

Environment, Transport and Regeneration March 2020



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Croydon's Green Fund

The Green Fund opened for bids (in October 2019) to provide funding support for projects, activities and initiatives that promote environmental protection, green living and a sustainable lifestyle in Croydon. This opportunity is available on the Green Fund page on the Councils website

https://www.croydon.gov.uk/community/advice/tsfunding/funding/green-croydon-fund

Here is a brief summary of projects funded so far and there are more in the pipeline.

Project	Project details
Socco Cheta Community Garden	To create an inclusive and welcoming natural community asset run by a group of local group and residents. The garden will extend activity, plant trees, encourage food growing, biodiversity, and increase greenery.
Friends of Spa Woods MUGA	To resurface a much used but neglected games area in the Lawns & Spa Woods. The aim is to create a 'Multi Use Games Area' and add some additional features e.g. table tennis table, fence.
Ashburton Park Playground Redevelopment	To renovate and improve playground facilities to promote play activity, fitness and community cohesion. To add new play equipment for children of different ages, needs and backgrounds to come together, play and enjoy with their carers.
Project GROW, Pamper Indulge and Give	To recruit, develop and upskill new community food growers increasing access to healthy food and building on the legacy Croydon's ambitious Food Flagship program and supporting the Croydon's summit work on sustainability.
CAMP2020	Scouting events help young people from across the Borough to learn about outdoor skills, ensuring they thrive & reach their full potential in life within a safe environment.
Green Project	To teach kids and young people how to grow and maintain natural foods from a seed to growth.

Background

The fund will remain open all year around, but applications will be reviewed, and awards will be made three times each year, and confirmed by email. The funding decisions will be made by the Communities Team in consultation with the Cabinet Member for the Environment, Transport and Regeneration.

The sum of £250,000 will be made every year over three years to voluntary organisations delivering either small/medium projects within Croydon that require £1,000 - £15,000, or medium/large projects requiring £15,001 - £50,000.

This fund is also open to applications that extend beyond one year. Multi-year bids will be awarded on an indicative basis, and will be subject to performance.

Green Fund Projects must take place in Croydon, and should deliver an environmental benefit linked to at least one of the following priority areas; environmental protection, green living, sustainable lifestyles.

Projects should also demonstrate, using clear evidence, a link to the priorities outlined in our <u>Croydon Council's Corporate Plan</u> e.g.; reducing social isolation and creating a greater sense of community involvement, creating an environment where our young people thrive and reach their full potential, providing volunteering opportunities, particularly hard to reach groups

Organisations should be non-profit and be at least informally constituted, which means having a bank account in the name of the group with a minimum of two signatories. Funding cannot be used to pay staff.

Blackhorse lane

The two bridges on Blackhorse lane that currently pass over the tram line and the Addiscombe Railway Park cycle lane were built in the 1880s as part of the old Woodside and South Croydon Railway. One is owned by London Trams (TfL) and the other is Croydon Council (LBC). The TfL Bridge failed its principal inspection with a report stating that "Blackhorse Lane Bridge poses a significant risk to the public in its current condition and there is a very high risk that failure of the structure could be sudden and catastrophic".

Due to safety considerations, restrictions on vehicles using Blackhorse Lane bridges were initially implemented. A one-way system was put in place in July 2016, but despite the best efforts to enforce this measure, it was regularly breached by vehicles, leading to the bridges being closed to vehicular traffic in August 2016.

Plans were subsequently worked on to introduce two new widened bridges to current recommended standards with a 120 year life span. The main construction work to

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replace the bridges commenced in January 2019 and on Monday 9th December 2019, the first phase of re-opening Blackhorse Lane Bridge to traffic in one direction (southbound) took place.

At 10am on Tuesday 25 February 2020, Blackhorse Lane will reopen in full to two-way traffic. To facilitate the full reopening, Blackhorse Lane will temporarily be closed to all traffic between its junctions with Morland Road and Teevan Road during the times stated below:

- Monday 24 February 08:00 to midnight
- Tuesday 25 February midnight to 10:00am

This will allow for the safe removal of vehicle control barriers along the road. Local traffic will be temporarily diverted during this period via Morland Road, Woodside Green and Spring Lane. Traffic Marshalls will be present to assist road users.

Pedestrian access will not be affected and all walking routes will remain open at all times.

