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To: Mayor Jason Perry (Chair)

Councillors Jeet Bains, Jason Cummings, Maria Gatland, Lynne Hale, Yvette Hopley, Ola Kolade, Scott Roche and Andy Stranack

A meeting of the **Cabinet** which you are hereby invited to attend, will be held **Wednesday**, **15 May 2024** at **6.30 pm. Council Chamber**, **Town Hall**, **Katharine Street**, **Croydon CR0 1NX**.

Katherine Kerswell Chief Executive London Borough of Croydon Bernard Weatherill House 8 Mint Walk, Croydon CR0 1EA Democratic Services Democratic.Services@croydon.gov.uk www.croydon.gov.uk/meetings

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AGENDA

1. Apologies for Absence

2. Minutes of the previous meeting (Pages 5 - 12)

To approve the draft minutes of Cabinet, Wednesday, 24 April 2024.

3. Disclosure of Interests

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

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

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

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

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

4. Urgent Business (If any)

To receive notice of any business not on the agenda which in the opinion of the Chair, by reason of special circumstances, be considered as a matter of urgency.

- 5. Stage One Recommendations from Scrutiny (Pages 13 22)
- 6. Stage Two Executive Responses to Scrutiny Recommendations (Pages 23 36)
- **7. Mayor's Business Plan 2022-2026 Performance Report** (Pages 37 110)
- 8. The Future of The Brighton Road Experimental Cycle Scheme (Pages 111 156)
- 9. Adult Social Care & Health Peer Challenge Findings & Next Steps (Pages 157 - 224)
- **10. Air Quality Delivery Plan 2024-2029** (Pages 225 288)
- 11. Exclusion of the Press and Public

PART B AGENDA

Agenda Item 2

Cabinet

Meeting of held on Wednesday, 24 April 2024 at 6.30 pm in Council Chamber, Town Hall, Katharine Street, Croydon CR0 1NX

MINUTES

Present: Mayor Jason Perry (Chair);

Lynne Hale (Deputy (Statutory) Executive Mayor and Cabinet Member for Homes (Vice-Chair)), Councillors Jeet Bains (Cabinet Member for Planning and Regeneration), Jason Cummings (Cabinet Member for Finance), Maria Gatland (Cabinet Member for Children and Young People), Yvette Hopley (Cabinet Member for Health and Adult Social Care), Ola Kolade (Cabinet Member for Community Safety), Scott Roche (Cabinet Member for Streets and Environment) and Andy Stranack (Cabinet Member for Communities and Culture)

Also Present: Councillors Rowenna Davis (Chair of Scrutiny and Overview Committee), Richard Chatterjee (Vice-Chair of Scrutiny and Overview) Stuart King (Leader of the Opposition), Callton Young (Deputy Leader of the Opposition and Shadow Cabinet Member for Finance), Janet Campbell (Shadow Cabinet Member for Health and Adult Social Care), Christopher Herman (Shadow Cabinet Member for Streets and Environment), and Chrishni Reshekaron (Shadow Cabinet Member or Homes)

PART A

146/24	Minutes of the previous meeting
	The minutes of the Cabinet meeting held on Wednesday 27 March 2024 were agreed as an accurate record.
147/24	Disclosure of Interests
	There were none.
148/24	Urgent Business (If any)
	There were no items of urgent business.
149/24	Scrutiny Stage One

The Executive Mayor introduced the Scrutiny Stage one report.

The Chair of Scrutiny and Overview Committee, Councillor Rowenna Davis, shared with Cabinet that:

- The Scrutiny and Overview Committee (the Committee) were pleased to note that once the extraordinary support from national government was taken into account that council was not projecting an overspend at the end of the year.
- The Committee noted that steps were being taken to cut costs were possible in regard to the housing departments overspend and to speed up the building works budgeted for within the capital accounts where there had been capital slippage in education.
- In regard to the council's debt burden, the Committee felt that more information could be provided in terms of negotiations with central government, and noted with appreciation the S151 officers offer to consider if more detail could be provided.
- Lastly, the Committee hope the final Homelessness and Rough Sleeping Strategy 2024-2029 will reflect the suggestions put forward, at Full Council. The intentions are excellent and the delivery plan is welcome but the Committee noted that there is concern with the current service and capacity as a whole for the department to systematically handle the sheer level of need whilst delivering the major transformation proposed.
- Councillor Rowena Davis praised the Cabinet Member for Homes, Lynne Hale, the Corporate Director of Housing, Susmita Sen and officers for always remaining open and grateful for feedback and working so hard to improve things within the sector.

