focus on ASB compared to previous ones for two main reasons. Firstly, the majority of covid-19 related calls (e.g. lack of social distancing, mask-wearing etc.) were recorded by the police as ASB calls so they have significantly distorted the statistics. Secondly, the analysis conducted in this document on hotspots etc. largely reflects ASB in the borough.

Measuring by Crime Harm

- Along with measuring by the count of offences (also known as the “volume” of offences), the Violence Reduction Network (VRN) also measures crime by harm using the Cambridge Crime Harm Index (CCHI).
- The CCHI is based on the principle that not all crimes are equal.
- Summing up all crimes by the count of offences only and measuring performance this way can be very misleading.
- Crime count means 1x shoplifting offence is as serious as 1x Grievous Bodily Harm (GBH).
- This leaves a demand for a meaningful measure of how harmful a crime is relative to other crimes.
- Multiplying each crime event in each crime category by the number of days in prison that crime of that category would attract if one offender were to be convicted of committing (not taking into account criminal history).
- This provides a weighted score which greater reflects the severity of the different types of crime.

Violence Against the Person (VAP)	Count	Harm Score
1x GBH with Intent	1	1460
1x Attempted Murder	1	3285
1x ABH	1	10
1x Common Assault	1	1
Total	4	4756
Robbery	Count	Harm Score
3x Personal Robbery	3	1095
2x Business Robbery	2	730
Total	5	1825
Theft	Count	Harm Score
40x Shoplifting	40	80
Total	40	80



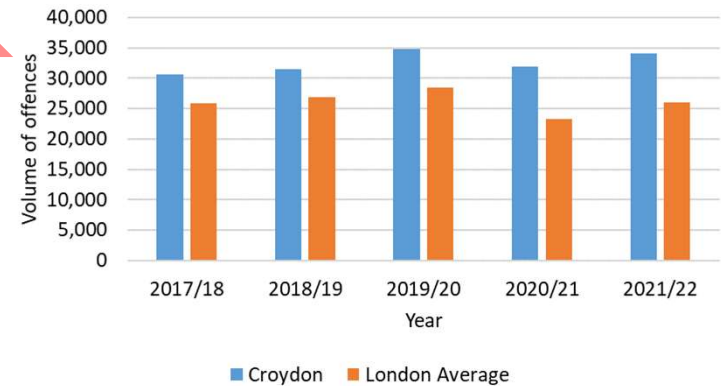
What is the problem?

The volume of crime in Croydon

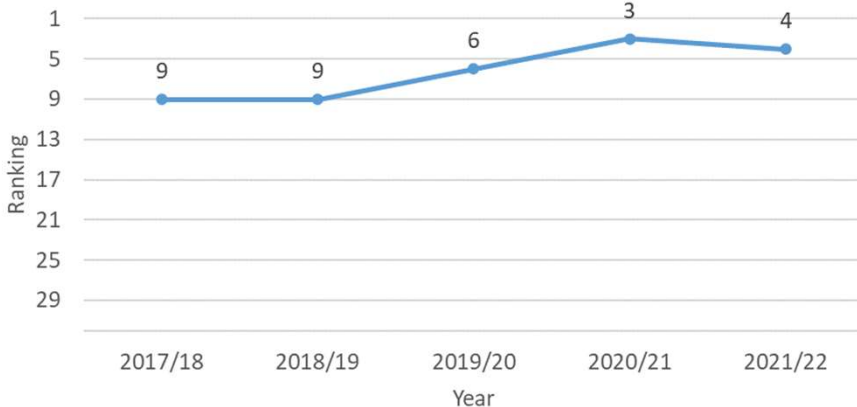
- In 2021/22 there were 34,043 offences committed in Croydon. This is a 7% increase in crime compared to the year before. The London average* saw a 12% increase.
- However, the increases are partly due to in the year before (2020/21), where there was a national and city-wide decrease in crime which is due to the Covid-19 pandemic and the subsequent government-imposed restrictions on people's everyday lives.
- 2021/22 was the second highest year in the last five years for the volume of offences in Croydon, whereas for the London average it was the third highest.

7%
Increase
in crime
volume in
Croydon
in
2021/22

Crime volume in Croydon and the London Average in the last five years



Croydon ranking for crime volume out of 32 London boroughs in the last five years



- Comparing 2021/22 to the pre-covid year (2019/20)** the last full year without imposed restrictions, there was a 2% decrease in crime in Croydon compared to 9% decrease in London.
- In 2020/21 Croydon was ranked third highest borough in London for volume of offences in London, which was its highest ranking over the last five years.
- In 2021/22, the borough reached its second highest ranking in the last five years by being the borough with the fourth highest volume of offences in London.

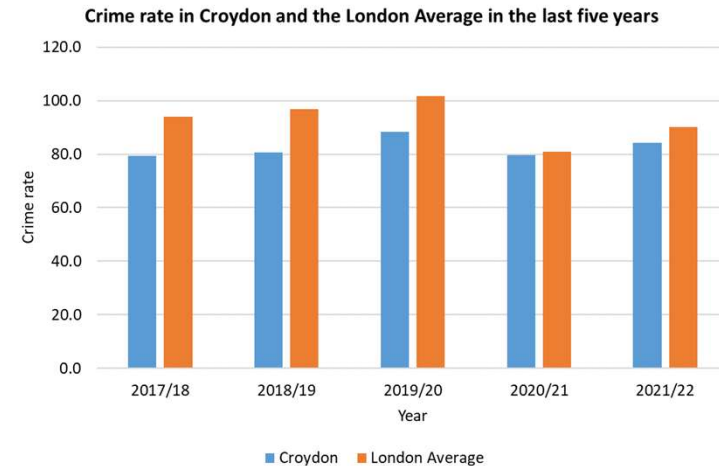
*This is the average London borough out of all 32 boroughs.

**The first lockdown was announced on 23rd March 2020 but as this was the last week of the financial year, 2019/20 is still referred to as the "pre-covid year".

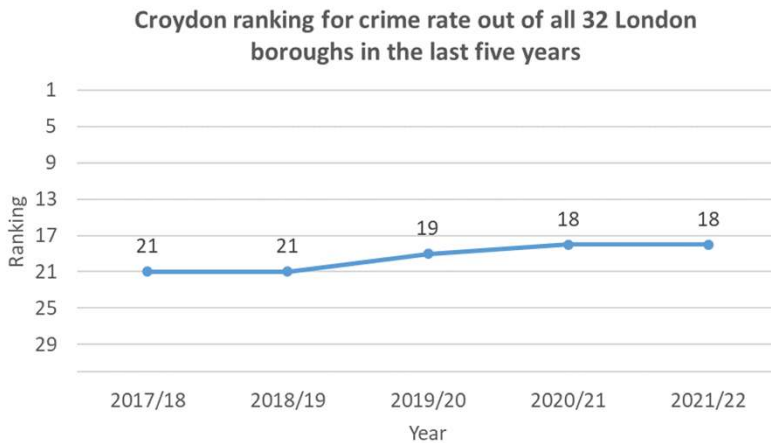
The crime rate in Croydon

- According to housing-led projection by the Greater London Authority*, in 2022 Croydon has the highest resident population in London. Therefore, it is more accurate to look at the crime rate (volume of offences per 1,000 of the population) in the borough.
- In 2021/22 the crime rate in Croydon was 84.4, which was a 6% increase in the crime rate on the previous year compared to a crime rate of 90.2 for the London average, which was an 11% increase on the previous year.
- 2021/22 was the second highest year in the last five years for the crime rate in Croydon, whereas for the London average it was the fourth highest.

6%
Increase in the crime rate in Croydon in 2021/22



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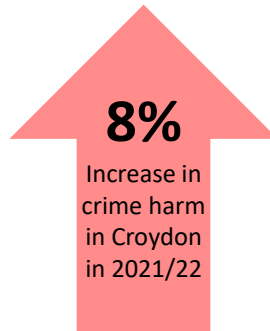


- Comparing 2021/22 to the pre-covid year (2019/20), there was a 4% decrease in crime compared to an 11% decrease in London.
- Croydon's crime rate ranking is significantly lower than its volume ranking, where it has been ranked 18th highest in the last two years. However, this is still the highest crime rate ranking in the last five years.
- The crime rate in Croydon is getting closer to the London average in the last two years. In the first three years of the five year period, the gap between the two rates was at 18%. However, in the last two years this has reduced to 4%.

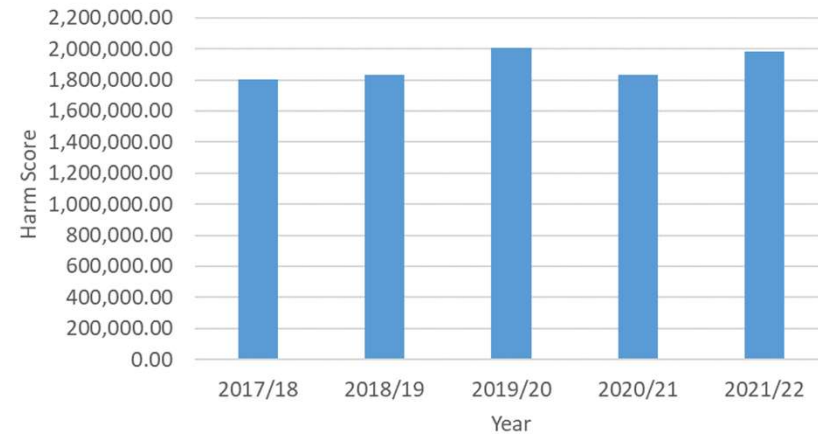
*Housing-led resident population projections can be found here: [GLA Population Projections \(london.gov.uk\)](https://www.london.gov.uk/press-releases/major/gla-population-projections)

Crime harm in Croydon

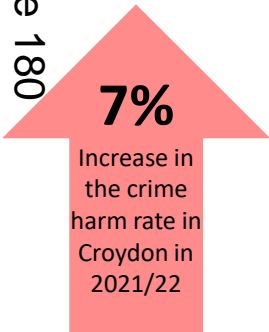
- Due to data collection restrictions, crime harm can only be calculated for Croydon.
- In 2021/22, crime harm was at its second highest it has been in the last five years in the borough.
- By comparing 2021/22 to the year before, crime harm has increased by 8%.
- However, by comparing 2021/22 to the pre-covid year (2019/20), crime harm has reduced by 1%.



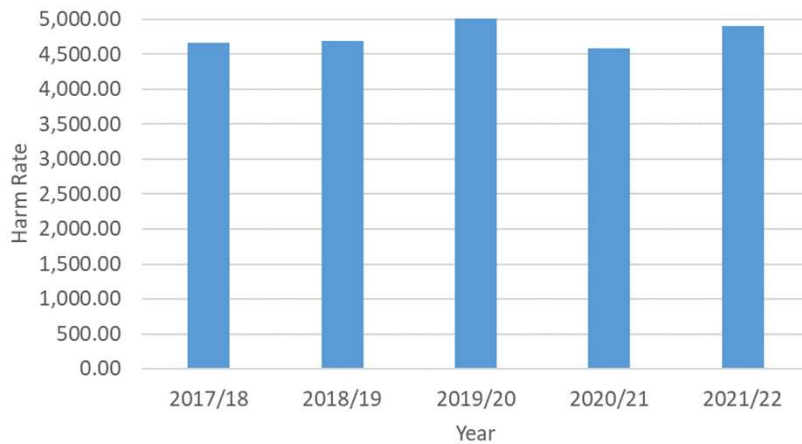
Crime harm in Croydon in the last five years



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Crime harm rate in Croydon in the last five years

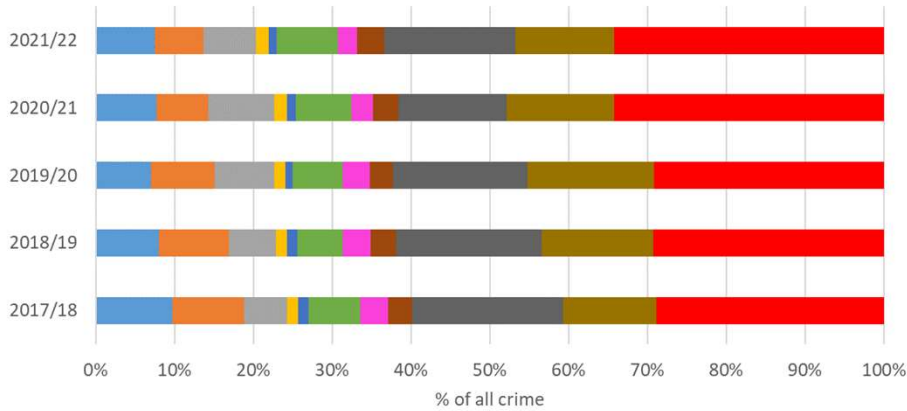


- The pattern of the crime harm rate in the borough closely reflects the volume of crime harm with 2021/22 being the second highest year in the last five years.
- By comparing 2021/22 to the year before, the crime harm rate has increased by 7%.
- However, by comparing 2021/22 to the pre-covid year (2019/20) the crime harm rate has reduced by 4%.

What is driving up crime volume in Croydon?

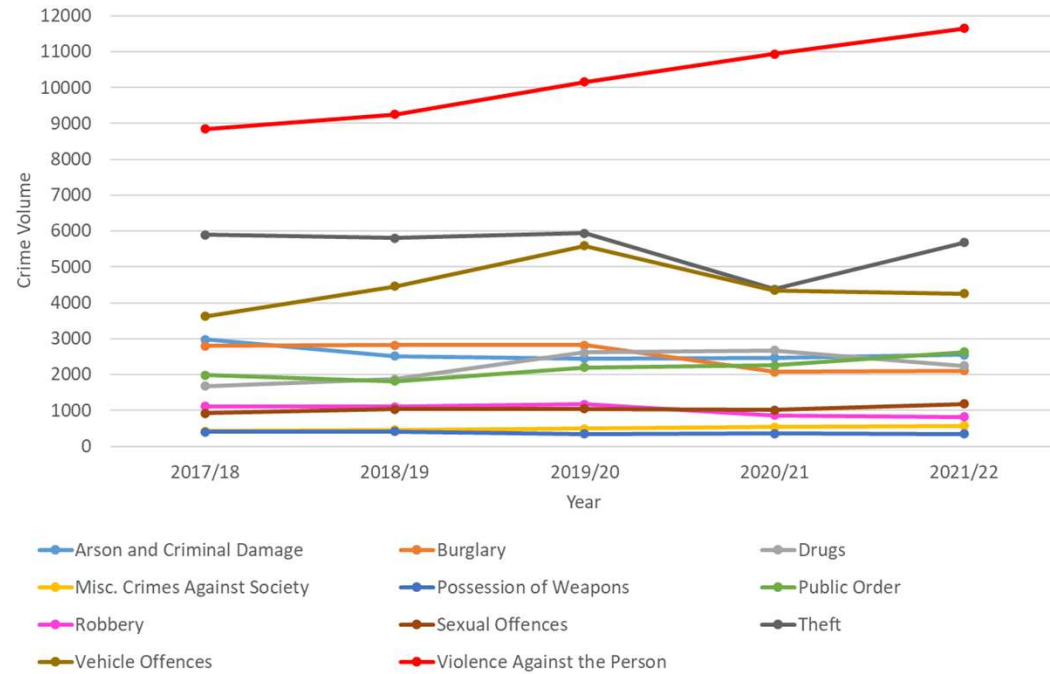
- Violence Against the Person (VAP) is the main driver for the rise in crime volume in the borough.
- Violence has increased consecutively over the last four years in Croydon.
- Over this time period, the average annual growth rate of the volume of VAP offences in the borough is 7%. For London it is 5%.

Proportion of crime volume in Croydon by type in the last five years



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Volume of crime in Croydon by type in the last five years

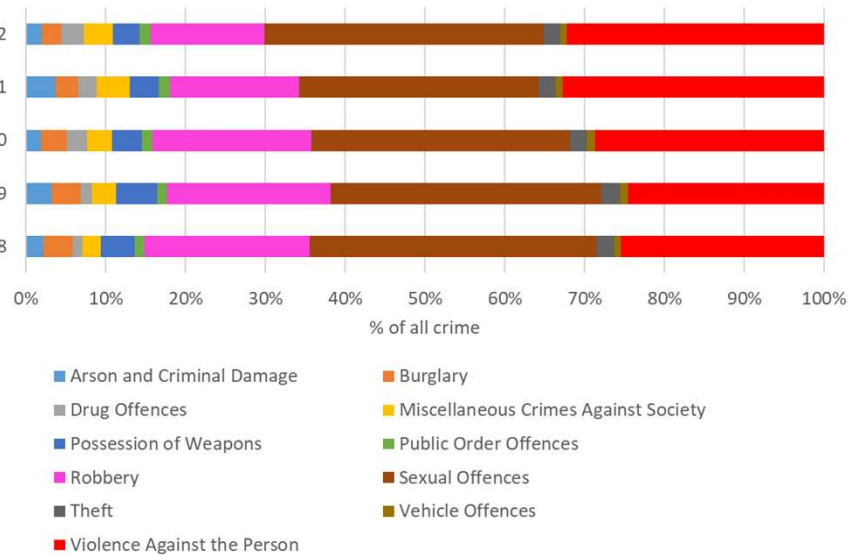


- Where the proportion of crime volume attributed to each crime type has remained stable over the last five years, VAP is the only crime type which has significantly increased its proportion over the last two years from 29% to 34%.

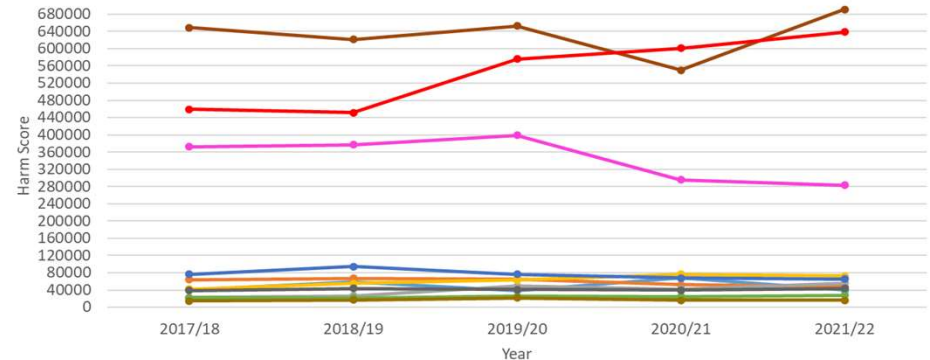
What is driving up crime harm in Croydon?

- Sexual offences are the main driver for crime harm in the borough closely followed by violence.
- Violent harm has increased consecutively over the last three years in Croydon.
- 2021/22 was the year where both sexual harm and violent harm was at its highest in the borough in the last five years.
- On average, sexual harm represents a third of all harm each year.

Proportion of crime harm in Croydon by type in the last five years



Crime harm in Croydon by type in the last five years



- Arson and Criminal Damage
- Burglary
- Drug Offences
- Miscellaneous Crimes Against Society
- Possession of Weapons
- Public Order Offences
- Robbery
- Sexual Offences
- Theft
- Vehicle Offences
- Violence Against the Person

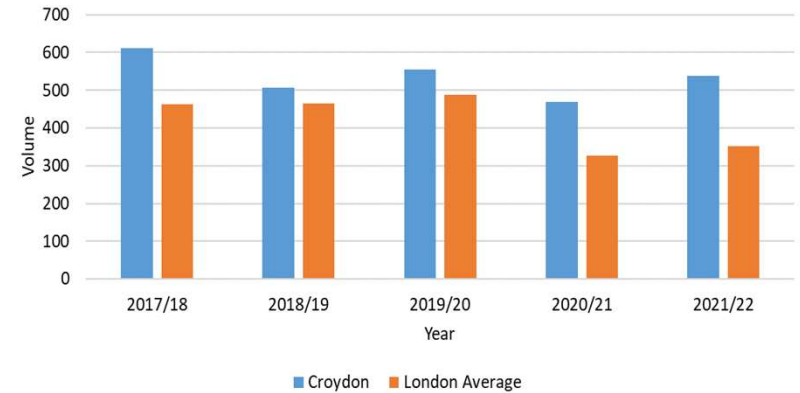
- Over the last five years, the proportion of all harm which is violent has increased steadily from representing a quarter to now representing just under a third of all harm.
- Due to the complex nature of the crime and separate detailed analysis being undertaken for the borough's Violence Against Women and Girls Strategy, further analysis of sexual offences will not be included in this document.

What about knife crime in Croydon?

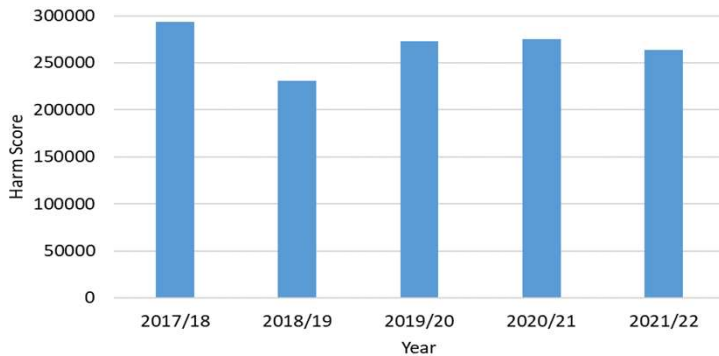
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- There is a large public focus on knife crime in London and particularly Croydon which had the highest number of teenage knife-related murders in London during 2021 (five out of 30 murders) and being referred to as “London’s knife crime capital”.
- Knife crime in Croydon went up by 14% in 2021/22 (compared to 7% for the London average). In regards to volume, Croydon it is ranked 5th highest in London – the highest it’s been in five years.
- Knife-enabled robbery (excluding domestic abuse) is predominantly driving up knife crime volume in the borough in 2021/22 with an increase of 27% compared to the year before.
- The knife crime rate shows a similar pattern but with a ranking of 12th across London in 2021/22 – still the highest rate in the last five years.
- Knife crime harm has decreased consecutively in the last two years where in 2021/22 it was at its second lowest in the last five years.
- In 2021/22 knife crime harm decreased by 4% and compared to 2019/20 it has decreased by 3%.
- Knife injuries from London Ambulance and A&E attendances for knife/sharp injuries both show a decrease for the last two consecutive years. In 2021/22 LAS callouts were the lowest in five years and the third lowest for A&E attendances.
- In 2021/22 LAS callouts fell by 26% compared to the year before and by 27% compared to 2019/20.
- In 2021/22 A&E attendances fell by 31% compared to the year before and by 41% compared to 2019/20.

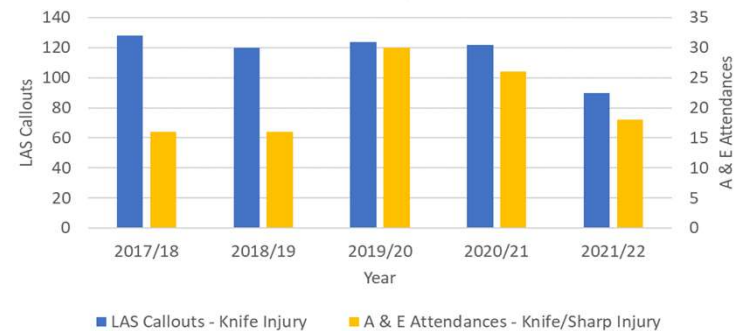
Volume of knife crime offences in Croydon and the London Average in the last five years



Knife Crime harm in Croydon in the last five years

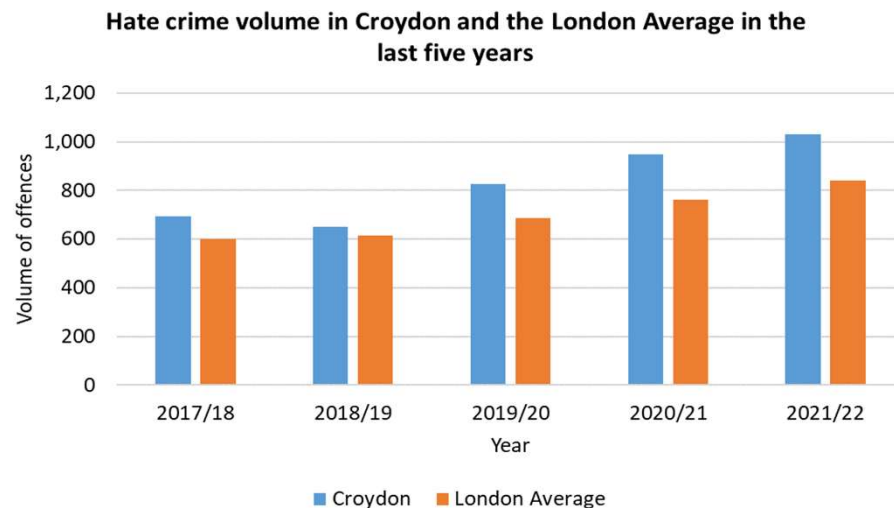


Knife-related LAS Callouts and A&E Attendances in Croydon in the last five years

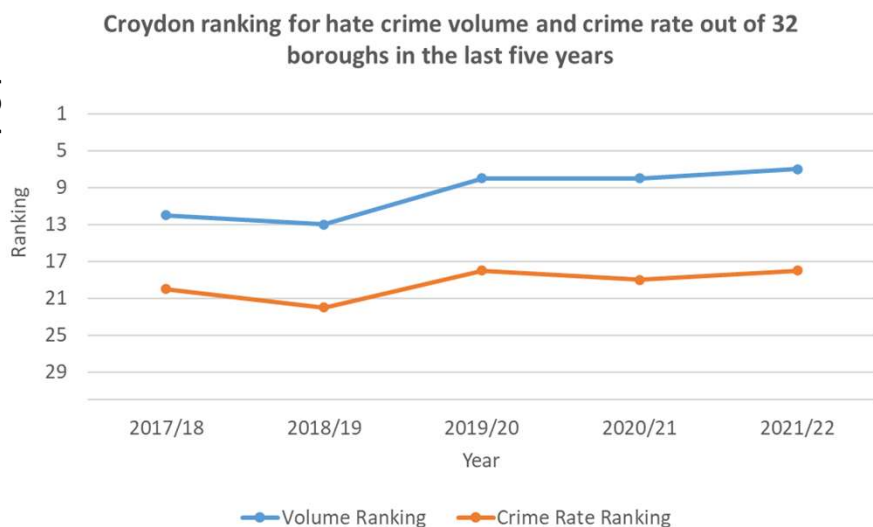


What about hate crime in Croydon?

- One of the priorities of past and present community safety strategies in Croydon is the focus on reducing hate crime, therefore, it is of vital importance to firstly identify the levels and types of hate crime in the borough.
- Hate crime has gone up both in Croydon and London for three consecutive years. In 2021/22 hate crime went up by 9% in Croydon whereas the London Average saw an increase of 11%.
- By comparing 2021/22 to the pre-covid year (2019/20), hate crime has increased by a quarter for both Croydon and the London Average.



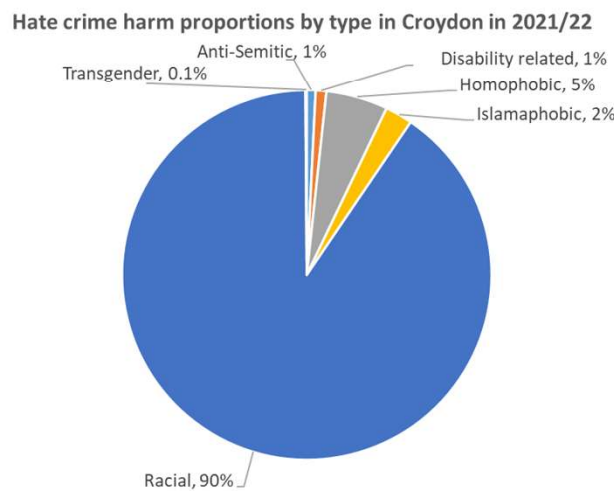
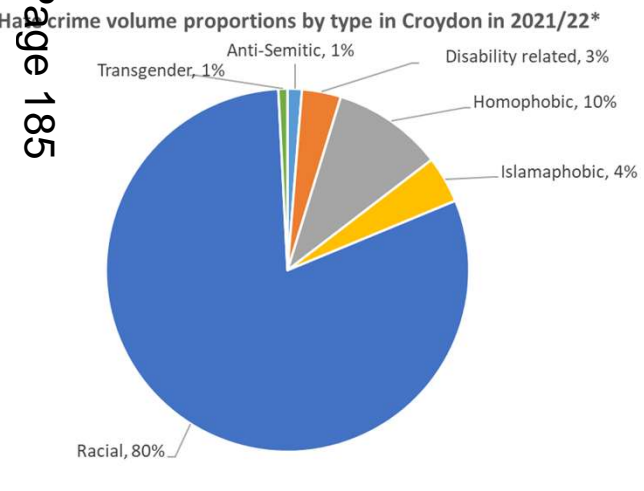
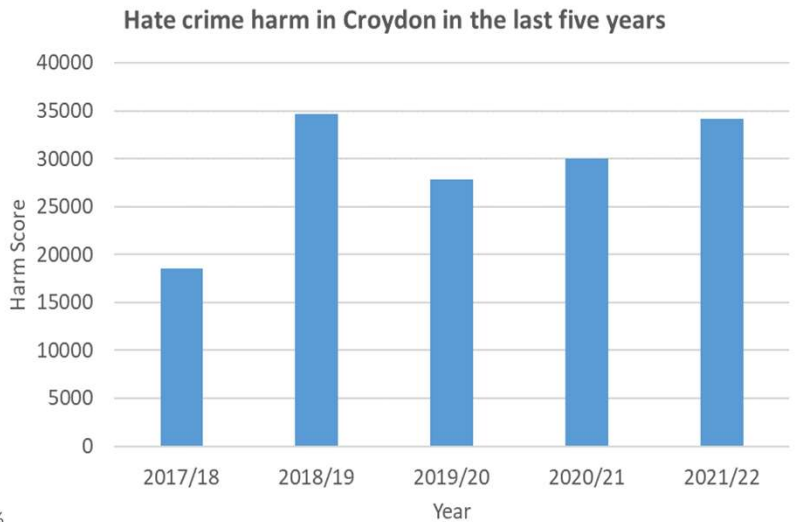
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- The hate crime rate follows a similar pattern to what is shown for hate crime volume.
- In 2021/22, Croydon's hate crime volume ranking was at its highest in the last five years at 7th across London
- For the hate crime rate, Croydon's ranking was at its joint highest in 2021/22 along with the pre-covid year (2019/20) at 18th across London.

What about hate crime in Croydon (cont.)?

- Hate crime harm in the borough has gone up consecutively in the last three years where it has reached its second highest in the last five years.
- In 2021/22 hate crime harm went up by 14% in Croydon and compared to the pre-covid year (2019/20) it has gone up by 23%.
- On average each year, the main crime type of hate crime which is committed are public order offences with almost 60% of crimes being of this category.
- The second highest proportion are violence against the person offences which, on average each year, just over a third of offences being of this category.



- Racial hate crime made up 80% of hate crime volume in Croydon in 2021/22. The second highest proportion is homophobic hate crime, making up 10% of all volume.
- Racial hate crime made up 90% of harm in Croydon in 2021/22, followed by homophobic hate crime with 5%.

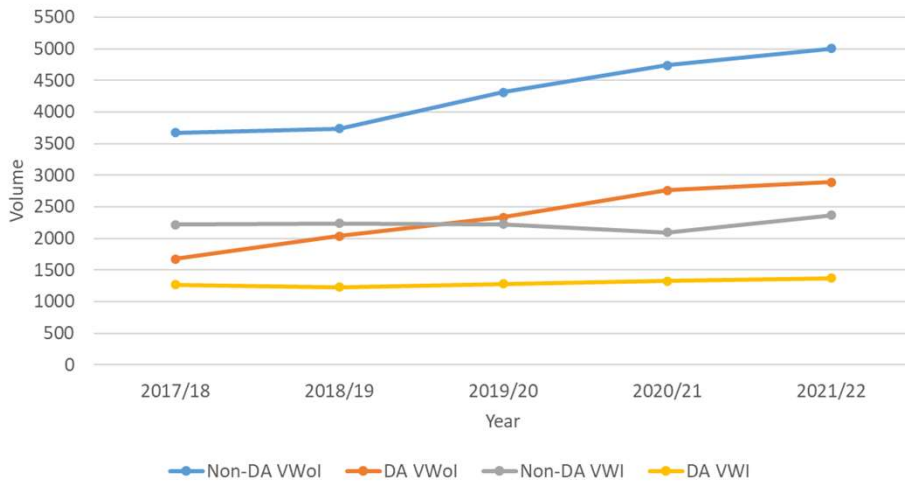
*As highlighted by the Metropolitan Police, hate crime types can “overlap”, therefore, these proportions should be treated as indicative only.

How is it happening?

How is the volume of violence going up in Croydon?

- There are three main categories under VAP: Homicide*, Violence without Injury (VWol) and Violence with Injury (VWI).
- On average each year, around 65% of all VAP offences are VWol.
- In 2021/22, VWI increased by 5% and VWol increased by 9%. Compared to the pre-covid year (2019/20) VWI increased by 7% and VWol increased by 19%.
- Both domestic (DA) and non-domestic (non-DA) VWol offences have significantly increased over the last five years, driving the volume of violence in the borough.
- On average, each year, non-DA VWol represents around 65% of all VWol offences.

Volume of DA and Non-DA Violence without Injury (VWol) and Violence with Injury (VWI) offences in Croydon in the last five years



5%
Increase in VWI in Croydon in 2021/22

9%
Increase in VWol in Croydon in 2021/22

13%
Increase in Non-DA VWI in Croydon in 2021/22

3%
Increase in DA VWI in Croydon in 2021/22

6%
Increase in Non-DA VWol in Croydon in 2021/22

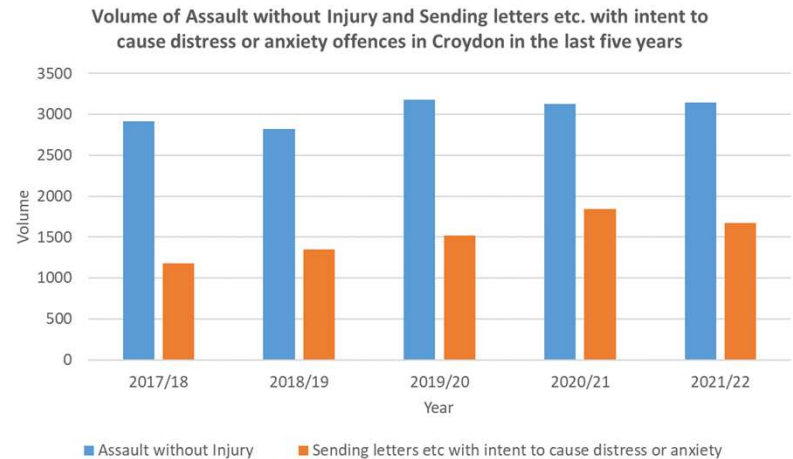
5%
Increase in DA VWol in Croydon in 2021/22

- There have been incremental increases in both domestic and non-domestic VWI offences in 2021/22.
- A relatively large 13% increase in non-DA VWI offences in 2021/22 is mainly due to a sudden dip in offences in 2020/21, predominantly due to government restrictions as a result of the Covid-19 pandemic.

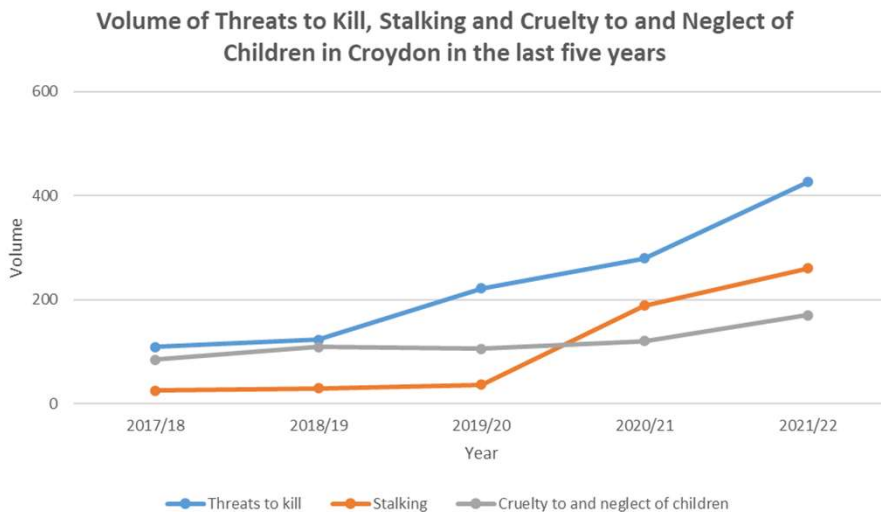
*Homicides represent on average each year around 0.1% of all VAP offences and 6% of all violent harm in the borough, therefore, as they are relatively low figures they are not shown here.

How is the volume of violence going up in Croydon (cont.)?

- Assault without injury (which is made up mainly of common assault and ABH) is the main crime committed under VWol, with this offence representing on average around half of all VWol offences each year.
- Assault without injury offences have remained fairly stable over the last three years. Around a third of these offences are flagged as domestic abuse (DA).
- In 2020/21 of the pandemic the crime “sending letters etc. with intent to cause distress and anxiety” (this includes electronic communications) – also referred to as “malicious communications” in this document - increased by 20%. In 2021/22 it decreased by 6% but is still the second highest in five years, representing around a quarter of all VWol offences. Almost half of these offences are domestic-flagged every year.



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- There are also a number of relatively “low volume” crime types where there have been significant increases.
- There has been a year-on-year increase of Threats to Kill with it going up by 25% during the first year of the pandemic and a further 54% last year. In 2017/18 it represented 2% of all VWol offences where it has continually increased to represent 7% last year. Almost half of offences each year are domestic which is fairly stable.
- Stalking has also seen significant continual increases over the last two years. In the first year of the pandemic it went up over 400% compared to the year before. Last year it went up a further 38%. In 2017/18 it represented only 1% of all VWol offences but in 2021/22 this rose to 4%. In 2017/18 60% of stalking offences were domestic – this has risen to over 80% in 2021/22.
- Cruelty to and neglect of children has also seen year-on-year increases with it going up 14% in the first year of the pandemic and a further 42% in 2021/22. Although it has consistently represented 2% of all VWol offences from 2017/18 to 2019/20, this rose to 3% last year.

How is violent harm going up in Croydon?

- On average each year, around 80% of all VAP harm is VWI.
- In 2021/22, VWI increased by 5% and VWol increased by 8%. Compared to the pre-covid year (2019/20) VWI increased by 16% and VWol increased by 14%.
- On average, every year, over 60% of all violent harm is non-DA VWI.
- Non-DA VWI has significantly increased over the five year period, only stabilising in 2021/22.
- DA VWI has fluctuated over the five period but reached its highest in 2021/22. It represents around 14% of all violent harm each year.

5%
Increase in
VWI harm in
Croydon in
2021/22

8%
Increase in
VWol harm
in Croydon
in 2021/22

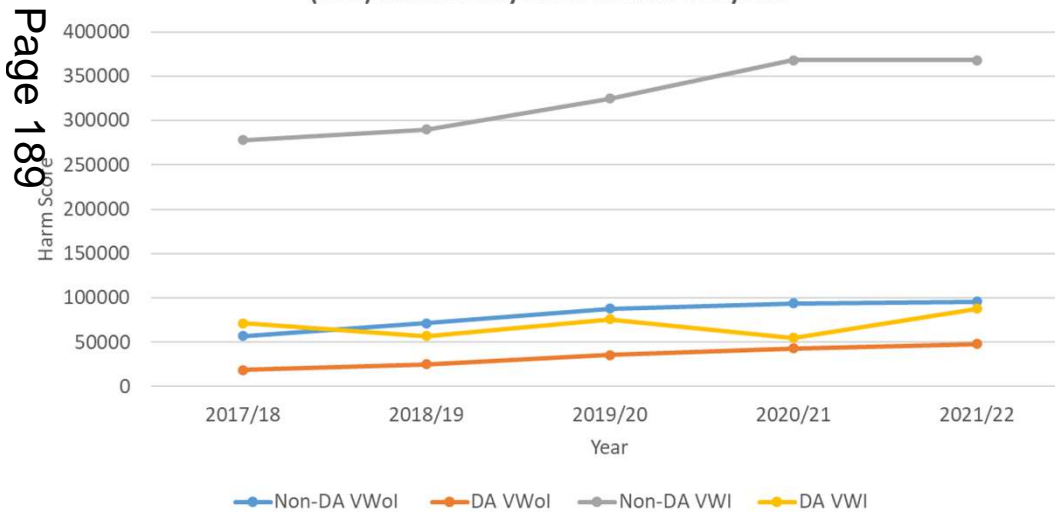
0%
Change in Non-DA
VWI in Croydon in
2021/22

60%
Increase in
DA VWI
harm in
Croydon in
2021/22

2%
Increase in
Non-DA
VWol harm
in Croydon
in 2021/22

11%
Increase in
DA VWol
harm in
Croydon in
2021/22

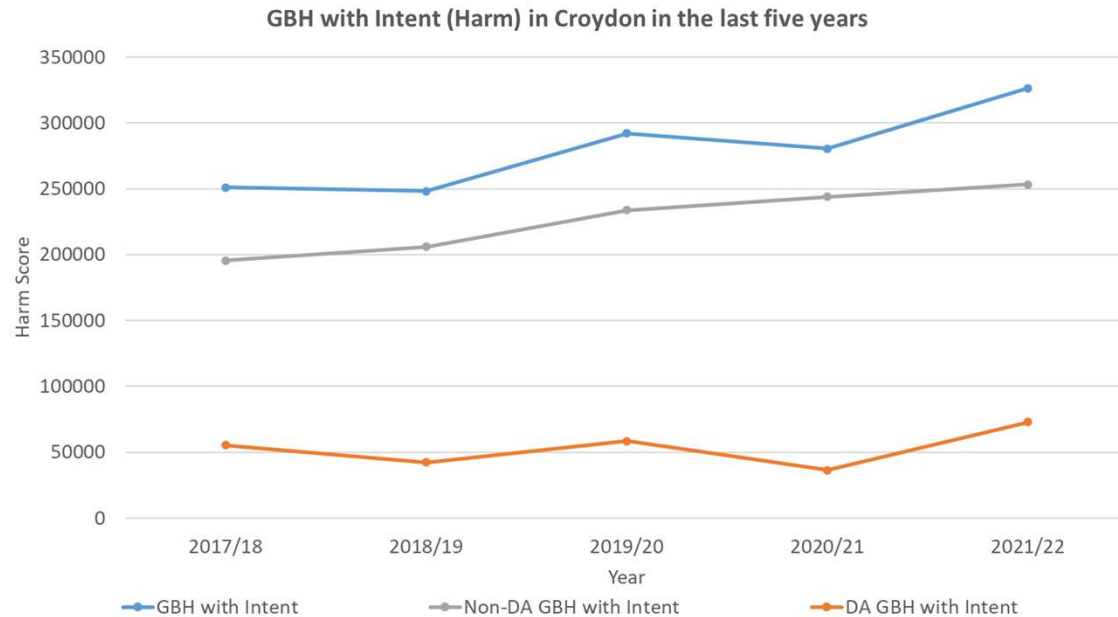
DA and Non-DA Violence without Injury (VWol) and Violence with Injury (VWI) harm in Croydon in the last five years



- Through the constant year-on-year increase in VWol offences, both non-DA and DA harm has almost doubled over the five year period.
- Non-DA VWol represents 16% and DA VWol represents 7% of all violent harm, on average, each year.

How is violent harm going up in Croydon? (cont.)

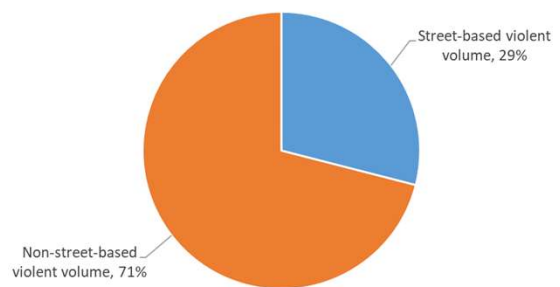
- The offence which on average each year represents just over half of all violent harm is “Grievous Bodily Harm (GBH) with Intent”.
- In 2021/22 harm from this offence increased by 16% compared to the year before. Compared to the pre-covid year (2019/20) it has gone up by 12%.
- Non-DA GBH with Intent has increased year-on-year in the last five years with it up 4% in 2021/22 compared to the year before and up 8% compared to the pre-covid year. On average, it makes up around 80% of GBH with Intent harm.
- DA GBH with Intent has been fairly stable up to 2021/22 where it reached its highest in the five year period after an increase of 100% compared to the year before. Compared to the pre-covid year it has increased by a quarter.



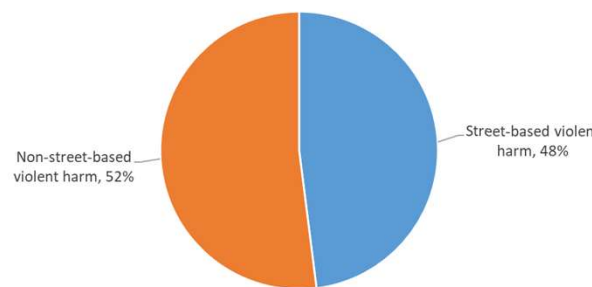
How is street-based violence going up in Croydon?

- Even though official statistics use non-domestic abuse violence with injury as a way to gauge street-based violence, they can still very much include offences which have happened in residential addresses, which still make up a significant proportion of offences.
- To accurately measure the level of street-based offences in the borough, crime data only showing violent offences which can occur in the public domain* is analysed.
- As shown in the top right, street-based violence represents almost a third of violent crime volume and almost half of all violent crime harm.
- As shown on the right, street-based violent crime volume and harm was at it's highest in 2021/22 over the last five years.
- Street-based volume and harm both increased by around a fifth in 2021/22 compared to the year before.
- Compared to the pre-covid year (2019/20), street-based violent crime volume increased by 8% and harm increased by 3%.

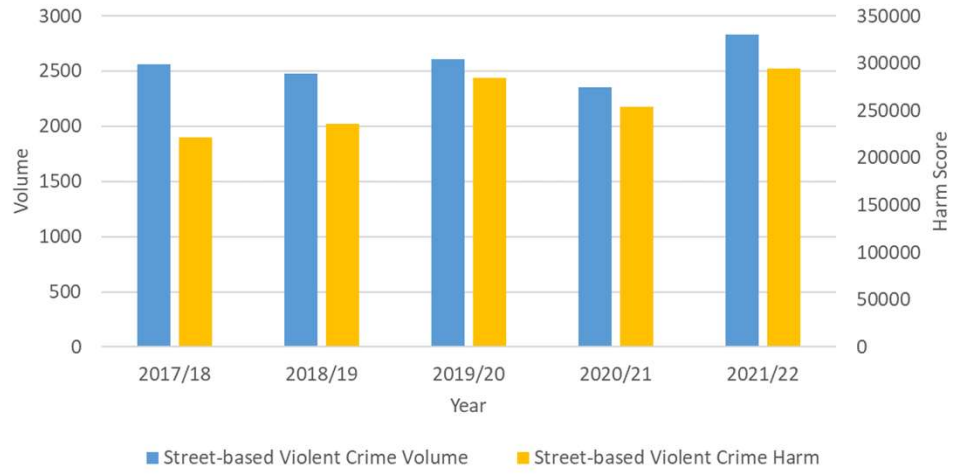
Average proportion of violent crime volume which is street-based and non-street-based each year over the last five years in Croydon



Average proportion of violent crime harm which is street-based and non-street-based each year over the last five years in Croydon



Street-based violent crime volume and harm in Croydon each year over the last five years

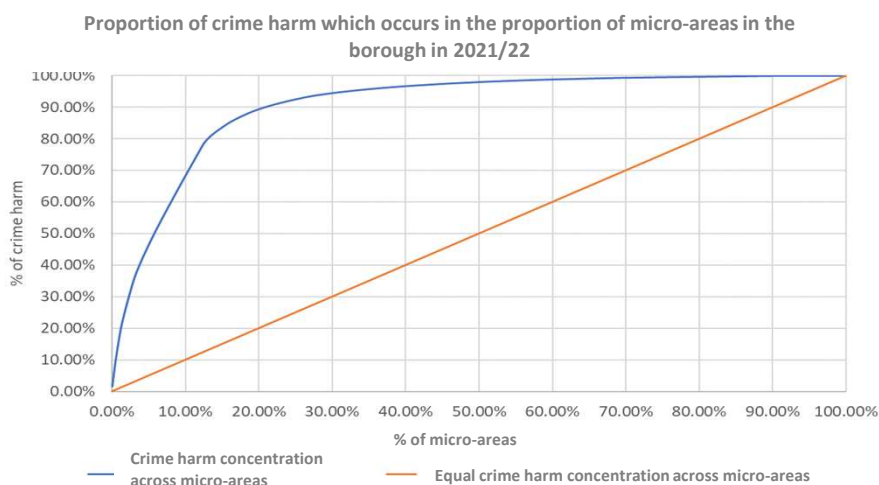
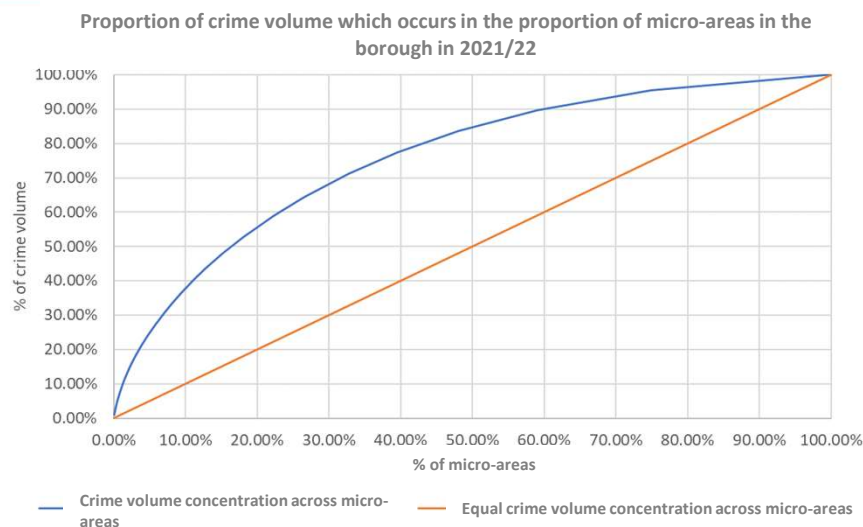


*These range from offences on the street to those in shops, parks and public transport. It must be noted that these statistics should not be used as "official" statistics but more of an indicator of the level of street-based violence in the borough.

Where is the problem?

Violent crime concentration by micro-area

- It must be emphasised that crime does not occur in random places or is evenly spread across the borough but rather it is highly concentrated in specific areas, even to a “micro” level.
- To show this, Croydon is equally divided up into micro-areas* which are around 150 metres long. A total of 3,617 micro-areas cover Croydon. Out of these, 47% had at least one violent crime committed in them in 2021/22.
- However, as shown on the right, out of those micro-areas where a crime was committed, around 10% of them contained almost 40% of the volume of crime committed.

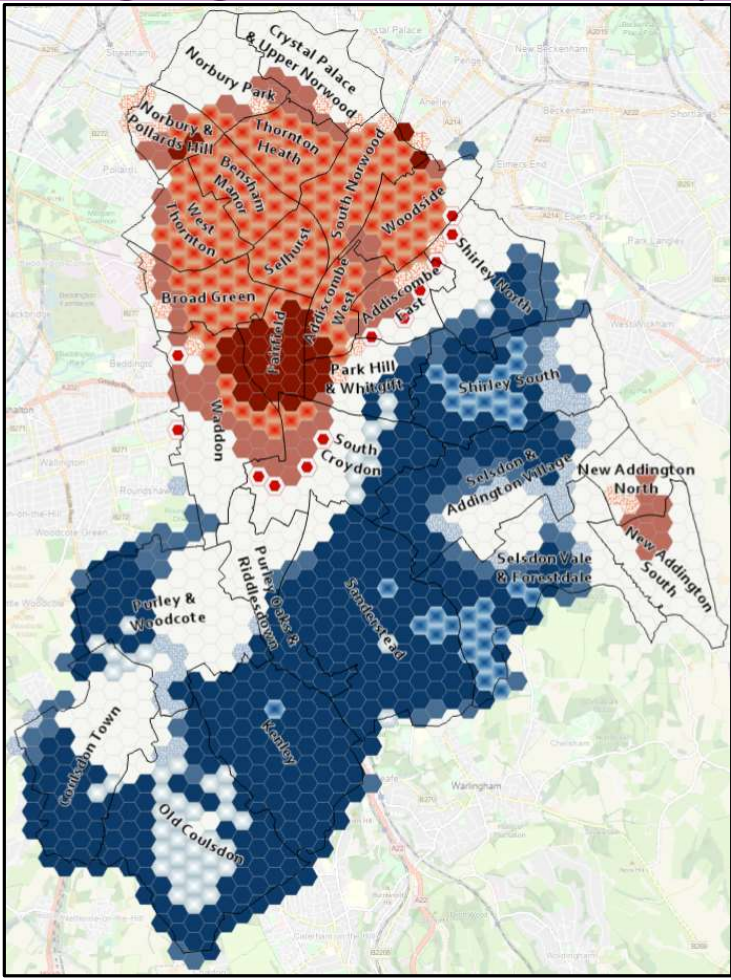





- For violent harm, as shown on the left, it is even more concentrated with 10% of micro-areas containing almost 70% of harm.
- With violent harm being significantly more concentrated than volume, it is deemed more effective to target resources in these areas, especially during times where services have been greatly reduced.

*To reduce sampling bias and represent patterns in the data more naturally, a hexagon grid is used rather than the traditional “fishnet” (or rectangular) grid.

The emerging hot and cold spots in the borough

- Analysis has been conducted to identify the areas where there are emerging hot spots and cold spots over the last five years.
- To provide an easier visual representation of this, 300m hexagons have been used.
- For each hexagon a set of ten equal “time-step intervals” of 6 months each are processed to determine the types of emerging hot and cold spots there are in the borough.
- It is clearly shown on the map on the right that violence is generally higher and intensifying in the north of the borough as opposed to the south, apart from New Addington.
- Surprisingly, the town centre is the primary persistent hotspot in the borough over the last five years.
- The map shows emerging hot spot and cold spots for violent crime volume but harm closely reflects the patterns shown.

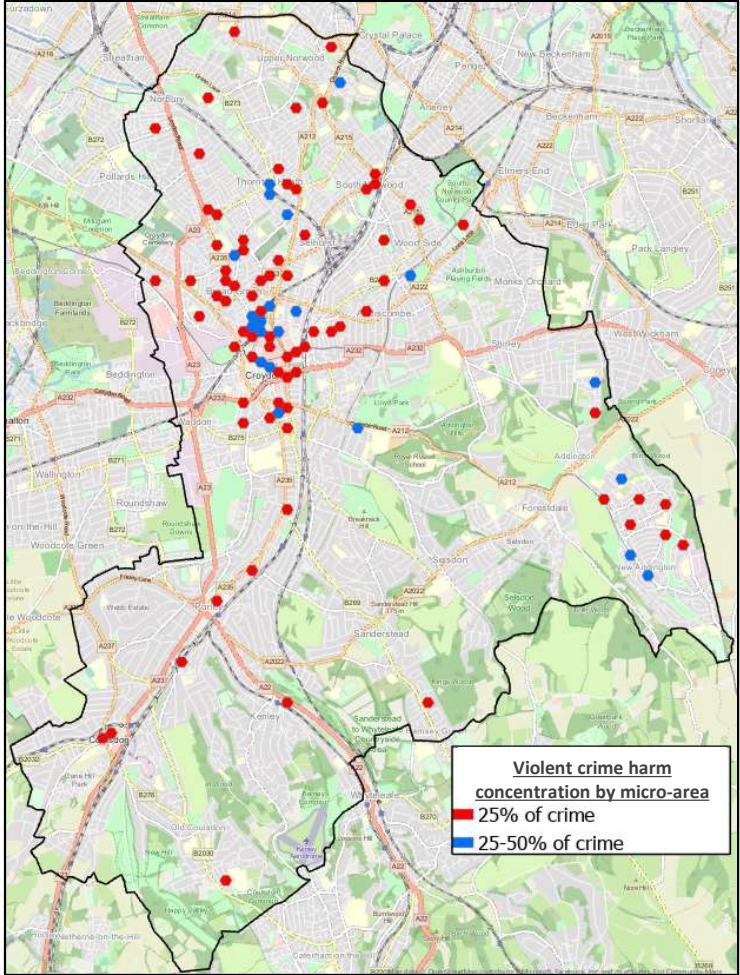
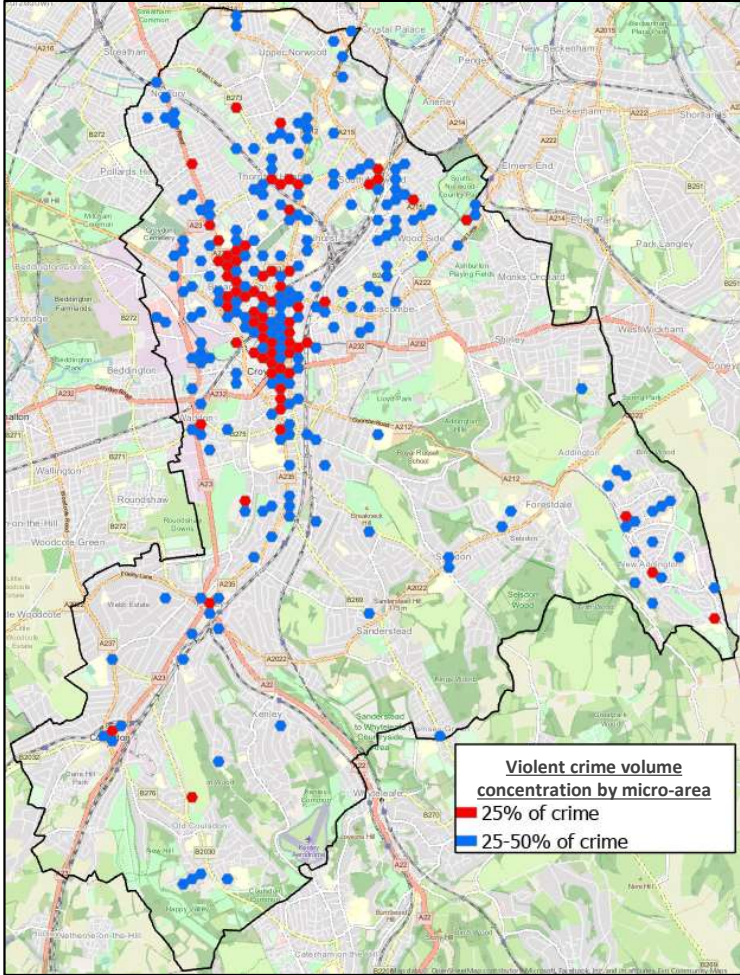


-  **New Hot Spot** - A location that is a statistically significant hot spot in the last 6 months and has not been statistically significant before.
-  **Persistent Hot Spot** - A location that is a statistically significant hot spot for 90% of the time period with no discernable trend indicating an increase or decrease in the intensity of crime clustering over time.
-  **Consecutive Hot Spot** - A location that is a statistically significant hot spot beyond the last 6 months but for less than 90% of the time period.
-  **Intensifying Hot Spot** - A location that has been a statistically significant hot spot and, in addition, the intensity of clustering of crime is increasing overall and that increase is statistically significant.
-  **Sporadic Hot Spot** - A location that is an on-again then off-again hot spot.
-  **Consecutive Cold Spot** - A location that is a statistically significant cold spot beyond the last 6 months but for less than 90% of the time period.
-  **Persistent Cold Spot** - A location that is a statistically significant cold spot for 90% of the time period with no discernable trend indicating an increase or decrease in the intensity of crime clustering over time.
-  **Diminishing Cold Spot** - A location that has been a statistically significant cold spot and, in addition, the intensity of the clustering of low crime is decreasing overall and that decrease is statistically significant.
-  **Intensifying Cold Spot** - A location that has been a statistically significant cold spot and, in addition, the intensity of clustering of crime is decreasing overall and that decrease is statistically significant.
-  **Sporadic Cold Spot** - A location that is an on-again then off-again cold spot.
-  **No Pattern Detected** – Does not fall into any hot or cold spot patterns.

The micro-areas which contain half of all violence

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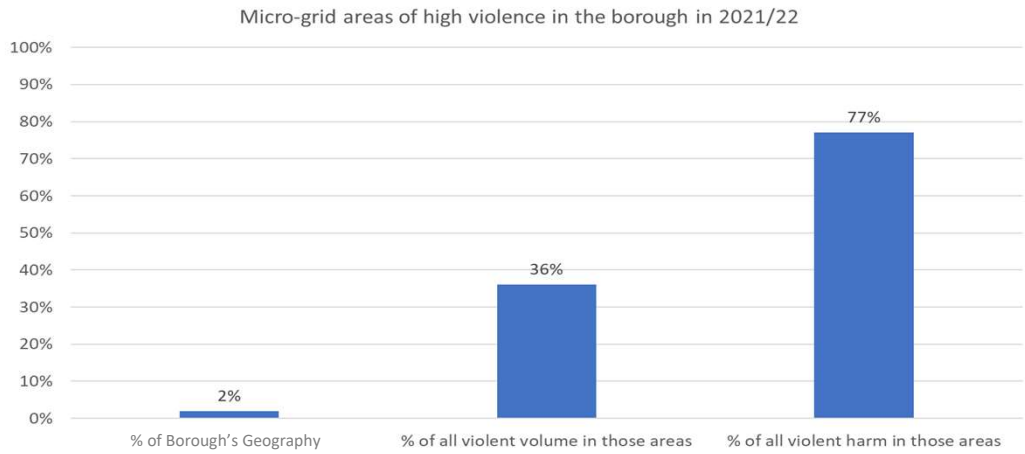
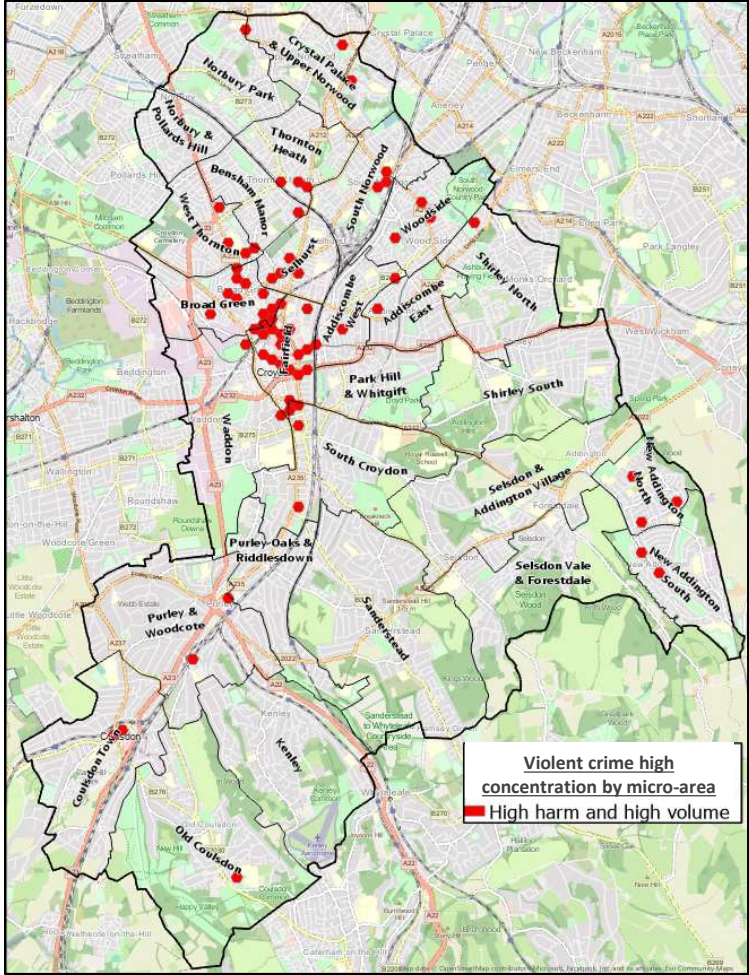
- A useful way to visualise the concentration of crime is by mapping the results by micro-area as shown on the right.
- The first map shows the micro-areas accounting for 25% and 50% of violent crime **volume** in the borough in 2021/22.
- The second map shows the micro-areas accounting for 25% and 50% of violent crime **harm** in the borough in 2021/22.
- As they clearly show when compared, there are significantly more micro-areas on the crime volume map than the crime harm map.
- However, especially in regards to the top 25% of violent crime, it is less clustered for harm compared to volume.



The “high volume high harm” micro-areas to target

- The areas to target in order to be most effective are the areas where high volume and high harm violence is occurring, which is shown on the map on the right.
- A total of 70 hexagons make up these high volume and high harm areas, accounting for 2% of the geographical area of the borough but over a third of all violent crime volume and over a three quarters of all violent crime harm.
- A high number of these areas also contain high volume and harm of other crimes of concern in the borough, specifically sexual offences and hate crime. It is these areas where resources should be targeted for maximum benefit.

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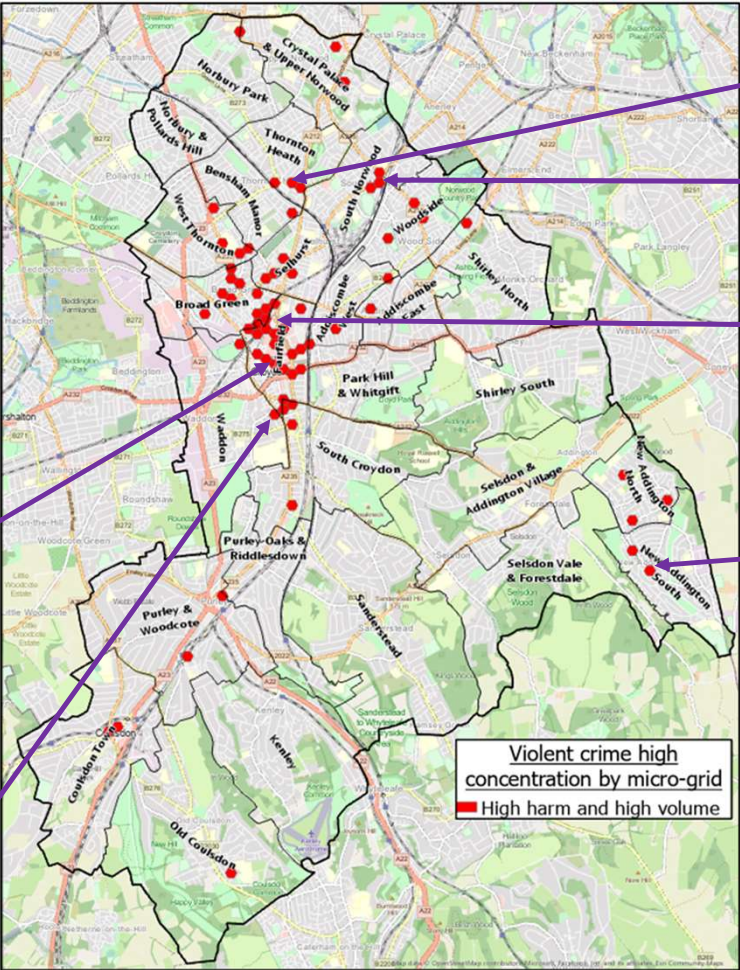
The “high volume high harm” micro-areas to target

- There are specific micro-grids and clusters of micro-grids of high volume and high harm violent crime where further targeting can be implemented. This is because they contain relatively disproportionate levels of violence and other crimes of concern.

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Croydon Town Centre, specifically High Street, Surrey Street and Church Street.

Croydon Town Centre, specifically South End.



Thornton Heath High Street

South Norwood High Street

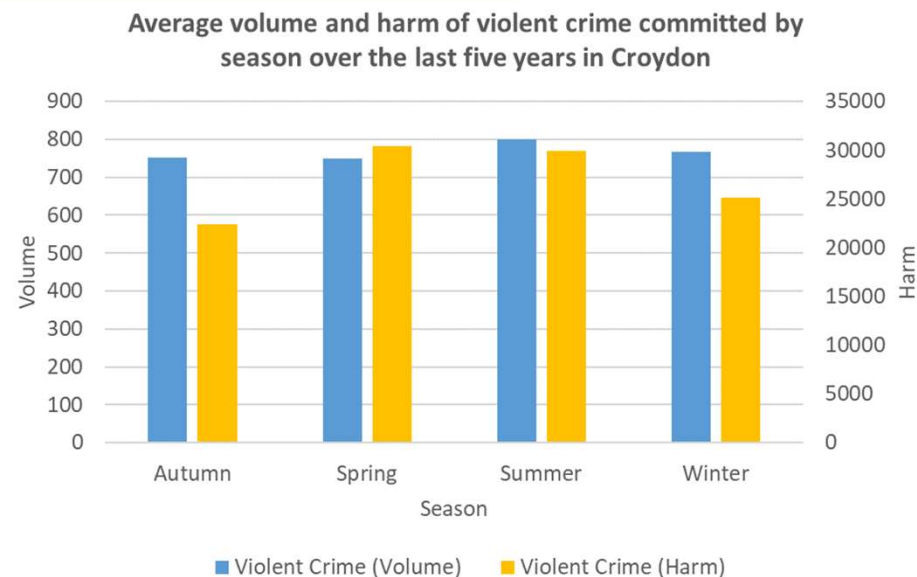
West Croydon/London Road

Central Parade

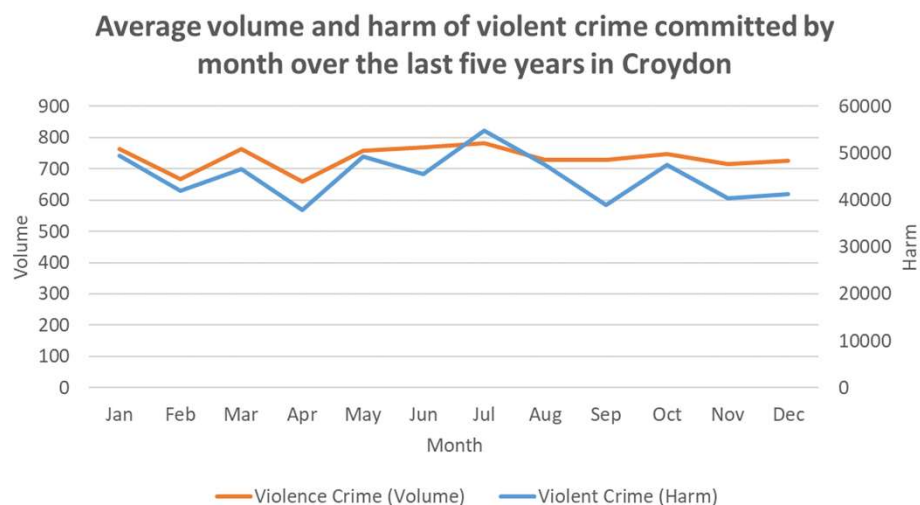
When is the problem?

Violent crime by season and month

- For when violent crime is committed by season, on average over the last five years, for volume it is spread quite evenly with the summer season (June – August) only slightly being the highest for offences.
- Violent harm shows a greater distinction with the spring (March - May) and summer being the seasons with the highest amount of violent harm being committed. This is due to an increase in high harm domestic and street-based violence.



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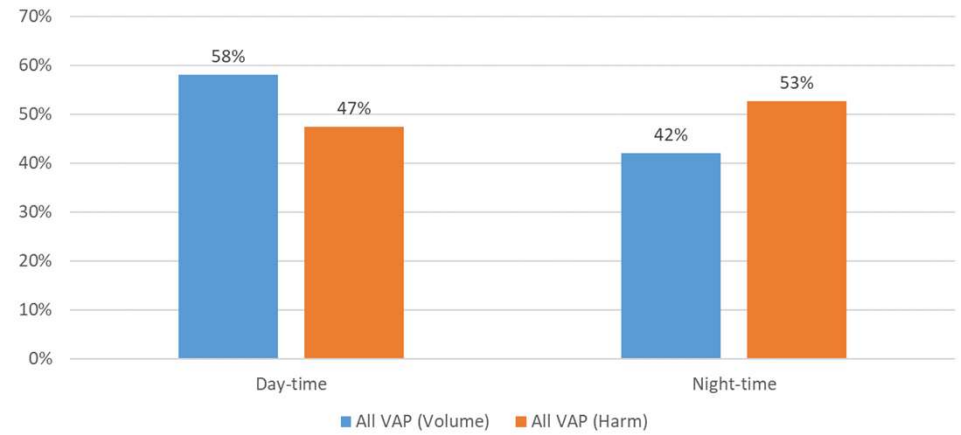


- The volume of violent crime being committed by month is fairly stable with it peaking in June and July.
- Violent harm shows a similar trend to volume but showing clearer rises and falls in harm being committed over the year. The peak month is shown as July.
- This pattern is closely reflected by specific types of violence including domestic violence and street-based violence.

Violent crime by day and time

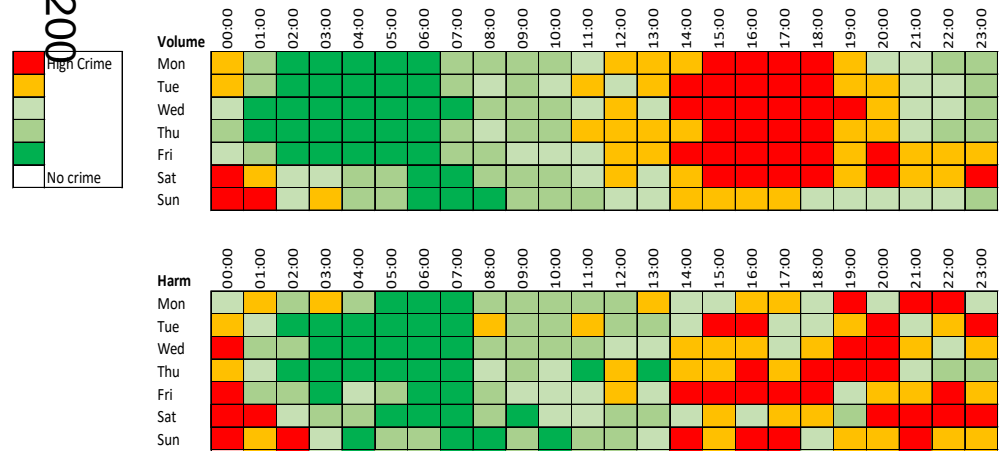
- There is slight contrast between volume and harm of violent crime when identifying the offence occurring during the day-time or the night-time.
- These times have been calculated by cross-referencing whether the time of offence occurred between sunset and sunrise or not during each specific month of the year.
- Almost 60% of the volume of violent crime is committed during the day-time whereas just over half of the harm is committed during the night-time.

Average % of violent crime committed during the day-time and night-time over the last five years in Croydon



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- Analysing the day and time of when violent offences occur show, for volume especially, that offences peak during the “after-school” hours on the weekdays linking a significant number of offences to young people.
- There are also peaks late afternoon on Saturday and after midnight on Saturday and Sunday morning, which are linked to the night-time economy.
- Violent harm is a lot more sporadic with it occurring throughout the week with a slight shift towards the evenings and early mornings, especially on the weekends.

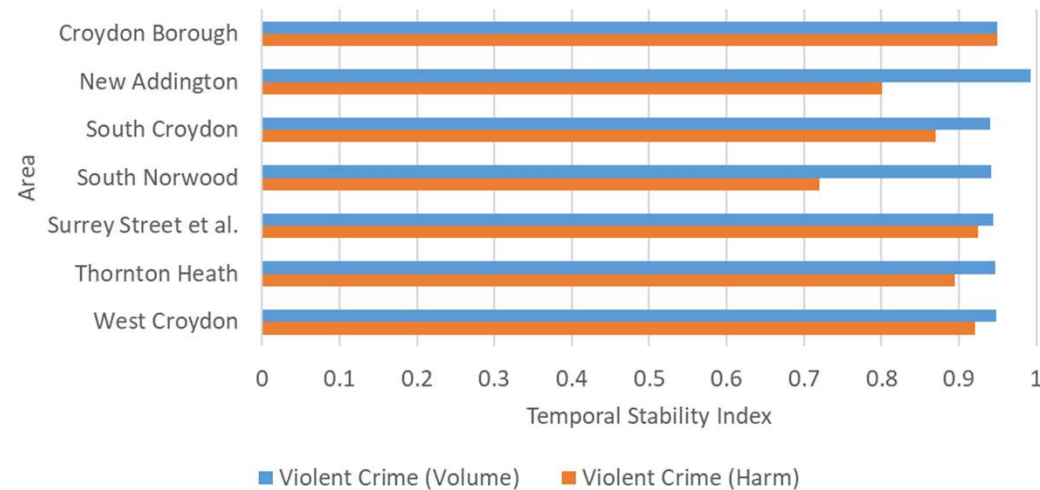


The Temporal Stability Index

- One way to measure the stability of crime patterns is by using a homogeneity index, which is used to summarise the distribution of data across nominal categories.
- The index used is called the *temporal stability index (TSI)*, where crime data for Croydon and each of the primary hotspots highlighted earlier has been split into equal temporal periods and is mathematically calculated to measure whether crime in the area is a result of offences occurring over a short period or crime has been stable over the long term.
- Violent crime volume and violent crime harm was taken in each area over the last five years, split into periods of three months.
- The TSI was then calculated and those areas which show a score above 0.85 suggests that violent crime volume and/or harm levels have been stable over the five year period.
- As shown in the chart on the right, this is true for both violent crime volume and harm for all areas apart from harm in New Addington and South Norwood which are showing relatively low TSIs.
- This means violent harm levels in these areas was not as stable over the five-year period and that it has fluctuated in certain shorter periods.

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Temporal stability index for Croydon and the primary hotspots over the last five years



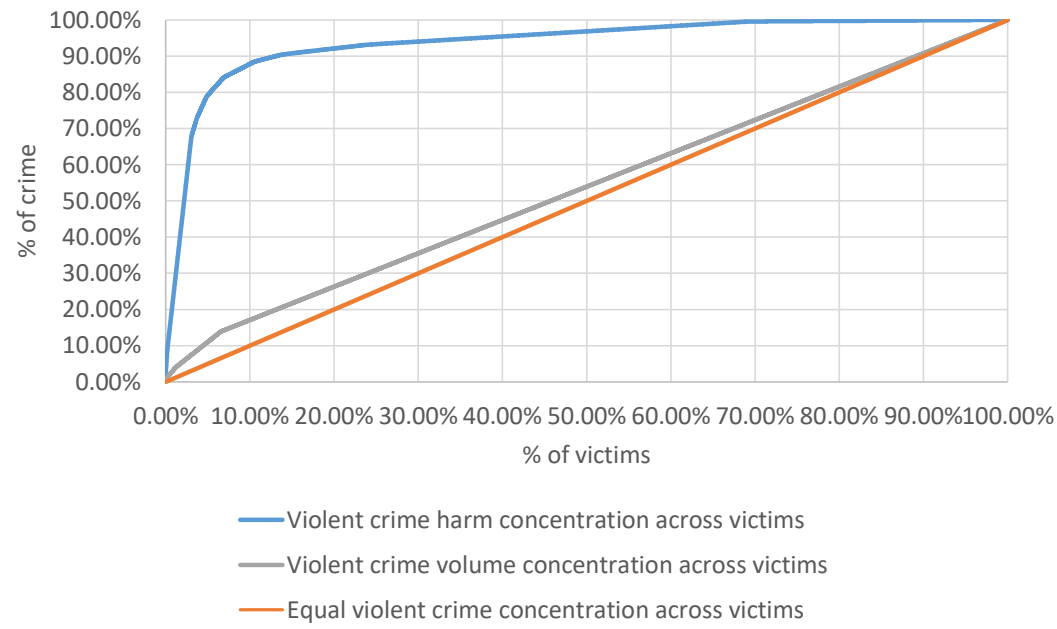
Who is involved?

The “felonious few” and victims of violence

- The implementation and the use of the Cambridge Crime Harm Index is pivotal in the analysis to focus on the “felonious few*”, which research shows that most crime, specifically crime harm, is committed by a small fraction of offenders against a small fraction of victims in a small fraction of locations.
- In many areas within many countries, there are relatively large sums of money spent on investing equal efforts in all offenders, victims and places which produce unequal results.
- The borough should instead refocus its limited resources on the “felonious few”, which could lead to an increased chance of crime reduction, particularly those targets which give rise to serious harm.
- This approach requires no extra costs and could even possibly reduce overall costs in the medium to long-term due to these persistent high harm targets no longer generate such serious crimes or, better still, no crime at all.

As shown below, 10% of victims of violent crime suffered almost 90% of all harm in 2021/22. For the same proportion of victims, less than 20% of the number of all violent offences were attributed to them.

Proportion of victims receiving the proportion of violent crime harm and volume in Croydon in 2021/22



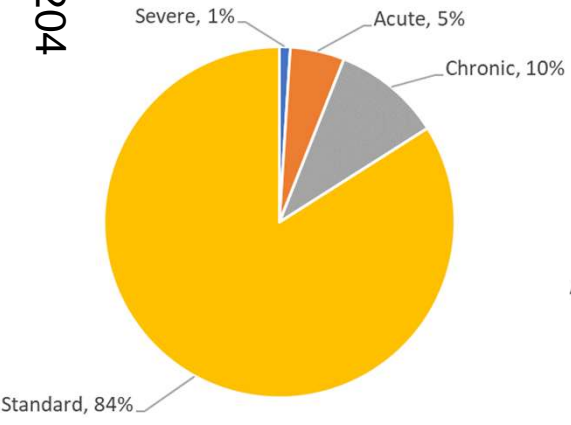
*The “Felonious Few” is more familiarly known as the “Power Few” but it has recently been replaced by the former, especially in regards to offenders, due to the justifiable argument that calling them this suggests they are deserving of praise or respect instead of them being labelled with a name that demanded condemnation for their high harmful crimes.

Violent harm classifications for victims of violence

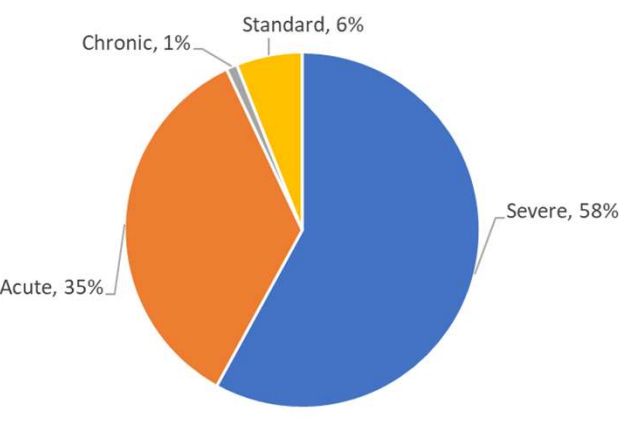
- Using both violent crime volume and harm, a simple model can be used to prioritise interventions for victims of violence. This is a 2 x 2 model shown on the right.
- As shown, each victim is assigned a classification based on the frequency of violence and severity of harm they have suffered.
- A repeat victim is shown as an individual who has been victimised more than once and an individual is of high severity if they receive a harm score greater than 100.
- These thresholds are arbitrary and can be amended to how agencies see fit.

Classification Matrix		Severity	
		Less than 100	More than 100
Frequency	Once	Standard	Acute
	Repeat	Chronic	Severe

Proportion of victims of violent crime volume by classification in the last five years



Proportion of victims of violent crime harm by classification in the last five years

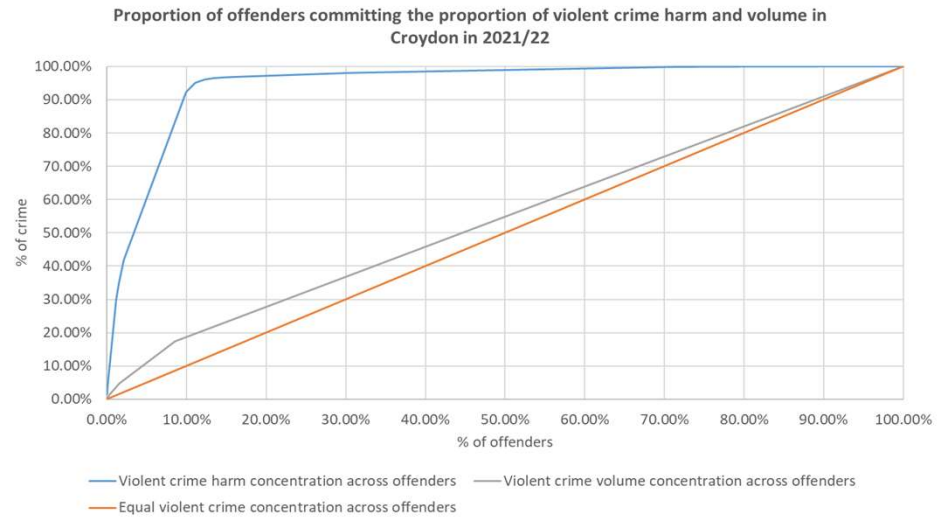


- As an example, using all named victims data of violence over the last five years, the chart on the far left shows that those classified as “Severe” represented 1% of the volume of violent offences but, as shown on the left, represented almost 60% of all violent harm.
- Looking at repeat victims alone, for volume of violent crime, there were ten times of those classified as “chronic” than there was those classified as “severe”. However, for crime harm, those classified as “severe” received 58 times more the amount of harm than those who were “chronic”.
- Therefore, it would deem more effective to target limited resources to those classified as “severe” than any other classification.

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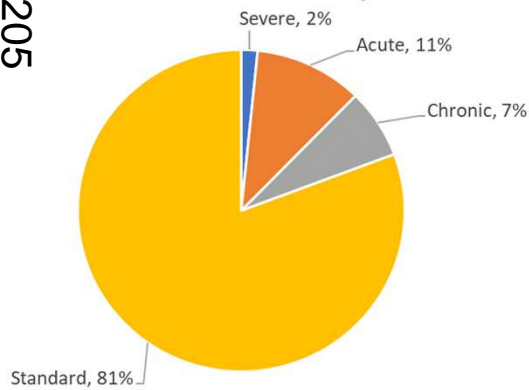
The “felonious few” and offenders of violence

- For offenders of violent crime, the chart on the right shows that over 10% of offenders committed over 90% of violent harm. This is a slightly higher proportion of violent harm attributed to offenders in comparison to victims.
- For the same proportion of offenders, slightly less than 20% of violent crime volume was attributed to them. This is around the same when compared to victims of violent crime.
- Again, even though this shows a greater incentive to invest and focus limited resources on offenders of high harm, it is more difficult to do this with offenders than victims if being directed by the 2 x 2 classification model.