Emission-based parking charges

The permit scheme is one of a series of measures taken to help improve air quality and address parking access near to residential homes. It was developed in response to various national, regional and local requirements. These include the national Clean Air Strategy 2019, the London Mayor's Transport Strategy, and local community surveys with regards to residents' views on air quality and transport.

The number of cars on the road grew 39% in the last 2 decades and is today still growing 2% each year in Croydon. This is in part due to the way of society and also because the total cost of car ownership, including parking, is becoming relatively more affordable. The permit charges were last reviewed in 2013 and they no longer met their purpose.

The Council has a legal duty to manage traffic and parking conditions, having regard to the national air quality strategy. The emissions scheme is therefore designed to include a mix of permit charges reductions and increases. It should be noted that the charge for the lowest emission cars was reduced from £80 to £6.50.

Air pollution disproportionately affects the sick, young and elderly. Croydon currently has the unenvious record of the highest rate of hospital admissions for childhood (0-9 years) asthma in London (and London has the highest levels in the Country). Each year, 205 deaths in Croydon are attributed to air pollution. At the same time, the number of polluting cars on the roads has just kept on going up. The whole of the borough is already declared an Air Quality Management Area, for failing to meet the legal limit for the annual average level of harmful Nitric Dioxides gasses.

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Localised areas with the highest air pollution disproportionately coincide with the controlled parking permit zones. These zones are also disproportionately in areas with higher levels of health deprivation and they are more densely populated with children and schools.

The emissions scheme is of course not just aimed at residents in permit zones. New emission-based permit charges are about to be rolled out to business and other permit users on 1st April. We are also investing in new smart technology that will enable us introducing emission-based charges in destination parking places, to encourage lower emissions from cars travelling into Croydon from the outside.

Many cars in the permit zones are in fact infrequently used and just take up valuable parking space. Residents tell about increasing difficulties in finding a vacant parking space near to their homes. Driving around the neighbourhood looking for an empty space adds to the congestion and pollution problems. There is a purpose in reviewing parking charges to try discourage such non-essential car ownership and to reduce pollution in the most congested permit zones.

The emissions scheme is of course not specifically aimed at residents. New emission-based permit charges are currently about to be rolled out to business and other permit users on 1st April. We are also investing in new technology that will enable us introducing emission-based charges in destination parking places, to encourage lower emissions from cars travelling into Croydon from the outside. The Council is also working with public transport provides, to improve the alternatives to the car, and we are investing in trees.

The emissions-based parking charges have not yet produced any measurable outcome. The average CO2 emission level for vehicles paying parking charges, including in all the 3 scheme phases, will indicate the trend in emissions reduction. Air pollution and public health are not single-cause static problems. It might be more difficult to correlate a general reduction in the background air pollution and public health directly to the parking charges.

Anecdotally, one resident has commented: "After looking at the costs of the permits I think emission based parking is a good idea. We have 2 cars in our family home, one of them registered before 2001. We will be getting rid of this car as we don't really need it, or drive it much. It is a higher polluting vehicle and it will save us money in the long run if we dispose of it and hopefully help our environment. Yippee. Well done Croydon Council".

School Streets

Building on the innovative pilots, the borough now has active School Streets at 13 schools. There are ongoing consultations at a further 11 schools, with view to implement those with favourable conditions during the second half of 2020. The policy decision is to reach 50 schools in 2022/23, after which we would probably have exhausted the straightforward locations.

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The combination of more cars on our roads and more children coming into school age is creating traffic and parking pressures at the school entrances. At the same time, many journeys that were previously considered easy walkable are increasingly made in the car; ironically often because of the fear of cars. It is for example evident in recent consultation responses that parents living as close as 150 to 300 metres from the school feel it is essential to use the car, because of a perception that it is unsafe to walk.

Although the traffic and parking situation near school entrances is chaotic and hostile at times, there are fortunately not many serious accidents. We do however have very serious public health concerns from poor air quality and inactivity, which are the indirect result of car use. These health impacts are not alleviated until parents stop needless car use. However, parents will not stop using the car until the school entrance feels safe.

A School Street turns the road into a pedestrian and cycling zone at the start and end of school days. This is demonstrated to successfully support the educational behaviour change efforts of Council's Road Safety and School Travel Planners.