The Cabinet Member for Finance, Councillor Jason Cummings provided reassurance to Cabinet that in regard to capital slippage in education anything that slipped into the following year remains within the programme. None of the construction items relate to heath and safety so there is no danger to the delays. Clarity was also provided in relation to the offer from S151 officers, this was in direct relation to conversations that take place between the Council and Civil Servants. There is no intention of providing any additional information in terms of direct negotiations with government regarding the debt position as it would be inappropriate.

The Deputy Mayor and Cabinet Member for Homes, Councillor Lynne added her thanks to Councillor Davis and pointed out that the restructure is one of a series of steps to improve the service. A DHLUC endorsed staffing structure which needs to be given a chance to imbed. The time and consideration the Committee had input to the representations were noted. The Executive Mayor Resolved to:

2.1 The Executive Mayor has the power to make the decisions set out in the recommendations contained within this report. The Executive Mayor in Cabinet is asked to:

1. Receive the recommendation arising from the meeting of the Streets & Environment Sub-Committee held on 30 January 2024 (Appendix 1).

2.2 To provide a substantive response to the recommendation (a Scrutiny Stage 2 Report) at the Cabinet meeting on 26 June 2024

150/24 Homelessness and Rough Sleeping Strategy 2024- 2029

The Executive Mayor introduced the Homelessness and Rough Sleeping Strategy Plan 2024 - 2029 which looks to improve the current service and address an issue which is a London wide problem having engaged with residents and partners.

The Deputy Mayor and Cabinet Member for Homes, Councillor Lynne Hale shared with Cabinet that the Homelessness and Rough Sleeping Strategy 2024 - 2029 in conjunction with the Housing Transformation programme agreed at Cabinet in December 2022 sets out how the council intend to improve the homeless and rough sleeping services and provide better outcomes for residents at risk of being made homeless and the homeless after years of neglect which will take years to fix. The proposals provide for a better structure which will respond better to and prevent the causes of homelessness, reliance on temporary accommodation and achieve better outcomes for residents and families. The Cabinet noted that extensive consultations were undertaken.

The Corporate Director of Homes, Susmita Sen added that the strategy provides the foundations of working ways going forward, a key part of the Transformation Programme and the start of an exciting journey.

The Shadow Cabinet Member for Homes, Councillor Chrishni Reshekaron welcomed the fact that the council was in a position to publish the proposed strategy. However. concerns were noted with the recommendations made the Scrutiny Committee. Serious by consideration will be given as to how the strategy can be improved and strengthened which will likely involve submissions of amendments which will be developed in time for the next full Council.

The Deputy Mayor and Cabinet Member for Homes, Councillor Lynne Hale responded that amendments should be submitted at the earliest opportunity to be able to consider and build them into the strategy and noted that it was clear that the Shadow Cabinet wanted to be part of creating the strategy and welcomed the positive contribution.

The Executive Mayor reiterated the sentiment that there is plenty of opportunity to feedback and welcomed engagement with the process to develop the strategy as early as possible rather than last minute objections and recommendations. This will come to full Council in due course.

The Executive Mayor in Cabinet **Resolved** to:

- **2.1** Agree to;
- 2.1.1 the Homelessness and Rough Sleeping Strategy 2024- 2029 as detailed in Appendix A;
- 2.12 the Homelessness and Rough Sleeping Strategy Summary Review detailed in Appendix B; and
- 2.1.3 the Summary Homelessness and Rough Sleeping Consultation Report detailed in Appendix C
- **2.2** Delegate authority to the Corporate Director of Housing to make minor amendments to the Strategy in consultation with the Executive Mayor and Cabinet Member for Homes following agreement by the Executive Mayor but prior to its recommendation and adoption by full Council.
- **2.3** For the reasons set out above **RECOMMEND TO FULL COUNCIL** the adoption of:
- 2.3.1 the Homelessness and Rough Sleeping Strategy 2024-2029 as set out in Appendix A;
- 2.3.2 the Homelessness and Rough Sleeping Strategy Summary Review in Appendix B; and
- 2.3.3 the Homelessness and Rough Sleeping Consultation Report in Appendix C.

