REPORT TO:	CABINET 22 nd March 2021
SUBJECT:	Delivering the Croydon Growth Zone
LEAD OFFICER:	Stephen Tate, Director of Growth, Economy and Regeneration
CABINET MEMBER:	Councillor Stuart King Cabinet Member for Croydon Renewal
	Councillor Manju Shahul-Hameed, Cabinet Member for Economy & Jobs
	Councillor Oliver Lewis, Cabinet Member for Culture and Regeneration
WARDS:	AII

CORPORATE PRIORITY/POLICY CONTEXT

Delivering the Growth Zone is a key priority of the administration to enable and support investment in jobs, housing, inclusive economic growth and the regeneration and recovery of the Town Centre.

The approach to the Growth Zone programme as set out in this report aligns with the priority commitments in the Croydon Renewal Improvement Plan to:

- live within our means, balance the books and provide value for money for our residents; and
- ensure our systems, processes and controls are fit for purpose

This report reflects the recommendation made in the October 2020 Grant Thornton Report in the Public Interest (RIPI) that:

'the s151 officer should revisit the Growth Zone assumptions following the pandemic and make recommendations to Cabinet and Council for the continued investment in the scheme'.

This report also responds to the 'key next steps' set out by PWC in their November 2020 review of the council's capital investment programmes:

'Given the current economic uncertainty, the steps the Council have taken to review and revise down the ambitious investment plan for Growth Zone are sensible. There will be a continuing need for some investment in Croydon, particularly in light of the need to generate growth after the pandemic, and so switching off all planned investment would be unwise. Any subsequent increase in planned investment should be supported by a business case and taken through robust governance and sign off processes for full scrutiny.'

FINANCIAL IMPACT

The Growth Zone business rate uplift retention funding mechanism was approved by Cabinet in July 2016 and the Mayor of London in September 2016, and ring-fences growth in business rates from April 2018 for 16 years, plus an option to extend by 3

years, in the designated area. A Statutory Instrument was laid in parliament which led to the formal approval of the Growth Zone by the Government from April 2018.

The original Growth Zone programme included an estimated £520 million of projects supported by a loan of £309.9 million with the balance (circa £210 million) met from other sources including TfL, the GLA or S106 planning obligations.

In October 2018 Cabinet approved a programme of activities and associated funding draw down for the first phase of the Growth Zone programme up to 2023 (see key decision reference 1418CAB). Cabinet further approved £1.721 million to support a related Smart Cities and Digital Transformation programme on 8th July 2019. A further report was issued to Cabinet 22nd Febuary 2020 requesting the original budget of £167m be re-profiled to £78m (see key decision reference).

This report is proposing a further re-profile of the capital expenditure for the programme, reducing the programme-wide expenditure to £4m in 2021/22.

FORWARD PLAN KEY DECISION REFERENCE NO.: 1321CAB

The notice of the decision will specify that the decision may not be implemented until after 13.00 hours on the 6th working day following the day on which the decision was taken unless referred to the Scrutiny and Overview Committee.

The Leader of the Council has delegated to the Cabinet the power to make the decisions set out in the recommendations below

1. RECOMMENDATIONS

The Cabinet is recommended to

- 1.1 Approve the amended funding profile for Growth Zone projects as detailed in section 6 of this report; and
- 1.2 Subject to the requirement to comply with the provisions of Part 4G of the Constitution in taking delegated decisions, and the parameters previously approved in the February 2020 Cabinet report 'Delivering the Growth Zone' delegate to the Executive Director of Place in consultation with the Chief Finance Officer (Section 151), the Cabinet Member for Finance and Resources, the Cabinet Member for Croydon Renewal, Cabinet member for Economy and Jobs and the Cabinet member for Culture and Regeneration authority to make necessary changes to the funding and phasing of the approved Growth Zone projects list. Any such changes will be reported to Cabinet.

2. EXECUTIVE SUMMARY

2.1 This report sets out proposals for a re-profiled Growth Zone programme. This factors in the Councils current financial position and resourcing implications, and responds to recent recommendations of the RIPI and the PWC capital

investment review. It reflects the need to consider the approach to recovery and renewal of Croydon town centre following the devastating socio-economic impact of the coronavirus pandemic. Finally, the proposed reduced 2021/22 Growth Zone programme allows the Council to review, model and plan for different scenarios regarding major developments in central Croydon, notably the redevelopment of the Whitgift Centre, ensuring that the proposed uses for these key sites are appropriate and sustainable.