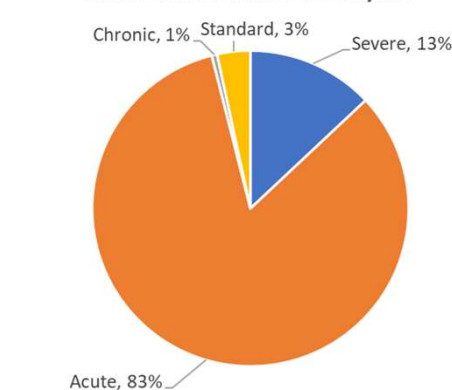


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Proportion of offenders of violent crime volume by classification in the last five years



Proportion of offenders of violent crime harm by classification in the last five years

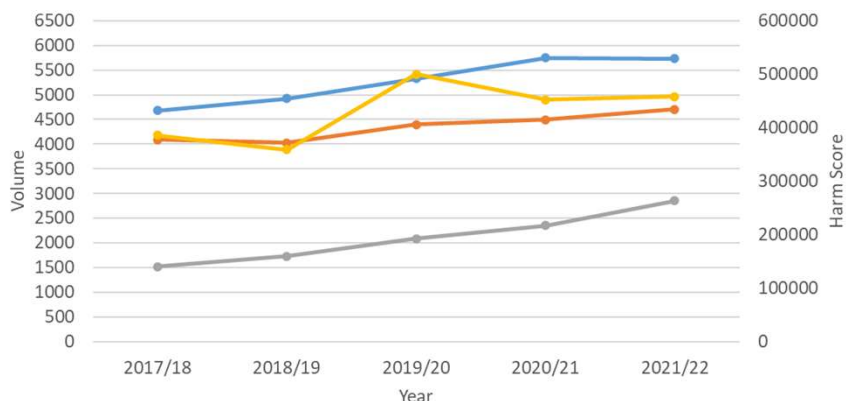


- As opposed to victims, using the 2 x 2 classification model on offenders shows that it is those classed as “acute” who cause the majority of harm rather than those classed as “severe”.
- This means that violent offenders are much more random, especially when it comes to high harm violence, meaning it makes them harder to target.
- However, it must be emphasised this can be down to several reasons including less offenders being charged (especially for domestic violence due to reluctance from the victim) and violent offenders being involved in other types of high harm crime outside of violence, therefore, this was not in the data analysed.

The sex of victims of violent crime

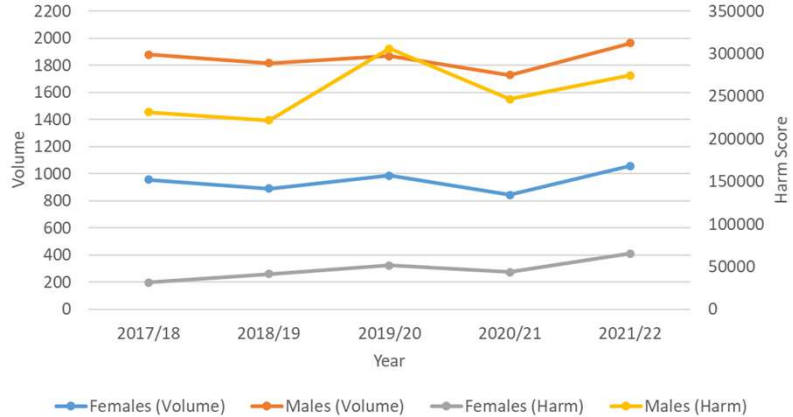
- On average, each year the victims of the volume of violent crime is around 55% female and 45% male. However, around 70% of violent harm is suffered by male victims.
- The number of female victims have increased on average by 7% year-on-year up to last year where it stabilised. The number of male victims followed a similar pattern but continued to rise last year to reach its highest in the last five years.
- The violent harm suffered by female victims has increased on average by 17% each year over the last four years.
- Reaching its peak in 2019/20, harm received by male victims fell by 9% in 2020/21 where it has stabilised in the last year.

Victims of violent crime volume and harm by sex each year in Croydon over the last five years



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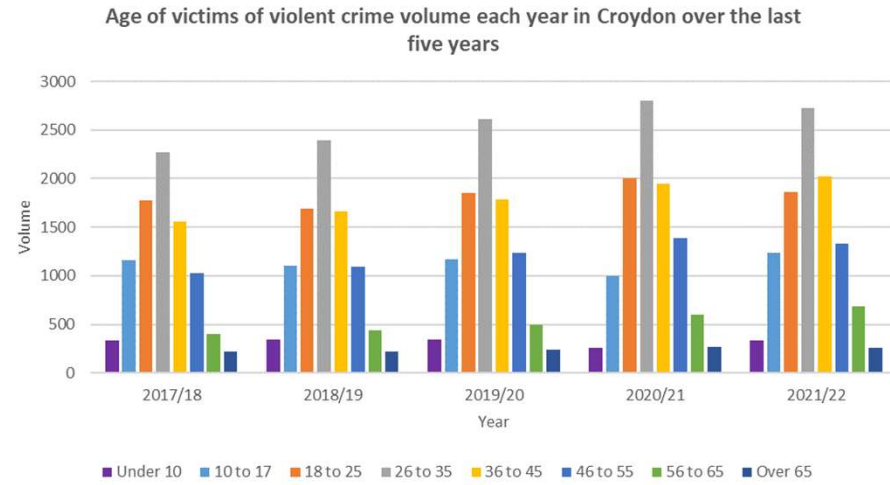
Victims of street-based violent crime volume and harm by sex each year in Croydon over the last five years



- It can be assumed that the main driver for females of violent crime is because of the rise of domestic violence, seeing that around 75% of victims are female and they suffer over 60% of harm.
- However, both the number of female victims and the harm they suffered from street-based violence was at its highest in 2021/22 in the last five years.
- Each year, on average, males still make up two thirds of victims of street-based violence and 85% of street-based violent harm.
- The number of male victims of street-based violence reached its peak in 2021/22 and this was the second highest for harm suffered by males too in the last 5 years.

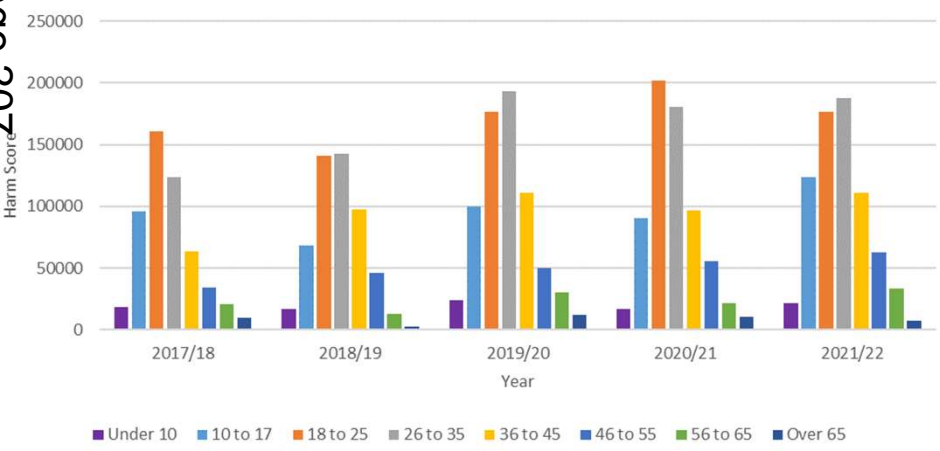
The age of victims of violent crime

- On average, each year the age category where the highest proportion of victims of violent crime are aged 26 to 35 years old, who represent around a quarter of all victims. This is the same for both domestic violence and street-based violence.
- There is a trend of an overall increase of those aged 26 to 35 years old over the last five years. Again, this is because of an increase of victims in this age category for both domestic violence and street-based violence.
- Last year was also the year for the highest number of victims who were aged 36 to 45 years old. This is also because of an increase of victims in this age category who have been victims of domestic violence and street-based violence.



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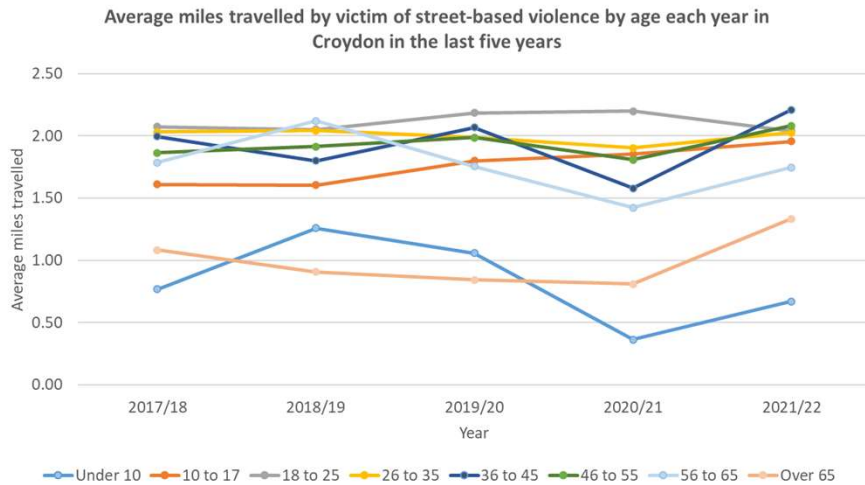
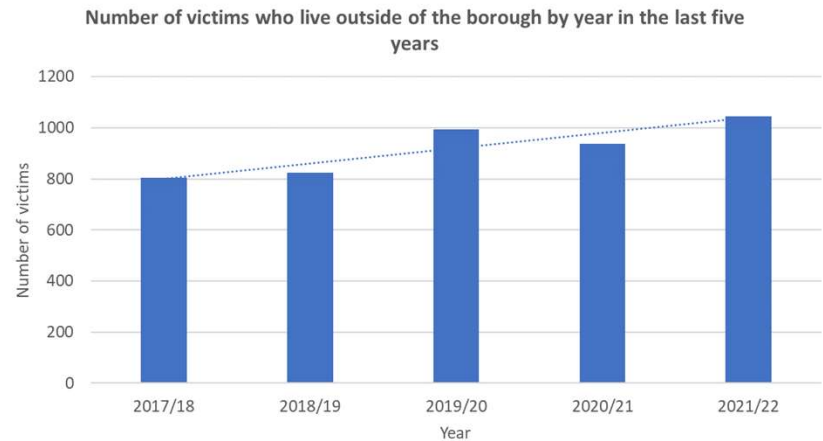
Age of victims of violent crime harm each year in Croydon over the last five years



- On average, each year the age category where the highest proportion of harm received by victims of violent crime are aged 18 to 25 years old and 26 to 35 years old, who represent around a quarter of all victims each. This is closely reflected for street-based violence.
- For domestic violence, those aged 26 to 35 years old represent around a third of harm each year and those aged 18 to 25 years represent around a quarter of harm.
- 2021/22 was the highest year for harm received by victims aged 10 to 17 years old in the last five years. This is linked to both an increase in harm in domestic violence and street-based violence.

Where victims live and their pattern of travel

- On average, each year around 12% of victims of violent crime live outside of the borough. These victims make up around 16% of violent harm each year. However, there is a general trend that the number of victims travelling from outside of the borough has been increasing over the last five years. There was a slight decrease in 2020/21 as a result of government-imposed restrictions due to the Covid-19 pandemic.
- In 2021/22 there was an 11% increase of victims coming from outside of the borough compared to the year before and a 5% increase compared to 2019/20.
- This overall trend of victims coming from outside of the borough is both due to an increase of victims of street-based violence and of domestic violence.



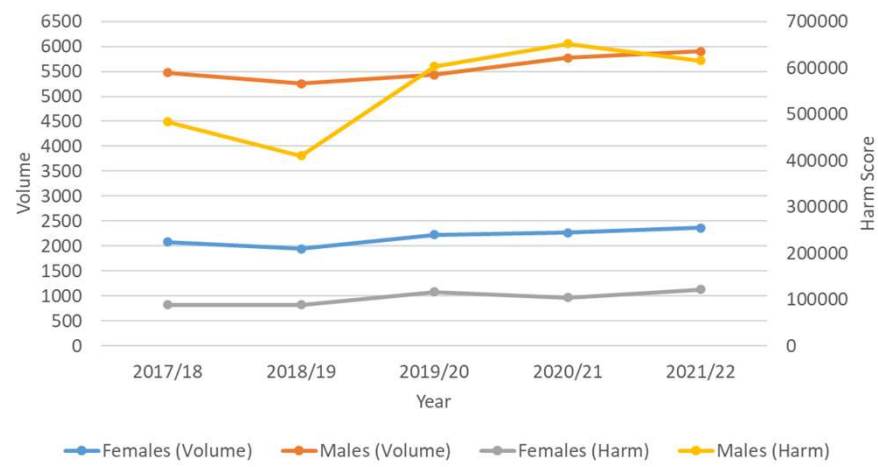
- Looking at street-based violence specifically, there has been an overall incremental increase over the last five years in the distance travelled by victims.
- On average, each year almost 60% of victims of street-based violence were less than a mile from their home.
- After a decrease in distance travelled by victims of most age categories in 2019/20 due to the pandemic, there were sharp increases last year where victims of most age categories have travelled furthest in the last five years.
- However, for those aged 10 to 17 years old, there has been a year-on-year increase in average distance travelled in the last three years.

The sex of offenders of violent crime

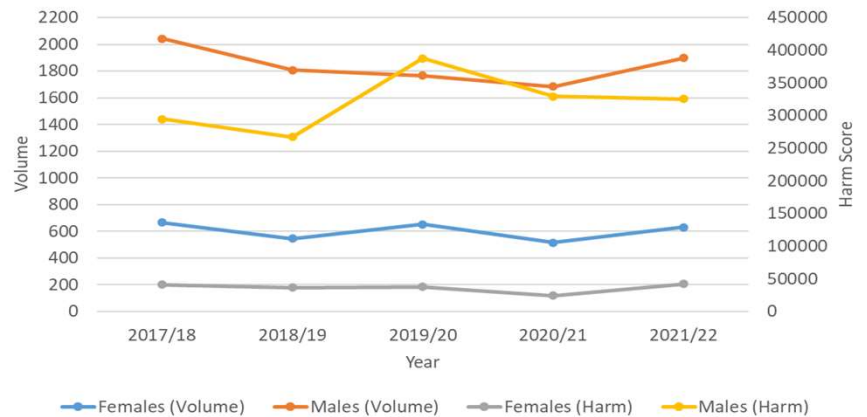
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- There is a trend of less individuals being charged for violent offences which is reflected in national statistics*.
- On average, each year the offenders of the volume of violent crime is around 72% male and 28% female. Around 85% of violent harm is committed by male offenders.
- The number of female and male offenders has increased year-on-year over the last three years where they reached their peak in 2021/22.
- The violent harm committed by female offenders increased by almost a fifth in 2021/22 compared to the year before, reaching its peak in the five year period.
- Harm committed by male offenders fell by 6% in 2021/22 compared to the year before but it was still the second highest year for harm in the five year period.

Offenders of violent crime volume and harm by sex each year in Croydon over the last five years



Offenders of street-based violent crime volume and harm by sex each year in Croydon over the last five years

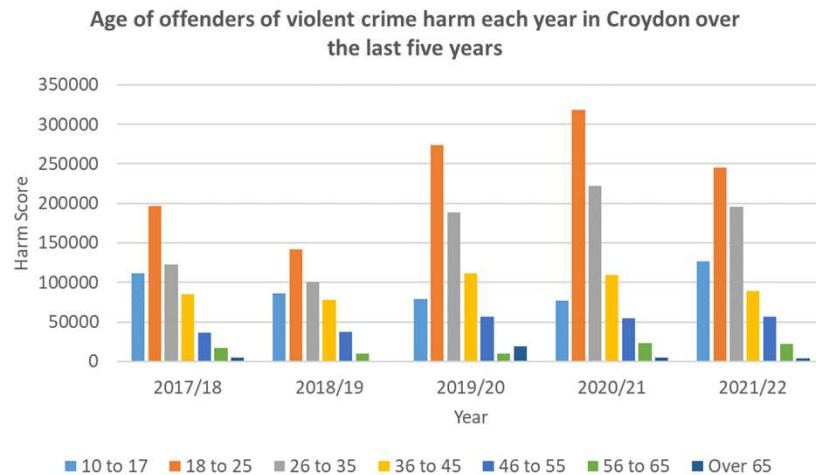
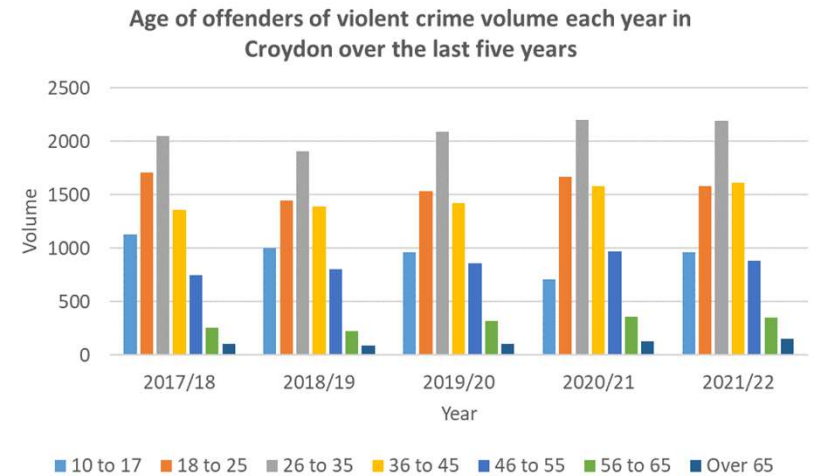


- Almost 80% of domestic offenders are male and around three quarters of domestic harm is committed by male offenders.
- For street-based violence, around three quarters of offenders are male and they commit 90% of harm.
- For street-based violence, even though the number of male offenders has increased by 13% in 2021/22 compared to the year before, the amount of harm committed fell slightly by 1%.
- The number of female offenders increased by almost a quarter in the 2021/22 and the amount of harm committed went up significantly by almost three quarters.

*This is shown in [Crime outcomes in England and Wales 2021 to 2022 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/crime-outcomes-in-england-and-wales-2021-to-2022). For greater accuracy of representation in the profiling, suspect data rather than accused data has only been used when analysing the sex and age of offenders.

The age of offenders of violent crime

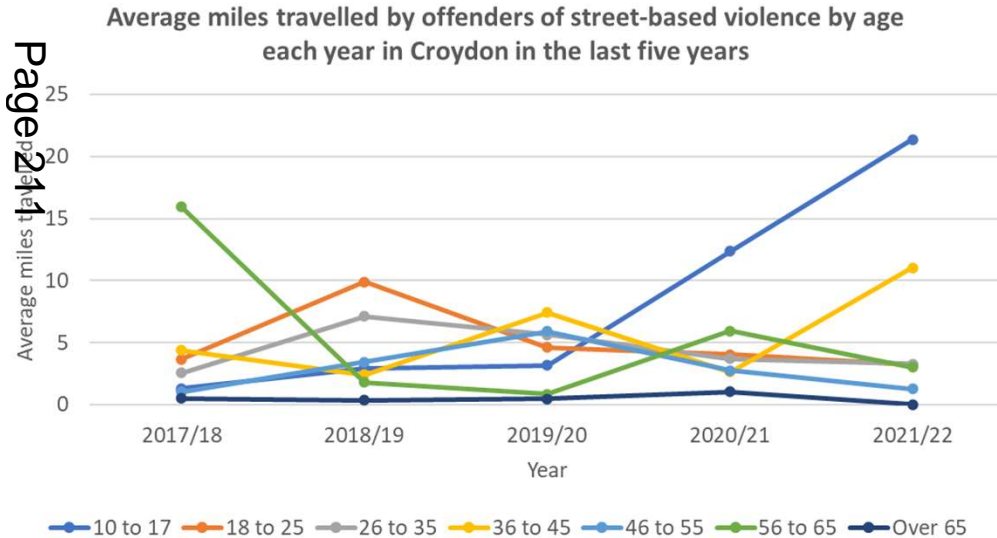
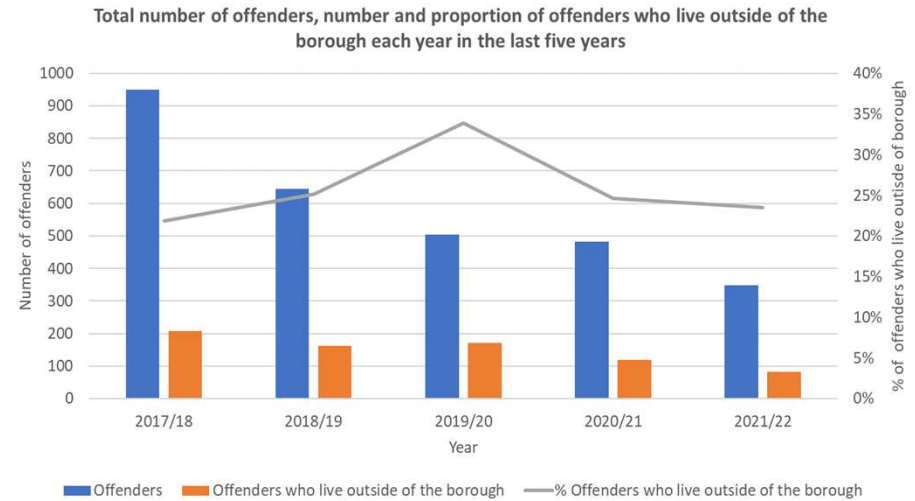
- On average, each year the age category where the highest proportion of offenders of violent crime are aged 26 to 35 years old, who represent around just over a quarter of all offenders. This is the same for street-based violence. They also represent around a third of domestic abuse offenders.
- There has been an overall trend of an increase of those aged 26 to 35 years old over the last five years. This is because of an increase of offenders in this age category who have been offenders of domestic violence and street-based violence.
- Last year was also the year for the highest number of offenders who were aged 36 to 45 years old. This is also because of an increase of offenders in this age category who have been offenders of domestic violence and street-based violence.



- On average, each year the age category where the highest proportion of harm committed by offenders of violent crime are aged 18 to 25 years who represent around a third of all harm. This is closely reflected for street-based violence.
- For domestic violence, those aged 26 to 35 years old represent around just under a third of harm each year and those aged 18 to 25 years represent around a quarter of harm.
- 2021/22 was the highest year for harm committed by offenders aged 10 to 17 years old in the last five years. This is linked to both an increase in harm in domestic violence and street-based violence.

Where offenders live and their pattern of travel

- As noted earlier, there is a trend of less individuals being charged for violent offences nationally, which is shown in the chart on the right. This has contributed to less offenders coming from outside of the borough.
- On average, each year around a quarter of offenders of violent crime live outside of the borough. These offenders make up just over a third of violent harm on average each year.
- There was a spike in the proportion of offenders coming from outside of the borough in 2019/20 but it then fell, most likely due to the Covid-19 pandemic, and has stabilised in 2021/22.

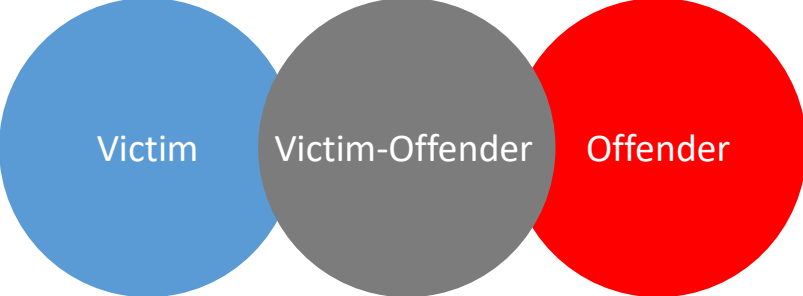


- Looking at street-based violence specifically, overall average distance travelled by offenders has fluctuated over the last five years, reaching a peak of 7 miles travelled in 2021/22.
- Each year an average of just over 40% of offenders live within one mile of the location of the crime they've committed.
- There has been a sharp year-on year increase of the average miles travelled by offenders aged 10 to 17 years old in the last three years reaching an average of 21 miles in 2021/22. It must be emphasised that the number of 10 to 17 year old offenders in 2021/22 was relatively low so it's a small number travelling a long distance.

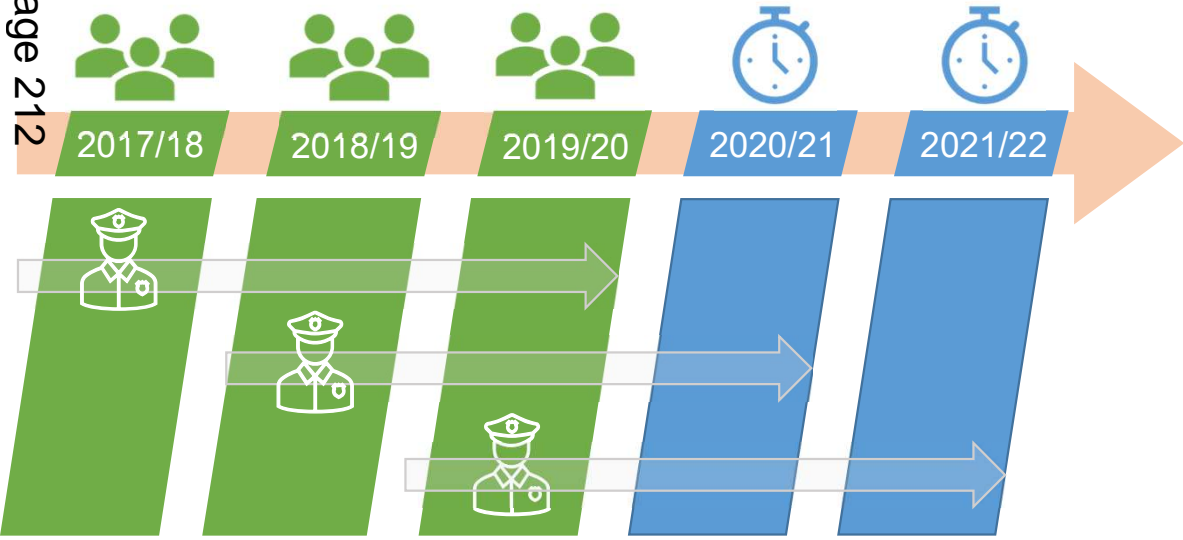
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The Victim-Offender

- The authorities have traditionally dealt with victims and offenders separately. However, there is a type of individual who significantly overlaps both who commit and suffer high volume and harm. This individual is known as the “victim-offender”.
- Research has found the strongest association between victimisation and offending exists with violent personal crimes that include big issues such as domestic violence, gang violence and non-fatal gun crime, with the most pronounced in relation to murder (Gottfredson 1984; Broidy et al. 2006; Papachriston 2018).
- Victim-offenders are the exact individuals who are caught in the cycle of not just violence but all crime in the borough where we should focus our resources.



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- The VRN is currently undertaking research on victim-offenders and their impact on crime in the borough. To conduct the research, the data sample was taken from a three year triggering intake period from 2017/18 to 2019/20 (shown on the left).
- Then there was a two year “follow up” period ending on 31st March 2022. So, for each distinct individual, they were each tracked for a total of three years.
- This gave a list of 65,790 distinct individuals which had entered this period and who were involved in a total of 85,925 crimes in the triggering intake period.
- For violence only, the sample gave a list of 24,043 distinct individuals which had entered this period and who were involved in a total of 29,819 violent crimes in the triggering intake period.

The Victim-Offender

- From the initial results of the analysis, as shown by the figures on the right for all crime, victim-offenders make up a fraction of all individuals involved in crime (4%) compared to victims (84%) and offenders (16%).
- However, victim-offenders are involved in almost three times the number of offences per person compared to victims and offenders.
- In regards to harm, victim-offenders are involved in almost five times the amount of harm as victims and almost three times the amount of harm as offenders.

All Crime			
	Victims	Offenders	Victim-offenders
Total People	55,362	8,090	2,338
Total Crime	67,169	10,768	7,988
Total Harm	4,736,521	957,382	932,035
Crime/Person	1.2	1.3	3.4
Harm/Person	85.6	118.3	398.6

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All Violence			
	Victims	Offenders	Victim-offenders
Total People	20,169	2,149	1,725
Total Crime	23,989	2,408	3,422
Total Harm	1,366,636	465,254	478,122
Crime/Person	1.2	1.1	2.0
Harm/Person	67.8	216.5	277.2

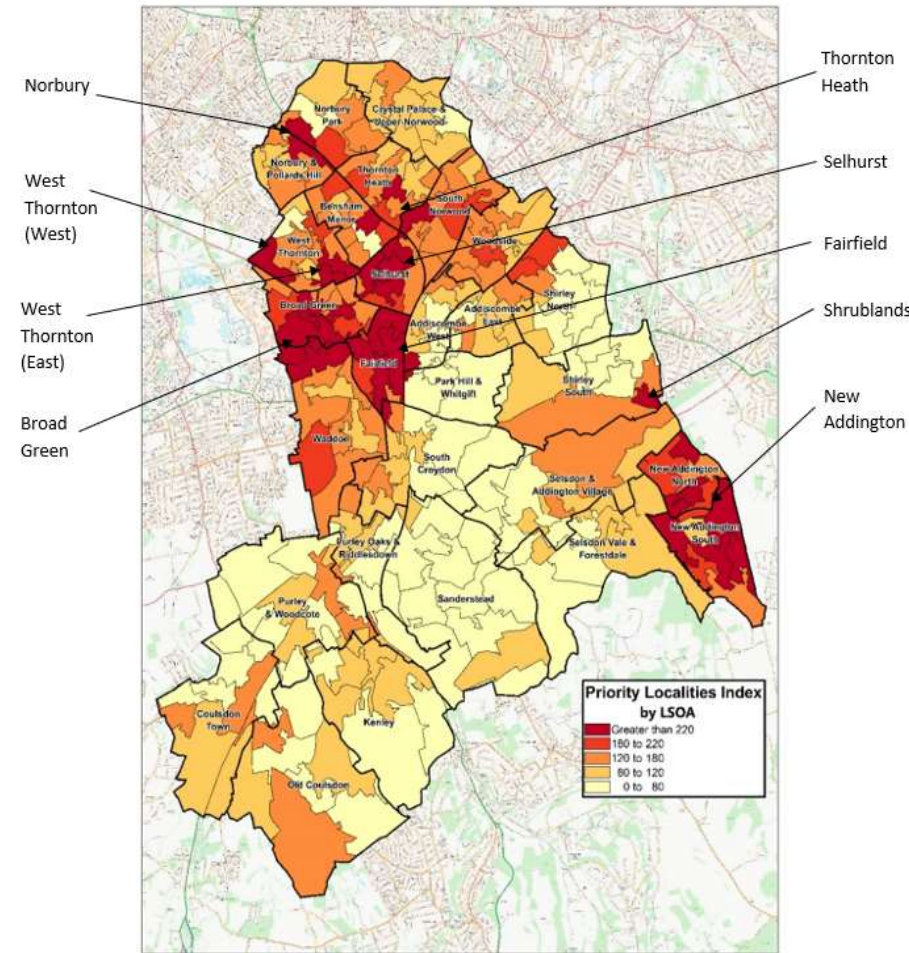
- For violence, as shown on the left, victim-offenders make up the smallest number of individuals involved (7%) compared to victims (84%) and offenders (9%).
- However, victim-offenders are involved in almost twice the number of offences per person compared to victims and offenders.
- In regards to harm, victim-offenders are involved in four times the amount of harm as victims. However, compared to offenders, victim-offenders are still involved in more harm but only 1.3 times higher.

Why is it happening?

The Borough's Priority Localities Index

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- Last year the VRN introduced an adaptation of a known analytical technique called the Vulnerable Localities Index*. This helps identifying neighbourhoods that require prioritised attention.
- Research has shown a variety of benefits including that the VLI is accurate in highlighting areas that suffer from a disproportionately wide range of multi-faceted problems, it creates a more partnership-oriented approach in reducing crime and disorder and it targets those partnership resources more effectively**
- A “alternative VLI” was adapted by the VRN called the “Priority Localities Index” (PLI) using the following variables:
 1. Domestic abuse offences in a residential setting in 2020
 2. Non-domestic criminal damage and arson to a dwelling in 2020
 3. Enquiries made to the Family Justice Service in 2020
 4. Hate crime offences in 2020
 5. Deliberate fires reported by the London Fire Brigade in 2020
 6. Individuals case managed by the Youth Offending Service in 2020
 7. Individuals who were excluded from school in 2019
 8. Individuals receiving treatment from Turning Point for alcohol and/or substance misuse in 2020
 9. Children reported as missing in 2020
 10. Income deprivation
 11. Employment deprivation
 12. Education, skills and training
 13. Proportion of young people (10 to 24 years) who make up the local population Income deprivation, employment deprivation and education, skills and training taken from the multiple indices of deprivation 2019
- Each of the variables were mapped to Lower Super Output Area level and based on their PLI, nine priority neighbourhoods were identified (right) where the majority correlate with most of the primary and secondary hotspots in the borough. The priority neighbourhoods were agreed to be targeted by the Safer Croydon Partnership under the Community Safety Strategy 2022-2024.

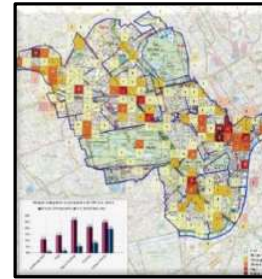


*Bullen, I. 2008. "Priority Neighbourhoods and the Vulnerable Localities Index in Wigan – a Strategic Approach to Crime Reduction" in Chaaney, S.P., & Thompson, L. (Eds), *Crime Mapping Case Studies: Practice and Research*, Chichester: Wiley.
 **Reece-Smith, R. & Kirby, S. 2013. "Exploring the VLI, for identifying priority neighbourhoods, in the context of multi-agency community safety initiatives" in *Policing: a journal of policy and practice*, Volume 7, Issue 1, 2013, pp. 42-52
<https://doi.org/10.1093/police/pas061>

Risk Terrain Modelling

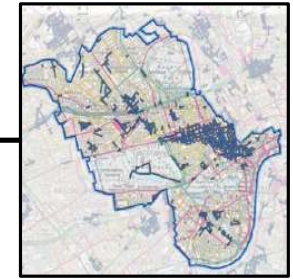
- The VRN have adopted the method of risk terrain modelling (RTM) to establish what are the underlying factors that influence crime occurrence and location.
- Where hotspot mapping, temporal analysis and predictive mapping provide information on where and when crime has previously occurred and assists in anticipating where and when it will happen, RTM assists in answering why it is happening, especially in a specific location.
- Not only is RTM designed to evaluate the physical features of a location (e.g. bus stops, pubs, bars, shops etc.) but also the model can be fed with any set of input factors for evaluation.
- Multi-variate regression analysis is carried out to identify which factors correlate with the specific crime selected.
- The model provides a geographical visualisation where these factors overlay in space to significantly increase risk.
- The model can then be used to assist in the following:
 1. Inform local taskings partner agencies to capture additional intelligence.
 2. It shifts operational, tactical and strategic plans from “reactive” to “problem solving”.
 3. It encourages and enables data sharing and joint tasking with partners.

1. Hot spot Maps

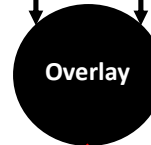


Spatial and temporal pattern of crime.

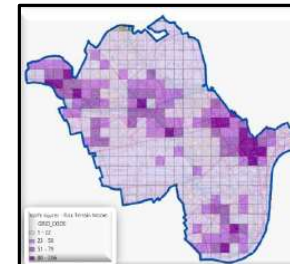
2. Predictive Maps



Where is crime expected most today?



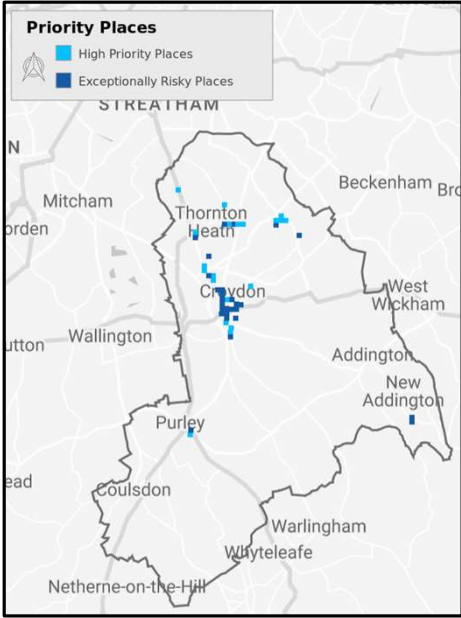
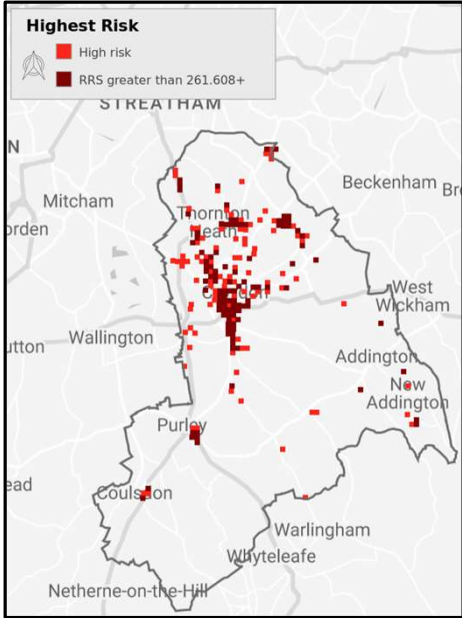
3. Risk Terrain Maps



What are the underlying factors that influence crime occurrence and location?

Risk Terrain Modelling (cont.)

- RTM was used to identify the underlying risk factors which have contributing to causing street-based violence in Croydon in 2021/22.
- The model was run at a micro-level of 150m grid cells.
- A wide range of risk factors were processed from bus stops and schools and colleges to drug trafficking offences and weapon finds.
- The map on the right titled “Highest Risk” shows the places with relative risk scores (RRS) two standard deviations or more above the mean (displayed in dark red) and/or places with RRS equal to or greater than the top 5% value (displayed in bright red).
- The map on the far right titled “Priority Places” Shows all places with relative risk scores (RRS) two standard deviations or more above the mean that intersect with recent past exposures to create exceptionally risky places (displayed in dark blue) and/or places with RRS equal to or greater than the top 1% value (displayed in light blue). The places identified on this map closely reflect the hot spot areas identified earlier.



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Risk Factor Name	Operationalisation	Spatial Influence	Relative Risk Score
Bus Stops	Proximity	450	4.181
Alcohol & Substance Misuse Clients	Proximity	300	1.981
Alcohol-related Crime	Density	150	1.898
Off Licences	Proximity	150	1.851
Restaurant, Cafes and Canteens	Density	150	1.74
Drug Trafficking	Proximity	450	1.616
Small Retailers	Proximity	300	1.606
Bus Crimes and ASB	Density	450	1.543
Weapon Finds	Proximity	150	1.508
Schools and Colleges	Proximity	150	1.502
Retailer - other	Proximity	150	1.433
Supermarkets	Proximity	450	1.376
Anti-social Behaviour CAD Calls	Proximity	150	1.322
Drug-related CAD Calls	Proximity	150	1.307
Takeaways	Proximity	150	1.293
Hotels and Guesthouses	Proximity	150	1.266

- The top risk factors for street-based violence are shown in the table on the left. The highest risk was bus stops, which especially reflects the survey the VRN conducted with women and girls in the borough last year where bus stops came highest as a place they do not feel safe.
- The risk factors linked to alcohol and drugs were also particularly high.
- The analysis carried out is constant and, therefore, the VRN are working to collect, collate and process more data from a wide range of sources to build the most accurate picture of the risk factors causing violence in specific areas.

Recommendations

From the analysis conducted in this document, the following recommendations are:

1. To write a **problem profile on Violence Against Women and Girls (VAWG)** in the borough which will feed into the VAWG strategy. This is not only to cover both domestic and non-domestic violence and sexual offences but other specific offences which have seen notable increases including stalking, threats to kill and malicious communications.
2. To evaluate and target **“high volume high harm” micro-areas** of violence using Risk Terrain Modelling so appropriate short, medium and long-term interventions can be implemented.
3. To investigate further into the **rise in victims travelling from outside of the borough** and to work with the relevant authorities in those areas to protect potential victims who are travelling from there.
To explore and utilise the “2 x 2” model to **prioritise appropriate interventions for individuals involved in violence.**
To further explore the concept of **“victim-offenders”** so that intensive long-term provision can be provided to significantly reduce all crime in the borough, not just violence.
6. To further utilise **alcohol and substance misuse service provision.**
7. To have a greater focus on **public transport in the borough**, especially around bus stops which have been identified as a high risk factor for violence.
8. To further investigate **cruelty and neglect of children**, which has seen a small but significant increase in the borough.
9. With the increase in knife crime being driven by **knife-enabled robbery**, this is to be a priority for the next 12 months.

Lewis Kelly
Intelligence & Performance Manager
Intelligence & Performance Team
Violence Reduction Network
Lewis.Kelly@croydon.gov.uk

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CABINET REPORT TEMPLATE AND GUIDANCE

REPORT TO:	CABINET 16 November 2022
SUBJECT:	A Public Space Protection Order (PSPO) in Croydon Town Centre
LEAD OFFICER:	Nick Hibberd Corporate Director of Sustainable Communities, Regeneration & Economic Recovery Kristian Aspinall Interim Director Culture & Community Safety
CABINET MEMBER:	<i>Councillor Ola Kolade</i> Cabinet Member for Community Safety
WARDS:	<u>Specifically</u> Broad Green Fairfield South Croydon

SUMMARY OF REPORT:

To report on the outcome of the consultation with members of the public and partners on implementing a PSPO in Croydon Town Centre, the process for making a PSPO, the proposed area which the PSPO would cover, and the activities which it is proposed the PSPO should restrict, and to seek approval for the making of a PSPO in Croydon Town Centre.

FINANCIAL IMPACT:

There are no significant financial impacts from the Policy identified and no additional funding is being requested. The primary cost is installing new signage through the proposed PSPO zones which is funded by the Violence Reduction Network (VRN).

KEY DECISION: Yes

RECOMMENDATIONS:

The Executive Mayor, in Cabinet, is recommended to:

- i. To consider the outcome of the consultation on the proposed Town Centre Public Spaces Protection Order (PSPO)
- ii. To note the significant strong support for the proposal, with over 80% of respondents supporting the measure strongly

- iii. To approve the making of the Town Centre Public Spaces Protection Order for a term of 3 years and in accordance with the draft Order set out in Appendix G.
- iv. To approve the process for the implementation of the Town Centre Public Spaces Protection Order.

1. PSPO CONSULTATION

- 1.1 Following the PSPO Cabinet report that was taken to Cabinet in July 2022, it was agreed that the Council would conduct a formal 6-week consultation to allow residents and visitors the opportunity to provide their comments and feedback on a PSPO covering a geographical area, in and around the Town Centre. Section 72 of the Anti-social Behaviour, Crime and Policing Act 2014 requires a local authority to carry out the “necessary consultation, and the necessary publicity and the necessary notification (if any)” before making a PSPO. The necessary consultation means consulting with the relevant Chief Officer of Police and the local policing body, and whatever community representatives the local authority thinks it’s appropriate to consult, and the owner or occupier of land within the restricted area. There was previously a PSPO in the Town Centre which commenced in 2017 and provided the Police additional powers to tackle ASB in the area which was well received and was allowed to lapse in 2020.
- 1.2 All available council communication channels were used to promote the consultation and encourage people to complete the survey. This included a link on the Council’s webpage (<https://www.getinvolved.croydon.gov.uk/town-centre-pspo>) which received over 4,600 visits. Emails were sent to statutory consultees as well as emails and reminder emails to community group distribution list (561 contacts). Community groups were also invited to respond themselves as “community representatives”. The Chief Officer of Police and the local policing body were consulted and responded stating that they were in favour of having a PSPO in place There was a press release and news story on news.croydon.gov.uk which had 1,338 views. There were a number of social media posts through the consultation
- Twitter – six posts received a total of 23,071 impressions
 - Facebook – five posts received a total of 3,973 impressions
 - Instagram – one post received a total of 4,488 impressions
- 1.3 The consultation was included in three editions of the Council’s weekly “Your Croydon” bulletin that went out to over 80,000 email addresses. There was an article on staff intranet and included in the staff Our Croydon bulletin. It was also published in two editions of the Council’s business bulletin that was circulated to over 6,000 businesses. In order to consult with the owners or occupiers of land within the restricted area a survey was sent out and circulated via the Comms Team and the relevant Business Improvement Districts (BID).

- 1.4 The “necessary publicity” means in the case of a proposed order, publishing the text of it. The text of the proposed order will be published following a decision at Cabinet. The draft order can be seen in Appendix G.
- 1.5 The “necessary notification” means notifying certain authorities of the proposed order. The following authorities will be notified following a decision: the Met Police, the London Fire Brigade, National Probation Service, Health, and the BIDs.

2. MAIN FINDINGS FROM THE PSPO CONSULTATION

- 2.1 There was a total of 1,390 respondents to the survey.
- 2.2 Over 80% of respondents “definitely agree” with a PSPO in the town centre. 90% of respondents either “definitely agree” or “somewhat agree” with a PSPO.
- 2.3 Over 60% of respondents “definitely agree” with the proposed area of the PSPO in the town centre. This goes up to three quarters of respondents when including those who answered “somewhat agree”.
- 2.4 Around three quarters of respondents “definitely agree” that street drinking negatively impacts the town centre. This goes up to 90% when including those who answered “somewhat agree”.
- 2.5 Almost half of all respondents “definitely agree” that loud noise negatively impacts the town centre. This increases to almost three quarters of respondents when including those who answered “somewhat agree”.
- 2.6 Three quarters of all respondents “definitely agree” that groups causing anti-social behaviour negatively impacts the town centre. This goes up to over 90% when including those who answered “somewhat agree”.
- 2.7 Over 80% of respondents have either experienced or witnessed people harassing or intimidating residents, businesses, or members of the public. Over a quarter stated this was daily and a third stated it occurred on a weekly basis.
- 2.8 Over 80% of respondents have either experienced or witnessed people using threatening or intimidating behaviour including verbal abuse.
- 2.9 Over 90% of respondents have experienced or witnessed street drinking. Over half witnessed this daily.
- 2.10 Over 80% of respondents have experienced or witnessed people acting in an anti-social manner causing harassment, alarm, or distress. 70% of respondents witness this on a daily or weekly basis.
- 2.11 Three quarters of respondents have experienced or witnessed urinating in a public place. Over a fifth witnessed this daily and over a quarter on a weekly basis.

2.12 When asked what other issues have experienced in the Town Centre that are not listed, most respondents listed drug issues

2.13 Please refer to Appendix E for the Public Space Protection Order Consultation Results.

3. KEY ISSUES RAISED

3.1 Throughout the consultation there were several key themes that emerged.

3.2 Feedback received related to increasing the PSPO area to incorporate surrounding areas. Should the PSPO be implemented a review of the area will take place after two months to ensure that displacement is not occurring. Should direct displacement be occurring in areas outside the impacted area such as the areas identified above, the order can potentially be amended to increase the area covered by the PSPO. The Partnership will continue to monitor the areas identified as hotspots for crime and anti-social behaviour. Ongoing issues in ASB and Crime hotspots are discussed at the monthly Joint Agency Group (JAG) meeting. The JAG is the medium-term operational arm of the Safer Croydon Partnership (SCP) and is a multi-agency intelligence led local partnership focussed on anti-social behaviour and related crime & disorder, dealing with the threat, risk and harm to local communities and local people, identifying and tackling crime and anti-social behaviour through collaborative problem solving. Previously services have visited the areas to assist identify individuals and sign post them to relevant services. Local Policing team (LPT), Housing Providers, Youth Engagement Service as well as the Substance and Alcohol Misuse team have all conducted visits to some of the areas identified.

3.3 Feedback received related to the PSPO criminalising behaviour of a group of vulnerable people that is better treated through more personal support. The purpose of the PSPO is not to target vulnerable people and/or groups. The Council will continue to work very closely with Mental Health Services, Social Care and Housing Providers to ensure interventions are put in place to help vulnerable people. There are regular case conferences and meetings with Adult Social Care, the Substance and Alcohol Misuse Team, VCS organisations as well as the Rough Sleeping services to ensure that services engage with vulnerable people in the community who require assistance. The purpose is to share areas requiring services to conduct outreach in and to engage with the individuals to address their behaviour and most importantly their needs. Please note, that enforcement action is not progressed unless all interventions have been exhausted.

3.4 The Consultation highlighted that drug dealing and drug use is a concern. The Police will continue to deal with criminal offences such as drug dealing. The PSPO would not replace the powers but provide the Police with additional measures.

3.5 The PSPO would be in place 24/7 for 365 days a year and be in place for three years from implementation with reviews taking place.

4. PARTNERSHIP

- 4.1 As part of the consultation, various community organisations were invited to respond to the consultation in their own name, on behalf of their members.
- 4.2 Please refer to Appendix F and H for the Public Space Protection Order Consultation feedback from partners.

5. NEXT STEPS

- 5.1 Given the results of the consultation which revealed a high incidence of people witnessing or experiencing anti-social behaviour and street drinking in the proposed restricted area, it is proposed to proceed with the making of a PSPO. The proposed PSPO is set out in Appendix G. It is considered that the prohibitions and requirements which it is proposed should be contained in the PSPO are reasonable and proportionate and are targeted at the specific activities and behaviours which are causing nuisance and harm. It is considered these are the minimum measures necessary to prevent or reduce the detrimental effect which these activities are having on the quality of life of those living or working in or visiting the Town Centre.
- 5.2 The PSPO signs will be designed and produced shortly in order for them to be installed in key locations across the geographical area of the town centre if the PSPO is approved.
- 5.3 If the PSPO is approved, the reporting mechanism for monitoring the usage of the PSPO will be built into the Police training package which will be an ongoing process but would initially take place in November and December 2022.
- 5.4 Design and installation of signage is currently subject to significant delays that are sector wide. Should the Mayor order the implementation of the PSPO we are aiming to have it fully in effect for the Christmas / New Year period which is traditionally a time of high anti-social behaviour in the borough.

6. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 6.1 The Council has a duty to do all that it reasonably can to prevent crime and disorder in its area and work towards delivering the objectives of the Safer Croydon Partnership plan. The implementation of any PSPO assists the Council with meeting these requirements by providing the Council and Police with additional powers to tackle the issues identified.

7. OPTIONS CONSIDERED AND REJECTED

- 7.1 Do Nothing – the Police team and Council will continue to issue Community Protection Notice Warnings (CPNW) to try and prevent the behaviour from taking place. However, it is considered that relying on such Notices alone will

not be sufficient to reduce the various types of anti-social behaviour identified by the results of the consultation, to a reasonable level.

- 7.2 Use existing by-laws – the council has by-laws in place for our parks and green spaces, but no relevant by-law for the area that is proposed to be covered by this PSPO. By-laws have generally been superseded by PSPOs to tackle anti-social behaviour of this type.

8. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

Revenue and Capital consequences of report recommendations

- 8.1 There are limited capital or revenue implications associated with this report. There are no significant financial impacts from the Policy identified and no additional funding is being requested.

- 8.2 The primary cost to proceed with a PSPO would be installing new signage through the proposed PSPO zone and would be met from existing budgetary provision. This will cost approximately £6000.

8.3 The effect of the decision

Introducing a new PSPO will enable the Council and its partners to utilise additional powers to tackle street based anti-social behaviour within the selected areas. This is in accordance with delivering against the priorities within the Safer Croydon Strategy. This will in turn support the borough's ability to attract new businesses and residents to the area. The effect of implementing a new PSPO will not result in an increase in Council and Police resources which will remain the same. The team and partnership governance framework already exists that will absorb and deliver this work so there is little or no financial impact.

8.4 Risks

The area that the PSPO covers were considered as part of the consultation and data collection, as the Council must evidence that there is a significant nuisance or problem in a specific area that is detrimental to the local community's quality of life, please refer to Appendix B. Having a larger PSPO may leave the Council open to challenge if it cannot evidence the need and will stretch the Safer Croydon Partnership resources available to enforce the PSPO, thereby potentially diluting its impact and adversely influencing public perception on the efficacy of PSPOs as a response to anti-social behaviour.

8.5 Options

- Approve the progression of a new PSPO
- Do not approve the progression of a new PSPO, which may have reputational impact for the community safety partners who have requested assistance in

tackling the behaviour exhibited. Failure to introduce the new PSPO may continue to inhibit the Council's ability to make use of new powers to tackle anti-social behaviour in the town centre.

8.6 Future savings/efficiencies

There are no savings or efficiencies associated with this report

Approved by: Head of Finance – Sustainable Communities, Regeneration & Economic Recovery

9. LEGAL CONSIDERATIONS

The Head of Litigation and Corporate Law comments on behalf of the Director of Legal Services that:

- 9.1 Sec 59 of the Anti-social Behaviour, Crime and Policing Act 2014 provides that a local authority may make a public spaces protection order if satisfied on reasonable grounds that two conditions are met. The first condition is that activities carried on in a public place within the authority's area have had a detrimental effect on the quality of life of those in the locality, or that it is likely that activities will be carried on in such a place and that they will have such an effect. The second condition is that the effect, or likely effect of the activities is, or is likely to be of a persistent or continuing nature, is, or is likely to be such as to make the activities unreasonable, and justifies the restrictions imposed by the notice. Evidence of the various types of anti-social behaviour occurring in the town centre and its detrimental effects, and of the persistent and unreasonable nature of this behaviour was contained in the report to Cabinet at the July Cabinet meeting.
- 9.2 In addition, the only prohibitions or requirements that may be imposed are ones that are reasonable to impose in order to prevent such detrimental effect from continuing, occurring or recurring, or to reduce such detrimental effect or to reduce the risk of its continuance, occurrence or recurrence. It is considered that the prohibitions and requirements which it is proposed should be contained in the PSPO are reasonable and proportionate and are targeted at the specific activities and behaviours which are causing nuisance and harm. It is considered these are the minimum measures necessary to prevent or reduce the detrimental effect which these activities are having on the quality of life of those living or working in or visiting the Town Centre.
- 9.3 Sec 72 of the 2014 Act requires a local authority to carry out the "necessary consultation, and the necessary publicity and the necessary notification (if any)" before making a PSPO. The necessary consultation means consulting with the relevant Chief Officer of Police and the local policing body, and whatever community representatives the local authority thinks it's appropriate to consult, and the owner or occupier of land within the restricted area. Details of the consultation which has been carried out, and the outcome of that consultation are set out earlier in this report.

Cabinet & Executive Template

- 9.4 The “necessary publicity” means in the case of a proposed order, publishing the text of it. The text of the proposed order will be published following a decision at cabinet. The draft order can be seen in Appendix G.
- 9.5 The “necessary notification” means notifying certain authorities of the proposed order. The following authorities will be notified following a decision: the Met Police, the London Fire Brigade, National Probation Service, Health, and the BIDs.
- 9.6 Sec 72 of the 2014 Act requires a local authority, in deciding whether to make a PSPO and if so, what it should include, to have particular regard to the rights of freedom of expression and freedom of assembly as set out in articles 10 and 11 of the Convention for the Protection of Human Rights and Fundamental Freedoms. In addition, under Sec 6 of the Human Rights Act 1998 it is unlawful for the Council, as a public authority, to act in a way which is incompatible with a Convention right. Given that the proposed PSPO restricts only a limited number of activities within a limited area, and given also the results of the consultation which revealed a high incidence of people witnessing or experiencing anti-social behaviour and street drinking in the proposed restricted area, it is considered that it is proportionate to make the proposed PSPO as this will fulfil a legitimate aim of curbing anti-social behaviour in public places for the benefit of the law-abiding majority, and that the restrictions which will be placed on the rights and freedoms mentioned above are lawful, necessary and proportionate.
- 9.7 It is important to ensure that the scope and the process for making a PSPO is in accordance with the powers and requirements of the 2014 Act. Any challenge to a PSPO would have to be made by an interested person by way of an application in the High Court for permission to seek a Judicial Review. That application must be made within six weeks of the PSPO being made. A person who receives an FPN due to a breach of PSPO can also challenge the validity of the order. This means that only those who are directly affected by the restrictions have the power to challenge. Interested persons can challenge the validity of a PSPO on two grounds. They could argue that the council did not have power to make the order, or to include particular prohibitions or requirements. In addition, the interested person could argue that one of the requirements (for instance, consultation) had not been complied with. When the application is made, the High Court can decide to suspend the operation of the PSPO pending the verdict in part or in totality. The High Court can uphold the PSPO, quash it, or vary it.
- 9.8 The arrangements set out in this report and in the report to July Cabinet evidence that the Council will satisfy the various requirements for making a PSPO under the 2014 Act.

Approved by Sandra Herbert, Head of Litigation and Corporate Law on behalf of the Director of Legal Services & Monitoring Officer

10. HUMAN RESOURCES IMPACT

There are no staffing implications or any other HR impact arising from this report or from this decision. If any issues arise these will be managed under the Council policies and procedures.

Approved by: *Jennifer Sankar, Head of HR, Housing and Sustainable Communities, Regeneration and Economic Development Directorates, for and on behalf of Dean Shoesmith, Chief People Officer*

11. EQUALITIES IMPACT

11.1 The Council has a statutory duty to comply with the provisions set out in the Equality Act 2010. In summary, the Council must in the exercise of all its functions, “have due regard to” the need to comply with the three arms or aims of the general equality duty. These are to:

- eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Act;
- advance equality of opportunity between people who share a protected characteristic and people who do not share it; and
- foster good relations between people who share a protected characteristic and people who do not share it.

11.2 Having due regard means to consider the three aims of the Equality Duty as part of the process of decision-making. This means that decision makers must be able to evidence that they have taken into account any impact of the proposals under consideration on people who share the protected characteristics before decisions are taken.

11.3 Any proposed PSPO is likely to have a positive impact on certain protected groups such as victims of hate (gender, sex, race, sexuality, religious or disability) related ASB, it will apply to the whole population and its use will be determined by the behaviour occurring rather than the protected group. The exception is young people who cannot be issued with a FPN if they are under 18 years of age.

11.4 The implementation of any PSPO should not preclude the ongoing of support and outreach services to individuals requiring assistance in the designated area. Support should also be provided to targets of domestic abuse.

Approved by: Denise McCausland – Equality Programme Manager

12. ENVIRONMENTAL IMPACT

There is limited impact on the environment as a result of this report. Some anti-social behaviour and street drinking activity may be related to waste,

noise or other issues that affect people's quality of life but the policy is principally about improving behaviour rather than the environment.

13. CRIME AND DISORDER REDUCTION IMPACT

The proposed PSPO will provide additional powers to Council and Police officers to take action against the prohibitions listed as part of the PSPO within the designated area. This would directly support the Council in discharging its statutory duty under Section 17 of the Crime and Disorder Act 1998 to exercise its various functions with due regard to the likely effect of the exercise of those functions, and the need to do all that it reasonably can to prevent crime and disorder in its area. The proposed PSPO would also support the Council and its partners in delivering the Safer Croydon Strategy, specifically the importance to focus on high priority neighbourhoods.

(Approved by: Director of Culture & Community Safety)

14. DATA PROTECTION IMPLICATIONS

14.1 WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?

NO

14.2 HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN COMPLETED?

NO

The Director of Culture and Community Safety confirms that a DPIA will be completed as part of the process if a decision is made to implement a PSPO.

CONTACT OFFICER: Kristian Aspinall, Director of Community Safety and Culture

APPENDICES TO THIS REPORT:

Appendix A: PSPO Order 2017.

Appendix B: Street-based alcohol-related crime in Croydon Town Centre

Appendix C: Map of the proposed area

Appendix D: Public Space Protection Order Cabinet Report July 2022

Appendix E: Public Space Protection Order Consultation Results

Appendix F: Public Space Protection Order Consultation feedback from partners.

Appendix G: Draft PSPO Order

BACKGROUND PAPERS

BACKGROUND DOCUMENTS – LOCAL GOVERNMENT ACT 1972

[For executive decision making it is a requirement that all Part A (open) reports & Part B reports (closed) must list and provide an electronic and a printed copy of all background reference.]

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LONDON BOROUGH OF CROYDON

Croydon Town Centre

PUBLIC SPACES PROTECTION ORDER (STREET DRINKING AND ANTI-SOCIAL BEHAVIOUR) No. 1 of 2017

This Public Spaces Protection Order ('Order') is made under section 59 of the Anti-Social Behaviour, Crime and Policing Act 2014 ('ASBCPA 2014').

PRELIMINARY

1. Croydon Council, in making this Order:
 - a. is satisfied on reasonable grounds that:
 - i. the Activities listed in paragraph 3 below have been carried out in a public place within the Council's area, namely the area identified below as the Restricted Area, and have had a detrimental effect on the quality of life of those in the locality, and that:
 - ii. the effect, or likely effect, of the Activities:
 - a. is, or is likely to be, of a persistent or continuing nature,
 - b. is, or is likely to be, such as to make the Activities unreasonable, and
 - c. justifies the restrictions imposed by this Order.
 - b. is satisfied that the prohibitions and requirements imposed by this Order are reasonable in order to prevent the detrimental effect referred to in paragraph 1 above from continuing, occurring or recurring, or to reduce that detrimental effect or to reduce the risk of its continuance, occurrence or recurrence.
 - c. has had regard to the rights and freedoms set out in the European Convention on Human Rights as defined in s.21(1) of the Human Rights Act 1998, and in particular, to those rights set out in Article 10 (right of freedom of expression) and Article 11 (right of freedom of assembly) and

has concluded that the restrictions on such rights and freedoms imposed by this Order are lawful, necessary and proportionate.

THE RESTRICTED AREA

2. This Order applies to the area in the London Borough of Croydon to which the public have or are permitted to have access, whether with or without payment, as identified in the Schedule attached to this Order and in the area outlined in the plan attached to this Order including any street, road, footway, footpath, square, courtyard, grassed area, stairway, walkway, subway or similar place in the open air.

THE ACTIVITIES

3. The Activities referred to in paragraph 1 of this Order are:
 - a. Consuming alcohol in the restricted area other than in premises identified by section 62 of ASBCPA 2014.
 - b. People or groups of people behaving in a manner which is likely to cause harassment, alarm or distress, in the restricted area.

THE PROHIBITIONS

4. By this Order no person shall at any time in any public place within the relevant restricted areas (the boundaries of which are delineated on the map in Schedule 1 of this Order) engage in any of the following prohibited activities identified in paragraph 4a(i) and 4a(ii) of this Order:
 - a. In respect of the area identified in map 1 in Schedule 1 of this Order, being Croydon Town Centre:
 - i. Being in possession of an open container of, or consuming alcohol, save in premises falling within section 62 of the ASBCPA 2014.
 - ii. Behaving in a manner, either as an individual or within a group of people, which is likely to cause harassment, alarm or distress.

THE REQUIREMENTS

5. Any person directed to leave the restricted area by a Police Officer, Police Community Support Officer or other officer authorised to make such a direction by Croydon Council, shall do so. Such a direction may be given where the officer is satisfied that the person concerned has breached this order either by (1) consuming alcohol in the manner described in paragraph 4a(i) above or (2) by behaving in a manner which is likely to cause harassment, alarm or distress.

INFORMATION

6. By virtue of s.63 of the ASBCPA 2014, where a constable or a person authorised by the Council or under s.69 of the ASBCPA 2014 reasonably believes that a person:
 - (a) is or has been consuming alcohol in breach of a prohibition in a public spaces protection order, or
 - (b) intends to consume alcohol in circumstances in which doing so would be a breach of such prohibition, he or she may require a person:
 - (i) not to consume, in breach of the order, alcohol or anything which the constable or authorised person reasonably believes to be alcohol;
 - (ii) to surrender anything in a person's possession which is, or which the constable or authorised person reasonably believes to be, alcohol or container for alcohol.
7. A constable or an authorised person who imposes a requirement under s.63 must tell the person that failing without reasonable excuse to comply with the requirement is an offence. Such a requirement imposed by an authorised person is not valid if the authorised person:
 - (a) is asked by the person to show evidence of his or her authorisation, and
 - (b) fails to do so.
8. A constable or an authorised person may dispose of anything surrendered (namely alcohol or anything reasonably believed to be alcohol) in whatever way he or she thinks appropriate.
9. A person who fails without reasonable excuse to comply with a requirement imposed on him or her by a constable or authorised person under s.63 of the

2014 act, commits an offence and is liable on summary conviction to a fine not exceeding level 2 on the standard scale (currently £500).

10. By virtue of s.67 of the ASBCPA 2014, it is an offence for a person without reasonable excuse:
 - a. to do anything that the person is prohibited from doing by this Order,
or
 - b. to fail to comply with the requirement to which the person is subject
by this Order
11. A person guilty of an offence under s.67 of the 2014 act, is liable on summary conviction to a fine not exceeding level 3 on the standard scale (currently £1000).
12. A constable or an authorised person may under s.68 of the 2014 act, issue a fixed penalty notice to anyone he or she has reason to believe has committed an offence under section 63 or 67 in relation to this Order.
13. A person does not commit an offence under this section by failing to comply with a prohibition or requirement that the Council did not have power to include in this Order.
14. If an interested person wishes to challenge the validity of this Order he or she may apply to the High Court within six weeks beginning with the date on which this Order is made. The grounds on which a challenge can be made are that the Council did not have the power to make this Order, or that a requirement imposed by Chapter 4 of the ASBCPA 2014 was not complied with, see further section 66 of the ASBCPA 2014.

COMMENCEMENT, DURATION AND CITATION

15. This Order shall come into force on 18th December 2017. This Order shall remain in force for a period of three years.
16. This Order may be cited as the Public Spaces Protection Order for the London Borough of Croydon No.1 of 2017.

Dated: 1st December 2017

A handwritten signature in black ink that reads "Andy Gee". The signature is written in a cursive style with a large, prominent 'A' and 'G'.

Signed:

Director of Public Safety

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Street-based alcohol-related crime in Croydon Town Centre

Official-Sensitive

Data contained within this report should not be shared without the prior permission of the report author(s).

Lewis Kelly

Intelligence and Performance Manager

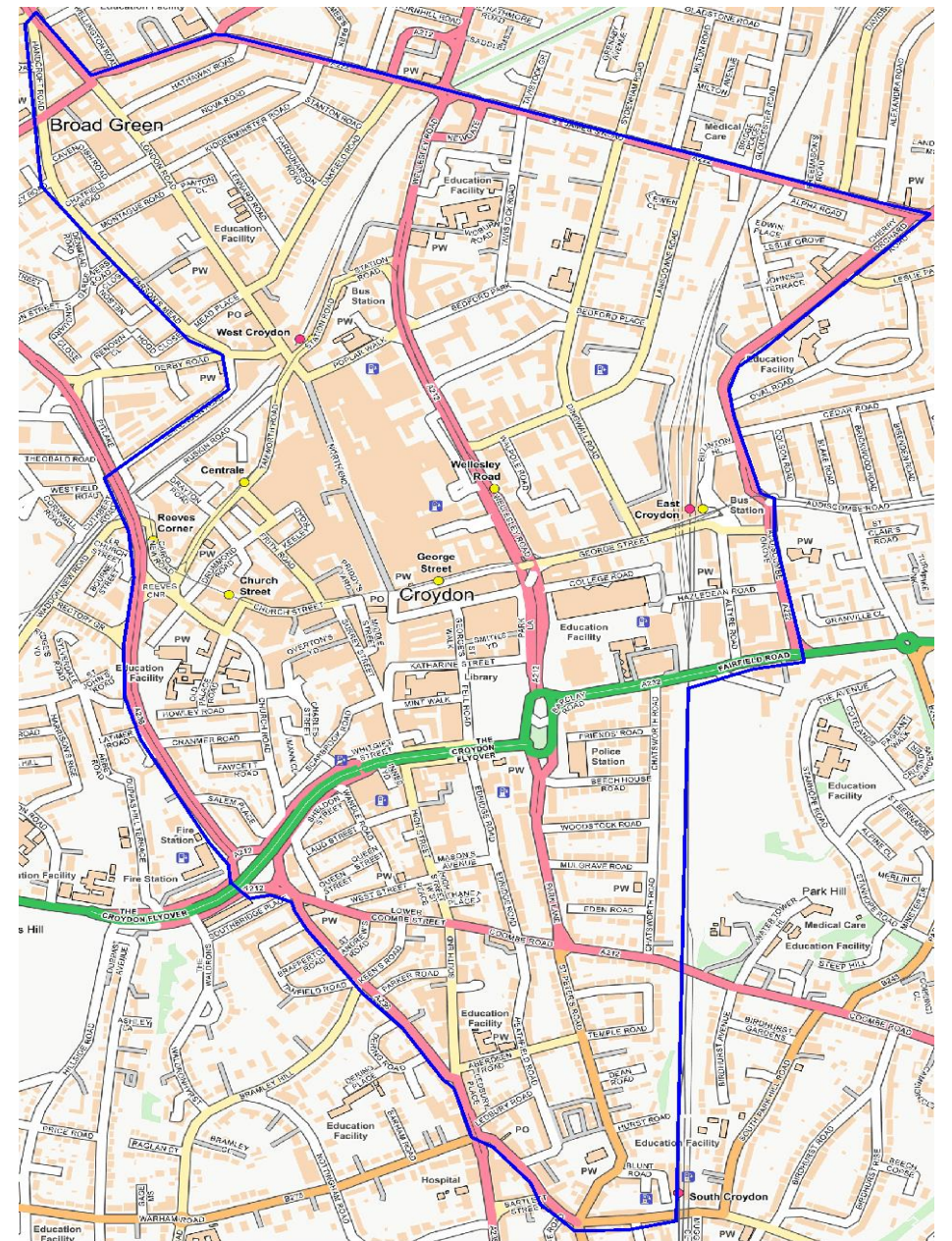
Violence Reduction Network

Sustainable Communities, Regeneration & Economic Recovery

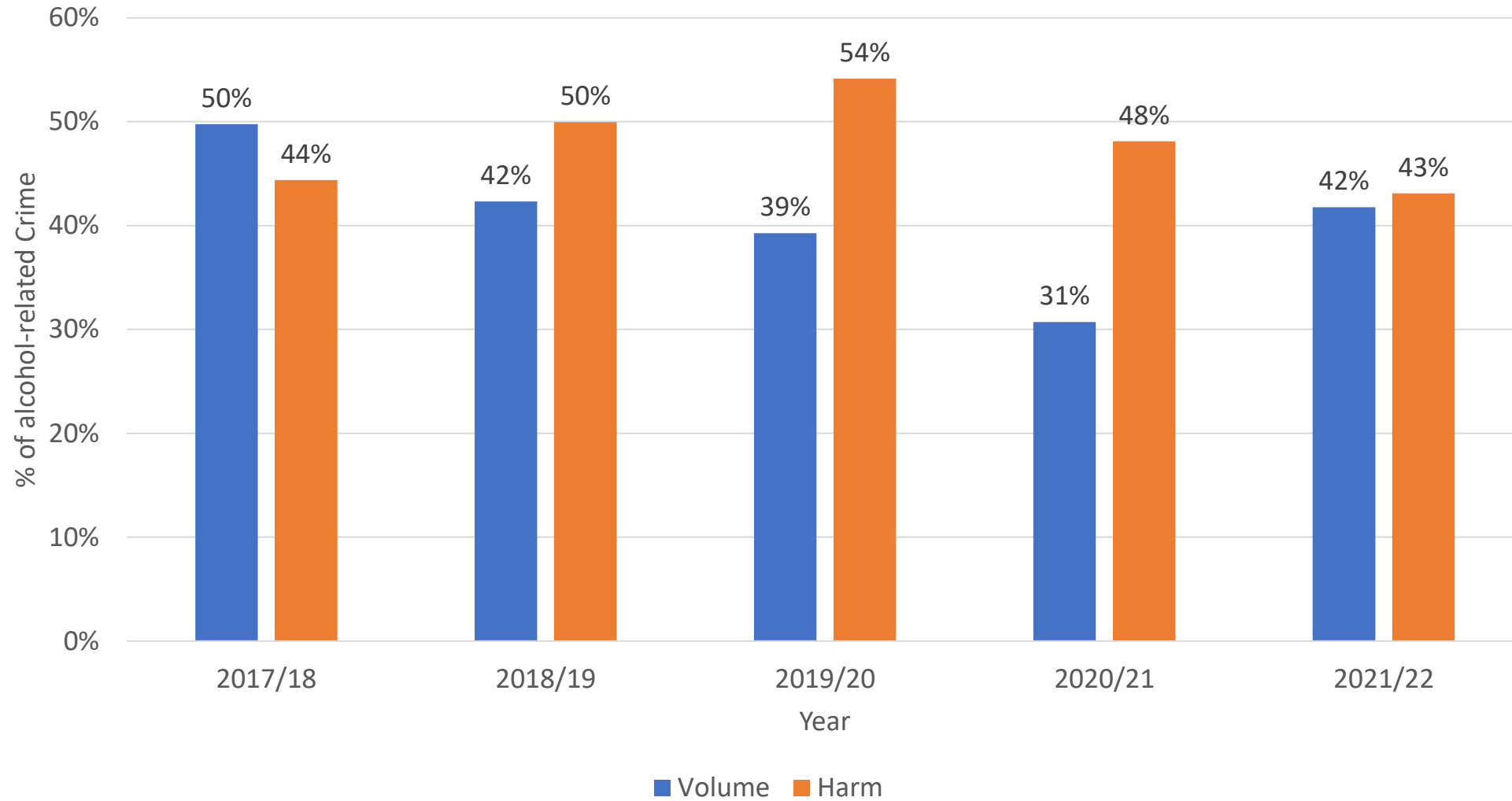
23/05/2022

Geographical area

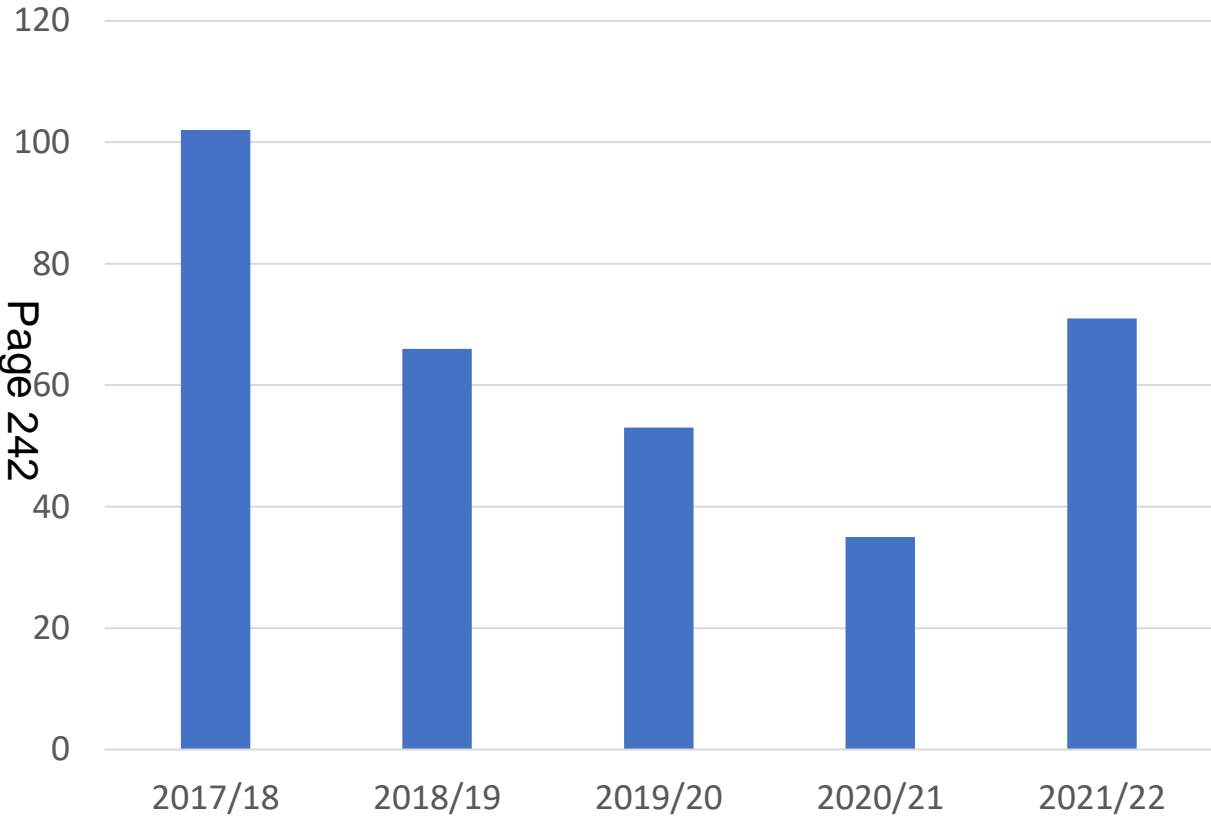
For the purpose of the report, the statistics that are presented in this pack include the blue area in the map provided.



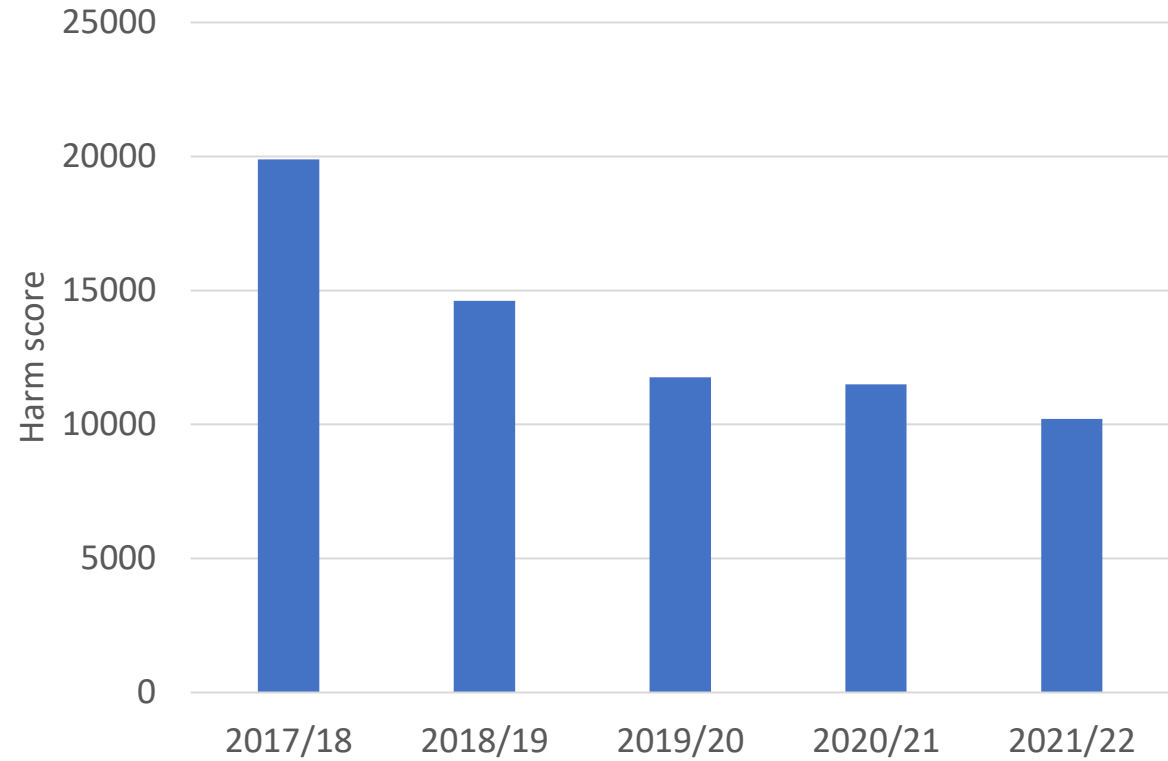
% of street-based alcohol-related crime in Croydon committed in Croydon Town Centre



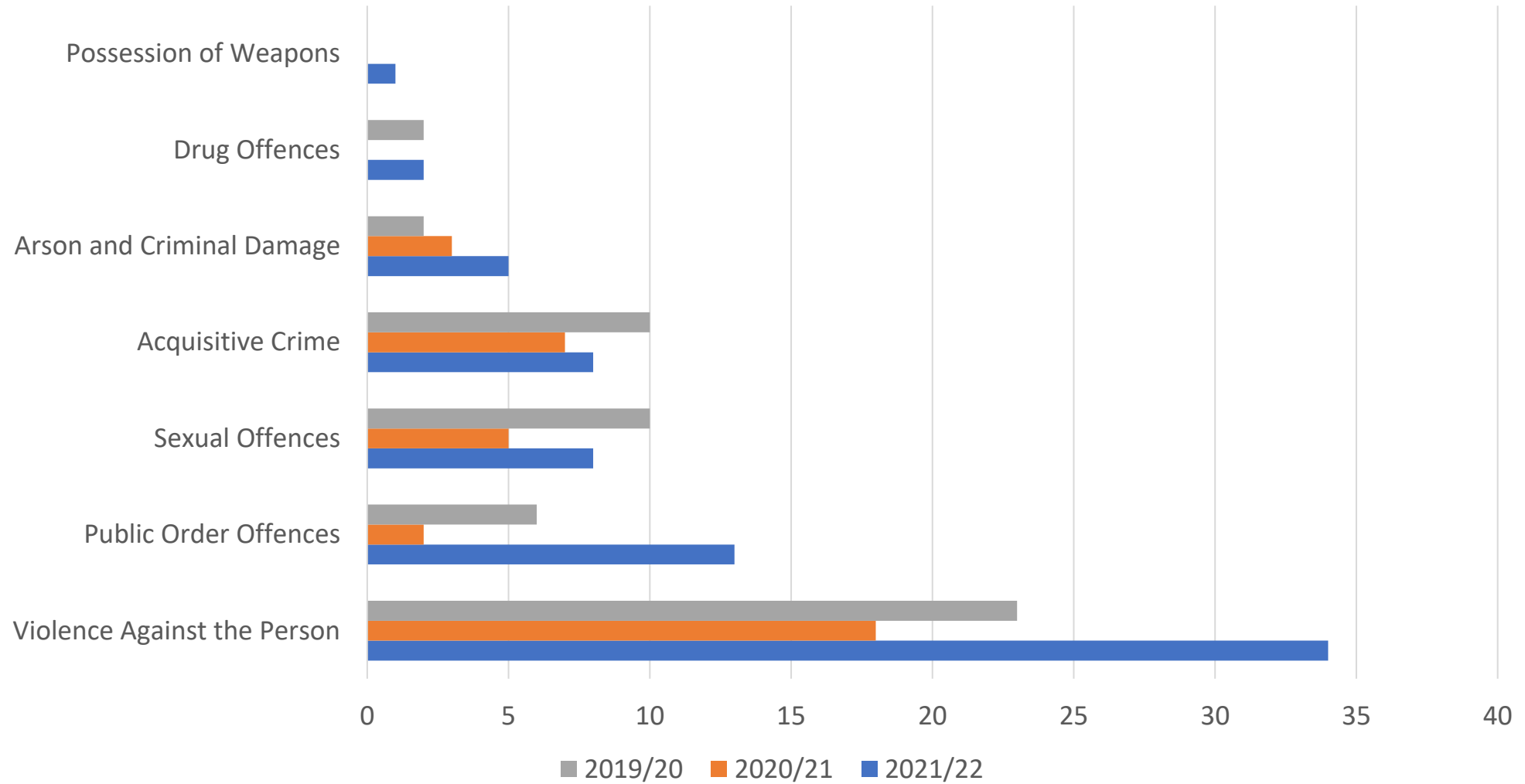
Number of street-based alcohol-related crimes in Croydon Town Centre in the last five years



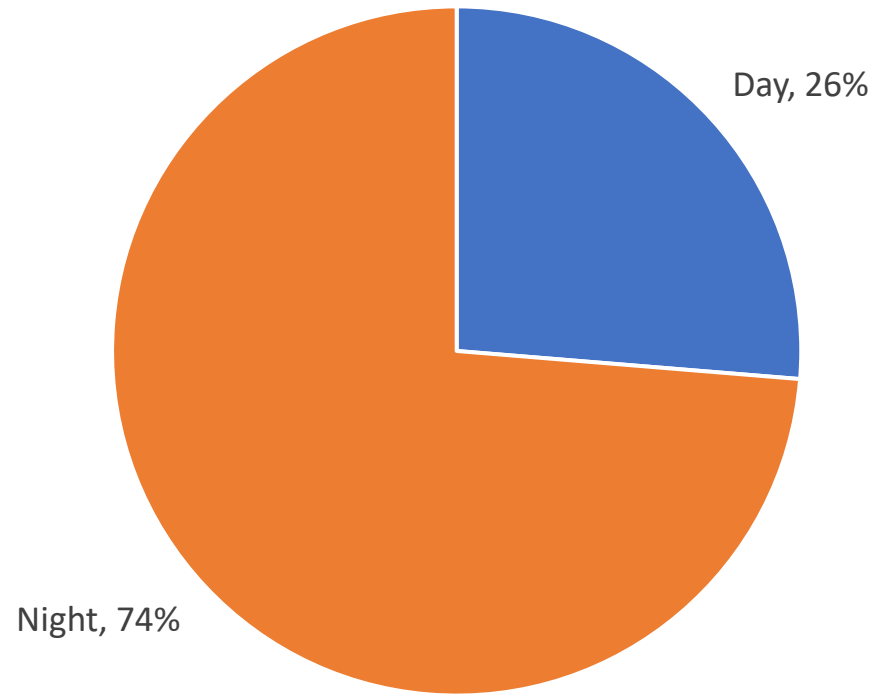
Amount of harm from street-based alcohol-related crimes in Croydon Town Centre in the last five years



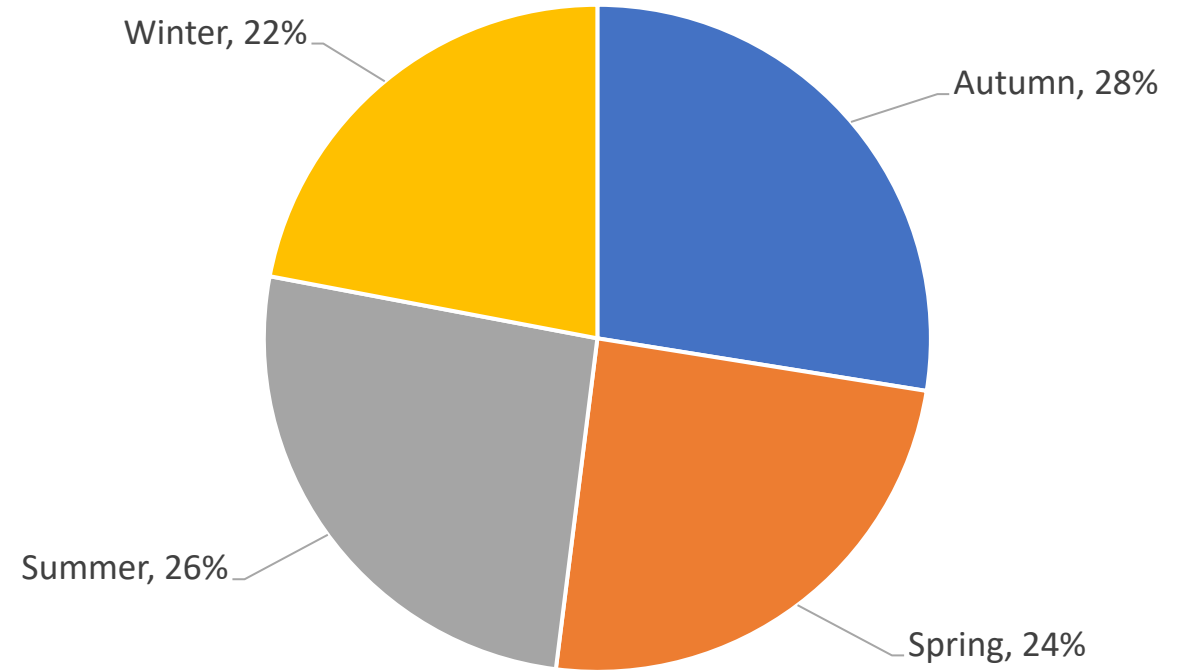
Number of street-based alcohol-related crimes by type in the last three years in Croydon Town Centre



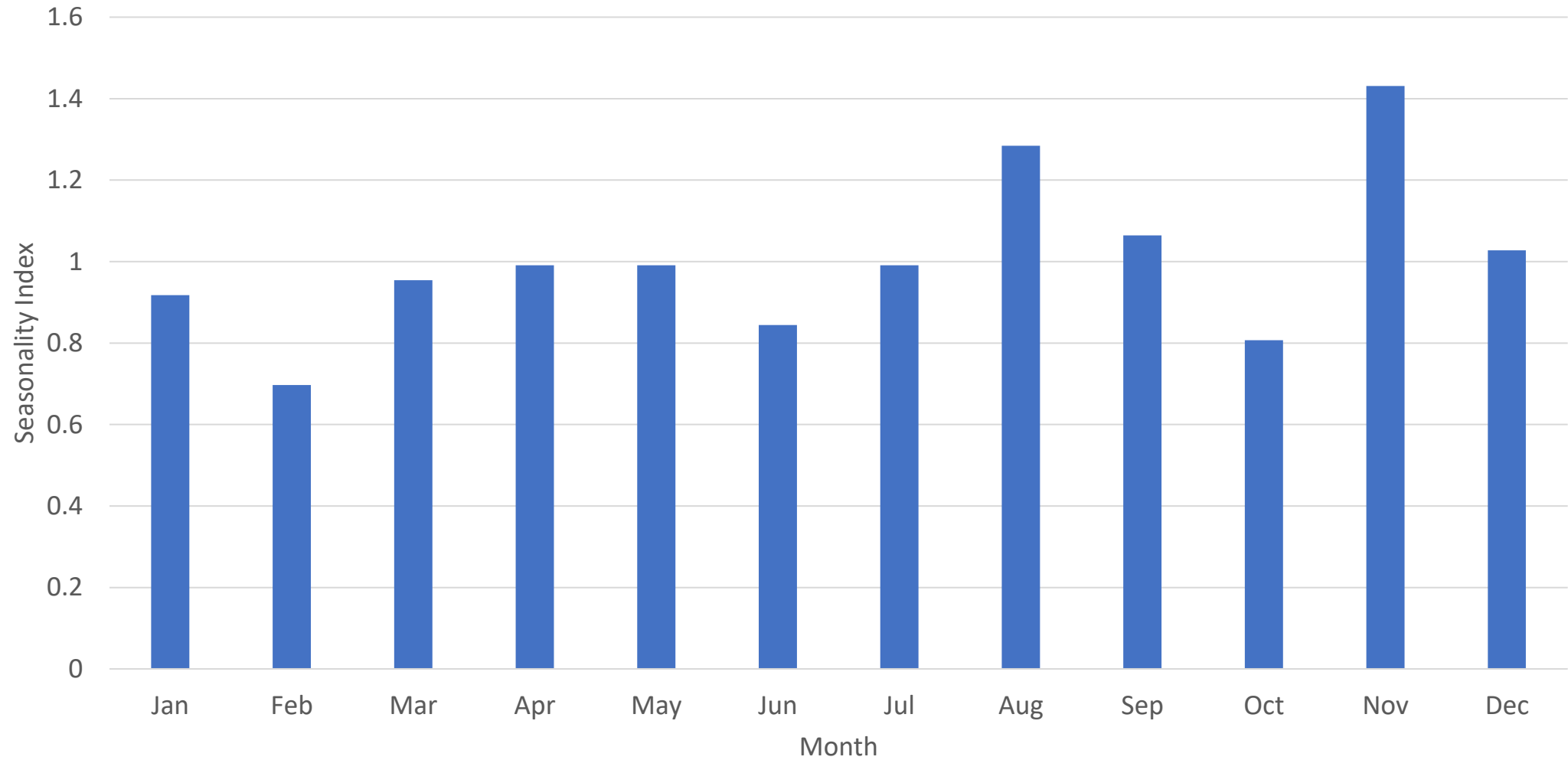
% of street-based alcohol-related crime committed during the day and night in Croydon Town Centre



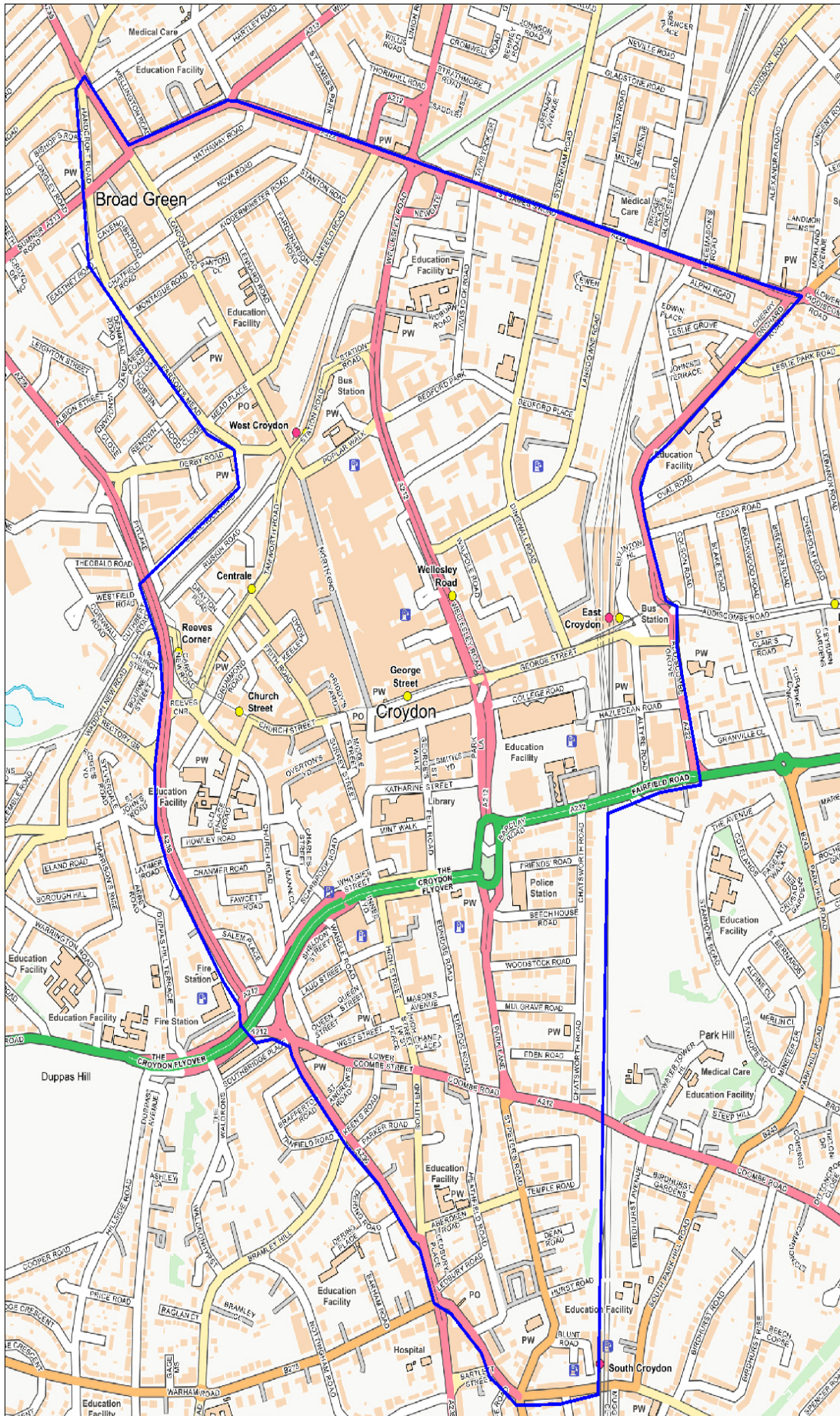
% of street-based alcohol-related crime committed by season in Croydon Town Centre



Seasonality Index - Street-based alcohol-related crime in Croydon Town Centre



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REPORT TO:	CABINET 6th July 2022
SUBJECT:	A Public Space Protection Order (PSPO) in Croydon Town Centre
LEAD OFFICER:	Nick Hibberd Corporate Director of Sustainable Communities, Regeneration & Economic Recovery Kristian Aspinall Interim Director Culture & Community Safety
CABINET MEMBER:	<i>Councillor Ola Kolade</i> Cabinet Member for Community Safety
WARDS:	<i>Specifically</i> Broad Green Fairfield South Croydon <i>Further scoping</i> All

SUMMARY OF REPORT:

Progression of a Public Space Protection Order (PSPO) in Croydon Town Centre

FINANCIAL IMPACT:

There are no significant financial impacts from the Policy identified and no additional funding is being requested. The primary cost is installing new signage through the proposed PSPO zones which is funded by the Violence Reduction Network (VRN).