151/24 NEC Housing System Phase 2 Implementation

The Executive Mayor introduced Phase 2 which reaffirms the council's commitment to rebuild and invest in the Housing Service since the reinvigoration of the project which went live in 2023 after numerous points of failure.

The Deputy Mayor and Cabinet Member for Homes, Councillor Lynne Hale informed Cabinet that the major problems previously encountered across the housing service were consistent with a lack of data hence the need for the old system to be replaced. Cabinet noted that the 2nd phase will expand on the mechanisms, efficiencies and polices of phase 1 allowing for better standards and a raft of benefits including timely and accurate data submissions of homelessness case levels thereby conforming with grant conditions required by DHLUC which will enable the council to secure maximum grant entitlements.

The Shadow Cabinet Member for Homes, Councillor Chrishni Reshekaron welcomed the phase 2 implementation as it will enable a more evidence driven service and asked what action is being taken to ensure there is a greater buy-in from users and an effective change in the management approach for embedding of the new modules.

The Corporate Director of Homes, Susmita Sen responded that the governance arrangements were reset, champions were identified across the business, and being clear about the outputs has resulted in good engagement. As a result a smooth roll-out of Phase 2 is anticipated.

The Executive Mayor in Cabinet **Resolved**:

- **2.1** To make a one off draw down from Housing Revenue Account reserves to fund:
 - One off cost for interim technical specialists to deliver the planned 12-month continuation phase of the NEC Housing project for the year 2024/25 at a cost of £1.459m
 - 2. Purchase of the NEC Risk module at a value of £56k bringing the total one off cost of £1.515m including the amount stated in 2.1.1.
- **2.2** To note that the portion of this project met by the General Fund is £156,000 in 2024/25 for the work done on Homelessness and Allocations.
- **2.3** To note that a permanent team for the ongoing improvements and internal support of the system is to be recruited.
- **2.4** To note that any contract related decisions will be made in accordance with the Tenders and Contracts Regulations and Public Contracts Regulations 2015.

152/24 Period 10 Financial Performance Report

The Executive Mayor introduced the Period 10 Financial Performance report which showed the council remains on track for a balance budget with a projection of a $\pm 1.3M$ underspend.

The Cabinet Member for Finance, Councillor Jason Cummings, shared with Cabinet that it was very encouraging to see that a slightly better than balanced budget is predicated although there are still opportunities for improvement and pressures to be revealed. Cabinet noted the two significant changes from the previous month;

- The reduction in the overspend position with Children, Young People and Education which was positive
- There was a negative shift in Housing which was on the radar. The issues related primarily to sector pressures and the ongoing issues present at Sycamore House and associated costs.

Neither resulted in an overspend situation.

The Shadow Cabinet Member for Finance, Councillor Callton Young, asked why the negotiations with the freeholder regarding compensation had taken so long. Further, is the prudence now alluded to an accounting judgement because the council does not expect to conclude the negotiations during the current financial year or because the council does not expect to receive the compensation forecast. Lastly, are the sixty-three long-term voids which used to house one hundred and thirty three residents a cause for concern given the ongoing battle against homelessness in Croydon.

The Cabinet Member for Finance, Councillor Jason Cummings advised that the freehold is contested therefore a projected legal position will ensue, especially when issues relate to the original leases which were not clear when created and the complexities involved with fire safety. In regard to prudence, putting the costs in now is not acceptance of the end position but the correct approach to a perceived risk by this council in terms of any future impact. It is the prudence approach. In conclusion, it is a concern residence are still void, full occupancy is preferred but where there is a fire safety issue that risk should not be taken.

The Corporate Director of Homes, Susmita Sen added that regrettably voids are being held but are a significant part of the Transformation programme. Void rates are decreasing, in the last year seven hundred have been let.

The Executive Mayor added that voids were regrettable but seven hundred in 12 months highlights how proactive the council is on the issue.

The Executive Mayor in Cabinet Resolved:

2.1 to note the General Fund revenue budget outturn is forecast to underspend by £1.3m at Period 10, after the budgeted utilisation of £63m capitalisation directions requested from DLUHC.