2.2 This report sets out high level details of a proposed reduced Growth Zone capital programme of £4m for financial year 2021/22. A further report will be submitted to Cabinet later this year identifying the capital expenditure proposed for financial years 2022/23 and 2023/24 and setting out the associated projects and activity. An exception report will be brought to Cabinet following the strategic review of the Growth Zone programme, clarifying updated priorities and projects, and timescales for delivery.

3. INTRODUCTION

- 3.1 The Growth Zone programme was originally established to leverage opportunities to create the appropriate social, economic, cultural and physical infrastructure needed to ensure that the significant development and growth anticipated within Croydon town centre was sustainable. As a 16 year programme, starting in 2018, it was always envisaged the the strategic direction of the Growth Zone would flex and change over time, with a governance structure established to ensure that the priorities of the programme reflect the needs of the town centre as development and regeneration takes shape. Our key priority is to deliver the benefits of growth and regeneration to local people and ensure that no community is left behind. We will support existing communities, alongside planning for and providing the infrastructure and services required by the new residents who will settle in the town centre, moving into new homes developed as part of the regeneration programme. We want to develop the talents and aspirations of our residents, businesses and communities, making Croydon an exciting place to live, visit, invest and spend time in. Further information detailing the background to the Growth Zone can be found at Appendix 1.
- 3.2 Whilst many of the major development projects planned for the town centre were starting to progress in the early years of the Growth Zone programme, there have been delays to some key town centre developments, including the proposed redevelopment of the Whitgift Centre. This, compounded by the devastating economic impact of the coronavirus pandemic on town centre businesses, Growth Zone stakeholders and funding partners, alongside the significant shift in consumer behaviours, work and travel patterns, has meant that the Council has to re-appraise the objectives of the Growth Zone programme. We will create a roadmap for the safe reopening of Croydon town centre with business support and community and cultural activity, as well as looking towards longer term plans for inclusive, sustainable growth and renewal.

- 3.3 In the spring of 2020 the Growth Zone team undertook a review of all the programme's activities and projects, and many were paused, with the approval of the Growth Zone Working Group. The independent strategic review undertaken by PWC reported in November 2020 that 'given the ongoing COVID-19 pandemic and economic uncertainty, reducing planned funding in FY20/21 to £6.7m was a sensible step as the original business plan is no longer fit for purpose and requires revision.' The majority of major transport infrastructure and public realm projects are on hold, although some walking and cycling infrastructure projects have progressed. Work on construction logistics continued. Some activities relating to culture, social infrastructure, energy and smart cities have continued, where possible via remote working.
- 3.4 The council need to re-consider our aspirations for the town centre. The Growth Zone programme always envisaged an evolving and growing town centre neighbourhood, but the current circumstances require us to pause, reflect and re-focus the programme. Working with our key stakeholders and partners we will reassess how best to target expenditure to where it will create the most impact and taking the time to plan for longer term investment to engender the town centre's sustainable socio-economic recovery. The PWC report states: 'reappraisal may enable LBC to pause further investment. However, we would not recommend closing down the GZ programme as this provides LBC with a vehicle to focus any recovery investment required of it and (dependent on central government policy) does provide LBC with the ability to use Business rates that it may otherwise have to return to central government.'
- 3.5 Starting last summer, the Growth Zone team, working with colleagues across the Council and key strategic partners, have started to consider the programmes revised objectives and approach. Given the council's constrained finances, we will consider how to best place the Growth Zone programme to target emerging national and regional funding streams, and how to seed Growth Zone investment to realise larger funding commitments from public and private sector partners. With Croydon's existing communities we want to build a place where innovation and enterprise can flourish, which attracts people to its culture and creativity, nurtures local talent and supports individuals and communities to fulfil their potential. Croydon will continue to be exceptionally well connected, with new and improved infrastructure that enables people to easily come together, and travel to, from and around the borough, with fantastic digital, communications and transport networks.