KEY DECISION REFERENCE NO.: not a key decision

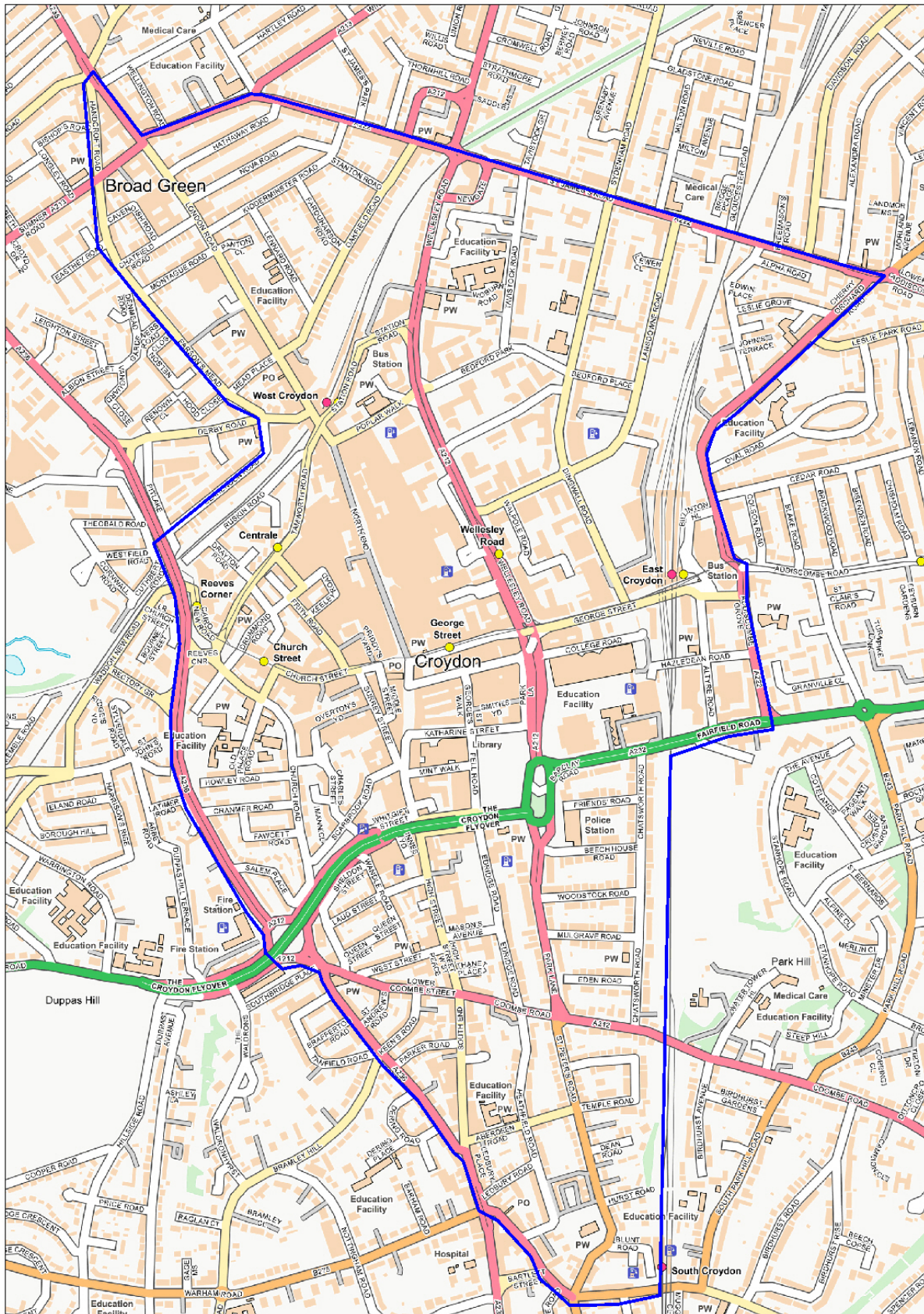
RECOMMENDATIONS:

The Executive Mayor, in Cabinet, is recommended to:

- i. To note the contents of the report and the process for implementing a Public Spaces Protection Order (PSPO) in the priority neighbourhoods
- ii. To authorise consultation with members of the public and partners on implementing a PSPO in the Town Centre and surrounding areas
- iii. To receive further reports on proposed PSPOs for other hotspot areas, including New Addington, following the Crime and Disorder Strategic Needs Assessment later in 2022

1. DETAIL OF YOUR REPORT

1.1 Progression of a Public Space Protection Order (PSPO) in Croydon Town Centre.



2. EXECUTIVE SUMMARY

- 2.1 On 20 October 2014 the Anti-Social Behaviour Crime and Policing Act 2014 (“the Act”) came into force. This Act introduced several tools and powers for use by councils and the police to address anti-social behaviour (ASB) in their local areas. These tools, which replaced and streamlined a number of previous measures, were brought in as part of a Government commitment to put victims at the centre of approaches to tackling ASB, focussing on the impact behaviour can have on both communities and individuals, particularly on the most vulnerable. This act introduced the powers available to the police and local authorities to deal with anti-social behaviour. One of these measures is the use of Public Space Protection Orders (PSPO).
- 2.2 On the 18th December 2017, Croydon implemented a PSPO that covered the Town Centre and remained in force for a period of three years. The PSPO had been used by members of the Safer Croydon Partnership to tackle anti-social behaviour and street drinking in the Town Centre.
- 2.3 The PSPO granted in 2017 for the Town Centre had two prohibitions listed, which were:
- i. Being in possession of an open container of, or consuming alcohol, save in premises falling within section 62 of the ASBCPA 2014.
 - ii. Behaving in a manner, either as an individual or within a group of people, which is likely to cause harassment, alarm or distress

Please refer to Appendix A for the Town Centre PSPO Order 2017.

- 2.4 The original PSPO lapsed in 2020. This was due to a perceived reduction in ASB and a lack of recorded evidence that it was being used at the time.
- 2.5 As part of the Mayor’s commitment to working with the Police to tackle Crime and Disorder across the Borough, we are proposing to consult on bringing this PSPO back into effect across a wider area than before. This will provide another tool for Police and Council Officers to make our public spaces free from anti-social behaviour and stop ongoing harassment and disorder. We will work with the Police to ensure use of the power is recorded throughout the lifespan of the PSPO should it be implemented.
- 2.6 This proposal is based on our recent Community Safety Strategy 2022 which highlights Croydon Town Centre as one of our major hotspots for ASB and crime and disorder.
- 2.7 This PSPO is one part of our wider plan to make our Town Centre safer and more welcoming as part of the Mayor’s commitment to tackling crime and disorder in Croydon and supporting the Police in their work in Croydon. It is a

priority for all the statutory partners in the borough to reduce ASB and disorder in key areas, including Croydon town centre.

3. PUBLIC SPACE PROTECTION ORDERS

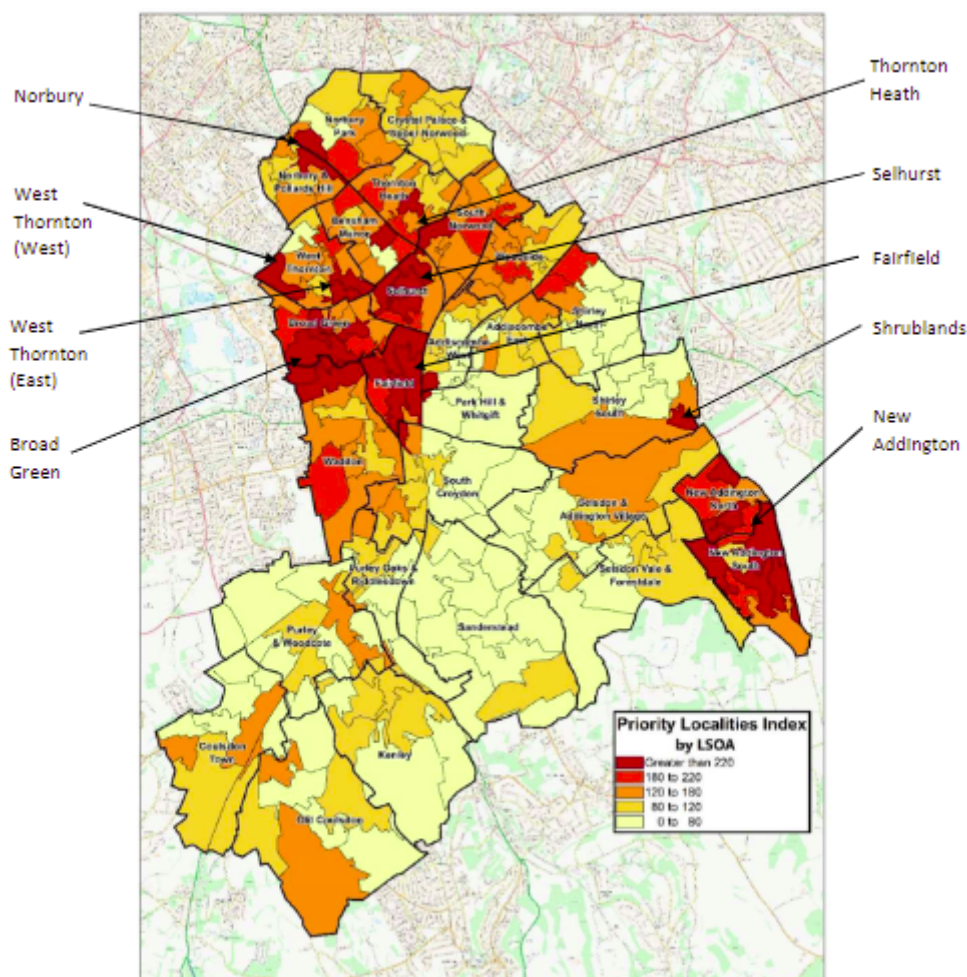
- 3.1 PSPOs are intended to deal with a particular nuisance or problem in a particular area where the behaviour is detrimental to the local community's quality of life, by imposing conditions on the use of that area. These can apply to everyone who uses that area or can be specifically structured to apply only to certain groups or categories of person, at different times or in specified circumstances. The Council is responsible for making a PSPO although the police also have enforcement powers.
- 3.2 The Council can make a PSPO if satisfied, on reasonable grounds that the following conditions are met in relation to the activities sought to be regulated:
- That they are or are likely to be carried on in a public place within the Borough;
 - That they have had, or are likely to have, a detrimental effect on the quality of life of those in the locality;
 - The effect, or likely effect of the activities is likely to be, persistent or continuing in nature;
 - Is or is likely to be such as to make the activities unreasonable; and
 - justifies the restrictions sought to be imposed by the order.
- 3.3 In addition to the specific statutory consultation requirements, the Council has to adhere to the publication requirements which form part of the Anti-Social Behaviour, Crime and Policing Act 2014 (Publication of Public Spaces Protection Orders) Regulations 2014 ("The regulations"). These specify both advertising requirements and the need for notification to be placed on land affected.
- 3.4 If made, details of the making of a PSPO will have to be made available on the Council's website and notification is required to be placed on the land affected in such a manner as to bring the order to the notice of persons using the restricted land. Any variation or discharge of the orders must be similarly publicised.
- 3.5 Should the PSPO be implemented the Council will work with the Police to ensure that front-line officers are aware of the power and how to use it, to maximise the impact of the PSPO.
- 3.6 A breach of the PSPO is a criminal offence, which can be dealt with, either by way of a fixed penalty notice (FPN) or prosecution. If prosecuted, an individual could be liable for a fine. Only those aged over 18 can be issued with a FPN.
- 3.7 Any PSPO introduced is only valid for three years and must thereafter be extended if still required. Such extension is subject to the Council being satisfied that it is reasonable and necessary to do so and is subject to the same

publication requirements as the introduction of a PSPO. The extension period is also restricted to a maximum of three years.

4. PRIORITY NEIGHBOURHOODS

4.1 The Safer Croydon Partnership is the statutory partnership that brings together the Police, Council, Health, Probation, and Fire Brigade to tackle crime and disorder in Croydon. The Partnership uses data and intelligence to identify the key issues facing the borough and then commits resources through a partnership plan and strategy to tackle those issues.

4.2 In January 2022, the Safer Croydon Partnership produced their Community Safety Strategy and one theme highlighted was to “*Focus on high priority neighbourhoods*”, this theme was based on the findings of the Strategic Assessment of 2021. This aligns with the Mayor’s commitment to working in partnership with the Police to tackle crime and disorder in the borough. The Strategic Assessment highlighted areas that require a holistic partnership-led approach, the areas identified can be seen on the map below.



4.3 The Strategic Assessment highlighted that the Town Centre which included parts of Broad Green was one of the areas we should focus resources. The Strategic Assessment stated that:

“Croydon Town Centre is the primary hotspot in the borough with 16% of all crime and 18% of all harm in the borough being committed here, which only geographically covers around 2% of the borough. Within this area, 68% of all offences and 61% of harm in the area is street-based. By breaking down all crime by type, the following is committed in the town centre:

- *Violence against the person: 15% of offences and harm in the borough is committed in this area.*
- *Domestic Abuse: 10% of offences and 13% of harm in the borough is committed in this area.*
- *Serious Youth Violence: 18% of offences and 15% of harm in the borough is committed in this area.*
- *Knife Crime: 20% of offences and 17% of harm in the borough is committed in this area.*
- *Non-DA VWI: 20% of offences and 16% of harm in the borough is committed in this area.*
- *Hate Crime: 19% of offences and 23% of harm in the borough is committed in this area.*
- *Drugs offences: 25% of offences and 26% of harm in the borough is committed in this area.*
- *Public order: 19% of offences and 24% of harm in the borough is committed in this area.*
- *Robbery: 26% of both offences and harm in the borough is committed in this area.*
- *Theft: 25% of offences and 16% of harm in the borough is committed in this area.*

4.4 As a result of the recommendations in the Strategic Assessment, we have initially investigated street-based alcohol-related crime in the Croydon Town Centre, further scoping for other areas is required. The findings can be found in Appendix B. The key findings are:

- Increase in the number of street-based alcohol-related crimes in Croydon Town Centre in 2021/22
- Increase in % of street-based alcohol-related crime in Croydon committed in Croydon Town Centre
- Increase in Violence Against the Person that is alcohol related

4.5 Members of the Safer Croydon Partnership have also highlighted that street drinking is having an adverse effect on the public and several complaints have been received by partners from local businesses, residents and visitors to the area. Residents have stated that they feel unsafe and intimidated by the anti-social behaviour they have witnessed.

- 4.6 A PSPO will enable the Council and Police to tackle the visible issues of street drinking and anti-social behaviour in the area, thereby reducing incidents of anti-social behaviour with the aim of improving public confidence and increasing the public perception of safety in a key economic and cultural centre for the borough for residents from the across the borough, as well visitors and commuters from outside of the borough.
- 4.7 Should the PSPO be implemented we will review the area covered after two months to ensure that displacement is not occurring. Should direct displacement be occurring in areas immediately outside the impacted area we will look to increase the area covered by the PSPO.
- 4.8 This is part of our ongoing partnership with the Police to reduce crime and disorder, tackle anti-social behaviour and make Croydon a welcoming destination for residents and visitors alike.
- 4.9 We will identify further opportunities to use PSPOs to tackle disorder in Croydon across the borough through our ongoing data and intelligence work. Those proposals will be brought back to the Mayor for discussion and agreement in the near future as soon as the evidence is available.

5. CONSULTATION

- 5.1 There is a requirement on the Council to consult when implementing or varying a PSPO. The specific wording of the Act sets out that: Local Authorities are obliged to consult with:
- a) The chief officer of police, and the local policing body, for the police area that includes the restricted area (the Metropolitan Police have agreed that this should be the Police Borough Commander);
 - b) Whatever community representatives the local authority thinks it appropriate to consult;
 - c) The owner or occupier of land within the restricted area;
- 5.2 We will also be consulting directly with local Ward Councillors in the three wards affected.

6. NEXT STEPS

- 6.1 The Council would like to conduct a formal 6-week consultation to allow residents and visitors to provide their comments and to provide feedback on a PSPO covering a geographical area, in and around the Town Centre. A public consultation would be made available via our partners in the voluntary sector to engage with groups likely to be affected. It is proposed the initial consultation will be in relation to a PSPO for the Town Centre area.
- 6.2 Then if the data demonstrates that there is a need for one or more additional PSPO's in the priority neighbourhoods, we will bring further reports forward presenting the evidence and reasoning for each proposal. We know that New

Addington is one of our priority areas and will be looking specifically at use of a PSPO in this area in Summer 2022

7. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 7.1 The Council has a duty to do all that it reasonably can to prevent crime and disorder in its area and work towards delivering the objectives of the Safer Croydon Partnership plan. The implementation of any PSPO assists the Council with meeting these requirements by providing the Council and Police with additional powers to tackle the issues identified.

8. OPTIONS CONSIDERED AND REJECTED

- 8.1 Do Nothing – the Police team and Council will continue to issue Community Protection Notice Warnings (CPNW) in order to try and prevent the behaviour from taking place

9. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

a. Revenue and Capital consequences of report recommendations

- 9.1 There are limited capital or revenue implications associated with this report. There are no significant financial impacts from the Policy identified and no additional funding is being requested.
- 9.2 The primary cost if we were to proceed with a PSPO would be installing new signage through the proposed PSPO zone and would be met from existing budgetary provision. This will cost approximately £6000.

b. The effect of the decision

If we were to work towards introducing a new PSPO this will enable the Council and its partners to utilise additional powers to tackle street based anti-social behaviour within the selected areas. This is in accordance with delivering against the priorities within the Safer Croydon Strategy. This will in turn support the borough's ability to attract new businesses and residents to the area. The effect of implementing a new PSPO will not result in an increase in Council and Police resources which will remain the same. The team and partnership governance framework already exists that will absorb and deliver this work so there is little or no financial impact.

c. Risks

The area that the PSPO covers must be considered as part of the consultation and data collection, as the Council must evidence that there is a significant nuisance or problem in a specific area that is detrimental to the local community's quality of life. Having a larger PSPO may leave the Council open to challenge if

it cannot evidence the need and will stretch the Safer Croydon Partnership resources available to enforce the PSPO, thereby potentially diluting its impact and adversely influencing public perception on the efficacy of PSPOs as a response to anti-social behaviour.

If we do pursue a new PSPO it will be important to ensure that its scope and the process for introduction is in accordance with the powers and requirements of the 2014 Act. Any challenge to a PSPO would have to be made by an interested person by way of an application in the High Court for permission to seek a Judicial Review. That application must be made within six weeks of the PSPO being made. An interested person is someone who lives in, regularly works in, or visits the restricted area. A person who receives an FPN due to a breach of PSPO can also challenge the validity of the order. This means that only those who are directly affected by the restrictions have the power to challenge. This right to challenge also exists where an order is varied by a council. Interested persons can challenge the validity of a PSPO on two grounds. They could argue that the council did not have power to make the order, or to include particular prohibitions or requirements. In addition, the interested person could argue that one of the requirements (for instance, consultation) had not been complied with. When the application is made, the High Court can decide to suspend the operation of the PSPO pending the verdict in part or in totality. The High Court can uphold the PSPO, quash it, or vary it.

The Council will have to take measures to mitigate against these risks by for example embarking on a full consultation process, publishing the proposed order and map and putting in place measures to publicise the PSPO through street signage and an intention to publish the final Order on the Council website in accordance with the act.

d. Options

- Approve the consultation of a new PSPO
- Do not approve the consultation of a new PSPO, which may have reputational impact for the community safety partners who have requested assistance in tackling the behaviour exhibited. Failure to introduce the new PSPO may continue to inhibit the Council's ability to make use of new powers to tackle anti-social behaviour in the town centre.

e. Future savings/efficiencies

There are no savings or efficiencies associated with this report

Approved by: Gerry Glover, Head of Finance – Sustainable Communities, Regeneration & Economic Recovery

10. LEGAL CONSIDERATIONS

The Head of Litigation and Corporate Law comments on behalf of the interim Director of Legal Services that:

The Anti-Social Behaviour, Crime and Policing Act 2014 provides the Council with powers to combat anti-social behaviour. The Council needs to ensure that the powers are used in a reasonable, consistent, appropriate and proportionate manner and must comply with the consultation requirements set out in this report.

Approved by Sandra Herbert, Head of Litigation and Corporate Law on behalf of the interim Director of Legal Services & Deputy Monitoring Officer

11. HUMAN RESOURCES IMPACT

There are no staffing implications or any other HR impact arising from this report or from this decision. If any issues arise these will be managed under the Council policies and procedures.

Approved by: *Jennifer Sankar, Head of HR, Housing and Sustainable Communities, Regeneration and Economic Development Directorates, for and on behalf of Dean Shoesmith, Chief People Officer*

12. EQUALITIES IMPACT

12.1 The Council has a statutory duty to comply with the provisions set out in the Equality Act 2010. In summary, the Council must in the exercise of all its functions, “have due regard to” the need to comply with the three arms or aims of the general equality duty. These are to:

- eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Act;
- advance equality of opportunity between people who share a protected characteristic and people who do not share it; and
- foster good relations between people who share a protected characteristic and people who do not share it.

12.2 Having due regard means to consider the three aims of the Equality Duty as part of the process of decision-making. This means that decision makers must be able to evidence that they have taken into account any impact of the proposals under consideration on people who share the protected characteristics before decisions are taken.

12.3 Any proposed PSPO is likely to have a positive impact on certain protected groups such as victims of hate (gender, sexuality, religious or disability) related ASB, it will apply to the whole population and its use will be determined by the

behaviour occurring rather than the protected group. The exception is young people who cannot be issued with a FPN if they are under 18 years of age.

- 12.4 During the consultation and subsequent equality analysis data should be collated with regard to the protected characteristics of both those consulted and affected by hate crime in order to ascertain if the impact of anti-social behaviour is greater in relation to one or more protected characteristic.
- 12.5 The implementation of any PSPO should not preclude the ongoing of support and outreach services to individuals requiring assistance in the designated area. Support should also be provided to targets of domestic abuse.
- 12.6 Following the consultation, if the Council then considers whether to make the proposed PSPO, Section 72 of the Anti-Social Behaviour Crime and Policing Act 2014 will require the Executive Mayor in Cabinet as decision maker for this specific PSPO, to pay particular regard to rights of freedom of expression and freedom of assembly set out in articles 10 (the right to freedom of expression) and 11 (freedom of assembly and association) of the European Convention on Human Rights in considering the making any such order. It would also have to be concluded that the making of the proposed order was proportionate and would fulfil a legitimate aim of curbing anti-social behaviour in public places for the benefit of the law-abiding majority and hence would not infringe article 11 ECHR.

Approved by: Denise McCausland – Equality Programme Manager

13. ENVIRONMENTAL IMPACT

There is limited impact on the environment as a result of this report. Some anti-social behaviour and street drinking activity may be related to waste, noise or other issues that affect people's quality of life but the policy is principally about improving behaviour rather than the environment.

14. CRIME AND DISORDER REDUCTION IMPACT

Following the consultation, if the Council decided to make the proposed PSPO, this would provide additional powers to Council and Police officers to take action against the prohibitions listed as part of the PSPO within the designated area. This would directly support the Council in discharging its statutory duty under Section 17 of the Crime and Disorder Act 1998 to exercise its various functions with due regard to the likely effect of the exercise of those functions, and the need to do all that it reasonably can to prevent crime and disorder in its area. The proposed PSPO would also support the Council and its partners in delivering the Safer Croydon Strategy, specifically the importance to focus on high priority neighbourhoods.

(Approved by: Director of Culture & Community Safety)

15. DATA PROTECTION IMPLICATIONS

a. WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?

NO

b. HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN COMPLETED?

NO

The Director of Culture and Community Safety confirms that a DPIA will be completed as part of the process if we are to progress with the decision to implement a PSPO.

CONTACT OFFICER: Christopher Rowney, Head of the Violence Reduction Network

APPENDICES TO THIS REPORT:

Appendix A - PSPO Order 2017.

Appendix B - street-based alcohol-related crime in Croydon Town Centre

Appendix C – Map of the proposed area

BACKGROUND PAPERS

Appendix D – Community Safety Strategy

BACKGROUND DOCUMENTS – LOCAL GOVERNMENT ACT 1972

[For executive decision making it is a requirement that all Part A (open) reports & Part B reports (closed) must list and provide an electronic and a printed copy of all background reference.]

Public Space Protection Order

September 2022

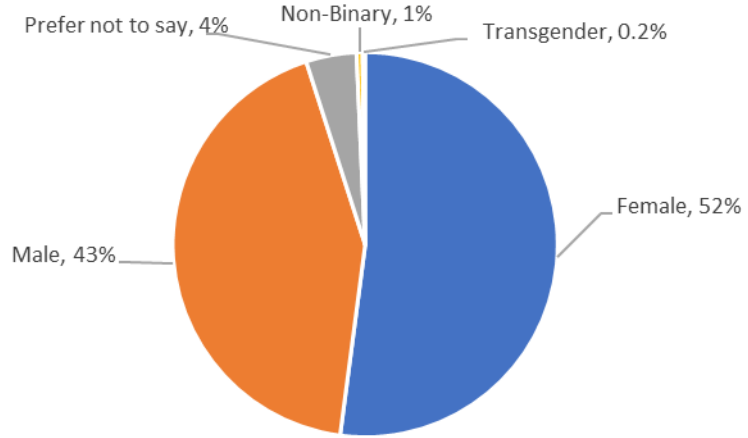
Intelligence & Performance Team – Violence Reduction Network

Main Findings

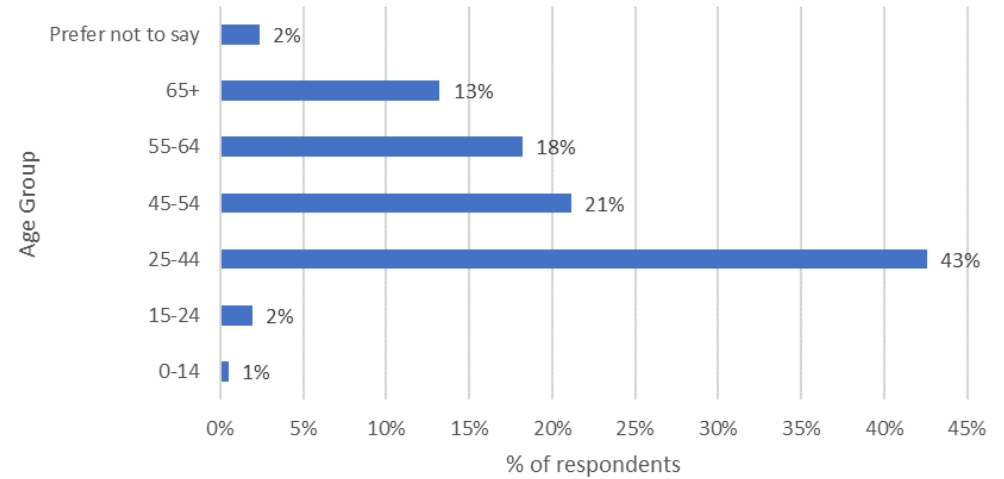
- There was a total of 1,390 respondents to the survey.
- Over 80% of respondents “definitely agree” with a PSPO in the town centre. 90% of respondents either “definitely agree” or “somewhat agree” with a PSPO.
- Over 60% of respondents “definitely agree” with the proposed area of the PSPO in the town centre. This goes up to three quarters of respondents when including those who answered “somewhat agree”.
- Around three quarters of respondents “definitely agree” that street drinking negatively impacts the town centre. This goes up to 90% when including those who answered “somewhat agree”.
- Almost half of all respondents “definitely agree” that loud noise negatively impacts the town centre. This increases to almost three quarters of respondents when including those who answered “somewhat agree”.
- Three quarters of all respondents “definitely agree” that groups causing anti-social behaviour negatively impacts the town centre. This goes up to over 90% when including those who answered “somewhat agree”.
- Over 80% of respondents have either experienced or witnessed people harassing or intimidating residents, businesses or members of the public. Over a quarter stated this was on a daily basis and a third stated it occurred on a weekly basis.
- Over 80% of respondents have either experienced or witnessed people using threatening or intimidating behaviour including verbal abuse.
- Over 90% of respondents have experienced or witnessed street drinking. Over half witnessed this on a daily basis.
- Over 80% of respondents have experienced or witnessed people acting in an anti-social manner causing harassment, alarm or distress. 70% of respondents witness this on a daily or weekly basis.
- Three quarters of respondents have experienced or witnessed urinating in a public place. Over a fifth witnessed this on a daily basis and over a quarter on a weekly basis.
- When asked what other issues have experienced in the town centre that are not listed, most respondents listed drug issues.

Demographics

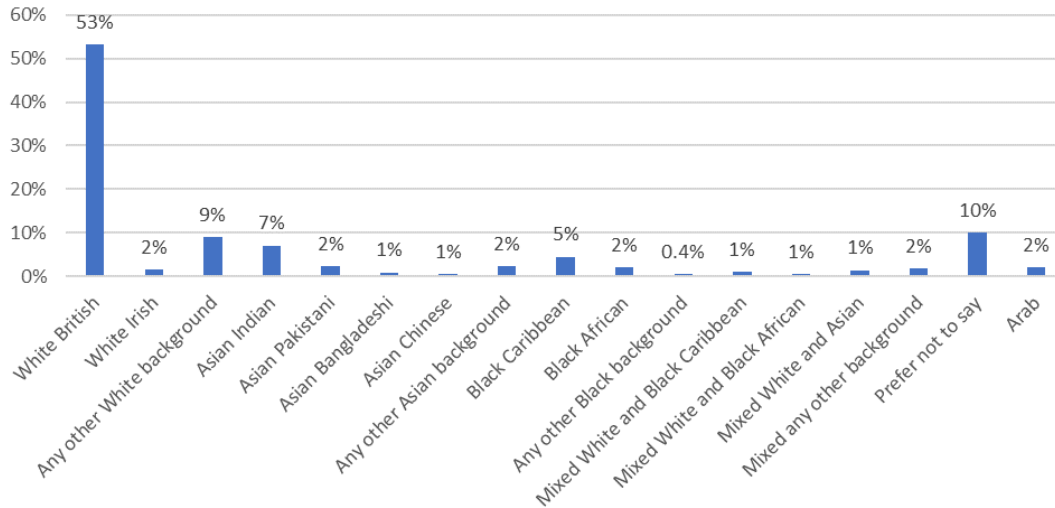
How would you describe your gender identity?



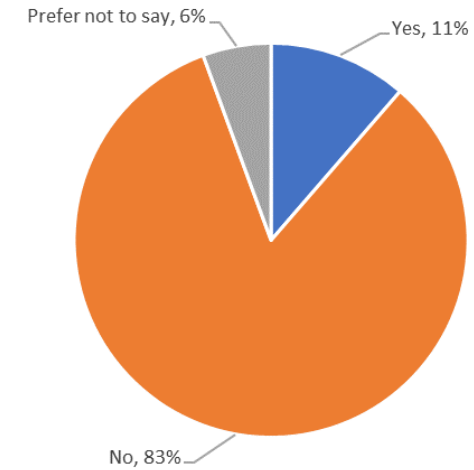
Which age group do you belong to?



What is your ethnicity?

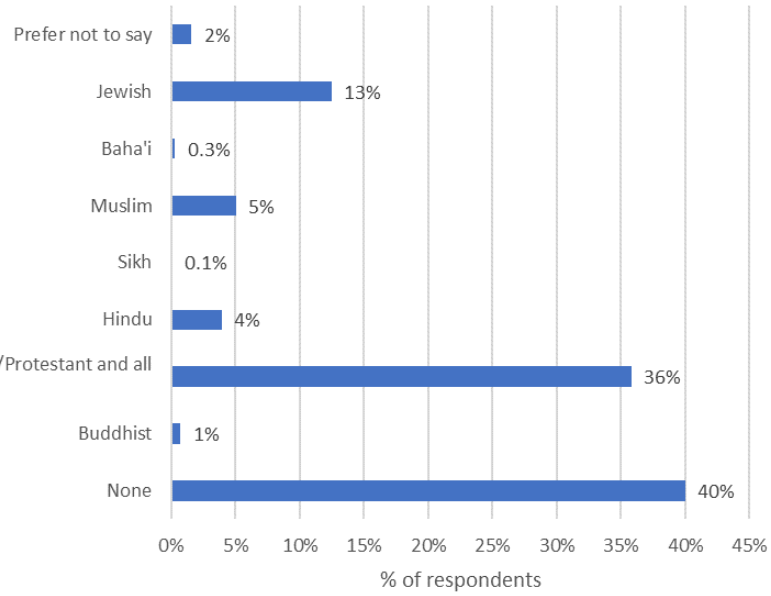


Do you have any disabilities?

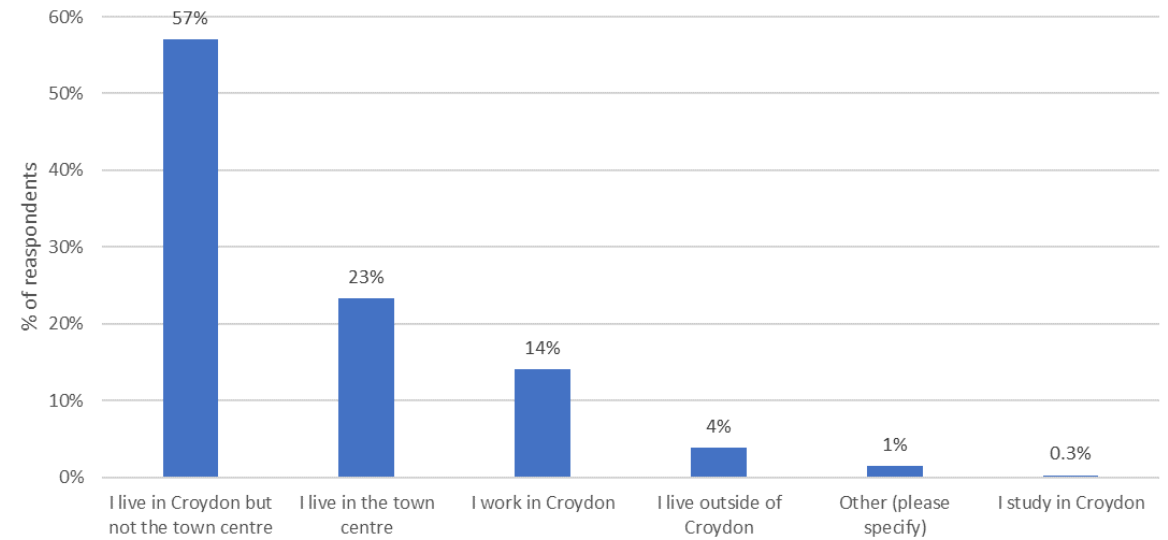


Demographics Cont.

What is your religion?

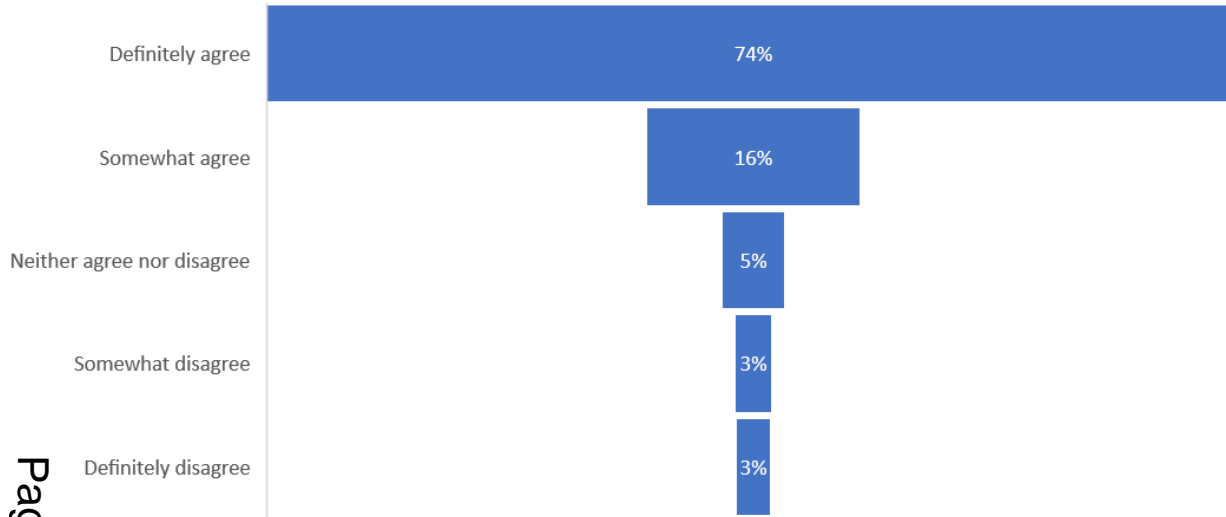


Which statement best applies to you?

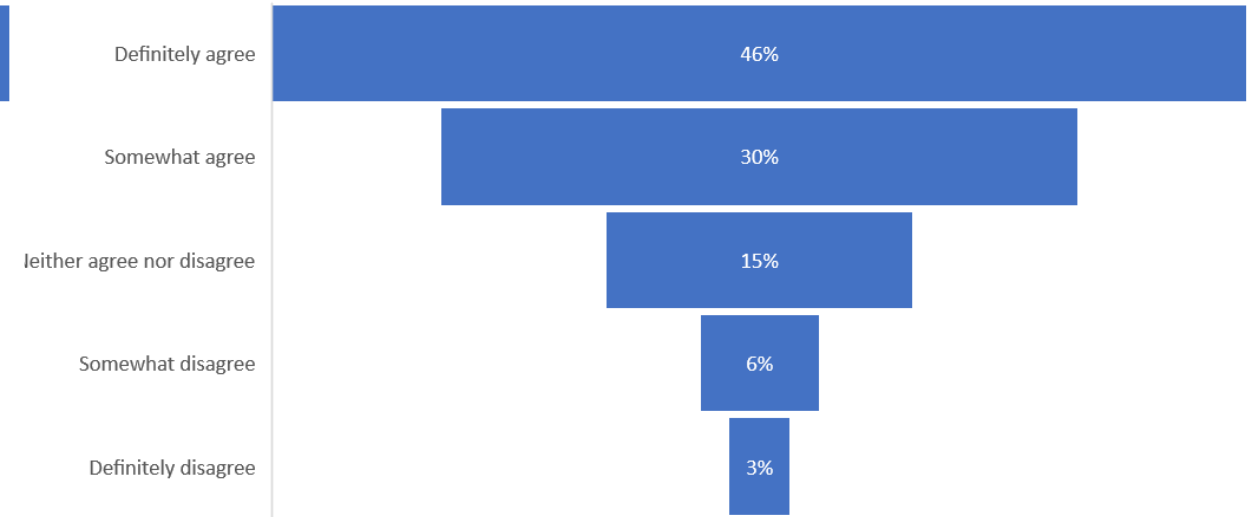


PSPO-specific questions

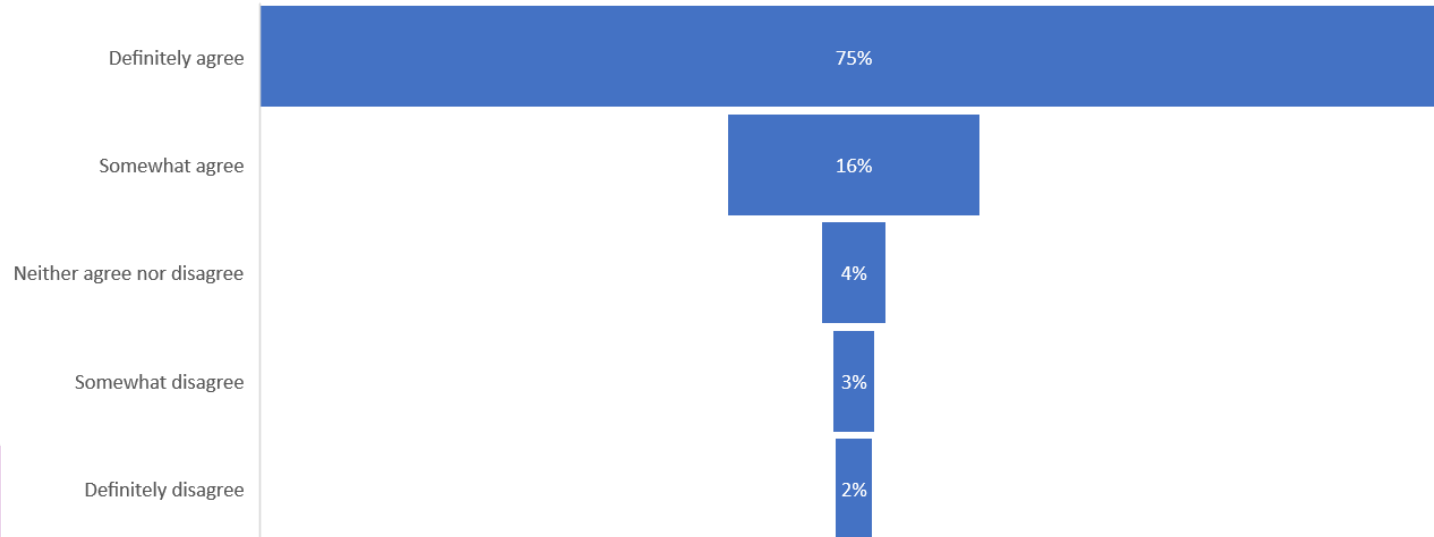
How strongly do you agree or disagree that Croydon town centre is negatively affected by street drinking?



How strongly do you agree or disagree that Croydon town centre is negatively affected by noise e.g. loud music?

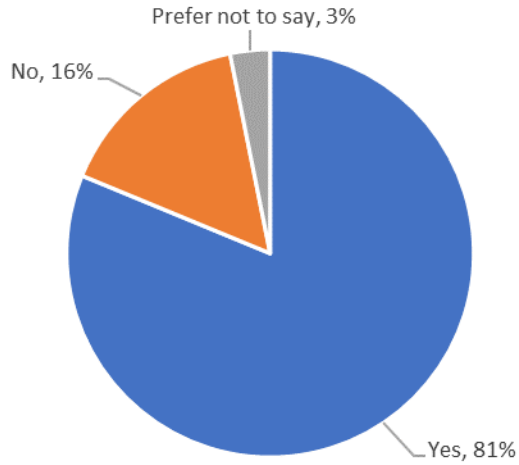


How strongly do you agree or disagree that Croydon town centre is negatively affected by groups of people causing anti-social behaviour (harassment, alarm or distress to others)?

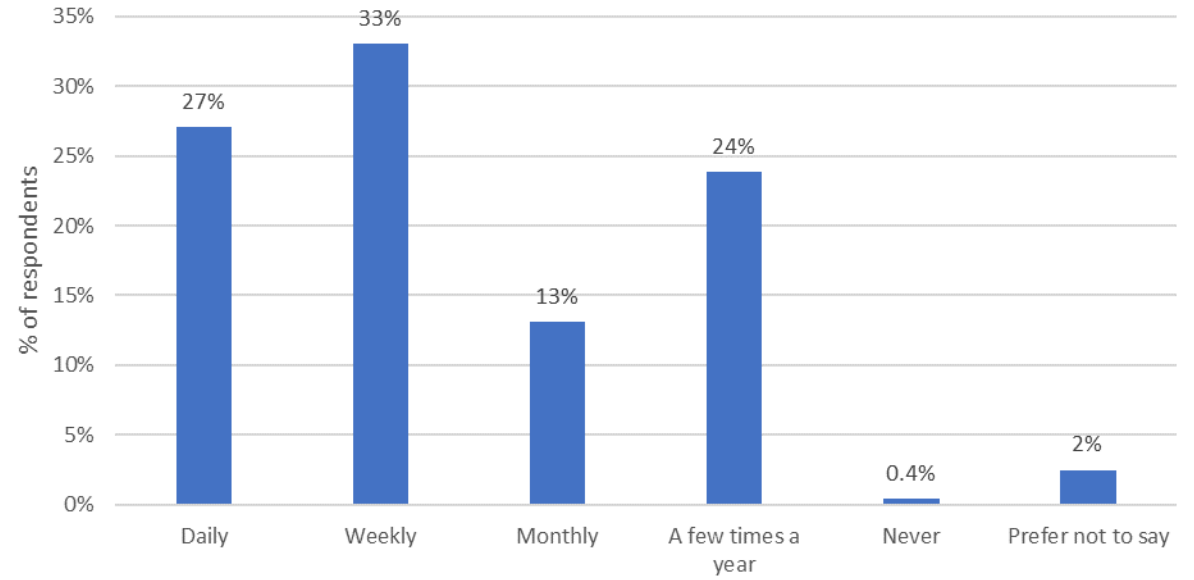


PSPO-specific questions (from left to right)

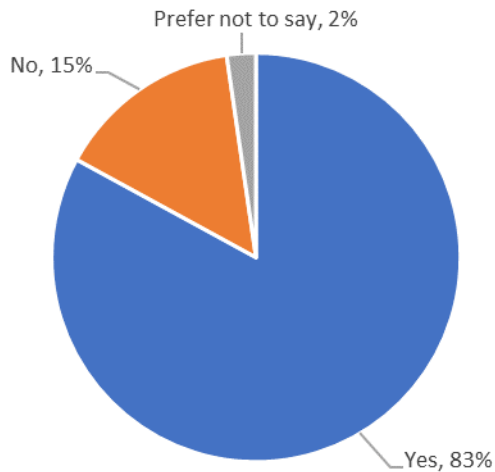
Have you experienced or witnessed people harassing or intimidating residents, businesses or members of public?



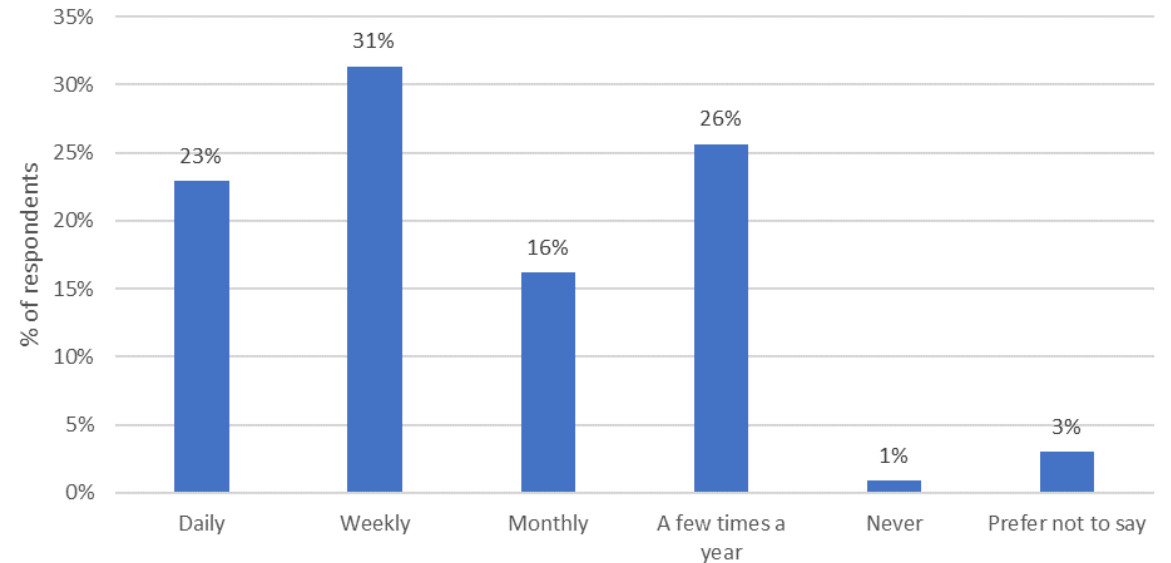
How often have you experienced this issue?



Have you experienced or witnessed people using threatening or intimidating behaviour including verbal abuse?

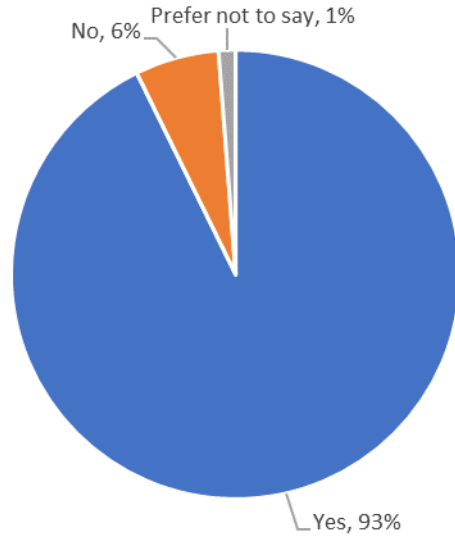


How often have you experienced this issue?

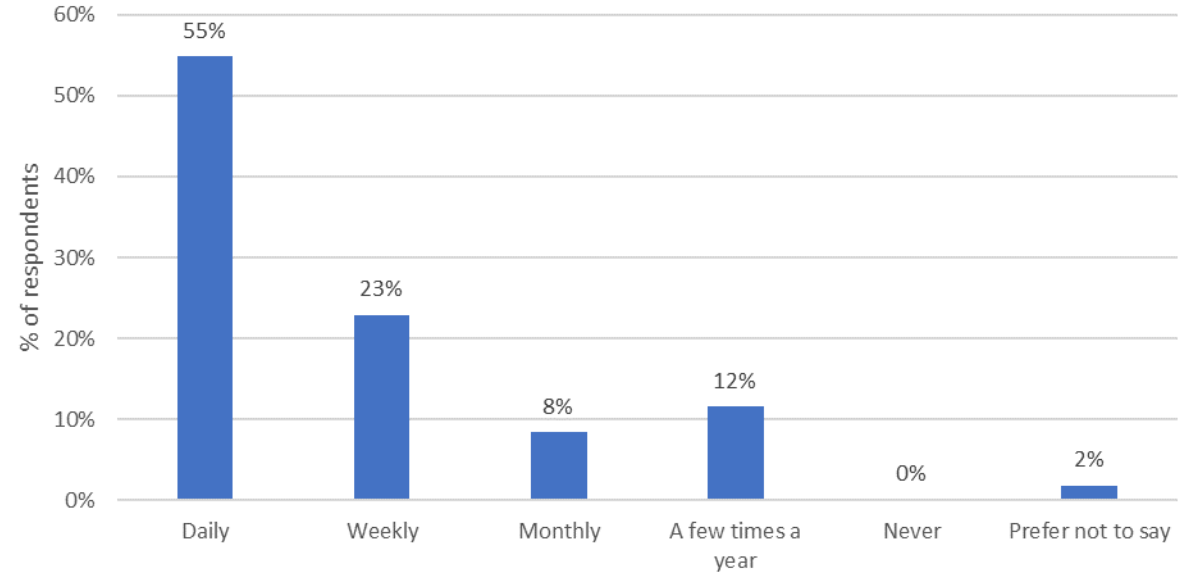


PSPPO-specific questions (from left to right)

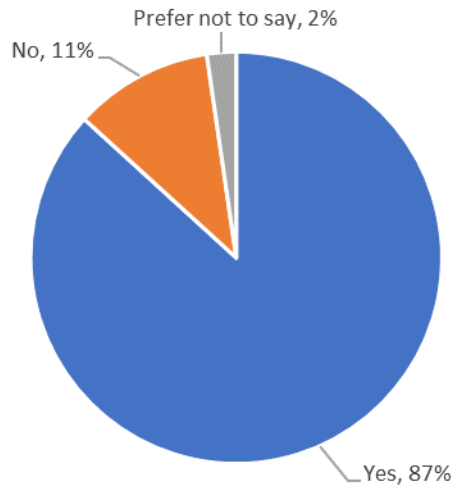
Have you experienced or witnessed people street drinking?



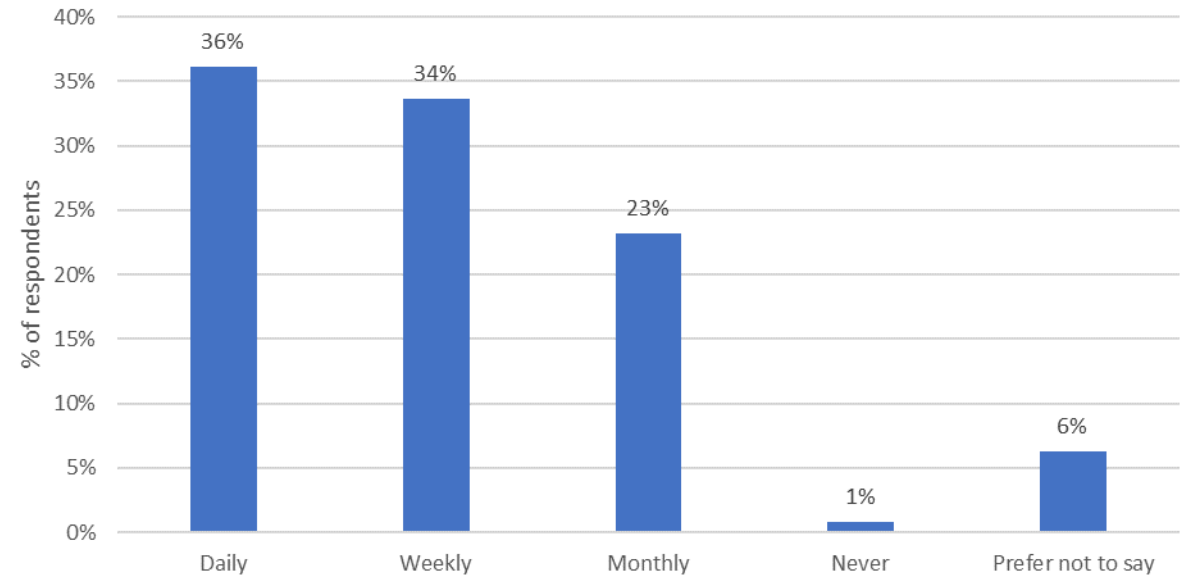
How often have you experienced this issue?



Have you experienced or witnessed people acting in an antisocial manner that causes harassment, alarm or distress??

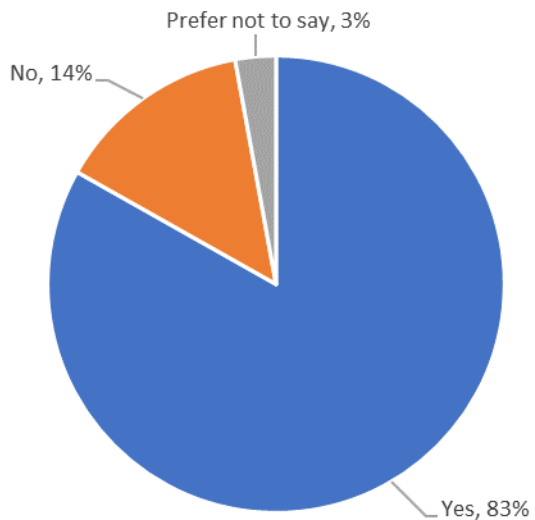


How often have you experienced this issue?

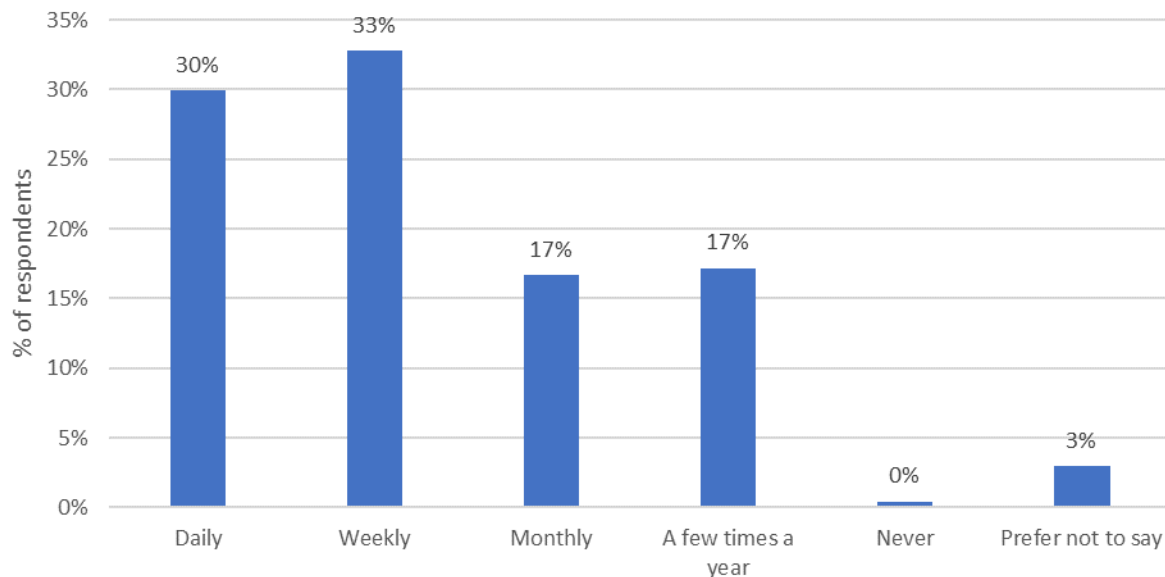


PSPO-specific questions (from left to right)

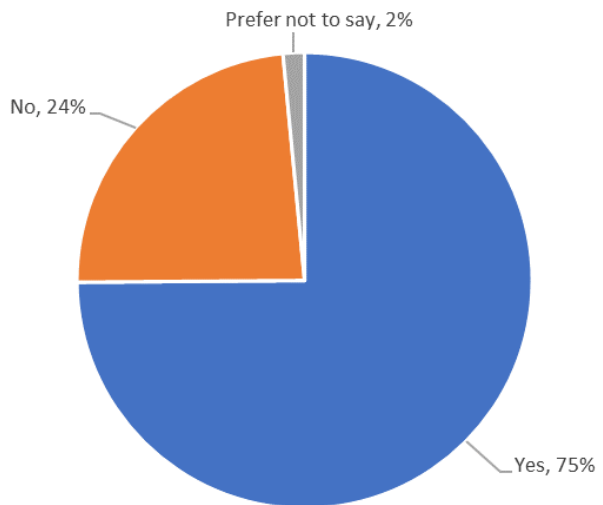
Have you experienced or witnessed two or more people acting in a manner you think likely to cause harassment, alarm or distress?



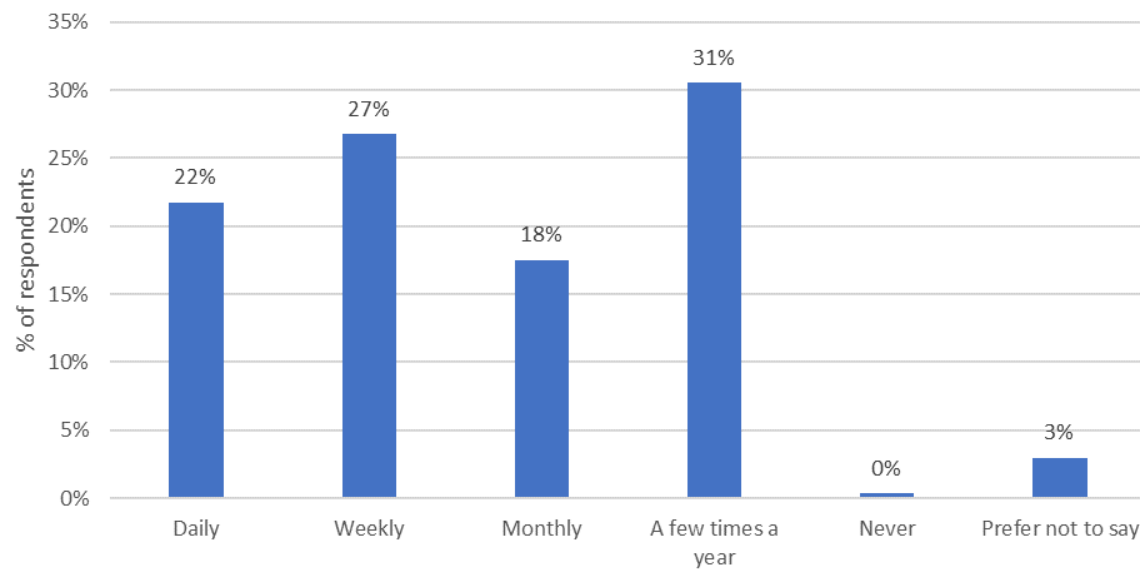
How often have you experienced this issue?



Have you experienced or witnessed people urinating in a public place?

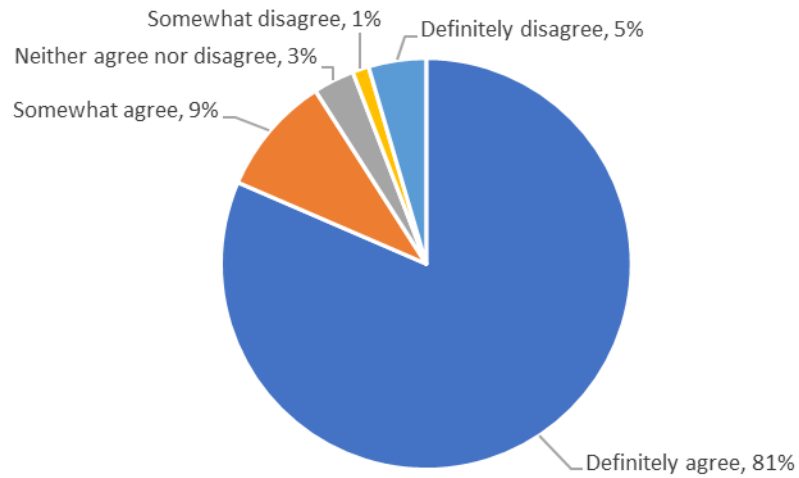


How often have you experienced this issue?

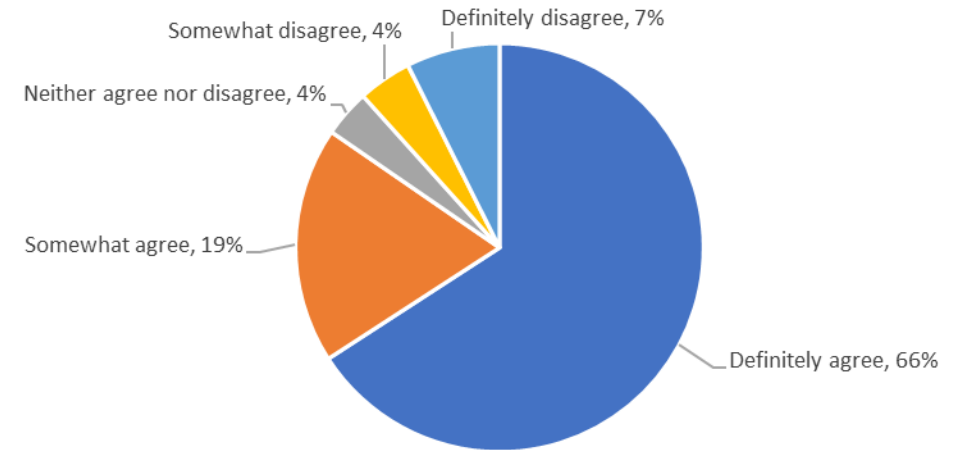


PSPO-specific questions (from left to right)

How strongly do you agree or disagree with the need for a PSPO in the town centre?



How strongly do you agree or disagree with the proposed area for Croydon town centre PSPO?





RESOLVE: Putting Safety First

Croydon BID – ASB Impacts on Town Centre

Croydon Business Improvement District (Croydon BID) is an independent business led, and business funded organisation representing circa 535 of the largest businesses across Croydon Town Centre.

With the support of Croydon BID levy payers from the retail, commercial, leisure, hospitality and public sectors, we have a vision for Croydon to become one of the most sustainable, welcoming, vibrant and culturally diverse locations in south London.

Croydon BID invests £900,000 per annum, delivering initiatives and much needed services that would not otherwise exist to support the business community and enhance the prosperity of the town.

Croydon BID has recently secured the support of local businesses with a 'YES' vote achieved at the latest BID Ballot, with 91% of business voting in favour by number and 95% in relation to rateable value, demonstrating a strong mandate of support from the business community.

This support means that Croydon BID will operate for a further 5-year term, running from 1st April 2022 until 31st March 2027, delivering on an ambitious yet realistic business plan proposal which aims to meet the current and future challenges of the town, as identified by local businesses.

Ensuring the safety and wellbeing of everyone in the town centre is the BID's number one priority, but the experiences of our members indicate that a multitude of safety and security issues currently facing the town centre, including business crime, shoplifting, threats to staff, aggressive street begging, street drinking and antisocial behaviour, has reached unprecedented levels. All of which are detrimental to the town's reputation and its ability to attract and retain business.

As part of the recent BID ballot process, businesses were surveyed, and the following results were recorded in relation to crime and safety within the town centre (sample 158 businesses):

- 97% of businesses stated that improving feelings of safety and security for the business and their staff is a priority.
- 80% of respondents stated it was 'very important' and 17% stated it was 'important' that work is undertaken to help ensure everyone feels safe, and support efforts to tackle crime across the town centre.

Whilst significant incidents in relation to persistent low-level crime and ASB within the town centre are reported to the authorities, issues and concerns which affect a business's ongoing trade, are often reported directly to Croydon BID.

Local businesses need to be able to conduct their everyday trading in environments which are welcoming to their customers, however most of the common concerns and issues encountered are incidents related to excessive alcohol consumption and the subsequent levels of antisocial behaviour and criminality, which prevent custom and limit trade to a business and also impact on their staff and their wellbeing. These issues are apparent in both the daytime and night-time economies of the town centre.

Examples communicated to Croydon BID include:

- Hewitts - street drinkers congregating directly outside the premises, harassment of staff and customers and their land being used as a toilet. This has been a long term issue which the BID has worked with partners on to resolve.

- The Spread Eagle Pub - customers continuously harassed, approached for money, drinks and cigarettes whilst enjoying meals and drinks in their licensed outside seating area.
- Holiday Inn Express – street drinkers congregating at Priddy's Yard behind Holiday Inn Express, impacting guests at the hotel, thus impacting their reviews, which subsequently effect ongoing business and bookings owing to experiences when staying at the hotel.
- Whitgift underpass - reports of harassment, alarm, and distress by a wide variety of people over the course of 6 months, with the location having significant economic impacts on businesses.

Large antisocial groups are also found in many of the public spaces across the town centre, which in some cases has affected a business's day to day operations to such an extent, that it's reduced their capacity and means to trade.

An example of this relates to Nando's restaurant, who have ceased to operate their outdoor dining space due to the significant issues encountered outside of their premises. Removing this seating option directly impacts the number of covers they can serve and therefore the profitability of the business. Further to this, the business has also taken the extreme step to hire permanent door security to prevent access to the premises during the day and to safeguard their customers and staff.

These changes to their operations over the last couple of months are a direct result of the antisocial behaviour and the groups occupying the High Street.

The perception of the Croydon Town Centre, is currently one which portrays a lack of control and management. Persons are able to conduct themselves in an anti-social manner and as they want, often unchallenged in many spaces and locations which directly affect members of the public.

At a time when the town centre is trying to recover from the pandemic, these negative experiences and perceptions of the town centre, are having a detrimental effect on the prosperity of the town centre. Many businesses are considering the future operations, and issues such as this are a factor they are considering with regards to their future presence in the town centre.

General ASB Statement – June 2022

Shaun Webster
Director of Operations
Croydon Business Improvement District (BID)



12-10-2022

From a policing perspective, the PSPO in Croydon Town Centre will greatly benefit our officers, especially our town centre team and ward officers by supporting them with additional legislation to target street drinking and anti-social behaviour. This will help to reduce crime and disorder and the perception of crime and disorder in and around the town centre and make our community and businesses safer.

Our priority is to reduce violence and the fear of violence, so this supports our VAWG (Violence against women and girls) strategy by making our streets safer. We will also continue to work with partners in the council and community to improve and design out crime within the PSPO footprint. The PSPO is supported by the senior leadership team at Croydon, and we look forward for it to be implemented.

- **Chief Superintendent Dave Stringer**

I like to share with you some of our experiences in the Restaurant Quarter, South End.

The main negatives we see in the area are people drinking on the streets or on benches, becoming intoxicated and our customers tell us that they feel unsafe. Unfortunately, some of these people urinate in public areas.

We also have a problem with people begging for money, especially at times when alfresco areas are in operation in the warm weather. The PSPO would be very helpful in our area, because at the moment many customers are reluctant to return and spend their money in the local bars, restaurants and other shops.

- Bagattis

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LONDON BOROUGH OF CROYDON

CROYDON TOWN CENTRE

PUBLIC SPACE PROTECTION ORDER (No.1 2022)

ANTI-SOCIAL BEHAVIOUR, CRIME AND POLICING ACT 2014, AS AMENDED

This Public Space Protection Order (Order) is made under Section 59 of the Anti-Social Behaviour, Crime and Policing Act 2014, as amended (ASBCPA 2014).

1. Croydon Council, in making this Order:-

- a. Is satisfied on reasonable grounds that:-
 - i. The activities itemised in paragraph 2, below have been carried out in a public place within the London Borough of Croydon, namely the area identified below as the Restricted Area, and have had a detrimental effect on the quality of life of those in the locality, and that:-
 - ii. The effect, or likely effect of the activities:-
 - a. Is, or is likely to be, of a persistent or continuing nature;
 - b. Is, or is likely to be, such as to make the activities unreasonable; and,
 - c. Justifies the restrictions imposed by the Order.
- b. Is satisfied that the prohibitions and requirements imposed by this Order are reasonable in order to prevent the detrimental effect referred to in paragraph 1 above from continuing, occurring or recurring, or to reduce that detrimental effect, or to reduce its risk of continuance, occurrence or recurrence.
- c. Has had regard to the rights and freedoms set out in the European Convention on Human Rights as defined in Section 21(1) of the Human Rights Act 1998, and in particular, those rights set out in Article 10 (right of freedom of expression), and Article 11 (right of freedom of assembly and association), and has concluded that the restrictions on such rights and freedoms imposed by this Order are lawful, necessary and proportionate.

THE RESTRICTED AREA

2. This Order applies to the area in the London Borough of Croydon to which the public have or are permitted access, whether with or without payment, as identified in the Schedule attached to this Order and shown in the plan attached to this Order including any street, road, footway, footpath, square, courtyard, grassed area, stairway, walkway, subway, car parks or similar.

THE ACTIVITIES

3. The Activities referred to in paragraph 1 of this Order are:-
 - a. Consuming alcohol in the restricted area other than in premises identified in Section 62 of ASBCPA 2014, as amended;
 - b. Individuals or groups of people behaving in a manner causing or likely to cause harassment, alarm or distress, in the restricted area;
 - c. Urinating in any public place in the restricted area, other than public toilets.

THE PROHIBITIONS

4. By the Order, no person shall at any time in any public place within the restricted area (the boundaries of which are shown on the plan attached to this Order) engage in any of the following prohibited activities as identified in paragraph 4(a)i, 4(a)ii and 4(a)iii of this Order:-
 - a. In the area being Croydon Town Centre as identified in Schedule 1 to the Order and the plan attached to this Order:-
 - i. Consume alcohol, or be in possession of an open container of alcohol, except in premises falling within Section 62 of the ASBCPA 2014;
 - ii. Behave in a manner, either as an individual or within a group of people, which causes, or is likely to cause harassment, alarm or distress;
 - iii. Urinate in a public place, except a public toilet, as defined by paragraph 2 of this Order.

THE REQUIREMENTS

5. Any person directed to leave the restricted area by a Police Officer, Police Community Support Officer or any other officer authorised to make such a direction by Croydon Council, shall do so. Such a direction may be given where the officer is satisfied that the person concerned has breached this Order by engaging in a prohibited activity as identified in paragraph 4 of this Order.

INFORMATION

6. By virtue of Section 63 of the ASBCPA 2014, as amended, where a constable or a person authorised by the Council or under s.69 of the ASBCPA 2014 reasonably believes that a person:

(a) is or has been consuming alcohol in breach of a prohibition in a public spaces protection order, or

(b) intends to consume alcohol in circumstances in which doing so would be a breach of such prohibition, the constable or authorised person may require a person:

(i) not to consume, in breach of the order, alcohol or anything which the constable or authorised person reasonably believes to be alcohol;

(ii) to surrender anything in a person's possession which is, or which the constable or authorised person reasonably believes to be, alcohol or a container for alcohol.

7. A constable or an authorised person who imposes a requirement under Section 63 must tell the person that failing without reasonable excuse to comply with the requirement is an offence. Such a requirement imposed by an authorised person is not valid if the authorised person:

(a) is asked by the person to show evidence of his or her authorisation, and

(b) fails to do so.

8. A constable or an authorised person may dispose of anything surrendered (namely alcohol or anything reasonably believed to be alcohol) in whatever way he or she thinks appropriate.

9. A person who fails without reasonable excuse to comply with a requirement imposed on him or her by a constable or authorised person commits an offence and is liable on summary conviction to a fine not exceeding level 2 on the standard scale (currently £500).

10. By virtue of s.67 of the ASBCPA 2014, it is an offence for a person without reasonable excuse:

(a) to do anything that the person is prohibited from doing by this Order, or

(b) to fail to comply with a requirement to which the person is subject by this Order.

11. A person guilty of an offence under this section is liable on summary conviction to a fine not exceeding level 3 on the standard scale (currently £1000).

12. A person does not commit an offence under this section by failing to comply with a prohibition or requirement that the Council did not have power to include in this Order.

13. By virtue of Section 68 ASBCPA 2014, as amended, a constable or authorised person may issue a fixed penalty notice to anyone he or she has reason to believe has committed an offence under Sections 63 or 67 in relation to a Public Space protection Order. The Fixed penalty notice offers the person to whom it is issued the opportunity of discharging any liability to conviction for the offence by payment within a specified period to the local authority of a fixed penalty. The fixed penalty may be for no more than £100.00 and may give a lower amount to be paid within a period of not less than 14 days.

13. If an interested person wishes to challenge the validity of this Order he or she may apply to the High Court within six weeks beginning with the date on which this Order is made. The grounds on which a challenge can be made are that the Council did not have the power to make this Order, or that a requirement imposed by Chapter 4 of the ASBCPA 2014, as amended was not complied with, see further section 66 of the ASBCPA 2014, as amended.

COMMENCEMENT, DURATION AND CITATION

12. This Order is made on [insert date] and shall come into force on this date. This Order shall remain in force for a period of three years.

13. This Order may be cited as the Public Spaces Protection Order for the London Borough of Croydon No.2 of 2022.

Dated

.....
Signed:

Director

CABINET REPORT TEMPLATE AND GUIDANCE

REPORT TO:	CABINET 16 November 2022
SUBJECT:	Croydon Safeguarding Children Partnership Annual Report 2021/22
LEAD OFFICER:	Debbie Jones, interim Corporate Director, Children, Young People and Education Fiona Martin, Detective Superintendent. Metropolitan Police Elaine Clancy, Chief Nurse Croydon Heath Services & Croydon CCG Kerry Crichlow, Director Quality, Commissioning and Performance Improvement
CABINET MEMBER:	Cllr Maria Gatland, Cabinet Member for Children and Young People
WARDS:	All
FINANCIAL IMPACT	
There are no direct financial implications arising from this report. This is a retrospective report. The Croydon Safeguarding Children Partnership (CSCP) operates within a budget to which partner agencies contribute	
FORWARD PLAN KEY DECISION REFERENCE NO.: <i>This is not a key decision</i>	
The Executive Mayor in Cabinet is recommended to	
1. RECOMMENDATIONS	
1.1	note the Croydon Safeguarding Children Partnership (CSCP) Annual Report for 2021-22.
1.2	note that the report provides robust evidence of the impact of the CSCP's activity to improve outcomes for children and families.

2. EXECUTIVE SUMMARY

- 2.1 Section 16G of The Children Act 2004 requires safeguarding partners to publish their arrangements to safeguard and promote the welfare of children. It also requires the safeguarding partners to prepare and publish, at least once in every 12-month period, a report on the work that they have done as a result of their arrangements, and how effective the arrangements have been in practice.
- 2.2 The CSCP Annual Report aims to:
- a) summarise both single agency activity and partnership activity to safeguard and promote the welfare of children in Croydon

- b) summarise the quality of safeguarding arrangements
 - c) evidence the effectiveness of the partnership to:
 - share learning from Safeguarding Practice Reviews
 - impact on outcomes for children
 - know what it has not achieved, and how it will address it
- 2.3 The annual report covers the financial year April 2021 - March 2022. It is a public facing document which will be published on the CSCP website.

3. CONTENT

- 3.1 The CSCP arrangements are set out on page 5 of the Annual Report. Key workstreams are overseen by the CSCP Executive and the Independent Scrutineer Eleanor Brazil, on a monthly basis.
- 3.2 The Safeguarding Practice Review Group conducted 7 Rapid Reviews (incidents where a child has been seriously injured or has died and abuse or neglect is suspected). Three of the Rapid Review are progressing as a Thematic Child Safeguarding Practice Review examining the circumstances for 7 of the young people associated with unrelated serious youth violence incidents. The CSCP published a nationally recognised review into the differences/similarities of the lives of [60 vulnerable adolescents](#) in February 2019. This new review of 7 young people may attract similar interest.
- 3.3 The CSCP completed 5 Safeguarding Practice Reviews. Page 8 of the Annual Report provides more details. Although the CSCP is limited in what they can publish due to matters awaiting conclusion at either Coroner or Criminal Court, the learning from these cases as well as national cases of interest has been shared widely in briefings, on-line and in-person events. The case studies have provided meaningful substance for practitioners to anchor their learning in, however perennial themes persist such as:
- poor information sharing across agencies
 - lack of professional curiosity by practitioners
 - the importance of identifying and engaging with fathers/male carers
- 3.4 Other themes include:
- extra-familial harm
 - the quality of safeguarding supervision for professionals
- 3.5 The CSCP Learning & Improvement Group align the findings from both Rapid Reviews and Safeguarding Practice Reviews with the learning events commissioned for the following year.
- 3.6 The CSCP reviews a very small number of cases, given the number of children in the borough or indeed the number already subject to Early Help or Child Protection. Most children are safe and well. One child death or serious injury is always one too many, however it should be viewed in the context that whilst

similar themes persist, these are not catastrophic failings in themselves, but areas where practice could have been more robust. Efforts to permanently change practice are impacted by frequent changes in the workforce and systems and processes which do not necessarily support professionals to do their best work efficiently, especially in a climate of increased pressure on resources. None of these challenges were the cause of the deaths or injuries to these children, which sits firmly with the people who perpetrated the harm. Narrowing the gap where safeguarding risks persist for children is a constant priority.