- 2.2 to note the progress in Medium Term Financial Strategy (MTFS) savings achievement of £32.4m (89.8%) against the total savings target of £36.1m as set out in paragraph 4.106.
- 2.3 to note the work that has commenced on the Council's Transformation Programme as set out from paragraph 4.101.
- 2.4 to note the Housing Revenue Account (HRA) revenue budget outturn is forecast to overspend by £12.0m.
- 2.5 to note the General Fund capital programme 2023-24 forecast underspend of £23.2m against the capital budget of £124.0m.
- 2.6 to note the HRA capital programme 2023-24 forecast overspend of £1.8m against the capital budget of £39.2m.
- 2.7 to note the Council's historic borrowing and subsequent debt burden continues to be critical to the non-sustainability of the Council's revenue budget. Dialogue with the Department for Levelling Up, Housing and Communities (DLUHC) continues, and the Council is seeking further financial support from Government in regard to its level of structural Indebtedness to ensure it can deliver sustainable Local Government services.
- 2.8 to note that the Council continues to operate Spend Control Panels to ensure that tight financial control and assurance oversight are maintained.
- 2.9 to note that current forecasts are based on the best available information at the time and will be subject to review and change during the financial year.

153/24 Housing Ombudsman Determinations 2023 - Report by the Monitoring Officer under section 5A of the Local Government and Housing Act 1989

The Executive Mayor introduced the report which outlines the response to the four determinations of Severe Maladministration relating to complaints made to the Housing Ombudsman regarding service failures that occurred between September 2019 and March 2022. Apologies were given by the Executive Mayor to the residents who were affected.

The Deputy Mayor and Cabinet Member for Homes, Councillor Lynne Hale informed Cabinet that the Housing Ombudsman and the Regulators for Social Housing expect the council to learn from these service failings and put them right as a matter of urgency, and shared further apologies to the residents which Cabinet noted. The Executive Mayor in Cabinet **Resolved:**

2.1 To note the Housing Service responses to these severe maladministration determinations at the strategic level within the Housing Transformation Programme, and action plans at a service level to address specific service concerns raised by these HO determinations.

The meeting ended at 19:12

Agenda Item 5 LONDON BOROUGH OF CROYDON

REPORT:		CABINET					
DATE		15 May 2024					
REPORT TITLE:	STAGE	1: RECOMMENDATIONS ARISING FROM SCRUTINY					
LEAD OFFICER:		Jane West, Corporate Director for Resources					
		Adrian May, Interim Head of Democratic Services T: 020 8726 6000 X 62529. Email: <u>adrian.may@croydon.gov.uk</u>					
LEAD MEMBER:	Councillor Rowenna Davis						
		Chair, Scrutiny and Overview Committee					
AUTHORITY TO TAKE DECISION:	Recommendations that have been developed from the Scrutiny and Overview Committee and its Sub-Committees since the last Cabinet meeting are provided in the appendices to this report. The constitution requires that an interim or full response is provided within 2 months of this Cabinet meeting.						
KEY DECISION?	Νο	N/A					
CONTAINS EXEMPT INFORMATION?	Νο	Public					
WARDS AFFECTED:	All						

1. SUMMARY OF REPORT

1.1 This report presents recommendations to the Executive from the meeting of the Scrutiny & Overview Committee held on 26 March 2024.

2 **RECOMMENDATIONS**

- **2.1** The Executive Mayor has the power to make the decisions set out in the recommendations contained within this report. The Executive Mayor in Cabinet is asked to:
 - 1. Receive the recommendations arising from the meeting of the Scrutiny & Overview Committee held on 26 March 2024 (Appendix 1).
 - 2. To provide a substantive response to these recommendations (a Scrutiny Stage 2 Report) at the Cabinet meeting on 24 July 2024.

3 REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

3.1 Part 4E of the Council's Constitution: Scrutiny and Overview Procedure Rules (paragraphs 8.5 – 8.7) and Section 9FE of the Local Government Act 2000 requires the executive to consider and respond to a Scrutiny and Overview report within 2 months beginning with the date on which the executive receives the report or recommendation.

4 BACKGROUND AND DETAILS

Scrutiny & Overview Committee

4.1 To provide additional context for the recommendations set out in appendices, outlined below are the conclusions reached by the Committee on the items considered.

