

<b>REPORT TO:</b>	<b>CABINET</b>
<b>SUBJECT:</b>	<b>Waste Collection and Street Cleaning Contract (Veolia)</b>
<b>LEAD OFFICER:</b>	<i>Nick Hibberd, Corporate Director of Sustainable Communities, Regeneration and Economic Recovery</i> <i>Steve Iles Director of Sustainable Communities</i>
<b>CABINET MEMBER:</b>	Cllr Scott Roche - Cabinet Member Streets & Environment
<b>WARDS:</b>	<b>All</b>

**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, 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 31<sup>st</sup> 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 re-commission 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 re-commissioning 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.

<b>Commissioning timetable</b>	
<b>16 November 2022</b>	Cabinet (this report) decision on whether to extend the current contract with Veolia
<b>September 2022 to April 2023 (ongoing)</b>	<ul style="list-style-type: none"> <li>- 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.</li> <li>- Undertake Member engagement</li> <li>- Resident engagement</li> <li>- Cross cutting workshops with key internal stakeholders</li> <li>- Development of the procurement strategy report</li> </ul>
<b>March 2023</b>	<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>
<b>April 2023</b>	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.
<b>During 2024</b>	<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>
<b>April 2025</b>	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 31<sup>st</sup> 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-----  
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**BACKGROUND DOCUMENTS – LOCAL GOVERNMENT ACT 1972**

**Part B**

Appendix - Extension cost financial summary report