- 3.7 A number of statistics relevant to the work are shown on pages 6-7 of the annual report. The CSCP uses data to understand the safeguarding landscape for children in Croydon and to provide scrutiny or challenge of partner agencies. Clarity has been provided by informed commentary and robust examination by all partner agencies. For example, Education has been able to show its grasp and impact to keep children in school (Croydon's current exclusions are very low) and the number and quality of referrals is something being progressed alongside the MASH Operational Group.
- 3.8 The CSCP aligns its work with other multi-agency workstreams, ensuring CSCP membership includes relevant representation from other workstreams and that CSCP members are included in other workstreams to enable cross cutting themes to be referenced in all areas. For example, there are CSCP members in the Community Safety Partnership (CSP), The SEND Board, The Domestic Abuse & Sexual Violence Board (DASV) and The Early Help Partnership Board.
- 3.9 Collaboration with the SCP has enabled greater sharing of pertinent data and engagement with the Community Safety Strategy. This approach has been developed for 2022-23 with similar engagement with Public Health workstreams such as the Preventing Suicide & Self Harm Strategy and influencing Joint Needs Assessments (LGBGTQ+ and another JSNA for Vulnerable Adolescents) by sharing the learning from our work and where possible, building in opportunities to raise the community awareness of safeguarding themes to help equip the community to help itself.

4 OUTCOMES

- 4.1 Outcomes are referenced in almost every area of the report. Some key outcomes are:
- Quality Briefings & Learning Events based on SPRs and National Learning which are well received by the wider partnership who value the content, opportunity to reflect and supportive learning environment in which they are delivered
 - Influenced & co-produced the new Suicide & Self-harm Strategy, Early Help Directory & Early Help Strategy
 - The culture of partnership working around Mental Health has improved, increasing confidence.
 - Raised awareness of the need for an 11-25 vulnerability panel which is now in place.

- Pressed the continuing need for an Early Intervention Approach which is influencing the new Multi-Agency Safeguarding Hub (MASH) developments.
- Using quality presentations from across the partnership/services enabled partners to review their strategic responses to vulnerable young people e.g., the Youth Offending Service Disproportionality Dashboard.
- Sought evidence of voice of the child influencing service design e.g., chill zone in the Paediatric Hub.
- Support for Schools following the “Everyone’s Invited” Campaign.
- Police/Croydon College co-delivered student awareness sessions which improved student understanding of healthy relationships & consent.
- Data examination around ethnicity and disproportionality improved data capture and service design.
- We have secured new training based on learning themes:
 - Expanding Cultural Competencies for Safeguarding Professionals working with LGBGTQ+ Young People
 - Challenging Disproportionality – Assessing the Extra-Familial Risk for Black Male Children & their Families
 - Trauma Informed Approach - e-learning module and additional face to face/MS Teams courses
- The value of the opportunity for ad-hoc conversations with CSCP Members who are seen as “experts in safeguarding” and their ability to influence workstreams outside of the CSCP core business cannot be under-estimated.

5 FORWARD PLANNING

- 5.1 2021 was the worst year on record for deaths of teenagers in London due to serious youth violence. 30 teenagers lost their lives, five were killed in Croydon as a result of separate incidents; the highest number in any London borough. Other young people were associated with the incidents. As detailed in para 3.2, the CSCP has commenced a Thematic Local Child Safeguarding Practice Review (LCSPR) which focuses on 7 of the young people associated with the incidents. It will examine the quality and outcomes of the services offered to support these young people and test the theory, whether young people exposed to extra-familial harm are as much at risk of being a victim of serious youth violence as they are of being an alleged perpetrator of the same.
- 5.2 The Thematic LCSPR is expected to be concluded by the end of December 2022, however criminal court processes will restrict publication in full. This report will help the broader partnership understand the barriers to young people engaging in multi-agency activities intended to support and safeguard them as well as hear directly from young people and their parents who have received such services. There has been excellent engagement with the professionals directly involved with these families and early findings show some strong and often innovative multi-agency work with families to reduce risk.
- 5.3 The CSCP has commissioned its own independent review of the effectiveness of the partnership. The findings, along with the appointment of a new

Independent Scrutineer from November 2022 will shape the development of a robust CSCP business plan for 2023.

5.4 The Independent Review author reports:

- The CSCP supports the delivery of safe multi-disciplinary practice in the Borough. Benefiting significantly from highly experienced and competent leaders, the partnership demonstrates a capability to identify and focus on those issues relevant to the needs of local children and young people.
- Safeguarding Practice Reviews are currently the best evidence of the voice of the child. Those children's experiences come through in the reports, a testament to the quality of the Independent Authors as well as to the honest, open and committed engagement of the professionals and practitioners involved in the reviews.
- The annual report includes quotes and information from children surveyed by other linked areas such as EMPIRE and the Safer Croydon Partnership however this is an area that needs development. Over 2022-23 the Partnership will focus on activities to ensure children and young people's voices shape services delivered by the partnership agencies.
- The skill and commitment of the CSCP Executive, Independent Scrutineer and other longstanding senior partnership members, combined with the with the passion and tenacity of the business support team ensures the demanding nature of the CSCP business functions efficiently. However, should there be significant changes to those personnel this may impact on the CSCP's effectiveness.

5.5 Plans are being developed to strengthen the infrastructure that supports the working and influence of the CSCP, including:

- a refresh of the Terms of Reference
- the development of a Partnership Quality Assurance Framework
- a more robust approach to business planning

5.6 Aligned with the appointment of a new Independent Scrutineer these developments aim to position the CSCP to further improve its effectiveness in assuring that children and young people across the borough are safeguarded.

6 CONSULTATION

6.1 The three statutory partners (Local Authority, Health and Police) along with other CSCP member organisations including the voluntary sector have contributed to the annual report. The Independent Scrutineer has also provided her own reflections.

7 PRE-DECISION SCRUTINY

- 7.1 The report was presented to Children & Young Peoples Scrutiny Sub Committee on the 27th of September and feedback from the committee's review is included in this report.

8 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 8.1 There are no direct financial implications arising from this report. This is a retrospective report. The Croydon Safeguarding Children Partnership (CSCP) operates within a budget to which partner agencies contribute (budget details on page 6)

Approved by:

9 LEGAL CONSIDERATIONS

- 9.1 Section 16E of the Children Act 2004 requires the safeguarding partners for a local authority area in England to work together to exercise their functions in relation to safeguarding and promoting the welfare of children in their area. The safeguarding partners include the local authority.
- 9.2 Section 16G of the Children Act 2004 requires the safeguarding partners to prepare and publish a report at least every 12 months on what the safeguarding partners and relevant agencies have done because of the children's safeguarding arrangements, and how effective the arrangements have been in practice.
- 9.3 There is also statutory guidance on the working of local safeguarding arrangements in Working Together to Safeguard Children (2018).
- 9.4 The matters set out in this report comply with the above legislation and guidance.

Approved by: Doutimi Aseh, Head of Social Care and Education Law on behalf of Stephen Lawrence-Orumwense, Director of Legal Services & Monitoring Officer

10 HUMAN RESOURCES IMPACT

- 10.1 There are no direct Human Resources implications arising from this report for Croydon Council employees.

11 EQUALITIES IMPACT

11.1 The Council has a statutory duty, when exercising its functions, to comply with the provisions set out in the Sec 149 Equality Act 2010. The Council must, in the performance of its functions, therefore, have due regard to:

(a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act.

(b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.

(c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

11.2 The role of the CSCP is to safeguard all children and promote their welfare. The CSCP has played a leading role in challenging inequalities and in safeguarding those children who have/are at risk related to their ethnicity and gender. For example, the work to provide training to challenge disproportionality when assessing Black boys at risk from extra-familial harm and the intention to provide LGBTQ+ training for professionals working with young people who are self-harming or at risk of suicide.

Approved by Denise McCausland, Equalities Programme Manager

12 ENVIRONMENT AND CLIMATE CHANGE IMPACT

12.1 None

13 CRIME AND DISORDER REDUCTION IMPACT

13.1 None

14 REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

14.1 That the Council notes the work and effectiveness of the CSCP in its activity to safeguard and promote the welfare of children in Croydon and to note the report provides robust evidence of the impact of the CSCPs activity to improve outcomes for children & families.

15 OPTIONS CONSIDERED AND REJECTED

15.1 None

16 DATA PROTECTION IMPLICATIONS

16.1 WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?

NO

16.2 HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN COMPLETED?

NOT APPLICABLE

The Director of Early Help and Children's Social Care comments: *"There is no individual or confidential information contained within the report. Information has been provided in summary form from each of the relevant agencies.*

There is in place across all London Boroughs a robust Multi-Agency Data Sharing Agreement with all partners."

CONTACT OFFICER: Donna Kingsley - CSCP Manager

APPENDICES TO THIS REPORT –CSCP Annual Report 2021/22



CSCP
CROYDON SAFEGUARDING
CHILDREN PARTNERSHIP

CROYDON SAFEGUARDING CHILDREN PARTNERSHIP

ANNUAL REPORT 2021-22



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FORWARD FROM CSCP EXECUTIVE



The CSCP is tasked with ensuring partnership working delivers an effective safeguarding system which protects children in Croydon from harm. We aim to raise safeguarding standards across all agencies working with children. We do this by supporting professionals to have access to quality learning resources, focussing on specific themes like vulnerable adolescents and mental health outcomes, regularly reviewing and being up to date with both local and national safeguarding advice and using data to understand the landscape and challenge performance.

Performance data is important as an indicator of safeguarding activity, but the quality of our work is not necessarily evident by shifts in data. For example, our work to raise awareness of neglect is important to ensure early identification and is likely to lead to a rise in numbers rather than a reduction. Training and development are key to developing our staff and improving how they work together. Our multi-agency forums are a vibrant and respected space for professionals to collaborate, be challenged and have access to excellent presentations from a wide range of partners supporting better outcomes for children. This intangible benefit is hard to quantify but is always cited by professionals attending CSCP meetings and events as highly valuable.

The CSCP Executive leads by example, meeting monthly to ensure a cohesive understanding of the challenges facing the 3 key agencies charged with safeguarding children in Croydon and a joint approach to agreeing the plans and work required to discharge its duty.

This report provides evidence of that work. In July 2022 we also commissioned an independent report into the effectiveness of the CSCP. The preliminary findings echo what is in this annual report and will help to shape the work for 2023.

Eleanor Brazil
Independent
Scutineer

Elaine Clancy
Joint Chief Nurse Croydon
CCG/CHS (CSCP Executive)

Fiona Martin
Detective
Superintendent
(CSCP Executive)

Debbie Jones
LBC Corporate
Director, Children
Families & Education
(CSCP Executive)



MESSAGE FROM THE INDEPENDENT SCRUTINEER



The role of the Independent Scrutineer is to provide oversight and challenge, and to support the partnership in its work. I do not see myself as independent of Croydon, but independent from any operational or management role in Croydon. Like others involved in the partnership I am passionate about the work we do to improve outcomes for the most vulnerable children and young people in Croydon. This report is a testament to that work.

During the year I have had the opportunity to work with dedicated, committed, and knowledgeable practitioners and managers from across social care, early help, health, police, schools, education and the voluntary sector. It is important to reflect on what has worked well. However, we also learn from the sad and tragic events where children have suffered from harm. This report includes details on both aspects of our work.

As I said last year, Croydon is a vibrant, diverse and complex borough. It is an exciting but challenging environment in which to work. The partnership is committed and strong, and the report reflects that.

Eleanor Brazil
Independent Scrutineer

A handwritten signature in black ink that reads "Eleanor Brazil".



INTRODUCTION

This annual report covers the period April 2021- March 2022. It seeks to address the question of **how effective** this partnership is, in accordance with the requirements of **Working Together 2018**, specifically:

PART 1: THE WHAT? →

What have we done as a result of the arrangements, including following child safeguarding practice reviews, and how effective these arrangements have been in practice?

PART 2: THE SO WHAT? →

Evidence of the impact of the work of the safeguarding partners and relevant agencies, including training, on outcomes for children and families from early help to children looked after and care leavers.

PART 3: THE WHY NOT? →

An analysis of any areas where there has been little or no evidence of progress on agreed priorities.

PART 4: THE WHAT NEXT? →

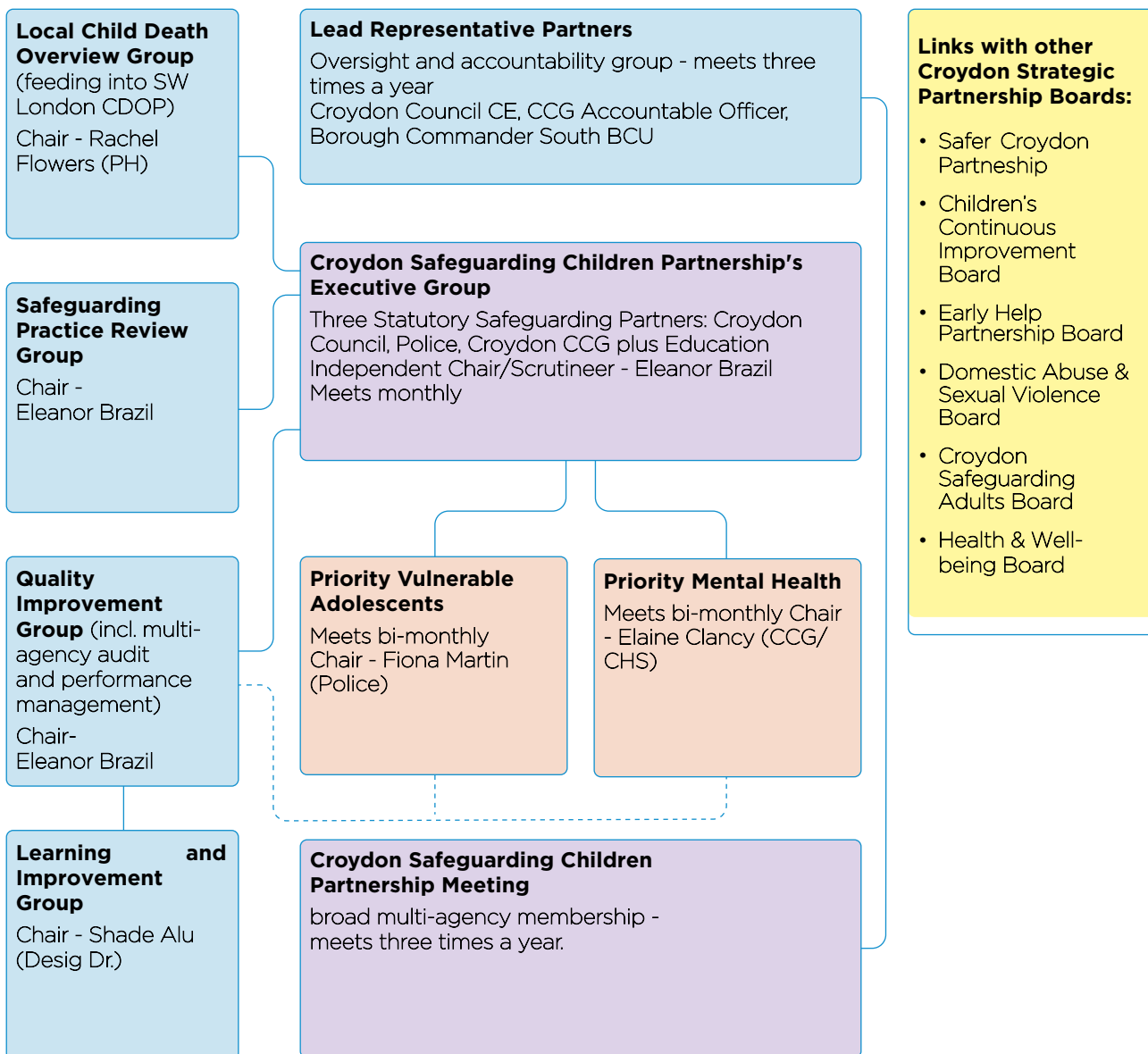
A record of decisions and actions taken by the partners in the reporting period (or planned to be taken) to implement the recommendations of any local and national child safeguarding practice reviews, including any resulting improvements.

PART 5: WHAT CHILDREN & FAMILIES SAY →

Ways in which the partners have sought and utilised feedback from children and families to inform their work and influence service provision



CSCP ARRANGEMENTS 2021-22



CSCP BUDGET AND EXPENDITURE 2021/22



INCOME

SOUTH LONDON & MAUDSLEY NHS UNIT	£13,540
MET POLICE	£5,000
CROYDON CCG	£33,850
CROYDON HEALTH SERVICE	£33,850
NATIONAL PROBATION SERVICE	£2,000
TOTAL INCOME	£88,240
LB CROYDON	£215,212
TOTAL INCOME	

£303,452

EXPENDITURE

STAFF & RELATED COSTS	£242,457
SERIOUS CASE REVIEWS	£41,267
CSCP TRAINING PROVIDED	£8,471
SERVICES RECHARGE	£9,025
MISCELLANEOUS	£825
MAILROOM, STATIONERY, SUPPLIES	£407
WEBSITE	£1,000
TOTAL EXPENDITURE	

£303,452

SAFEGUARDING STATISTICS 2021-22



The CSCP regularly reviews statistics and performance data via a specific dataset group which informs the data taken to the Quality Improvement Group and Executive. Some data is monitored throughout the year, other is periodical or themed. For example, we now have data about the number of young people attending A&E experiencing a deterioration in mental health in addition to those attending due to self-harm. This has given us a greater understanding of the increase in poor mental health generally and has influenced the work of the Mental Health Priority Group.

As of 31st March 2022, there were:

232

family cases open to Early Help (477 children)

2021: 337 (703 children)

603

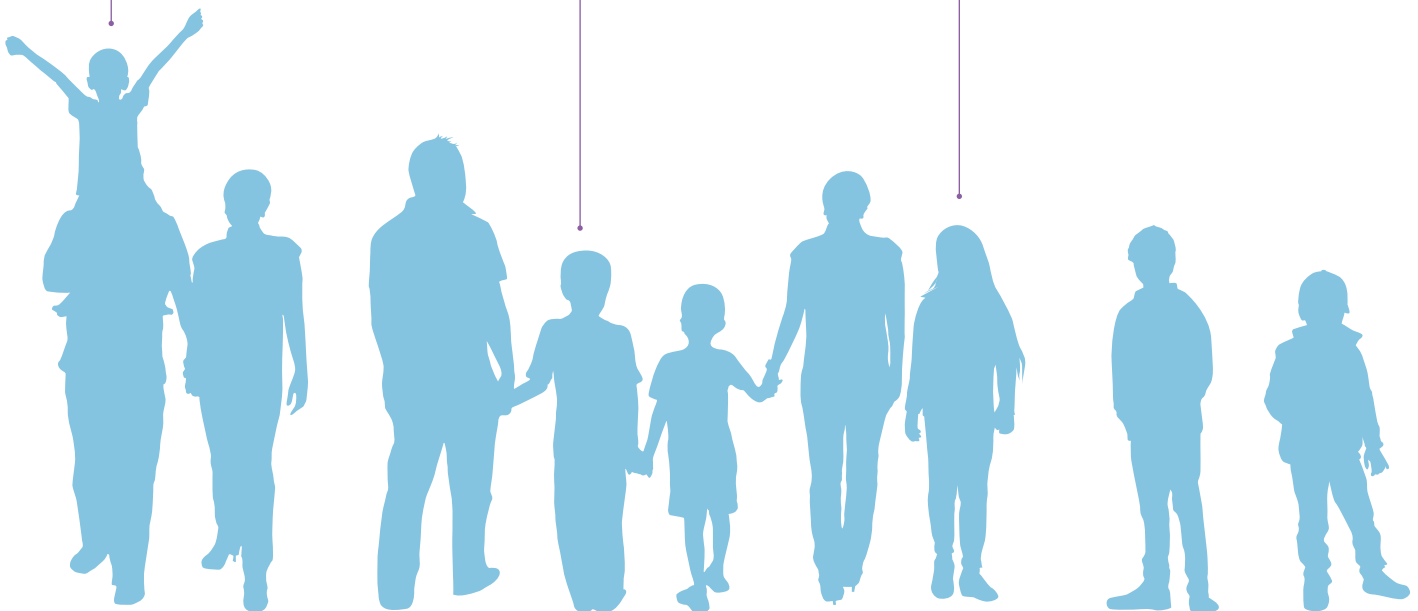
children on a Children In Need Plans (CIN)

2021: 657

445

local children looked after (CLA)

2021: 481



3451

open referrals – (excluding cases allocated to children with disability team (s))

2021: 3786

440

children on a Child Protection Plan (CP)

2021: 280

114

unaccompanied asylum seeking children (UASC)

2021: 210

The following statistics help describe the landscape for children in Croydon during the year 2021-22:



Number of children in Croydon aged under 18:
95,309
almost 25% of the Croydon Population

Rate of open cases, per 10,000 of the under 18 population was
362.1
This is lower than 2020-21 (398.3)
For comparison in 2020-21 London was: 338.9 and our statistical neighbour was 352.8

Number of contacts to CSC where reason was referral was
9455
(18,947 SPOC forms)

There were
2067
missing episodes recorded in the year across 89 children.



A very small percentage are children where there are very serious child protection concerns.

The rate of children who were subject to a Child Protection Plan per 10,000 of the under 18 population was
46.2
This is significantly higher than 2020/21 where it was 28.6.
(London 2020-21 was 36.3 and our statistical neighbour was 38.1)

Number of referrals into Early Help 2021-22
1980

1384
of those episodes related to Children who were looked after.

18
Children were reviewed at The Child Death Overview Panel (CDOP)*.
The CDCP Annual Report can be accessed here

*Note these do not necessarily reflect deaths in the same year

PART 1: THE WHAT?



What have we done as a result of the arrangements, (including following Child Safeguarding Practice Reviews) - and how effective have these arrangements been in practice?

Despite the ongoing significant challenges due to Covid-19 we continued to see good multi-agency attendance at all meetings. We have worked hard to ensure available technology has assisted our work. Almost all meetings occurred on MS Teams. We also started to make use of break out rooms, survey software and other technical innovations to enable us to have more engagement with our partner agencies. This has continued into 2022-23 with the use of Menti-Meter which enables live feedback to be captured during learning events and meetings.

We have continued with our published arrangements where the 3 Safeguarding Partners form the CSCP Executive Group with the addition of the Director for Education and the Independent Scrutineer.

SAFEGUARDING PRACTICE REVIEWS (SPRS)

During the year we completed 7 rapid reviews (where a child is seriously harmed or died; and neglect or abuse was known or suspected).

3 of these were taken forward to a thematic safeguarding practice review, looking at young people alleged to have been involved in serious youth violence where another child has been killed. This is likely to be concluded in November 2022.

We completed 5 Safeguarding Practice Review Reports which were started during the previous year.

Ben was published in March 2022 following the conclusion of the criminal case. **Read the report here** [↗](#)

Carl & Max was also published in March 2022. **Read the report here** [↗](#)

We agreed not to publish one case to protect the anonymity and wellbeing of surviving subjects and family members.

We are unable to publish 2 more pending the outcome of coroner or criminal proceedings.



This is a significant work rate for the year (in 2020-21 we had 3 Rapid Reviews and published/completed 1 case). This is testament to the expertise and commitment of the Safeguarding Practice Review Group members who are largely longstanding members who are frequently commended for their compassion and commitment by Independent Reviewers.

Despite the restrictions on publishing (and to mitigate the amount of time it takes to conclude an SPR) alongside the process we have been conducting briefings and learning events to share the learning and gather feedback/evidence of good practice from professionals working with similar cases.

We have also used National Learning, such as the **“Myth of Invisible Men”** report on children under one injured by their male carers; as well as asked partner agencies to provide briefing materials specific to their experience to enhance the materials on offer to support professionals. For example, the Police produced a briefing on **Clare’s Law** which has been widely circulated and has led to increased confidence for professionals to either make an application themselves, or to empower potential victims of domestic abuse to make one.

The themes identified in our SPRs have influenced the priorities of partner agencies.

Key Themes for 2021/22:

- Importance of Fathers/Male Carers
- Professional Curiosity
- Information Sharing
- Safeguarding Supervision
- Extra-Familial Harm

For example:

- Children’s Social Care has “work with fathers” and “professional curiosity” as practice improvement areas.
- Health colleagues at Croydon University Hospital are promoting the use of “was not brought” instead of “did not attend” to keep the focus on it being the parent’s responsibility to ensure their child comes to medical appointments – and not bringing them is potentially a sign of neglect.
- Early Help Family Solutions Service share the briefings amongst their teams and use them as the basis for reflective discussions around practice, challenges and approaches. They have promoted the use of the Child Wellbeing Tool via the locality meetings (multi-agency).
- Education Services regularly use our material and have also contributed to the content on the website. They have promoted the use of the Child Wellbeing Tool and the use of the Graded Care Profile 2 Tool (GCP2), leading to the first education based professionals to be licenced to use the GCP2 Tool.



Not all cases progress to SPRs. Rapid review learning has also influenced the work of the Partnership, particularly around suicide. These cases are influencing the Suicide & Self Harm Strategy refresh as well as providing case study examples for a learning event which took place in September 2022. This should lead to a better partnership/professional understanding of the triggers for suicide or self-harm and therefore improve the ability to reduce the incidence.

THE MENTAL HEALTH PRIORITY GROUP

The CSCP Executive identified this priority in recognition of the increasing pressures and poor outcomes for children and young people who had poor mental health. The first meeting took place in June 2021. The Group was chaired by Elaine Clancy, (joint Chief Nurse Croydon CCG/CHS) and has always been a well-attended, vibrant multi-agency meeting.

Its aims were to:

- Identify opportunities and resources to generate change activity and outcomes which positively impact front line practice, making a difference to mental health outcomes for all children under 18 (including those with a disability 0-24).
- Identify risks and obstacles and work collaboratively to mitigate or address these.
- Contribute to the safeguarding children partnership practice learning and improvement program.

This work could not cover every aspect of mental health, the 3 agreed areas are shown overleaf.



1. COMMISSIONING & ACCOUNTABILITY

Young people's mental health needs are met because there are systems and procedures in place to hold commissioners and providers of relevant services to account.

OUTCOMES:

- a. We have assurance from commissioners that mental health is very much on the current agenda. The Commissioning Team will be developing the THRIVE model which is also linked to the ICS (Integrated Care Systems) which has brought together and replaced CCGs and provider organisations (Jul 2022).
- b. Suggested questions to be considered at every audit to evidence outcomes for mental health has been developed and circulated for partnership use.
- c. Influenced and co-produced the Local Self-Harm & Suicide Prevention Strategy & Action Plan

2. HOLDING THE RISK

Professionals know where to access resources to support young people and their families.

There is a clear pathway for professionals and families to access and escalate concerns

OUTCOMES:

- a. Co-production of the Early Help Directory
- b. Joint Working Protocol refresh
- c. Presentations have helped professionals understand where and how services are accessed
- d. Influenced the need for the new Risk & Vulnerabilities panel which will consider 11-25s where professionals are concerned their needs are not being met.
- e. Staff wellbeing/service delivery pressures. Raised to Exec (Aug 2022)

3. LEARNING & DEVELOPMENT

Professionals have access to quality training to recognise and respond to mental health concerns when working with young people.

OUTCOMES:

- a. Trauma Awareness online course is live on CSCP website
- b. Co-production of the trauma awareness training offer
- c. Developed and commissioned a new training: Expanding Cultural Competences for professionals working with LGBGTQ+ young people where self-harm/suicide is a risk
- d. Improved take up/visibility of other training on offer across the partnership


VULNERABLE ADOLESCENT PRIORITY GROUP

The CSCP Vulnerable Adolescent Priority Group (VAPG) commenced in April 2019 and has met bi-monthly since. In 2021-22 it has been chaired by Detective Superintendent Fiona Martin.

The TORs describe the group aims as:

- To provide oversight of the recommendations of the Vulnerable Adolescent Review
- To identify and report on the prevalence of vulnerable adolescents in Croydon
- To contribute to the Local Strategic Partnership Youth Plan
- To drive wider partnership understanding of vulnerability in adolescents and how it translates into need for service
- To provide strategic advice and oversight in the effective delivery of services for vulnerable adolescents
- To promote and drive wider understanding of community-based resources available to Croydon children.

As of July 2022, these aims were achieved, some were embedded better than others. However, this group has had significant impact on increasing professionals' knowledge and understanding of the specific risks to vulnerable adolescents.

There have been several presentations and learning events that have raised awareness of this cohort, which has led to a change in how agencies deliver services to protect them. For example using the National Panel report **[It Was Hard to Escape: Safeguarding children at risk from criminal exploitation](#)** 

Although the timeframe for this report is April 2021 – March 2022, we know that Jan-Dec 2021 was the worst year on record for teenage murders in London. There were 30 in total, and five occurred in Croydon - more than any other borough in the capital. The thematic review is reflecting on both the victims who died and the other young people associated with the incidents leading to their unconnected deaths.



The VAPG carried out an insightful piece of work to examine the questions raised in the report which evidenced Croydon knows its cohort and the challenges facing both young people and the workforce trying to support them.

This work continued by reflecting on critical reachable moments - this report was used in multiple briefings across the partnership as well as within the Mental Health Priority Group.

Members identified the achievements of the VAPG in the last year as:

- Worked hard to identify, discuss & consider responses to emerging need of vulnerable CYP
- Extra-Familial Harm – raised awareness, address & respond to vulnerabilities (via Missing Protocol/RHIs etc)
- Helped partners review strategic responses/services
- Good partnership understanding of this cohort
- First steps addressing disproportionality
- Data Accelerator bid – useful although not successful
- Highlighted the need for early intervention

In relation to the question: What are you doing differently (in your organisation) as a result of the VAR60 or the work you have heard about in the VAPG? Responses included:

- Collaboration – joint work/planning around TAS
- Early Help Offer – interface with Youth Engagement/Young Croydon
- Supported early help keyworkers to feel confident to deliver
- Will inform Family Hubs work
- All Staff Trauma Trained/Culture Competent/Extra Familial Harm (YOS)
- Integrated Offender Management Panel (co-ordinated with Police)
- Disproportionality dashboard (YOS) – shared as best practice. YOS embed into their work culture
- Emphasis on contextual safeguarding training
- Our action plans are more robust
- Achieving Health Equity Core 20 Plus (SWL CCG)
- Has informed the PCREF (Patient & Carer Race Equality Framework)
- Service design (chill zone in Paediatric Hub)



SAFER CROYDON PARTNERSHIP

The CSCP has supported work to inform the new Community Safety Strategy and the CSCP benefits from regular membership and engagement from the Violence Reduction Network including ongoing performance data to evidence the impact of partnership work to reduce crime.

The CSCP is advocating to ensure sexual exploitation is more extensively referenced in the new VAWG Strategy. The CSCP regularly attends the Domestic Abuse & Sexual Violence (DASV) Board where this work is held.

Croydon adopted a public health approach to reducing violence in June 2019 and has since started work to create a violence reduction network to implement it. The following themes and principles were developed:

THEME ONE USING DATA TO DRIVE OUR APPROACH

Building a strong evidence base and a common screening tool that can be used across organisations to predict who, where and why individuals and families are more likely to be involved in violent or aggressive behaviours and identifying the interventions that will have the maximum impact.

THEME TWO PREVENTING VIOLENCE BEFORE IT OCCURS

Looks at the periods and key influences in a person's life journey, from pre-birth to adulthood which can increase the risks of becoming involved in violent behaviour and the opportunities when interventions can be most effective.

THEME THREE COMMUNITY BASED SUPPORT

Recognises the strength of the community and voluntary sector in Croydon and places them at the heart of Croydon's public health approach to violence reduction. It promotes combining skills and enabling voluntary and community organisations to support people and families collaboratively.

THEME FOUR TARGETED INTERVENTIONS

It uses the principles of a family centred approach aimed at addressing violence, by looking at the wider family and connected family dynamics, based on clear safeguarding, case management approaches.

THEME FIVE INTENSIVE INTERVENTIONS AND ENFORCEMENT

Sets out an intention to offer personalised support for those who are motivated to step away from a life of violence, whilst using the full range of enforcement across all agencies, against those whose behaviour places themselves, those around them, or the wider community at risk of harm.



The CSCP has collaborated with the Safer Croydon Partnership (SCP) to influence the Community Safety Strategy. Priority 2 relates to exploitation and specifically references how the CSCP will work alongside the SCP particularly to raise awareness of risk and supporting the wider partnership to recognise and respond appropriately. The CSCP also provides training. The newly commissioned “Challenging Disproportionality” – Risk assessments for Black boys and their families affected by extra familial harm is an example. Safeguarding partners sit on the SCP and share relevant information with the CSCP.

The CSCP recognises the Mayors commitment to make Croydon safer for young people – the work with the SCP will support this aim. For 2022-23 the CSCP are also providing awareness sessions for Councillors to appraise them of the current work of the CSCP, the key themes from Safeguarding Practice Reviews and to share links to the Safeguarding Awareness Training, Trauma Informed Awareness (and others) which would be beneficial for anyone working in the community.

The local authority led (but partnership encompassing) work to move to Family Hubs in Croydon is actively influenced and supported by the CSCP.

OFSTED FOCUSED VISIT- THE FRONT DOOR (JULY 2021)

A focused visit took place in July 2021 where Ofsted Inspectors found that despite the challenges of Covid-19, the significant changes to the permanent senior leadership and the considerable and ongoing financial challenges – staff at the “front door” were making safe and appropriate decisions on most referrals.

“Contacts and referrals for children in need or at risk of harm are managed effectively in the single point of contact (SPOC). Social workers routinely seek information from partner agencies and take account of family history when making decisions about levels of risk. SPOC managers are taking appropriate action to improve the consistency and quality of multi-agency information-sharing”.

The CSCP has been routinely engaged with MASH meetings to ensure information sharing – especially where fathers are concerned is being given due consideration and this continues to be a feature of CSCP Briefings from lessons learned from Safeguarding Practice reviews.

LOCAL AREA SEND - OCTOBER 2021

Ofsted and the CQC conducted a joint inspection to judge the effectiveness of Croydon in implementing SEND reforms as set out in the C&F Act 2014.

The findings were largely very positive including:

“Current leaders understand the context of the area well and, especially since 2018, have used their knowledge to develop a coherent and ambitious SEND strategy. This has improved the pace of improvement and means that leaders are tackling the right things in the right order. Leaders in Croydon evaluate the effectiveness of their response to the 2014 reforms accurately. They know what is serving children and young people with SEND well and where there is still more to do.”

Similar to findings from the CSCP, Inspectors found that developmental checks on two-year-olds are not happening often enough. This is a historical underfunding issue, alongside challenges with recruitment and retention of staff. The CSCP continue to track and challenge all the mandated checks for babies and infants and have ensured this risk is being tackled by health visiting services and the agencies which commission them.



COMMUNITY BASED SUPPORT

We continued to see our community-based organisations providing significant support for families, especially during Covid. The BME Forum worked collaboratively with several schools and the council, backed by the Young Londoner's Fund, to offer targeted support at the transitional phases between primary and secondary school and school/college.

This saw 81 young people take up places, 121 young people complete between 7-14 mentoring sessions and a further 38 complete diversionary activities. This work had a direct impact to safeguard some of the children most at risk of harm and at risk of exclusion from school.

Croydon Voluntary Action (CVA) delivered a number of networking opportunities for voluntary sector organisations working with children and young people. They capitalised on the interest expressed by groups working with autistic children, to bring them together with representatives from other partner organisations to share expertise. These events have led to better engagement with various voluntary sector groups and other local initiatives such as The Young Londoner's Fund Network and a LGBTQ+ network meeting for young people and those who work with them.

INDEPENDENT SCRUTINEER CONVERSATIONS

Our Independent Scrutineer introduced conversations with front line practitioners sessions, as a means to gather feedback about the effectiveness of the partnership. The first one was with staff from Children's Social Care and Early Help and took place in March 2022 as part of the practice week themes on neglect. The second session was later in the year with a group of front-line health practitioners. Key points included:

- Most staff positive about working relationships with external partners
- Importance of good relationships with schools
- Covid had made working with families more challenging, but staff had kept face to face working throughout
- Reflective supervision is valued
- The information on the CSCP website and the training offered is really valued

REFLECTIONS FROM THE PARTNERSHIP

Fiona Martin

Detective Superintendent (CSCP Executive)

“The last year has been a challenge coming out of Covid, but lessons learned from 2020-21 have been embedded and improved liaison with partners and our service to children. Some of these have been in the way we work, and some have been about maintaining better practices.

One example of this is the “Every Child Every Time” (ECET) programme which continues in the custody suite at Croydon. This has been running since June 2020, to improve awareness of officers who are dealing with children in custody as a reminder that we need to understand their vulnerabilities as children and to encourage “the voice of the child”. Performance of this programme is monitored at the weekly ECET meetings. The meeting also reviews incidents where children have been placed in police protection ensuring that safeguarding and multi-agency working has been effective. This has improved our use of police protection and involved the children more in the process. We hope that we can welcome social care into this meeting in the near future to help us share concerns and identify learning.

The “one front door” team was set up in February 2021 in response to the increased demand for multi-agency meetings regarding contextual safeguarding issues that affect children who may be drawn into criminality, risk of exploitation, gangs, missing episodes or living with domestic violence within their home setting. Working with our partners we have now implemented a booking process that allows social care to directly book appointments with the relevant teams. The CAIT team, who have expertise in child safeguarding referrals, manage the booking process and continue to triage the requests from social care and then allocate to the best placed police team to take part in the strategy discussions. The implementation of the booking process is improving police attendance at these meetings. Additional strategy discussion training is being delivered to Police teams and supervisors across Croydon. A weekly escalation meeting is in place with social care and health to review any issues and to share learning.

The Child Criminal Exploitation and Child Sexual Exploitation team continues to hold regular operations with the British Transport Police and Safer Neighbourhood team, other agencies, and surrounding forces particularly around transport hubs. These multi-agency operations will continue regularly in the coming year. They engage closely with children, understanding the risks they face and helping them to escape from that pathway. As a result we have diverted a number of children from high risk activities and ensured their safety.

The Child Abuse Investigation Team continues to investigate familial offences against children. Despite dealing with the highest number of offences in London the team have focused on improving the outcomes for victims, whether that is





through taking offenders to court or working with our partners on child protection plans. Whilst they mainly investigate current offences, the team also work with non-recent cases bringing predatory sexual offenders to justice by obtaining significant custodial sentences. These include a case where a member of the public contacted police after seeing a newspaper article about a male being convicted for sexual offences. She had been a victim of his when she was a little girl. The team worked with the victim to gather evidence and present a case. Despite initially pleading not guilty, the evidence against him was so strong that he changed his plea and was sentenced to 10 years in prison.

It has chaired the Vulnerable Adolescent Priority Group for the past year. The meeting has been really effective in bringing colleagues together from across the statutory and voluntary sector. It has carried out significant activity to enrich, influence and inform partnership work around vulnerable adolescents. It knows the size and scope of the challenges in Croydon and can evidence traction against the original recommendations from the Vulnerable Adolescent Review carried out in 2019, however it is difficult to quantify this against outcomes for children.

Recognising the need to constantly learn, the police have an active role in Safeguarding Practice Reviews. We have all taken learning from the cases that have been reviewed and shared in joint learning events. We have also been pleased to welcome some Croydon social workers to a CAIT training day so we could exchange learning. It was a great success and started some great working relationships.”

Elaine Clancy
Joint Chief Nurse Croydon CCG/CHS (CSCP Executive)

While the health economy across Croydon has begun to emerge from the intensity and pressures of the pandemic, Covid19 continues to impact on all services and our communities. There has been a wealth of learning in terms of identifying ways of managing crisis situations and being creative and innovative in the delivery of care. We have also witnessed the resilience and kindness of the workforce who have gone above and beyond in their continuing support of clients and patients.

The last year has been a time of reflecting and gathering ourselves, responding to the frequently complex nature of this virus, including the affect it has had on the emotional, physical and mental health and well-being of our community, and on occasions staff and colleagues.

A number of initiatives were put in place as the crisis eased. In response to the increase in domestic abuse and sexual violence during the pandemic, CHS were able to secure charity funding for a short-term Domestic Abuse Support Worker to work alongside the safeguarding team. The aim was not only to provide an additional resource for the service and clients but to also support staff who themselves are victims of abuse and violence.

Elaine Clancy



We are all aware of the concerns relating to the mental health and emotional wellbeing of our children and young people and the impact of the last few years. As the Chair of the Mental Health Priority Group, I had the privilege of working with colleagues from the voluntary and statutory sectors all of whom are driven by their determination to support those in need and troubled by the life challenges and lived experiences. This group helped each other to understand the complexities young people face and the impact of issues such as neurodiversity, gender identity and adverse childhood experiences. We are all now better informed and, as a result of these discussions, have been provided with opportunities to access further training to improve our practice and deliver better care.

From a CHS perspective, the Emergency Department has seen a number of young people attending on a regular basis in a state of distress and need. It was clear that although health was frequently the point of contact in a crisis, no one agency could work in isolation when trying to provide a better and more efficiently co-ordinated response to each young person's needs. Over the last year, specialist services have come together to develop pathways of care and provision for young people. In addition, there has been recognition of the impact of the period of transition between being a young person and becoming a young adult. The many changes and, in some circumstances, the reduction in support and statutory frameworks surrounding them, cause significant distress and anxiety. There is still a long way to go to develop the right partnership support for this cohort of young people, but the discussions have started and will continue at both a Croydon and South West London level.

In health, we recognise the need to support our staff in order for them to safeguard our children and young people effectively. CHS reviewed its safeguarding provision in 2021, and as a result, restructured to increase the resource across the operational team. Safeguarding supervision processes have been reviewed and developed to increase the reach and quality. Our Primary Care Services have been supported in their safeguarding practice by our team of Designate Professionals and Named GP for Safeguarding.

The CCG Safeguarding Team worked with colleagues across SWL in planning for the implementation of the Integrated Care Board (ICB) and the Integrated Care System (ICS). Although this will not have implications for the statutory safeguarding duties at place level, it will provide an opportunity for collaborative working across the ICB, and we look forward to future developments as the ICS.

Debbie Jones

LBC Corporate Director, Children Families & Education (CSCP Executive)

The year 2021 - 22 brought major national developments across Children's Services through the Education White Paper, SEND Green Paper and the National Care Review, all drawing on the knowledge, experience and aspirations of children, young people, parents, carers and the key partners of Health, Police, Education and Children's Social Care.



The Education paper asks us to strive for every child to achieve their highest potential supporting attendance and inclusive provision which means all education provision continues to be safe supportive caring place for children and young people.

The SEND Green paper has enabled all partners to contribute proposals for cementing co-production into national standards for children with SEND whose safeguarding needs are augmented by additional and disability needs.

The Care Review makes recommendations for significant change in the delivery of child protection and child in need work, a clear emphasis on early help to provide the best opportunities for children's lives improving as soon as challenges are recognised and prompts the sector to improve the outcomes for children who need Local Authority care, again a partnership endeavour. We await the DfE Implementation plan however the development of practice in Croydon is ahead of the game with our transformation in the Front Door services and relentless focus on supporting practitioners across social care to have the time and tools to respond to children's needs.

In our Education Division we have organised our Access to Education Services to focus on attendance, inclusion and behaviour support developing our 'Team around the School' approach working collaboratively with Schools to address safeguarding issues. Our education lead based in the Multi-Agency Safeguarding Hub provides a key link with Designated Safeguarding Leads (DSL) and our specific social care projects for supervision of DSLs and Social Work in Schools teams.

All agencies are in recovery from the pandemic arrangements and the Council has a hybrid working policy in place to enable return to office working as teamwork will never be the same through virtual communication as it is in person.

During this year of review a major focus for Children's Social Care was to adapt resources to deliver within significant budget reduction and the Ofsted Focused Visit in June 2021 confirmed the commitment of Croydon staff. Enhancing partnership working at the Front Door has continued alongside Early Help transformation which will be aided by our success in obtaining DfE Funding for our Family Hub project in Croydon.

Recruitment and retention are key challenges in social care and Special Educational Need/Disability (SEND) specialisms, so I am pleased that we have recently welcomed qualified social workers from South Africa and Zimbabwe, our ASYE Programme continues to attract high applicants and our Social Care Academy offers a wide range of training through in house resources. Croydon is an excellent place to train and remain in social care practice, it is challenging of course, given the deprivation in the community and the rising cost of living all presenting pressures on family life.

Safeguarding is the business of us all, our responsibilities are to act to prevent, reduce and respond to children in need and in need of protection. We do this best when we listening to children, families, partners, informing continuous development through participation and co-production. It is an honour to chair the CSCP Executive Group, working alongside compassionate experienced strategic leaders, all focused on Croydon's children leading safe fulfilled lives.

CSC - 'children' QA

In response to audit findings, we are providing workshops to support:

- Chronologies/Genograms
- Direct Work
- Contextual Safeguarding

MENT4

We worked with Education and PRU colleagues to design a simple language brochure for parents to help them understand why their children might be at risk from exclusion

EDUCATION

We collated data and provided schools with support/training following unconnected child deaths in Dec 2021

BME FORUM

Secured a Tesco grant to deliver culture relevant food for 40 families

EARLY HELP

We prioritised ensuring Managers worked with practitioners & families to amplify the "child's voice"

MASH AUDITS

Audits to test the quality of referrals has led to training for referrers and process change for MASH

EDUCATION

We provided support to schools in response to the Everyone's Invited Campaign including a handbook, tools & a review

BME FORUM

We facilitated over 20 zoom meetings to provide families with info to help them help themselves. (Covid)

EDUCATION

In response to Hackney child Q (Adultification) we developed a flowchart for schools

CHILDREN'S SOCIAL CARE

We introduced a manager coaching programme - to improve managers' supervision skills and oversight of work with children, young people and families

PART 2: THE SO WHAT?



Evidence of the impact of the work of the safeguarding partners and relevant agencies, including training, on outcomes for children and families from early help to looked-after children and care leavers

IMPACT OF OUR BRIEFING MATERIALS

Much of our work is to provide the conduit for safeguarding professionals to access the relevant briefing materials around safeguarding learning in Croydon. The safeguarding leads then take the learning and resources back to their own agencies and share in reflective sessions or update policy as required.

Examples include:

- CAMHS holds regular “Time to Talk Sessions” and as a result of our recommendation, are planning to introduce specific safeguarding supervision for 2022/23. We have also refreshed our Safeguarding Supervision Guidance for multi-agency professionals to support this.
- Croydon College used the Sexual Violence Resources to deliver all staff training in January 2022 and have implemented a whole college approach to sexual violence & abuse.
- Croydon College/Police worked together to deliver student awareness sessions on healthy relationships & consent.
- Junior doctors had 2 sessions delivered to them to promote the need for appropriate multi-agency discussion around head injuries for non-mobile children and unexplained injuries in children in general.
- During Covid-19 we promoted a “working in peoples homes” resource as part of a campaign to support trades working in people’s homes during covid. This was widely published – including sending to all builder’s merchants in the borough.



We hold regular briefing sessions for any multi-agency professional working in Croydon. These sessions are usually themed and have good multi-agency representation.

IMPACT FROM DATA EXAMINATION

We hold a quarterly meeting to review multi-agency data ahead of the Quality Improvement Group (QIG). We have continued to press the need for more intelligent data, especially around ethnicity. A survey conducted to test the impact of our drive for correct data capture revealed that 56% of agencies believed they were *confident in most cases* that their ethnicity data accurately reflects the ethnicity of persons using their service, and 33% believing that it *mostly reflected it, but could do better*. This is an improvement on last year when most agencies were unable to comment as the quality of data was too poor in this area.

When asked what improvements had been made as a result of the CSCP drive, respondents said:

Our quarterly report now has a section on ethnicity. We've had discussions with staff about disproportionality and how it impacts on work & what can we do differently. Staff team are researching information on contextual safeguarding and ethnicity

We now split out the quarterly data so that it is more meaningful in terms of ways to change to impact on young people. It led to us doing an initial Speech And Language Therapy (SALT) screening assessment for all young people as a matter of course.

55% of respondents said their agency includes the Unconscious Bias Training as mandatory training. The CSCP provide this free on the website for anyone working or living in Croydon courtesy of Crystal Palace Football Club who continue to fund this course as well as use our training resources for their staff.

The number of young people on a child protection plan (CP plan) and the number on a plan for more than 18 months has been scrutinised by both QIG and the CSCP Executive. This has led to the creation of a panel to review children subject to a plan for longer than 9 months, which offer greater scrutiny and learning from repeat CP plans. As a result, children are now on a CP plan for shorter periods, Croydon also is lower (better) than statutory neighbours for this indicator.



Contributing to the dataset has helped partner agencies to be more proactive about their own data as well as scrutinising multi-agency data. Early Help colleagues have commented on how the challenge about the data has required them to draw inferences about step up activity and whether threshold application may need further exploration. This happens because our dataset requires some commentary to support the data request, and this encourages each partner to be more curious about the why and not just list the numbers.

IMPACT OF OUR ACTIVITY

CSCP members are seen as experts in safeguarding and the value of the ad-hoc conversations, across the partnership to influence workstreams, provide assurance about the appropriateness of escalations or just make arrangements to attend team meetings to provide safeguarding expertise cannot be underestimated.

CSCP members have been on working groups to influence commissioning such as the Best Start Children's Centre (Aug 2021) and Family Hubs Bid Work (Feb 2022).

In addition to the outcomes detailed in Part 1, the following can also be attributed to our work in the past year.

- Young people's mental health - we have raised the profile and are keeping it visible by using what has been learnt to influence partnership work across the borough.
- Culture of partnership working around mental health has improved which will impact on confidence and the ability of professionals.
- SEND Board - provided SEND specific briefings and CSCP membership at SEND Board/Forums
- New Training:
 - Expanding Cultural Competencies for Safeguarding Professionals working with LGBGTQ+ Young People
 - Challenging Disproportionality - Assessing the Extra-Familial Risk for Black Male Children & their Families
 - Trauma Informed Approach - e-learning module and additional face to face/MS Teams courses

TRAINING

We continued to deliver online training via MS Teams and have re-introduced some face-to-face training more recently. Our e-learning training offer continues to be popular with over 9000 courses completed across child and adult safeguarding content, however this was significantly lower than the previous year. This is somewhat due to the effect of covid on staff availability to commit to training, but is also due to the vacant learning and development post for most of the year.

PART 3: THE WHY NOT?



An analysis of any areas where there has been little or no evidence of progress on agreed priorities

PARTNERSHIP WORKING

Whilst Working Together 2018 requires the 3 Lead Agencies to be equally responsible for discharging their duty, there continues to be an imbalance in both the level of funding applied and the proactivity of each of the partners. This is largely due to historical expectations and is in keeping with other LSCPs.

There are key (and often longstanding), experienced members of the Police and CCG/Health actively engaged at relevant CSCP meetings. However, the drive and direction of the core work more often comes from the Local Authority. This doesn't specifically impact on the effectiveness of the Partnership as when directed, other agencies are responsive, but it does limit the scope and reach of the Partnership. The Independent Review of the CSCP also recognises this. One of the purposes of the review is to make recommendations about how this might be challenged for 2023. An identified risk is that if those key members were to leave, it could significantly impact on the effectiveness of the Partnership.

AUDITS

Ordinarily we would hope to carry out 3 multi-agency audits a year to assess the competency of multi-agency professionals as well as evidence the impact of previous learning or briefings.

Whilst we have not carried out as many as usual, the way we worked instead has led to better co-ordination and drawing on the Partnerships own quality assurance activities.

This year we have utilised the learning from single agency audits where possible. We have also linked up with CSC Practice Week and bi-monthly 'Windows into Practice' events, to open it to multi-agency staff and share the findings via CSCP meetings such as the Learning and Improvement Group. This has led to more front-line professionals accessing briefings and materials usually only open to CSC staff and single agency learning which may have ordinarily stayed within one agency, being shared more widely.



Neglect – this multi-agency audit took place in 2021-22 and was supplemented by the neglect thematic practice Week in March 2022. Activities included Windows into Practice audits, multi-agency appreciative inquiry events, practice observations and multi-agency learning events, including raising the profile of the Graded Care Profile Tool (GCP2 Tool). A strength included *“Professionals are contributing to decision making and oversight of progress. Schools were particularly identified as key players and contributors to planning and progress monitoring”* An area for improvement concluded *“Interventions tend to focus too much on the adult, particularly where adults have significant vulnerabilities, and less on experiences of children.”*

Domestic Violence – CSC and the Police have both undertaken audit work in this area. CSC involved partnership agencies and the Independent Scrutineer in Appreciative Inquiry sessions, the CSCP delivered sessions on themes from safeguarding practice reviews as part of the lunch and learn sessions co-ordinated by CSC Practice Consultants. Partnership working was found to be a strength with *“effective communication & partnership working among agencies are promoting good assessments and support to children and families”*. CSC have shared their findings in detail with the wider partnership via Quality Improvement Group Meetings. The Police have been asked to adopt a similar approach for 2022/23.

In addition, we had the opportunity to be assured of, and challenge the safeguarding arrangements of key agencies, which was very useful for the wider partnership to appreciate the scope and activity of partner agencies which is largely hidden in day-to-day multi-agency work.

- [Police Safeguarding Standards](#)
- [Health Safeguarding Standards](#)
- [Education Safeguarding Standards](#)

PART 4: THE WHAT NEXT?



A record of decisions and actions taken by the partners in the reports period (or planned to be taken) to implement the recommendations of any local and national child safeguarding practice reviews, including any resulting improvements

SAFEGUARDING PRACTICE REVIEW (SPR) LEARNING

Given the number of Croydon SPRs, we have introduced a spreadsheet which tracks the most re-occurring themes for babies & toddlers, children and adolescents.

These themes are used in bi-monthly briefings to both senior leaders and the wider multi-agency workforce. This has helped us to be more SMART when deciding how to implement recommendations across several reviews and has ensured we have more pace to not only complete the recommendations, but share the learning at an earlier stage. Our single page briefings have been commended by professionals as a really helpful way to distil the learning in a more accessible format, especially when they are already stretched for time.

There is an example of the one-page briefing from the Ben SPR overleaf.



1. CRITICAL EVENTS

Ben died from significant injuries, aged two years and one month.

His mother (Ms A) and her new partner (Mr D) have been charged with Ben's murder and causing or allowing the death of a child. Their trial began January 2022.

Ms A was offered a range of services due to her vulnerabilities but did not engage.

Opportunities were missed to identify a new male partner (Mr D) who was known to be a potential risk.

2. KEY INFORMATION AND SAFEGUARDING CONCERNS

- Absence of information sharing between agencies.
- Unsuitable housing and homelessness.
- Coercive control.
- Adverse Childhood Experiences (Ms A).
- Offending behaviour (Mr D).
- Domestic abuse (discussed twice at MARAC whilst pregnant).
- Suspected parental substance misuse.
- Parental mental health.
- Victim of unexplained injuries.
- No engagement with father (separated from Ms A).
- Ms A engaged with services when she perceived a 'need'. Disengaged when 'need' was met.

3. LEARNING

- The need for an understanding of how parenting education is provided for new and inexperienced parents.
- It is Important that Health record as 'was not brought' (to medical appointments or checks) rather than 'did not attend' in mind as a possible indicator of neglect of young children. Health now have a 'Was not Brought' policy in place.
- Keeping the child in mind and the child's experience central, to ensure the voice of the child.
- Assessments, engagement and non-engagement, where parental consent is required - the challenges of seeking to engage vulnerable parents who are not able to work with professionals.
- Assessing the risk of domestic abuse and supporting women who have experienced domestic abuse.
- The importance of tracking known violent adults and identifying them when there are concerns about children with whom they are in contact.
- Practitioners need to understand how professional curiosity can be beneficial to their practice.
- When a referral does not meet the criteria of one service it is important to find another agency to refer the client to e.g counselling.
- Agencies must ensure that practitioners are responsible for making and recording on their system that a referral has been made to another service and do not think that someone else has completed a referral.
- The importance of assessing the whole family, social care assessed brother with disabilities but did not assess Ms A missed opportunity re unborn Ben's needs and to explore Ms A suspected substance misuse.
- Multiple agencies involved with Ms A with one agency across 2 boroughs, important to share information and record information shared.
- Good contact with first health visitor.
- Good practice that Health contacted MASH to discuss and agree an assessment. However the referral did not reflect the discussion and the child protection concerns, refers to social care need to ensure referrals reflect safeguarding concerns and meet thresholds.

4. ACHIEVING CHANGE

Reflect on the findings and discuss the implications for your practice/team. Outline steps you/team will take going forward.

The full SPR Report can be downloaded at: www.croydoniscb.org.uk



We are measuring the attendance at multi-agency learning events and capturing what they knew before the session and what they know after the session. It is harder to quantify how the learning impacts on front line outcomes for children. Audit activity gives us a snapshot at that time. The move to a more joined up dataset should help the CSCP to better understand its impact.

SAFEGUARDING ASYLUM SEEKERS

Government policy is changing and we are ensuring we are sighted on the multi-agency work within the Asylum Seekers/Homes For Ukraine space as well as offering training support for those public and professional people supporting asylum seekers. Croydon has over 1000 asylum seekers placed in hotels as well as Ukrainian refugees, some of these are families. The CSCP will need assurance of the multi-agency safeguarding arrangements for these potentially vulnerable people.

EARLY HELP TRANSFORMATION

The wider partnership are sighted on, and involved in, the Early Help Transformation work. This is an area where CSCP safeguarding leads and other multi-agency professionals can work closer and smarter to ensure less overlap whilst retaining maximum impact and impetus on the themes already identified:

- Greater professional curiosity
- Understanding who the significant adults are in children's lives
- Better information sharing

PARTNERSHIP COMMUNICATION STRATEGY

It is time to consider refreshing the terms of reference for the Partnership to ensure continued understanding of the roles and responsibilities as well provide a framework for partners and their organisations to work within.

The methodology for sharing briefings/learning materials and measuring the effectiveness of the messaging as and well as work to strengthen data sharing will also be included.

Information sharing, within systems and services/agencies is too varied. New work is underway to 'explain on a page' the different organisations and processes that sometimes work in isolation, with very similar cohorts. This should help the wider partnership to understand the landscape we all work in, and identify spaces, places, services and people who might not have been as visible before. Refreshed guidance on information sharing, as well as a focus on a new Partnership Communication Strategy will also achieve better results in this area.



DOMESTIC ABUSE

Now children are recognised as victims in their own right, the CSCP will consider how it can best ensure that the incidence and impact of domestic abuse where children are present is fully understood and that professionals are using all the tools and skills available to them to mitigate the impact of domestic abuse and protect children from becoming victims.

Our own SPRs and the National Report relating to Star & Arthur feature Domestic Abuse. The voice of the child and the extended family were poorly articulated and this feature will also be an area of examination for next year.

SEXUAL ABUSE

The CSCP recognises that its data and understanding of who the victims of child sexual abuse (CSA) are and how we are working together to reduce it is poor. Whilst the Violence Against Women & Girls Strategy is being refreshed, it will not actively address this risk. More work is required in this area including intra and extra familial abuse and supporting professionals to have constructive conversations in this tricky domain.

INDEPENDENT REVIEW

The CSCP Executive have commissioned an Independent Review of the Partnership to assess the effectiveness of the Partnership. The findings of this work will influence the 2023 work plan.

PART 5: WHAT CHILDREN & FAMILIES SAY



Ways in which the partners have sought and utilised feedback from children and families to inform their work and influence service provision

MENTAL HEALTH PRIORITY GROUP

We influenced some of the questions due to go out in the school surveys over the next 2 years to gather feedback about what young people think about their mental health and whether they know where to go for support.

YOS

Improved their data capture and recognised the disproportionality of young Black males and those with a learning disability or SEND. As a result they have introduced a Disproportionality Dashboard which has been recognised and circulated as a good example of how to make service improvements.

CAMHS

A clinician working with a family needed to refer them to SPOC. The family was very anxious about this, however the way CAMHS/CSC worked together was very supportive and continued alongside the assessment. The family said they felt very supported and their fears about being blamed were unfounded. The outcome for the family was positive.

As a parent you only ever want the best for your children, and it was so comforting to know that Early Help had exactly the same view. M and Early Help made sure that my daughter and myself were fully supported on this journey, by displaying patience empathy and understanding

Parent feedback re. keyworker Sept 2021

When my son and I first met V the risk was extremely high. However, with the help of V's plans that were acted upon, this risk was massively reduced. Everything that V has promised us, she has not failed to follow through. My son is now living a happy and stable life, he is due to start his mentoring at Palace for Life next week, this again is V's doing.

Parent feedback re. EH Social Worker August 2021

She has helped my daughter to become more confident by getting her the support she needs and In return has also given her a voice about the things that have happened to her which will eventually come in useful as she grows older so she will be able to stand up for what is right for herself making her a more confident young lady.

Parent feedback re. keyworker June 2021



CHILDREN IN CARE COUNCIL

Empowerment, Memories, Positivity, Interesting, Respect and Educational.

E.M.P.I.R.E's purpose is to empower children looked after and care leavers with the confidence to influence policy change. It allows them to shape the service and have their voice heard. They also get the chance to make new friends, go on trips and engage in activities they may not have had access to without the support of the E.M.P.I.R.E Team. All children and young people automatically become E.M.P.I.R.E members from the day they become looked after by Croydon. The team manager now sits on the CSCP Learning & Improvement Group to help bring the voice of care experienced children into the plans for learning and development of the wider workforce. They ensure there are a wealth of holiday activities for E.M.P.I.R.E children and workshops such as "Living Independently" and support for foster carers. Some of the quotes from E.M.P.I.R.E children, about the support they receive from the E.M.P.I.R.E Team include:

You guys never let us down and I respect that.

All of my good memories of my childhood happen at E.M.P.I.R.E - no one would take me the places you do.

You give us real life advice and stop us making silly decisions.

E.M.P.I.R.E is literally one big family.

E.M.P.I.R.E gave me a laptop that helped me do my coursework at home as I have anxiety and was struggling to go to the library.

The CSCP publish this report to summarise its work in 2021/22. You can find more information on our website <https://croydonicsb.org.uk/> as well as details of how to contact us.

GLOSSARY

BME

Black Minority Ethnic

BCU

Basic Command Unit

BME

Forum Black
Minority Ethnic Forum – A
Community Partner

CAMHS

Child & Adolescent Mental
Health Service

CAP

Complex Adolescent Panel

CCE

Child Criminal Exploitation

CCG

Clinical Commissioning
Group

CDOP

Child Death Overview Panel

CDR

Child Death Review

CHat

Child Health at home

CHIST

Croydon Health Integrated
Safeguarding Team

CHS

Croydon Health Service

CIN

Child in Need

CLA

Children Looked After

CLIP

Croydon Local Intelligence
Programme

CP

Child Protection

CPFC

Crystal Palace Football Club

CQC

Care Quality Commission

CSC

Children's Social Care

CSE

Child Sexual Exploitation

CWD

Children with Disabilities

CYP

Children & young people

DA/DASV

Domestic Abuse/ Domestic
Abuse & Sexual Violence

ETE

Education, Training &
Employment

FGM

Female Genital Mutilation

GCP2

Grade Care Profile version 2

HV

Health Visitor

ICPC

Initial Child Protection
Conference

JSNA

Joint Strategic Needs
Analysis

KPI

Key Performance Indicator

LADO

Local Authority Designated
Officer

LCSPR

Local Child Safeguarding
Practice Review

LeDeR

Learning Disabilities
Mortality Review

M/A

Multiagency

MACE

Multiagency Child
Exploitation Panel

MH

Mental Health

PH/PHN

Public Health/Public Health
Nursing

QA

Quality Assurance

RISE

Refuge, Information,
Support and Education
Charity

S & L/ SALT

Speech & Language/
Speech & Language Therapy

SCR

Serious Case Review

SEND

Special Educational Needs &
Disabilities

SLAM

South London & Maudsley
NHS Trust

SPOC

Single Point of Contact

SYV

Serious Youth Violence

TAS

Team Around the School

VAR

Vulnerable Adolescent
Review

VOC

Voice of the Child

WT

Working Together 2018

YAG

Youth Advisory Group

YOS

Youth Offending Service

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REPORT TO:	CABINET 16 November 2022
SUBJECT:	Croydon Safeguarding Adult Board Annual Report 2021/22
LEAD OFFICER:	David Williams, Independent Chair, CSAB Annette McPartland, Corporate Director of Adult Social Care and Health
CABINET MEMBER:	Cllr Yvette Hopley, Health & Social Care
WARDS:	All
FINANCIAL IMPACT	
<p>There are no direct financial implications arising from this report as all priorities within the 2021/22 Croydon Safeguarding Adult Board Annual Report has been funded through the Adult Social Care budget and allocations from the statutory partners for the CSAB (Health and Police).</p>	
FORWARD PLAN KEY DECISION REFERENCE NO.: This is not a key decision	
<p>The Executive Mayor, in Cabinet, is recommended:</p> <p>1. RECOMMENDATION</p> <p>To note the content of the Annual Report for the Croydon Safeguarding Adult Board. The report will be considered by Cabinet on 16 November 2022 and to receive the recommendations arising from the Health and Social Care Scrutiny Committee taking place on 18 October 2022.</p>	

2. EXECUTIVE SUMMARY

- 2.1 This is a copy of the Croydon Safeguarding Adults Board (CSAB). The report was ratified by CSAB (as outlined by S43 Care Act and the statutory guidance) on 26 October 2022.
- 2.2 The purpose of the CSAB Annual Report is to detail the activity and effectiveness of the CSAB between April 1 2021 to 31 March 2022. The report is submitted by the CSAB Independent Chair, David Williams who was appointed to this role on the 5 September 2022 so was not in post during the period of time which the report covers. It ensures that the statutory partners (Council, Health and Police), residents and other agencies are given the opportunity to provide objective feedback on the work and effectiveness of local arrangements for safeguarding adults. The report covers the 2021/22 priorities demonstrating what has been achieved and the work which needs to continue throughout 2022/23. It is important to note that the remit for producing these reports is that it is produced as a public facing document.

- 2.3 The Performance and Quality Assurance sub group has continued to focus on collecting, monitoring and improving the data for the CSAB Dashboard. The data has improved with partners working together to ensure data is fit for purpose and is used to progress the board's priorities. It is also important to note that this work continues in order to further improve the data collection.
- 2.4 Engagement and communication across the partnership is key to the work of the CSAB which has been excellent during this year and this is evidenced in both attendance at the CSAB and sub group meetings but also by the willingness of all partners and agencies to contribute to the Annual Report.
- 2.5 Four Safeguarding Adult Reviews (SARs) were undertaken and completed during the year with the full reports and 7 minute briefings published on the CSAB website. Summaries for Mr Hong, Duncan, O1 and Madeleine are included within this report.
- 2.6 The CSAB will continue to use tools and learning in order to mitigate the risk of safeguarding across the partnership. This will include the continuation of themed multi-agency audits, learning events such as the Homeless workshop, shared learning from SAR recommendations and the LondonADASS Safeguarding Adult Partnership Audit Tool.

3. Croydon Safeguarding Adult Board [CSAB] Annual Report 2021/22

- 3.1 The Annual Report is introduced by the Board's Independent Chair David Williams who took up post on 5th September 2022. The Chair will be supported at the October meeting by the statutory partner leads for Health, Local Authority and Police.
- 3.2 The Report is due to be presented to Cabinet on the 16th November following the report being shared at the CSAB quarterly meeting in October. It is an important function of the Council to have oversight of the adult safeguarding activity in Croydon. It provides an update on the multi-agency work by the CSAB partnership to safeguarding adults in Croydon and how the agencies work together.
- 3.3 Information is submitted by partners, agencies and residents, on the activities they have undertaken throughout the year aligned to the board priorities. It is also an opportunity to share with the CSAB their priorities going forward.
- 3.4 Safeguarding statistics can be found on pages 7 – 9, this includes data submitted to the Department of Health and Social Care (DHSC) in July 2022. The data within this report looks at safeguarding referrals received during 2021/22 and whether they have progressed to a safeguarding enquiry for further investigation. Where appropriate percentages and numbers have been included along with a breakdown of the source of referral.
- 3.5 The data shows a drop in contacts which become adult safeguarding concerns / referrals. This is a result of the changes in process. Croydon Adult Support team now screen all 'at risk contacts' to ensure they are appropriate for a safeguarding response. What we have found in the past is many such contacts are better dealt

with outside the safeguarding process in a more supportive / preventative model which generally results in better outcomes for Croydon residents. It also is positive for the safeguarding system ensuring that the safeguarding process of S42 Enquires is focused on those people who would benefit from this intervention. This change in process has enabled a stronger focus on prevention.

- 3.6 The data is telling us that Asian/Asian British are underrepresented for safeguarding referrals compared to the ethnicity of Croydon's population. Black/African/Caribbean/Black British safeguarding referrals are 1% below the Croydon's population percentage. This is in line with national data and there has been much work undertaken in Croydon to raise awareness within the community. The CSAB Voice of the People sub group has been leading this work and will continue as more work needs to be done.
- 3.7 Some other highlights from the data around the types of alleged abuse which shows there has been a slight increase of 1% with regards to the category of neglect and a decrease from 20 – 18% in relation to financial abuse, both percentages are in line with the national picture. However, we are concerned that there will be an increase in financial abuse, going forward, given the cost-of-living crisis. This has previously been the pattern at times of financially difficult across society. Domestic Violence has increased from 6% to 10% from last year and like the national data and again we expect that this will increase going forward.
- 3.8 A breakdown of where alleged abuse takes place is similar to last year's data showing that 75% of closed safeguarding enquires were in the community and 25% located in Care Homes.

National comparison data is currently not available and it is estimated that this will be published later this year. These are provisional figures within this report and currently proceeding with the ratification process.

- 3.9 The report covers work undertaken and identifies further work needed under each of the priorities. Below are some examples taken from the report for each of the priorities:

Prevention (Page 17)

SARs have continued to be commissioned and learning taken forward across the partnership showing good work between ASC and Mental Health. Learning has been in the form of events, team meetings and training via Bitesize training. The work around the ICN+ continues to grow and page 19 shows the latest information. The Southwest London Integrated Care System has come into existence replacing the CCG from the 1st July 2022. The change in process outlined 2.4. is also a contribution in supporting this priority.

Commissioning (Page 21)

The CSAB Intelligence Sharing subgroup has continued its regular meetings having oversight of the provider market. Engagement and information from all agencies and partners has been excellent. The Local Authority commissioning are now part of ASC ensuring a more integrated development of services and a

response to safeguarding issues. They produce a monthly report showing quality of provider provision in the borough.

Making Safeguarding Personal (Page 22)

Reshaping of the LA safeguarding process ensuring that all referrals receive a measured and personalised response. Introducing an 'at risk' contact stage to see if there is a better way of managing the matter than going through the s42 process. Outcome has been to have a more balanced response with better outcomes. Working in partnership with Ingram Court Youth Hostel, NHS SWL CCG hosted a health and wellbeing day for young people experiencing homelessness to reduce barriers to accessing health services.

Quality and Improvement (Page 23)

The Performance and Quality Assurance sub group have continued to focus on collecting and monitoring data on the CSAB Dashboard. ASC data is more accurate and is telling us that we are focusing on the right areas – fewer concerns but more enquiries. Work has included refreshing indicators in order that these are in line with the CSAB priorities and inform planning and practice. The Police continued their focus on providing support and advice to investigating officers to improve their knowledge around mental health, including working with partners to ascertain the single points of contact.

There has been a positive change in who submits Safeguarding Adult Review requests, these are now being received from across the partnership.

A well received presentation given to the CSAB members by the S42 team outlining the referral process and providing case examples. This was rolled out to the GP Forum, Health colleagues and to the London Lived Experience Group.

Voice of the People (VOTP) (Page 25)

Members of the VOTP sub group have presented 'Keeping you Safe' to forums and groups in Croydon to raise awareness of the safeguarding process and the work of the CSAB. These have included provider forums, Care Home Managers, Domiciliary Care Forum, BME Forum with further events in the community planned. The S42 team presented the work they are doing around the Service User feedback questionnaire.

The Chair of this sub group is highly engaged in the London Lived Experience Group and Croydon have shown their support from the outset of this work.

Communication and Engagement (page 26)

The CSAB has excellent engagement across the partnership and this is evidenced by the attendance at both the Board meetings and sub groups. Partners are represented across all agencies and with partners keen to take on the roles of Chair and Vice Chair of the sub groups.

Strong links made with other SABs in London with increased engagement with both national and London networks, this enables the CSAB to share information developed in Croydon and to learn from other SABs.

At the February CSAB Development Day the feedback from all sub group chairs emphasised to the external facilitator that all members for each of the groups were highly engaged and supported the work of the CSAB.

The Development Day set out priorities for 2022/23 (page 28) which were tweaked slightly from this report's priorities. The Board has seen the recruitment of a new Independent Chair, David Williams who is now able to announce that Andrew Brown the CEO, Croydon BME Forum has agreed to be his Vice Chair. The CSAB continued to carry out its day-to-day work using different ways of working i.e. virtual meetings. This has proven a success with attendance at meetings high.

4. CONSULTATION

- 4.1 The three strategic partners [Local Authority, Health and Police] along with other organisations, voluntary sector, residents and agencies have contributed to the annual report. Resident feedback and the Lay Member comments have also been included within the report.
- 4.2 Contributions are gathered by partners completing a contributions templated and also by continuous recording of work undertaken using the CSAB meeting structure of the board and it's sub groups. Contributions are also sourced by attending events and workshops.
- 4.3 The Annual Report was signed off by the CSAB at the quarterly meeting on the 26 October.

5 PRE-DECISION SCRUTINY

- 5.1 The report was presented to Scrutiny on the 18th October 2022 by David Williams, the CSAB Independent Chair and supported by Adult Social Care, Health and Police colleagues.
 - a) The Sub-Committee recommended that information in the report from the 2011 Census was replaced with more up-to-date information or predictions, and that ethnicity data distinguished between 'White – Other' and 'White – British'. Following the meeting performance colleagues confirmed the 2021 census data was used for this year's report, but need to bear in mind the data hadn't been fully released. The full demography data won't be released until November so the data pages will be changed along with the ethnicity data mentioned above prior to publication.
 - a) The Sub-Committee requested the inclusion of more quantitative data in the next Croydon Safeguarding Adult Board (CSAB) Annual Report including trends and comparisons over previous years and with other similar local authorities. Following Scrutiny the CSAB members signed off the report on the 26th October with agreement and actions to take this recommendation forward, it was agreed to be more focused on outcomes, particularly being mindful of evidence based results for future reports with more anecdotal evidence from service users and professionals.

6 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 6.1 There are no direct financial implications arising from this report as all priorities within the 2021/22 Croydon Safeguarding Adult Board Annual Report have been funded through the 2021/22 Adult Social Care budget and the partner allocations.
- 6.2 The CSAB is funded from allocations from the partners and therefore has a multi agency budget and the budget breakdown can be found on page 33 of the report.

Approved by: Mirella Peters, Finance Manager

7. LEGAL CONSIDERATIONS

- 7.1 Pursuant to Schedule 2 of the Care Act 2014, as soon as feasible after the end of each financial year, the CSAB must publish a report on:
- What it has done during the year to achieve its priorities.
 - What has been done during that year to implement its Strategic Plan.
 - What each member has done during that year to implement the strategy.
 - The findings of reviews arranged by it under section 44 (Safeguarding Adult Reviews) which have concluded that year (whether or not they began in that year).
 - What has been done during the year to implement the findings of a review arranged by it under that section.
 - Where it decides during that year not to implement a finding of a review arranged by it under that section, the reasons for its decision.
- 7.2 The CSAB must send a copy of the report to the Chief Executive and the Lead of the Council, the local policing body the whole or part of whose area is in the local authority's area, the Local Healthwatch organisation for the local authority's area and the chair of the Health and Wellbeing Board for that area.

Approved by Doutimi Aseh, Head of Social Care & Education Law on behalf of Stephen Lawrence-Orumwense, Director of Legal Services and Monitoring Officer.

8. HUMAN RESOURCES IMPACT

- 8.1 There are no direct Human Resources implications arising from this report for Croydon Council employees.

9. EQUALITIES IMPACT

- 9.1 The Council has a statutory duty, when exercising its functions, to comply with the provisions set out in the Sec 149 Equality Act 2010. The Council must, in the performance of its functions, therefore have due regard to:

- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;

- (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

9.2 A key priority for the Council and the CSAB is ensuring we work with our partners to make Croydon a stronger and fairer place for all our communities and be a more inclusive borough free from racism and discrimination. The impact of the proposals that have been and/or will be delivered through the structures outlined in this report are expected to have a positive impact on residents with different protected characteristics, in particular the demographic groups which are under represented in the safeguarding data and this work was a priority for the board this year. This will include linking with other pieces of work undertaken across the partnership, the board's 'Voice of the People' has continued to develop this work with one of it's priorities being to raise awareness across all communities. [Page 25 of the report]. The membership of this sub group has grown and includes representation from the BME Forum, Mind in Croydon, ARC and people with lived experience and through this group the board has been able to attend events and link with other community groups which includes a Memory Café, Rotary Association and the BME Forum.

9.3 Quality assurance data provided in the annual report is designed as a summary set of information and is provided at a high level, these are sourced from the data submitted to the Department of Health & Social Care in July 2022. The dataset has also been configured to look at those safeguarding enquiries and to establish where the adults at risk experienced abuse, the type of abuse, who was suspected of abusing and the outcome. As a multi-agency board and with an independent identity the CSAB Performance Dashboard will still enable Croydon Safeguarding Adult Board to assess its impact against the Council's Equality Policy and statutory Equality Objectives. Although partner agencies cannot be held accountable to these, as statutory agencies they will have their distinctive organisational equality objectives and policies, under the Public Sector Equality Duty.

Approved by: Denise McCausland, Equality Programme Manager

10. ENVIRONMENT AND CLIMATE CHANGE IMPACT

10.1 None

11. CRIME AND DISORDER REDUCTION IMPACT

11.1 None

12. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

12.1 That the Council notes the work and effectiveness of the CSAB in ensuring the safeguarding of vulnerable adults in Croydon but also to note the planned work to take place in 2022/23.

13. OPTIONS CONSIDERED AND REJECTED

13.1 None

14. DATA PROTECTION IMPLICATIONS

14.1 **WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?**

NO

14.2 **HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN COMPLETED?**

NOT APPLICABLE

(If yes, please attach a copy).

There is in place across all London Boroughs a robust Data Sharing Agreement with all partners on the Board including the Metropolitan Police and South West London CCG. This agreement has been developed by London ADASS and is a London wide agreement and signed off by all partners.

This annual report evidences that over the last year further improvement and development of the reach and impact of the work of the Board has continued.

(Approved by: Simon Robson, Director of Adult Social Care Operations, and Deputy DASS)

Guidance Notes

There are no data protection implications within this report.

CONTACT OFFICER: Denise Snow, CSAB Manager

APPENDICES TO THIS REPORT – Attached CSAB Annual Report 2021/22

Croydon Safeguarding Adults Board

Annual report
2021 / 2022

“Working together
safeguarding, supporting and
making services better for
adults in Croydon who are at
risk of abuse and neglect.”



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Foreword by the Independent Chair



Welcome to the 2021/2022 Annual Report of the Croydon Safeguarding Adult Board

This is my fifth annual report and my last as Independent Chair of the Safeguarding Adults Board (SAB) in Croydon. I am delighted to hand over to the former Vice Chair of the Safeguarding Adults Board, David Williams. I'm very aware of the value his considerable expertise and experience will bring to the role.

This report reflects a period of time when lives of all residents of Croydon continued to be heavily affected by Covid. All services responded to ensure the safety of those most vulnerable and became ever more flexible, working hard across previous boundaries, focused always on responding to need. Safeguarding Adults Board Members played their role in working together supporting, challenging and improving services throughout that time.

It has been my honour and my privilege to lead a growing and developing Safeguarding Adults Board (SAB) through those periods of unprecedented change and challenge. I have appreciated the opportunity to do so. The engagement in Safeguarding Adults work coming from extraordinarily busy operational services across all partnerships during a time of extreme pressure, has been remarkable to experience.

The SAB reorganised in 2018 and establish a board with working subgroups all led by experts in their field and attended by relevant managers and staff from each of the services. The Chairs and Vice Chairs of those subgroups informed and led progress that has made services safer for residents of Croydon.

As a group, those Chairs were a source of support to me and informed and shaped our shared agenda. Always helping us remain relevant to services, ensuring high levels of engagement.

They are the Serious Adult Review Sub Group (SAR) led by Dr Shade Alu which assesses whether cases referred meet the criteria for a serious adult review or a different kind of response.

The Performance subgroup, led by Nick Sherlock provides important assurance to the Board about the volume and quality of safeguarding adult services in Croydon informed by cross sector data and narrative from operational managers.

The engagement subgroup led by Nicky Selwyn in recent years quickly engaged senior leaders and managers from a range of organisations providing services, especially those from minority ethnic communities. Through that we are assured that services are working hard to meet the needs of all residents of Croydon.

The Learning and Development Subgroup, led by David Lynch from the South London and Maudsley is focused on making sure we, in all sectors, learn from incidents where services have not, provided what was needed to keep people safe. So improvement continues.

Foreword by the Independent Chair



Welcome to the 2021/2022 Annual Report of the Croydon Safeguarding Adult Board

The intelligence Sub Group, developed in Croydon, brings together important information across all sectors about residential nursing and home care services. This is for obvious reasons extremely important to the Safeguarding Adults board and we are fortunate to have Estelene Klassen as it's Chair.

This report is a reflection of the hard work, commitment and expertise of all Sub Group and SAB Members. It reflects their willingness to work together to challenge and support and make improvement in services to the public.

I want to thank all SAB Members for their work and support over the past five years and especially want to thank the safeguarding adults board team Denise Snow and Lesley Weakford for providing much needed support to the Board during my tenure.

I commend this report to you and warmly recommend that you read it and look at everything that's happening in Croydon to make services safer. I wish the board and the ongoing work on Safeguarding Adults in Croydon every success.

Annie Callanan
Independent Chair



Welcome to David Williams, the newly appointed Independent Chair

After 17 years of safeguarding experience in my previous role I am excited to take on this new role. I firstly would like to thank Annie, the previous chair, for her commitment and determination in progressing the board's agenda and profile over the last 5 years. My focus going forward will be on the Voice of the Community, helping to encourage prevention strategies across all partners to reduce risk. I want to ensure the profile and learning from the board and its vibrant sub-groups, helps to inform and develop best practice across agencies with the aim of improving outcomes for the most vulnerable. In addition, I am very pleased to announce that Andrew Brown, Chief Executive of the Croydon BME Forum, has agreed to take on the role as the Vice Chair of the Board and is also passionate about taking the progress of the Board forward



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Voice of the People



Mr X feels so much better after speaking to me and appreciates me contacting him. It was agreed that xxx could call me if he thinks of anything and I will be in touch.

[Feedback to S42 Team]

Mind in Croydon have picked up more safeguarding alerts than ever as we provide more services to more people across the borough

[Mind in Croydon]

I know XX agree that without your concern in the circumstances surrounding XX case we may not have got this far. We asked for our thanks to you to be recorded in minutes of the meeting on Thursday, since you had to leave the meeting before it ended.

[Feedback to S42 SW]

Feedback received from an adult the SW was supporting around domestic abuse. The adult is being supported to move to extra care housing after many years of abuse from her partner.

“I just wanted to thank you from the bottom of my heart for all your advice! Support and kindness. I really do appreciate it. You have been so kind and I do not know how I would have coped without your support and guidance.”

Thank you for this and your other reports, and for your support to the family in taking the initiative to establish this safeguarding review.

I know Miss X and Miss Y agree that without your concern in the circumstances surrounding Miss Z case we may not have got this far. We look forward to the SAR and hope to get to the whole truth, to have answers to the many failings that have been identified, and some accountability, so this terrible tragedy doesn't happen to somebody else.

[Comment from family on a S42 Social Worker]

Providers are telling us that they feel more supported and see that Croydon as a total system is supporting a market that supports our residents

Good Practice Across the Partnership



Working along side the National and London SAB Chairs networks it has been proposed to escalate to the DHSC an issue of the lack of strategy when it came to placements/accommodation within the Madeleine SAR.

Other boroughs across London are also taking the learning from the Madeleine SAR by taking the recommendations forward.

What is the adult at risk saying?

There is evidence of partnership working across statutory partners and the voluntary sector.

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Working in partnership with Ingram Court youth hostel, NHS SWL CCG hosted a health and wellbeing day recently for young people experiencing homelessness to reduce barriers to accessing health services. In collaboration with partners from local health and care services including [Mind in Croydon](#), [Off the Record](#), [Change Grow Live](#), [Aids Healthcare Foundation \(AHF\)](#) and NHS sexual health, the health promotion event created an opportunity for vulnerable young people to familiarise them with the free health and care services available throughout Croydon.

Mind in Croydon and BME Forum working together on the MHPIC, Mind in Croydon have been able to pick up more safeguarding alerts as this service gives them further reach into communities – visiting people at home.

SLaM and the BME Forum jointly hosted a ADHD and Autism support group in February 2022 for clients while waiting to be seen by the neurodevelopment team at SLaM.

The Police established a one front door approach for strategy meetings to increase the number of strategy meetings the police are able to attend. This has included establishing a weekly escalation meeting between partners to ensure learning and best practice are shared.