Item: Croydon Community Safety Partnership

- **4.2** The Committee recognised the work of the Safer Croydon Partnership which had been delivered a wider range of activity across its priority areas, while operating within limited resources across a challenging and complex borough.
- **4.3** The Committee recognised the commitment of the Safer Croydon Partnership to increasing the level of community engagement in its work, which could be evidenced through the creation of the Community Safety Engagement Board.
- **4.4** The Committee recognised that the Safer Croydon Partnership had delivered a significant amount of work over 2023/24. It was agreed that future annual reviews should provide more quantitative data on the positive outcomes achieved through the Partnership.

Item: Violence Reduction Network – Draft Strategic Assessment

- **4.5** The Committee agreed that the Strategic Assessment was an excellent report which provided a clear and comprehensive summary of the key community safety challenges within the borough, with knife crime, robbery and reoffending rates being of particular concern.
- **4.6** The Committee commended the work of the Police in its partnership working with schools, including basing 22 full time officers in schools across the borough and providing extra patrols at school opening and closing times.
- **4.7** The Committee noted that, whilst work had started on its previous recommendation to create bespoke community plans to be created for high priority crime hot spot areas that involved their own unique community partners', the commitment to create plans for each area had not been completed, and this needed to be followed up.
- **4.8** The Committee agreed that Safer Neighbourhood Panel meetings were an important mechanism for securing community engagement in community safety matters and as

such would encourage all Members to promote awareness of their local meetings through their own community networks.

Item: Violence Against Women & Girls – Deep Dive

- **4.9** The Committee welcomed the development of the Tackling Violence Against Women and Girls Delivery Plan for Croydon, including a supporting report prepared by an independent consultant which had been informed by community engagement.
- **4.10** The Committee welcomed confirmation that a briefing would be provided for Members on the Tackling Violence Against Women and Girls Delivery Plan.
- **4.11** The Committee welcomed confirmation that the Council looked to transfer funding, where possible, to community and voluntary sector groups through the commissioning of services and would be looking to prioritise them for any future grant funding. It was agreed that it was important to maximise the effectiveness of this approach by raising awareness amongst these organisations of any new funding opportunities becoming available.
- **4.12** There was concern about the cultural competence and equal treatment of victims, particularly from black and ethnic minority communities, that had also been picked up by the work of the Council's independent consultant. This needed to be addressed.
- **4.13** There was a concern that awareness about the excellent services available for victims and survivors of VAWG, in both the statutory and third sector, were not well known by the public, and this needs to be addressed.
- **4.14** In light of comments from the community meetings about the lack of awareness of the services available in the borough, the Committee welcomed confirmation there would be a review of the information provided in the community safety pages of the Council website, as this would be an opportunity to provide a centralised source outlining the support available in the borough. It was suggested that the production of hard copies of this information should also be explored for community distribution.

5 ALTERNATIVE OPTIONS CONSIDERED

5.1 None. It is a statutory and constitutional requirement for the Executive to receive and respond to recommendations made by Scrutiny.

6 CONSULTATION / PRE-DECISION SCRUTINY

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

7 CONTRIBUTION TO EXECUTIVE MAYOR'S BUSINESS PLAN

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

Priority 4: Ensure good governance is embedded and adopt best practice. The Council must learn the lessons of past failures and embed sound governance processes to ensure that decision-making is transparent, open and honest. These must ensure effective control of our projects and programmes and encourage meaningful scrutiny and challenge.

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

Priority 2: Ensuring our borough is and feels like a safe place to live is a top priority. We will strengthen partnerships between the voluntary, business and statutory sectors in Croydon to share intelligence and coordinate action. The Safer Croydon Partnership will be restructured, with six delivery boards focussed on violence against women and girls, youth safety, hot spot areas, counter-terrorism, substance misuse and community engagement. We will support the Police to tackle crime and violence in our borough. We recognise what 'Friends' Groups can do to tackle low level antisocial behaviour (ASB) and will work with residents and partners to crack down on ASB hot spots.

IMPLICATIONS

8.1 FINANCIAL IMPLICATIONS

- **8.1.1** The Scrutiny recommendations to the Executive may have financial implications. Following the recommendations being received at Cabinet, the Executive will identify and consider any financial implications as part of their response.
- **8.1.2** If any recommendation is subsequently progressed for consideration and decision by the Executive Mayor in Cabinet, full financial (as well as legal and equalities implications) would be presented.