A national survey of head teachers at School Street schemes suggest that children who walk or cycle arrive at school more alert, happier and ready to work (UK100, August 2019). In Croydon, head teachers further report improved punctuality and uptake in breakfast clubs. The School Streets thereby supports both child health and learning opportunities.

The School Street also supports local residents. The chair of one residents association has commented six months after the introduction: "It's been such an improvement to the residents, but I notice the parents and pupils seem less manic with a more relaxed feel morning and afternoons. It would be such a shame to go back to the pandemonium we used to have. We have recently paid to have the entire verge cleared and litter picked - much because this scheme has made us feel prouder of the road now it is calmer and we don't have the daily abuse we all used to dread".

Healthy School Neighbourhoods

We are delivering proposals for delivering Healthy School Neighbourhoods (HSNs) around two clusters of schools within the borough.

The first HSN is in Upper Norwood focused around Cypress Upper and Lower primary schools and Harris City Academy Crystal Palace with physical interventions and proposals for introducing low traffic neighbourhoods in the vicinity of these schools including a School Street on Cypress Road. In addition to the School Street proposals, new pedestrian facilities and modal filters are all being proposed. A School Street is due to launch in Cypress Road by the end of the month alongside additional lining works to prevent impacts on congestion and bus services on Auckland Road. Proposals for a raised zebra crossing and additional been designed up by Highways

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and is due to go out to consultation shortly with implementation in the new financial. Additional behaviour change measures such as the Bikelt Plus scheme and STARS are being rolled out at the schools. £190k LIP funding allocated for 2020/21.

The second HSN is in Broad Green around the following four schools: Chestnut Park primary school, Elmwood Infants School, Elmwood Junior School and Ecclesbourne School. An ivy green screen is being funded and installed in Elmwood Infant school as part of the project and we are liaising with Chestnut Park to introduce public realm and greening improvements outside the school that will improve road safety and air pollution. Traffic surveys have been commissioned to inform work on developing proposals to redesign the streets around the schools to reduce motor vehicle dominance and encourage active travel. £160k LIP allocated for 2020/21.

Walking and Cycling

New cycle paths have been installed at Bedford Park and at Fairfield, (the latter, as part of the enablement works to support the opening of the Halls). Cycle schemes have been completed in Lloyd Park, Wandle Park and Park Hill Recreation Ground. Further proposals have been developed for walking and cycling improvements in the Town Centre – for the High Street, Old Town and East Croydon – which will be progressed further this year. Design work is being progressed for routes connecting into the Town Centre including as part of the 'Corridors' programmes. The proposals will improve conditions for walking and enhance the pedestrian experience by enhancing crossings, signage, footpaths etc.

As noted above, £9.56million of TfL 'Livable Neighbourhoods' funding has been secured for the Old Town and Roman Way area, to be used for improvements to walking and cycling infrastructure, public realm, freight consolidation and travel behaviour change.

Street Trees

This is rather a short report since my last Bulletin (January 2020) as we are approaching the end of the planting season, however, there are plans afoot for the forthcoming year and I will be sharing these with you over the next coming months.

Since my last Bulletin, this season's tree planting is more or less complete and we are now looking to plan the next round of street tree planting 2020/2021. A total of 663 street trees have been planted; in addition a further 187 trees planned for planting this season has had to be delayed due to the complexity of introducing tree pits in areas of dominant underground services, therefore delaying planting until November 2020. However, we are pressing on with this side of the Project and currently working in Escourt Road (located off Portland Road), whereby the residents will shortly be involved with the selection of trees; this is the 'start' of introducing trees into streets devoid of canopy and the project has been met with great enthusiasm by the residents.

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As reported in my last Bulletin, the Project was successful in obtaining grant funding of £360k from the Urban Tree Challenge Fund, and surveying in the nominated Wards will commence the next coming months.

After a successful first year, the Capital Street Tree project is set to break its target again by planting 850 street trees, mainly concentrating on Wards located in the north of the Borough.

Since my last Bulletin, the Project has been successful in obtaining grant funding of £360k from the Urban Tree Challenge Fund, "A £10 million scheme to plant more than 130,000 trees across England's towns and cities which forms part of the government's commitment to plant one million urban trees by 2022", to plant 800 street trees in 2020/21. We will be concentrating the tree planting in Wards which have been identified by the Forestry Commission to having a 20% lower tree canopy than other areas of the Borough.