A new collaboration between Mind in Croydon, Croydon BME Forum and the South West London CCG – the Croydon Health and Wellbeing Space (CHWS) – a space for early intervention and BME engagement

Response to provider failure – increased amount of inspections of provisions happened in the second half of 2021/22 as pandemic shift changed. Several examples of cross partner work to increase quality of care and see sustainable improvements

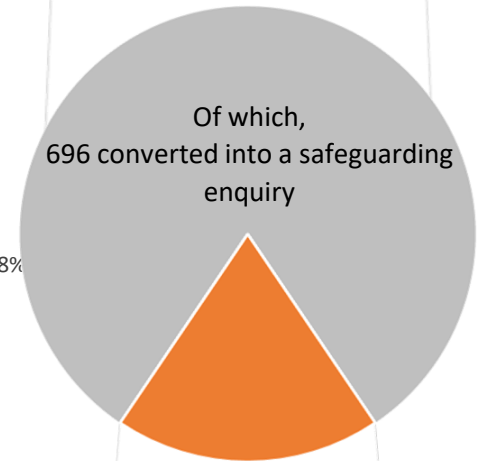
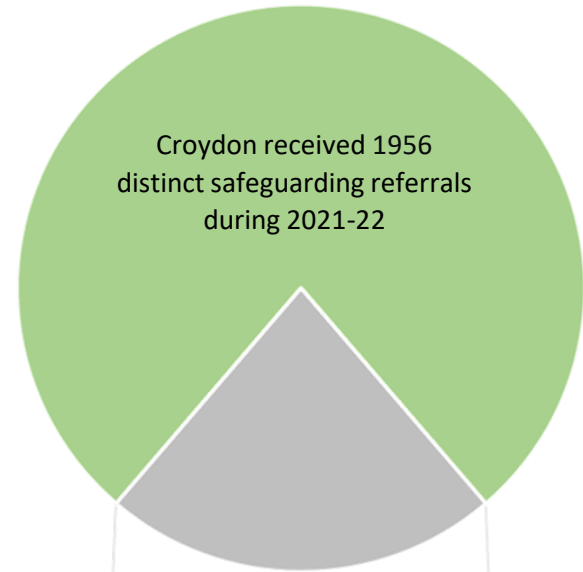
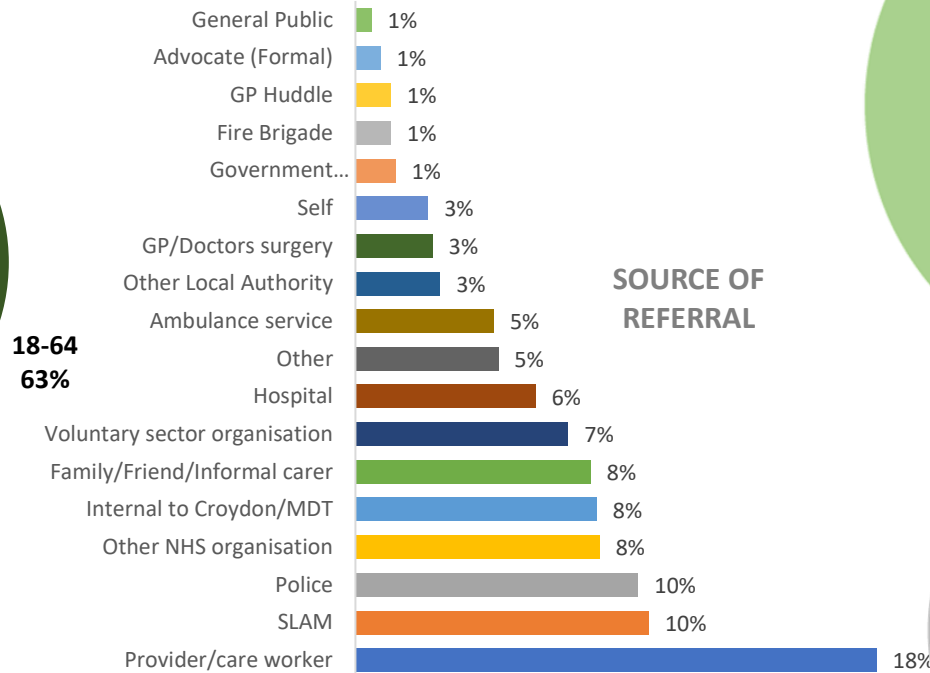
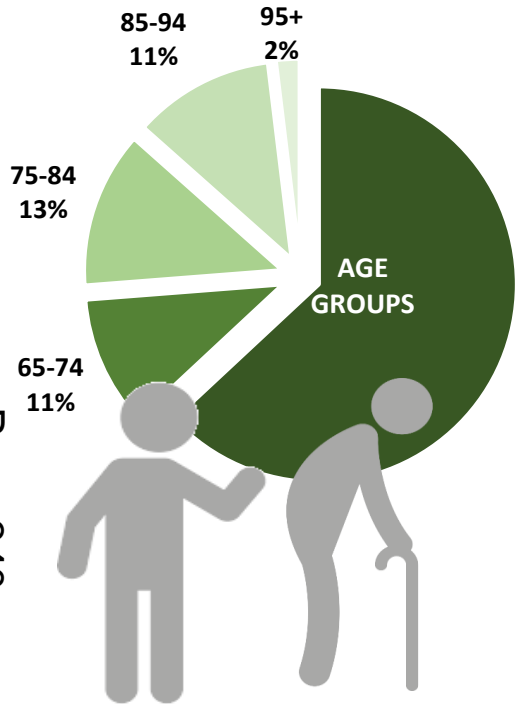
Safeguarding Statistics 2021 / 2022



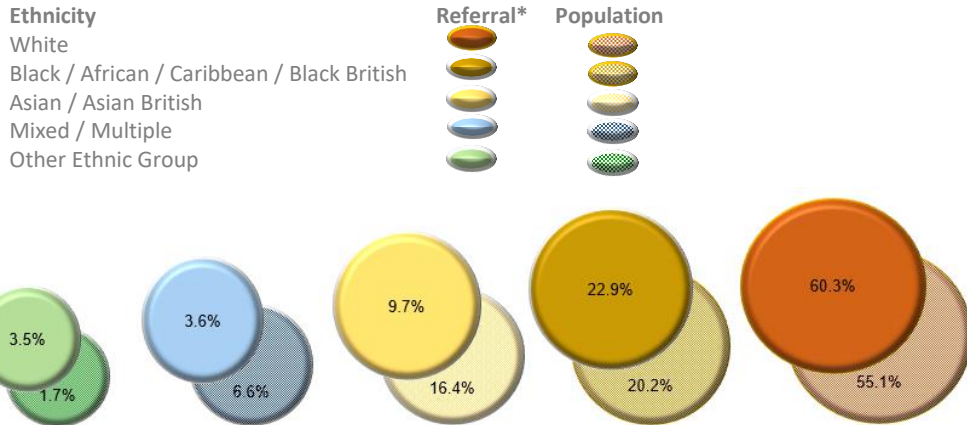


Safeguarding Referrals Received during 2021-22

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ETHNICITY OF REFERRALS vs ETHNICITY OF CROYDON POPULATION



Compared to the ethnicity of Croydon population, Asian / Asian British are underrepresented for Safeguarding Referrals.

Black / African / Caribbean / Black British safeguarding referrals are 1% below its Croydon population percentage.

**Of those with an outcome

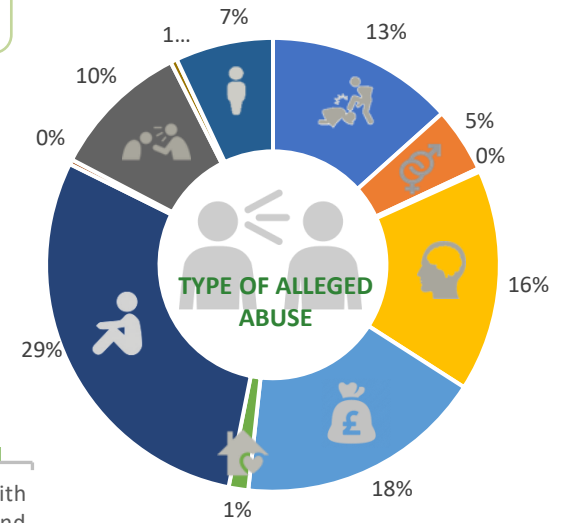
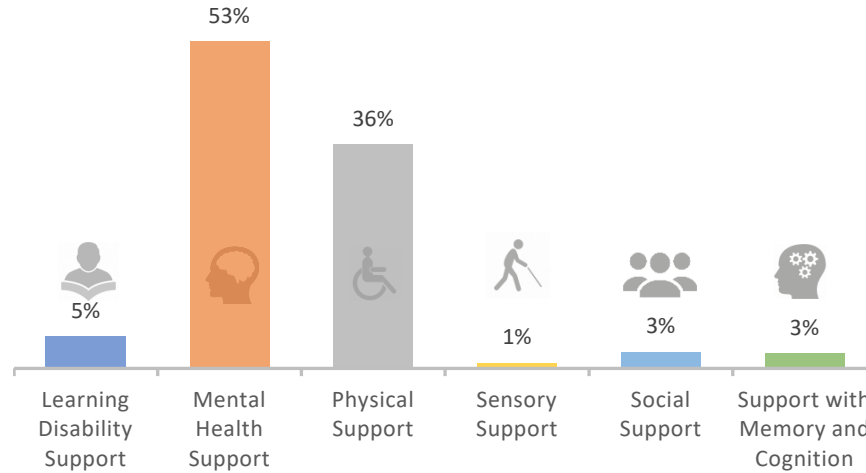


Safeguarding Enquiries Started during 2021-22

Of the

698

Safeguarding Enquiries started in 2021-22 (up from 524 in 2020-21)



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Of which, 76% of closed safeguarding enquiries were located within the community (compared to 77% in 2020-2021)



Of which, 25% of closed safeguarding enquiries were located in a Care Home (up by 3% from 22% in 2020-2021)



Of which where a risk was identified, 94% resulted in risk reduction or removal (up by 7% from 87% in 2020-2021)



Of which, 98% of adults felt they lacked mental capacity but they were all supported by an advocate, family member or friend (up by 24% from 74% in 2020-2021)



Of which, those that were asked their desired outcomes, 94% were either fully or partially achieved. up by 8% from 86% in 2020-2021)

251	Neglects and Acts of Omission
152	Financial or Material Abuse
136	Psychological Abuse
115	Physical Abuse
85	Domestic Abuse
60	Self-Neglect
40	Sexual Abuse
12	Organisational Abuse
4	Sexual Exploitation
3	Discriminatory Abuse
2	Modern Slavery

Lay Member



The role of Lay Member

A Lay Member will act as an independent voice and offer a wider perspective that recognises the diversity of our local communities in Croydon. Croydon SAB currently has one Lay Member who provides this contribution to the Annual Report and sits on both the Board and the SAR Sub Group.

Lay Members play an important role in the oversight, scrutiny, decisions and policies made by the Croydon Safeguarding Adults Board.

The CSAB are keen to recruit further Lay Members going forward.



CSAB Meetings

The meetings of the Board have been enriched by the presentation of cases. The complexity and challenges of some people's lives and the need for effective and timely support are well demonstrated.

Safeguarding Adult Review [SAR] Sub Group

The SAR sub-group has commissioned more SARs and learning reviews. The completed SARs have provided a large number of important recommendations to improve services and provide more effective and coordinated interventions. A particular challenge involves people (often young people) being placed in Croydon by other local authorities.

Safeguarding Adult Reviews



The CSAB published four SARs during this year and below you will find the summaries for each of the reviews outlining the background and recommendations. The link below will take you to the full reports and the 7 Minute Briefings which provides updates on the recommendations.

<https://www.croydonsab.co.uk/about-us/safeguarding-adult-reviews/>

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**Mr Hong
Duncan
O1
Madeleine**

Safeguarding Adult Reviews – Mr Hong



Background

Mr Hong was 59 years old when he died. He came from the People's Republic of China and was a failed asylum seeker in the UK, where he had been living on his own for over 17 years. Mr Hong's first language was Mandarin and he had limited use of English.

Mr Hong had kidney failure and received regular kidney dialysis in hospital. He was also lonely, depressed and anxious about his future. Following a long stay in hospital, Mr Hong was discharged to a nursing home where, three weeks later on 12.07.17, he killed himself by hanging using the alarm pull cord in his room.

Key Learning

History taking, identifying risk factors, spotting patterns and escalation are essential activities in managing suicide risks. Mr Hong had chronic health problems, reduced quality of life and little social support. He was isolated and lonely since he had little understanding of English. Mr Hong was a man who had experienced stressful life events and was from an ethnic minority group. His asylum claim and right to appeal had been rejected and he faced deportation. Find out about people's lives and how their experiences and understanding of them might increase their risk of suicide. Suicide can be hard to predict and prevent so make sure that everyone involved in a suicide safety plan, including the person at risk of suicide, agrees and understands what the plan is and what their role is. Do not be falsely assured that just because a plan is in place, it will be followed properly. Mr Hong's alarm cord

was removed but was then returned to him so he could call for help. Always check.

Use interpreters and advocates for people who do not speak English and who are isolated. Do not rely on ad hoc interpreting arrangements and contact community groups and other cultural and language-based services even if they are not in your local area. Mr Hong was maintained in isolation. Make sure that someone who does not speak English understands what is happening to them and what the options available to them are.

Work together with social and health services, care providers and the Home Office to support people who are seeking, or have failed to claim, asylum. Share information and concerns and agree how best to meet social and health care needs.

What has changed

The Home Office has introduced local safeguarding teams to improve how asylum decisions are served to potentially vulnerable people. The Language Line interpreting service provides Mandarin speakers. The London Borough of Croydon is introducing a Dynamic Purchasing System to expand the range of providers who can meet specific cultural needs. The LB of Croydon social workers, in an emergency, can authorise services for up to three days without managerial approval.

Safeguarding Adult Reviews - Duncan



Background

Born on 29 April 1983 and died at the age of 35 on 5 October 2018. He was White British and had fallen from a building and the cause of death was regarded as a possible suicide. Records indicate he had been adopted at the age of 7 but later his relationship with his adopted parents is said to have broken down but he didn't speak about his life.

Duncan had a longstanding mental health problems dating back to around 2008, with several hospital admissions under sections 2 & 3 of the Mental Health Act 1983. He had various diagnoses recorded including paranoid schizophrenia. There is an history of concerns around suicidal ideation. He experienced periods of homelessness and of living in hostels. He was known to misuse substances.

Making Safeguarding Personal

Duncan did not readily engage with offers of support. There is a repetitive cycle of hospital admissions, hostel accommodation, substance misuse, lack of compliance with medication. Duncan wished to live independently but his option was not pursued.

How well are we working with people who present multiple needs who find it difficult to engage?

- Are they not engaging with us or are we not engaging with them?
- How do we know the people we are working with?
- Is there sufficient focus on the impact of trauma and adverse experiences?

Terms of Reference : To consider

- Assessment and risk assessment
- Mental Capacity assessments (executive functioning)
- Responses to homelessness and temporary accommodation
- Agencies working together
- Information Sharing
- Responses to substance misuse
- Provision of Mental Health Services and support.

Lines of Enquiry:

- Responses to Mental Health
- Responses to substance misuse
- Staff support
- Working together and multi agency meetings
- Risk assessment
- Making Safeguarding Personal
- Street-based living and hostel provision

Safeguarding Adult Reviews – O1



O1 was a white British man who lived with his wife and his daughter who was known to mental health services. O1 had retired early to help care for his daughter. His wife described him as jolly, outgoing and optimistic but said he could also be short-tempered, aggressive and dependent on alcohol. O1 was the dominant person in the household; no-one in the family was prepared to challenge his views, especially around seeking help.

Concerns were raised in 2014 around self-neglect and hoarding. O1 was reluctant to engage and offers of support were declined. Four years later, a family member contacted Adult Social Care expressing concerns about the state of the home. Advice was given but the concern was not progressed and O1 remained on a waiting list.

In October 2018 O1 was admitted to hospital suffering from pressure ulcers and in a critical state. He was later discharged to a care home due to the state of the family home. In December 2018 O1 discharged himself from the care home and was not seen by agencies until early January 2019. He had been lying on the floor for several weeks and had significant pressure ulcers across multiple areas of his body. O1 was again admitted to hospital and recovered. He moved permanently to a nursing home and died in May 2020 aged 87.

The SAR noted lack of follow up when concerns were raised, missed opportunities for preventative work, risks not being considered.

Recommendations

- Improved understanding of safeguarding referral processes for GP practices and mental health staff.
- Safeguarding training, highlighting self-neglect, for hospital staff.
- Develop effective ICS governance around understanding safeguarding.
- Ensure clinicians know how to highlight safeguarding concerns.
- All agencies to review and audit safeguarding supervision arrangements.
- Professional Curiosity must be challenged and aired in supervision with time for critical reflection.
- Adult Social Care to: Improve internal communication between teams and external communication with other agencies; Improvements made following key changes implemented in ASC to be reviewed.
- Improved communications between and across all agencies to be audited by CSAB.
- GP registration to be better understood across agencies.
- Improvements to be made in commissioning guidance on discharge summaries and audit; also on commissioning guidance for care homes.
- Learning across agencies around risk and risk assessing practice and creation of a CSAB single risk management strategy.

Safeguarding Adult Reviews - Madeleine



Background

Madeleine was of mixed ethnicity (White British/Black Nigerian), she was 18 years old when she died and was well known to many services. She had a long history of mental health (CAMHS) support from a very young age, including being an inpatient when she was 9. At 16 her parents were told that CAMHS had 'tried everything' so they should ask for help from social care. Madeleine had a diagnosis of Autistic Spectrum Disorder, 'emotional dysregulation' and Obsessive-Compulsive Disorder. She had an education, Health and Care Plan but despite this had been excluded from schools because of her behaviour which was challenging. She was first assessed by social care services when she was 12 and at 16 she was taken into care. She experienced 8 different placements in 5 months and was then placed in secure accommodation in Scotland. Shortly before her 18th birthday she moved from there to an Independent Living placement in Croydon. Despite having reached adulthood, coordination of her care needs remained the responsibility of LB Wandsworth's Children's Social Care.

On the evening of the 13 August 2020, whilst at her placement, Madeleine took Ketamine. Staff called 111 for advice. A short time later, staff found her suspended from her door. She was taken to hospital and died on 16 August 2020.

Recommendations

- To review case files of young people with complex needs who require robust transition planning to protect them against harm. This must include information about how the voices of young people have been included within the care plans.
- To support practitioners in improving their legal literacy, particularly in relation to mental capacity for young people and knowledge about autism and how practitioners can make reasonable adjustments to services and care plans, in accordance with guidance and legislation.
- To improve multi-agency care planning for young people who transition into adult services and involve young people at every stage.
- To review protocols of oversight of young people with care and safety needs who are the responsibility of one local authority but placed in another.
- To provide more extensive information and guidance about the Transitional Safeguarding needs of care experienced by young people.

CSAB Priorities 2021/2022



CSAB Priorities 2021 - 2022

PREVENTION



What has been done

- The data shows a drop in contacts which become adult safeguarding concerns / referrals. This is a result in the changes in process. Croydon Adult Support team now screen all 'at risk contacts' to ensure they are appropriate for a safeguarding response. What we have found in the past is many such contacts are better dealt with outside the safeguarding process in a more supportive / preventative model which generally results in better outcomes for Croydon residents. This has a positive impact through the safeguarding system ensuring that the safeguarding process of S42 Enquires is focused on those people who would benefit from this intervention. This change in process has enabled a stronger focus on prevention.
- A central transformation team with a multi-agency group from health and the police established the new NHS 0300 process to enable officers to have up-to-date information and advice when dealing with mental health incidents. This gives greater confidence to officers dealing with incidents, greater knowledge and clearer decision making processes based on evidence from medical practitioners.
- A central transformation project has also been working to improve the police response to mental health incidents. The creation of a new digital process is due to go live in the next few weeks so that officers can share information to the mental health team for those in mental health crisis which reduces handover times and allows the medical team have the information in advance of the individual arriving.

What needs to be done

- Police to continue to work towards a fully embedded "one front door" approach for vulnerable adult enquiries. This builds on the successful one front door for children which has reduced delays and improved information sharing with our partners. This approach will encourage strategy discussions between police and partners and provide a central point of contact for partners.
- The dedicated mental health team will continue to work with high volume service users
- Police to continue training on mental health, wellbeing, neurodiversity and the anticipated changes as a result of the Liberty Protection Safeguards (LPS)
- Police continued focus on Violence Against Women and Girls (VAWG)
- Police continued focus on Serious Youth Violence
- Mind in Croydon would like to see further building on the training offer for delivery partners, improving front line staff members ability to pick up on safeguarding issues.
- Continue the work of the VOTP sub-group around awareness of how to report abuse as this is pivotal so residents act if they have concerns.

CSAB Priorities 2021 - 2022

PREVENTION



What has been done

- Police have continued to focus on serious youth violence which causes fear, ill-health and loss affecting individuals and communities.
- The continuation of the Crisis Assessment Team (CAT) care programme where health professionals and the police jointly respond to urgent crisis calls with the aim of reducing the need for Section 136 and ensuring early diversions and support are put in place.
- The designated nurse has been proactively involved in the Safe and Wellbeing Reviews Integrated Care System Oversight Review Panel. This was set up following the publication of SARs by Norfolk SAB [Joanna, Jon and Ben - published September 2021 | Norfolk Safeguarding Adults Board](#)
- Development of the LA Autism service, moving back to face-to-face work.
- SARs will always highlight the failings but there has been good work taking place between ASC and Mental Health and we need to keep this in mind.
- The Police created a local violence against women and girls plan to drive activity locally in line with the Metropolitan Police Strategy. This has included the creation of the Predatory Offender Unit who focus on arresting high harm domestic abuse suspects.



South West
London
Integrated
Care System

Integrated Care Systems [ICS] have four key purposes:

- Improving outcomes in population health and healthcare
- Tackling inequalities in outcomes, experience and access
- Enhancing productivity and value for money
- Supporting broader social and economic development

Croydon are part of the SWL ICS along with the boroughs of Sutton,

Background: Living Independently For Everyone (LIFE)

Both current and traditional ways of working need to change fundamentally if we want to further improve the health and wellbeing of the people of Croydon. Too many of our services are focussed on supporting those in crisis rather than preventing them getting to that point. One Croydon is developing transformational models of care so that we work to support people to stay well for longer.

LIFE

We have created a 'One team, One name, One resource' approach to the delivery of services through the LIFE service. LIFE is an integrated, community-based single team of staff drawn from across reablement, rehabilitation, intermediate care, health and social care professionals, clinicians, and colleagues from related community organisations within the 3rd Sector.

What we want to achieve:

Building on success of the LIFE service, we want to take our integration to the next level by having fully integrated teams between acute and community, integrated IT & financial systems and integrated leadership. We want to expand by creating 6 integrated teams in each locality to support people remain in the community (Integrated Community Networks ICN+)

ICN+ 151

ICN+ core team

A physical space in each locality for co-working and joint clinics

IT solutions for virtual MDT meetings and flexible working

Management of locality health and care budget

- Integrated manager
- Social workers
- Community Nursing
- Occupational Therapists
- Physiotherapists
- Pharmacist
- Network Facilitator
- Talking Therapist
- Mental Health Practitioners
- Live Well Service
- Community Builders
- GPs
- Geriatricians
- Personal Independent Co-ordinators

CSAB Priorities 2021 - 2022

COMMISSIONING



What has been done

- The Police continued to review all incidents involving vulnerable adults and care homes and consider a SAR referral when an adult dies or is seriously harmed as a result of suspected abuse or neglect and there is concern that partner agencies could have worked together more effectively to protect the adult.
- CHS appointed a DVA support worker to work alongside the IDVA and drive improvements with the management of domestic abuse in the Trust.
- Regular meetings with providers to give training and updates on policies/procedures were carried out by the Commissioning Team at the L.A. This was a new approach which started in 2020/21.
- Regular monthly report showing quality of provider provision in the borough. This is to help prioritise concerns and to focus areas of where improvements are to be made.

What needs to be done

- CSAB to be an active partner in the Integrated Care System and engage with partners at Place level.
- Provider Training to continue by the Commissioning Team and plan for this to expand in 2022/23.
- An action plan is to be developed as part of the Social Care Provider Strategy Group which will feedback into the Localities Board and CSAB which is from all partners.
- To have a full understanding of the quality of the market.
- To support the development and sustainability of providers especially around workforce recruitment and retention.
- Review of the Provider Concerns Policy which gives a framework to manage safeguarding enquiries in respect to Providers of social care.

CSAB Priorities 2021 - 2022

COMMISSIONING



What has been done

- Commissioning being a part of ASC ensuring a more integrated development of services and a response to safeguarding issues.
- New commissioning structure which will reflect client cohorts so relates to the needs of the Croydon resident. This has involved bringing staff together in one team to refocus on working with the market.
- The CSAB Intelligence Sharing sub group continue to have oversight of the provider market, high engagement from all agencies across the partnership.
- Championing what matters to you: Healthwatch Croydon Annual Report 2021 – 22. Croydon Healthwatch represented on the CSAB and sub groups. Link to full report: <https://www.healthwatchcroydon.co.uk/wp-content/uploads/2022/06/Championing-what-matters-to-you-Healthwatch-Croydon-Annual-Report-2021-22.pdf>



CSAB Priorities 2021 - 2022

Making Safeguarding Personal



What has been done

- A dedicated police mental health team continues to work with a cohort of high volume service users working with partners to reduce calls to service and ensure an effective tailored response.
- Established a new Risk and Demand team which provides a 24/7 investigation response for missing people within the early hours of the investigation. Officers are specially trained to identify and manage risk and work alongside our response teams to provide the most appropriate response . Enhanced supervision within the team ensures police use all resources and opportunities to protect and safeguard. [Police]
- Working in partnership with Ingram Court Youth Hostel, NHS SWL CCG hosted a health and wellbeing day for young people experiencing homelessness to reduce barriers to accessing health services.
- Reshaping of the LA safeguarding process ensuring that all referrals receive a measured and personalised response. Introducing an 'at risk' contact stage to see if there is a better way of managing the matter than going through the s42 process. Outcome has been to have a more balanced response with better outcomes.

What needs to be done

- Support Local Authority, NHS and other partners transition from DoLs to LPS . Ensuring it is a safe and effective process
- Have a robust transitional safeguarding process across the partnership.
- New provider networks for home care, over 65s and working age adults have been set up for 22/23.
- Engagement and support to the market is critical in ensuring excellent quality care. Over the next year we want to get the voice of the providers and residents into action plans to support this around improved use of technology, workforce and voice of the resident.
- To continue to work together to ensure what is referred as a safeguarding issue is appropriate.
- Work across the partnership on the transition from DoLs to LPS when implemented.
- Review of the Self Neglect Policy.

CSAB Priorities 2021 - 2022



QUALITY & IMPROVEMENT

What has been done

- Learning from Safeguarding Adult Reports cascaded throughout the Police. Lessons learnt are shared to maximise the opportunity to better safeguard adults with care and support needs, who are or may be at risk of abuse or neglect.
- The Police continued to deliver internal training and events to our staff focused on mental health, wellbeing and neurodiversity to increase knowledge and share best practice.
- The Police continued focus on providing support and advice to investigating officers to improve their knowledge around mental health and access to partner leads.
- Restructure of the Quality & Market Support Team at the L.A., this team has total responsibility for the quality of the market and is now one centralised team: 1 Quality & Market Support Manager and 5 Care Quality Officers.
- Better use and understanding of the new LA Liquid Logic system – seeing more accurate recording and data quality leading to more robust data to support future planning and to support the changes to the process as outlined above.

What needs to be done

- Health to support Adult Social Care to strengthen the process to provide referrers feedback on the outcomes of safeguarding concerns.
- CSAB to embed the statutory guidance, agree a framework for the People in Position of Trust (PiPoT) process and communicate this with all relevant partners.
- CSAB to be sighted on the potential changes in children safeguarding from the independent review May 2022 and assess areas of learning for adult safeguarding.
- While the new Quality & Market Support team are in place, they do not yet have full oversight in monitoring all care providers. The team will come up with a full monitoring plan by the end of July 2022 to show how all provision can be monitored.
- Out of Borough placements was an action for improvement in 21/22 by commissioning, they are now looking to introduce a system of regular check ins with local authorities at the start of Quarter 3.

CSAB Priorities 2021 - 2022

QUALITY & IMPROVEMENT



What has been done

- CHS hosted a domestic abuse conference and key speakers included the NHSE Safeguarding Lead and representative from the Domestic Abuse Commissioner's Office.
- The stability of ASC coming out of the pandemic: DASS appointed, reshaping of disability service for a more localised response, continued development of integrated localised multi-disciplinary services in older people and the reduction of the DoLs waiting list.
- There has been a positive change in who Safeguarding Adult Review requests are submitted by, these are now being received from across the partnership.
- ASC data is more accurate and is telling us that we are focusing on the right areas – fewer concerns but more enquiries.
- Presentation given to the CSAB members by the S42 team outlining the referral process and providing case examples. This was rolled out to the GP Forum, Health colleagues and to the London Lived Experience Group.

What needs to be done

- More focus required on homelessness, workshop planned for October 2022 following recommendations from the 'Duncan' SAR.
- Work on transitions is underway however, to continue this work and the development of the Transition Service.
- To continue the on-going re-shaping of the ASC safeguarding processes.
- Continue to work on the dashboard with colleagues who work with data collection such as Public Health, FJC and what are the overlaps between the CSCP and the CSAB.
- Identify the good practice and how can we share that learning widely.
- Refresh the current Training & Improvement sub-group beginning with the Terms of Reference and the name of the group. Group to focus on knowing what training is out there and translating SAR outcomes into training.

CSAB Priorities 2021 - 2022

VOICE OF THE PEOPLE



What has been done

- Members of the VOTP sub group have presented 'Keeping you Safe' to forums and groups in Croydon. These have included provider forums, Care Home Managers, Dom Care Forum, BME Forum with further events being planned.
- List collated of groups to engage including updates on where the VOTP/CSAB team reps have presented. This has proved a helpful document.
- S42 presented the work they are doing around the Service User feedback questionnaire with the aim to receive feedback.
- Keeping you Safe leaflet – this has moved forward with the development of a consent form to obtain photos and quotes for the leaflet from residents with visits planned to obtain photos.
- Chair of the VOTP being an active member of the London Lived Experience Group bringing information back for the CSAB and also sharing Croydon's work with the London wide group.

What needs to be done

- CSAB and VOTP members to attend and share the work of the board and group to the Selsdon and Sanderstead Rotary, Asian Resource Centre, HearUs, and Councillor meeting.
- On 20th July 2022 a visit to the Memory Café in Thornton Heath has been organised with the aim to also, with consent, to take photos for the Keeping You Safe leaflet.
- A need to continue to tidy up governance around SARs with the review of the framework alongside the regional SAR Protocol work.
- Working together across the partnership for adult safeguarding to get parity with children's safeguarding using the opportunity of the ICNs.
- Learn more from the work planned to be undertaken around Hard to Engage with the need to upskill the workforce around engagement.

CSAB Priorities 2021 - 2022



Communication & Engagement

New Service – Mental Health Personal Independence Co-ordinator Service [MHPIC]: Croydon BME Forum and Mind in Croydon have formed an exciting new partnership. The MHPIC Service offers one to one support for people with a serious mental health illness. It will focus on what matters most to people and to see how best we can support in arrears such as managing their mental health.

The Recovery Space is now fully rolled out and adopted, essentially this is a Crisis Café and offers a safe, non-clinical, supportive environment for people experiencing a social mental health crisis from 6.00 – 11.00 pm 7 days a week in East Croydon. This acts as an alternative to using other crisis services.

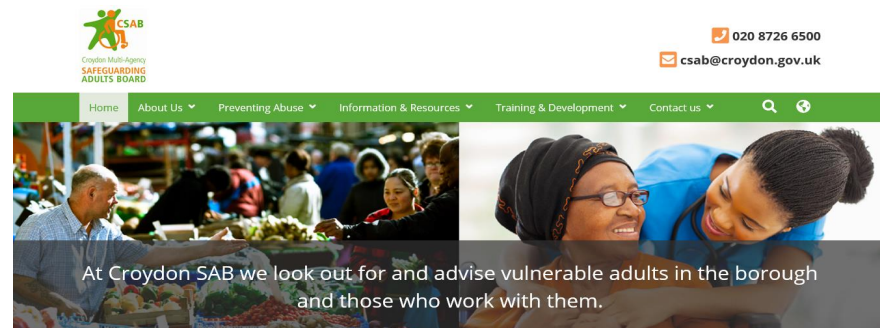


Crisis Support workers seek to:

- Manage crisis
- Identify triggers
- Identify strengths & coping methods
- Explore self-help tools and apps
- Improve your self-confidence, esteem and independence
- Develop personalised wellbeing tool kit.

The CHWS is a new service and opened in January 2022. It provides MH and Wellbeing support and services for Croydon's residents. It also includes finance, housing, education, training & employment and social inclusion. It provides access to support including clinical, and advice and information for people to overcome barriers to manager their MH and independence.

People can self-present at the Space, without a need for referral, or alternatively, can be formally referred by the Central Croydon Mental Health clinical teams. Support includes help in looking after your health and wellbeing when you are in a time of crisis.



CSAB Priorities 2021 - 2022

COMMUNICATION & ENGAGEMENT



What has been done

- The CSAB has excellent engagement across the partnership and this is evidenced by the attendance at both the Board meetings and sub groups. Partners are represented across all agencies and with partners keen to take on the roles of Chair and Vice Chair of the sub groups.
- Strong links made with other SABs in London with increased engagement with both national and London networks, this enables the CSAB to share information developed in Croydon and to learn from other SABs.
- We have developed a list of contacts for SAR authors which is growing with more authors expressing an interest to undertake commissioned SARs.

What needs to be done

- Making the public more aware of what is already out there for them to access.
- The use of simple language around Domestic Abuse and Domestic Violence – including the awareness of the different forms of abuse and promotion around the language.
- Following the CSAB Development Day to refresh the three year Strategic Plan in line with the new priorities.
- Look to appoint a second Lay Member to the membership of the CSAB.



020 8726 6500

csab@croydon.gov.uk

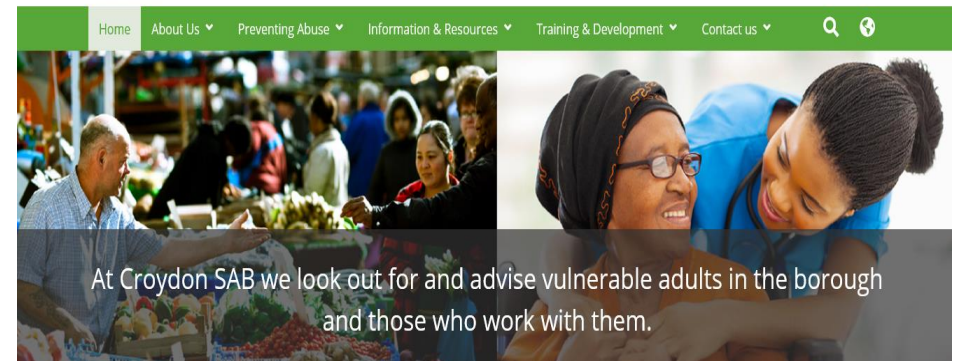
FJC

Care and support in Croydon for those experiencing domestic abuse

You can make an appointment by contacting us on: **020 8688 0100**

We are open Monday, Wednesday, and Friday, 9am-5pm and Tuesday, Thursday 8am-7pm.

CROYDON
www.croydon.gov.uk



CSAB Priorities 2021 - 2022

COMMUNICATION & ENGAGEMENT



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Home About Us Preventing Abuse Information & Resources Training & Development Contact us

At Croydon SAB we look out for and advise vulnerable adults in the borough and those who work with them.

ANNUAL REPORT 2021 2022

CROYDON SME FORUM

www.Cbmeforum.org

Development Day – 23 February 2022



The focus and outcomes for the day was to:

- Review the relevance of the 3-year strategic plan in a changed Croydon.
- Reflect on the impact of world events over the past 20 months
- Reset the SAB's focus in light of our experience
- Refresh the SAB working together culture
- Revise the SAB priorities to represent the needs of the Croydon residents
- Require commitment from all SAB members

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Priorities for 2022/23 were discussed and agreed as follows:

- **Prevention**
- **Commissioning**
- **Quality and Improvement**
- **Cross sector working** – transition between children and adults, link with CSP and to include the locality developments across these to support safeguarding.

Prevention, Commissioning and Quality & Improvement remains with a new priority of Cross Sector Work.

Making Safeguarding Personal to become a common thread through sub-groups along with Voice of the Croydon resident and Communication & Engagement.

It was agreed there is still work to be done by the sub-groups however, the group members are very much engaged with the work of the CSAB and this forms a solid sub-group foundations with absolute commitment to move forward.

Governance & Accountability arrangements

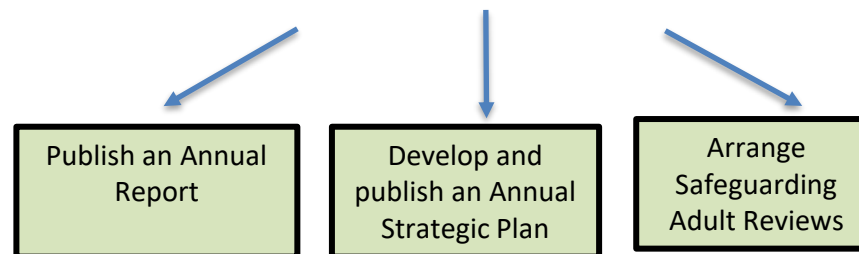


Care Act 2014

SAB Membership
includes:
Local Statutory &
voluntary sector
organisation and a
Lay Member.
Chaired by an
Independent Chair

**Safeguarding Adult Board
[SAB]**
Statutory Partners are:
Local Authority, Police, Clinical
Commissioning Group

Core duties of the SAB



The SAB will embed the requirements of the overarching Care Act to:

**Assure that local safeguarding
arrangements are in place as defined by
the Act and working well across all relevant
agencies**

**Prevent abuse
and neglect
where possible**

**Provide timely and proportionate
responses when abuse or neglect
is likely or has occurred**

Six Safeguarding Principles



The national guidance says that six principles should guide all safeguarding adults work

Empowerment

Talk to me, hear my voice

Protection

Work with me to support me to be safe

Prevention

Support me to be safe now and in the future

Proportionality

Work with me, to resolve my concerns and let me move on with my life

Partnership

Work together with me

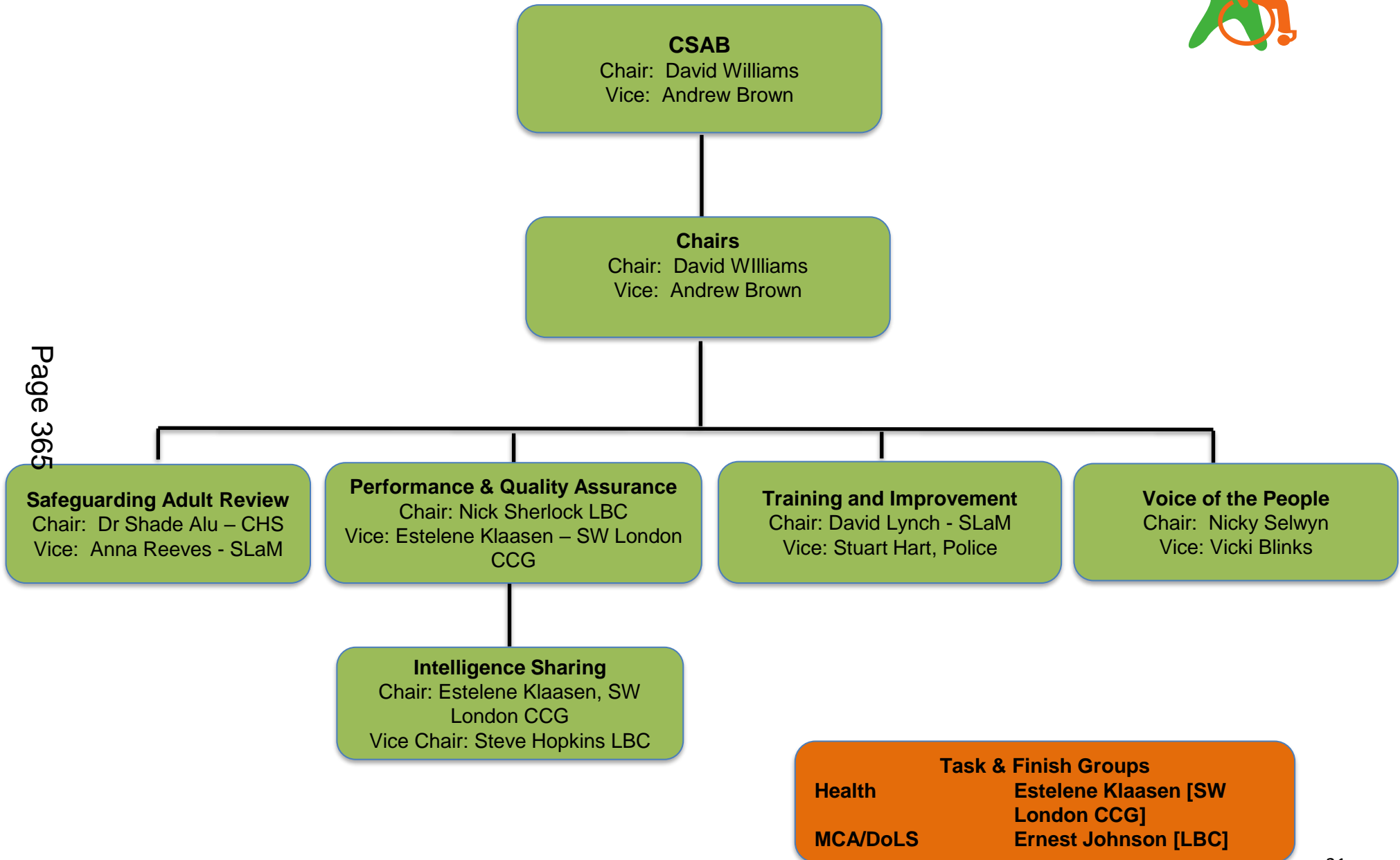
Accountability

Work with me, know you have done all you should

CSAB Structure



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CSAB Structure



All sub groups will have a Chair & Vice Chair agreed by the Board to ensure governance and accountability. Each Sub group develops a work plan reporting to the board on progress against the strategic priorities and this will inform the Safeguarding Annual Report. The Health and MCA Task & Finish Groups undertake specific projects as and when required.

Chairs Sub Group

The Chairs monitor and review the CSAB Strategic Plan progress and priorities. Have oversight of the Board's work through its sub groups.

Performance & Quality Assurance

Working together to oversee, support and monitor the quality of care across the partnership in order that safeguarding standards keep people safe and minimise risk.

Safeguarding Adult Review

Considers requests which may meet the statutory criteria, to make arrangements for and oversee all SARs ensuring recommendations are made, messages are disseminated and lessons learned.

Training & Improvement

To explore and implement the training and learning needs of partners in order to deliver a co-ordinated training programme. It will be focussed on improving the outcomes for adults at risk in Croydon, have oversight of training and identify gaps and duplication.

Voice of the People

Support a person centred approach and focus on demographic groups which are under represented in safeguarding data. Raise awareness of safeguarding and what it means to the resident with the voice of the resident heard and acted on.

Intelligence Sharing

Support the CSAB with regards to prevention by managing the provider market through frequent market oversight. It allows colleagues from all aspects of health and social care to share good practice and concerns.



Funding arrangements for the CSAB

The Safeguarding Board is jointly financed by contributions from partner agencies and it is acknowledged that organisations give their time and resources to support the functioning of the board. The Board has again successfully managed a balanced budget, despite there being no increase in member contributions.

Income 2021/2022

£15,000 South London & Maudsley

£21,670 Clinical Commissioning Group

£21,670 Croydon Health Services

£101,928 London Borough of Croydon

£5,000 Met Police

0 London Fire Brigade

Total £165,268

2021/2022 Expenditure:

£126,899 Staffing

£239 IT Equipment

£864 Website design & support

£1,975 Training

£35,291 SARs [includes SAR legal costs]
 Reserves have been carried over and the budget for 2021/22 proposes to utilise some of the reserves for future SARs as the national/local picture shows a trend of commissioning SARs is increasing.

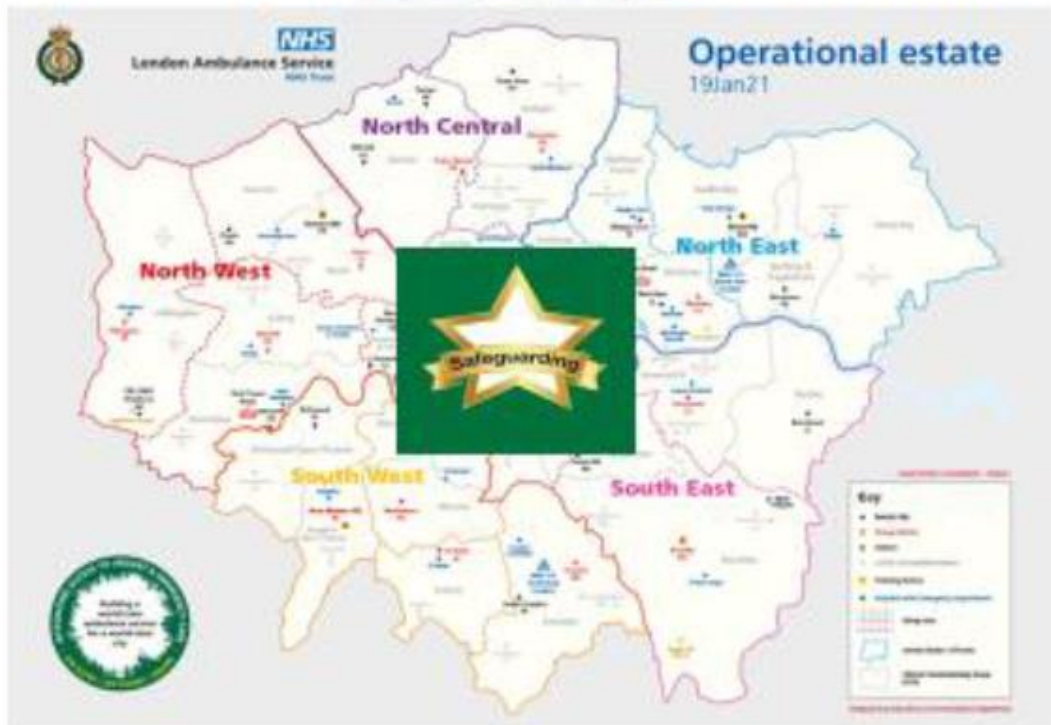
Total £165,268



London Ambulance Service
NHS Trust



Safeguarding Annual Report 2021 – 2022



<https://www.croydonsab.co.uk/information-resources/>

Click here for full report

Glossary



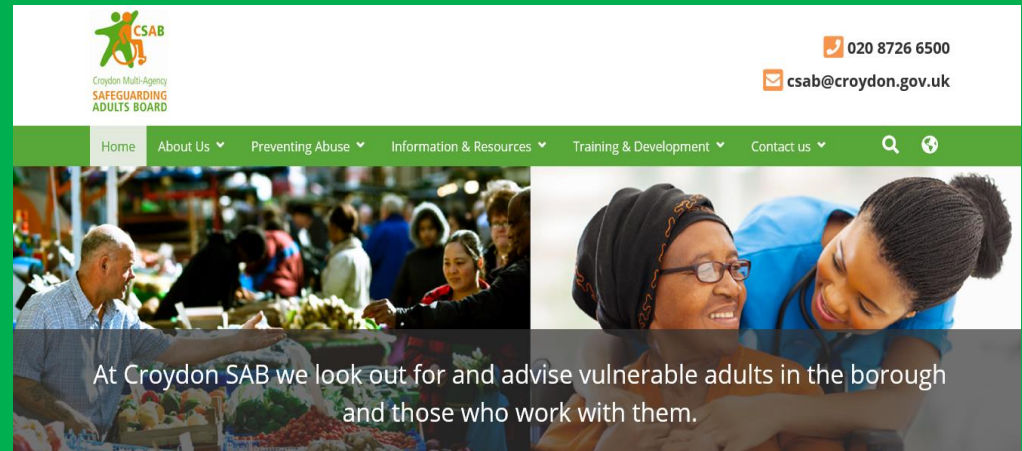
ADASS	Association of Directors of Adult Social Services	MCA	Mental Capacity Act
ASC	Adult Social Services	MSP	Making Safeguarding Personal
BME	Black and Minority Ethnic	MASH	Multi agency Safeguarding Hub
CCG	Clinical Commissioning Groups	MPS	Metropolitan Police Service
CHS/ CUH	Croydon Health Services/Croydon University Hospital	NHSE	National Health Service England
CSAB	Croydon Safeguarding Adult Board	PIC	Personal Independence Coordinator
CQC	Care Quality Commission	SAR	Safeguarding Adult Review
DoLS	Deprivation of Liberty Safeguards	SAPAT	Safeguarding Adult Partnership Audit Tool
DWP	Department of Working Pensions	SLaM	South London & Maudsley NHS Foundation Trust
HMPP	Her Majesty's Prisons and Probation	SI	Serious Incident
ICN+	Integrated Community Networks Plus	VOTP	Voice of the People
IRIS	The Identification & Referral to Improve Safety	DASS	Director of Adult Social Services
LD	Learning Disabilities	LPS	Liberty Protection Safeguard
LFB	London Fire Brigade [Croydon]	CHWS	The Croydon Health and Wellbeing Space
LAS	London Ambulance Service	MHPIC	Mental Health Personal Independence Co-Ordinator Service
LGA	Local Government Association		

How to contact the CSAB

Denise Snow, Board Manager
Denise.snow@croydon.gov.uk

Lesley Weakford, CSAB Co-ordinator
Lesley.Weakford@croydon.gov.uk

or csab@croydon.gov.uk



<https://www.croydonsab.co.uk/>

REPORT TO:	CABINET 16 November 2022
SUBJECT:	Waste Collection and Street Cleaning Contract (Veolia)
LEAD OFFICER:	<i>Nick Hibberd, Corporate Director of Sustainable Communities, Regeneration and Economic Recovery</i> <i>Steve Iles Director of Sustainable Communities</i>
CABINET MEMBER:	Cllr Scott Roche - Cabinet Member Streets & Environment
WARDS:	All

SUMMARY OF REPORT:

The purpose of the report requests approval by Cabinet **not** to extend the current waste and street cleansing contract with Veolia, following a review of the proposed requirements by the contractor to support an extension.

Croydon Council operates waste and recycling services for every household in the borough through its contract with Veolia. This contract includes waste and recycling collections, footway winter maintenance, vehicle maintenance and street cleaning. It was procured by Croydon on behalf of the four partner boroughs in the South London Waste Partnership. The contract commenced in April 2017 and the initial eight-year term expires on 31st March 2025. The partnership boroughs have the option to extend the contract for another eight years or to consider another option for service delivery. Any extension must be agreed by all parties.

This report presents the council's approach to reshape the future of the waste collection and street cleansing services, which is the fulfilment of a key Manifesto commitment set out by the Executive Mayor.

The re-procurement is necessary due to legal risk regarding Veolia's proposed conditions for extending the existing contract. A new commissioning approach will also allow the council to improve the waste collection and street cleansing arrangements and contract management, help the local environmental quality and reduce fly tipping whilst helping increase pride in Croydon.

FINANCIAL IMPACT:

The combined annual value of the Phase C contract is £30m and the contract continues to be held and administered by Croydon Council on behalf of the South London Waste Partnership boroughs (Croydon, Kingston, Merton & Sutton).

Financial impacts arising from the recommendations of this report are:

There is a need to provide funding for the recommissioning funding within 23/24 & 24/25. As part of the budget setting process for 23/24 budget needs

to be allocated in the Sustainable Communities revenue budget for the delivery of the recommissioning strategy.

- The cost in future years (post 2025) service provision will need to be the subject of a growth bid as part of 2024/25 budget setting.

KEY DECISION REFERENCE NO.: 6822EM

1. RECOMMENDATIONS:

For the reasons set out in the report and its appendices, the Executive Mayor in Cabinet is recommended to:

- 1.1. Agree that the current waste collection and street cleansing contract with Veolia Environment Services is not extended following expiry of the initial term on 31st March 2025
- 1.2. Agree that further work to consider the alternative options for the provision of waste collection and street cleansing services is undertaken and recommendations brought before Cabinet in line with the timetable set out as section 6.7 of this report.
- 1.3. Note the powers held by the Mayor of London under the GLA Act to issue directions to London boroughs in relation to waste management procurement and that the project team will be encouraged to develop a close working relationship with the GLA borough liaison team to ensure they are well-sighted on the steps being taken to ensure service continuity and continuing conformity with the London Environment Strategy.

2. BACKGROUND

- 2.1 The South London Waste Partnership (SLWP) was formed in 2003 between the boroughs of Croydon, Kingston, Merton, and Sutton and has a proven record of providing improved and more cost-effective waste management services through the procurement of complex waste disposal treatment, recycling and Household Reuse and Recycling Centre contracts. The SLWP itself is not a legal entity and thus procures its contracts through one of the borough members of the Partnership in this case, Croydon Council.
- 2.2 In 2017 the SLWP procured the Phase C - Contract for waste and recycle collection and marketing, winter maintenance, vehicle maintenance and street cleaning (Lot 1) on behalf of its four borough partners. The contract was awarded to Veolia (Environmental Services). The new contract saw all boroughs adopting the same collection methodology, fortnightly residual waste collection, fortnightly paper/card collection, fortnightly dry mixed recyclable collection (glass, cans, plastic), weekly food waste and a charged for fortnightly garden waste

service. Some differences remain in response to localised needs and demands, such as flats above shops, communal properties, street cleansing and so on. Other areas, such as winter maintenance, are also services that are not provided to all boroughs under the Phase C Contract.

- 2.3 The service resulted in all the SLWP Boroughs being within the top 7 recycling performers of the 33 London Boroughs and delivered significant collection and disposal savings.
- 2.4 The current contract, also referred to as 'Phase C', was procured by Croydon on behalf of the SLWP partner boroughs as lead and awarded to Veolia (Environmental Services). The initial term of the Phase C Contract is 8 years with an expiration date of 31st March 2025. Any extension must be agreed by both parties to the contract. Croydon as lead and the other SLWP partner boroughs entered into an Inter Authority Agreement (IAA) to manage the relationship between the partners in respect of the Contract.
- 2.5 The annual value of the Phase C Contract across the SLWP is c £30m and the contract continues to be held and administered by Croydon. The council specific annualised costs are outlined in the Appendix (Part B).

3. CURRENT SERVICE PROVISION

- 3.1 The Council's waste collection, street cleaning and winter maintenance services are currently contracted to Veolia. This decision was taken by the Council in 2016 (Key Decision Number 20/16/CAB) to deliver financial savings, increase recycling performance, maintain satisfaction, and provide over one million residents with a kerbside recycling service. The contract commenced on 1 April 2017 for an eight-year initial term, with the option to extend for a further two periods, each of eight years.
- 3.2 The contract at its inception saw all boroughs adopting the same collection methodology for the core areas of the services, including fortnightly residual waste collection, fortnightly paper/card collection, fortnightly dry mixed recyclable collection (glass, cans, plastic), weekly food waste, a charged fortnightly garden waste service and commercial waste. Some differences remain in response to localised needs and demands, such as flats above shops, communal properties, street cleansing and so on. Other areas, such as winter maintenance, are also services that are not provided to all boroughs under the Phase C Contract.
- 3.3 The existing contract includes the following services:
 - Collection of residual, recycling, food, and green waste
 - Commercial waste collection/disposal
 - Clinical waste collections
 - Gully maintenance

- Winter maintenance
 - Street cleansing
 - Waste transfer station operation (at Garth Road in Merton and Stubbs Mead in Croydon)
 - Recycling receipt, bulking and haulage
 - Processing of recyclates
 - Bulky waste collection and treatment
 - Vehicle maintenance
 - Communications
- 3.4 Infrastructure – Both Croydon and Sutton’s collection services currently operate from the Stubbs Mead Depot in Croydon.
- 3.5 The Council need to provide best value, increase recycling performance, drive waste minimisation, improve resident satisfaction in waste collection and street cleansing services, respond to the challenges arising from new legislation and Government waste consultations on the implementation of this legislation, and also to reduce the carbon impact of these services. This cannot be achieved without change. The following provides further detail around the challenges identified and how each feed into and supports the recommendations contained within the report.
- 3.6 It is recommended that Croydon develops and manages its own Service Delivery Strategy for the waste collection and street cleansing services currently delivered under the Phase C Contract while maintaining a coordinated timetable with partner boroughs. Four commissioning strategies would be involved - the Council’s in addition to those of the three partner boroughs.

4. LEGISLATIVE DRIVERS

- 4.1 The Environment Act 2021 is a key piece of legislation for delivering the commitments made in the 2018 Government’s 25 Year Environment Plan to ‘protect and improve the natural environment in the UK’, and for taking forward and legislating the measures and proposals outlined in the Resource and Waste Strategy (2018). The detail of the policy changes is still not fully known but the following are expected to impact the Council’s services in the next five years:
- **Consistency in Collection** - this requires the Council to collect in a segregated way a series of core materials: plastic, glass, paper/card, metal, and food waste. With the exception of flats above shops which do not have a food waste service, the Council already does this.
 - **Deposit Return Scheme** will add a small charge for the packaging of an item (such as a bottle), which is refunded when the item is recycled via a dedicated recycling scheme (usually in a shop).

- **Extended Producer Responsibility** - this is the Government's approach to move the full cost of collecting household waste from the taxpayer to producers. Fees are based on the recyclability of products and the approach aims to ensure greater quantities of recyclable waste are reprocessed into valuable, high quality secondary resources.
 - **Plastic Packaging Tax 2022** introduced a charge on producers for any plastic packaging that does not contain at least 30% recycled plastic content.
- 4.2 These proposals will have an impact on the quantities and value of recycling the Council collects, potentially as much as a 50 to 70% reduction in materials collected. This will impact the cost of running services.
- 4.3 The waste services the council runs must be in "general conformity" with the Mayor of London's London Environment Strategy 2018, which also requires the Council to have a Waste Reduction and Recycling Action Plan. Croydon is already achieving 38.72% recycling rate and the Mayor's targets for 2025 are for 50% recycling rate. The council trend is mirroring the national trend of a reduction in waste tonnage and consequently this is seeing a reduction in the percentage of recyclable waste being diverted from the general waste stream. Croydon's recycling rates for 21/22 remains in the top quartile for London. Croydon is also diverting 100% of waste from landfill.

5. CARBON NEUTRALITY

- 5.1 Climate change is the single most important challenge facing us all. Our response to the climate emergency will form a key element of the Council's focus, with cross-cutting and pan-departmental themes that align with each of our key objectives.
- 5.2 The Council declared a climate change and ecological emergency in July 2019 and Cabinet agreed that the Council would become carbon neutral by 2030. The council also agreed a Carbon Neutral Action Plan in February 2022.
- 5.3 Local Council recognises that the Climate Emergency is a significant threat to our planet and accepts that it needs to both act and provide leadership at the local level to mitigate the effects of this global crisis. It is also the Council's ambition to play a key leadership and influencer role at both a regional and national level to ensure that policies are in place to deliver meaningful action at the scale and pace that is required.
- 5.4 Achieving decarbonisation in the waste service will require looking at the

carbon emissions of every part of the waste journey - from material production to disposal routes.

- 5.5 It is likely to mean changes in the design, funding and operation of services and will require innovation from the market and technological solutions. For example, new and evolving vehicle and equipment technology,

6. THE FUTURE SHAPE OF WASTE SERVICES IN THE BOROUGH

Options from 2025

- 6.1 Council (through the shared South London Waste Partnership contract) and Veolia may extend the current contract period for two further periods from 2025, each being up to eight years. There is provision to revise the annual contract price if making the decision to extend. The decision to extend or recommission services needs to be made in a timely manner, despite the services not commencing until 2025, due to lead-in times for mobilisation. A Notification of a Wish to Discuss Extension was issued to Veolia on behalf of all four boroughs by Croydon as the procuring authority in September 2020.
- 6.2 The Council has used this as an opportunity to review the current service offer and operations with Veolia, and to start assessing the impact on costs for future services. This includes looking at the borough's ambition to deliver a zero-carbon waste service, future demand for waste services, changes in the industry and what the private market looks like. The Council will need to consider how resident satisfaction with waste collection and street cleansing services is not affected by necessary changes arising from new legislation and its implementation.
- 6.3 The contractor "Veolia" has set out its proposal to the Council for extending the contract. This proposal would see an increase in cost for the services being delivered on an 'as is' basis.
- 6.4 Legal advice has been sought regarding whether such an extension with Veolia would be compliant within the terms of the Regulation 72 modifications allowed under the Public Contract Regulations 2015. Having considered legal view, together with the opportunity to review the service offer and prepare for future legislative changes, the South London Waste Partnership has advised the partner Councils not to extend the contract with Veolia. This is because an extension would require contract variations that are likely to be considered substantial, which could leave the Council open to legal challenge.
- 6.5 In order to inform an assessment on the extension proposal from Veolia, a high-level assessment of the costs, advantages, and disadvantages of differing service delivery options the SLWP undertook a detailed Options appraisal on the recommissioning of the Phase C services on a 'like for

like' basis – with all the current Phase C services packaged up and analysed for re-procurement using the same specification.

These options were.

- to extend with Veolia.
- to reprocure the service.
- to bring the service operations back in house; and
- to deliver services through a Local Authority Trading Company model.

6.6 The results of the analysis did not provide a clear 'best-route' to market for a 'like for like' delivery of the current integrated waste collection and street cleansing contract.

6.7 Therefore, the council will need to assess options available considering the legal commentary and present a recommendation on the future delivery model and commissioning approach in line with the timetable set out below.

Commissioning timetable	
16 November 2022	Cabinet (this report) decision on whether to extend the current contract with Veolia
September 2022 to April 2023 (ongoing)	<ul style="list-style-type: none"> - Development of the scope of service and specification, soft market testing and options appraisals for the future of waste and street cleansing services to inform the work set out in paragraph 8. - Undertake Member engagement - Resident engagement - Cross cutting workshops with key internal stakeholders - Development of the procurement strategy report
March 2023	<p>Cabinet</p> <p>An update on the work undertaken soft market testing together with indicative costs and a recommendation on the commissioning model and procurement strategy for waste services.</p>
April 2023	Based on recommendations and member decisions, work commences on commissioning of services - whether reprocure, bringing back in house or development of a local authority trading company. If new procurement, Contract Notices issued.
During 2024	<p>Cabinet</p> <p>To provide an update on commissioning progress and updates on costs. If new procurement, recommendations for the award of contract(s) followed by mobilisation.</p>
April 2025	Service commencement and go-live

7. CONSULTATION - CONSULTATIONS UNDERTAKEN OR PROPOSED

- 7.1 There are multiple external and internal stakeholders.
- 7.2 **The Mayor of London** - has significant rights and powers conferred by s353-361 of the Greater London Authority Act. The Council has a duty to give the Mayor of London's two years' notice of the expiry of any waste management contract (this has been done). The Mayor of London has a right to be consulted on any arrangements proposed to re-procure or otherwise replace a contract, with a view to ensuring that the arrangements made would remain in general conformity with the Mayor of London's Environment Strategy.
- 7.3 Should a decision be made to re-procure the services, the local authority must give the Mayor of London at least 56 days' notice of any intention to place a Prior Information Notice on its buyer profile, or 108 days of any intention to place a Contract Notice.
- 7.4 The Mayor of London could issue a direction to the local authority in the event that a contract was perceived not to be in general conformity with London Environment Strategy.
- 7.5 **Member consultations** – this will be undertaken to review current service delivery challenges, agree future service objectives and identify changes in future service delivery.
- 7.6 **Residents' engagement** - this will be able to help shape services during the latter part of 2022. The Council will work with the South London Waste Partnership and neighbouring partner boroughs to undertake an online survey open to all residents and some dedicated focus groups looking at parts of the service where there are challenges, such as, communal collection properties, councils housing estates and flats above shops. We will engage with the Tenant and Leaseholder Panel, and the borough's Resident Associations.
- 7.7 **SLWP Triennial Survey** - In addition to this the SLWP will also undertake the Triennial resident survey. The SLWP triennial survey is a reflective, closed, invite-only consultation limited to just over 1,000 residents across the SLWP region. The survey is conducted by an independent social research company and has taken place every three years since 2010. This is a regular survey undertaken by the SLWP and the results from this year's survey will be used to support the delivery of the SLWP 2022/23 work programme and inform the development of the Joint Waste Strategy and the next Communications Strategy for 2023-2026. The survey is already underway and will take place from November 2022 and the results will be available in January 2023. The results from these survey's will be used to inform and support the work looking at the future of the waste services.

8. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 8.1 As a key Mayoral pledge, we are committed to tackling the ‘broken window effect’ to improve the quality and appearance of the street space environment, to encourage investment and tackle low-level anti-social behaviour.
- 8.2 **Options considered and rejected.** As set out in section 6.5 above the SLWP undertook a detailed Options appraisal on the recommissioning of the Phase C services on a like for like basis – that being all the current Phase C services being packaged up and re-procured using the same specification. The results of the analysis did not provide a clear ‘best-route’ to market for a ‘like for like’ delivery of the current integrated collection and cleansing contract. The Appendix – “Part B” Extension cost financial summary report” sets out the full options appraisal and recommendations.
- 8.3 Until the work to consider alternative options for the provision of waste services is completed, it is not possible to set out which commissioning approach would be most suitable. However, because of the high value, any option that involves putting a new contract in place - either for Croydon alone or in partnership with another member of the South London Waste Partnership - will need a competition following one of the prescribed processes set out in the Public Contracts Regulations 2015.
- 8.4 If a new procurement is required, it will be important to begin no later than April 2023 to allow enough time to advertise the procurement, give bidders at least the statutory time to respond, evaluate bids and build in the governance steps and the required ten-day standstill period after the notification of preferred bidder. This would need to be completed to leave enough time for contract completion and implementation of a new service.
- 8.5 As part of the next phase, the Council will consider how the procurement strategy and service model can generate the best social value outcomes for the borough. This may include supporting the local economy and supply chain and creating opportunities for skills and employment.

9. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

Revenue and Capital consequences of report recommendations

- 9.1 The combined annual value of the Phase C contract is £30m and the contract continues to be held and administered by Croydon Council on behalf of the South London Waste Partnership boroughs (Croydon, Kingston, Merton & Sutton).
- 9.2 There is a need to provide funding for the recommissioning funding within 23/24 & 24/25. As part of the budget setting process for 23/24

budget needs to be allocated in the Sustainable Communities revenue budget for the delivery of the recommissioning strategy.

- 9.3 Subject The cost in future years (post 2025) service provision will need to be the subject of a growth bid as part of 2024/25 budget setting.

The effect of the decision

- 9.4 Extending the waste services contract with Veolia would mean an increase in the current contract costs. Initial assessments carried out to identify different options of providing the service have also suggested similar increases in the contract costs. Appropriate provision for these potential increases in costs will be included within the Council's Medium Term Financial Strategy.
- 9.5 Further options appraisal work along with surveys and soft market testing will be carried out to consider all the different options for the future of the waste and street cleaning services which are set out in paragraph 2.23 with a view to recommend the option which will provide the best value for money and flexibility to the Council. The costs for carrying out these assessments will be managed within the revenue budgets available to the Sustainable Communities service area and will be closely monitored as part of the regular budget monitoring process.
- 9.6 Depending on which option is chosen there may be a requirement for capital investment to set up the infrastructure needed to deliver the service along with the decarbonisation of the vehicle fleet.
- 9.7 Waste policies may need to be reviewed along with fees and charges within the service to identify the potential to mitigate the costs associated with the recommissioning of the waste and street cleansing services and any future legislative changes.

Risks

- 9.8 Whilst the current contract does not end until 31st March 2025 and the councils will continue to monitor the performance of the current contractor there is a risk as we approach the end of the contract term service performance could reduce.
- 9.9 The options appraisal works costing more than the budgets available. This risk will be managed via regular budget monitoring meetings where the costs and forecasts will be reviewed for accuracy and robustness. Underspends in other budgets within the service area may also be used to mitigate any potential budgetary pressures.
- 9.10 The contract costs being higher than estimated. The risk will be reduced by the fact that different options for the service delivery are being evaluated in order to find the one providing the most value for money. Other mitigating actions would be looking to partner with neighbouring

boroughs to recommission the service in order to achieve economies of scale, initiatives to reduce waste and review of fees and charges.

- 9.11 Reduced market - the number of contractors operating in the Municipal Sector has fallen in recent years which is reducing competition in the market. Procurements may often have only two or three bidders. Attitudes to risk have dramatically changed with bidders challenging all aspects of risk allocation and adding price premiums on any risks that remain.
- 9.12 Market capacity - In terms of other London waste collection contracts finishing in the next couple of years, The London Borough of Wandsworth's contract is due to expire at the end of March 2024, Westminster's contract is due to expire in September 2024, Camden is due to expire April 2025 (although has eight year extension option with the current provider Veolia) and Haringey is due to expire in April 2025 (although this also has a seven year contract extension option with the current provider) thus there will be an active market.

10. FUTURE SAVINGS/EFFICIENCIES

- 10.1 At present there are no future savings or efficiencies associated with this report, but cabinet are asked to note that there is a likely increase in the running of this service once commissioned as a result of market volatility and the global economic crisis.

Approved by: Darrell Jones Acting Head of Finance – Sustainable Communities, Regeneration & Economic Recovery

11. LEGAL CONSIDERATIONS

- 11.1 Local authorities have legal duties with regards the collection of waste, the disposal of waste and to keep Highways and public lands clear of litter under the Environmental Protection Act 1990. The contract with Veolia currently satisfies those statutory duties.
- 11.2 The contract with Veolia states that parties may extend for a further eight years by reaching agreement in writing no later than 42 months prior to the end of the contract period. It is understood that Veolia has agreed to amend this deadline to the end of December 2022. It is also understood that each of the other SLWP partner boroughs have presented reports to their respective committees to agree not to extend the current contract with Veolia.
- 11.3 As stated in the report, an extension would entail a significant rise in future service costs and existing guarantees on commercial waste income and recycle sales would no longer be provided.

- 11.4 Regulation 72 PCR 2015 sets out circumstances in which modifications to public contracts are permissible and a new procurement procedure is not required. In summary modifications are only permissible if they:
- have been provided for in the initial procurement documents; or
 - are for additional works, services or supplies by the original contractor where a change of contractor cannot be made for economic or technical reasons and would cause significant inconvenience or substantial duplication of costs for the contracting authority; provided that any increase in price does not exceed 50% of the value of the original contract; or
 - where all of the following conditions are fulfilled: —
 - (i) the need for modification has been brought about by circumstances which a diligent contracting authority could not have foreseen;
 - (ii) the modification does not alter the overall nature of the contract;
 - (iii) any increase in price does not exceed 50% of the value of the original contract or framework agreement; or
 - where a new contractor replaces the one to which the contracting authority had initially awarded the contract as a consequence of contractual provision or corporate re- structuring; or
 - where the modifications, irrespective of their value, are not substantial

The contractual modifications which would be necessary to extend the contract with Veolia would not fall within the scope of Regulation 72.

- 11.5 In determining options, the Council must ensure that it meets relevant statutory and other applicable obligations as detailed. These obligations include the collection of waste and its disposal under the Environmental Protection Act 1990, meeting carbon reduction targets and commitments made in relation to the Environment Act 2021 and obligations required by the Greater London Authority. Further detail is provided in the report.
- 11.6 Where the Council intends to re-procure the services or any part of the services, it must ensure that it advertises the contract/s in accordance with the Public Contracts Regulations 2015 or such other successor procurement regime in place at the time of Advertisement.
- 11.7 When considering available options, consideration must be given to TUPE and pensions and any resultant cost implications in the event that TUPE applies and any subsidiary arrangement that must be replaced or terminated contemporaneously with the Veolia contract.
- 11.8 Agreeing to the recommendations will cause the contract to expire at the end of its initial term, on 31st March 2025. The Executive Mayor has the power to exercise executive functions pursuant to s9E of the Local Government Act 2000.

Approved by Kiri Bailey Head of Commercial and Property Law on behalf of the Director of Legal Services and Monitoring Officer.

12. HUMAN RESOURCES IMPACT

- 12.1 There are no immediate HR implications arising from this report or from this decision for Council employees or staff.

Approved by: Gillian Bevan Head of HR Resources and Assistant Chief Executives Directorates.

13. EQUALITIES IMPACT

- 13.1 The Council has a statutory duty, when exercising its functions, to comply with the provisions set out in the Sec 149 Equality Act 2010. The Council must, in the performance of its functions, therefore, have due regard to:

- I. eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by or under this Act.
- II. advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.
- III. foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

- 13.2 There are no material equalities implications resulting from the recommendation(s) of this report. Equality implications will be addressed in the delivery of future services and further consultation will be undertaken as future services are designed and a commissioning strategy drafted.

- 13.3 Specific works and services will be developed through any commissioning process.

- 13.4 The council will build on existing best practice and take account of lessons learnt with internal and external stakeholders, including through resident survey work planned when developing any service specification utilising the Added Social Value Toolkit.

- 13.5 As this is an options review, a full equalities impact assessment will be undertaken and approved prior to any new service provision.

Approved by: Denise McCausland Equality Programme Manager

14. ENVIRONMENTAL IMPACT

14.1 There are no environmental impacts arising from this report.

Approved by: Steve Iles Director of Sustainable Communities

15. CRIME AND DISORDER IMPACT

15.1 There are no crime and disorder impact arising as a result of the recommendations within this report.

16. DATA PROTECTION IMPLICATIONS

16.1 WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?

NO

16.2 The Director of Sustainable Communities comments that the council's information management team have advised that a DPIA would not be required in this instance and that the subject of the report does not involve the processing of personal data.

Approved by: Steve Iles – Director of Sustainable Communities-----

CONTACT OFFICER: Steve Iles. Director of Sustainable Communities,
steve.iles@croydon.gov.uk, Softphone ext.: 28195

**BACKGROUND DOCUMENTS – LOCAL GOVERNMENT ACT 1972
Part B**

Appendix - Extension cost financial summary report

REPORT TO:	Cabinet 16th November 2022 Council 14th December 2022
SUBJECT:	South London Waste Plan Development Plan Document - Adoption
LEAD OFFICER:	Nick Hibberd, Corporate Director of Sustainable Communities, Regeneration & Economic Recovery Heather Cheesbrough, Director of Planning & Sustainable Regeneration
CABINET MEMBER:	Cllr Jeet Bains, Cabinet Member for Planning & Regeneration
WARDS:	All

SUMMARY OF REPORT:

In order to have an up-to-date planning framework to make decisions on proposals on sites which process waste, in addition to the Local Plan there is a separate Waste Plan. This report represents the final stage in the progression of the preparation of the joint South London Waste Plan Development Plan Document to adoption. It will then form part of the Council's Planning Policy Framework to spatially manage waste and be used to determine related planning applications.

The South London Waste Plan (SLW Plan) has been funded from a successful bid to the Department for Levelling Up, Housing & Communities, Planning Delivery Fund.

This is the final stage of the joint production of the South London Waste Plan following two stages of consultation in October- December 2019 (Regulation 18 Issues and Options) and September – October 2020 (Regulation 19 Submission) and the Examination in Public in September 2021.

FINANCIAL IMPACT:

In 2018, the four boroughs (Merton, Kingston, Sutton and Croydon) successfully bid for government funding for £136,594 for joint working to produce a new South London Waste Plan Development Plan Document. Not all this funding has been spent and the South London Waste Plan continues to be funded from this grant award. The adoption of the South London Waste Plan Development Plan Document can be funded by the remaining funds from this grant.

KEY DECISION REFERENCE NO.: 6022EM

RECOMMENDATIONS:

The Executive Mayor in Cabinet is recommended to;

- i. Note this report on the progress made to date towards the development of a National Planning Policy Framework compliant development plan document, the South London Waste Plan 2022 to 2037 (Appendix 1) and that as a result a favourable Inspector's Report is expected shortly finding the SLW Plan to be sound.
- ii. The Cabinet is to further note that the final Inspectors Report is delayed and still awaited.
- iii. Recommend Council to adopt the South London Waste Plan 2022 to 2037, subject to the recommendations in the Inspector's Report as a Development Plan Document in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012.

1. EXECUTIVE SUMMARY

- 1.1. The purpose of this report is to report on the progression of the development of a National Planning Policy Framework compliant Development Plan Document, the South London Waste Plan. This is a joint plan undertaken by the four boroughs of Merton, Kingston, Sutton and Croydon that allocates sites, has specific planning policies and designated areas suitable for waste management development. This report is anticipating approval to adopt the revised South London Waste Plan 2022-2037 (SLW Plan) following the receipt of a report from the Secretary of State's appointed panel of Inspectors' who undertook the examination of the plan finding it sound subject to modifications being made. *The final Inspector's Report will be available at the full Council meeting but it is still awaiting Ministerial sign off.*
- 1.2 The existing SLW Plan will finish in 2022 so this revision is needed. The revised SLW Plan sets out how the projected amounts of waste to be generated within the four boroughs and the amount of waste apportioned to the boroughs in the adopted London Plan 2021 will be managed. The SLW Plan is not about waste collection and disposal services or the waste contracts. It is a statutory requirement as outlined in the National Planning Policy Framework 2021 to have an up-to-date waste plan for the borough.
- 1.3 A report from the Planning Inspectors' about the SLW Plan 2022 is anticipated and this should be available before it is adopted by all the Councils. It can then be brought into use to determine planning applications as a Development Plan Document (DPD) that forms part of the Council's Local Development Framework. It should be noted that during the SLW Plan Examination in Public the government adopted a new National Planning Policy Framework (NPPF), which now requires that a Development Plan Document (such as the SLW Plan) has a lifespan of 15 years from adoption. The SLW Plan is supported by evidence that

gives it a lifespan of 2022 to 2037, which means it has to be adopted this year to meet the NPPF requirement. The SLW Plan needs to be reported to Council in December 2022 for formal adoption.

2. PREPARATION OF THE SOUTH LONDON WASTE PLAN 2022-2037

2.2 In 2012, the London boroughs of Croydon, Sutton, Kingston and Merton, working jointly produced and adopted the South London Waste Plan (Development Plan Document) 2012-2022. This had the aim of providing policies for making decisions on planning applications for waste use and safeguarding a range of existing waste sites for waste management purposes with designated sites appearing on the boroughs' Planning Policies Maps. The plan also safeguarded existing waste sites and identified areas which may be suitable for waste use. The South London Waste Plan 2022-2037 now updates (although through an almost entirely re-written document) the 2012 waste plan that seeks to provide continuous policy coverage to determine waste planning applications.

2.3 The draft SLW Plan for 2022-2037 was consulted upon twice between October and December 2019 (regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012 generally known as 'Issues and Options') and between September and October 2020 (regulation 19 generally known as 'Submission'). It was submitted to the Planning Inspectorate in January 2021 and an Examination in Public (EiP) was held in front of the Secretary of State's appointed panel of two Inspectors' in September 2021 with subsequent correspondence since then to identify the Main Modifications required to make the plan sound, including;

- Written response to the Inspectors' [preliminary matters and initial questions](#) in March 2021 on targets, the new London Plan and queries about sites,
- Written responses to the Inspectors' detailed "[Matters, Issues and Questions](#)" in July 2021 that formed to subject areas for the Examination in Public,
- Evidence and arguments presented in person to the Inspectors' over two days of hearings in September 2021. This gives the Inspectors' the opportunity to ask further detailed questions regarding the written responses and an opportunity for us to respond to the hearing statements submitted by the other participants.

2.3. The Inspectors' role is to determine whether the draft SLW Plan is: (a) legally compliant; and (b) sound. After considering all the evidence and arguments that had been presented, at the end of the hearing sessions the Inspectors' provided a summary of 'where we are' and gave an indication of the next steps that the Councils need to take. As with all EiPs, the Inspectors' required some modifications to the Plan in order for them to be able to conclude that the SLW Plan was sound. The majority of these changes were not fundamental and were so minor and thus did not result in additional clarity/improvements to the Plan.

- 2.4. A further round of consultation was undertaken on [the main modifications and associated evidence](#), the “Main Modifications” between 14 July and 2 September 2022 as this consultation was undertaken after the submission of the SLW Plan the consultation responses were sent to the Inspectors’ to take into account when writing their report. The final Examination report once received is expected to state that they were satisfied that the Main Modifications addressed the issues raised during the course of the Examination and that the SLW Plan has been found sound.

3. Risks

- 3.1. There is now requirement to make timely progress with the next step towards adoption of the SLW Plan. During the SLW Plan EiP the government adopted a new National Planning Policy Framework (NPPF), which now requires that a Development Plan Document has a lifespan of 15 years *from adoption*. The SLW Plan has a lifespan of 2022 to 2037, which means it has to be adopted by all four authorities in 2022 to meet the NPPF requirement. If adoption is delayed to 2023 the boroughs would need to produce new additional supporting evidence and changes to the SLW Plan such as to analyse the latest Environment Agency waste data, recalculate all the waste figures in the SLW Plan, and make any other consequential alterations, resubmit this to the Inspectors’ and undertake an additional round of consultation which will be time consuming and costly. To avoid this, the boroughs need to all accept the recommendations in the Inspector’s’ Report, when received and allow the final SLW Plan to be adopted by all the partner Councils by the end of December 2022.

4. CONSULTATION

- 4.1 There have been two rounds of consultation undertaken as required by the regulations¹⁸ and 19 of The Town and Country Planning (Local Planning) (England) Regulations 2012. These rounds of consultation were used to develop the policies in the SLW Plan before it was submitted for Examination. A further Main Modifications consultation on the instruction of the Inspectors’ took place this summer to address issues raised during the Examination. The Inspectors’ will have taken into account the responses to the Main Modifications in their report and make a recommendation on soundness. As required by the Regulations a full report of the consultations undertaken was part of the bundle submitted with the SLW Plan.

5. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 5.1 Waste planning is something that lends itself to joint working as it uses an apportioned approach across borough boundaries with the amounts that need to be met as set out in targets in the London Plan March 2021. A joint waste plan enables the four boroughs to plan for this waste apportionment with a strategic approach. It is a statutory requirement and as outlined in the National Planning Policy Framework to have an up-to-date waste plan for the borough.

6. OPTIONS CONSIDERED AND REJECTED

- 6.1 **Adopt SLWP** – this will provide the boroughs with an up-to-date Development Plan based on local evidence and local knowledge to use to spatially manage waste and determine planning applications.
- 6.2 **Do not adopt the SLW Plan** – the adopted South London Waste Plan 2012 expires at the end of 2022 so should the new plan not be adopted there would not be a Development Plan in 2023. The fall -back position would be to use the guidance in the National Planning Policy Framework to determine planning applications. The NPPF being the national guidance is a one size fits all approach so local issues may not be able to be adequately addressed.

7. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

1 Revenue and Capital consequences of report recommendations

- 7.1 In 2018, the four boroughs successfully bid for £136,594 from the government Planning Delivery Fund for joint working to produce a new SLW Plan. Not all of this funding has been spent and finalising the South London Waste Plan towards adoption will continue to be funded from this grant award. The London Borough of Sutton manage the project budget, with support from the existing resource of the Croydon Plan Making Team – Spatial Planning, Growth Zone and Regeneration, and this stage of the Plan’s production and adoption does not create any budget pressure for Croydon Council. There are sufficient budget monies available to complete the project as the large expense of the examination which has been held is now known and has been paid for.

	Current Year	Medium Term Financial Strategy – 3-year forecast		
	2022/23 £'000	2023/24 £'000	2024/25 £'000	2025/26
Revenue Budget Available				
Expenditure Income				
Effect of decision from report				
Expenditure Income				
Remaining Budget				

Capital Budget available	£35,725 (of a budget since 2019 £136,594)			
Expenditure	£35,725			
Effect of decision from report				
Expenditure Income				
Remaining Budget	£0	£0		

2 The effect of the decision

7.2 This is a joint plan undertaken by the four boroughs of Merton, Kingston, Sutton and Croydon as a statutory function, that updates the adopted South London Waste Plan 2012-22 which allocated sites, created planning policies and designated areas suitable for waste management development. The existing South London Waste Plan will expire in 2022. The South London Waste Plan 2022 – 2037 sets out how the projected amounts of waste to be generated within the four boroughs and the amount of waste apportioned to the boroughs in the London Plan 2021 will be managed. These are planning policy matters and not connected to waste collection or the waste collection contract.

3 Risks

7.3 There is now necessary to undertake the final step towards adoption of the SLW Plan as the new National Planning Policy Framework (NPPF) 2021, now requires that a DPD has a lifespan of 15 years from adoption. The draft Plan has a lifespan of 2022 to 2037, which means it has to be adopted in 2022 to meet the NPPF requirement. Should the SLW Plan not be adopted the implications and consequences as set out in paragraph 6.2 above will be engaged. This additional work would require extensive additional budget monies beyond the existing project budget.

4 Options

- **Abandon the Waste Plan** - This would leave all the Councils with no planning scope to refuse inappropriate waste treatment planning applications or negotiate amendments to inappropriate waste treatment planning applications and pre-applications

- **Accept all the Inspector's Report findings and adopt** - This gives the Councils the necessary statutory planning scope to approve appropriate waste treatment planning applications and refuse those that are inappropriate.

5 Future savings/efficiencies

- 7.4 The project is being fully funded by a government grant and supported by the existing resource in Spatial Planning, Plan Making Team and can be delivered with the current establishment staff level. Post adoption the SLW Plan will provide a planning framework to determine waste proposals, so should reduce the likelihood and costs associated with planning appeals.

Approved by: Darrel Jones, Interim Head of Finance for Sustainable Communities Dated 30.9.22. (checked by Kay Oshin)

8. Pre-Decision Scrutiny

- 1.1. This report on the South London Waste Plan, will be presented to Scrutiny on 8th November 2022, before it is put forward for decision by the Cabinet and Council.

9. LEGAL CONSIDERATIONS

- 9.1 As waste planning authorities, all four of the boroughs have a statutory duty to prepare a waste Local Development Plan in line with Article 28 of the Waste Framework Directive (2008) (as amended).
- 9.2 The Housing and Planning Act 2016, gives the Secretary of State greater powers to intervene in the Local Development Plan making process. Specifically, it would allow the Secretary of State to intervene if a local authority was failing or omitting to do anything it is necessary for them to do in connection with the preparation, revision or adoption of a Local Development Plan.
- 9.3 The SLW Plan has been produced according to the Planning and Compulsory Purchase Act (2004, as amended) and the Town and Country Planning (Local Planning) (England) Regulations as set out in the report.

Approved by: Samra Yunus Corporate Solicitor on behalf of Stephen Lawrence – Orumwense, the Director of Legal Services and Monitoring Officer Date approved: on 3rd November 2022

10. HUMAN RESOURCES IMPACT

- 10.1 There are no Human Resource impacts as the production and adoption of the South London Waste Plan is set out in the Spatial Plan Service Plan and can be delivered with the current establishment staff level. If any issues arise these will be managed under the Council's policies and procedures.

Approved by: Jennifer Sankar, Head of HR Housing Directorate & Sustainable Communities, Regeneration and Economic Recovery, for and on behalf of Dean Shoemith, Chief People Officer. Date approved: 24 October 2022

11. EQUALITIES IMPACT

- 11.1 The Sustainability Appraisal, accompanying the Draft South London Waste Plan, includes a comprehensive Equalities Impact Assessment covering all four boroughs involved see background documents.
- 11.2 The Equality Analysis concluded that the proposed policies are expected to have a positive impact on groups that share a protected characteristic, by increasing employment and healthier environment. Further details can be found in on pages 27-28 of Appendix 3 (Equality Impact Assessment)

Approved by: Denise McCausland – Equality Programme Manager Dated 27 September 2022.

12. ENVIRONMENTAL IMPACT

- 12.1 A full Sustainability Appraisal (incorporating a Strategic Environmental Assessment) of the draft South London Waste Plan has been prepared and the findings incorporated into the Proposed Submission report. This can be found in Appendix 3 of this report. Under regulation 13 of the Environmental Assessment of Plans and Programmes Regulations 2004, the Sustainability Appraisal must also be consulted upon alongside the draft South London Waste Plan.

13. CRIME AND DISORDER REDUCTION IMPACT

- 13.1 There are no crime and disorder reduction impacts arising from the recommendations of this report.

14. DATA PROTECTION IMPLICATIONS

- 14.1 **WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?**

NO

CONTACT OFFICER: Steve Dennington, Head of Spatial Planning & Interim Head of Growth Zone and Regeneration

APPENDICES TO THIS REPORT:

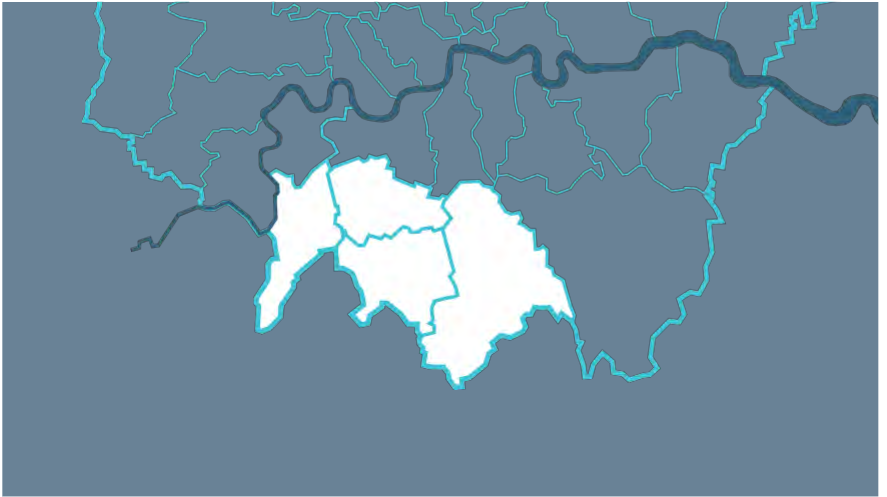
Appendix 1: [Draft South London Waste Plan \(Proposed Submission\)](#)

BACKGROUND DOCUMENTS – LOCAL GOVERNMENT ACT 1972

<https://www.croydon.gov.uk/planning-and-regeneration/planning-policy/croydons-development-plan/south-london-waste-plan>

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- L B Croydon
- R B Kingston
- L B Merton
- L B Sutton



South London **Waste Plan**



Draft for Submission to Government Consultation Document

September 2020



The Publication and Request for Representations

This is the Submission Version of the South London Waste Plan 2021-2036.