4. Policy Context

- 4.1 The approach to the review of the Growth Zone's programme for 2021/22 aligns with the priorities set out in the Council's <u>Economic Strategy 2019-2024</u>:
 - To create places where businesses, investors and residents want to live, trade and invest
 - To create a business environment for growth
 - To invest in ideas that can deliver real change for Croydon
 - To invest in our people

- 4.2 This approach accords with the Mayor of London's Good Growth principles, as set out in the new London Plan. These principles support growth on the basis of its potential to improve the health and quality of life of all Londoners, to reduce inequalities and to make the city a better place to live, work and visit. It uses the opportunities of a rapidly-growing city to plan for a better future, using each planning decision to improve London, transforming the city over time. It plans not just for growth, but for Good Growth sustainable growth that works for everyone, using London's strengths to overcome its weaknesses. The key principles of Good Growth are:
 - Building strong and inclusive communities
 - Making the best use of land
 - Creating a healthy city
 - Delivering the homes Londoners need
 - Growing a good economy
 - Increasing efficiency and resilience
- 4.3 Alongside the Good Growth principles, the council's review of the Growth Zone will consider how best to align with the GLA's nine 'missions' which form the London Recovery Programme, in particular:
 - High Streets for All
 - Good Work for All
 - A Green New Deal
 - A New Deal for Young People, and
 - Building Strong Communities
- 4.4 The South London Partnership have commissioned Oxford Economics to undertake an economic review of the impacts of the pandemic on the subregion, and then build on this intelligence to prepare an economic recovery action plan. We are working closely with the partner boroughs forming the South London Partnership to ensure our emerging plans for central Croydon's renewal are considered within the context of the sub-regional approach to post-covid economic recovery.
- 4.5 The Growth Zone team will work closely with Economic Development colleagues to ensure that the emerging plans for supporting the borough's post-covid economic recovery (and associated distribution of government grant funding) are reflected in the approach to the Growth Zone programme review
- 5. Growth Zone programme 2021-22 Strategic Review and Next Steps
- 5.1 The council will continue with a comprehensive review of the entire Growth Zone programme, including a reassessment of original business cases/vision and identification of updated programme priorities. The proposed Growth Zone funding for the next financial year will need to be adjusted to reflect the current economic and financial challenges. This review will incorporate sensitivity testing of the programme's financial appraisals, and analysis of any risks to the

continued progression of key development sites and associated local investment.

- 5.2 A significant proportion of the major development sites in the COA are progressing. The Council is in dialogue with the Croydon Partnership (Westfield) regarding the strength of their commitment to and timing of the Whitgift redevelopment plans, and the need to reconsider what appropriate and sustainable mix of uses could be viable for this site. At least in the short to medium term this means that the Growth Zone is likely to work with the Centre's owners to plan for longer term 'meanwhile' activity within the Whitgift site, including the potential to re-purpose and adapt some of the existing built structures for new uses.
- 5.3 We have started to work with Growth Zone partners and stakeholders to reforecast the programme of development activity, business investment, population growth and demographic change in town centre. A high level strategic review of the Growth Zone programme has commenced alongside a visioning exercise for the renewal of the town centre. We have an opportunity to harness the disruption of the covid-era to radically rethink how we best use the Growth Zone to catalyse sustainable growth in the town centre. The existing Growth Zone governance structure remains, with themed subgroups feeding into the overall review. This will define a priority delivery programme that will be evidence-based, which will be reported back to Cabinet once further modelled and tested.
- 5.4 The Growth Zone team will work with local stakeholders and partners to plan and undertake urgent interventions to the town centre in the coming months to ameliorate the recent blight following retail and office closures. This will improve and enliven the high street for returning workers, shoppers and visitors.
- 5.5 TfL have been hard hit by the coronavirus pandemic, and they are currently seeking funding from the Department of Transport in order to continue with some of the key transport infrastructure projects planned under the Growth Zone. We will work with TfL to re-profile their commitments and the priority order and timeline for investment in transport projects.
- 5.6 The council will continue to support London South Bank University in their investment in their new Croydon town centre campus, due to launch in September 2021, and we will work with them to navigate the easing of coronavirus restrictions.

6. Growth Zone – re profiled budget 2021-22

6.1 High level detail of the re-profiled Growth Zone programme for the next financial year is set out in section 7 of this report. A revised figure of £4m to be ring-fenced to the Growth Zone programme for financial year 2021/22 is sought to enable continuation of key priority projects and activities, as defined and confirmed following the strategic review, in this coming year.