I was delighted to be involved with the National Tree Week (late November) and met up with a local resident, who campaigned for planting flowering Cherries on Cherry Tree Green. This initiative was achieved by funding from the Mayor's Greener City Fund which will also provide trees at several 'sheltered' housing sites located in the north of the Borough;

I am very proud of this particular project as in my opinion we are bringing trees to people who in most cases do not have the ability to visit their local green space or in fact walk down a tree lined street.

Now it is 2020, the Country will be gearing up for the Tokyo 2020 Olympics and as part of this exciting event, we have been awarded 80 Sakura Cherry trees from the Japanese Society last year; we have been waiting patiently for the trees to finish their quarantine period and looking forward to seeing them being planted this coming November. The Trees & Woodlands team are currently working in partnership with the Friends of Addiscombe Recreation Ground (30 trees) and Sanderstead Recreation Ground (50 trees) to deliver this exciting community project.

London Plan

The Croydon Local Plan Review is well underway and the first stage of consultation on the Issues and Options Document concluded in early January. I would like to thank all those that took time to engage in the consultation and comment on the Issues and Options Document. These comments will inform the production of the next stage of the Local Plan Review to be published in the Autumn. A key issue outlined in the Issues and Options Document is the housing need and target for London and the borough. The borough's housing target is set out in the London Plan. The adoption of the new London Plan is currently subject to the Secretary of State's response to the Mayor's Intend to Publish version of the new London Plan, following receipt of the Planning Inspectors' Panel Report, which is recommending a reduced housing target for London and Croydon from the version of the London Plan submitted for Examination. The next Local Plan Review draft will have regard to Croydon's housing target adopted in the New London Plan.

Development Management Finances

The Council prides itself in effective and efficient management of the town planning budgets – with resources being utilised to deliver on increased service demands, including the number and complexity of planning application submissions

Our income target for 2019-20 was £3,566,000 (made up of planning application, pre application and PPA income). At the end of January 2020 we had secured £3,411,343 of that income with a system projection of £4,103,000 by the end of March 2020.

The increased income has been accompanied by additional workloads which has meant that we have been required to find additional resources such as staffing. Our fee target for next year will be around £3.8 million

Planning Decisions Throughput

Since my last Bulletin, between 25th November 2019 and 14th February 2020 we issued 833 planning decisions, which gives a clear indication as to the level of development activity taking place across the borough (both large and small scale projects).

In accordance with the National Planning Policy Framework, we pride ourselves in trying to resolve issues as part of the planning application determination process, with an emphasis on pre application discussions, rather than just refusing planning permission. During the above period, just over 15% of submissions were refused/not

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accepted by the Council. We also had a relatively high success rate on appeal (1st December 2019 to 31st January 2020) with a 74% of appeals dismissed.

New homes bonus

In 2020-21 Croydon Council will receive £2.7m in New Homes Bonus grant for the housing deliver in 2019-20 - this is the second highest allocation to the Council since the mechanism began. Along with payments for previous years, Croydon will receive a total of £7.3m in New Homes bonus next year, which will be used to support service delivery for all communities across the borough.

Regeneration projects delivered over the last year and proposed 2020/21

Thornton Heath

We are currently completing a £2.7m programme of NHB funding investment in public realm, shop front improvements and public art in Thornton Heath. The scheme provided 11,615 sq.m new / improved public realm in key locations: Parchmore Road Junction, Thornton Heath Library and Whitehorse Roundabout; and building front improvements including 24 improved shopfronts, repainted uppers/parades and four large-scale pieces of wall art in collaboration with the local community. Through the scheme, a new event space is being created at the forecourt of Ambassador House – a key gateway into the high street from the station. Works will complete shortly ready for a programme of events across the summer. A number of events have already taken place on the space giving residents a chance to try out a number of fun ways to get more active.

Kenley & Old Coulsdon

With support from the Mayor of London's Good Growth Fund, the Council has carried out extensive engagement with all those who work, live or spend time in the neighbourhood. Between May and September 2019 a number of engagement events and activities were held to help shape the vision for the future of the neighbourhood. Based on the outcomes of this engagement, a Community Plan has been created to guide the way that Kenley evolves and prioritise what the community needs. More information and a community survey is available here:

https://getinvolved.croydon.gov.uk/project/554 A second stage bid for £900k to the Mayor's Good Growth fund was submitted in February, based on the priorities identified through the Community Plan process.