The South London Waste Plan is a joint document produced by the London Borough of Croydon, the Royal Borough of Kingston, the London Borough of Merton and the London Borough of Sutton to guide the development of waste treatment facilities across the four boroughs. It includes policies to guide waste treatment development and safeguards existing sites.

This document is termed the Submission Version because it is intended to be submitted to the Secretary of States for Housing, Communities and Local Government for Examination-in-Public.

The publication of the Submission Version of the South London Waste Plan is undertaken to meet the requirements of Regulation 19 of The Town & Country Planning (Local Planning) (England) Regulations 2012.

An accompanying Sustainability Appraisal is also available for consultation.

Representations to be made

from Friday 4 September to Thursday 22 October 2020

The planned timetable for the South London Waste Plan is also follows:

February - June 2019	Evidence Gathering
October - December 2019	Issues and Preferred Options Consultation
September - October 2020	Submission Version Representations
November 2020	Submission to the Secretary of State
January 2021	Examination-in-Public
March onwards	Adoption

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The South London Waste Plan – What It Is

- 1.1 The South London Waste Plan sets out policies and safeguards sites for waste facilities across the boroughs of Croydon, Kingston, Merton and Sutton from 2021 to 2036. It is to be used for the determination of planning applications relating to waste facilities (i.e. a facility on a site where waste is sorted, processed, recycled, composted or disposed of or a facility on a site where waste is mainly delivered for bulking prior to transfer to another place for processing, recycling, composting or disposal). Development for waste facilities should only be allowed in accordance with this plan and other documents and plans which constitute a borough's Development Plan, unless material considerations indicate otherwise.



- 1.2 The South London Waste Plan is a joint Development Plan Document and will form part of the Development Plans for the London Borough of Croydon, Royal Borough of Kingston, London Borough of Merton and London Borough of Sutton.
- 1.3 Most adopted plans within a borough's Development Plan, such as a Local Plan or Core Strategy, are likely to have policies which are also relevant to a waste application. Each borough may also have adopted Supplementary Planning Documents which may be relevant. Furthermore, applications will also be decided according to the policies of the Mayor of London's London Plan, which is also part of the Development Plan. Therefore, for the development of a waste facility, a number of adopted plans and supplementary planning documents will have to be consulted.
- 1.4 For further information, in the first instance, visit the planning policy pages of the relevant borough's website:
- www.croydon.gov.uk/planningandregeneration/framework
 - www.kingston.gov.uk/info/200157/planning_strategies_and_policies/285/development_plan_documents
 - www.merton.gov.uk/planning-and-buildings/planning/localplan
 - www.sutton.gov.uk/planningpolicy
- 1.5 The London Plan can be accessed at:
www.london.gov.uk/what-we-do/planning/london-plan



Introduction

Background

- 2.1 The four south London boroughs of Croydon, Kingston, Merton and Sutton have a responsibility to plan for waste facilities as statutory Waste Planning Authorities. In 2007, the four boroughs decided to plan for waste collaboratively and produce a joint Development Plan Document (DPD), covering the principal types of waste such as household, commercial and industrial and construction and demolition waste. This resulted in the production of the South London Waste Plan which was adopted in 2012 covering a 10 year time period 2011 to 2021. This South London Waste Plan is the replacement document and covers the period 2021 to 2036.
- 2.2 The South London Waste Plan sets out the partner boroughs' long-term vision, spatial strategy and policies for the sustainable management of waste over the next 15 years. Policies and site safeguarding set out in detail how the four boroughs will meet their waste management targets and limit the impact of waste facilities.
- 2.3 The South London Waste Plan boroughs should prepare a waste local plan in line with Article 28 of the Waste Framework Directive (2008, as amended). This plan must set out an analysis of the current waste management situation and future forecasts, an assessment of the need for waste installations, location criteria for sites and policies.
- 2.4 The "National Planning Policy for Waste" (NPPW), published in 2015, sets out the Government's waste planning policies which all Waste Planning Authorities must have regard to when developing local waste plans. The NPPW is supplemented by the "Planning Practice Guidance" section on waste which provides further detail on how to implement the policies.
- 2.5 The NPPW states that Waste Planning Authorities should have regard to their apportionments set out in the London Plan when preparing their plans and work collaboratively in groups with other waste planning authorities to provide a suitable network of facilities to deliver sustainable waste management.

Planning for Waste

The Waste Hierarchy

- 2.6 The underlying philosophy for the management of waste is reflected in the waste hierarchy which ranks waste options according to a priority and is usually shown in an inverted pyramid-like diagram, see overleaf. The ranking of the various waste management options is based on current scientific research on how the options would impact on the environment in terms of climate change, air quality, water quality and resource depletion.
- 2.7 The waste hierarchy illustrates the principle that the top priority for waste is to prevent creating it in the first place, then it is re-use, recycled, recovered and finally disposed of (e.g. landfill). This is a spatial planning document so it does not directly concern itself with the prevention of waste but it does seek to manage waste in the highest levels possible.



National Drivers

2.8 The Waste Management Plan for England (2013) sets out the Government's ambition to work towards a more sustainable and efficient approach to resource use and the management of waste. To that effect, it encourages waste planning authorities to:

- Deliver sustainable and efficient facilities
- Consider waste management alongside other requirements such as transport, housing and jobs
- Ensure businesses and residents are engaged
- Drive waste up the Waste Hierarchy

2.9 The way that waste authorities need to deliver effective waste planning is to apply the principles of self-sufficiency and proximity (commonly referred to as the "proximity principle"). This, in theory, expects waste authorities to deal with their own waste but there is no expectation that each local authority should deal solely with its own waste and instead should strive for net self-sufficiency. However, planning over a larger area such as that covered by the South London Waste Plan boroughs does provide for a more strategic and sustainable approach to waste in this area.

Regional Drivers

2.10 The regional driver for the South London Waste Plan is the Mayor of London through the London Plan. This plan takes into consideration the policies and targets of the 2019 Intend to Publish (ItP) London Plan.

2.11 The 2019 ItP London Plan reflects the general philosophy of the waste hierarchy as well as national guidance but, in informing the South London Waste Plan, it sets out how this should be achieved in London. In particular, the 2019 ItP London Plan reiterates the targets for waste management set out in the Mayor’s London Environment Strategy (2018), namely:

- No biodegradable or recyclable waste to landfill by 2026
- 65% of ‘municipal’ (household and business) waste recycled by 2030, comprising: 50% Locally Authority Collected Waste recycled by 2025; and 75% business recycled by 2030
- 95% of construction, demolition and excavation waste to be recycled by 2020

2.12 The strategic approach and policies in the London Plan are based on the forecast amount of waste that needs to be planned for: the arisings. These are then transformed into apportionments for individual boroughs based on criteria on the scope of a borough to manage waste. These have informed this South London Waste Plan and more information on the apportionments are set out in Section 4 (Policy WP1 and WP2).

2.13 In order to meet the apportionment and targets, the 2019 ItP London Plan requires boroughs to:

- Safeguard existing sites
- Provide new waste management sites where required
- Optimise the waste management capacity of existing sites, and
- Create environmental, social and economic benefits from waste and secondary materials management





Local Drivers

- 2.14 The South London Waste Plan is driven by the need of the boroughs to meet their 2019 ItP London Plan targets and apportionments and the sustainable development aim to provide enough waste capacity to manage the waste the area generates.
- 2.15 To this end, in December 2018, the four boroughs commissioned waste planning consultants Anthesis to undertake a study of the boroughs' existing capacity and likely future capacity. From this evidence, the following preferred strategy has been identified:
- Safeguard existing, operational waste sites
 - Encourage the intensification of appropriate sites to meet any shortfall
 - Not plan for other waste streams as either the waste stream is so small as to be insignificant or the capacity is sufficient already

The Sustainability Appraisal

2.16 This plan is accompanied by a Sustainability Appraisal. The purpose of a Sustainability Appraisal is to evaluate development policies and proposals through the integration of social, environmental and economic considerations during the preparation of the planning documents. The South London Waste Plan boroughs have already produced a Scoping Report, setting out the sustainability issues and how they will be evaluated, and a Sustainability Appraisal on the South London Waste Plan Issues and Preferred Options document has also been carried out. The Sustainability Appraisal with this plan also forms part of the consultation.

Equalities Impact Assessment

2.17 The plan has also been subject to an Equalities Impact Assessment to ensure the South London Waste Plan does not adversely affect members of socially excluded or vulnerable groups and to meet the partner boroughs' statutory duties.

Duty to Cooperate

2.18 The Localism Act 2011 (Section 110) prescribes the "Duty to Co-operate" between local authorities in order to ensure that they work together on strategic issues such as waste planning. The duty is "to engage constructively, actively and on an on-going basis" and must "maximise the effectiveness" of all authorities concerned with plan-making. For matters such as waste planning, it is therefore important that local authorities can show that they have worked together in exchanging information and reaching agreement on waste issues, particularly cross-boundary issues. This process has been undertaken as part of the preparation for this South London Waste Plan and is an ongoing process.





Key Issues

- 3.1 Like the South London Waste Plan 2012, the development of the replacement South London Waste Plan must be informed by an up-to-date and proportionate analysis of the context of the plan area and the key issues and challenges facing it.
- 3.2 A full description of the partner boroughs' characteristics is available in the accompanying Sustainability Appraisal report. The SA includes an analysis of population demographics, employment, social deprivation and the provision of transport networks. It identifies the location of the boroughs' conservation areas, nature conservation areas and protected open space as well as areas at risk of flooding. These are all important factors when considering suitable locations for waste management facilities. The Sustainability Appraisal has been produced alongside the South London Waste Plan and has influenced the Plan's production.
- 3.3 Evidence supporting the South London Waste Plan has been produced by the consultancy Anthesis on behalf of the four boroughs. The draft South London Waste Plan Technical Report 2019 sets out key data on waste issues in south London and analyses it in the context of national policy, the published London Plan 2016 and the emerging draft London Plan 2017-2019. The SLWP Technical Report 2019 is available on line. published alongside this consultation.
- 3.4 From local evidence, national and London's policy on waste, five key issues have been identified for the draft South London Waste Plan 2021-2036 to address.

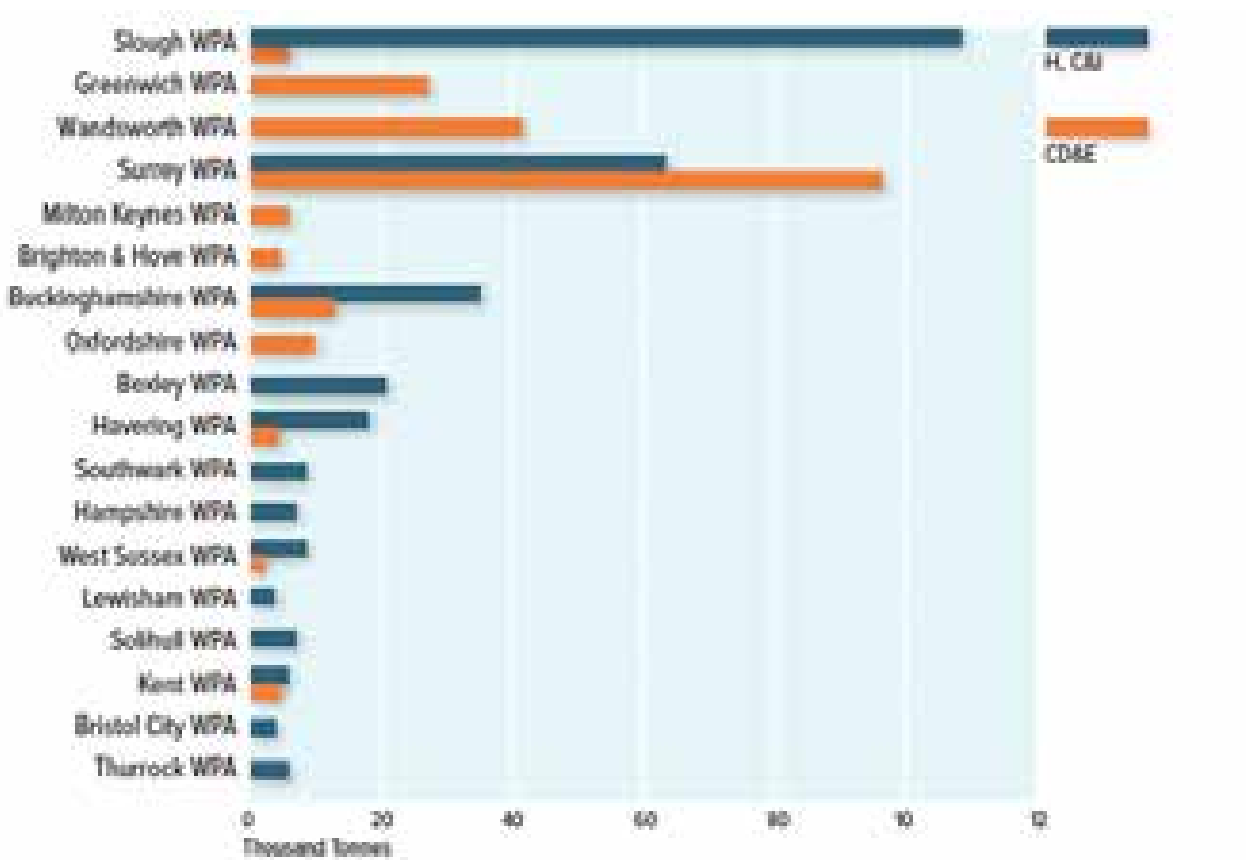
Key Issue 1 Cross Boundary Issues

- 3.5 Waste is a strategic cross-boundary issue. Authorities have a legal "duty to co-operate" under the Localism Act to ensure that authorities work together on strategic issues such as plan-making for waste.



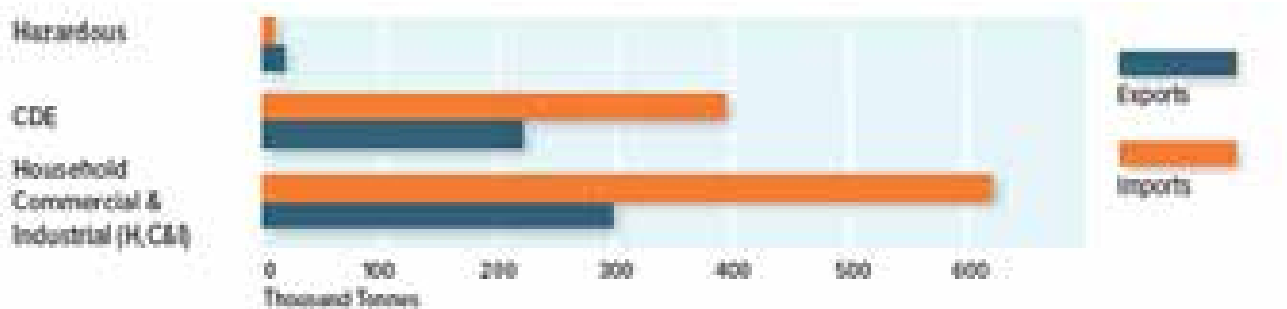
- 3.6 The Mayor’s London Plan considers waste arising from households, businesses and other sources within London’s boundaries and apportions an amount of this waste for each London borough to manage. However, different types of waste are managed in different facilities which often need a wide catchment to be economically viable so to achieve net self-sufficiency every area will have some waste imports and exports.
- 3.7 The South London Waste Plan Technical Report 2019 sets out in detail the last five years of exports and imports between the South London Waste Plan boroughs and other waste authorities.

Figure 2 South London Waste Plan Exports (tonnes) of Household, Commercial and Industrial (H, C&I) and Construction & Demolition (CD&E) Waste in 2017



- 3.8 The Technical Report Table 44 demonstrates that in 2017 approximately 300,000 tonnes of household and commercial and industrial waste was exported to be managed in other waste authorities. The majority of this was household waste sent to Slough Waste Planning Authority (specifically to Lakeside Energy Recovery Facility) but, in the future, this is due to be managed at Beddington. Table 45 sets out the exports of construction, demolition and excavation waste. The largest proportion (97,000 tonnes) was sent to nine different waste treatment facilities located within Surrey Waste Planning Authority, with no one facility receiving more than 31,000 tonnes.

Figure 3 South London Waste Plan Imports and Exports of Waste Streams in 2017 (tonnes)



3.9 Although it initially appears from the data that the South London Waste Plan area is a net importer of waste, most of the imported waste tonnage for both household/commercial and industrial waste (89%) and construction, demolition and excavation waste (77%) is not attributed to specific Waste Planning Authorities. Some of this waste is likely to have been generated within the South London Waste Plan boroughs themselves.

Figure 4 Origin of South London Waste Plan Imports of Household, Commercial & Industrial Waste (HC&I) in 2017 (tonnage percentage)

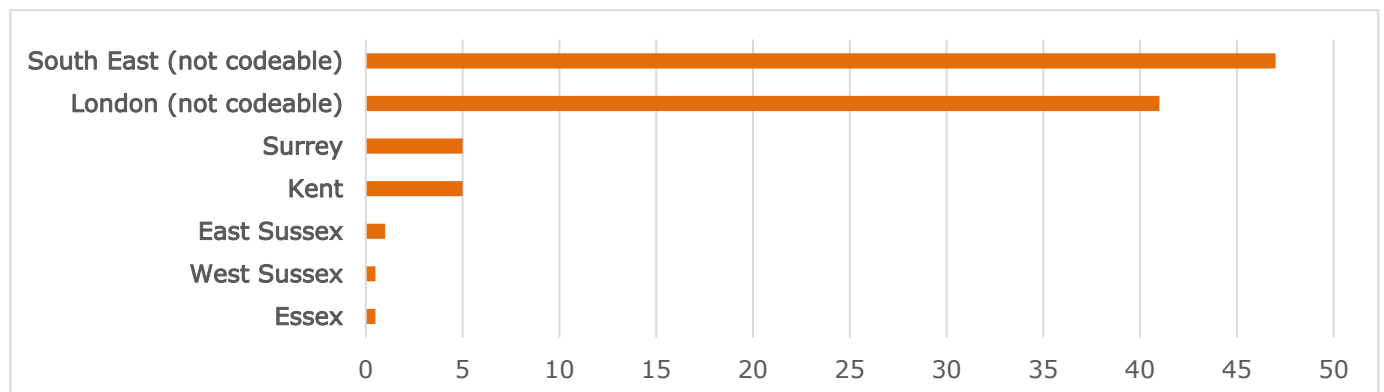
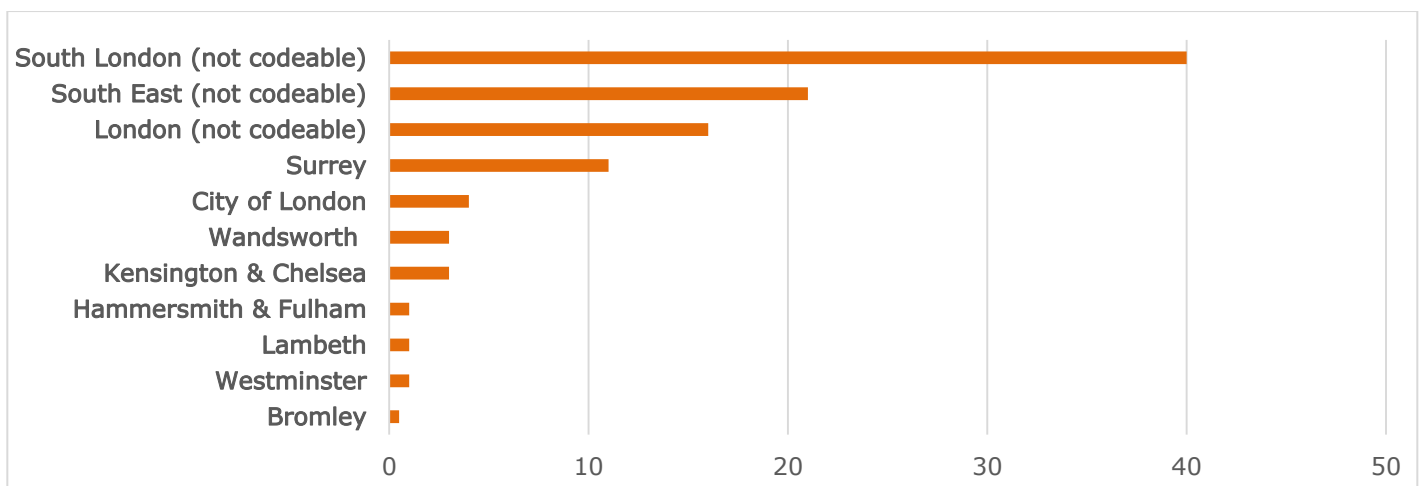
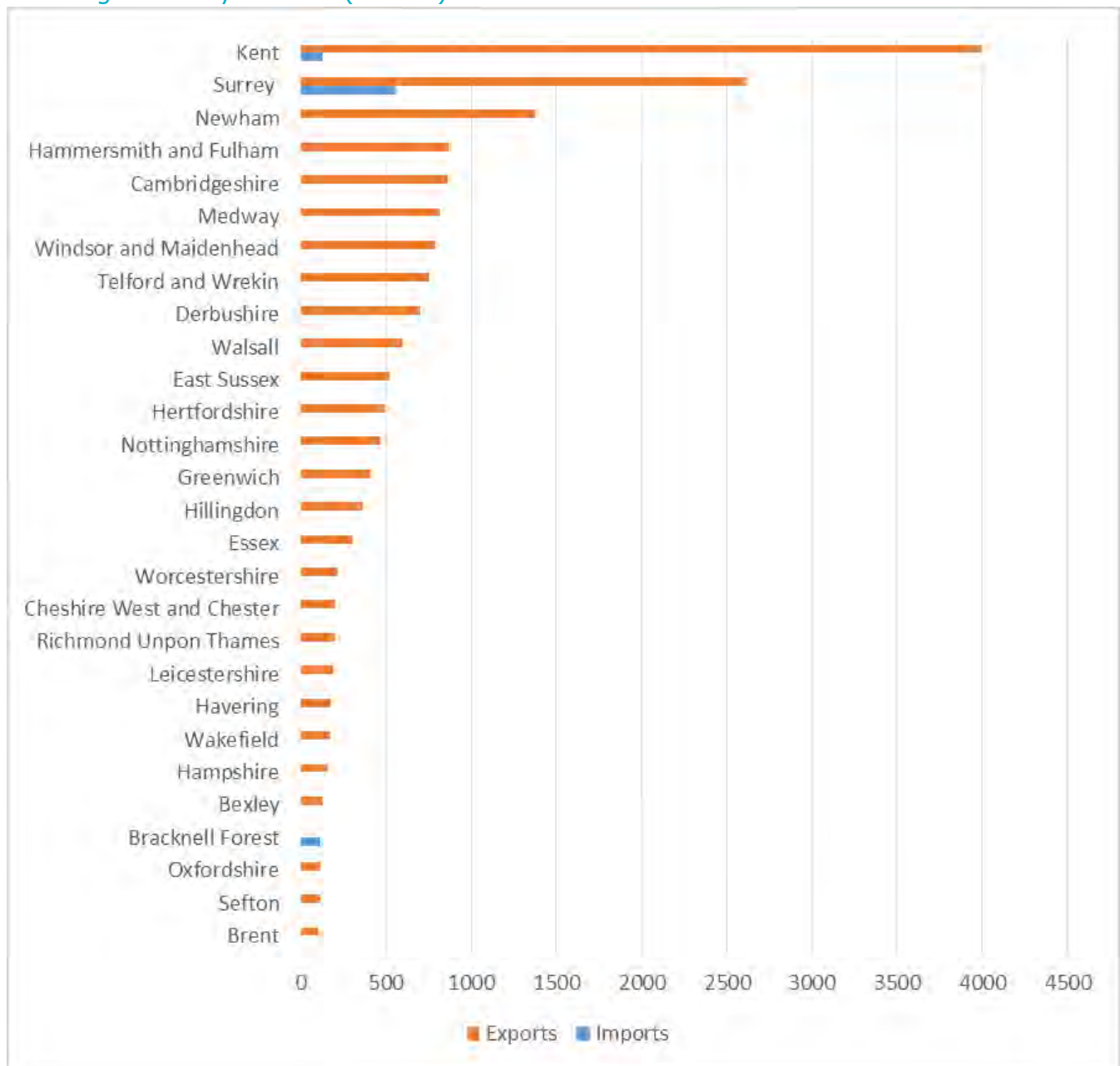


Figure 5 Origin of South London Waste Plan Imports of Construction, Demolition & Excavation Waste C, D&E in 2017 (tonnage percentage)



3.10 Hazardous waste, such as from healthcare, oil, solvents and other building materials, requires specialist facilities for treatment and disposal so may travel further than other types of waste as there are fewer and more dispersed specialist facilities required to deal with the lower tonnages. South London is a net exporter of hazardous waste; in 2017 the South London Waste Plan area exported 20,200 tonnes and imported 800 tonnes.

Figure 6 South London Waste Plan Imports and Exports of Hazardous Waste by Waste Planning Authority in 2017 (tonnes)

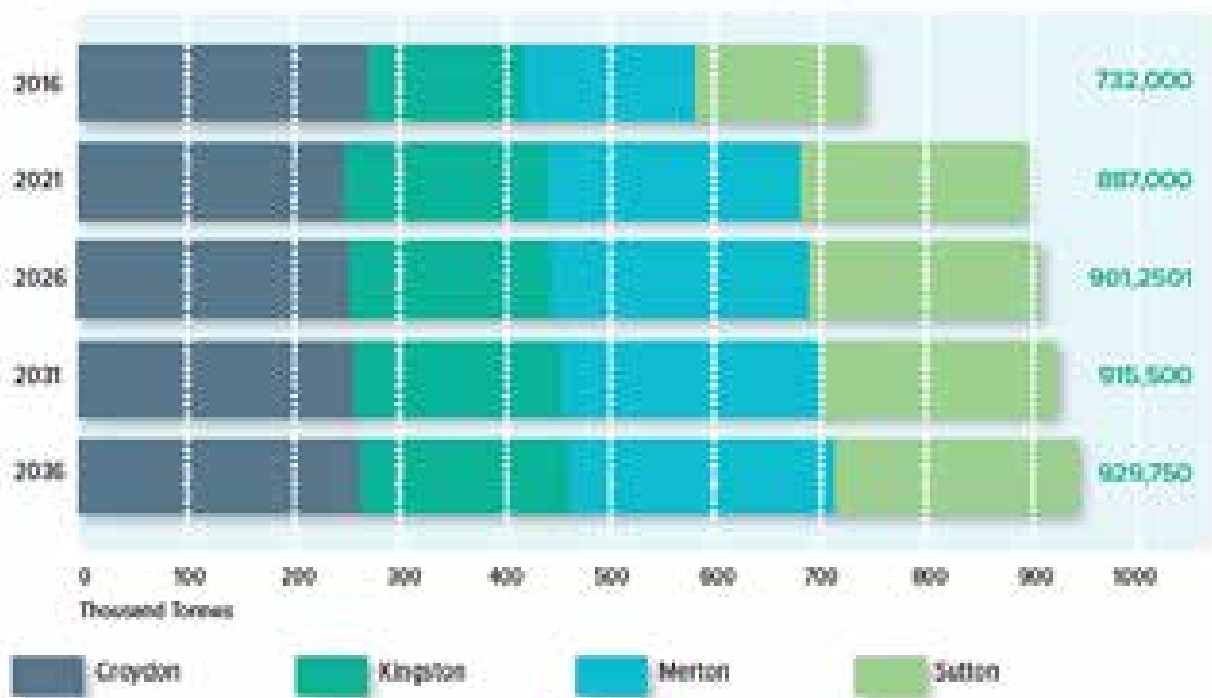


3.11 The task for the South London Waste Plan boroughs was to ensure that net self-sufficiency can be achieved and those facilities which receive South London waste are able to do so into the future. The achievement of this task can be seen in the Statements of Cooperation which accompany this plan.

Key Issue 2 How much waste must the South London Waste Plan plan for?

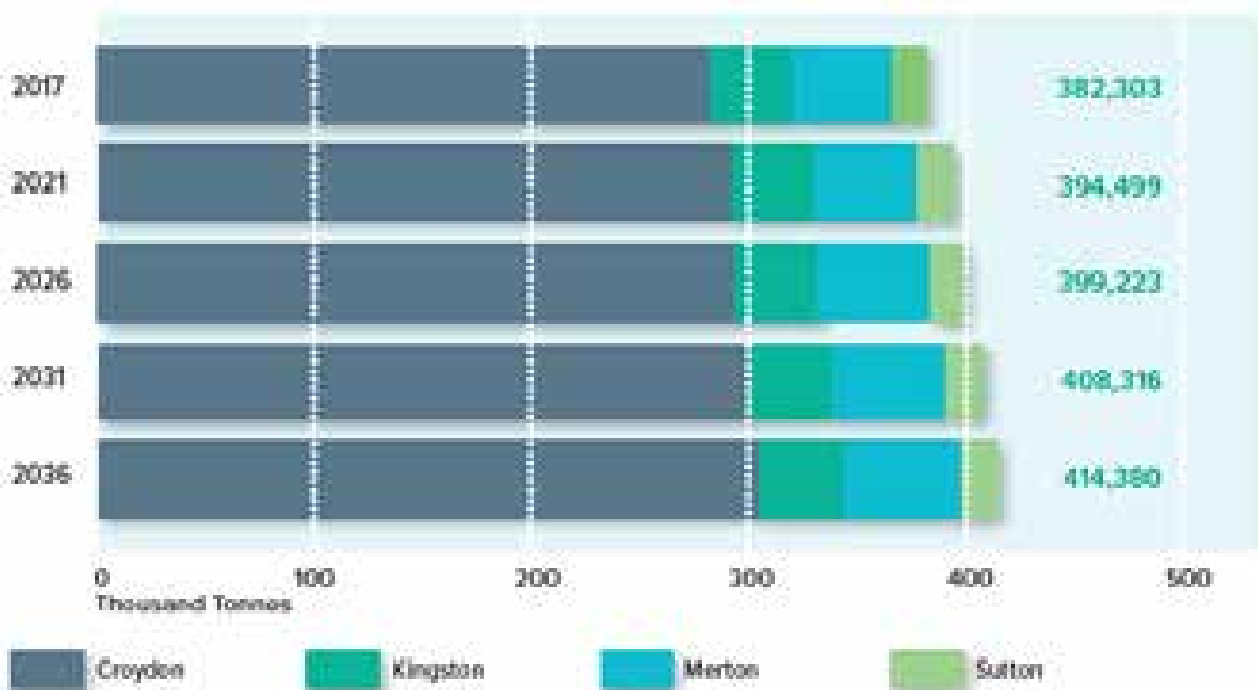
- 3.12 The National Planning Policy for Waste and the associated guidance requires waste planning authorities to plan for seven waste streams:
- 3.13 **Local Authority Collected Waste (LACW)**, also known as municipal or household waste: Waste collected by a Local Authority, including recycling, household and trade waste.
- 3.14 **Commercial/industrial**: non-hazardous waste produced by shops, businesses and industry.
- 3.15 These two waste streams are collectively the largest amount of waste produced in the South London Waste Plan area; both make up the 2019 ItP London Plan apportionment targets. Most of the boroughs within the South London Waste Plan area have been set apportionment targets higher than their anticipated waste arisings and collectively the apportionment is higher than the anticipated arisings. The 2019 South London Waste Plan Technical Report has therefore used the higher 2019 ItP London Plan apportionment targets for each South London Waste Plan authority as a more accurate and up-to-date target of what has to be planned for. As set out in Figure 7 below, the South London Waste Plan boroughs must plan for facilities to manage a target of 929,750 tonnes of apportioned waste (Local Authority Collected Waste and Commercial and Industrial Waste) by 2036.

Figure 7 Household, Commercial & Industrial Waste Targets (tonnes)



3.16 **Construction, Demolition & Excavation:** soil, concrete, brick, plastic, wood and other waste generated as a result of delivering infrastructure projects, building, renovation and the maintenance of structures. This is the third largest waste stream and the amount of waste produced each year is highly influenced in London by the strength or weakness of London’s housebuilding and commercial property development market. The London Plan sets a target that London will recycle and re-use 95% of Construction and Demolition Waste by 2020. The London Plan excludes excavation from the net self-sufficiency target as it is difficult to recycle this waste stream in a London context. The South London Waste Plan Technical Report 2019, chapter 4, sets out how the overall Construction and Demolition Waste arisings in the South London Waste Plan area has been forecast using GLA’s employment figures in the construction sector until 2036. By 2036 a total of 414,380 tonnes of Construction and Demolition waste should be managed in the South London Waste Plan area.

Figure 8 Construction and Demolition Waste Targets (tonnes)



3.17 **Other Waste Streams:** The other waste streams which the Government requires to be planned for are: Hazardous waste, Low Level Radioactive waste, Agricultural waste and Wastewater. However, as the text for Policy WP2 explains, there are either satisfactory arrangements in place, the waste stream is so small as to be insignificant or capacity improvements have already been made.

3.18 The task for the South London Waste Plan boroughs was to provide sufficient capacity for those waste streams which will need additional capacity to meet their 2036 target. This task has been achieved through Policies WP1, WP2 and WP3.

Key Issue 3: Scarcity of Land

- 3.19 In south London, any requirement for waste facilities must be considered and balanced against the land needs of other land uses.
- 3.20 All South London Waste Plan boroughs are set to see a substantial increase in house-building following the adoption of the 2019 ItP London Plan. The four boroughs are expected to deliver 4,430 new homes per year – an increase of 55% on their previous target - and with new housing comes the associated schools, healthcare, jobs and businesses and recreational areas that are essential to support a functioning city, a good quality of life and the sustainable development required by the National Planning Policy Framework. South London is also well known for its green and open spaces. Croydon, Kingston and Sutton all have Green Belt, which has some of the highest levels of protection from development, and 33% of Merton is protected green space, such as Wimbledon and Mitcham Commons.
- 3.21 Besides a huge increase in demand for land for new homes and associated infrastructure and the protection of green and open spaces, south London is also in demand for industrial land. The 2017 London Industrial Land Demand Study (CAG Consultants for the GLA, Figure 13.3) identified that in the four boroughs the potential loss of industrial land was virtually negated by requirements for warehousing and other types of industry. The vacant land that was identified is necessary for churn and a functioning land market. In the context of scarce land, it is necessary to plan sufficiently for waste but not sterilise industrial land for other uses by applying waste designations too widely.
- 3.22 Over the past decade, the South London Waste Plan boroughs have worked together on the South London Waste Plan 2011-2021. During these ten years, sites for waste management have been delivered in accordance with the plan. Modern waste facilities are more efficient in their layout, processing capability and landtake. This means waste facilities take less industrial land than in recent years. The task for the South London Waste Plan boroughs was to provide sufficient management capacity for waste uses but ensure that they do not stifle other land uses with high land demand. This task has been achieved through policies WP1, WP2, WP3 and WP4.



Key Issue 4: Waste Transfer Facilities



3.23 Given that the aim of the South London Waste Plan is to manage more waste within the plan's borders, thus supporting the Mayor of London's targets for greater self-sufficiency, and that logistics and travel is increasingly expensive, the need to transfer waste to facilities outside the plan area will change as more reuse, recycling and management facilities are developed. In practice, as set out in the South London Waste Plan Technical Report 2019 and based on Environment Agency data, most waste sites that operate mainly for the transfer of waste to other areas also have a waste management facility on-site, such as a bulking or materials recovery facility to assist with sorting and recycling.

3.24 Furthermore, there may be circumstances in which the transfer of waste remains an appropriate and desirable option. Examples include the transfer of hazardous waste to specialist treatment facilities in Cambridgeshire & Peterborough or the importation of household, commercial and industrial waste from Kent. Although the South London Waste Plan boroughs acknowledge that as much of their own waste as practicably possible should be managed within its boundaries, the South London Waste Plan should be sufficiently flexible to support transfer where waste cannot reasonably be treated within the plan area, or where the negative environmental impacts of doing so are greater than other options.

3.25 Transfer stations operated by waste management contractors tend to bulk collected wastes before transporting to other facilities for, for instance, landfilling, energy recovery or separation for recycling. As such this capacity does not count towards the London apportionment. However, many transfer stations do practice separation of recyclates from waste materials before they are bulked for onward transport. To properly recognise this additional recycling activity, the South London Waste Plan Technical Report 2019 has used Environment Agency data for five years to 2017 to produce an average recycling rate practiced within the waste transfer facility. The average recycling rate has then been counted towards the apportionment target and not as waste transfer. As the costs of materials and travel rise (particularly in London via initiatives such as the Ultra Low Emissions Zone expansion) this will further support the circular economy approach and result in a greater financial imperative to reduce waste and reuse waste materials.

3.26 The task for the South London Waste Plan boroughs was to encourage more reuse and recycling on waste transfer stations. This task has been achieved through Policy WP4.

Key Issue 5: Climate Change, the End of Landfill and the Circular Economy

- 3.27 As started by the South London Waste Plan 2011, the South London Waste Plan will reduce the reliance on disposal to landfill sites both within the plan area and outside London. Therefore, this South London Waste Plan will:
- Not safeguard the Beddington Farmlands landfill site as it is due to close in 2023 and its waste will be managed higher up the waste hierarchy as other recovery rather than disposal
 - Seek to reduce the amount of Construction and Demolition Waste going to landfills in Surrey.
- 3.28 Tackling climate change is a key Government priority for the planning system and a driver for all South London Waste Plan boroughs. The South London Waste Plan boroughs are all focused on the challenges posed by climate change and are driven by the requirements to mitigate and adapt to the effects of climate change. While it is recognised that waste management facilities will continue to generate CO2 emissions, the 2019 ItP London Plan requires major development, such as new waste facilities, to be net zero carbon and this is a key issue for the South London Waste Plan.
- 3.29 The South London Waste Plan boroughs support the 2019 Mayor's Environment Strategy and 2020 ItP London Plan proposals to move towards a circular economy, to keep products and materials circulating within the economy at their highest value for as long as possible. Leasing, sharing, reusing, repairing and re-manufacturing products - from lawnmowers to window glass - has been identified as having a positive impact on businesses, jobs and the economy as well as reducing waste. London and other cities are prime locations for moving from a linear to a circular economy due to the expense and traffic pollution incurred in transferring goods. Activities are already taking place in South London boroughs to move towards a more circular economy and include the reuse of materials recovered from extensive building demolition that might previously have ended up as construction and demolition waste and the establishment of repair facilities, usually in vacant retail units rather than on waste sites themselves.
- 3.30 The tasks for the South London Waste Plan boroughs was to continue their work to reduce the amount of waste going to landfill, make major waste developments zero carbon, make minor waste developments as close to zero carbon as possible and finally provide opportunities for the circular economy to expand. This task has been achieved through policies WP3, WP6 and WP7.





Vision and Objectives

4.1 The key issues identified in the previous chapter have informed the four South London Waste Plan boroughs' vision and objectives for the South London Waste Plan and these are set out below:

By 2036, the South London Waste Plan boroughs will have sufficient waste management facilities to be net self-sufficient with regard to their apportionment targets for Household and Commercial and Industrial waste streams, and the arisings targets for all other waste streams unless it is neither practicable nor necessary for that arisings target to be met.

The area will be managing waste efficiently and effectively on a select range of established sites and the operational effects of these sites will be mitigated. This will allow the sub-regional economy to flourish as a whole with other industrial uses being able to locate on other sites within the area's industrial estates.

4.2 To achieve this vision, the South London Waste Plan has the following objectives:

- **Objective 1:** Meet the 2019 ItP London Plan target for Household and Commercial and Industrial Waste
- **Objective 2:** Meet the identified needs for Construction and Demolition Waste, Excavation Waste, Low Level Radioactive Waste, Agricultural Waste, Hazardous Waste and Wastewater, where practicable or necessary
- **Objective 3:** Safeguard the existing waste sites to meet these targets and needs on existing sites, as set out on Pages 44-91 of this plan
- **Objective 4:** Ensure there is sufficient land for other industrial uses within the South London Waste Plan area's industrial estates
- **Objective 5:** Ensure waste facilities use sustainable design and construction methods and also protect and, where possible, enhance amenity
- **Objective 6:** Ensure the effects of new development are mitigated and, where possible, enhance amenity





WP1 Strategic Approach to Household and Commercial and Industrial Waste

London Plan Arisings and Apportionment Targets

5.1 The boroughs' targets for Household and Commercial and Industrial Waste are set by the Mayor of London and the boroughs are using the 2019 ItP London Plan waste arisings and apportionment targets as these are the most up-to-date targets. The Mayor calculates the amount of Household Waste produced by a borough as follows:



5.2 The amount of Commercial and Industrial Waste produced by a borough is calculated as follows:



5.3 However, the Mayor of London then redistributes portions of the borough arisings between boroughs, giving those boroughs he considers to have more scope to manage waste a higher waste management target (or apportionment) and those he considers has less scope to manage waste a lower waste management target. The Mayor used the following criteria for apportioning or redistributing waste between boroughs: existing waste facilities and industrial land, arisings in a borough, presence of railheads and wharves, proximity to major routes, restrictive land designations (such as heritage or biodiversity), flood risk and socio-economic factors.

5.4 The Mayor of London's arisings and apportionment targets for the South London Waste Plan boroughs are set out in Figure 11.

Figure 11 Arisings and Apportionment at 2021 and 2036 (tonnes per annum)

	2021		2036	
	Arisings	Apportionment	Arisings	Apportionment
Croydon	305,000	252,000	320,000	264,000
Kingston	152,000	187,000	157,000	196,000
Merton	174,000	238,000	180,000	249,250
Sutton	161,000	211,000	168,000	220,500
TOTAL	792,000	888,000	825,000	929,750

5.5 In 2036, the Mayor of London will expect the four South London Waste Plan boroughs to manage 13% more waste than the four boroughs generate.

Existing Capacity

5.6 Appendix 2 shows the existing capacity for waste management across the four South London Waste Plan boroughs. The figures have been calculated by Anthesis consultants for the four boroughs and what constitutes waste management and what sort of facilities provide waste management are set out in Figure 12.

Figure 12 Processes and Facilities which Contribute to Waste Management

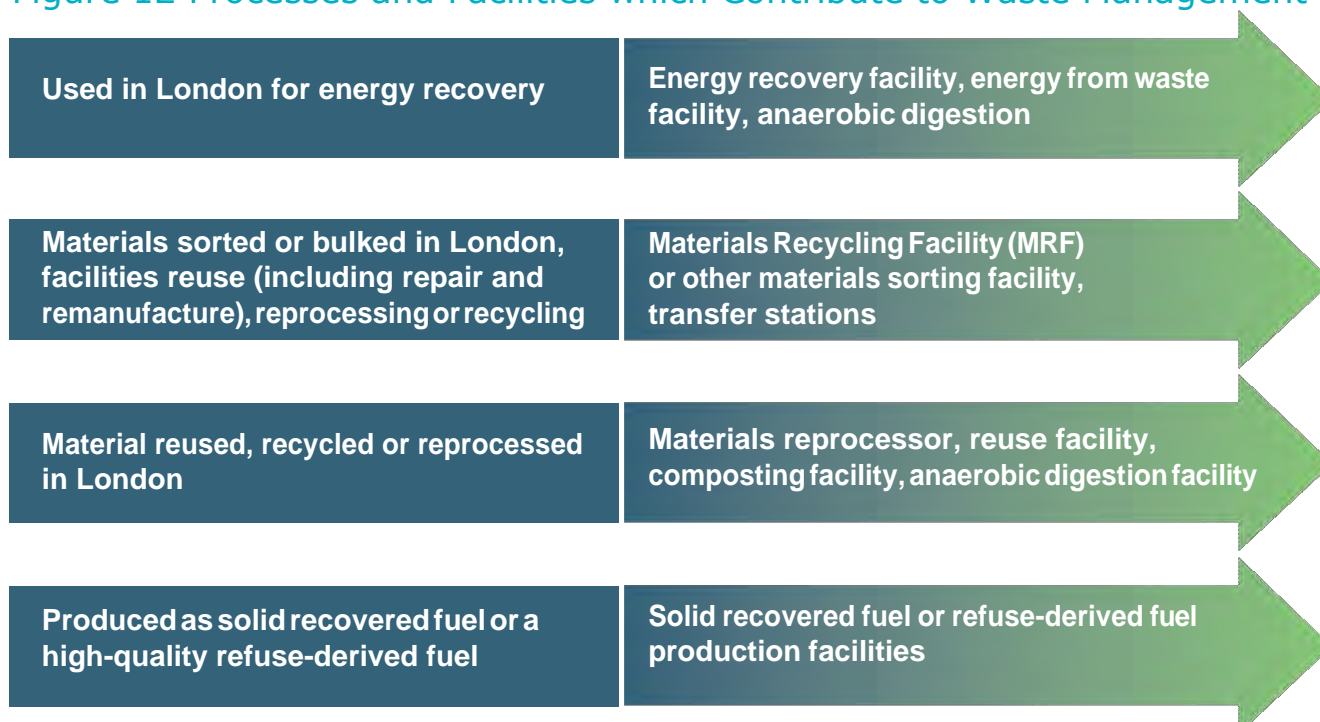
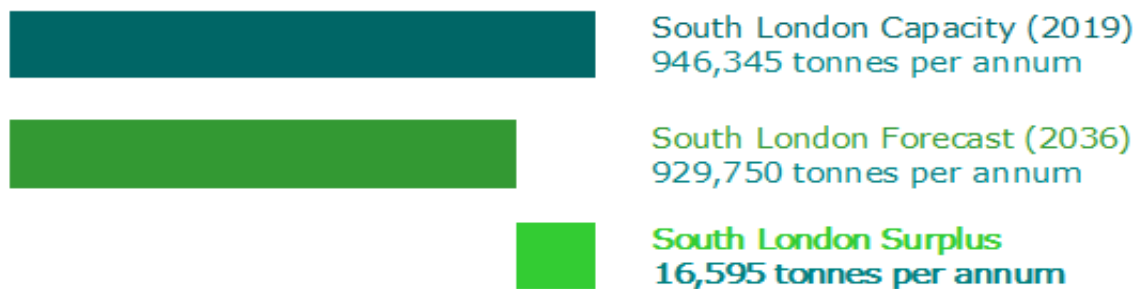


Figure 13 Capacity, Forecast and Surplus for Household and Commercial & Industrial Waste



5.7 Appendix 2 also shows that the current existing capacity for Household and Commercial and Industrial Waste is sufficient to meet the Mayor's apportionment, with the figures reproduced in Figure 13.

Approach to Meeting the Target

5.8 Since the four South London Waste Plan boroughs have sufficient waste management capacity to meet their 2036 target, it is proposed to safeguard the existing sites, which by virtue of having a planning permission and operating are available, viable and suitable, and allow the intensification of the existing sites where appropriate. Unlike the previous South London Waste Plan, the sufficient existing capacity means that the boroughs have no need to identify additional sites for waste management and no need to identify areas which may be suitable for waste management. As all the boroughs have a high demand in their industrial areas for other employment-generating uses, this is especially important for the South London Waste Plan boroughs. With industrial land in high demand, the South London Waste Plan boroughs do not want to be sterilising sites in industrial areas from other employment uses by unnecessarily designating waste sites.

5.9 Therefore, in accordance with Paragraph 3 of the National Planning Policy for Waste (which requires local authorities to plan for waste) the 2019 ItP London Plan apportionment targets and this plan's objectives:

WP1 Strategic Approach to Household and Commercial and Industrial Waste

- (a) The boroughs of the South London Waste Plan will work with the waste management industry to continue to develop efficient and more effective management eliminating the need for additional waste capacity.
- (b) During the lifetime of the plan, the boroughs of the South London Waste Plan will seek to meet the 2019 ItP London Plan apportionment target of managing 929,750 tonnes of Household and Commercial and Industrial waste per annum within their boundaries across the plan period to 2036.
- (c) The boroughs of the South London Waste Plan will deliver this by safeguarding existing waste sites and encouraging the intensification of these sites as appropriate (see Policy WP3).
- (d) New waste sites (either for transfer or management) will not be permitted, unless they are for compensatory provision (see Policy WP3).


WP2 Strategic Approach to Other Forms of Waste

5.10 In addition to Household and Commercial and Industrial Waste, the Planning Practice Guidance (Paragraph 013 Reference ID: 28-013-20141016) also requires local authorities to plan for Construction and Demolition Waste, Excavation Waste, Low Level Radioactive Waste, Agricultural Waste, Hazardous Waste and Wastewater.

Construction and Demolition Waste

5.11 Construction and Demolition Waste is mainly made up of soils, stone, concrete, brick and tile although other waste, such as wood, metals, plastic and cardboard can be found in the waste stream as well. The data regarding Construction and Demolition Waste is poor. Arisings are calculated by employment forecasts for the construction industry, which can be highly susceptible to fluctuations as a result of the health or otherwise of the regional and national economy. Capacity is also difficult to measure as it is suspected that a lot of the recycling or reuse of Construction and Demolition waste takes place on the construction site itself or at waste management facilities with exemptions from Environment Agency permits. Nevertheless, consultants Anthesis have produced a forecast of Construction and Demolition Waste for the South London Waste Plan boroughs and this is set out in Figure 14.

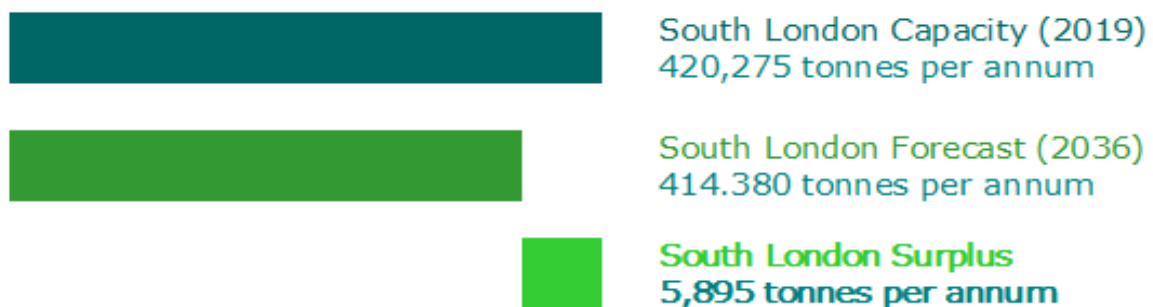
Figure 14 Construction and Demolition Waste Arisings and at 2021 and 2036 (tonnes per annum)



	2021 Arisings	2036 Arisings
Croydon	292,970	304,695
Kingston	37,887	39,040
Merton	47,975	54,038
Sutton	15,667	16,607
TOTAL	394,499	414,380

5.12 Appendix 2 shows the existing capacity across the four South London Waste Plan boroughs for Construction and Demolition waste management and it shows there is a small surplus for the 2036 forecast. The exact figures are set out in Figure 15.

Figure 15 Capacity, Forecast and Surplus for Construction and Demolition Waste



- 5.13 The South London Waste Plan boroughs consider that there is considerable scope for the intensification of Construction and Demolition sites and those with potential for intensification are set out in the sites section of the document and Appendix 2.

Excavation Waste

- 5.14 Excavation waste is defined as “naturally occurring soil, stone, rock and similar materials (whether clean or contaminated) as a result of site preparation activities” (Survey of Arisings and Use of Alternatives to Primary Aggregates in England: C, D&E Waste, DCLG, 2005). The 2019 ItP London Plan does not expect the capital to be net self-sufficient in excavation waste as “the particular characteristics of this waste stream mean that it will be challenging for London to provide either the sites or the level of compensatory provision to apply net self-sufficiency to this waste stream” (paragraph 9.8.1). Instead, 2019 ItP London Plan expects 95% of excavation waste to go to beneficial use (see the Glossary for the definition of beneficial uses)
- 5.15 In practice, it is very difficult to plan for excavation waste as (1) sites come and go as they develop a need for excavation waste and then are filled, for example the Chessington Equestrian Centre in Kingston; (2) landfill come on and off stream as they are filled; (3) increased construction and demolition waste recycling means less construction and demolition waste going to landfill and so landfills are filling more slowly; (4) increased economic activity leads to greater excavation waste and landfills filling more quickly.
- 5.16 The South East Planning Advisory Group’s Joint Position Statement on the Deposit of Land in the South East of England (2019) states: “the export of such waste [from London] for management within the South East will continue for the foreseeable future [and] inert waste arising on London can be used to restore mineral workings in the South East of England.” Therefore, the South London Waste Plan boroughs do not intend to make provision for such waste but would support an appropriate temporary site within the South London Waste Plan area for excavation waste should a proposal arise.





Low Level Radioactive Waste

5.17 Low Level Radioactive Waste commonly occurs in paper, plastics and scrap metal that have been used in hospitals, research establishments and the nuclear industry. There are currently no specific facilities for processing such waste within the South London Waste Plan area. Within the area, there are 10 organisations with permits to keep and use radioactive facilities. According to the Pollution Inventory Dataset (2017), only seven are active in the keeping and using of Low Level Radioactive Waste and all are hospitals or medical research establishments. Most Low Level Radioactive Waste is in the form of dust which can be washed off and therefore, these hospitals and research establishments have permits to discharge small amounts of permitted radioactive wastewater to the sewer. There are no solid transfers of this type of waste in any of the facilities. Therefore, this evidence places no requirement on the South London Waste Plan boroughs to provide for solid waste management infrastructure.

Agricultural Waste


5.18 The Waste Data Interrogator identified that only 383 tonnes of agricultural waste was generated in the South London Waste Plan boroughs in 2017. Given the relatively small tonnage of this waste, the fact that it can be mixed with Commercial and Industrial Waste and Construction and Demolition Waste and that it is often dealt with by Commercial and Industrial and Construction and Demolition waste facilities, there is no need for the South London Waste Plan boroughs to provide for this waste stream.

Hazardous Waste

5.19 Hazardous waste is categorised as waste which is harmful to human health either immediately or over a period of time. Typically, hazardous waste can include asbestos, chemicals, oil, electrical goods and healthcare waste. All hazardous waste has to be treated in specialist facilities and so often this waste may travel further than non-hazardous waste to reach the appropriate specialist facility. Figure 17 shows the hazardous waste arisings in the South London Waste Plan area, which are already counted within the commercial and industrial and construction and demolition waste streams. Therefore, in terms of

tonnage, this waste stream has already been accounted for in the household, commercial and industrial and construction and demolition totals but its requirement for specialist facilities has not. Given that the waste generation in South London is small, its projected increase is small, its tonnage is already accounted for and that the small quantity of waste is already being managed by identified specialist facilities, there is no requirement on the South London Waste Plan boroughs to provide any hazardous waste treatment facilities.

Figure 16 Hazardous Waste Arisings at 2021 and 2036 (tonnes per annum)




	2021 Arisings	2036 Arisings
Croydon	9,008	9,193
Kingston	2,404	2,432
Merton	4,591	4,685
Sutton	5,239	5,303
TOTAL	21,242	21,612

Wastewater

5.20 Thames Water Limited is responsible for wastewater and sewage sludge treatment in London and manages the sewerage infrastructure as well as the sewage treatment works. Figure 18 shows Thames Water’s relatively small projected increase in wastewater treatment and sludge volume between 2020 and 2035.

Figure 17 Wastewater and Sludge Generation at 2020 and 2035



	2020		2035	
	Wastewater treated (m ³ /year)	Sludge (total dissolved solids/year)	Wastewater treated (m ³ /year)	Sludge (total dissolved solids/year)
Croydon	11,79,642	6,309	11,570,942	6,552
Kingston	10,938,459	5,429	11,378,691	5,666
Merton	9,657,944	5,685	10,240,412	6,059
Sutton	21,113,960	11,547	22,545,500	12,366
TOTAL	52,890,205	28,970	55,735,545	30,643

- 5.21 The four boroughs are served by Beddington (LB Sutton), Crossness (LB Bexley), Hogsmill (RB Kingston) and Long Reach (Dartford BC) sewage treatment works. Thames Water has informed the South London Waste Plan boroughs that these works all have adequate capacity to manage the incoming sewage and have all had major capacity increases recently. Between 2020 and 2025, Thames Water plans general capital maintenance projects and, specifically at the Hogsmill Sewage Treatment Works, biodiversity enhancements and a replacement to the combined heat and power plant.
- 5.22 Therefore, in accordance with national planning practice guidance, the 2019 ItP London Plan and this plan's objectives:



WP2 Strategic Approach to Other Forms of Waste

- (a) The boroughs of the South London Waste Plan will work with the waste management industry to continue to develop efficient and more effective management eliminating the need for additional waste capacity.
- (b) During the lifetime of the plan, the boroughs of the South London Waste Plan will seek to meet the forecast arisings for Construction and Demolition waste of managing 420,275 tonnes per annum within their boundaries across the plan period to 2036. The boroughs of the South London Waste Plan will deliver this by safeguarding existing waste sites and encouraging the intensification of these sites as appropriate (see Policy WP3)
- (c) Temporary sites for the deposit of Excavation Waste will be supported where they are for beneficial use and subject to Policy WP5
- (d) New sites (either transfer or management) will not be supported for Radioactive Waste, Agricultural Waste and Hazardous Waste.
- (e) Development for improvements to the operation of and the enhancement of the environment of the Hogsmill Sewage Treatment Works and the Beddington Sewage Treatment Works will be supported, subject to the other policies in this South London Waste Plan and the relevant borough's Development Plan.

WP3 Safeguarding of Existing Waste Sites

Safeguarding

5.23 In order to preserve the existing capacity, the South London Waste Plan boroughs will safeguard all the existing waste sites, set out on Pages 44-91, for waste uses and these will be shown on the boroughs' Policies Map.

Intensification on Safeguarded Sites

5.24 In order to use land efficiently and to ensure the viability of existing businesses, the South London Waste Plan boroughs will allow the intensification of uses, as appropriate, on the safeguarded sites to allow a greater throughput on the site. However, this will have to be considered against all the relevant policies in a borough's Development Plan. For example, while a redevelopment to increase capacity may be desirable in terms of meeting the target, it may not be desirable with regard to the additional strain that is placed on the local road network. Similarly, the South London Waste Plan boroughs will be supportive of businesses which are attempting to increase the waste management element of Waste Transfer Stations but any development associated with an increase in the waste management element of Waste Transfer Stations will have to comply with all the policies in a borough's Development Plan.



Compensatory Provision

5.25 The 2019 ItP London Plan states "waste sites should only be released to other land uses where processing capacity is re-provided elsewhere in London, based on the maximum achievable throughput of the site proposed to be lost. When assessing the throughput of a site, the maximum throughput achieved over the last five years should be used, where this is not available potential capacity of the site should be appropriately assessed" (paragraph 9.9.2). The evidence base supporting the economic policies in the 2019 ItP London Plan clearly demonstrates that the South London Waste Plan area has exceptional demand for business and industrial land from non-waste uses. Due to this the evidence also indicates that Croydon, Kingston and Merton should not release industrial land and that Sutton should provide more industrial capacity. As South London is already providing 13% more waste management capacity than waste arising in the south London area, the South London Boroughs have to carefully consider the balance of demand for further waste uses with the demand for other business and industrial enterprises to ensure a diverse and robust business base.

Waste Hierarchy

5.26 Planning Practice Guidance (Paragraph: 009 Reference ID: 28-009-20141016) states that “driving waste up the Waste Hierarchy is an integral part of the national waste management plan for England and national planning policy for waste. All local planning authorities must have regard to the Plan and national policy in preparing their Local Plans.” In other words, this entails ensuring waste that can be recycled is not used as fuel, ensuring waste that can be re-used is not recycled and, reducing the amount of waste produced in the first place. In practice, though, there may be occasions where the nature of a waste facility means waste operations cannot easily rise up the waste hierarchy by intensification.

5.27 Therefore, in accordance with this plan’s objectives:



WP3 Existing Waste Sites

Safeguarding

(a) The sites set out on Pages 44-91 of this South London Waste Plan will be safeguarded for waste uses or waste/mineral uses only.

Intensification

(b) The intensification of use of a safeguarded waste site, measured by the increase of tonnes of waste managed per annum, will be supported, subject to the other policies in this South London Waste Plan and the relevant borough’s Development Plan.

Safeguarding Compensatory Provision

(c) Compensatory provision for the loss of an existing safeguarded waste site will be required with the level of compensatory provision necessary to be considered on a case-by-case basis. The list of safeguarded sites will be updated with any compensatory sites in the Sutton Authority Monitoring Report and the compensatory sites will be safeguarded for waste uses only.

(d) Compensatory provision for the loss of a waste site outside the South London Waste Plan area will not be permitted.

Safeguarding Waste Hierarchy

(e) Any development on an existing safeguarded waste site will be required to result in waste being managed at least to the same level in the waste hierarchy as prior to the development.

WP4 Sites for Compensatory Provision

5.28 As set out in Policy WP1, the South London Waste Plan expects no new sites for waste use except where they are required for compensatory provision. The location of compensatory sites must be carefully considered.

5.29 Policy SI18 of the 2019 ItP London Plan suggests that Strategic Industrial Locations and Locally Significant Industrial Locations are suitable locations, while Appendix B of the National Planning Policy for Waste (October 2014) provides further information on locational criteria for waste treatment facilities.



5.30 Therefore, in accordance with the National Planning Policy for Waste, the 2019 ItP London Plan and this plan's objectives:

WP4 Sites for Compensatory Provision

Proposals for new waste sites to provide compensatory provision should:

- (a) Demonstrate that the site is capable of providing sufficient compensatory capacity.
- (b) Be located on sites:
 - (i) within Strategic Industrial Locations or Locally Significant Industrial Locations;
 - (ii) not having an adverse effect on nature conservation areas protected by international or national regulations;
 - (iii) not containing features or have an adverse effect on features identified as being of international or national historic importance; and,
 - (iv) not having an adverse effect on on-site or off-site flood risk. Proposals involving hazardous waste will not be permitted within Flood Zones 3a or 3b.
- (c) Consider the advantages of the co-location of waste facilities with the negative cumulative effects of a concentration of waste uses in one area;
- (d) Have particular regard to sites which:
 - (i) do not result in visually detrimental development conspicuous from strategic open land (eg Green Belt or Metropolitan Open Land);
 - (ii) are located more than 100 metres from open space;
 - (iii) are located outside Groundwater Source Protection Zones (ie sites farthest from protected groundwater sources);
 - (iv) have access to sustainable modes of transport for incoming and outgoing materials, particularly rail and water, and which provide easy access for staff to cycle or walk;
 - (v) have direct access to the strategic road network;
 - (vi) have no Public Rights of Way crossing the site;
 - (vii) do not adversely affect regional and local nature conservation areas, conservation areas and locally designated areas of special character, archaeological sites and strategic views;
 - (viii) offer opportunities to accommodate various related facilities on a single site;
- (e) Include appropriate mitigation measures which will be considered in assessing site suitability;
- (f) Meet the other policies of the relevant borough's Development Plan.



WP5 Protecting and Enhancing Amenity

- 5.31 Waste facilities have the potential to generate a large number of amenity issues especially in an area as diverse as the plan area which includes urban, suburban and semi-rural built environments. The issues include effects on the built and historic environment, encroachment into open space, flood risk, harm to biodiversity, water quality and unacceptable emissions into the air (both from the plant itself and the traffic movements generated), unacceptable noise and vibration (both from the plant and traffic), litter and vermin and bird population increase.
- 5.32 Waste developments should be well designed and managed to ensure that amenity impacts can be mitigated or prevented. These may be addressed on an ongoing basis through conditions imposed by planning permissions that are granted by planning authorities and environmental permits that are regulated by the Environment Agency. The National Planning Policy for Waste (Paragraph 7) directs waste planning authorities to “concern themselves with implementing the planning strategy in the Local Plan and not with the control of processes which are a matter for the pollution control authorities. Waste planning authorities should work on the assumption that the relevant pollution control regime will be properly applied and enforced”
- 5.33 The National Planning Policy Guidance (Paragraph: 050 Reference ID: 28-050-20141016) advises planning authorities that “before granting planning permission they will need to be satisfied that these issues can or will be adequately addressed by taking the advice from the relevant regulatory body.” Consequently, in the consideration of waste facility applications, each borough will seek advice from the Environment Agency and other agencies as appropriate. In addition, developers are encouraged to contact the appropriate partner borough, the Environment Agency and Natural England prior to submission of an application to discuss all relevant matters and to engage in early public consultation on a proposal.
- 5.34 Waste developments should be designed paying particular attention to how the design of a facility can enhance the local environment and mitigate amenity issues. For instance, waste activities should be within a fully enclosed and covered building and the impact may be further limited by considering setting, hard and soft landscaping, height, bulk and massing, detailing, materials, lighting and boundary treatments.
- 5.35 Therefore, in accordance with the National Planning Policy for Waste and this plan’s objectives:

WP5 Protecting and Enhancing Amenity

- (a) Developments for compensatory or intensified waste facilities should ensure that any impacts of the development are designed and managed to achieve levels that will not significantly adversely affect people and the environment.
- (b) The parts of a waste facility site where unloading, loading, storage and processing takes place should be within a fully enclosed covered building.
- (c) Particular regard will be paid to the impact of the development in terms of:
- (i) The Green Belt, Metropolitan Open Land, recreation land or similar;
 - (ii) Biodiversity, including ensuring that development does not harm nature conservation areas protected by international and national regulations as well as ensuring regional and local nature conservation areas are not adversely affected;
 - (iii) Archaeological sites, the historic environment and sensitive receptors, such as schools, hospitals and residential areas;
 - (iv) Groundwater, surface water and watercourses;
 - (v) Air emissions, including dust, arising from the on-site operations, plant and traffic generated;
 - (vi) Noise and vibration from the plant and traffic generated;
 - (vii) Traffic generation, access and the suitability of the highway network in the vicinity, including access to and from the strategic road network and the possibility of using sustainable modes of transport for incoming and outgoing materials;
 - (viii) The safety and security of the site
 - (ix) Odour, litter, vermin and birds; and,
 - (x) The design of the waste facility, particularly:
 - complementing or improving the character of an area;
 - limiting the visual impact of the development by employing hard and soft landscaping and minimising glare;
 - being of a scale, massing or height appropriate to the townscape or landscape;
 - using good quality materials;
 - minimising the requirement for exterior lighting; and,
 - utilising high-quality boundary treatments.

The information in the schedule below will provide the basis for the assessment of the impact of a development.



Schedule: Information which may be required for a planning application

- 1 Type(s) of waste to be managed at the site, e.g. CD&E and C&I.
- 2 Estimated annual throughput of each type of waste materials and timescale of operations for the current proposals and the estimated maximum capacities for the site, if different.
- 3 Estimated capacity of the site
- 4 Method of working. The annual throughput per treatment method, e.g. Transfer, MRF, AD.
- 5 Markets to be served
- 6 Present use, conditions and ground levels of the site and its surroundings.
- 7 Site layout, means of access, the design and siting of buildings and fixed and mobile machinery to be used
- 8 Hours of operation
- 9 Statement of Community Involvement
- 10 Preliminary BREEAM and/or CEEQUAL assessment, a commitment to submit a design stage certificate before construction can start on site and to undertake a post-construction review
- 11 Energy Assessment, including an assessment of energy demand and CO2 emissions
- 12 Assessment of the impact of the proposed development on the built and historic environment
- 13 Archaeological evaluation
- 14 Landscape assessment and landscaping proposals, including screening, landscaping works and boundary treatments
- 15 Tree Survey/Arboricultural Report
- 16 Biodiversity Assessment would be required where proposals are likely to affect nature conservation areas such as a: National or Local Nature Reserve, Site of Special Scientific Interest, Special Area of Conservation, Special Protection Area, Site of Metropolitan, Borough or Local Importance for Nature Conservation, or Green Corridors.
- 17 Topographical Survey
- 18 Geological Assessment
- 19 Hydrological and hydrogeological assessment
- 20 Flood Risk Assessment
- 21 Site drainage details





- 22 Air Quality Impact Assessment, demonstrating the effects on air quality in the locality of a proposed site arising from the operation of the site and vehicles movements to and from it.
- 23 An assessment identifying nuisances (eg odours, dust and fumes) likely to affect nearby receptors and which identifies the mitigation measures to be used to minimise the effects of those nuisances.
- 24 Noise Impact Assessment
- 25 Sustainability Statement
- 26 Circular Economy Statement
- 27 Job creation details, including skills, training and apprentice opportunities
- 28 TV and Radio Reception Impact Assessment
- 29 Measures to prevent new or increased risk to aviation from the proposed development
- 30 Measures for protecting Public Rights of Way
- 31 Transport Assessment
- 32 Travel Plan
- 32 Route Management Strategy
- 33 Access Strategy
- 34 Delivery Servicing Plan/Freight Plan
- 35 Construction Logistics Plan
- 36 Highway safety measures
- 37 Design and Access Statement
- 38 Restoration, after care, after use and long-term management provision
- 39 An Environmental Impact Assessment may also be required under the Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999.
- 40 A Habitats Regulations Assessment, if the relevant borough and Natural England consider it may affect a European-designated site. European sites which may be affected are:
 - The Richmond Park SAC
 - The Wimbledon Common SAC
 - The Mole Gap to Reigate Escarpment SAC
 - The Ockham and Wisley Commons SSSI (part of the Thames Basin Heaths SPA)
- 41 Any other requirements from the relevant borough's Validation List

WP6 Sustainable Design and Construction of Waste Facilities

- 5.36 A well-designed and managed waste facility should be designed to be sustainable both in construction and future operation. "Designing Waste Facilities - A Guide to Modern Design in Waste" (DEFRA, 2008) states: "There are two aspects of climate change that need to be considered by prospective developers of new waste facilities. First, how will the proposals impact upon the process of climate change through carbon emissions? Second, how will the development be affected as a consequence of the effects of climate change?" In addition, Policy S12 of the 2019 ItP London Plan provides guidance on how to minimise greenhouse gas emissions and Policy GG6 seeks to ensure that sites are adapted to be resilient against the effects of climate change.
- 5.37 In terms of standards, the Building Research Establishment (BRE) has two standards for rating the overall environmental and sustainability performance of non-residential developments: (1) BREEAM for non-residential buildings; and (2) CEEQUAL for infrastructure projects. In both cases, developments are rated: Outstanding, Excellent, Very Good, Good, Pass and Unclassified. Developers should consider their development and choose the most appropriate standard(s) for their proposed development or whether both are required. If developers use BREEAM, there is no specific scheme for waste facilities, in which developers should liaise with the BRE to identify a suitable 'bespoke' BREEAM scheme to suit the particular characteristics of the proposed development. If developers use CEEQUAL, they should be able to use the general CEEQUAL assessment. In both standards, a rating of Excellent should be achievable.
- 5.38 The reduction of carbon emissions is a key element of both schemes and, in this respect, the 2019 ItP London Plan sets out that all major developments should be net zero carbon, including a minimum on-site reduction of at least 35% beyond building regulations 2013 (or equivalent).
- 5.39 Developers should also consider climate change adaptation measures in schemes. "Designing Waste Facilities - A Guide to Modern Design in Waste" also highlights a number of climate change impacts on waste facilities which should also be considered. These comprise:
- **Odours.** With temperature increases, waste will need to be treated more quickly and unenclosed waste facilities will become particularly vulnerable to odour issues.
 - **Heating, Cooling and Energy Use.** Ideally, the layout of a building should take advantage of the benefits of landscaping for summertime shading and minimising of heat loss in winter. In addition, external cladding materials should be high mass (e.g. brick or concrete) as they release heat slowly.
 - **Flood Readiness.** Flood mitigation measures proposed should be designed to consider the risk both to and from the development over its planned lifetime. Facilities should have a drainage system to cope with more frequent high levels of rainfall. This system should include Sustainable Drainage Systems (SuDS), green roofs and walls, soakaways and permeable pavements and parking areas.
 - **Soil Subsidence.** The wetting and drying effect on soil may cause subsidence. Developers may need to consider deeper foundations or piling. Root barriers may be required depending on surrounding vegetation.
 - **Property Damage.** Higher wind speeds leading to structural damage, more intense rain leading to water infiltration and higher peak temperatures leading to blistering, warping and softening may affect the design of a building and the choice of materials.



- 5.40 In the construction phase of any development, consideration should be given to recycling Construction, Demolition and Excavation Waste on-site as this is the most sustainable approach to dealing with this form of waste. However, the boroughs are aware that this is not always feasible.
- 5.41 Therefore in accordance with national and regional advice, the 2019 ItP London Plan (including the Mayor of London's Sustainable Design and Construction SPG, 2014) and this plan's objectives:

WP6 Sustainable Construction and Design of Waste Facilities

- (a) Waste development must achieve a sustainability rating of 'Excellent' under a bespoke BREEAM scheme and/or CEEQUAL scheme. A lower rating may be acceptable where the developers can demonstrate that achieving the 'Excellent' rating would make the proposal unviable. In addition, all proposals must comply with any other relevant policies of the relevant borough's Development Plan.
- (b) Waste facilities will be required to:
- (i) minimise on-site carbon dioxide emissions in line with 2019 ItP London Plan Policy SI2;
 - (ii) be fully adapted and resilient to the future impacts of climate change in accordance with 2019 ItP London Plan Policy GG6 , particularly with regard to increased flood risk, urban heat island/heatwaves, air pollution, drought conditions and impacts on biodiversity;
 - (iii) incorporate green roofs, sustainable drainage systems (SuDS) including rainwater harvesting and other blue and green infrastructure measures as appropriate in accordance with 2019 ItP London Plan Policy G5;
 - (iv) make a more efficient use of resources and reduce the lifecycle impacts of construction materials;
 - (v) minimise waste and promote sustainable management of construction waste on site; and,
 - (vi) protect, manage and enhance local habitats and biodiversity.

WP7 The Benefits of Waste

5.42 The 2008 Climate Change Act (as amended) sets a target to make the UK net zero carbon by 2050. In addition to societal changes, waste facilities have a major role to play in achieving the target and can contribute to the circular economy.

Reuse, Refurbishment, Recycling and By-products

5.43 Therefore, the South London Waste Plan boroughs will encourage waste treatment applications that can lead to a prolonged product life (reuse and refurbishment), can provide secondary materials (remanufacture) or produce by-products, such as biogas from composting and refuse derived fuel and providing cooling, heat and power.

Energy from Waste

5.44 In the London Environment Strategy (Objective 7.4), the Mayor of London states that “achieving reduction and recycling targets will mean that no new energy from waste facilities in London will be needed.” Therefore, the South London Waste Plan boroughs will not expect a proposal for such a facility to be submitted.

Job Creation and Social Value

5.45 Although the South London Waste Plan boroughs have relatively high employment rates overall, there are pockets of the four boroughs where employment is lower. The intensification of existing waste sites provides an opportunity for increased employment, often within a low employment hotspot. Therefore, the South London Waste Plan boroughs would welcome information on how the intensification may generate additional employment.

5.46 Therefore, in accordance with the 2019 ItP London Plan, London Environment Strategy and this plan’s objectives:

WP7 The Benefits of Waste

- (a) Waste development for the intensification of sites, which involve the reuse, refurbishment, remanufacture of products or the production of by-products, will be encouraged.
- (b) Waste development for additional Energy from Waste facilities will not be supported
- (c) Waste development for the intensification of sites should seek to result in sub-regional job creation and resulting social benefits, including skills, training, and apprenticeship opportunities.



WP8 Nearby New Development Affecting Waste Sites

- 5.47 All existing waste sites have strict controls imposed on them whether it be through planning conditions or the Environment Agency permitting regime. However, as an industrial activity, they have the potential to do some harm to sensitive land uses located near to them. Consequently, there is the issue of who has the responsibility of mitigating the impact of nuisances: The existing waste site or a new, proposed sensitive land use, such as residential development.
- 5.48 The National Planning Policy Framework (para 182) and the 2019 ItP London Plan (Policy D13) make it clear that where the operation of an existing business could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or agent of change) should be required to provide suitable mitigation before the completion of the new development.
- 5.49 In the South London Waste Plan area, the conflict between existing waste sites and a proposed, new sensitive land use is unlikely to occur because the existing waste sites are generally in industrial areas and are surrounded by non-sensitive land uses. Nevertheless, the South London Waste Plan boroughs consider, for clarity, a policy setting out who is responsible for the mitigation of any conflict is required.
- 5.50 Therefore, in accordance with the National Planning Policy Framework, the 2019 ItP London Plan and this plan's objectives:

WP8 New Development Affecting Waste Sites

- (a) New development should be designed to ensure that existing waste sites and sites developed for compensatory provision remain viable and can intensify without unreasonable restrictions being placed on them.
- (b) Where new development is proposed that may be affected by an existing waste site, an extant scheme, a permission for additional capacity or a site developed for compensatory provision, the applicant should:
 - (i) Ensure that good design mitigates and minimizes existing and potential nuisances generated by the waste use, either existing, extant, a permission for additional capacity or developed for compensatory provision
 - (ii) Explore mitigation measures early in the design stage, with the necessary and appropriate provisions, including the ongoing and future management of mitigation measures, secured through planning conditions and obligations



WP9 Planning Obligations

- 5.51 Planning Obligations, or Section 106 agreements, are legal agreements negotiated between local authorities and developers or unilateral undertakings made by developers. The use of planning obligations will be in line with the prevailing legislation and guidance and the policies of the relevant borough.
- 5.52 In all cases, the boroughs in the plan area will try to use a planning condition to make a proposed development acceptable before resorting to a planning obligation. However, there may be situations where the use of planning conditions is not possible. The following are examples of where a planning obligation may be considered:
- Traffic management measures, including the routing of vehicles; supporting staff to travel sustainably; improving road safety; reducing freight traffic, particularly at peak times
 - Access and highway improvements
 - Provision of infrastructure, including low carbon and decentralised energy networks
 - Carbon offsetting contributions
 - Protection of sites of international, national, regional or local importance
 - Environmental enhancement
 - Flood risk compensation works
 - Archaeological investigation, recording and keeping of artefacts and safeguarding of remains
 - Off-site monitoring of emissions and the water environment
 - Provision and management of off-site or advance planting and screening
 - Job brokerage, training and skills to encourage local employment opportunities.
- 5.53 In addition, dependent on the relevant borough's Community Infrastructure Levy (CIL) Charging Schedule, a waste development may be CIL-liable.



WP9 Planning Obligations

Planning obligations will be used to ensure that all new waste development or waste redevelopment meets on- and off-site requirements that are made necessary by, and are directly related to, any proposed development and are reasonably related in scale and kind to the development.

WP10 Monitoring and Contingencies

- 5.54 The South London Waste Plan boroughs recognize that on-going plan monitoring and review are essential to:
- delivering the objectives of the plan
 - assessing the implementation of the strategic policies
 - analysing the effectiveness of policies
- 5.55 In order to ensure plan monitoring is carried out comprehensively, the South London Waste Plan boroughs have created a Monitoring and Contingency Table (Appendix 1) which will measure the progress being made in meeting the strategic objectives. The reporting of the indicators and targets in the Monitoring and Contingencies Table will take place through the London Borough of Sutton's Authority Monitoring Report which is produced annually.
- 5.56 In order to ensure the South London Waste Plan is flexible and can deal with changing circumstances, the boroughs have identified a number of possible risks and constraints to delivery and have set out contingency plans to address these risks. Monitoring will provide the basis on which a contingency within the South London Waste Plan would be triggered. In any event, Paragraph 33 of the National Planning Policy Framework requires that the plan is reviewed every five years.

WP10 Monitoring and Contingencies

The South London Waste Plan boroughs will monitor and review the effectiveness of the plan in meeting its strategic objectives, policies and targets through the Monitoring and Contingency Table (Appendix 1). The London Borough of Sutton's Authority Monitoring Report will report the monitoring and the boroughs, in consultation with each other, will decide whether it is necessary to implement any of the contingency actions in light of the monitoring.





How to read the information on Safeguarded Sites

Site size: in hectares

Type of facility: usually derived from the type of permit granted. There are three types of waste facilities: **(i)** a waste management facility, which reuses, recycles or reprocesses waste and therefore its throughput can count towards the south London target; **(ii)** a waste transfer facility, which processes or sorts waste for management elsewhere. In practice, however, most transfer stations do some management and, where this management capacity is known, it is counted towards the south London target; **(iii)** a waste treatment facility is a general term covering both waste management and waste transfer facilities

Type of waste accepted: from the following types: **(i)** household, **(ii)** commercial and industrial, **(iii)** local authority collected waste, usually a combination of household and commercial and industrial, **(iv)** construction and demolition, **(v)** excavation, **(vi)** wastewater, or **(vii)** hazardous (eg asbestos, chemicals, oil, electrical goods and some types of healthcare waste)

Maximum throughput (in tonnes per annum): The maximum throughput achieved by the site in any one year between 2013 and 2017. The 2019 ItP London Plan recommends that boroughs should use this measure to assess capacity

Licensed capacity (in tonnes per annum): The maximum capacity for the site from its Environment Agency permit. This is not a reliable guide to capacity as permitted capacities are based on capacity bands into which permits are divided rather than the operating annual capacity of the site, and, therefore, the capacity detailed in the licence tends to be at the top end of the charging bands. Therefore, many sites give permitted capacities of 74,999 tonnes, 24,999 tonnes and 4,999 tonnes and it is likely that such figures used are over estimates of actual operational capacities.

Qualifying throughput (in tonnes per annum): This is the element of the maximum throughput which counts as waste management. For it to count as waste management, it must be applicable to one of the London Plan criteria for waste management: **(i)** used in London for energy recovery; **(ii)** materials sorted or bulked in London facilities for reuse, reprocessing or recycling; **(iii)** materials reused, recycled or reprocessed in London; **(iv)** produced as a solid-recovered fuel or a high-quality refuse-derived fuel

Site Description: A description of the site and its immediate surroundings

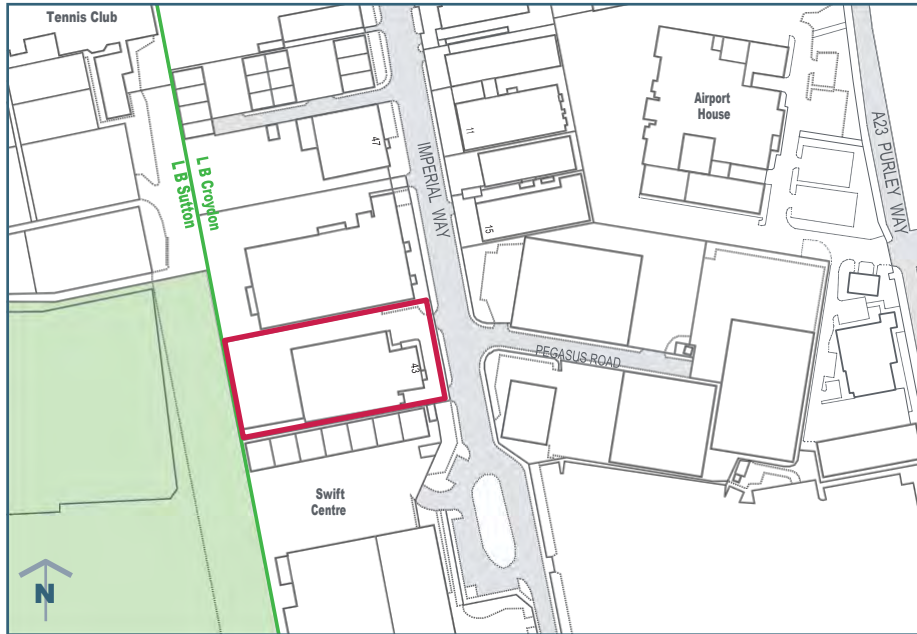
Planning Designations: The principal and relevant designations covering the site from the relevant borough's Policies Map

Currently Safeguarded: If a site was safeguarded in the 2011 South London Waste Plan

Opportunity to increase waste managed: Whether the site has the scope to increase its capacity to manage waste. This may come from increasing throughput through the reconfiguration of the site. It does not include switching from non-waste management activities (such as sorting) to waste management activities (such as recycling).

Issue to consider if there is a further application: The principal issues facing the site if it is redeveloped for additional or a different type of waste treatment. This is unlikely to be the case in most instances. Appendix 1 shows the sites which have been assessed as being able to intensify.

C1 Able Waste Services, 43 Imperial Way, Croydon CR0 4RR



Site size (ha)	0.45
Type of facility	Waste Transfer Station and Treatment
Type of waste	Construction and Demolition
Maximum throughput tonnes per annum (tpa)	46,463
Licensed capacity (tpa)	74,999
Qualifying throughput (tpa)	43,268 (C&D)

Not to Scale

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Site Description Two-storey office block fronting Imperial Way with modern double-height warehouse to rear. The site lies within the Imperial Way Industrial Estate which comprises a mix of new and 1970s warehouses, mostly two-storey.

Planning Designations Strategic Industrial Location
Archaeological Priority Area

Currently Safeguarded No

Opportunity to increase waste managed No. The throughput per hectare is good for this type of facility so it is unlikely that it will be able to intensify operations in its current form.

Issues to consider if there is a further application Developers planning to intensify the safeguarded site should pay particular attention to:

- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Evaluating and preserving any archaeological remains as the site lies within an archaeological priority area – Mere Bank.
- Providing appropriate soft landscaping and regard to the adjacent Roundshaw Park
- Conserving, and where possible enhancing, the setting of Airport House, a Grade II* Listed building opposite

C4 Days Aggregates Purley Depot, Approach Road, Croydon CR8 2AL



Sitesize (ha)	2.0
Type of facility	Waste Transfer Station and Treatment
Type of waste	Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	179,300
Licensed capacity (tpa)	249,999
Qualifying throughput (tpa)	178,593

Not to Scale

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Site Description Rail depot, including railway sidings, aggregates storing, construction and demolition waste recycling plant, concrete batching plant, ancillary office building and enclosed sheds.
The site lies adjacent to Purley rail station and is reasonably isolated from nearby properties

Planning Designations Archaeological Priority Area
Place Specific Policy - Purley District Centre and environs (DM42.1)

Currently Safeguarded No

Opportunity to increase waste managed No. This is a dual-use site, with a minerals operation within the site. If the minerals operations are intensified, the current waste management throughput should continue at the current level.

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
 - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
 - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
 - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
 - Evaluating and preserving any archaeological remains as the site lies within an archaeological priority area – London to Brighton Road
 - Not harming biodiversity in the vicinity
 - Providing appropriate soft landscaping
 - Not prejudicing the minerals operations on site which are a complementary use

C5A Factory Lane Waste Transfer Station, Factory Lane, Croydon CR0 3RL



Site size (ha)	1.2
Type of facility	Transfer Station
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	19,736*
Licensed capacity (tpa)	200,000*
Qualifying throughput (tpa)	0

Not to Scale

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Site Description

A large triple-storey building surrounded by hardstanding. The site is part of a larger industrial area.