8.2 LEGAL IMPLICATIONS

- **8.2.1** Under Section 9F Local Government Act 2000 ("The Act"), Scrutiny and Overview Committee (SOC) have the powers to review or scrutinise decisions made, or other action taken in connection with the discharge of any executive and non-executive functions and to make reports or recommendations to the executive or to the authority with respect to the discharge of those functions. SOC also has the power to make reports or recommendations to the executive on matters, which affect the authority's area or the inhabitants of its area.
- **8.2.2** Under Section 9FE of the Act, there is a duty on Cabinet to respond to the scrutiny report, indicating what (if any) action Cabinet proposes to take, within 2 months of receiving the report and recommendations.
- **8.2.3** Approved by: Sandra Herbert Head of Litigation and Corporate Law on behalf of the Director of Legal Services and Monitoring Officer. (09/04/2024)

8.3 HUMAN RESOURCES IMPLICATIONS

8.3.1 There are no human resource implications arising directly from the contents of this report.

8.4 EQUALITIES IMPLICATIONS

- **8.4.1** The Council has a statutory duty, when exercising its functions, to comply with the provisions set out in the Sec 149 of the 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.
- **8.4.2** The recommendations in the appendices to this report have equality implications and will require an EQIA as part of the development of the proposals. The implications will be explored to identify impact and mitigation utilised to negate any adverse impact where necessary.

8.7 DATA PROTECTION IMPLICATIONS

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

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

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

NO

9 APPENDICES

Appendix 1 – Scrutiny Stage 1: Recommendations from Scrutiny & Overview Committee held on 26 March 2024

10 BACKGROUND DOCUMENTS

Meeting of the Scrutiny & Overview Committee held on 26 March 2024

https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=166&MId=3955

Appendix 1 – Recommendations arising from Scrutiny & Overview Committee, 26 March 2024

Item: Croydon Community Safety Partnership

Recommendation Number	Recommendation	Political Lead	Officer Lead
SOC.25.23/24	The Scrutiny & Overview Committee recommends that the Council uses its existing networks and resources to raise awareness of the Safer Neighbourhood Board and its meetings.	Cllr Ola Kolade	Kristian Aspinall
SOC.26.23/24	The Scrutiny & Overview Committee recommends that the Council through its role as a statutory partner uses its influence to ensure that the Safer Croydon Partnership has a clear focus on delivering tangible public outcomes for residents, rather than inputs and processes from officers.	Cllr Ola Kolade	Kristian Aspinall

Item: Violence Reduction Network – Draft Strategic Assessment

Recommendation Number	Recommendation	Political Lead	Officer Lead
SOC.27.23/24	Given the crime statistics indicate there is a high rate of reoffending within the borough, the Scrutiny & Overview Committee recommends that work is undertaken to benchmark against reoffending rates in other areas and to engage with boroughs with low reoffending rates to establish whether there is any best practice that could be used in Croydon.	Cllr Ola Kolade	Kristian Aspinall
SOC.28.23/24	The Scrutiny & Overview Committee recommends that the possibility of identifying and promoting libraries and schools as safe spaces is explored.	Cllr Ola Kolade	Kristian Aspinall

Item: Violence Against Women & Girls – Deep Dive

Recommendation Number	Recommendation	Political Lead	Officer Lead
	As the Tackling Violence Against Women and Girls Delivery Plan was still being developed, the Scrutiny & Overview Committee recommends that the follow areas are included in the final plan:		
	• To restart the pre-pandemic workstream providing targeted engagement about the signs of violence against women and girls with local businesses, such as barber shops, hairdressers, and those businesses in the nighttime economy.		
	 The provision of new Domestic Abuse Champions across the statutory partners was welcomed and as such the scope of this should be expanded to identifying and training potential community-based champions. 		
SOC.29.23/24	 The Delivery Plan needs to include a focus on children coming from families experiencing domestic abuse. Even if they are not experiencing the abuse directly, they will suffer fallout if it's happening between others in the home. 	Cllr Ola Kolade	Kristian Aspinall
	• There needed to be training provided for all statutory partners on the many different forms of violence against women and girls, and to improve the cultural competence of those who support victims.		
	 That a document is created to set out the support and services available for victims of violence against women and girls, that can be distributed within local communities. 		
	 The Delivery Plan needs to have a proper emphasis on perpetrators and how to hold them to account. 		