New Addington

The council's stunning new leisure and community centre in New Addington opened to the public on Friday 3 January. The multi-million-pound development is the latest step in a major regeneration project which will radically transform the western side of Central Parade; the first phases of which has already seen about£5m investment in the last five years.

The modern leisure centre, with extended sports and leisure facilities, includes a 25-metre, six-lane main swimming pool and a learning pool, an extensive fitness suite, sport halls and multi-purpose activity studios – hosting all the latest branded classes. The on-site cafe will provide much needed post workout refreshments. Next month, design work will begin on the next phase of regeneration (including a new wellbeing centre, retail and workspace and new homes) to create a new high street frontage to the western side of Central Parade.

Norbury

A new community planter has been created at St Helen's Triangle through the work of local volunteers.

Norbury Hall Park toilets are being refurbished and reopened.

A new Regeneration Steering Group has been established and they have led on the development of agree a list of priorities for investment and intervention in the neighbourhood.

Selsdon

In Selsdon, local ward members, supported by the council, are leading on the development of a Community Plan which will identify priorities for future investment and intervention.

South Norwood & Woodside

Building on their 2017 Community Economic Development Plan, We Love SE25 worked with Council Officers and the GLA to develop the We Love SE25 Community Plan in November 2018: http://www.welovese25.org/plan/. The success of the Plan led to the Council securing a further £2.3m from the Mayor of London's Good Growth Fund for a variety of interventions across South Norwood, including a specific focus on improvements to several local community buildings and empty commercial properties along the area's two main high streets, along with a programme of business support and place-making. The Council is now working with We Love SE25 and other key community groups across the neighbourhood to plan and implement each of the interventions.

Projects currently underway:

- Socco Cheta: investment in the building is currently being planned to provide a more fit-for-purpose community hub and a new consortium group has been established to manage the space once work is complete.
- Portland Bridge lighting: following consultation with the local community, a new lighting installation has been designed which will lighten up the underpass and provide a safer and more welcoming gateway into the town.
- A new business support programme is being established to support small and local businesses to continue to thrive in SN high street.
- A place-making programme will shortly be commissioned to make improvements to the public realm and environment around the High Street and Portland Road.
- Further work is underway to bring empty shop units back into use and encourage meanwhile and place-making opportunities.

Successful funding bids made by regeneration

- The Council is through to the second stage of a Good Growth fund bid for Kenley which would provide a further £900k of funding from the Mayor of London to support a number of investments and interventions to improve community and social infrastructure in the area and support a number of public realm improvements and public transport and walking and cycling connectivity. A funding decision is expected in March.
- The Council is also through to the final stage of a High Street Heritage Action Zone project for South Norwood. If successful, the programme will provide £1.1m of investment from Historic England to improve the high street frontage in South Norwood and deliver a 4 year programme of business and community engagement and cultural programming.
- Thornton Heath has recently been awarded one of the Government's new High Street Task Force pilot projects. This will see the area receiving 12 months of advice and guidance from a team of experts to review the opportunities to strengthen the high street and safeguard it's future.
- Purley Way Masterplan: This year the Council's Spatial Planning Service successfully bid to the Mayor's Homes Building Capacity Fund to secure £311,000 to develop a concept masterplan, detailed masterplan, dedicated Local Plan Review chapter and delivery strategy for the Purley Way. The work is looking to transform the environment of the Purley and facilitate a step change in residential and mixed use development, whilst not prejudicing the Strategic Industrial Locations and their intensification. The dedicated Local Plan Chapter and concept masterplan will be published as part of the Local Plan Review in the Autumn of this year.

Growth Zone Corridors

We are planning for improvements to 3 key routes which provide access from the wider borough to the town centre – London Road, Mitcham Road and Brighton Road. These will focus on encouraging walking, cycling and bus travel along and around these streets, and improvements to public spaces, with the intended associated benefits of improving air quality and increasing personal and road safety. In the next year, we will be speaking to local residents, businesses and community groups to inform proposals for two public spaces along the London Road at Norbury and Broad Green, alongside progressing design and modelling work for the wider improvements on all 3 streets.

Growth Zone expenditure

Delivering the Growth Zone is a key priority of the administration to enable and support investment in jobs, housing, economic growth and the regeneration of the Town Centre. The benefits of the Growth Zone will be realised across the whole borough.