The site wraps around a household reuse and recycling centre.

Active gas holders lie to the north-west of the site and power lines are overhead.

* Maximum throughput and licensed capacity figures are for both sites C5A and C5B

Planning Designations

Strategic Industrial Location
Flood Zone 2

Currently Safeguarded

Yes – Site reference in 2011 SLWP: 1

Opportunity to increase waste managed

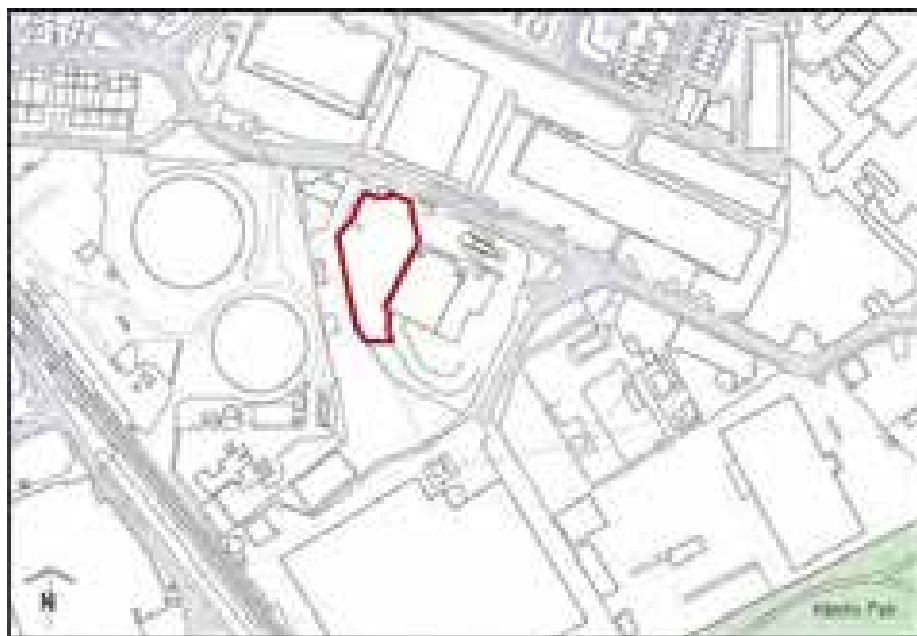
Yes. There are no plans by the South London Waste Partnership to intensify operations at this site. The site is large and there may be an opportunity to co-locate.

Issues to consider if there is a further application

Developers planning to intensify the safeguarded site should pay particular attention to:

- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
- Minimising flood risk on- and off-site
- Evaluating and preserving any remains in the Ampere Way archaeology priority area
- Not harming biodiversity in the vicinity
- Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected

C5B Factory Lane Reuse and Recycling Centre, Factory Lane, Croydon CR0 3RL



Site size (ha)	0.4
Type of facility	Household Waste Amenity Site
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	19,736*
Licensed capacity (tpa)	200,000*
Qualifying throughput (tpa)	9,623 (HCI) 5,206 (C&D)

Not to Scale

© Crown copyright Licence No. 100019285 (2019)

Site Description Open local authority reuse and recycling centre. The site is part of a larger industrial area. A waste transfer site wraps around the household reuse and recycling centre. Active gas holders lie to the north-west of the site and power lines are overhead.
 * Maximum throughput and licensed capacity figures are for both sites C5A and C5B

Planning Designations Strategic Industrial Location
 Flood Zone 2

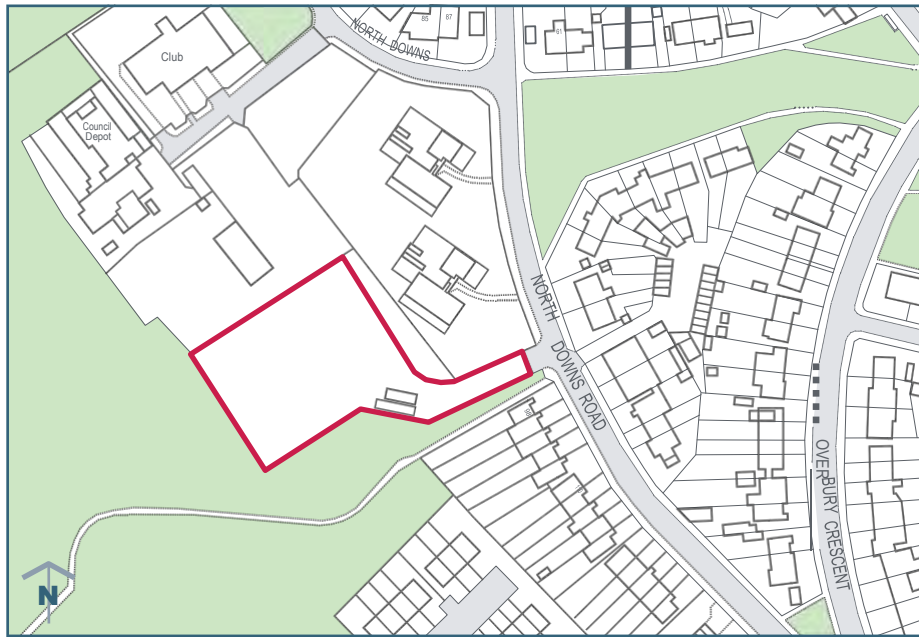
Currently Safeguarded Yes – Site reference in 2011 SLWP: 1

Opportunity to increase waste managed Yes. There are no plans by the South London Waste Partnership to intensify operations at this site. While household reuse and recycling centres have a low throughput per hectare, the site is large and there may be an opportunity to co-locate.

Issues to consider if there is a further application Developers planning to intensify the safeguarded site should pay particular attention to:

- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
- Minimising flood risk on- and off-site
- Evaluating and preserving any remains in the Ampere Way archaeology priority area
- Not harming biodiversity in the vicinity
- Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected

C6 Fishers Farm Reuse and Recycling Centre, North Downs Road, Croydon CR0 0LF



Site size (ha)	0.2
Type of facility	Household Waste Amenity Site
Type of Waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	6,895
Licensed capacity (tpa)	15,125
Qualifying throughput (tpa)	4,542(HCI)

Not to Scale

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Site Description Open local authority household reuse and recycling centre
 Located on the edge of a residential area adjacent to farmland

Planning Designations Archaeological Priority Area

Currently Safeguarded Yes – Site Reference in SLWP 2011:

Opportunity to increase waste managed No. There are no plans to intensify

Issues to consider if there is a further application

Developers planning to intensify the safeguarded site should pay particular attention to:

- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
- Evaluating and preserving any archaeological remains in the Croydon Downs Archaeological Priority Area
- Not harming biodiversity in the vicinity and in particularly the nearby site of nature conservation at Hutchinson’s Bank
- Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected
- Designing a facility that does not impact on the openness of Metropolitan Green Belt
- Providing appropriate soft landscaping

C7 Henry Woods Waste Management, Land adjacent to Unit 9, Mill Lane Trading Estate, Croydon CR0 4AA



Site size (ha)	0.7
Type of facility	Waste Transfer Station and Treatment
Type of waste	Household Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	12,885
Licensed capacity (tpa)	74,999
Qualifying throughput (tpa)	0

Not to Scale

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Site Description Open skip storage and waste sorting
The site lies within an existing strategic industrial area.

Planning Designations Strategic Industrial Area
Archaeological Priority Area

Currently Safeguarded No

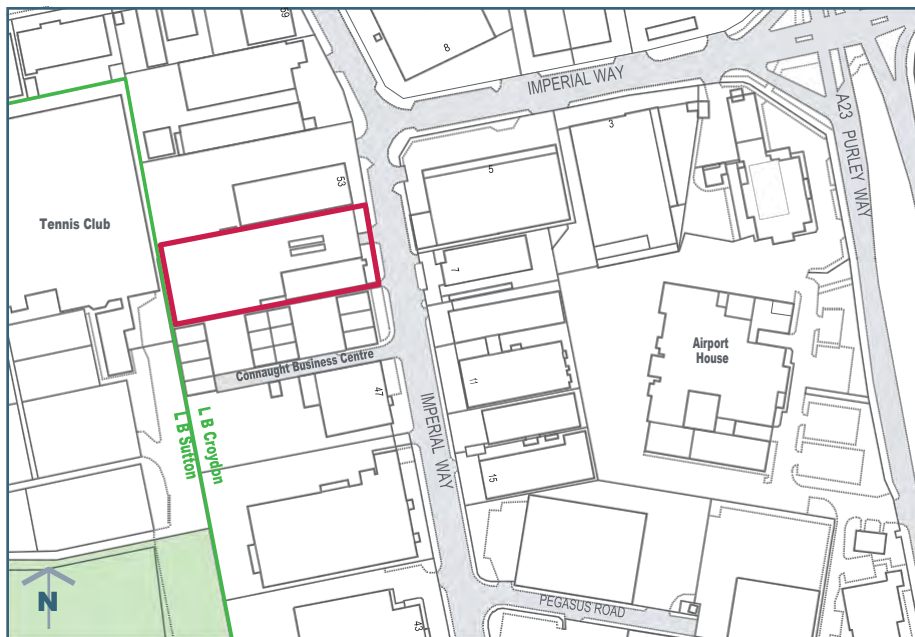
Opportunity to increase waste managed No. This is a very constrained site with no opportunity for expansion or intensification

Issues to consider if there is a further application

Developers planning to intensify the safeguarded site should pay particular attention to:

- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected

C8 New Era Metals, 51 Imperial Way, Croydon CR0 4RR



Not to Scale

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Site size (ha)	0.4
Type of facility	Waste Transfer Station and Treatment
Type of waste	Household Commercial and Industrial (HCI) and Hazardous
Maximum throughput tonnes per annum (tpa)	4,213
Licensed capacity (tpa)	4,999
Qualifying throughput (tpa)	4,213 (HCI)

Site Description

Modern double-height warehouse with adjacent hardstanding area for metal sorting
The site lies within the Imperial Way Industrial Estate, which comprises a mix of new and mid-century warehouses, mostly double height.

Planning Designations

Strategic Industrial Area
Archaeological Priority Area

Currently Safeguarded

No

Opportunity to increase waste managed

No. This site is achieving near its permitted capacity so it is unlikely that there is an opportunity to intensify the site in its current form.

Issues to consider if there is a further application

Developers planning to intensify the safeguarded site should pay particular attention to:

- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Evaluating and preserving any archaeological remains in the archaeological priority area of Mere Bank
- Not harming biodiversity in the vicinity
- Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected
- Providing appropriate soft landscaping
- Conserving, and where possible enhancing, the setting of Airport House, a Grade II* Listed building opposite

C9 Pear Tree Farm, Featherbed Lane, Croydon CR0 9AA



Not to Scale

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Site size (ha)	1.8
Type of facility	Waste Transfer Station
Type of waste	Household Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	37,500
Licensed capacity (tpa)	37,500
Qualifying throughput (tpa)	0

Site Description	Uncovered sorting facility, skip storage area along with vehicle storage and repair Site is within the Green Belt surrounded by farmland
Planning Designations	Green Belt Archaeological Priority Area
Currently Safeguarded	Yes - Site reference in SLWP 2011:5
Opportunity to increase waste managed	No. This site is within the Green Belt and has been refused permission to intensify operations on several occasions on the basis of harm to the Green Belt and character and appearance of the area. Therefore this site is not suitable for intensification.
Issues to consider if there is a further application	<p>Developers planning to intensify the safeguarded site should pay particular attention to:</p> <ul style="list-style-type: none"> • Designing the site so that operations are carried out within a fully enclosed building • Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site • Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads • Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts • Protecting the amenity of those using the nearby open spaces • Evaluating and preserving any archaeological remains as the site is in the archaeological priority area - Croydon Downs • Minimising flood risk on- and off-site • Not harming biodiversity in the vicinity • Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected • Designing a facility that does not impact on the openness of Metropolitan Green Belt • Providing appropriate soft landscaping

C10 Purley Oaks Reuse and Recycling Centre, Brighton Road, Croydon CR8 2BG



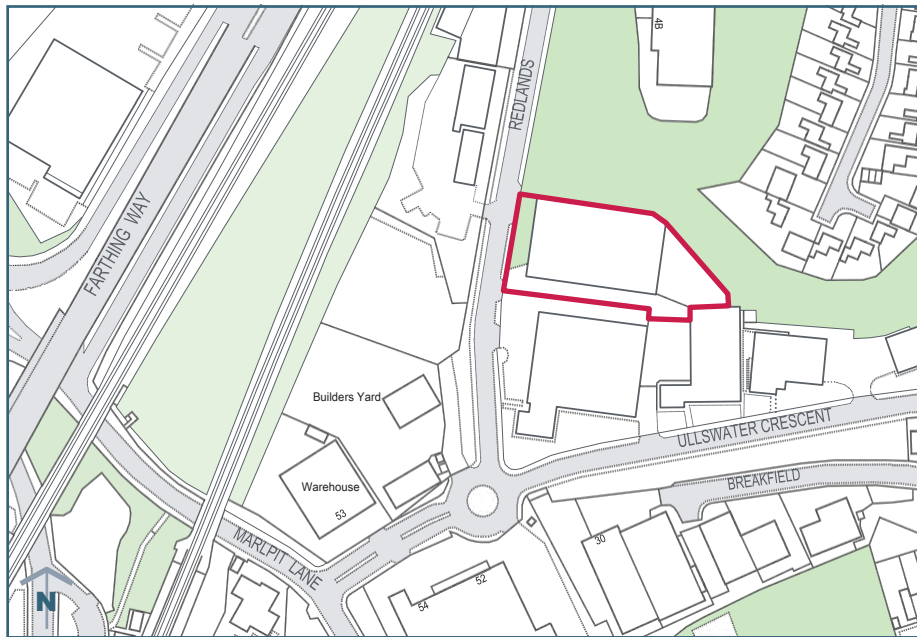
Not to Scale

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Site size (ha)	0.2
Type of facility	Household Waste Amenity Site
Type of waste	Household Commercial and Industrial (HCI) and Hazardous
Maximum throughput tonnes per annum (tpa)	9,099
Licensed capacity (tpa)	12,535
Qualifying throughput (tpa)	6,684 (HCI)

Site Description	Open local authority reuse and recycling centre. Located within a local centre with nearby residential development.
Planning Designations	Place Specific Policy - Area of the junction of Brighton Road and Purley Downs Road (DM42.3) Archaeological Priority Area Flood Zone 3
Currently Safeguarded	Yes – Site reference in SLWP 2011: 4
Opportunity to increase waste managed	No. The site is adjacent to the proposed Site DM42.3 for a Gypsy and Traveller site so there is no capacity to expand
Issues to consider if there is a further application	<p>Developers planning to intensify the safeguarded site should pay particular attention to:</p> <ul style="list-style-type: none"> ● Designing the site so that operations are carried out within a fully enclosed building ● Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site ● Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads ● Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts ● Evaluating and preserving any archaeological remains in the archaeology priority area London to Brighton Roman Road ● Not harming biodiversity in the vicinity ● Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected ● Providing appropriate soft landscaping ● The Purley Oaks Highway Depot is an allocated Gypsy and Traveller site in the Croydon Local Plan 2018

C11 SafetyKleen, Unit 6b, Redlands, Coulsdon, Croydon CR5 2HT



Site size (ha)	0.3
Type of facility	Transfer
Type of waste	Hazardous
Maximum throughput tonnes per annum (tpa)	Not operational
Licensed capacity (tpa)	12,782
Qualifying throughput (tpa)	0

Not to Scale

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Site Description Large two- and three-storey mid-century office and warehouse block with some hardstanding for vehicles at rear
 The site lies within an industrial area with similar adjacent uses. To the east, there is a residential area with a buffer of green space and trees between.

Planning Designations Strategic Industrial Location

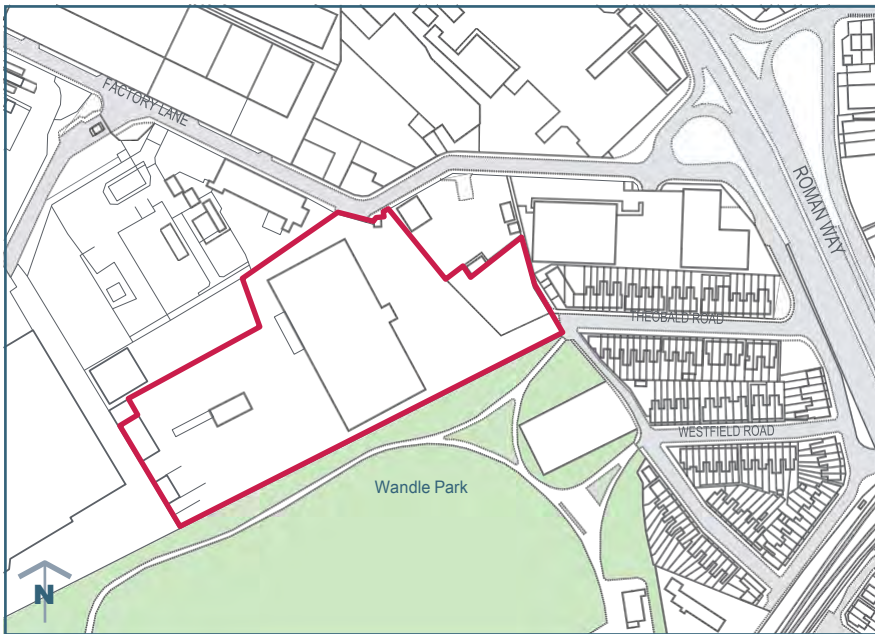
Currently Safeguarded Yes – Site reference in SLWP 2011: A

Opportunity to increase waste managed Yes. The site is currently vacant waste site and so there is an opportunity to add throughput to the apportionment total

Issues to consider if there is a further application Developers planning to intensify the safeguarded site should pay particular attention to:

- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts

C12 Stubbs Mead Depot, Factory Lane, Croydon CR0 3RL



Not to Scale

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Site size (ha)	2.7
Type of facility	Treatment
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	24,383
Licensed capacity (tpa)	Unknown
Qualifying throughput (tpa)	0

Site Description

Large double-height shed with associated circulation. The site lies within an industrial area with similar adjacent uses. To the south, there is Wandle Park and to the east some residential properties are relatively nearby

Planning Designations

Strategic Industrial Location
Place Specific Policy – Site Allocations in Waddon (DM49.2)
Flood Zones 2 and 3

Currently Safeguarded

Yes – Site reference in SLWP 2011: B

Opportunity to increase waste managed

Yes. The site had some throughput in the past but has not registered a return since 2015.

Issues to consider if there is a further application

- Developers planning to intensify the safeguarded site should pay particular attention to:
- Croydon Local Plan site allocation of the site (page 452)
 - Designing the site so that operations are carried out within a fully enclosed building
 - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
 - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
 - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
 - Protecting the amenity of those using the nearby Wandle Park
 - Minimising flood risk on- and off-site
 - Evaluating and preserving any archaeological remains
 - Not harming biodiversity in the vicinity
 - Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected

C13 Solo Wood, Factory Lane, Croydon CR0 3RL



Site size (ha)	.02
Type of facility	Wood Recycling
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	Unknown
Licensed capacity (tpa)	5,000
Qualifying throughput (tpa)	5,000 (HCI)

Not to Scale

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Site Description Single-storey building and open storage. The site is part of a larger industrial area. A waste transfer site and a household reuse and recycling centre adjoins the site. Active gas holders lie to the north-west of the site and power lines are overhead.

Planning Designations	Strategic Industrial Location Flood Zone 2
Currently Safeguarded	Yes – Site reference in 2011 SLWP: 1
Opportunity to increase waste managed	No. The site is small and has little scope for intensification.

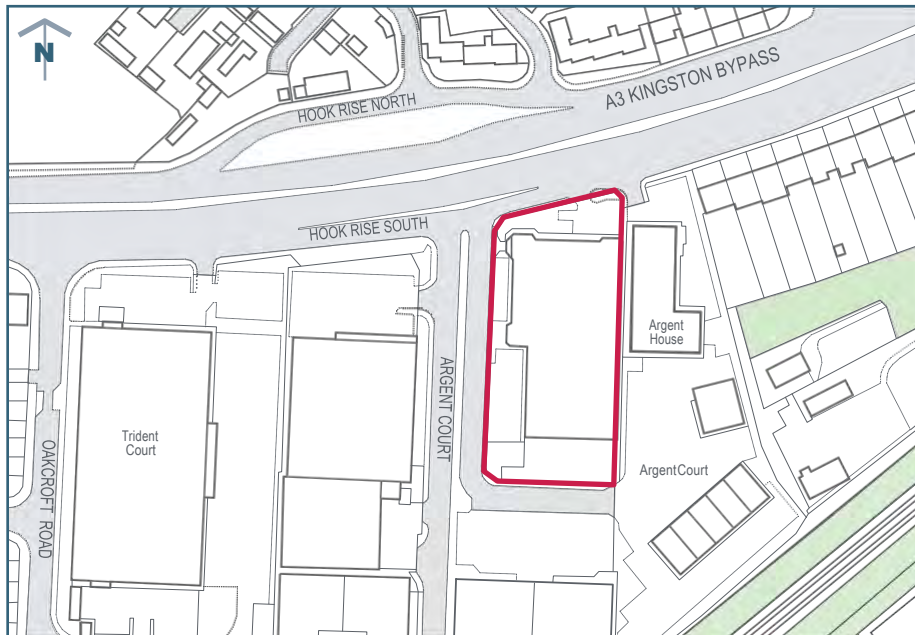
Issues to consider if there is a further application

Developers planning to intensify the safeguarded site should pay particular attention to:

- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
- Minimising flood risk on- and off-site
- Evaluating and preserving any remains in the Ampere Way archaeology priority area
- Not harming biodiversity in the vicinity
- Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected



K2 Genuine Solutions Group, Solutions House, Unit 1A, 223 Hook Rise South, Kingston KT6 7LD



Not to Scale

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Site size (ha)	0.3
Type of facility	Recycling and Reuse
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	1,630
Licensed capacity (tpa)	74,999
Qualifying throughput (tpa)	1,630 (HCI)

Site Description Two-storey office block fronting a large industrial shed to the rear. Hardstanding for vehicles to the rear
 In an industrial area surrounded by similar large industrial sheds. Fronting onto Hook Rise South, beyond which is the Kingston bypass.

Planning Designations Strategic Industrial Location
 Archaeological Priority Area

Currently Safeguarded No

Opportunity to increase waste managed No. This type of facility typically has a lower throughput per hectare, so it is unlikely that there is an opportunity to intensify operations at this site in its current form.

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
 - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
 - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
 - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
 - Protecting the amenity of those using the nearby Tolworth Recreation Ground, King George’s Field, Tolworth Court Farm Fields and Corinthian Casuals Football Club
 - Evaluating and preserving any archaeological remains
 - Not harming biodiversity in the vicinity
 - Providing appropriate soft landscaping

K3 Kingston Reuse and Recycling Centre, Chapel Mill Road, off Villiers Road, Kingston KT1 3GZ



Site size (ha)	0.7
Type of facility	Household Waste Amenity Site
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	14,363
Licensed capacity (tpa)	25,000
Qualifying throughput (tpa)	9,392 (HCI)

Not to Scale

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Site Description Enclosed local authority reuse and recycling centre
The site lies within an industrial area which is surrounded by open space. The Kingston Waste Transfer Station is within the same site.

Planning Designations Locally Significant Industrial Site Area of Archaeological Significance

Currently Safeguarded Yes. Site reference in SLWP 2011: 6

Opportunity to increase waste managed No. There are no plans by the South London Waste Partnership to intensify or upgrade operations at this site.

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
 - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
 - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
 - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
 - Protecting the amenity of those using the nearby Athelstan Recreation Ground, Kingsmeadow, Kingstonian Football Club Ground and Hogsmill Nature Reserve
 - Minimising flood risk on- and off-site
 - Evaluating and preserving any archaeological remains
 - Not harming biodiversity in the vicinity
 - Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected
 - Providing appropriate soft landscaping

K4 Kingston Waste Transfer Station, Chapel Mill Road, off Villiers Road, Kingston KT1 3GZ



Site size (ha)	1.3
Type of facility	Transfer Station
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	68,883
Licensed capacity (tpa)	200,500
Qualifying throughput (tpa)	19,620 (HCI)

Not to Scale

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Site Description	Double-height enclosed shed with hardstanding for vehicles. The site lies within an industrial area which is surrounded by open space. The Kingston Civic Amenity Site is within the same site.	
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Planning Designations	Locally Significant Industrial Site	Area of Archaeological Significance
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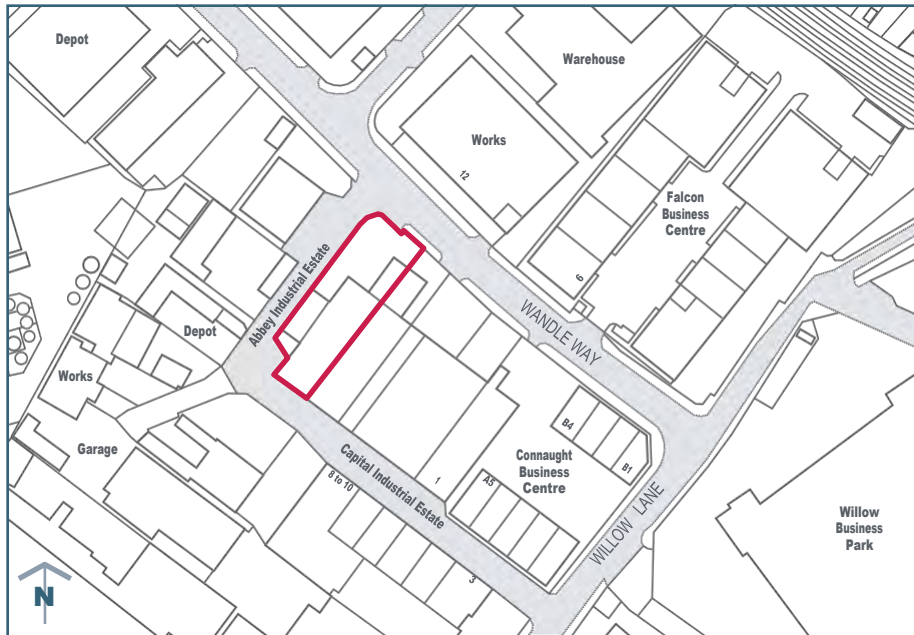
Currently Safeguarded	No
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Opportunity to increase waste managed	No. There are no plans by the South London Waste Partnership to intensify or upgrade operations at this site.
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Issues to consider if there is a further application	<p>Developers planning to intensify the safeguarded site should pay particular attention to:</p> <ul style="list-style-type: none"> ● Designing the site so that operations are carried out within a fully enclosed building ● Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site ● Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads ● Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts ● Protecting the amenity of those using the nearby Athelstan Recreation Ground, Kingsmeadow, Kingstonian Football Club Ground and Hogsmill Nature Reserve ● Minimising flood risk on- and off-site ● Evaluating and preserving any archaeological remains ● Not harming biodiversity in the vicinity ● Ensuring nearby watercourses are not harmed by the development and Environment Agency buffer zones are respected ● Designing a facility that does not impact on the openness of Metropolitan Open Land ● Providing appropriate soft landscaping
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M1 B&T@Work, Unit 5c, Wandle Way, Merton CR4 4NA



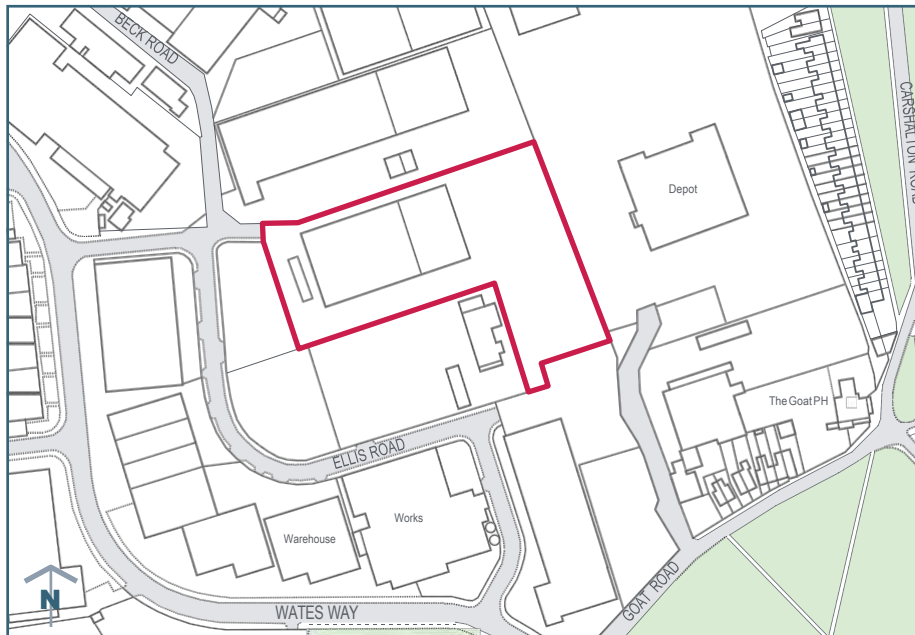
Site size (ha)	0.06
Type of waste	Transfer Station
Type of waste	Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	3,729
Licensed capacity (tpa)	5,000
Qualifying throughput (tpa)	0

Not to Scale

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Site Description	<p>Open area with skips</p> <p>Located within an industrial area and surrounded by similar two-storey sheds.</p> <p>Connect House, which was converted to residential use through permitted development, lies in the middle of the Willow Lane Strategic Industrial Location to the south of the site</p>
Planning Designations	<p>Strategic Industrial Location</p> <p>Archaeological Priority Zone</p>
Currently Safeguarded	No
Opportunity to increase waste managed	No. The throughput per hectare is average for this type of facility so it is unlikely that it will be able to substantially intensify operations in its current form
Issues to consider if there is a further application	<p>Developers planning to intensify the safeguarded site should pay particular attention to:</p> <ul style="list-style-type: none"> ● Designing the site so that operations are carried out within a fully enclosed building ● Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site ● Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads ● Evaluating and preserving any archaeological remains ● Providing appropriate soft landscaping ● Ensuring the safety clearances for the overhead power lines crossing the site are respected

M2 European Metal Recycling, 23 Ellis Road, Willow Lane Industrial Estate, Merton CR4 4HX



Site size (ha)	1.0
Type of facility	Metal recycling
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	70,100
Licensed capacity (tpa)	109,500
Qualifying throughput (tpa)	70,100 (HCI)

Not to Scale

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Site Description A collection of large double-height warehouses and office space with hardstanding for metal sorting, vehicles and skips
 Located within the Willow Lane industrial estate and surrounded by similar industrial properties.
 Connect House, which was converted to residential use through permitted development, lies in the middle of the Willow Lane Strategic Industrial Location to the north west of the site

Planning Designations Strategic Industrial Location
 Archaeological Priority Zone
 Flood Zone 2

Currently Safeguarded Yes. Site Reference in SLWP 2011: 22 (under name of B Nebbett & Son)

Opportunity to increase waste managed No. The throughput is good for this type of facility so it is unlikely that it will be able to intensify operations in its current form

- Issues to consider if there is a further application** Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
 - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
 - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
 - Minimising flood risk on- and off-site
 - Evaluating and preserving any archaeological remains
 - Providing appropriate soft landscaping
 - Ensuring the safety clearances for overhead power lines crossing the site are respected

M3 Deadman Confidential, 35 Willow Lane, Merton CR4 4NA



Not to Scale

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Site size (ha)	0.4
Type of facility	Paper sorting and baling
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	5,000
Licensed capacity (tpa)	N/A
Qualifying throughput (tpa)	5,000 (HCI)

Site Description Hardstanding for material sorting, vehicles and skips. Two-storey portakabin office Located within the Willow Lane industrial estate and surrounded by similar industrial properties. Connect House, which was converted to residential use through permitted development, lies in the middle of the Willow Lane Strategic Industrial Location to the north east of the site

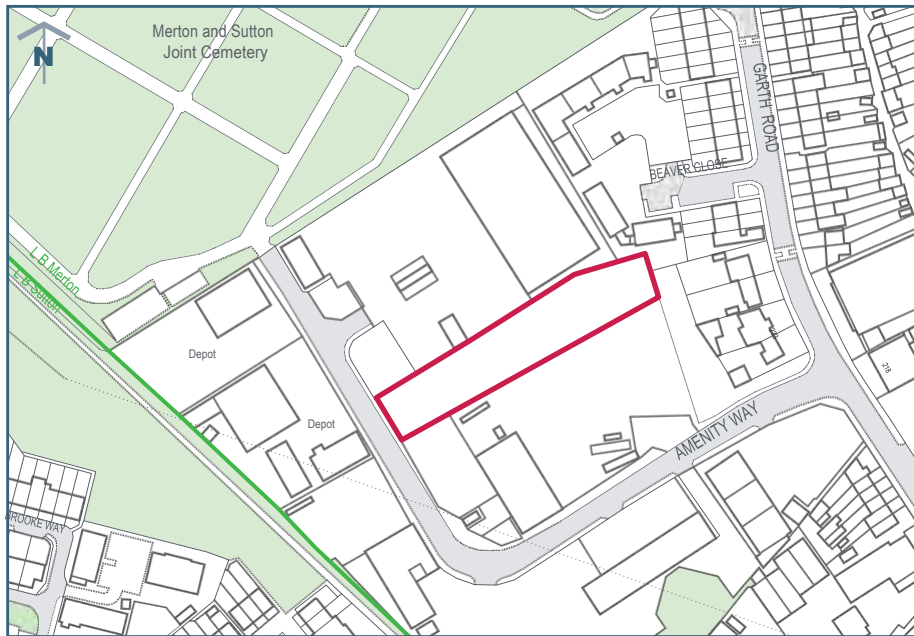
Planning Designations Strategic Industrial Location
Archaeological Priority Zone
Flood Zone 2

Currently Safeguarded No

Opportunity to increase waste managed Yes. There is a 2010 planning permission for metals recycling on this site with a throughput of 1,500 tonnes per week, which equates to 78,000 tonnes per annum. Therefore, there could be an opportunity to intensify throughput on the site with some intervention.

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
 - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
 - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
 - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
 - Minimising flood risk on- and off-site
 - Evaluating and preserving any archaeological remains
 - Providing appropriate soft landscaping

M4 Garth Road Reuse and Recycling Centre, 66-69 Amenity Way, Garth Road, Merton SM4 4AX



Not to Scale

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Site size (ha)	0.7 (including M5)
Type of facility	Household Waste Amenity Site
Type of waste	Local Authority Collected Waste
Maximum throughput tonnes per annum (tpa)	14,594
Licensed capacity (tpa)	25,000
Qualifying throughput (tpa)	9,866 (HCI)

Site Description Open local authority reuse and recycling centre
 The site is within the Garth Road Industrial Estate. At present, the site is shared between the household reuse and recycling centre and Merton council’s Local Authority Collected Waste transfer station. To the north of the site, there is a waste transfer station, to the east there are houses and to the south and west are Merton council’s highways depot and industrial units

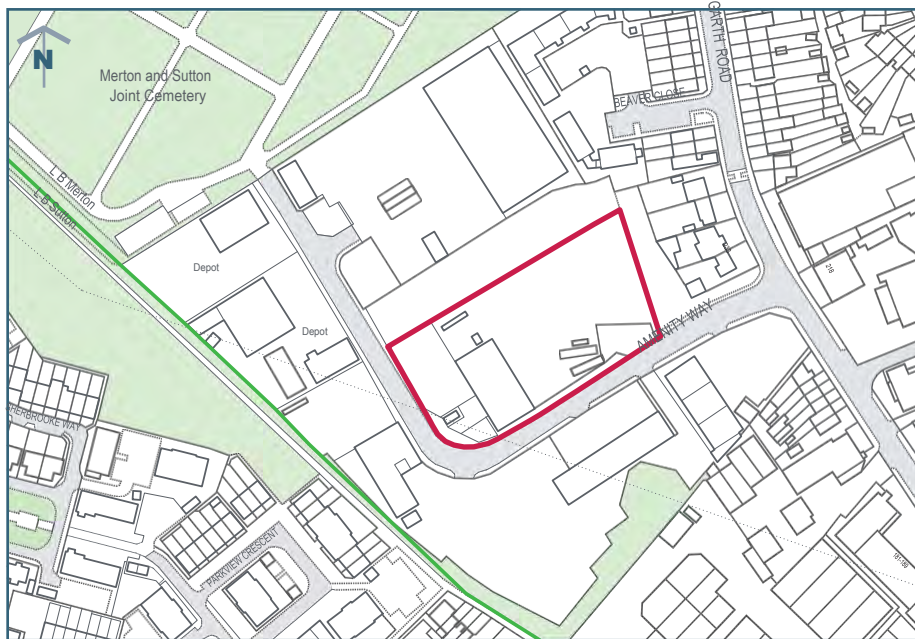
Planning Designations Locally Significant Industrial Location

Currently Safeguarded Yes. Site Reference in SLWP 2011: 9

Opportunity to increase waste managed No. There are no plans by the South London Waste Partnership to intensify or upgrade operations at this site

- Issues to consider if there is a further application** Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
 - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
 - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
 - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
 - Providing appropriate soft landscaping

M5 Garth Road Transfer Station, 66-69 Amenity Way, Garth Road, Merton SM4 4AX



Not to Scale

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Site size (ha)	0.45
Type of facility	Transfer Station
Type of waste	Local Authority, Collected Waste and Hazardous
Maximum throughput tonnes per annum (tpa)	18,839
Licensed capacity (tpa)	22,281
Qualifying throughput (tpa)	15,704 (HCl)

Site Description Transfer station
 The site is within the Garth Road Industrial Estate. At present, the site is shared between the household reuse and recycling centre and Merton council’s Local Authority Collected Waste transfer station. To the north of the site, there is a waste transfer station, to the east there are houses and to the south and west are Merton council’s highways depot and industrial units

Planning Designations Locally Significant Industrial Location

Currently Safeguarded Yes. Site Reference in SLWP 2011: 9

Opportunity to increase waste managed No. There are no plans by the South London Waste Partnership to intensify or upgrade operations at this site

- Issues to consider if there is a further application** Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
 - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
 - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
 - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
 - Providing appropriate soft landscaping
 - Ensuring the safety clearances for the overhead power lines crossing the site are respected

M6 George Killoughery, 41 Willow Lane, Merton CR4 4NA



Site size (ha)	0.8
Type of facility	Transfer Station
Type of waste accepted	Construction and Demolition
Maximum throughput tonnes per annum (tpa)	71,253
Licensed capacity (tpa)	74,999
Qualifying throughput (tpa)	0

Not to Scale

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Site Description A large site comprising a double-height industrial shed with hardstanding for vehicles, skips and waste. Located within the Willow Lane industrial estate and surrounded by similar industrial properties. Connect House, which was converted to residential use through permitted development, lies in the middle of the Willow Lane Strategic Industrial Location to the north east of the site

Planning Designations Strategic Industrial Location Archaeological Priority Zone Flood Zone 2

Currently Safeguarded No

Opportunity to increase waste managed No. The throughput per hectare is average for this type of facility so it is unlikely that it will be able to substantially intensify operations in its current form

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
 - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
 - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
 - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
 - Minimising flood risk on- and off-site
 - Evaluating and preserving any archaeological remains
 - Not harming biodiversity in the vicinity
 - Ensuring nearby watercourses are not harmed by the development and there is an 8-metre buffer zone between the top of the riverbank and the edge of the development
 - Designing a facility that does not impact on the openness of Metropolitan Open Land
 - Providing appropriate soft landscaping

M7 LMD Waste Management, Yard adjacent to Unit 7, Abbey Industrial Estate, Willow Lane, Merton CR4 4NA



Site size (ha)	0.06
Type of facility	Transfer Station with Treatment
Type of waste	Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	24,999
Licensed capacity (tpa)	74,999
Qualifying throughput (tpa)	20,774 (C&D)

Not to Scale

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Site Description Mainly open hardstanding for Construction and Demolition waste sorting. Located within the Willow Lane industrial estate and surrounded by similar industrial properties. Connect House, which was converted to residential use through permitted development, lies in the middle of the Willow Lane Strategic Industrial Location to the south of the site

Planning Designations Strategic Industrial Location
Archaeological Priority Zone

Currently Safeguarded No

Opportunity to increase waste managed No. It is unlikely that there is an opportunity to intensify operations

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
 - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
 - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
 - Evaluating and preserving any archaeological remains
 - Providing appropriate soft landscaping

M8 LMD Waste Management, 32 Willow Lane, Merton CR4 4NA



Site size (ha)	0.07
Type of facility	Transfer Station
Type of waste	Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	38,738
Licensed capacity (tpa)	50,000
Qualifying throughput (tpa)	33,845 (C&D)

Not to Scale

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Site Description Double-height shed with attached single-storey offices
 Located within the Willow Lane industrial estate and surrounded by similar industrial properties.
 Connect House, which was converted to residential use through permitted development, lies in the middle of the Willow Lane Strategic Industrial Location opposite the site

Planning Designations Strategic Industrial Location
 Archaeological Priority Zone
 Flood Zone 2

Currently Safeguarded No

Opportunity to increase waste managed No. The throughput ratio is above average for this type of facility

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
 - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
 - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
 - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
 - Minimising flood risk on- and off-site
 - Evaluating and preserving any archaeological remains
 - Providing appropriate soft landscaping

M9 Maguire Skips, Storage Yard, Wandle Way, Merton CR4 4NB



Site size (ha)	0.2
Type of facility	Transfer Station
Type of waste	Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	58,150
Licensed capacity (tpa)	74,999
Qualifying throughput (tpa)	0

Not to Scale

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Site Description Mainly open hardstanding for skips and sorting. Double-height covered area. Located within the Willow Lane industrial estate and surrounded by similar industrial properties, however, there are residential properties approximately 20 metres to the north of the site

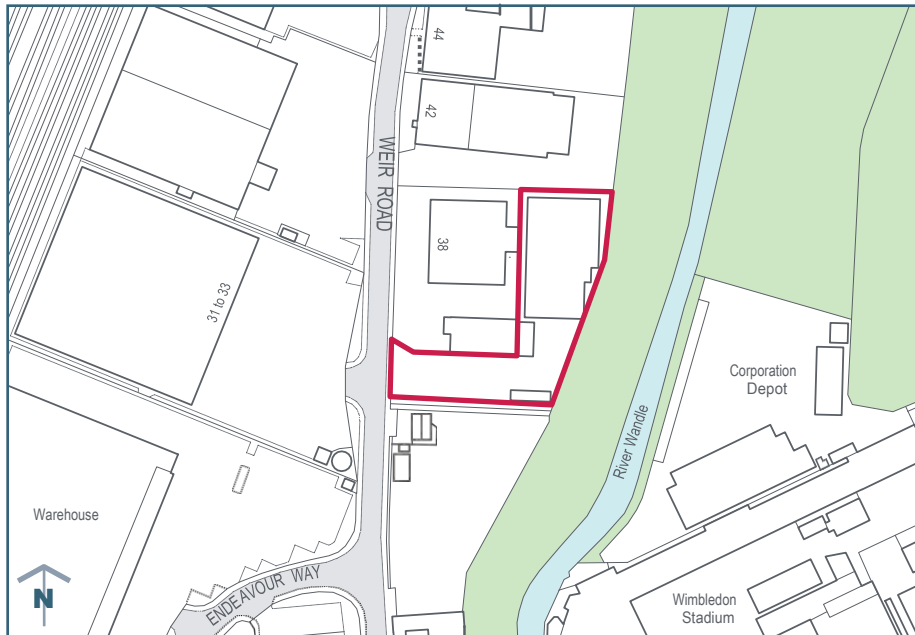
Planning Designations Strategic Industrial Location
Archaeological Priority Zone

Currently Safeguarded No

Opportunity to increase waste managed No. The plot throughput ratio is above average for this type of facility so there are unlikely to be opportunities to intensify the throughput.

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
 - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
 - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
 - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
 - Evaluating and preserving any archaeological remains
 - Providing appropriate soft landscaping
 - Consulting Transport for London for any impacts on the London Trams Network

M10 Powerday, Weir Court, 36 Weir Road, Merton SW19 8UG



Site size (ha)	0.3
Type of facility	Transfer Station and Treatment
Type of waste	Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	53,313
Licensed capacity (tpa)	74,999
Qualifying throughput (tpa)	42,856 (C&D)

Not to Scale

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Site Description

Enclosed double-height shed with outside hardstanding space
 Located within an industrial area comprising double- and triple-height industrial sheds and warehouses. Vantage House, which was converted to residential use through permitted development, lies at the southern edge of Durnsford Road Strategic Industrial Location

Planning Designations Strategic Industrial Location
 Archaeological Priority one

Currently Safeguarded No

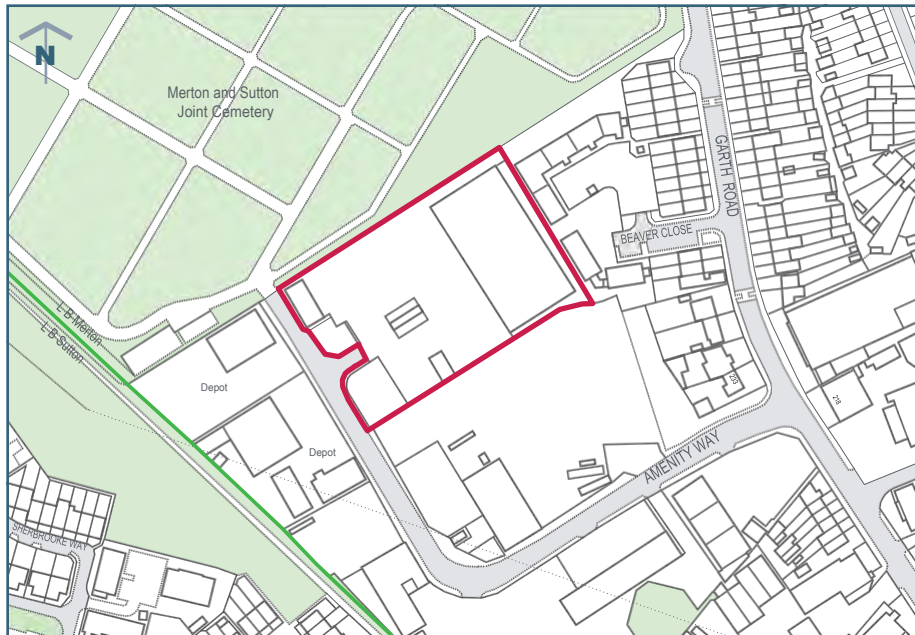
Opportunity to increase waste managed No. The throughput is good for this type of facility so it is unlikely that it will be able to intensify operations in its current form.

Issues to consider if there is a further application

Developers planning to intensify the safeguarded site should pay particular attention to:

- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Evaluating and preserving any archaeological remains
- Not harming biodiversity in the vicinity
- Ensuring nearby watercourses are not harmed by the development and there is an 8-metre buffer zone between the top of the riverbank and the edge of any development
- Designing a facility that does not impact on the openness of Metropolitan Open Land
- Providing appropriate soft landscaping

M11 Morden Transfer Station, Amenity Way, Merton SM4 4AX



Not to Scale

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Site size (ha)	0.8
Type of facility	Transfer Station
Type of waste	Household, Commercial and Industrial (HCI) Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	39,950
Licensed capacity (tpa)	74,999
Qualifying throughput (tpa)	0

Site Description

Double-height industrial shed with hardstanding
 The site lies within an industrial location surrounded by similar activities, and flats and a cemetery respectively along its north-eastern and north-western boundaries

Planning Designations Locally Significant Industrial Location

Currently Safeguarded Yes. Site Reference in 2011 SLWP: 25 (as Sloane Demolition)

Opportunity to increase waste managed No. There are no known plans to intensify operations at the facility

Issues to consider if there is a further application

- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
 - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
 - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
 - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
 - Protecting the amenity of those using the adjacent cemetery
 - Not harming biodiversity in the vicinity
 - Designing a facility that does not impact on the openness of Metropolitan Open Land
 - Providing appropriate soft landscaping

M12 NJB Recycling, 77 Weir Road, Merton SW19 8UG



Not to Scale

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Site size (ha)	0.4
Type of facility	Transfer Station with Treatment
Type of waste	Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	48,687
Licensed capacity (tpa)	75,000
Qualifying throughput (tpa)	18,030 (C&D)

Site Description Enclosed triple-height shed with outside hardstanding space for vehicles
 Located within an industrial area comprising double- and triple-height industrial sheds and warehouses. The site is adjacent to a Gypsy and Traveller site in Wandsworth

Planning Designations Strategic Industrial Location
 Archaeological Priority Zone

Currently Safeguarded No

Opportunity to increase waste managed No. The throughput per hectare is good for this type of facility so it is unlikely that it will be able to intensify operations in its current form

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
 - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
 - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
 - Minimising flood risk on- and off-site
 - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
 - Protecting the amenity of those using the future Wandle Valley Regional Park
 - Evaluating and preserving any archaeological remains
 - Not harming biodiversity in the vicinity
 - Ensuring nearby watercourses are not harmed by the development and there is an 8-metre buffer zone between the top of the riverbank and the edge of any development
 - Designing a facility that does not impact on the openness of Metropolitan Open Land
 - Providing appropriate soft landscaping

M13 One Waste Clearance, Unit 2 Abbey Industrial Estate, 24 Willow Lane, Merton CR4 4NA



Site size (ha)	0.1
Type of facility	Transfer Station
Type of waste	Household, Commercial and Industrial (HCI) Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	20,000
Licensed capacity (tpa)	75,000
Qualifying throughput (tpa)	13,453 (HCI) 4,547 (C&D)

Not to Scale

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Site Description The facility is a fully enclosed industrial unit Located within the Willow Lane industrial estate and surrounded by similar industrial properties. Connect House, which was converted to residential use through permitted development, lies in the middle of the Willow Lane Strategic Industrial Location to the south of the site

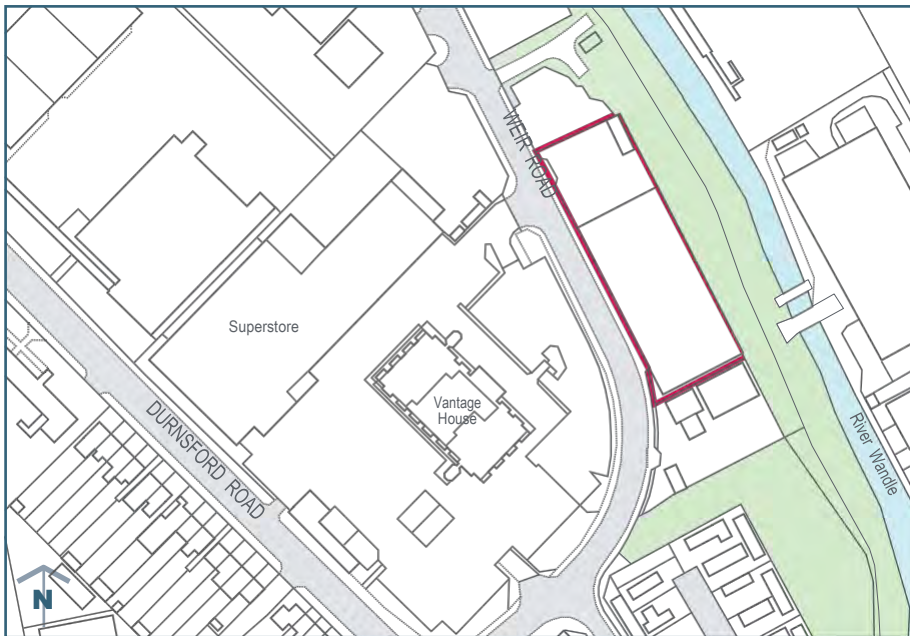
Planning Designations Strategic Industrial Location
Archaeological Priority Zone

Currently Safeguarded No

Opportunity to increase waste managed No. The throughput per hectare is based on the few weeks the facility has been operating, which is good for this type of facility so it is unlikely that it will be able to intensify operations in its current form

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
 - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
 - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
 - Evaluating and preserving any archaeological remains
 - Providing appropriate soft landscaping

M14 Reston Waste Transfer and Recovery, Unit 6, Weir Road, Merton SW19 8UG



Site size (ha)	0.43
Type of facility	Transfer Station with Treatment
Type of waste	Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	71,595
Licensed capacity (tpa)	74,999
Qualifying throughput (tpa)	30,131 (C&D)

Not to Scale

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Site Description Enclosed triple-height shed with outside hardstanding for vehicles. Located within an industrial area comprising double- and triple-height industrial sheds and warehouses. Vantage House, which was converted to residential use through permitted development, lies at the southern edge of Durnsford Road Strategic Industrial Location.

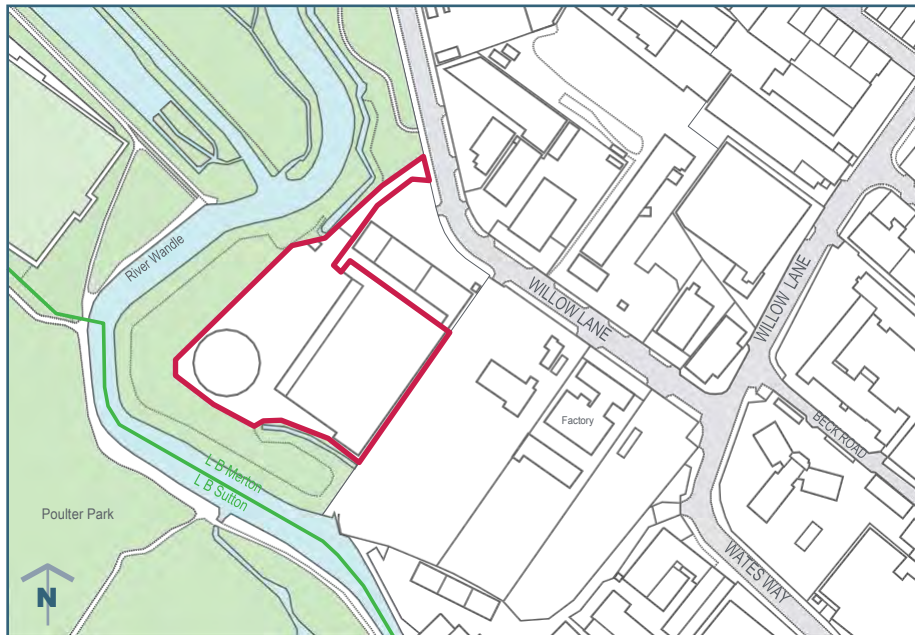
Planning Designations Strategic Industrial Location
Archaeological Priority Zone

Currently Safeguarded Yes. Site Reference in 2011 SLWP: 27 (known as the SITA Transfer Station)

Opportunity to increase waste managed No. The throughput per hectare is good for this type of facility so it is unlikely that it will be able to intensify operations in its current form.

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
 - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
 - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
 - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
 - Evaluating and preserving any archaeological remains
 - Not harming biodiversity in the vicinity
 - Ensuring nearby watercourses are not harmed by the development and there is an 8-metre buffer zone between the top of the riverbank and the edge of any development
 - Designing a facility that does not impact on the openness of Metropolitan Open Land
 - Providing appropriate soft landscaping

M15 Riverside AD Facility, 43 Willow Lane, Merton CR4 4NA



Site size (ha)	0.9 (includes M16)
Type of facility	Anaerobic Digestion
Type of waste	Household
Maximum throughput tonnes per annum (tpa)	36,341
Licensed capacity (tpa)	99,999
Qualifying throughput (tpa)	46,341 (HCI)

Not to Scale

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Site Description The facility uses in-vessel composting which takes mixed garden and kitchen waste, which are composted together in an enclosed vessel
 The site is located on the western edge of the Willow Lane Strategic Industrial Location. It is located off Willow Lane itself to the rear of building 41A and 43B.

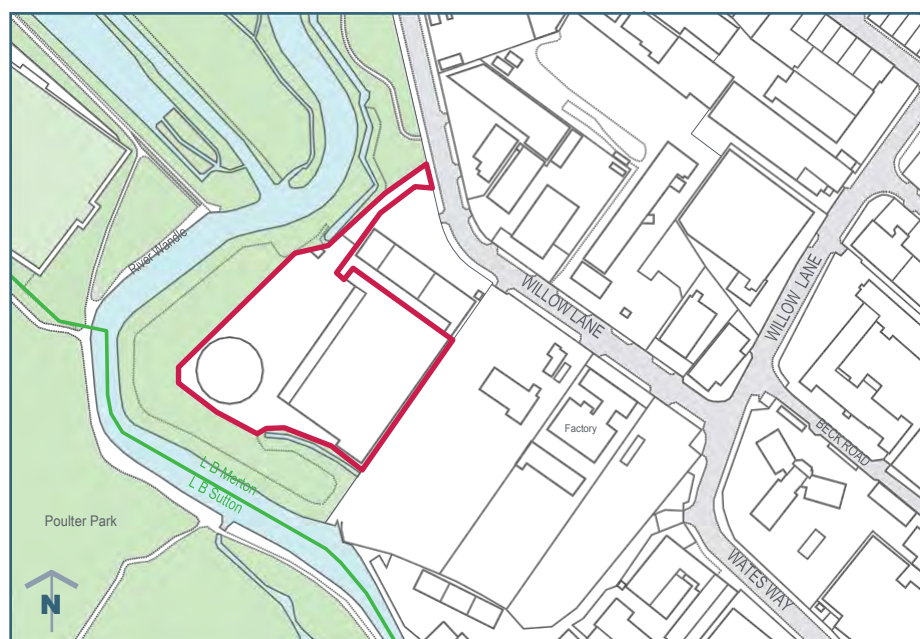
Planning Designations Strategic Industrial Location
 Archaeological Priority Zone
 Flood Zone 2

Currently Safeguarded Yes. Site Reference in 2011 SLWP: V (known as Vortal)

Opportunity to increase waste managed No. The throughput per hectare is good for this type of facility so it is unlikely that it will be able to intensify operations in its current form

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
 - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
 - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
 - Ensuring development does not affect adversely the adjacent Wandle Valley Conservation Area
 - Evaluating and preserving any archaeological remains
 - Not harming biodiversity in the vicinity
 - Ensuring nearby watercourses are not harmed by the development and there is an 8-metre buffer zone between the top of the riverbank and the edge of any development
 - Designing a facility that does not impact on the openness of Metropolitan Open Land
 - Providing appropriate soft landscaping

M16 Riverside Bio Waste Treatment Centre, 43 Willow Lane, Merton CR4 4NA



Not to Scale

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Site size (ha)	0.9 (includes M15)
Type of facility	Composting
Type of waste	Household
Maximum throughput tonnes per annum (tpa)	51,715
Licensed capacity (tpa)	100,000
Qualifying throughput (tpa)	51,715 (HCl)

Site Description The facility uses in-vessel composting which takes mixed garden and kitchen waste, which are composted together in an enclosed vessel. The site is located on the western edge of the Willow Lane Strategic Industrial Location. It is located off Willow Lane itself to the rear of building 41A and 43B.

Planning Designations Strategic Industrial Location
Archaeological Priority Zone
Flood Zone 2

Currently Safeguarded Yes. Site Reference in 2011 SLWP: V (known as Vortal)

Opportunity to increase waste managed No. The throughput per hectare is good for this type of facility so it is unlikely that it will be able to intensify operations in its current form

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
 - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
 - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
 - Minimising flood risk on- and off-site
 - Ensuring development does not adversely affect the adjacent Wandle Valley Conservation Area
 - Evaluating and preserving any archaeological remains
 - Not harming biodiversity in the vicinity
 - Ensuring nearby watercourses are not harmed by the development and there is an 8-metre buffer zone between the top of the riverbank and the edge of any development
 - Designing a facility that does not impact on the openness of Metropolitan Open Land
 - Providing appropriate soft landscaping

M17 UK and European (Ranns) Construction, Unit 3-5, 39 Willow Lane, Merton CR4 8NA



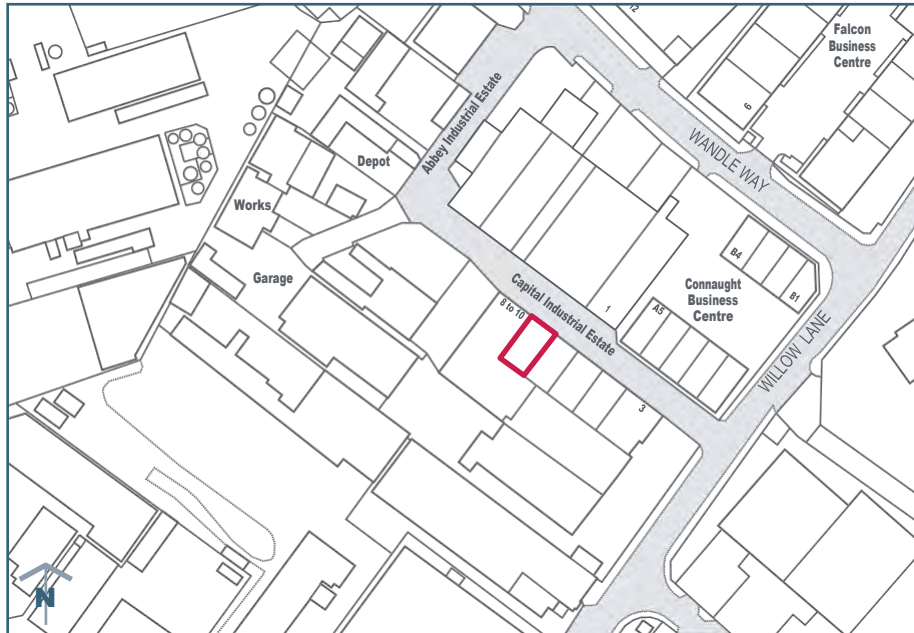
Site size (ha)	0.5
Type of facility	Treatment of waste to produce soil
Type of waste	Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	804
Licensed capacity (tpa)	75,000
Qualifying throughput (tpa)	0

Not to Scale

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Site Description	<p>A large site comprising a double-height industrial shed with hardstanding for vehicles, hardstanding for skips and construction, demolition and excavation waste</p> <p>The site is located within the Willow Lane industrial estate and surrounded by similar industrial properties. The River Wandle lies to the west of the site.</p> <p>Connect House, which was converted to residential use through permitted development lies to the north-east of the site</p>
Planning Designations	<p>Strategic Industrial Location</p> <p>Archaeological Priority Zone</p> <p>Flood Zone 2</p>
Currently Safeguarded	No
Opportunity to increase waste managed	Yes. The site appears to be operating well below its potential as a waste management site and there is the opportunity to intensify operations and increase throughput on the site
Issues to consider if there is a further application	<p>Developers planning to intensify the safeguarded site should pay particular attention to:</p> <ul style="list-style-type: none"> ● Designing the site so that operations are carried out within a fully enclosed building ● Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site ● Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads ● Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts ● Minimising flood risk on- and off-site ● Evaluating and preserving any archaeological remains ● Providing appropriate soft landscaping

M18 Wandle Waste Management, Unit 7, Abbey industrial Estate, Willow Lane, Merton CR4 4NA



Site size (ha)	0.07
Type of facility	Transfer Station
Type of waste	Hazardous
Maximum throughput tonnes per annum (tpa)	141
Licensed capacity (tpa)	24,999
Qualifying throughput (tpa)	0

Not to Scale

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Site Description A double-height industrial shed
 The site is located within the Willow Lane industrial estate and surrounded by similar industrial properties.
 Connect House, which was converted to residential use through permitted development lies to the south of the site

Planning Designations Strategic Industrial Location
 Archaeological Priority Zone

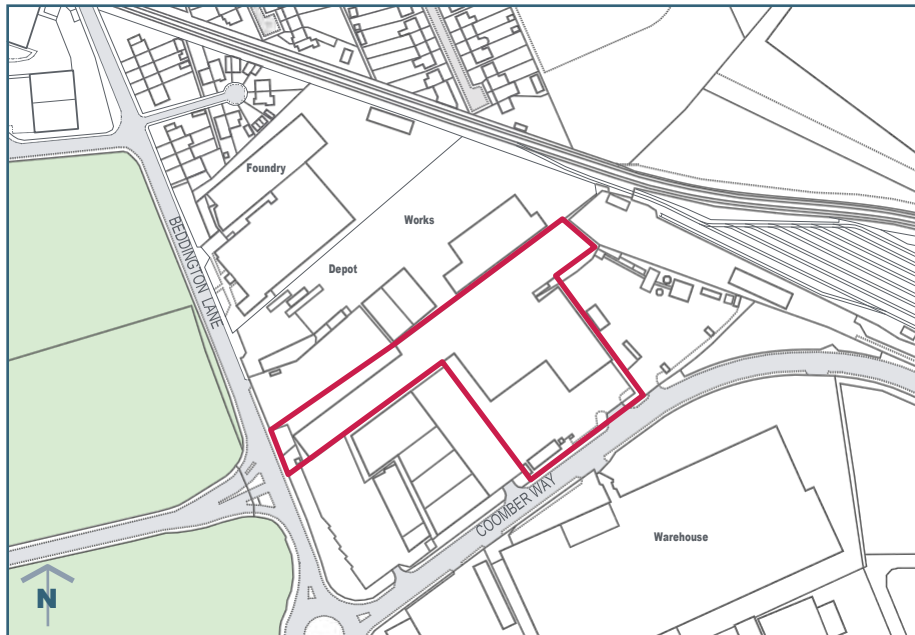
Currently Safeguarded No

Opportunity to increase waste managed No. The throughput on this site is very small and it is unlikely that there is an opportunity to intensify operations at the site

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
 - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
 - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
 - Evaluating and preserving any archaeological remains
 - Providing appropriate soft landscaping



S1 777 Recycling Centre, 154a Beddington Lane, Sutton CR0 4TE



Site size (ha)	1.0
Type of facility	Material Recycling and Treatment
Type of waste	Household, Commercial and Industrial (HCI) Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	56,912
Licensed capacity (tpa)	372,600
Qualifying throughput (tpa)	20,625 (HCI) 32,972 (C&D)

Not to Scale

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Site Description The site comprises large double-height and triple-height modern industrial sheds with hardstanding for skip storage and parking
The site is part of a large strategic industrial location, backing on to tram lines to the rear.

Planning Designations Strategic Industrial Location
Archaeological Priority Zone

Currently Safeguarded Yes. Site Reference in 2011 SLWP: 21

Opportunity to increase waste managed No. The site has a current maximum throughput of just under 57,000 tonnes

Issues to consider if there is a further application

Developers planning to intensify the safeguarded site should pay particular attention to:

- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Undertaking an assessment of the cumulative impacts on the highway network, which should be discussed with Transport for London, and limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Evaluating and preserving any archaeological remains
- Providing appropriate soft landscaping
- Ensuring the nearby underground electricity cable is neither damaged nor made inaccessible

S2 Beddington Farmlands Energy Recovery Facility, 105 Beddington Lane, Sutton CR0 4TD



Site size (ha)	5.4
Type of facility	Energy from waste
Type of waste accepted	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	275,000
Licensed capacity (tpa)	302,500
Qualifying throughput (tpa)	275,000 (HCI)

Not to Scale

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Site Description An energy recovery facility. The facility lies within the Wandle Valley Regional Park and Metropolitan Open Land and is adjacent to the Viridor Recycling Facility and the Beddington Farmlands Landfill site. The land immediately to the east has permission for an extension to the Beddington Strategic Industrial Location

Planning Designations Metropolitan Open Land Metropolitan Green Chain
 Site of Importance for Nature Conservation
 Land safeguarded for the Wandle Valley Regional Park Archaeological Priority Zone

Currently Safeguarded No

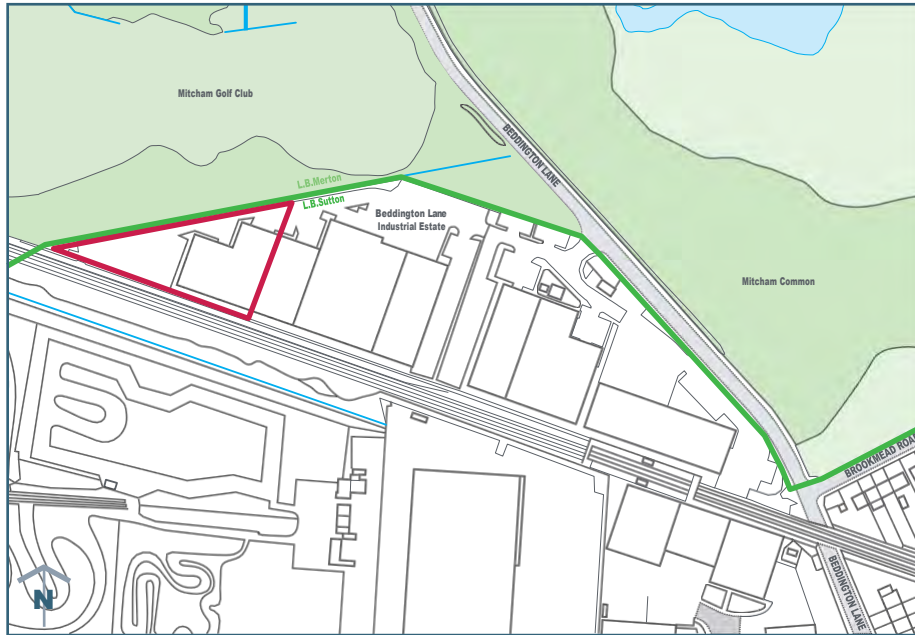
Opportunity to increase waste managed No. This is a new facility and therefore there are no opportunities to upgrade or intensify operations at the current time

Issues to consider if there is a further application

Developers planning to intensify the safeguarded site should pay particular attention to:

- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Undertaking an assessment of the cumulative impacts on the highway network, which should be discussed with Transport for London, and limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
- Protecting the amenity of those using the future Wandle Valley Regional Park
- Evaluating and preserving any archaeological remains
- Not harming biodiversity in the vicinity and providing appropriate soft landscaping
- Ensuring nearby watercourses are not harmed by the development
- Designing a facility that does not impact on the openness of Metropolitan Open Land
- Ensuring the safety clearances for the overhead power lines crossing the site are respected

S3 Cannon Hygiene, Unit 4, Beddington Lane Industrial Estate, 109-131 Beddington Lane, Sutton CR0 4TG



Site size (ha)	0.2
Type of facility	Transfer
Type of waste	Hazardous
Maximum throughput tonnes per annum (tpa)	9,601
Licensed capacity (tpa)	75,000
Qualifying throughput (tpa)	0

Not to Scale

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Site Description Modern, double-height industrial unit
 The Beddington Lane industrial estate lies at the northern end of the Purley Way and Beddington Strategic Industrial Location. It largely comprises large, double-height industrial sheds with some ancillary office space

Planning Designations Strategic Industrial Location
 Archaeological Priority Area

Currently Safeguarded No

Opportunity to increase waste managed Yes. The throughput per hectare is slightly lower than average for a transfer facility so there may be an opportunity to increase the throughput.

Issues to consider if there is a further application Developers planning to intensify the safeguarded site should pay particular attention to:

- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Undertaking an assessment of the cumulative impacts on the highway network, which should be discussed with Transport for London, and limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
- Protecting the amenity of those using the future Wandle Valley Regional Park
- Evaluating and preserving any archaeological remains
- Not harming biodiversity in the vicinity and providing appropriate soft landscaping
- Designing a facility that does not impact on the openness of Metropolitan Open Land
- Consulting Transport for London for any impacts on the London Trams Network

S4 Croydon Transfer Station, Endeavour Way, Beddington Farm Road, Sutton CR0 4TR



Not to Scale

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Site size (ha)	0.7
Type of facility	Transfer Station with Treatment
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	27,799
Licensed capacity (tpa)	75,000
Qualifying throughput (tpa)	21,113 (HCI)

Site Description A double- and triple-height enclosed sheds with hardstanding for vehicles
The site lies within a large industrial estate (Beddington Strategic Industrial Location) surrounded by similar industrial properties

Planning Designations Strategic Industrial Location
Archaeological Priority Area

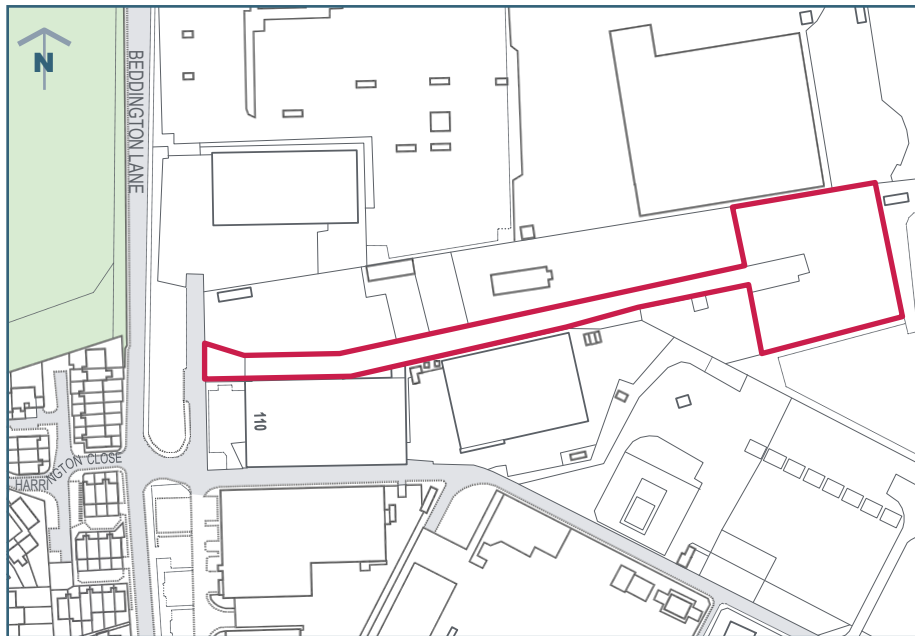
Currently Safeguarded Yes. Site Reference in 2011 SLWP: 98

Opportunity to increase waste managed Yes. The operator has stated it would be possible to intensify operations on site

Issues to consider if there is a further application Developers planning to intensify the safeguarded site should pay particular attention to:

- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Undertaking an assessment on the cumulative impacts on the highway network, which should be discussed with Transport for London, and limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Evaluating and preserving any archaeological remains
- Providing appropriate soft landscaping

S5 Hinton Skips, Land to the rear of 112 Beddington Lane, Sutton CR0 4TD



Not to Scale

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Site size (ha)	0.6
Type of facility	Transfer Station with Treatment
Type of waste	Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	8,000
Licensed capacity (tpa)	75,000
Qualifying throughput (tpa)	5,381 (HCI) 1,819 (C&D)

Site Description

An enclosed facility for segregation, recycling and recovery of skip waste materials with hardstanding for vehicles
The site lies within a large industrial estate (the Beddington Strategic Industrial Location) surrounded by similar industrial properties

Planning Designations

Strategic Industrial Location
Archaeological Priority Area
Flood Zone 2

Currently Safeguarded

No

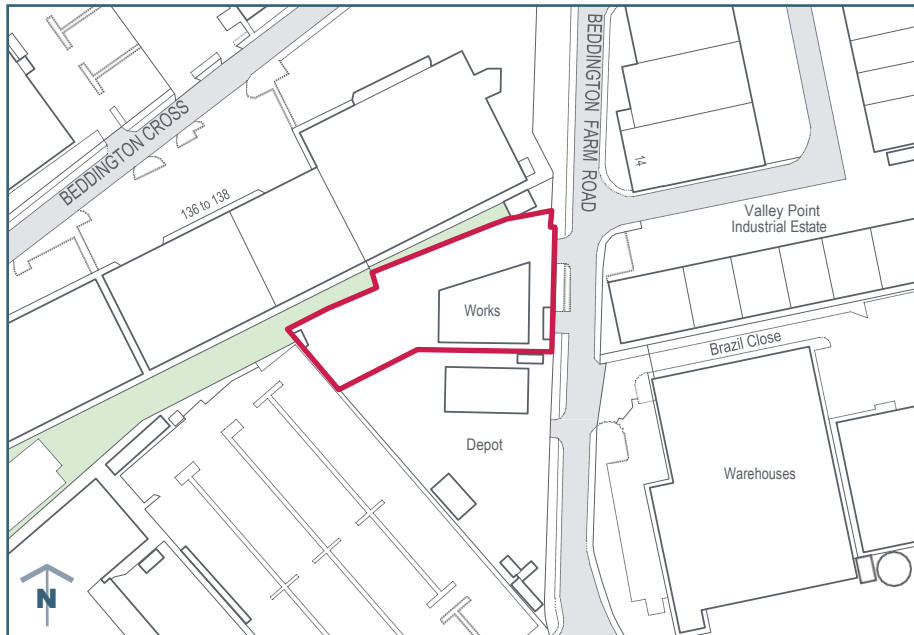
Opportunity to increase waste managed

Yes. This is a new facility which has only been operating for a short time. The operational throughput capacity of 8,000tpa has been estimated on the first quarterly return by the company. However, the planning application states that up to 50,000tpa could be managed on site. The estimated throughput is lower than average for this type of facility

Issues to consider if there is a further application

- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
 - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
 - Undertaking an assessment of the cumulative impacts on the highway network, which should be discussed with Transport for London, and limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
 - Minimising flood risk on- and off-site
 - Evaluating and preserving any archaeological remains
 - Providing appropriate soft landscaping
 - Ensuring the safety clearances for overhead power lines crossing the site are respected

S6 Hydro Cleansing, Hill House, Beddington Farm Road, Sutton CR0 4XB



Not to Scale

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Site size (ha)	0.2
Type of facility	Physical Treatment
Type of waste	Wastewater and Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	13,912
Licensed capacity (tpa)	100,000
Qualifying throughput (tpa)	0

Site Description

Fronted by two-storey, 1960s office block with facility to the rear
 The site is located on Beddington Farm Road in the Beddington Strategic Industrial Location. It is adjacent to the Surrey Jaguar Centre and the Royal Mail Centre

Planning Designations

Strategic Industrial Location
 Archaeological Priority Area

Currently Safeguarded

No

Opportunity to increase waste managed

No. The throughput per hectare is typical for this type of facility so it is unlikely that it will be able to intensify operations in its current form

Issues to consider if there is a further application

- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
 - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
 - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
 - Evaluating and preserving any archaeological remains
 - Providing appropriate soft landscaping

S7 Kimpton Park Way Household Reuse and Recycling Centre, Kimpton Park Way, Sutton SM3 9QH



Not to Scale

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Site size (ha)	0.4
Type of facility	Household Waste Amenity Site
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	14,799
Licensed capacity (tpa)	24,999
Qualifying throughput (tpa)	8,640 (HCI)

Site Description

Open local authority reuse and recycling centre
 The site is located in the north-west of the Kimpton Strategic Industrial Location.
 The site is opposite the Kimpton Linear Park, which is designated as a Metropolitan Green Chain, Metropolitan Open Land and Public Open Space

Planning Designations Strategic Industrial Location

Currently Safeguarded Yes. Site Reference in 2011 SLWP: 3

Opportunity to increase waste managed No. There are no plans by the South London Waste Partnership to intensify or upgrade operations at this site.

Issues to consider if there is a further application

- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
 - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
 - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
 - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
 - Protecting the amenity of those using the nearby Kimpton Linear Park
 - Designing a facility that does not impact on the openness of Metropolitan Open Land
 - Providing appropriate soft landscaping
 - Ensuring the safety clearance for the overhead power lines crossing the site are respected

S8 King Concrete, 124 Beddington Lane, Sutton CR0 4YZ



Site size (ha)	0.6
Type of facility	Transfer Station with Treatment
Type of waste	Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	1,060
Licensed capacity (tpa)	74,999
Qualifying throughput (tpa)	0

Not to Scale

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Site Description Open site for concrete production and aggregates recovery with a further open yard and warehouse building
 The site is part of the Beddington Strategic Industrial Location and is surrounded by similar uses

Planning Designations Strategic Industrial Location
 Archaeological Priority Area

Currently Safeguarded No

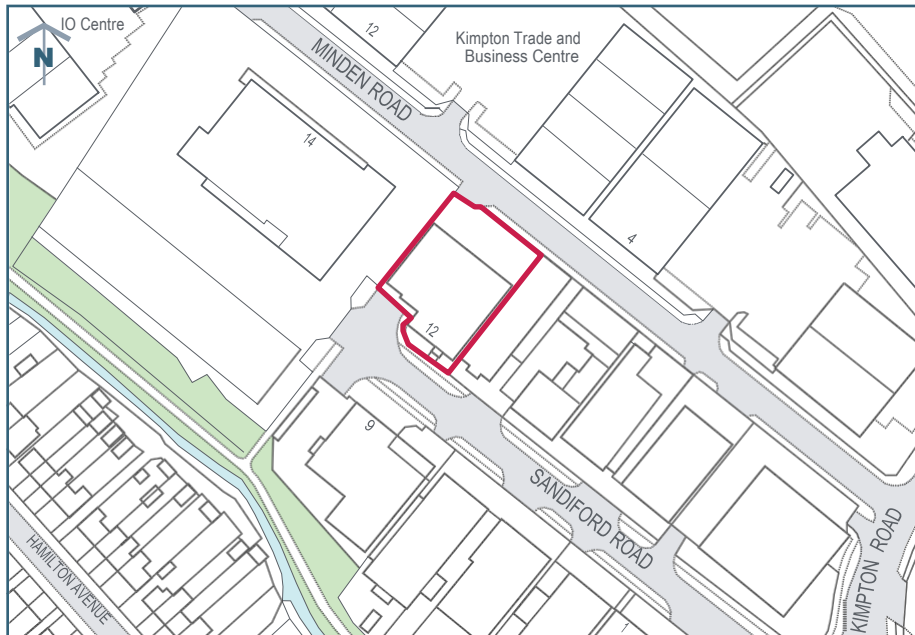
Opportunity to increase waste managed Yes. Although not all of the site is a waste recycling facility, it is managing well under the average throughput for this type of facility. The planning application states that the facility will recycle 20,000tpa of Construction, Demolition and Excavation waste on site

Issues to consider if there is a further application

Developers planning to intensify the safeguarded site should pay particular attention to:

- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Undertaking an assessment of the cumulative impacts on the highway network, which should be discussed with Transport for London, and limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Evaluating and preserving any archaeological remains
- Providing appropriate soft landscaping
- Ensuring the safety clearances for the overhead power lines crossing the sites are respected

S9 Premier Skip Hire, Unit 12, Sandiford Road, Sutton SM3 9RD



Not to Scale

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Site size (ha)	0.1
Type of facility	Transfer Station
Type of waste	Household, Commercial and Industrial (HCI) Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	12,000
Licensed capacity (tpa)	75,000
Qualifying throughput (tpa)	8,072

Site Description Two-storey office and warehouse building with hardstanding for skip storage
 The site is located within the Kimpton Strategic Industrial Location and the closest residential properties are 75-100m south and west of the site on Hamilton Avenue

Planning Designations Strategic Industrial Location

Currently Safeguarded No

Opportunity to increase waste managed No. The throughput per hectare is average for this type of facility so it is unlikely that it will be able to substantially intensify operations in its current form

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
 - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
 - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
 - Providing appropriate soft landscaping

S10 Raven Recycling, Unit 8-9, Endeavour Way, Beddington Farm Road, Sutton CR0 4TR



Site size (ha)	0.3
Type of facility	Transfer Station with Treatment
Type of waste	Household, Commercial and Industrial (HCI) Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	15,224
Licensed capacity (tpa)	74,999
Qualifying throughput (tpa)	5,310 (HCI) 5,506 (C&D)

Not to Scale

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Site Description

Double-height enclosed sheds with hardstanding for skips
 The site lies within a large industrial estate (the Beddington Strategic Industrial Location) surrounded by similar industrial properties

Planning Designations Strategic Industrial Location
 Archaeological Priority Area

Currently Safeguarded No

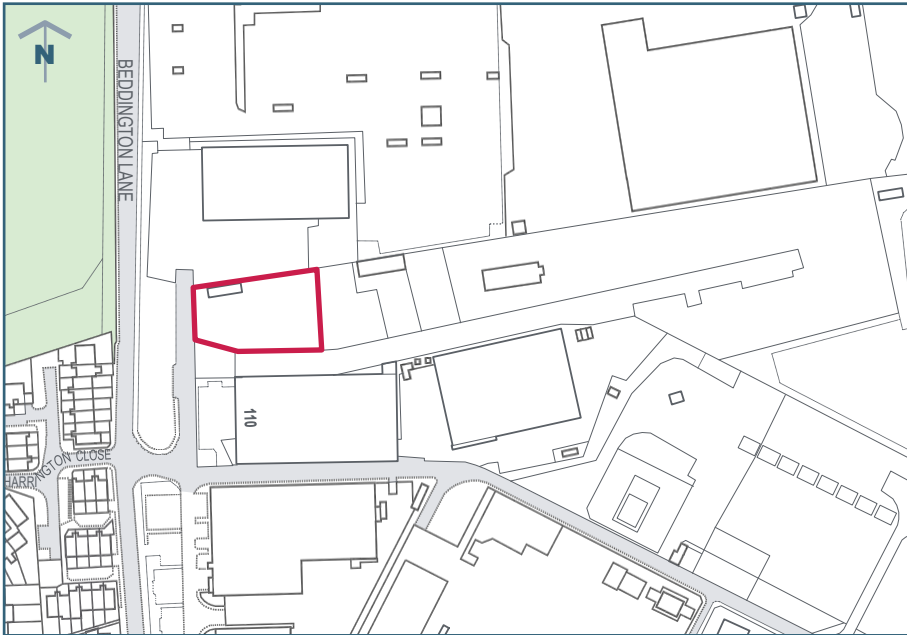
Opportunity to increase waste managed No. The throughput per hectare is average for this type of facility so it is unlikely that it will be able to substantially intensify operations in its current form

Issues to consider if there is a further application

Developers planning to intensify the safeguarded site should pay particular attention to:

- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Providing appropriate soft landscaping

S11 TGM Environmental, 112 Beddington Lane, Sutton CR0 4TD



Site size (ha)	0.2
Type of facility	Transfer Station
Type of waste	Household, Commercial and Industrial (HCI)
Maximum throughput tonnes per annum (tpa)	Not published yet
Licensed capacity (tpa)	15,000
Qualifying throughput (tpa)	15,000 (HCI)

Not to Scale

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Site Description The site is currently being used for skip and vehicle storage by Raven Recycling. However the site has planning permission for waste paper and cardboard recovery by TGM Environmental with a throughput of 15,000 tonnes per annum. The site occupies the land to the front of 112 Beddington Lane. The site lies within the Beddington Strategic Industrial Location and similar uses surround the site.