•	There needs to be clear focus in the Delivery Plan that Violence Against Women and Girls is a 'male problem' and as such there needed to be increased engagement with male community leaders about the issues involved.	
•	The possibility of partnering with Crystal Palace Football Club on a campaign to raise awareness of violence against women and girls should be explored.	
•	There should be key performance indicators included in the Mayor's Business Plan Performance reports that would measure the performance of the Delivery Plan.	

Agenda Item 6 LONDON BOROUGH OF CROYDON

REPORT:		CABINET					
DATE		15 May 2024					
REPORT TITLE:	Scrut	Scrutiny Stage 2 Responses to Recommendations arising from:					
		Homes Sub-Committee held on 23 October 2023 (Appendices 1 & 2) and the Scrutiny & Overview Committee held on 16 January 2024 (Appendices 3 & 4)					
LEAD OFFICER:		Jane West, Corporate Director for Resources					
	Adrian May, Interim Head of Democratic Services T: 020 8726 6000 X 62529. Email: <u>adrian.may@croydon.gov.uk</u>						
LEAD MEMBER:	Councillor Rowenna Davis Chair, Scrutiny and Overview Committee						
AUTHORITY TO TAKE DECISION:	w Commi recomme officer to	constitution requires that in accepting a recommendation, ith or without amendment, from a Scrutiny and Overview ittee or Sub-Committee, the Executive Mayor shall agree an action plan for the implementation of the agreed indations and shall delegate responsibility to an identified or report back to the Scrutiny and Overview Committee or mmittee, within a specified period, on the progress made in implementing the action plan.					
KEY DECISION?	No	N/A					
CONTAINS EXEMPT INFORMATION?	No	Public					
WARDS AFFECTED:		All					

1. SUMMARY OF REPORT

- 1.1 This report invites the Executive Mayor to approve the full response to the Scrutiny recommendations originally set out in the Stage 1 report presented to the Cabinet meeting held on 27 March 2024, including:
 - Action plans for the implementation of agreed recommendations, or;
 - Indicating where a recommendation is already in progress, or;
 - Reasons for rejecting the recommendations.

- 1.2 Following approval by the Executive Mayor, the response to the scrutiny recommendations will be reported to the Scrutiny and Overview Committee or relevant Sub-Committees.
- 1.3 The Constitution requires that in accepting a recommendation, with or without amendment, from a Scrutiny and Overview Committee or Sub-Committee, the Executive Mayor shall agree an action plan for the implementation of the agreed recommendations and shall delegate responsibility to an identified officer to report back to the Scrutiny and Overview Committee or Sub-Committee, within a specified period, on the progress made in implementing the action plan.

2. **RECOMMENDATIONS**

- 2.1. The Executive Mayor, in Cabinet, has the power to make the decisions set out in the recommendation below and is RECOMMENDED to:
 - 1. Approve the responses and action plans attached to this report as Appendices 1, 2, 3 & 4; and
 - 2. Delegate authority to the officers identified in Appendices 1, 2, 3 & 4 to report back to the Scrutiny and Overview Committee, or relevant Sub-Committee, within the periods specified in the agreed responses and action plans, and on progress made in implementing any action plan.

3 REASONS FOR RECOMMENDATIONS/PROPOSED DECISION

- 3.1 Part 4E of the Council's Constitution: Scrutiny and Overview Procedure Rules (paragraphs 8.5 – 8.7) and Section 9FE of the Local Government Act 2000 requires the Cabinet to respond to a Scrutiny and Overview report within 2 months beginning from the date on which the executive received the report.
- 3.2 Detailed reasons for individual responses and action plans recommended are contained in the appendices to this report.
- 3.3 The Scrutiny and Overview Committee (or the relevant Sub-Committee) is responsible for monitoring the progress made with the implementation of any recommendations accepted by the Executive Mayor

4 SCRUTINY RECOMMENDATIONS

- 4.1 The scrutiny recommendations are set out in the appendices to this report.
- 4.2 The appendices also include a detailed response to the scrutiny recommendations, including: -
 - 1. An action plan for the implementation of agreed recommendations.
 - 2. Where recommendations have been rejected, an explanation of the reasons for this.
 - 3. Where it is considered that a recommendation is already in progress, an explanation with be given to confirm how it is being delivered.