The total Growth Zone programme capital expenditure over the next 3 years is £78million. The distribution of this funding across the Growth Zone themes are as follows:

Growth Zone	Committed
Workstream	funding 19/20-
	22/23 (£000's)
Transport	35,434
Public Realm	23,526
Construction	1,474
Logistics	
Parking	1,125
Culture	3,500
Smart Cities	2,721
Social	8,400
Infrastructure	
Employment and	800
Skills	
Energy	1,020
Total	78,000

Major Projects

Leon Quarter

Having made a resolution to grant we currently await the Mayor's Stage 2 response on this scheme for the redevelopment of the site to provide a mixed use development within three buildings up to 31 storeys, providing up to 359 residential units and flexible units for retail, new public square and landscaping. 30% affordable housing will be secured in the scheme.



Edridge Road

We have been working with the applicant to amend the scheme and are working towards presentation to Planning Committee soon. The scheme is for the erection of a part 33 storey, part 11 storey and part single storey building providing approx. 240 residential units, communal roof terraces and amenity spaces. Up to 46 units are to be secured as affordable housing.



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College Tower

Officers are currently finalising the agenda for the 27th February Planning



Committee, with the scheme being recommended for approval for redevelopment to provide a part 49 storey and part 34 storey building with basements, comprising 817 coliving units within Tower A and 120 residential units within Tower B, a cafe and community use. The scheme would deliver over 30% affordable housing by habitable room.



Fairfield Homes

Officers are reviewing the scheme for erection of five buildings ranging in height from 7 to 29 storeys to provide 421 residential flats (Use Class C3), flexible commercial space at ground floor of Building A (Use Class A1/A2/A3) and Buildings C and E (A1/A2/A3 and/or B1/D1 or D2) and working with the applicant, targeting a Planning Committee soon.

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Timebridge School

An application is being reviewed by officers for erection of new two storey SEN school, new access, car parking, play areas, landscaping and associated works.



CIL and section 106 receipts and allocation

The Council continue to collect income from Section 106 Agreements and Community Infrastructure Levy (CIL) to mitigate the impact of developments consented through the planning process. With regard to the borough's CIL from 1st April 2013 to 31st March 2019 a total of £27,283,607 was collected. To date, £11,514,051 of Borough CIL has been assigned to projects on the Council's CIL Infrastructure List, on the Council's Capital Programme and in the Infrastructure Delivery Plan to mitigate the impact of *development*.

Subject to the necessary approvals and by the conclusion of the 2019/20 financial year, a further £7,200,000 of the borough's CIL will be assigned to projects on the Council's CIL Infrastructure List, on the Council's Capital Programme and in the Infrastructure Delivery Plan to mitigate the impact of development. The borough's CIL Local Meaningful Proportion continues to fund Ward Budgets.

In terms of Section 106, between 2016-2019 the borough collected £4,673,306 of Section 106 income. During the same period the Council's Infrastructure Finance Group has assigned £5,600,384 to projects that accord with the parent Section 106 and form part of the Council's Infrastructure Delivery Plan as project to mitigate the impact of development. At the end of Quarter 3 2019/20 the Section 106 balance sheet was £10,064,168.

Further detail regarding the collection and assignment of CIL in include in the CIL Annual Monitoring Reports and Section 106 expenditure is published on the Council's website quarterly.

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Building Control

Building Control income is currently looking to achieve c.£950k, because of the profile of the trading year in construction, the winter months are the leanest with an upturn normally occurring towards the end of the financial year. This year has been particular lean with a notable decline in profitable projects attributable to the Brexit effect. The Building Control Trading Account runs over a 3-5 year cycle to offset the peaks and troughs and to allow for projects which may take several years to complete and to this end surpluses and deficits are carried over or met from the reserve fund.

The idea of Croydon Building Control operating as a Local Authority Trading Company, to address long-term sector wide issues of recruitment and resilience is still being worked on tentatively while we wait for future direction from the MCHLG following the Hackkit Report and the setting up of a Building Safety Regulator (BSR) under the HSE. This BSR arrangement is expected to operate at a local level with LABC and Fire Authorities but the information released to date suggest that Building Control could return to much more of an enforcing body under the HSE than the currently competitive environment with Approved Inspectors.