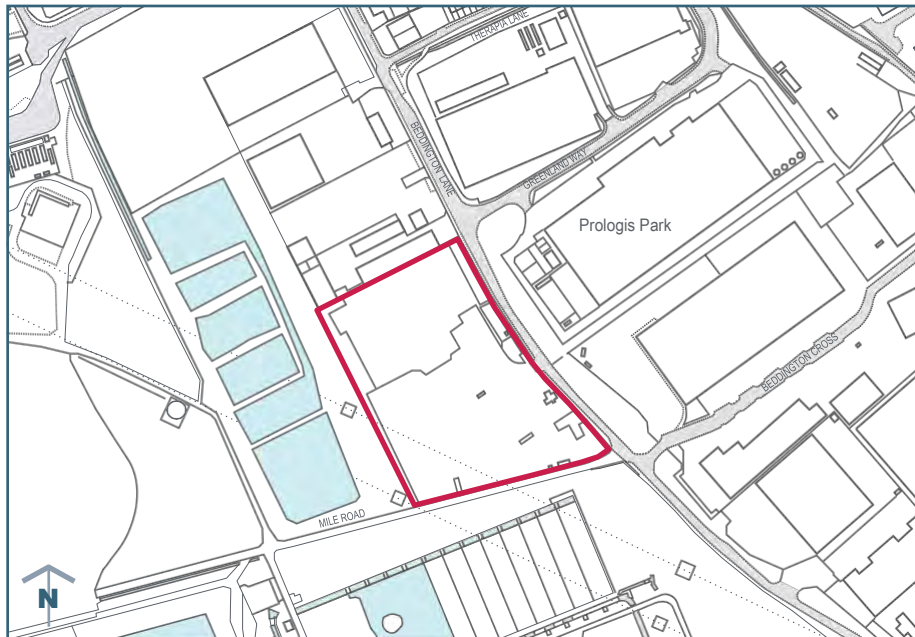
Planning Designations Strategic Industrial Location
Archaeological Priority Area
Flood Zone 2

Currently Safeguarded No

Opportunity to increase waste managed No. The operation has yet to relocate from 156 Beddington Lane. However this site offers additional space to enable the operator to undertake baling on site which did not take place on the previous site. The throughput is average for the size of the site and so it is unlikely that the facility can be intensified in its current form.

- Issues to consider if there is a further application**
- Developers planning to intensify the safeguarded site should pay particular attention to:
- Designing the site so that operations are carried out within a fully enclosed building
 - Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
 - Limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
 - Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
 - Minimising flood risk on- and off-site
 - Evaluating and preserving any archaeological remains
 - Providing appropriate soft landscaping

S12 Beddington Lane Resource Recovery Facility, 79-85 Beddington Lane, Sutton CR0 4TH



Site size (ha)	2.8
Type of facility	Treatment with Transfer Station
Type of waste accepted	Household, Commercial and Industrial (HCI), Construction and Demolition (C&D)
Maximum throughput tonnes per annum (tpa)	Not published yet
Licensed capacity (tpa)	350,000
Qualifying throughput (tpa)	305,000 (HCI and C&D)

Not to Scale

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Site Description The site is currently vacant but the new planning permission proposal is for a main building of 2-3 storeys, a standalone office, a covered parking area and hardstanding for manoeuvring. The site occupies the land to the west of Beddington Lane. It is surrounded by the proposed Wandle Valley Regional Park, Beddington Lane and industrial units to the north.

Planning Designations Strategic Industrial Location
Archaeological Priority Area

Currently Safeguarded Yes. Site Reference in 2011 SLWP: 17

Opportunity to increase waste managed No. The site has only recently been granted planning permission so no increase in the waste managed is likely to take place.

Issues to consider if there is a further application

Developers planning to intensify the safeguarded site should pay particular attention to:

- Designing the site so that operations are carried out within a fully enclosed building
- Ensuring there is no potential for fugitive waste as a result of good on-site storage and effective wheel-washing on site
- Undertaking an assessment of the cumulative impacts on the highway network, which should be discussed with Transport for London, and limiting or mitigating traffic movements so as not to hinder traffic flow on the surrounding roads
- Protecting the residential amenity of those properties in the vicinity of the site, especially with regard to air emissions and noise impacts
- Protecting the amenity of those using the future Wandle Valley Regional Park
- Evaluating and preserving any archaeological remains
- Not harming biodiversity in the vicinity
- Ensuring nearby watercourses are not harmed by the development
- Designing a facility that does not impact on the openness of Metropolitan Open Land
- Ensuring the safety clearances for the overhead power lines crossing the site are respected



Appendix 1 Monitoring and Contingencies Table

Indicator 1 (for Policy WP1)	Household and Commercial and Industrial Waste Managed
References	Plan Objective :1 SA Objective: 1
Target	By 2036, 929,750 tonnes per annum
Monitoring	Monitor annually against target. Assess target annually, act on rolling three-year phase considering unmet target and relevant waste management capacity in the planning pipeline
Delivery Partners	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry
Management Actions	<p>Sites closing – Contact landowners/developers to identify whether it is a systemic failure or isolated failures. If systemic, work with the GLA, LWRB, EA to act as facilitators for waste management output. If isolated, work with landowners/developers to facilitate waste management output</p> <p>Compensatory provision not delivered – Analyse the boroughs’ Development Management procedures to identify this failure. Possibly revise South London Waste Plan to provide more sites in light of evidence</p>

Indicator 2 (for Policy WP2)	Construction and Demolition Waste Managed
References	Plan Objective :2 SA Objective: 1
Target	By 2036, 414,380 tonnes per annum
Monitoring	Monitor annually against target. Assess target annually, act on rolling three-year phase considering unmet target and relevant waste management capacity in the planning pipeline
Delivery Partners	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry
Management Actions	Sites closing – Contact landowners/developers to identify whether it is a systemic failure or isolated failures. If systemic, work with the GLA, LWRB, EA to act as facilitators for waste management output. If isolated, work with landowners/developers to facilitate waste management output Compensatory provision not delivered – Analyse the boroughs’ Development Management procedures to identify this failure. Possibly revise South London Waste Plan to provide more sites in light of evidence

Indicator 3 (for Policy WP2)	Radioactive, Agricultural and Hazardous Waste Treated
References	Plan Objective :2 SA Objective: 1
Target	0 permissions
Monitoring	Monitor annually against target
Delivery Partners	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry
Management Actions	Sites permitted – Analyse the boroughs’ Development Management procedures to identify this failure. Examine whether there is any unidentified need for these streams of waste. Possibly revise South London Waste Plan in light of evidence.

Indicator 4 (for Policy WP3 & WP4)	Existing Waste Sites Safeguarded
References	Plan Objective :3 SA Objective: 1
Target	100% of safeguarded existing sites to be operational or to have compensatory provision provided
Monitoring	Monitor annually against target
Delivery Partners	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry
Management Actions	<p>Sites closing – Contact landowners/developers to identify whether it is a systemic failure or isolated failures. If systemic, work with the GLA, LWRB, EA to act as facilitators for waste management output. If isolated, work with landowners/developers to facilitate waste management output</p> <p>Compensatory provision not delivered – Analyse the boroughs’ Development Management procedures to identify whether this is a systematic or isolated failure. Possibly revise South London Waste Plan to provide more sites in light of evidence.</p>

Indicator 5 (for Policy WP5(b))	Compensatory or Intensified Sites with Fully Enclosed Covered Building
References	Plan Objective :6 SA Objective: 11
Target	100% of permissions
Monitoring	Monitor annually against target
Delivery Partners	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry
Management Actions	Analyse the boroughs’ Development Management procedures to identify any failure. Examine whether there are specific reasons why sites without a fully enclosed covered building have not been permitted. Possibly provide design guidance. Possibly revise South London Waste Plan in light of evidence

Indicator 6 (for Policy WP5(c))	Development on Green Belt, Metropolitan Open Land and Open Space
References	Plan Objective :6 SA Objective: 6
Target	0 ha of development on Green Belt, Metropolitan Open and Open Space
Monitoring	Monitor annually against target
Delivery Partners	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry
Management Actions	Analyse the boroughs' Development Management procedures to identify any failure. Examine whether there are specific reasons why sites on Green Belt, Metropolitan Open and Open Space have been permitted. Possibly revise South London Waste Plan in light of evidence

Indicator 7 (for Policy WP5(c))	Development on Nationally, Regionally or Locally Designated Nature Conservation Areas
References	Plan Objective :6 SA Objective: 12
Target	0 ha of development on Nationally, Regionally and Locally Designated Nature Conservation Areas
Monitoring	Monitor annually against target
Delivery Partners	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry
Management Actions	Analyse the boroughs' Development Management procedures to identify any failure. Examine whether there are specific reasons why sites with nationally, regionally or locally designated Nature Conservation Areas have been permitted. Possibly revise South London Waste Plan in light of evidence

Indicator 8 (for Policy WP5(c))	Development on Nationally, Regionally or Locally Designated Heritage Conservation Areas
References	Plan Objective :6 SA Objective: 14
Target	0 ha of development on Nationally, Regionally and Locally Designated Heritage Conservation Areas
Monitoring	Monitor annually against target
Delivery Partners	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry
Management Actions	Analyse the boroughs' Development Management procedures to identify any failure. Examine whether there are specific reasons why sites within Nationally, Regionally or Locally Designated Heritage Conservation Areas have been permitted. Possibly revise South London Waste Plan in light of evidence

Indicator 9 (for Policy WP5(c))	Development Permitted Against Environment Agency Advice (covers flood risk, groundwater risk, air emissions)
References	Plan Objective :6 SA Objective: 7
Target	0 ha of development permitted against Environment Agency advice
Monitoring	Monitor annually against target
Delivery Partners	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry
Management Actions	Analyse the boroughs' Development Management procedures to identify any failure. Examine whether there are specific reasons why sites have been permitted contrary to Environment Agency advice. Possibly revise South London Waste Plan in light of evidence

Indicator 10 (for Policy WP6)	Development Achieving BREEAM and/or CEEQUAL "Excellent" Rating
Refernces	Plan Objective 5
Target	100% of permissions
Monitoring	Monitor annually against target
Delivery Partners	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry
Management Actions	Analyse the boroughs' Development Management procedures to identify any failure. Examine whether there are specific reasons why sites have been permitted have not achieved BREEAM or CEEQUAL "Excellent" rating. Possibly provide design guidance. Possibly revise South London Waste Plan in light of evidence

Indicator 11 (for Policy WP7)	Development involving Energy from Waste
References	Plan Objective :6 SA Objective: 3
Target	0 permissions
Monitoring	Monitor annually against target
Delivery Partners	Greater London Authority (GLA), London Waste and Recycling Board (LWARB), South London Waste Plan (SLWP) boroughs, Environment Agency (EA), waste management industry
Management Actions	None. There should be no permissions.

Appendix 2 Sites Counting Towards the Apportionment and C&D Target

Ref	Name	HC&I	C&D	Potential for Intensification
Croydon Capacity				
C1	Able Waste Services	0	43,268	
C4	Days Aggregates Purley Depot	0	178,593	
C5A	Factory Lane Waste Transfer Station	0	0	Yes
C5B	Factory Lane Reuse and Recycling Centre Site	9,623	5,206	
C6	Fishers Farm Reuse and Recycling Centre	4,542	0	
C7	Henry Woods Waste Management	0	0	
C8	New Era Metals	4,213	0	
C9	Peartree Farm	0	0	
C10	Purley Oaks Reuse and Recycling Centre	6,684	0	
C11	SafetyKleen	0	0	
C12	Stubbs Mead Depot	0	0	
C13	Solo Wood Recycling	5,000	0	Yes
CEX	Exempt Sites	2,580	0	
	Croydon Total	32,883	227,067	
Kingston Capacity				
K2	Genuine Solutions Group	1,630	0	
K3	Kingston Reuse and Recycling Centre	9,392	0	
K4	Kingston Waste Transfer Station	19,620	0	
KEX	Exempt Sites	5,000	0	
	Kingston Total	35,642	0	
Merton Capacity				
M1	B&T@Work	0	0	
M2	European Metal Recycling	70,100	0	
M3	Deadman Confidential	9,866	0	
M4	Garth Road Reuse and Recycling Centre	15,704	0	
M5	Garth Road Transfer Station	0	0	
M6	George Killoughery	0	0	
M7	LMD Waste Management (Abbey Industrial Estate)	0	20,774	
M8	LMD Waste Management (Wandle Way)	0	33,845	
M9	Maguire Skips	0	0	
M10	Powerday	0	42,856	
M11	Morden Transfer Station	0	0	

M12	NJB Recycling	0	18,030	
M13	One Waste Clearance	13,453	4,547	
M14	Reston Waste Transfer and Recovery	0	30,131	
M15	Riverside AD Facility	46,341	0	
M16	Riverside Bio Waste Treatment Centre	51,715	0	
M17	UK and European (Ranns) Construction	0	0	
M18	Wandle Waste Management	0	0	
MEX	Exempt Sites	1,000	0	
	Merton Total	213,179	150,183	

Sutton Capacity

S1	777 Recycling	20,625	32,972	
S2	Beddington Farmlands Energy Recovery Facility	275,000	0	
S3	Cannon Hygiene	0	0	
S4	Croydon Transfer Station	21,113	0	Yes
S5	Hinton Skips	5,381	1,819	Yes
S6	Hydro Cleansing	0	0	
S7	Kimpton Reuse and Recycling Centre	8,640	0	
S8	King Concrete	0	0	Yes
S9	Premier Skip Hire	8,072	2,728	
S10	Raven Recycling	5,310	5,506	
S11	TGM Environmental	15,000	0	
S12	Beddington Resource Recovery Facility	305,000	0	
S13	Exempt Sites	500	0	
	Sutton Total	664,641	43,025	

South London Capacity

Croydon	32,883	227,067	
Kingston	35,642	0	
Merton	213,179	150,183	
Sutton	664,641	43,025	
South London Total	946,345	420,275	

South London Capacity against Target

South London Capacity	946,345	420,275	
South London Target	929,750	414,380	
South London Capacity against Target	+16,565	+5,895	

Appendix 3 Sites and Areas from the 2011 South London Waste Plan

Ref	Name	Borough	New Status
Safeguarded Sites			
1	Factory Lane Transfer Station	Croydon	Safeguarding carried forward as Site C5
2	Fisher's Farm Civic Amenity Site	Croydon	Safeguarding carried forward as Site C6
3	Kimpton Civic Amenity Site	Sutton	Safeguarding carried forward as Site S7
4	Purley Oaks Civic Amenity Site	Croydon	Safeguarding carried forward as Site C10
5	Pear Tree Farm Transfer Station	Croydon	Safeguarding carried forward as Site C9
6	Kingston Civic Amenity Site	Kingston	Safeguarding carried forward as Site K3
9	Garth Road Civic Amenity Site	Merton	Safeguarding carried forward as Site M4
17	Country Waste Recycling Ltd	Sutton	Safeguarding carried forward as SiteS12
18	Viridor Recycling and Composting Centre	Sutton	Due to close 2023. Land to become the Wandle Valley Regional Park
19	SE Skips/Waste World Ltd	Merton	Company replaced on Site M8 by LMD Waste Management
21	777 Recycling	Sutton	Safeguarding carried forward as Site S1
22	B Nebbett and Son	Merton	Company relocated and capacity transferred to Site M12
23	Five Star Japanese Autos	Merton	No longer managing waste in the area according to Environment Agency
25	Sloane Demolition	Merton	Safeguarding carried forward as Site M11 (now known as Morden Transfer Station)
26	Weir Road Civic Amenity Site	Merton	Closed and capacity transferred to Site M4: Garth Road Civic Amenity Site
27	SITA Transfer Station	Merton	Company replaced on Site M14 by Reston Waste Management
97	Sevenside Waste Paper	Sutton	Closed and capacity transferred to Site S11: TGM Environmental
98	Croydon Transfer Station	Sutton	Safeguarded carried forward as Site S4
100	European Metal Recycling (Therapia Lane)	Sutton	Closed and long-term vacant. Company relocated and capacity transferred to Site M2
101	Rentokil Initial Services Ltd	Merton	No longer managing waste in the area according to the Environment Agency
126	Benedict's Wharf Transfer Station	Merton	Closing and capacity transferred to Site S12: Country Waste Skip Hire
A	SafetyKleen	Croydon	Safeguarding carried forward as Site C11
B	Stubbs Mead Depot	Croydon	A feasibility study is being undertaken to understand the Local Plan housing allocation. It is due to be reported on in late October 2019. Safeguarding carried forward as Site C12.
V	Vertal	Merton	Safeguarding carried forward as Site M16 (now known as Riverside Bio)
BF	Beddington Farmlands Landfill	Sutton	Due to close 2023. Land to become the Wandle Valley Regional Park

Ref	Name	Borough	New Status
Areas With Sites Which May Be Suitable For Waste Facilities			
169	Willow Lane Industrial Estate	Merton	No longer needed
99	Purley Oaks Highways Depot	Croydon	No longer needed
102	Purley Way, Lysander Way, Imperial Way Industrial Estate	Croydon	No longer needed
105	Factory Lane Industrial Estate	Croydon	Safeguarding on part of area carried forward as Site C5
125	Factory Lane Industrial Estate (South Side)	Croydon	No longer needed
351	Chessington Industrial Estate	Kingston	No longer needed
252	Chessington Industrial Estate	Kingston	No longer needed
253	Chessington Industrial Estate	Kingston	No longer needed
491	Kimpton Industrial Estate	Sutton	No longer needed
532	Beddington Lane Industrial Estate	Sutton	No longer needed
533	Beddington Lane Industrial Estate	Sutton	No longer needed
534	Beddington Lane Industrial Estate	Sutton	No longer needed
535	Beddington Lane Industrial Estate	Sutton	No longer needed
539	Beddington Lane Industrial Estate	Sutton	No longer needed
5312	Beddington Lane Industrial Estate	Sutton	No longer needed
641	Durnsford Road Industrial Estate	Merton	No longer needed
642	Durnsford Road Industrial Estate	Merton	No longer needed
702	Garth Road Industrial Estate	Merton	No longer needed
1006	Wandle Valley Industrial Estate	Sutton	No longer needed



Appendix 4 Glossary

Anaerobic Digestion

Organic matter broken down by bacteria in the absence of air, producing a gas (methane) and liquid (digestate). The by-products can be biogas can be used in a furnace, gas engine, turbine or gas-powered vehicles, and digestates can be re-used as fertiliser

Beneficial Use

The placement of excavation waste in a way that:

- (1) provides environmental benefits, particularly in the restoration of priority habitats, flood alleviation or climate change adaptation/mitigation; or
- (2) contributes towards the restoration of landfill sites or mineral workings

Circular Economy

A circular economy is an alternative to a traditional linear economy (make-use-dispose). In the circular economy, resources are kept in use for as long as possible, the maximum value is extracted from them while in use, and products and materials are recovered and regenerated at the end of each service life.

Commercial Waste

Waste arising from trade premises

Construction and Demolition Waste

Controlled waste arising from the construction, repair, maintenance and demolition of buildings and structures

DEFRA - Department for Environment, Food and Rural Affairs

Defra is a UK Government department. Its mission is to enable everyone to live within our environmental means. This is most clearly exemplified by the need to tackle climate change internationally, through domestic action to reduce greenhouse gas emissions, and to secure a healthy and diverse natural environment

Environment Agency

A government body that aims to prevent or minimise the effects of pollution on the environment and issues permits to monitor and control activities that handle or produce waste. It also provides up-to-date information on waste management matters

Excavation Waste

Soil, stone, rock and similar materials arising from site preparation activities

Exemption

A waste exemption is a waste operation that is exempt from needing an environmental permit. Each exemption has specific limits and conditions operators need to work within

Hazardous Landfill

Sites where hazardous waste is landfilled. This can be a dedicated site or a single cell within a non-hazardous landfill, which has been designed and designated for depositing hazardous waste

Hazardous Treatment

Sites where hazardous waste is treated so that it can be landfilled

Hazardous Waste

Waste that poses substantial or potential threats to public health or the environment (when improperly treated, stored, transported or disposed). This can be due to the characteristics, quantity or concentration of the waste

HCI

Household, Commercial and Industrial waste. This term is used in waste data sources. These waste streams are also known as Local Authority Collected Waste (LACW) and Commercial and Industrial (C&I) waste. The term HCI is used to describe the throughput where a facility manages both waste streams

Household Waste

Refuse from household collection rounds, waste from street sweepings, public litter bins, bulky items collected from households and wastes which householders take to household waste reuse and recycling centres

Industrial Waste

Waste from a factory or industrial process

Inert Waste

Waste not undergoing significant physical, chemical or biological changes following disposal, as it does not adversely affect other matter that it may come into contact with, and does not endanger surface or groundwater

Inert Landfill

A landfill site that is licensed to accept inert waste for disposal

In-Vessel Composting

A system that ensures composting takes place in an enclosed but aerobic (in the presence of oxygen) environment, with accurate temperature control and monitoring. There are principal six types: containers, silos, agitated bays, tunnels, rotating drums and enclosed halls

ILW - Intermediate level radioactive waste

Radioactive wastes exceeding the upper activity boundaries for LLW but which do not need heat to be taken into account in the design of storage or disposal facilities

Local Authority Collected Waste (LACW)

Household waste and any other waste collected by a waste collection authority such as municipal parks and gardens waste and waste resulting from the clearance of fly-tipped materials

Landfill

The permanent disposal of waste into the ground, by the filling of man-made voids or similar features

Landfill Directive

European Union requirements on landfill to ensure high standards for disposal and to stimulate waste minimisation

LLW – low level radioactive waste

Lightly contaminated miscellaneous scrap, including metals, soil, building rubble, paper towels, clothing and laboratory equipment

Materials Recycling Facility (MRF)

A facility for sorting and packing recyclable waste

Mechanical Biological Treatment (MBT)

The treatment of residual waste using a combination of mechanical separation and biological treatment

Non-Hazardous Landfill

A landfill licensed to accept non-inert (biodegradable) wastes e.g. household and commercial and industrial waste and other non-hazardous wastes (including inert) that meet relevant criteria

Non-Inert

Waste that is biodegradable or may undergo significant physical, chemical or biological change once landfilled

Organic Waste

Biodegradable waste from gardening and landscaping activities, as well as food preparation and catering activities. This can be composed of garden or park waste, such as grass or flower cuttings and hedge trimmings, as well as domestic and commercial food waste

Open Windrow Composting

A managed biological process in which biodegradable waste (such as green waste and kitchen waste) is broken down in an open-air environment (aerobic conditions) by naturally occurring micro-organisms to produce a stabilised residue

Proximity Principle

Requires waste should be managed as near as possible to its place of production, reducing travel impacts

Recovery

Reuse, recycling, composting or recovery of energy

Recycled Aggregates

Aggregates produced from recycled construction waste such as crushed concrete and planings from tarmac roads

Recyclate

Raw material sent to, and processed in, a waste recycling plant or materials recovery facility

Recycling

The reprocessing of waste either into the same product or a different one

Residual Waste

Waste remaining after materials for re-use, recycling and composting have been removed

Reuse

The cleaning or repairing of waste for use in its original form

Waste Electrical and Electronic Equipment (WEEE)

End of life electrical or electronic equipment and covers virtually everything with a plug or battery. There are specific sites for the depollution, disassembly, shredding, recovery or preparation for disposal. The sites must meet the EU's WEEE Directive.

Waste Hierarchy

A framework for securing a sustainable approach to waste management. Waste should be minimised wherever possible. If waste cannot be avoided, then it should be re-used; after this it should be

prepared for recycling, value recovered by recycling or composting or waste to energy; and finally, disposal of this waste.

Waste Local Plan

A statutory development plan prepared by waste planning authorities, setting out policies in relation to waste management and related developments

Waste Management

Processes by which waste is reused, recycled or recovered. It does not include waste transfer (where waste is sorted and baled) or landfill

Waste Minimisation / Reduction

The most desirable way of managing waste, by avoiding the production of waste in the first place

Waste Planning Authority (WPA)

The local authority responsible for waste development planning and management. They are unitary authorities, including London Boroughs, and the City of London, National Park Authorities, and county councils in two-tier areas.

The WPAs for the South London Waste Plan are

- London Borough of Croydon,
- Royal Borough of Kingston,
- London Borough of Merton, and
- London Borough of Sutton

Waste Regulation Authority

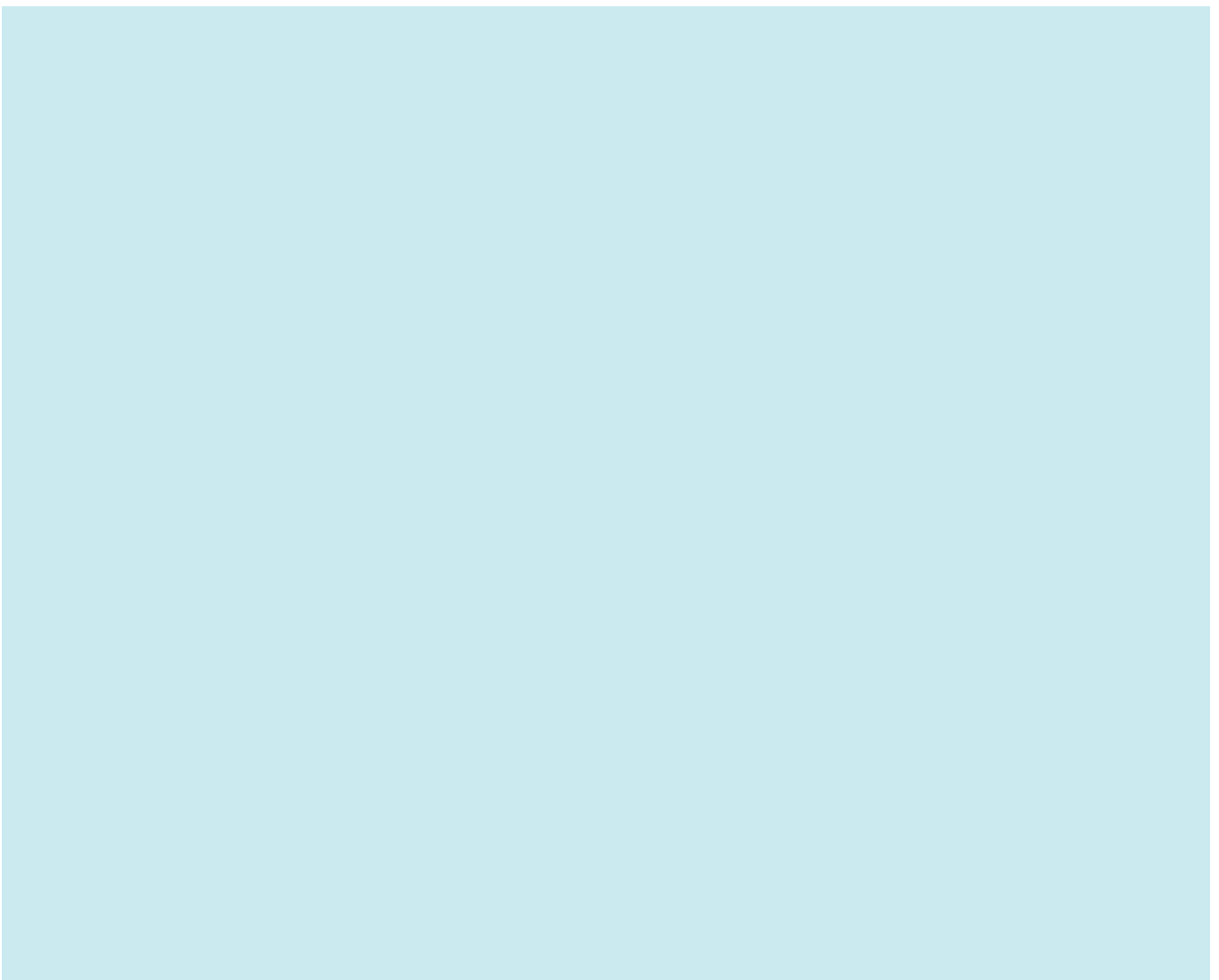
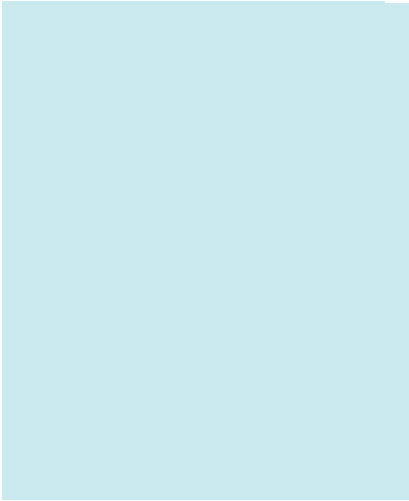
The Environment Agency has responsibility for authorising waste management licenses for disposal facilities and for monitoring sites

Waste Transfer

Processes by which waste is sorted or baled prior to transfer to another place for reuse, recycling, recovery or disposal. Although in practice, usually some reuse, recycling and recovery occurs in the sorting and baling.

Waste Treatment

All processes for waste management (see above) and waste transfer (see



REPORT TO:	CABINET November 16th 2022
SUBJECT:	Improving Procurement Decision Making and Governance
LEAD OFFICER:	SCOTT FUNNELL HEAD OF STRATEGIC PROCUREMENT AND GOVERNANCE
CABINET MEMBER:	COUNCILLOR CUMMINGS CABINET MEMBER FOR FINANCE
WARDS:	ALL

SUMMARY OF REPORT:

To set out the recommendations and actions to be taken to simplify, accelerate and improve procurement decision making for contract spend. An Annual Procurement Plan (APP) will enable earlier engagement with the Executive Mayor and Cabinet Members, improving the influence for the strategic approach to commissioning and procurement and streamlining the decision-making process.

The aim of the APP is to provide a forward-looking view of the Council's planned procurement activity to support better financial planning and uphold compliance in the most efficient way which will make the Council easier to do business with and be more attractive to suppliers and SME's.

FINANCIAL IMPACT:

There is no direct financial impact. However, good governance and advanced planning of a procurement pipeline of expiring contracts mitigates the risks associated with being out of contract and supports better resource allocation.

KEY DECISION REFERENCE NO.: Not a key decision

Approval of these recommendations would not constitute a key decision.

The Executive Mayor in Cabinet is recommended to make the decisions set out below:

RECOMMENDATIONS:

1. To approve the introduction of an Annual Procurement Plan (APP) to the Executive Mayor in Cabinet that includes proposed procurement and contract extension and the delegated decision makers for the forthcoming year. The updates and progress on the APP to be reported to the Mayor in Cabinet on a quarterly basis.

2. To approve the first Annual Procurement Plan for the remainder of the financial year and for the period November 2022 to March 2023 as set out in Appendix 1.
3. To approve the delegated decisions in the APP to those Lead Members or Officers as stated in Appendix 1 that includes the contract/procurement strategy and award decisions, the duration of the contract and contract value.
4. The delegated decisions shall only be exercised following recommendations from the Contracts & Commissioning Board, which require approval from both the Lead Cabinet Member and the Cabinet Member for Finance.
5. To allow for minor changes to proceed whilst retaining the agreed delegated so long as none of the following thresholds for changes are exceeded:
 - i. Contract value exceeds that proposed in the APP/Quarterly Update Report, by the lesser of £500K or 25%, or the new aggregate value exceeds £1m and it becomes a key decision
 - ii. Substantial / material changes to procurement from that defined in the APP/Quarterly Update Report e.g. material risks are identified

(Should either of those thresholds be exceeded, the delegation cannot be exercised, and the decision shall be recommended to the Executive Mayor, unless a further delegation is approved. Where a delegated decision is a Key Decision to Officers, it must be made in consultation with the Lead Cabinet Member.)
6. To approve a re-drafting of the Tender and Contract Regulations to reflect the proposed changes (and clarifications), to be reported to the Constitution Working Group with a view to seeking recommendations from the General Purposes Committee and/ or the Executive Mayor in Cabinet for onward recommendations to Full Council.

DETAIL OF YOUR REPORT

1. BACKGROUND

- 1.1 The Council has a large pipeline of procurement activity, and to date has been reactive in managing this. This has resulted in some procurement processes starting later than desired, and without strategic planning of a pipeline of activity. By comparison with other Councils, Croydon is yet to publish annual procurement plans and undertake forward longer-term planning of procurements.
- 1.2 Managing the Council's contracts better was a Mayoral manifesto commitment and the changes set out in this report will help to deliver that pledge.

- 1.3 As noted by the Improvement and Assurance Panel in their report of the 30th April 2021, Council processes are complex, administratively burdensome and subject to poor oversight and governance:

“The Improvement and Assurance Panel noted that the Council’s arrangements for ensuring that contracts deliver value is poor. There has been a lack of a strategic approach to securing contracts, confusion in commissioning intent and a lack of a systematic approach to monitoring performance.

The Council has recognised this and has produced a Contracts Improvement Plan which is currently going through the process of adoption. While that happens, an interim plan is ensuring that its principles are applied. This plan will put in place sound governance arrangements, an annual set of commissioning intentions that will align with budgets and effective performance management.”

- 1.4 The Contracts Improvement Plan was overseen by a working group which included the Lead Member for Finance and Resources, the Assistant Chief Executive, an LGA Procurement specialist and was supported by the Improvement and Assurance Panel.
- 1.5 Following a re-structure to the Council’s Commissioning and Procurement Directorate, a central Strategic Procurement and Governance Service was formed, and the Contracts Improvement Plan was expanded into a Procurement Improvement Plan.
- 1.6 The delivery of the Procurement Improvement Plan is now overseen by the Finance, Risk and Assurance Internal Control Board.
- 1.7 Through the development of the Procurement Improvement Plan, procurement governance processes specifically were recognised as cumbersome, with multiple and duplicate approvals at various stages. Elected members were often engaged late in the process with little scope to influence the strategy or intended outcomes, the process and approach to be taken or social value opportunities.
- 1.8 An Annual Procurement Plan will improve transparency with much earlier engagement of Councillors to be able to influence at the strategy stage of procurements.
- 1.9 Thorough involvement from members at the procurement strategy stage will assure them that a compliant tender process that produces a winning bidder will meet the strategic needs of the Council.
- 1.10 With this first step in place, further political approval at the procurement award stage wouldn’t be required. The evaluation of a tender follows strict regulatory processes, which once a result is produced, there are no other options other than to award or to not award the contract to the identified winning bidder. It is therefore proposed that in the majority of cases, the contract award can be delegated to the Corporate Director for the service.

- 1.11 Following the new Mayoral model, there are currently no procurement delegations in place for contract awards with a value over £500k. This creates a bottleneck of approval sign offs which can lead to extended periods of time between evaluating tender bids and informing bidders of the outcome and slows down the process considerably.
- 1.12 There are new requirements for Councils to publish a Commercial Procurement Pipeline (Procurement Policy Notice (PPN) 05/21), which will improve the market's ability to prepare for forthcoming procurements. The proposed Annual Procurement Plan will form the basis of the Council's published Commercial Procurement Pipeline.
- 1.13 The Commercial Procurement Pipeline will indicate to the market the list of potential tendering opportunities, with an estimated contract value per project. This is a maximum estimated contract value and not a budget commitment, and the Council will seek to make best use of the competitive processes, available frameworks and collaborative working with other boroughs or organisations to achieve optimum value.
- 1.14 Although an Annual Procurement Plan would usually cover the period of a financial year to align with the budgetary processes, the first one would cover the period from November 2022 to March 2023 and then a full Annual Procurement Plan would commence in April 2023 until March 2024.
- 1.15 The Council's Tenders and Contracts Regulations (TCR's) 23rd March 2022 (Part 4.1 of the Council Constitution) was updated in March with some minor amends. A new re-refresh of the regulations would be required to reflect the wider changes proposed within this report.

2. CONSULTATION

- 2.1 The plan for a new process was presented to CMT on 26th July 2022 where it gained full support. There is no requirement for external consultation as this is an internal process.
- 2.2 The governance process will be further reviewed once the new Transforming Public Procurement Bill is enacted into law 2023-2024.

3. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 3.1 The Report in the Public Interest identified a lack of systemic clear governance processes in place at the Council.
- 3.2 The Procurement Improvement Plan, along with the further council wide work to improve governance, identified the need to improve the efficiency of the decision-making processes for awarding contracts.
- 3.3 This new proposed process will ensure that engagement with the Executive Mayor and Cabinet Members is more strategic, meaningful, and earlier in the process, and provide visibility of the procurement pipeline.

- 3.4 The new proposed process will provide efficiency in decision making. At present the Executive Mayor makes all required decisions for contract awards over £500k. This new process provides an opportunity to agree in advance which decisions will be taken by the Executive Mayor, and those which can be delegated to Cabinet Members or officers (including, where relevant, key decisions).
- 3.5 It is envisaged that aside from the most high-profile contracts, Procurement Strategy decisions will usually be delegated to the Cabinet Member, and Procurement Award decisions will usually be delegated to the relevant Corporate Director. However, the full list of delegations will be proposed and agreed within each Annual Procurement Plan report to Cabinet.
- 3.6 Any delegations requiring a Key Decision would be limited to the Executive Mayor, Lead Member or Chief Officers as defined in and in accordance with the Constitution. Where a delegated decision is a Key Decision to Officers, it must be made in consultation with the Lead Cabinet Member
- 3.7 Delegations will be proposed on a basis of risk, sensitivity, and contract value, and will include permitted extensions and variations. This will enable Members to engage and influence at the strategy stage of a procurement rather than the contract award stage, except for contracts of substantial public or political sensitivity. By engaging with Members at the strategy stage, the process of the awarding of a contract is stand alone and can be proven to be based purely on evaluation of returns to tender documentation.
- 3.8 Approvals would be simplified and accelerated, ensuring a more strategic deployment of resources for the procurement service and the wider organisation whilst ensuring that any changes maintain rigour with clear accountabilities for decision making and improved transparency.
- 3.9 Procurement Policy Notice (PPN) 05/21 requires the publication of a Commercial Procurement Pipeline, and this new process will enable the Council to be compliant with this requirement.
- 3.10 An additional benefit to this process is that the Council will be easier to do business with and more attractive to suppliers and SME's who will be able to understand the pipeline of future procurements and prepare accordingly.
- 3.11 Decisions delegated to officers shall be exercisable only once recommendations are made from Procurement Board / the Contracts & Commissioning Board in the usual way and shall be referred back to the Executive Mayor for a decision or for an updated delegation if any of the following thresholds for changes have been exceeded:
- i. Contract value exceeds that proposed in the APP/Quarterly Update Report, by the lesser of £500K or 25%, or the new aggregate value exceeds £1m and it becomes a key decision
 - ii. Substantial / material changes to procurement from that defined in the APP/Quarterly Update Report e.g. material risks are identified

- 3.12 For example, if a procurement with a proposed £5m contract value returns a winning bid of £5.4m, this would not be referred back as it does not exceed either the £500k or 25% threshold, and it would already be a key decision. However, a proposed £800k contract value that returns a winning bid of £1.1m would be referred back as it represents a 37.5% increase and is also now a key decision.
- 3.13 A substantial change would include where a material risk has been identified, such as a financial or legal risk. For example, if the decision would now potentially have a greater impact on allocated budget than first envisaged; or where a material risk of procurement challenge is identified.
- 3.14 The Contracts & Commissioning Board will be responsible for tracking the threshold tolerances and ensuring that any that exceed the agreed thresholds follow the referral route as described above. The Board will also be responsible for tracking the delivery of the APP plan and escalating to the Council's Corporate Management Team where the proposed dates are at risk of not being met.
- 3.15 Where approval for a strategy, award, extension or variation with an aggregated value of £500k or over has not been included in the forward planning of procurements these will either be approved through the full Mayoral decision process that is currently in place or added to the APP at the next quarterly update.
- 3.16 The existing delegations to the Chair of the Contracts & Commissioning Board for contract strategy, award, extension or variation decisions with an aggregated value of between the Low Value Threshold (£177,898) and £500k in the Tenders and Contracts Regulation shall remain the same to the extent they do not otherwise conflict with this report. Existing delegations to officers also remain the same to the extent they do not otherwise conflict with this report.

4. OPTIONS CONSIDERED AND REJECTED

- 4.1 Do nothing – This would result in a non-compliance with the requirement for the Council to publish their commercial procurement pipeline in accordance with Procurement Policy Notice (PPN) 05/21. There would also be no forward planning and therefore no reduction in timescales for signing off procurements, re-procurements, variations and extensions. **NOT RECOMMENDED**
- 4.2 Only do what is required under PPN 05/21 requirement i.e. publish commercial procurement pipeline but not implement the further governance improvements for allowing Members to engage and influence at strategy stage. This would not allow for more efficient procurement decisions with earlier engagement with Members. **NOT RECOMMENDED**
- 4.3 Adopt an annual cycle of presenting an annual procurement forward plan and agreeing delegations in advance. **RECOMMENDED**

5. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

5.1 Financial

5.11 There are no direct financial considerations with the proposals which relate to improving processes other than those already set out in the report. Improving procurement governance is to be welcomed given the significant levels of contractual spend that the Council incurs and the need to ensure the Council achieves value for money from its contracts.

5.2 Risks

5.21 There are no direct risks that have been identified as a result of implementing this proposed process, other than those already set out in the report and the mitigation in place with regard to tolerances.

5.22 There are wider risks with regard to publishing a forward programme of procurement, for example projects could emerge throughout the year which weren't included within the overall programme. This could lead to less efficient process and a missed opportunity for potential suppliers to prepare, or for shared procurement with other partners such as the NHS or other Councils.

5.23 Additionally, publishing a planned procurement that doesn't go ahead or is significantly delayed could raise expectations within the market and damage the Council's reputation.

Approved by: Alan Layton on behalf of Jane West Corporate Director of Resources (Section 151 Officer)

6. LEGAL CONSIDERATIONS

6.1 The Head of Commercial & Property Law comments on behalf of the Director of Legal Services & the Monitoring Officer that:

6.2 The Executive Mayor has the power to exercise executive functions pursuant to s9E of the Local Government Act 2000 and has the power to delegate those functions. This report seeks relevant delegations to exercise executive functions.

6.3 In relation to any contract award/ variation decisions that are key decisions, any delegations shall be limited to "Chief Officers" as defined in the Council's Constitution, meaning: *a) the Head of Paid Service; b) the Chief Finance Officer; c) the Monitoring Officer; d) a Statutory Chief Officer; e) a Non-Statutory Chief Officer*. Corporate Directors fall within the definition of "Non-statutory Chief Officer", which has the same meaning as in section 2(7) the Local Government and Housing Act 1989 and includes officers who directly report to the Head of Paid Service/ Chief Executive.

6.4 At present the delegations in the Council's Tenders and Contracts Regulations have been superseded by the Executive Mayor's Scheme of Delegation following the introduction of the Mayoral Model. As such, both the Mayor's

Scheme of Delegation and the Tenders and Contracts Regulations will require updating in order to reflect the recommendations in this report, if approved.

- 6.5 The Council's Tenders and Contracts Regulations are contained within the Council's Constitution. As such, any amendments to these Regulations will need to be approved by Full Council in accordance with Article 15 of the Constitution: *"changes to this Constitution shall only be approved by the Full Council after consideration of written proposals made by the Mayor, Cabinet, General Purposes Committee or Monitoring Officer and the submission of a recommendation to a meeting of the Council. Changes approved by the Council shall take effect from the conclusion of the meeting at which those changes are agreed unless the recommendation specifies otherwise"*.
- 6.6 The General Purposes Committee recently approved the setting up of a Constitution Working Group (meeting of 29th September 2022, item number 4) and the scope of their review includes the following specific changes: *Part 4.1 – Tenders and Contracts Regulations 2022 - General review and update in light of recent governance reviews and reports and the Mayor's Scheme of Delegation*. As such, any amendments to the Tenders and Contracts Regulations should be considered by the Constitution Working Group in the first instance, for onward recommendations to Full Council.
- 6.7 The Procurement Policy Notice (PPN) 05/21 sets out information and guidance for contracting authorities on the National Procurement Policy Statement (NPPS) which will require contracting authorities to have regard to national strategic priorities for public procurement. The PPN applies to all contracting authorities, including local authorities.
- 6.8 The PPN states that:
- The Government intends to bring forward legislation when Parliamentary time allows to ensure that:*
- *all contracting authorities are required to have regard to the National Procurement Policy Statement when undertaking procurements;*
 - *contracting authorities with an annual spend of £200m or more are required from April 2022 to publish procurement pipelines and to benchmark their procurement capability;*
 - *contracting authorities with an annual spend of £100m or more are required from April 2023 to publish procurement pipelines and to benchmark their procurement capability*
- 6.9 The legislation referred to above is the Procurement Bill, which will likely be enacted in 2023. The government has committed to provide at least six months' notice of the regime coming into force from when the legislation is concluded. The Procurement Bill will introduce a new public procurement regime. It is to be noted that further changes to the Council's Tenders and Contracts Regulations will be required as a result.

7. HUMAN RESOURCES IMPACT

- 7.1 There are no immediate Human Resource impacts arising from the content of this report for the Council employees or staff.

Approved by: Gillian Bevan, *Head of HR Resources and Assistant Chief Executives* on behalf of the Chief People Officer

8. EQUALITIES IMPACT

- 8.1 The Council has an obligation under the Public Sector Equality Duty, which is to eliminate unlawful discrimination, to advance equality of opportunity and to build better relationships between groups with protected characteristics.

- 8.2 The Council is also obligated to comply with the Equalities Act and UK Law to meet the Council's Contract procedure rules and best practice. In accordance with legislation the Council will need to consider and take proactive steps at every strategic stage, to ensure diversity of third-party suppliers and to assess the presence of the equality of opportunity for, staff, residents and for contracted business. The council are also responsible for ensuring that external contractors are meeting the Public Sector Duty and are not unlawfully discriminating. The compliance with the Equality Act 2010 should be demonstrated in relevant equalities considerations throughout the procurement process to ensure that each function meets the requirements of the Equalities Act.

Approved by: Gavin Handford Director of Policy, Programmes and Performance.

9. ENVIRONMENTAL IMPACT

- 9.1 Through improved planning environmental impact of procurements could be more thoroughly addressed

10. CRIME AND DISORDER REDUCTION IMPACT

There are no crime and disorder impacts expected from this decision

11 DATA PROTECTION IMPLICATIONS

- 11.1 **WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF 'PERSONAL DATA'?**

NO

(If yes, please provide brief details as to what 'personal data' will be processed and complete the next question).

(If no, please complete the sign off)

11.2 HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN COMPLETED?

NO

(If yes, please attach a copy).

(If no, please provide the reason why a DPIA was not completed. Please also attach any relevant advice)

There are no data protection implications expected from this decision.

CONTACT OFFICER: Scott Funnell, Head of Strategic Procurement & Governance

APPENDICES TO THIS REPORT:

Appendix 1 – Annual Procurement Plan

BACKGROUND DOCUMENTS – LOCAL GOVERNMENT ACT 1972

[For executive decision making it is a requirement that all Part A (open) reports & Part B reports (closed) must list and provide an electronic and a printed copy of all background reference.]

Improvement and Assurance Panel Report 30th April 2021

Name of Procurement /Contract	Est Total Contract Value	Procurement Intention	Planned Event Date	Estimated Contract Start Date	Contract Length (months)	Extension (months)	Directorate	Recommended Approver for Procurement Strategy	Recommended Approver for Award/Extension	Key Decision
CCTV Supply, Installation & Maintenance	£2,889,000	Reprocure	15/12/22	01/06/23	36	24	SCRER	CM for Community Safety	CD SCRER	Yes
Passenger Transport Minibus Contract Lot 3 Various Routes	£2,232,538	Reprocure	15/01/23	01/09/23	TBC	TBC	SCRER	CM for CYP	CD SCRER	Yes
Hard FM Term Maintenance Contractor	£35,000,000	Reprocure	01/03/23	07/07/23	60	24	Resources	CM for Finance	CD Resources	Yes
Laptop refresh programme	£4,500,000	Reprocure	01/01/23	01/04/23	36	12	ACE	CM for Finance	CD ACE	Yes
London Grid for Learning IT services	£1,031,000	Reprocure	01/01/23	01/04/23	60		ACE	CM for Finance	CD ACE	Yes
Legal Panel Contract for the Insurance London Consortium	£850,000	Reprocure	31/01/23	01/08/23	TBC	TBC	Resources	CM for Finance	CD Resources	No
Floating Support for LD, ASD & MH	£4,415,255	Reprocure	01/05/23	01/11/23	TBC	TBC	ASCH	CM for Health and Adult SC	CD ASCH	Yes
Advocacy	£1,691,255	Reprocure	31/03/23	15/03/2024	60	36	ASCH	CM for Health and Adult SC	CD ASCH	Yes
Healthwatch	£775,000	Reprocure	11/11/22	01/04/23	36	24	ASCH	CM for Health and Adult SC	CD ASCH	No
Emergency Accomodation Spend	£11,000,000	New Procurement	03/01/23	01/10/23	48		Housing	CM for Homes	CD Housing	Yes
Retrofit Contractor	£3,700,000	New Procurement	15/12/22	01/04/23	TBC	TBC	Housing	CM for Homes	CD Housing	Yes
Housing Professional Consultancy Services	£2,500,000	New Procurement	01/03/23	01/09/23	60		Housing	CM for Homes	CD Housing	Yes
Street Homelessness Outreach and Resettlement Service	£1,263,680	Reprocure	05/01/23	01/07/23	36	24	Housing	CM for Homes	CD Housing	Yes
Grounds Maintenance – Vehicle and Plant Procurement	£1,360,000.00	New Procurement	01/01/23	06/01/23	12		SCRER	CM for Streets & Environment	CD SCRER	no
Croydon Carers Assessment, Health and Wellbeing Service	£1,888,232	Extend & Vary	01/12/22	01/04/23	12		ASCH	n/a	CD ASCH	Yes
PMI Mulalley's General Building Works	£210,000,000	Extend	31/03/23	01/04/24	36		Housing	n/a	Exec Mayor in Cabinet	Yes
SLCP APPA - Residential and IFA Provision for LAC	£56,000,000	Re-open DPS	12/10/22	22/01/2023	n/a	n/a	CYPE	n/a	CD CYPE	Yes
Section 75 Public Health Nursing	£29,285,000	Extend	05/01/23	01/08/23	12		ACE	n/a	CD ACE	Yes
PMI Electrical Works	£26,000,000	Extend & Vary	30/12/22	30/01/23	27		Housing	n/a	CD Housing	Yes
Section 75 Sexual Health	£15,050,000	Extend & Vary	01/12/22	01/04/23	12		ACE	n/a	CD ACE	Yes
PMI Lifts (Inc Corporate Assets)	£11,000,000	Extend & Vary	30/12/22	30/01/23	27		Housing	n/a	CD Housing	Yes
PMI Partnering Advisory	£3,680,000	Extend	01/12/22	03/01/23	36		Housing	n/a	CD Housing	No
Adults & Childrens Social Care System	£2,989,000	Extend	31/01/23	19/03/23	36	24	CYPE	n/a	CD ASCH	No
PFI Older People Residential Care Homes and Extra Care	£2,850,000	Extend & Vary	01/01/23	01/04/23	6		ASCH	n/a	CD ASCH	Yes
Floating Support for LD & ASD	£2,724,000	Extend	01/12/22	01/01/23	12		ASCH	n/a	CD ASCH	Yes
Supervised Contact	£2,133,000	Extend	15/12/22	01/01/23	12		CYPE	n/a	CD CYPE	Yes
Advocacy	£1,691,255	Extend & Vary	24/11/22	12/01/22	18		ASCH	n/a	CD ASCH	Yes
Floating Support for MH	£1,150,600	Extend & Vary	01/12/22	01/01/23	7		ASCH	n/a	CD ASCH	Yes
Primary Care Contracts	£1,126,000	Extend & Vary	01/01/23	01/03/23	12		ACE	N/A	CD ACE	Yes
GP and Pharmacy Health checks delivery	£1,043,840	Extend & Vary	01/01/23	01/03/23	12		ACE	N/A	CD ACE	Yes
Joint Children's SL Therapy and Occupational Therapy	£862,528	Extend & Vary	12/01/23	01/01/23	6		CYPE	n/a	CD CYPE	No
Transportation of bodies Sutton and Croydon	£616,000	Extend	30/11/22	15/12/22	24		ACE	n/a	CD ACE	No
Browne Jacobson Legal services contract	£17,500,000	Extend	01/12/22	01/01/23	60	24	Resources	n/a	CD Resources	No
OHMS Housing IT system	£755,000	Extend & Vary	30/11/22	01/12/22	12		Housing	N/A	CD ACE	No
Capita One Education management system	£1,088,000.00	Extend & Vary	31/01/23	01/04/23	12		CYPE	N/A	CD ACE	no
Servelec Education Management System	£1,129,000	Extend	31/01/23	17/03/23	120	24	CYPE	N/A	CD ACE	no
Housing Responsive Repairs	£270,000,000	Reprocure	06/06/22	01/08/23	80	48	Housing	Strategy approved at Cabinet	Exec Mayor in Cabinet	Yes
PFI Older People Residential Care Homes and Extra Care	£113,454,990	Reprocure	12/01/22	01/10/23	60	120	ASCH	Strategy approved at Cabinet	Exec Mayor in Cabinet	Yes
Trees and Woodlands	£7,500,000	Reprocure	21/10/22	01/04/23	120		SCRER	Strategy approved at Cabinet	CD SCRER	Yes
Disrepairs Works	£4,400,000	New Procurement	01/12/22	01/04/23	24		Housing	Strategy approved at PB	CD Housing	Yes
Provision of Fire Risk Assessment	£1,130,000	Reprocure	01/12/22	01/04/23	60		Housing	Strategy approved at PB	CD Housing	Yes
Leasehold RTB insurance and Property and Liability Insurances	£3,230,715	Reprocure	05/09/22	01/04/23	60		Resources	Strategy approved at PB	CD Resources	Yes
Stock Condition Survey	£1,000,000	New Procurement	10/09/22	20/12/22	60		Housing	Strategy approved at PB	CD Housing	Yes
Outsourced ICT Services Azure support	£743,000	Reprocure	01/06/22	01/04/23	48		ACE	Strategy approved at PB	CD ACE	No
Outsourced ICT Services Hardware Break Fix Support	£660,000	Reprocure	01/06/22	01/04/23	60		ACE	Strategy approved at PB	CD ACE	No
Outsourced ICT Services Network Connectivity	£500,000	Reprocure	01/06/22	01/04/23	60		ACE	Strategy approved at PB	CD ACE	No
IT Service Management System Licences and Support	£480,000	Reprocure	01/06/22	01/02/23	72		ACE	Strategy approved at PB	CD ACE	No

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REPORT TO:	CABINET 16th NOVEMBER 2022
SUBJECT:	CONTRACT MANAGEMENT FRAMEWORK
LEAD OFFICER:	SCOTT FUNNELL HEAD OF STRATEGIC PROCUREMENT AND GOVERNANCE
CABINET MEMBER:	COUNCILLOR CUMMINGS CABINET MEMBER FOR FINANCE COUNCILLOR WARD DEPUTY CABINET MEMBER FOR CONTRACT MANAGEMENT
WARDS:	ALL

SUMMARY OF REPORT:

The Council has made a commitment to review and manage contracts better to seek best value through the procurement of contracts, and then to undertake a thorough oversight of the delivery of those contracts to ensure that the terms and performance levels associated with that agreement are strictly enforced.

The Council has researched best practise in the development of a Contract Management Framework, with value for money at the heart of its principles and a standardised yet proportionate approach. Corporate oversight of this framework will improve the management of risks within the Council's supply chain.

FINANCIAL IMPACT:

There is limited direct financial impact related to training. Whilst some fully funded external training has been secured through the Cabinet Office Contract Management Pioneer Programme, there will remain a requirement to source some training for all contract managers within the Council.

KEY DECISION REFERENCE NO: [insert number if applicable/not a key decision]

Approval of these recommendations would not constitute a key decision.

The Executive Mayor in Cabinet is recommended to make the decisions set out below:

RECOMMENDATIONS:

1. To approve the adoption of the Contract Management Framework as set out in this paper and the associated appendices
2. To approve the Contract Management Policy (Appendix 1) as an official policy of the Council.

3. To approve a re-drafting of the Tender and Contract Regulations to reflect the proposed changes (and clarifications), to be reported to the Constitution Working Group with a view to seeking recommendations from the General Purposes Committee and/ or the Executive Mayor in Cabinet for onward recommendations to Full Council.

DETAIL OF YOUR REPORT

1. BACKGROUND

- 1.1 Effective Contract Management has proven to deliver a range of benefits including improved outcomes for service users, added social value, reduced cost, reduced risk, and increased innovation. This is a key area for improvement identified by the Council and the Executive Mayor of Croydon's manifesto which also set out the need to introduce robust contract management to ensure efficient, value for money services.
- 1.2 Improved management of the Council's contracts was a Mayoral manifesto commitment and the changes set out in this report will help to deliver that pledge.
- 1.3 The past few years have seen the Council experience significant challenges to how it manages its contracts and suppliers. The Improvement and Assurance Panel in its report of 30 April 2021 noted the requirement to improve the management of contracts.
- 1.4 The Second Report of the Improvement and Assurance Panel dated 30 April 2021 identified that:

"The Improvement and Assurance Panel noted that the Council's arrangements for ensuring that contracts deliver value is poor. There has been a lack of a strategic approach to securing contracts, confusion in commissioning intent and a lack of a systematic approach to monitoring performance.

The Council has recognised this and has produced a Contracts Improvement Plan which is currently going through the process of adoption. While that happens, an interim plan is ensuring that its principles are applied. This plan will put in place sound governance arrangements, an annual set of commissioning intentions that will align with budgets and effective performance management."

- 1.5 The Contracts Improvement Plan was overseen by a working group which included the Lead Member Finance and Resources, the Assistant Chief Executive, an LGA Procurement specialist and was supported by the Improvement and Assurance Panel.

- 1.6 Following a re-structure to the Council's Commissioning and Procurement Directorate, a central Strategic Procurement and Governance Service was formed, and the Contracts Improvement Plan was expanded into a Procurement Improvement Plan.
- 1.7 The Procurement Improvement Plan is now overseen by the Finance, Risk and Assurance Internal Control Board.
- 1.8 This improvement plan includes the introduction of a standardised and proportionate method of contract management across the Council, alongside relevant tools and training.
- 1.9 Although contracts are currently being managed within the Council, there is no standardised framework for contract managers to work within, no centralised support for contract managers and no formal corporate reporting of how contracts are performing.
- 1.10 A new Contract Management Framework (CMF) would aim to ensure that contracts are delivering best value and to foster long-term collaborative relationships with suppliers that strive for continuous improvement in service delivery and efficiencies. It will also provide greater corporate oversight into the performance of our suppliers and the progress of our contracts against our corporate priorities. The new framework will allow a corporate 'One Council' lens on individual contractors that are used by a range of services so that relationships can be managed more effectively, potentially giving services more leverage to improve supplier performance.
- 1.11 The adoption of a CMF is widespread practice amongst much of the public sector. Whilst there is no single standard approach, there is a plethora of good practice principles and guidelines designed by the Cabinet Office (the Crown Commercial Service and the Government Commercial Function), the National Audit Office (NAO), and the Local Government Association (LGA).
- 1.12 The seven principles that the Council has applied when developing the framework are as follows:
 1. Achieve best value for money for the Council and our residents, driving continuous improvement and innovation.
 2. Corporate oversight of contracts and appropriate internal controls to manage risk and enable strategic oversight.
 3. Council-wide standardised approach to contract management, with clarity on roles and responsibilities.
 4. Proportionate management and reporting on contracts based on risk, value and complexity.
 5. Apply modern day best practices to contract management, utilising advice and training from central government and expert organisations.
 6. Simple to use processes, simplifying Council governance throughout the procurement cycle.

7. A Co-designed Framework with contract managers across the Council, ensuring that successful delivery of contracts is best achieved through a joined-up and communicative approach.

1.13 The CMF will consist of the following:

- Contract Management Policy - *public policy statement setting out how we will approach contract management at Croydon Council (Appendix 1)*
- Contract Management Handbook – *a handbook for anyone managing a contract or suppliers on behalf of the Council*
- Document repository – *a central repository on SharePoint containing contract documents*
- Toolkits and Templates – *online toolkit containing templates for contract administration, FAQs and troubleshooting, best practice guidance from Cabinet Office, CCS, NAO etc.*
- Corporate Performance reporting – *performance scorecards for top tier contracts to feed into corporate dashboard reports*
- Contract Management Training – *internal and external training programmes for contract managers*
- Digital contracts register and pipeline

Contract Tiering

- 1.14 A proportionate approach to managing contracts provides the most efficient use of Council resources, and the best practise is to apply a tiering system to contracts based on value, complexity, and risks. The Council had previously applied a tiering system to contracts based solely on value, however this led to approximately 80 contracts allocated the highest tiering. Best practice advice is to have fewer top tier contracts and focus the resource on managing these ones with greater rigor.
- 1.15 The new proposed tiering system would allocate each Council contract to a category from one of Platinum, Gold, Silver, and Bronze using the Government Commercial Function's Contract Management Classification Tool. This has resulted in 13 Platinum, 25 gold and 38 silver tiered contracts, with the remaining contracts allocated a bronze tiering. The list of proposed contract tiering is at **Appendix 2**.
- 1.16 The classification will then determine the appropriate resources, governance, and reporting requirements of each contract. A summary of the requirements for each tier can be found in **Appendix 3**.
- 1.17 The proposals will apply to contracts within scope of the Council's Tenders and Contracts Regulations, which contains references to managing contracts. These references are largely compatible with the proposals in this report, but will be reviewed and considered in detail as part of recommendations to be reported to the Constitution Working Group with a view to seeking recommendations from the General Purposes Committee and/ or the Executive Mayor in Cabinet for onward recommendations to Full Council. As an interim plan until such approval by Full Council of the new Tenders and Contracts

Regulations, any incompatibility arising will be managed by adhering to the Tenders and Contracts Regulations whilst still seeking to ensure the principles in this report are applied.

- 1.18 Existing processes for managing contracts will alter to meet the requirements of the proposed CMF. This may not happen immediately if changes to existing contracts are required and will need to be considered within the current resourcing allocation for the management of individual contracts.
- 1.19 The Council has secured funding on the Cabinet Office *Contract Management Pioneer Programme – investing in commercial capability across local government*. This will invest in the Council's contract managers with a high quality and recognised training programme to commence in November 2022.

2. CONSULTATION

- 2.1 There is no requirement for external consultation as this is an internal process.
- 2.2 The plan for a new process was presented to CMT on 2nd August 2022 where it gained full support. Working groups were held with contract managers in Winter/Spring 2021-22. Further consultation will be held with contract managers through a Council Contract Managers Network established in October 2022
- 2.3 The contract management framework will be reviewed once the new Transforming Public Procurement Bill is enacted into law 2023-2024.

3. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 3.1 The Council has chosen to adopt the central government approach drafted by the Cabinet Office's Government Commercial Function, the adoption of which is being encouraged for the wider public sector.
- 3.2 This approach was chosen due to several factors:
 - The demonstrated success of contract management improvements within central government departments by adopting this model;
 - The level of support available online via toolkits and knowledge hubs;
 - The training programme created by the Cabinet Office in conjunction with the LGA and DLHUC to support local government contract management function which is based on this model;
 - The inclusion of contract management in the new Transforming Public Procurement bill which is likely to reflect some of these policies;
 - The validation from the National Audit Office to promoting good practice contract management using this approach.
- 3.3 A proposed timeline for implementation is set out below:

	Activity	Target Date
1	Joining the Contract Manager Pioneer Programme (CMPP) Senior Responsible Officer network	28 th September 2022
2	Establish Contract Manager Network for Croydon's CMPP attendees	25 th October
3	Finalise Contract Management Handbook and Toolkit	15 th November
4	Launch of Contract Management Framework – comms to stakeholders (contract managers, suppliers)	25 th November
5	CMPP to start	November – exact date tbc
6	Complete LGA's Self-Assessment for National Procurement Strategy for Local Government	10 th December
7	Finalise document repository and collated contract documents	10 th December
8	Issue performance scorecards to contract managers	12 th December
9	1 st set of Performance scorecards returned for Q3	18 th January 2023
9	1 st dashboard reports for Platinum and Gold contracts	24 th January
10	1 st review of Contract Management Framework	15 th March
11	Cabinet Office Commercial Continuous Improvement Assessment Framework (CCIAF)	April

4. OPTIONS CONSIDERED AND REJECTED

4.1 There are many options for contract management strategies that can be adopted by a contracting authority. There is no hierarchy of models nor a particular preference by local government bodies. In fact, there are several models and approaches created by professional organisations for the public sector that could be adopted.

4.2 **Option 1:** Don't do any active contract management and trust suppliers to carry out their contractual requirements without any oversight.
NOT RECOMMENDED

4.3 **Option 2:** Maintain existing arrangements. Continue to manage the Council's contracts at a local level with no corporate oversight or central reporting, with no standardised methods in place or support for contract managers.
NOT RECOMMENDED

4.4 **Option 3:** Introduce the proposed new contract management framework as set out in this paper. **RECOMMENDED**

5 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

5.1. The Head of Finance for Resources and the Assistant Chief Executive's Department comments on behalf of the Director of Finance.

5.2 Managing contracts more effectively and providing corporate oversight will lead to improved financial controls over contract spend. It will also help to highlight

areas that can be identified for savings targets, continuous improvement, and assist with assessing the impact of inflation on our contracts.

- 5.3 Good contract management also helps to ensure that good performance outcomes are achieved.
- 5.4 The corporate oversight and reporting will be delivered by existing resources in the Strategic Procurement and Governance team. It is not envisaged at this stage that any additional resource will be required to manage contracts. Contracts already have identified contract managers to oversee the delivery of contracts. The introduction of the framework will provide Contract Managers with the tools required to ensure an effective and standardised approach, as well as the required oversight. The new CMF may require contract managers to re-prioritise their work to meet the requirements of the framework but ultimately this should deliver more value.
- 5.5 A small resource may need to be allocated to a programme of contract management training. This is yet to be scoped but would be bid for from the Council's centralised training budget overseen by the Learning and Development Board.
- 5.6 Finance have been consulted and can confirm that the report reflects accurately the financial impact of the various options.
- 5.7 Approved by: Lesley Shields, Head of Finance for Resources and the Assistant Chief Executive's Department on behalf of the Director of Finance.

6. LEGAL CONSIDERATIONS

- 6.1 The Head of Commercial & Property Law comments on behalf of the Director of Legal Services and Monitoring Officer that the recommendations in this report seek to improve contract monitoring, governance of contracts, and ensure best value.
- 6.2 The Council is under a general Duty of Best Value to make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness (Section 3 of the Local Government Act 1999 (as amended by s137 of the Local Government & Public Involvement in Health Act 2007)).
- 6.3 The Executive Mayor has the power to exercise executive functions pursuant to s9E of the Local Government Act 2000. The adoption of a contract management policy is within the power of the Executive.
- 6.4 The proposals in this report will apply to contracts within scope of the Council's Tenders and Contracts Regulations, contained within the Council's Constitution. As such, any amendments required to these Regulations will need to be approved by Full Council in accordance with Article 15 of the Constitution: "changes to this Constitution shall only be approved by the Full Council after consideration of written proposals made by the Mayor, Cabinet, General Purposes Committee or Monitoring Officer and the submission of a recommendation to a meeting of the Council. Changes approved by the Council

shall take effect from the conclusion of the meeting at which those changes are agreed unless the recommendation specifies otherwise”.

- 6.5 The General Purposes Committee recently approved the setting up of a Constitution Working Group (meeting of 29th September 2022, item number 4) and the scope of their review includes the following specific changes: “*Part 4.1 – Tenders and Contracts Regulations 2022 - General review and update in light of recent governance reviews and reports and the Mayor’s Scheme of Delegation*”.
- 6.6 Paragraph 1.16 of this report explains how any incompatibility arising between the Tenders and Contracts Regulations and the proposals in this report will be managed in the interim.
- 6.7 Approved by Kiri Bailey, Head of Commercial & Property Law on behalf of the Director of Legal Services & Monitoring Officer

7. HUMAN RESOURCES IMPACT

- 7.1 There are no expected Human Resources impacts arising from the content of this report other than the appropriate training required for contract managers.

Approved by: *Gillian Bevan, Head of HR Resources and Assistant Chief Executives* on behalf of the Chief People Officer

8. EQUALITIES IMPACT

- 8.1 The Council has a statutory duty, when exercising its functions, to comply with the provisions set out in the Sec 149 Equality Act 2010. The Council must, in the performance of its functions, therefore have due regard to:
- (a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
 - (b) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
 - (c) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 8.2 When a service is contracted out both the contractor and the public authority that commissioned the service have to give due regard to the three principles of the General Duty as set out above. Any supplier that is exercising public functions also has an obligation to fulfil the general duty.
- 8.3 The Contract Management Framework is required to work within the framework of the Equality Strategy 2020- 2024. The deliverables in the Equalities Strategy should be incorporated into the Contract Management Framework and policy documents as detailed below:

“Outline how the proposed contract(s) will comply with the Public Sector Equality Duty outlined in Section 4 of the EQIA; and meet the outcomes of the Council’s equality strategy, particularly:

- (i) All Council contracts contribute towards delivering our equality objectives
- (ii) Council contractors are inclusive and supportive of vulnerable groups
- (iii) Ensure that every strategy, delivery plan, council contract and staff appraisal has an equality objective linked to it.
- (iv) That contractors be requested to adopt Croydon’s Equality and George Floyd Race Matters Pledges”

8.4 The Equalities Strategy including the Pledges named above, are provided to all bidders during the tendering stage of the procurement process. Social Value objectives also mirror the Council’s commitments to equalities and diversity.

8.5 Approved by: Denise McCausland – Equality Programme Manager

9. ENVIRONMENTAL IMPACT

9.1 There is no Environmental Impact expected as a result of this decision

10. CRIME AND DISORDER REDUCTION IMPACT

10.1 There are no Crime and Disorder Reduction Impacts expected as a result of this decision

11 DATA PROTECTION IMPLICATIONS

11.1 **WILL THE SUBJECT OF THE REPORT INVOLVE THE PROCESSING OF ‘PERSONAL DATA’?**

NO

11.2 **HAS A DATA PROTECTION IMPACT ASSESSMENT (DPIA) BEEN COMPLETED?**

NO

A DPIA has not been completed as the adoption of this recommendation would not constitute handling any data that requires a DPIA.

CONTACT OFFICER: Scott Funnell, Head of Strategic Procurement & Governance

APPENDICES TO THIS REPORT:

Appendix 1 – Contract Management Policy

Appendix 2 – Proposed Council Contract Tiering

Appendix 3 – Summary of requirements for Contract Management Tiers

BACKGROUND DOCUMENTS – LOCAL GOVERNMENT ACT 1972

There are no applicable background documents.

Contract Management Policy

London Borough of Croydon

Strategic Procurement & Governance,
Commercial Investment, Resources Directorate

Policy date and version: September 2022, v.1.9

Approved by CMT: (TBC); Cabinet: 16 November 2022 (TBC)

Next review date: September 2023

Purpose

The Contract Management Policy provides a clear, proportionate, and standardised approach to managing and administering contracts for goods, services and works purchased from suppliers by the London Borough of Croydon. The Policy informs our residents, suppliers, and potential suppliers of the Council's standard for managing such contracts. The Policy is one component of the Council's Contract Management Framework.

Our Contract Management Policy is based on seven core principles:

1. Achieve best value for money for the Council and our residents, driving continuous improvement and innovation where we can.
2. Corporate oversight of contracts and appropriate internal controls to manage risk and enable strategic oversight.
3. Adopt a Council-wide standardised approach to contract management, with clarity on roles and responsibilities.
4. Proportionate management and reporting on contracts based on risk, value, and complexity.
5. Apply modern day best practices to contract management, utilising advice and training from central government and expert organisations.
6. Simple to use processes, simplifying council governance throughout the procurement cycle.
7. Co-design and utilise the Framework with a network of contract managers across the Council, ensuring that successful delivery of contracts is best achieved through a joined-up and communicative approach.

What is Contract Management?

Contract Management is the management and administration of supply contracts, developed by client and suppliers, to ensure goods, works and services are delivered as agreed by all parties throughout the contract lifecycle. This may extend beyond the contract term where there may be ongoing obligations around maintenance, guarantees and warranties

Success criteria are that contractual obligations for agreed cost, quality, productivity, and frequency are met. Good contract management informs procurement planning and potential contract changes and variations in scope and price.

Why is Contract Management Important to the Council?

Effective management of supply contracts is essential in helping the Council achieve its corporate objectives and ensure best value is achieved after we have awarded our contracts. To ensure supplier efficiency and compliance requires management throughout the process.

Contract management is the critical phase in delivering the contracted goods and services in an ever-changing environment, whilst managing costs and risks, nurturing innovation, and seeking continuous improvement.

Good practice Contract Management can deliver the following outcomes:

Outcomes	Application to the Council
Business Benefits	Managing supplier performance to ensure suppliers are achieving our minimum expectations and embodying our values, maintaining quality throughout the contract term and identifying opportunities for future improvement and innovation.
Value for Money	Enables saving and benefit opportunities identified to be realised, ensuring contract deliverables are met, achievement of procurement outcomes, deliver social value outcomes, supply chain improvements to benefit SMEs and local economy, identifying savings opportunities.
Risk Management	Management of contractual risks and supplier failure risks, awareness and compliance with contractual and legislative obligations, managing unforeseeable or unplanned events that may impact contract costs, scope or deliverables.

Scope

This policy:

- applies to the Contract Award and Handover stage of the procurement lifecycle. This lifecycle is covered by the Council's Tendering and Contracts Regulations (TCRs) and the LBC Procurement Handbook;
- applies to all legally binding contracts except for employment contracts, Memorandums of Understanding (MoUs) and partnering agreements and collaborative contracts with other public bodies which may have local and bespoke arrangements in place.
- applies to all Council staff and contractors that are involved in the management of supplier contracts on behalf of Council.

Roles and Responsibilities

The roles and responsibilities within contract management will vary depending on the tier of the contract. A detailed RACI and Roles and Responsibilities can be found in the Contract Management Framework.

Contract Tiering

All contracts at LBC will be subject to tiering to ensure a proportionate risk-based approach to contract management. The Cabinet Office's Contract Tiering Tool is used to determine which contracts fall under these tiers. The Tool considers the value, the complexity, and the risks of the contract with regards to data handling and supplier failure, to determine a

classification. This will be conducted at the Pre-Procurement stage with reviews at Contract Award stage by the contracting service area and Strategic Procurement & Governance but may be subject to overrides where appropriate.

The classification determines the appropriate Resourcing, Governance and Reporting requirements of that contract, a summary table of which can be found in the Contract Management Framework. The descriptors of the tiering system can be found below:

Bronze	Silver	Gold	Platinum
Contract scope, value and risk			
<p>Low value, low risk contracts.</p> <p>Usually transactional in nature (PO only), loss of service easily restored or replaced.</p> <p>While there may be some interruption in supply arising from failure it would have less or minimal impact.</p>	<p>Lower value and less strategically important in the short-term but often critical to manage due to one or more of the elements of value, risk or complexity.</p>	<p>Major contracts, limited alternative providers that may impact on performance.</p> <p>These contracts may be long or medium term and support the delivery of the Council's priorities or its operations.</p>	<p>Strategic contracts or relationships that are considered high value and high risk.</p> <p>These are likely to be statutory services but can also include contracts that are a mix of statutory and non-statutory compliance services.</p>
Risk of non-performance or supplier failure and impact			
<p>Risk of supplier failure low.</p> <p>Supplier or performance failure would have a minimal to no political, financial, operational or reputational impact.</p> <p>Non-performance would not impact residents / the</p>	<p>Lower level of risk as there are opportunities for substitution or easily in-sourced.</p> <p>Non-performance may result in some impact on residents / the public / Council assets, with some or little market visibility.</p>	<p>Risk of non-performance may result in medium to high impact on residents / the public / Council assets.</p> <p>Non-performance would result in breaches of statutory duty or risk being non-compliant.</p>	<p>Risks associated are high impact on residents / the public / Council assets / Council services, with market visibility and/or critical effect.</p> <p>Non-performance would result in breaches of statutory duty or risk being non-compliant.</p> <p>Supplier or performance failure</p>

public / Council assets.	Some manageable operational impact on Council services. Supplier or performance failure would have a some or minimal political, financial, operational or reputational impact.	Supplier or performance failure would have a moderate and possibly manageable political, financial, operational or reputational impact.	would have significant political, financial, legal, operational, and/or reputational consequences.
Complexity to re-procure/ step-in/ substitute supplier			
Low level of risk as there are opportunities for substitution or easily in-sourced . The supply base is more competitive and substitutions can be implemented with less or no impact on residents / the public / Council assets.	Low level of risk as there are opportunities for substitution or easily in-sourced. Supply base more competitive but may be subject to market instability , requires support to ensure quality delivery.	May have a lower level of risk if there are opportunities for substitution or can be easily in-sourced.	Opportunity for substitution or in-sourcing would be complex and difficult
Contract Management			
A light-touch approach to contract monitoring, automating where possible.	Regular contract monitoring advised, reflective of the contract size/nature. Contract management may be done by a team or under a group of contracts.	Regular contract management required with a dedicated contract manager and quarterly corporate reporting.	Consistent contract management is essential . A dedicated contract manager ideally supported by a team, an executive senior responsible owner , monthly corporate reporting

Further details can be requested from: procurement@croydon.gov.uk

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Contract Title	Previous Tier	Directorate	Proposed Classification	Total Contract Value	Supplier
SLCP Approved Provider Panel Agreement for IFA and Residential	1	CYPE	Platinum	£89,000,000	Framework Agreement
SLWP Waste Disposal - Energy Recovery Facility	1	SCRER	Platinum	£540,000,000	Viridor
Outsourced ICT Services	1	ACE	Platinum	£28,369,282	Capita Secure Information Services
Section 75 Public Health Nursing	1	CYPE	Platinum	£17,571,000	Croydon Health Services
Fairfield Hall Operator Contract	1	SCRER	Platinum	£180,000,000	BH Live
Housing Responsive Repairs	1	Housing	Platinum	£270,000,000	Axis Europe
Household Waste and Recycling Centres	1	SCRER	Platinum	£21,000,000	Veolia Environmental Services Ltd
PMI General Building Works	1	Housing	Platinum	£210,000,000	Mulalley and Company Ltd
Next Generation of Highways Contract	1	SCRER	Platinum	£130,000,000	FM Conway
End User Services	1	ACE	Platinum	£6,800,000	Littlefish
SLWP Environmental Services (Phase C, Lot 1) waste collection, street	1	SCRER	Platinum	£216,000,000	Veolia Environmental Services Ltd
Street Lighting PFI	1	SCRER	Platinum	£150,000,000	SKANSKA LAING
Sport, Physical Activity and Leisure Services - Leisure Operator	1	SCRER	Platinum	£160,000,000	Greenwich Leisure Limited
Ashburton Learning Village PFI	1	CYPE	Gold	£78,000,000	Ashburton Services LTD
Adults & Childrens Social Care System	1	CYPE	Gold	£2,989,000	Liquid Logic
PMI Windows and Doors	1	Housing	Gold	£25,000,000	Anglian Building Products
PMI Electrical Works	1	Housing	Gold	£26,000,000	AJS Ltd
FM- Cleaning Services	1	Resources	Gold	£7,854,000	Churchill Services Ltd
19-25 specialist education and care provision	1	CYPE	Gold	£1,916,568	Croydon college
Design and Build of St Nicholas School	1	Housing	Gold	£21,324,087	Wilmott Dixon Construction
PMI Mechanical Heating	1	Housing	Gold	£28,000,000	Clairglow Heating Ltd
Emergency Accomodation Spend	1	Housing	Gold	-	Various
Grounds Maintenance Vehicles & Equipment	1	SCRER	Gold	£16,875,000	Ide Verde
Passenger Transport DPS	1	SCRER	Gold	£64,000,000	Various
Older People Residential Care Home Service (PFI)	1	ASCH	Gold	£67,476,923	Care UK
HardFM - mechanical and electrical maintenance	1	Housing	Gold	£35,000,000	Atalian Servest Ltd
Valo, Digital advertising, street furniture, bus shelters.	1	ACE	Gold	-£6,750,000	Valo Smart City Corporation
Utilities contract - Unmetered street lighting supplyHalf hourly meter	1	Resources	Gold	£20,108,354	Npower
Oracle Cloud Services	1	ACE	Gold	£2,139,782	Oracle Corporation UK Ltd
CCTV Supply, Installation & Maintenance	1	SCRER	Gold	£424,607	Chroma Vision Ltd
Domestic Violence Call off from IFA	1	Housing	Gold	£825,000	Hestia

Enforcement Agency Services	1	SCRER	Gold	-£9,000,000	Various - bristow and Sutor
Work and Health Programme	1	SCRER	Gold	£16,850,000	Reed in Partnership
HardFM - Building Maintenance	1	Resources	Gold	£17,500,000	Graham Facilities Management Ltd
Managed Service Provider for Temporary Agency Resources	1	ACE	Gold	£176,000,000	Adecco
PMI Lift and Escalator	1	Housing	Gold	£11,000,000	Guideline Ltd
Trees and Woodlands	1	SCRER	Gold	£8,310,000	City Suburban
Utilities Contract - Gas supply	1	Resources	Gold	£4,014,610	Corona Energy
Integrated Drug & Alcohol Engagement, Treatment & Recovery Service	1	ASCH	Silver	£18,588,340	Change, Grow, Live (CGL)
Integrated Sexual Health Service	1	ASCH	Silver	£20,275,647	Croydon Health Services
Single Homelessness Service - includes MH step down service, Palmer	1	ASCH	silver	£2,690,536	Evolve Housing & Support
PFI Caring for Croydon (Homes for the Future)	1	ASCH	Silver	£187,000,000	Caring 4 Croydon Ltd
Legal Services Contract - Corporate	1	Resources	Silver	£12,500,000	Browne Jacobson LLP
Northgate 7 year Hosted IT Solution for Revenue and Benefits	1	Resources	Silver	£1,350,000	NEC SOFTWARE SOLUTIONS UK LTD
Spot purchasing of IFAs	1	CYPE	Silver	£3,677,660	Spot Purchase
SEN NMI placements	1	CYPE	Silver	£11,600,000	Spot purchased across 90 providers
Alternative Education - Approved Provider Panel	1	CYPE	Silver	£2,460,694	Multiple - Approved Provider Panel
CWD Personal Care and Support Packages	1	CYPE	Silver	£5,598,536	Various
education management system	1	ACE	Silver	£1,196,587	Servelec
Spot purchasing of Semi-independents	1	CYPE	Silver	£20,581,522	Spot Purchase
Pensions Admin Software	1	Resources	Silver	£1,552,452	Heywood Ltd
DPS 3 Lot 3 - Semi-independent Accommodation	1	CYPE	Silver	£80,000,000	DPS - multiple providers
Spot purchasing of residential children's care	1	CYPE	Silver	£27,927,986	Spot Purchase
Best Start - Lot 1a & 1b North and Central Locality Children's Centre H	1	CYPE	Silver	£1,900,913	Crosfield Nursery School
Framework for Private Sector Property Refurbishment	1	Housing	Silver	£1,000,000	Various
Private Rented Access Scheme Ex-Offenders	1	Housing	Silver	£99,990	The Forward Trust
Housing and asset management system	1	Housing	Silver	£1,519,231	NEC SOFTWARE SOLUTIONS UK LTD
Best Start - Lot 2e Group support for families who have children with	1	CYPE	Silver	£90,000	National Autistic Society
PIP - Croydon Drop-in	1	CYPE	Silver	£144,000	Croydon Drop In
Street Homelessness Outreach and Resettlement Service	1	Housing	Silver	£1,814,988	Thames Reach
CCTV fibre connectivity	1	SCRER	Silver	£270,000	BT
Best Start - Lot 2f Peer led Parenting programmes	1	CYPE	Silver	£67,500	South London & Maudsley Nhs Trust
Telephone Parking	1	SCRER	Silver	-	ParkNow/Ringo
Microsoft Enterprise Licensing Agreement	1	ACE	Silver	£1,400,000	Insight Direct (UK) Ltd

Best Start - Lot 2d Parent champion programme	1	CYPE	Silver	£90,000	Home-Start Croydon
Passenger Transport Minibus Contract Lot 2 - St Giles & Rutherfords	1	SCRER	Silver	£4,383,470	HATS Group
Best Start - Lot 2c Peer to peer home visiting support	1	CYPE	Silver	£90,000	Home-Start Croydon
Best Start - Lot 2a Community Capacity Building	1	CYPE	Silver	£67,500	Croydon Voluntary Action
Contactless Parking (Pay and Display Machines)	1	SCRER	Silver	£500,000	Till Payment Solutions (Simple Pay)
Utilities - Water supply	1	Resources	Silver	-	Castle Water Ltd
Audit & Anti-Fraud	1	Resources	Silver	£2,772,000	Mazars
Income Management System (AIMS)	1	Resources	Silver	£1,029,480	Capita Business Services Ltd
People ICT Implementation programme resourcing	1	ACE	Silver	£1,060,480	albany beck
Best Start - Lot 2b Employability Support	1	CYPE	Silver	£56,250	Phase 1 Enterprise Training CIC
Croydon Wheelchair Service	1	ASCH	Silver	£7,500,000	
PMI Partnering Advisor	1	Housing	Silver	£2,680,000	Echelon Consultancy Ltd

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	Bronze	Silver	Gold	Platinum
Contract Governance				
CM Plan (produced and reviewed annually)	x checklist only	✓	✓	✓
CM Schedule and Tracker	✓	✓	✓	✓
End User Handbook (provided by supplier, updated annually)	✓ updated as required	✓	✓	✓
Performance meetings with supplier and client team	x	quarterly	monthly	fortnightly
Contract Change Controls / Variations (Register and Forms)	✓ one for multiple contracts	✓ per contract	✓ per contract	✓ per contract
Dispute / Issue Resolution (complexity of contract will impact resource required to deal with these)	✓	✓	✓	✓
Contract Budget controls (POs set and payments validated; savings identified and recorded ; Budget monitor in place and updated)	x Check invoices match award values	✓ quarterly	✓ monthly	✓ monthly
Benchmarking review	x	✓ once	✓ every 2 years	✓ annually
Contingency and BCP plans and review	x	✓ every 2 years	✓ annually	✓ annually
Supplier financial and business standing review	x by exception	✓ annually	✓ annually	✓ annually
Strategy & Improvement meetings	x	x	✓	✓
Contract Reporting				
Supplier Scorecards: Supplier to complete and return to CM	x	x	✓ quarterly	✓ monthly
CM validation of Scorecard for Council Dashboard Report	x	x	✓ quarterly	✓ monthly
Customer/user surveys / feedback by supplier	✓ end of contract	✓ annually	✓ annually	✓ quarterly

Benefits Realisation update	x checklist only	✓ annually	✓ annually	✓ annually
Risk Register	x	✓ annually	✓ quarterly	✓ quarterly
Budget monitoring report	✓	✓	✓	✓
Contract Resourcing				
Dedicated Contract Manager	x	✓	✓	✓
Assigned contract owner	✓	✓	x	x
Team based CM/CA	✓	✓	x	x
Executive SRO	x	x	✓	✓
CM Training - Formal / External	x	x	x	✓
CM Training - In-house/online	✓	✓	✓	x
Procurement Service Support				
Procurement Strategy support (pre-procurement & exit planning)	x	x	✓	✓
Soft Market Testing	x	x	✓	✓
Contract Transition Checklist (CM Plan, Lessons learnt etc)	x	✓	✓	✓
Classification of Contract (Tiering Tool)	✓	✓	✓	✓
Maintaining the Contract Management Framework	✓	✓	✓	✓
Maintaining Tools and Templates for CM	✓	✓	✓	✓
Facilitate Training Programme for CMs	✓	✓	✓	✓
Overseeing corporate reporting of contracts	x	x	✓	✓
Advising in commercial issues	x	x	✓	✓
Support in commercial disputes	x	x	✓	✓
Engagement with CM on re-procurement	✓	✓	✓	✓
Tendering support	✓	✓	✓	✓

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A
of the Local Government Act 1972.

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