- 6.2 A further report will be brought back to Cabinet later this year setting out future years' capital expenditure requests for the Growth Zone programme.
- 6.3 The table below summarises the previous approved expenditure (column A) broken down by themes, (February 2020 Cabinet approval to financial years 2022/23), and the revised budget (column B) requested for financial year 2021/22 only, to enable a full programme review and a priority list of future projects to be developed.

Workstream	(A) GZ funding approved 19/20- 22/23 (£000's)	(B) Revised funding requested 21/22 (£000's)	
Transport	35,434	500	
Public Realm	23,526	1,511	
Construction Logistics	1,474	300	
Parking	1,125	200	
Culture	3,500	367	
Smart Cities	2,721	200	
Social Infrastructure	8,400	300	
Employment and Skills	800	0	
Energy	1,020	0	
Staffing costs	% of in year budget	622	
Total	78,000	4,000	

7. Re-profiled programme by workstream

7.1 Culture:

7.1.1 The programme of cultural events and activities in the town centre will expand in the run up to Croydon's launch as London Borough of Culture in 2023, with key support to be established to help creative and cultural businesses and organisations to respond to changing requirements following the lifting of lockdown restrictions. Further work to develop this programme is in progress and will be reported back to Cabinet in a future paper.

7.2 Social Infrastructure:

7.2.1 Key elements of the social infrastructure programme will come forward in the Cabinet paper later this year, including investment in community facilities and children's play provision and starting the long term refurbishment and upgrade of the Clocktower and Town Hall civic complex.

7.3 Transport:

- 7.3.1 Growth for Tram2 is a live TfL-led project with a Growth Zone programme contribution. Its focus is on increasing capacity of existing system (projects include platform extension, dual tracking to Elmers End and at Wandle Park flyover, additional depot capacity). It is possible that TfL decides to review whether this remains a priority post pandemic, however LBC needs to remain fully engaged in the meantime.
- 7.3.2 Bus priority schemes led by TfL will continue subjected to Department for Transport financial support
- 7.3.3 Walking and Cycling schemes will continue through a variety of secured external funding streams (LIP, Business Low Emission Neighbourhood, Liveable Neighbourhood & DfT active travel funding)
- 7.3.4 The parking review of increased demand in the Growth Zone was linked to the Westfield major development proceeding as programmed, this is now paused until clear direction is available with this development
- 7.3.5 Brighton Mainline (including East Croydon station) is a live TfL led project. It is possible that TfL decides to review whether this remains a priority post pandemic, however LBC needs to remain fully engaged in the meantime.

7.4 Construction Logistics:

7.4.1 Careful monitoring and traffic management planning will need to continue to ensure that Croydon's road network does not become congested with continued development works in the town centre advancing. Proposals for an Urban Freight Management Plan & Construction Consolidation Centre will need to be developed further.

7.5 Smart Cities:

7.5.1 Digital advertising to continue with Vala contract in place progressing with legal and planning. JCDecaux contract ending 31/03/2021, new contract provider progressing with the design and installation programme. 4G small cells deployment to continue. Digital Town Hub project to continue which will identify wider benefits to the Council, 3 pilots will be established for Purley, South Norwood and Thornton Heath

7.6 Place and Public Realm:

- 7.6.1 Minster Green Project to be broken down into smaller packages so that if opportunities arise before the end of the 2021/22 financial year /funding becomes available through other sources (e.g. TfL's Liveable Neighbourhood fund) some elements can be delivered early.
- 7.6.2. The Fair Field: further internal engagement required to decide on the best way forward either delivering the existing plans submitted for planning summer 2020, or a value engineered scheme. Coordination with other neighbouring

developments will continue in order to understand whether delays in delivering any of the neighbouring schemes could result in a change of scope to the Growth Zone-led project. Interim proposals for the Fairfield public realm will focus on meanwhile opportunities that can add tangible benefit to the Fairfield Halls cultural and community functions.

8. CONSULTATION

8.1 Consultation has taken place with key stakeholders and partners as established through the Growth Zone governance structures.

9. PRE-DECISION SCRUTINY

9.1 The timeline for preparing this report has not allowed for review by Scrutiny Committee ahead of the Cabinet decision, but we would welcome Scrutiny of the revised Growth Zone proposals for 2021/22 in the near future if desired.

10. FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

10.1 Revenue and Capital consequences of report recommendations

	Current year	Medium Term Financial Strategy – 3 year forecast		
	2020/21	2021/22	2022/23	2023/24
	£'000	£'000	£'000	£'000
Capital Budget available	14,430	36,000	33,000	0
Re-profiling of budget	-10,930	-32,000	33,000	0
Revised Budget	3,500	4,000	0	0
Effect of decision from report				
Expenditure	3,500	4,000	0	0
Remaining budget	0	0	0	0

10.2 The effect of the decision:

The recommendation in this report is to re-profile the approved budget of £36 million for financial year 21/22 to a new profile of £4 million. This is so that the capital budget remains in line with anticipated expenditure and facilitates an appropriate review of the programme given the current challenges.

10.3 **Risks**:

The Growth Zone is subject to a governance process where the risks are reviewed on a regular basis. The key risks of the Growth Zone are set out below:

- The Growth Zone financial model is based on anticipated future business rates income, which would enable the Council to repay its borrowings. Any significant changes to future income streams will impact on the viability of the Growth Zone. Sensitivity analysis has been undertaken to provide confidence that the modelling can respond to unforeseen circumstances to include changes to interest rates, increases in costs and reduction in income from business rates uplift. Financial modelling will continue throughout the life of the Growth Zone. The borrowing levels depend on the satisfactory progress of developments occurring in the Town Centre which will bring about the uplift in business rates used to repay the debt. If these developments slip, the amount to be borrowed in future years could be affected and if so this variation will be reported to Cabinet
- Any overspends in early programmes will impact on the funding available for later projects and programmes. Expenditure and delivery of projects will be managed by the Growth Zone Steering Group and Working Group. Any unavoidable overspend will mean a reduction in funding available for projects planned for the future.
- Project and programme delays could impact on the success of the Growth Zone. Governance arrangements are in place with partners and stakeholders to ensure clear understanding of roles and responsibilities. Regular meetings of the Growth Zone Steering Group and Working Group is a practical method of monitoring project management and the early identification of any delivery issues for attention.

10.4 Options

The only option proposed is to amend the profiled budget to better align to the current circumstances and timescales of development sites and to assess the current economic challenges and align the programme accordingally to reflect these new demands.

10.5 Future savings/efficiencies

As further work is undertaken in the Growth Zone, a specific aspect will be the consideration of procurement routes and the packaging up of individual projects to identify and achieve cost efficiencies. The Growth Zone Steering Group brings all partners together to ensure the sharing of information and this will be the forum to facilitate much of these activities.

Approved by: Chris Buss, Chief Finance Officer (S151)

11. LEGAL CONSIDERATIONS

11.1 The Head of Commercial and Property Law comments on behalf of the Interim Director of Law and Governance that Government approved the Non-Domestic Rating (Designated Areas) Regulations in February 2018. These Regulations establish and enable what is known as a 'Local Growth Zone' by providing for

the local retention of non-domestic rates collected in designated areas in England, Croydon being one of those areas. Through the Regulations the Growth Zone in Croydon is established for 16 years from February 2018.

11.2 The recommendations in this report are in accordance with the Council's Constitution and in implementing the recommendations the officer decision maker will need to adhere to the Decision Making Protocol within Part 4G of the Constitution, the provisions of Part 4B of the Constitution in relation to Access to Information including the publication, where required, of key decision notices and will need to adhere to the provisions of the Budget and Policy Framework Procedure Rules at 4C.

Approved by: Sean Murphy Head of Commercial and Property Law on behalf of the Interim Director of Law and Governance and Deputy Monitoring Officer.

12. HUMAN RESOURCES IMPACT

12.1 There are no direct staffing implications for LBC as a result of these recommendations.

Approved by: Sue Moorman, Director of Human Resources

13 EQUALITIES IMPACT

- 13.1 A key priority for the Council is to work with our partners to make Croydon a stronger fairer place for all our communities. Croydon's Opportunity and Fairness Plan 2016-20 outlines actions to tackle inequalities such as educational attainment, health, homelessness, unemployment, crime and social isolation, particularly in the borough's 6 most deprived wards. Successful delivery of the Growth Zone interventions and projects outlined in this report will create more opportunities for Croydon residents and contribute towards greater equality, fairness and better outcomes for all.
- 13.2 An Equalities Analysis was completed in September 2020 (see Appendix 1) for the Growth Zone programme as a whole. This found that the programme will have a positive impact for all protected groups that share protected characteristics. These include improved accessibility within the street environment and access to public transport, a cultural offer that supports routes to employment and training opportunities; and safe and reliable public transport and walking and cycling routes.
- 13.3 Further Equalities Analyses are being undertaken for each individual Growth Zone project as these progress through the design stages. The Growth Zone programme governance sets out that individual workstream sub-groups will ensure this occurs and where necessary action will be taken to mitigate any negative impacts on groups that share a protected characteristic. In addition, in exercising any delegated decision making, the officer in question will ensure that equality and inclusion issues are appropriately explored and considered by the decision maker prior to such decisions being taken.

14. ENVIRONMENTAL IMPACT

14.1 Projects included in the Growth Zone are being delivered in line with current environmental requirements and the Local Plan policy which promotes, as part of sustainable development, the consideration of environmental impacts. For example, the Growth Zone transport, corridors and public realm projects include specific objectives focussed on improving air quality, increasing urban greening, tree planting and shading and provision of sustainable drainage. We are enhancing facilities for healthy and sustainable transport, targeting the shift from car use to walking, cycling and public transport in line with the Mayor's Transport Strategy targets and Healthy Streets indicators. The Energy, Smart City, Parking and Smart City workstreams are all focused on making best use of available data and technology to reduce the environmental impact of the town centre regeneration, and future population and visitor growth. In response to the Council's Declaration of a Climate and Ecological Emergency, we are reviewing where relevant projects could contribute more to tackling climate change.

15. CRIME AND DISORDER REDUCTION IMPACT

15.1 The Borough Commander is aware of the Growth Zone and has requested regular progress reports to enable future planning for policing. The design of public realm schemes will involve liaison and consultation with the Metropolitan Police Service to reduce the risk to personal safety.

16. REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- The decision to progress with the Growth Zone was taken by Cabinet in July 16.1 2016 and the Mayor of London in September 2016. Subsequently, Cabinet in December 2017 agreed the Growth Zone work programme for 2018/19, and an updated programme to 2023 was agreed by Cabinet in February 2020. Government approved the Regulations for the Growth Zone funding mechanism and area in February 2018. Since the inception of the Growth Zone and the initial Development Infrastructure Funding Study (January 2014), it has been understood that the infrastructure required to mitigate the growth planned will not be delivered by existing delivery methods, current funding availability or through planning gain. Therefore, the Growth Zone is essential to enable the delivery of critical and essential infrastructure to mitigate the impact of the growth planned (Croydon Local Plan 2018, Croydon Opportunity Area Planning Framework 2013 and London Plan) for the benefit of existing and future residents, businesses and visitors. The Growth Zone is an innovative approach to fund and deliver this critical and essential infrastructure.
- 16.2 The recommendation to approve a substantially reduced Growth Zone funding profile for the coming financial year reflects the need to undertake a review of

the Growth Zone's assumptions and programme requirements in the light of the impact on the town centre of the coronavirus pandemic; changes to the pipeline of major developments; and the implications of the Council's current financial status. By retaining a slimlined £4m programme we can continue to progress key projects and secure external match-funding, during this period of review.

17. OPTIONS CONSIDERED AND REJECTED

- 17.1 As part of the justification for the Growth Zone outlined in the July 2016 Cabinet report the option of not forward funding infrastructure, but to depend upon the market and the provision of infrastructure only through public sector capital funding, CIL and s106 was considered, but deemed unable to deliver the critical and essential infrastructure to mitigate planned growth. This remains the case today, the absence of the Growth Zone is very likely to lead to the accommodation of growth, especially in the Croydon Opportunity Area, without the critical and essential infrastructure identified in the approved Delivery Plan.
- 17.2 A zero budget for financial year 2021/22 was considered and deemed unjustified, this would risk the continunity of the programme and previous years activities.
- 17.3 As noted above, the recent PWC review confirmed that switching off all planned Growth Zone investment would be unwise.

18. DATA PROTECTION IMPLICATIONS

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

No

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

18.3 A DPIA has not been completed as the work of the Growth Zone programme includes no use or analysis of personal data. There are therefore no data protection implications.

Approved by: Louise Edwards, Information Manager

CONTACT OFFICER: Paul Forrester – Head of Growth Zone

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APPENDICES TO THIS REPORT: Appendix 1 – Growth Zone background

BACKGROUND PAPERS: None