5 ALTERNATIVE OPTIONS CONSIDERED

5.1 These are contained in the appendices to this report.

6 CONSULTATION / PRE-DECISION SCRUTINY

- 6.1 The recommendations have been developed following the deliberations of either the Scrutiny and Overview Committee or one of its Sub-Committees.
- 6.2 The recommendations in the appendices to this report may involve further consultation and as each recommendation is developed, these implications will be explored and approved through appropriate decision-making routes.
- 6.3 Some of the recommendations in the appendices to this report are the result of Pre-Decision Scrutiny.

7 CONTRIBUTION TO EXECUTIVE MAYOR'S BUSINESS PLAN

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

Priority 4: Ensure good governance is embedded and adopt best practice. The Council must learn the lessons of past failures and embed sound governance processes to ensure that decision-making is transparent, open and honest. These must ensure effective control of our projects and programmes and encourage meaningful scrutiny and challenge.

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

Priority 4: Ensure new homes are safe, well-designed and in keeping with the local area. New development will be design-led, not density-led. While we must continue to

plan for new homes, schemes must respect the views of local people, enhance the character of our places, and recognise the need for amenity space.

8 IMPLICATIONS

8.1 Financial Implications

8.1.1 The recommendations set out in the appendices to this report may have financial implications and as each recommendation is developed the financial implications will be explored and approved through appropriate decision-making routes.

Comments approved by Allister Bannin, Director of Finance (Deputy s151), 15/04/24.

8.2 Legal Implications

- 8.2.1 Under Section 9F Local Government Act 2000 ("the Act"), Scrutiny and Overview Committee have the power to review or scrutinise decisions made or other action taken in connection with the discharge of any executive and non-executive functions and to make reports or recommendations to the executive or to the authority with respect to the discharge of those functions. The Committee also has the power to make reports or recommendations to the executive or to the authority on matters, which affect the authority's area or the inhabitants of its area. To discharge this scrutiny function, the Committee has appointed Scrutiny Sub-Committees. Pursuant to the above provisions the Committee, and its Sub-Committees, have made recommendations arising from their scrutiny of areas under their remit, which are detailed in the attached appendices.
- 8.2.2 Under Section 9FE of the Act, there is a duty on the executive to respond to the scrutiny reports, indicating what (if any) action they propose to take, within 2 months beginning with the date on which the executive received the report.
- 8.2.3 Approved by: Sandra Herbert, Head of Litigation & Corporate Law, on behalf of the Director of Legal Services and Monitoring Officer. (09/04/2024)

8.3 HUMAN RESOURCES IMPLICATIONS

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

8.4 EQUALITIES IMPLICATIONS

- 8.4.1 The Council has a statutory duty, when exercising its functions, to comply with the provisions set out in the Section 149 Equality Act 2010. The Council must, in the performance of its functions, therefore, have due regard to:
 - 1. eliminate discrimination, harassment, victimisation, and any other conduct that is prohibited by or under this Act.
 - 2. advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it.

- 3. foster good relations between persons who share a relevant protected characteristic and persons who do not share it.
- 8.4.2 The recommendations set out in the appendices of this report have equality implications and will require an EQIA as part of the development of the proposals. The implications will be explored to identify impact and mitigation utilised to negate any adverse impact where necessary.

9 APPENDICES

Appendix 1 – Scrutiny Stage 2 Responses: Recommendations from Homes Sub-Committee held on 23 October 2023, Item: Croydon Housing Approach to the development of the Resident Engagement Structure

Appendix 2 – Scrutiny Stage 2 Responses: Recommendations from Homes Sub-Committee held on 23 October 2023, Item: Report on principles for HRA Business Plan 2024-25

Appendix 3 – Scrutiny Stage 2 Responses: Recommendations from Scrutiny & Overview Committee held on 16 January 2024, Item: Capital Programme and Capital Strategy 2023-29

Appendix 4 – Scrutiny Stage 2 Responses: Recommendations from Scrutiny & Overview Committee held on 16 January 2024, Item: Quarterly Procurement Plan Update

10 BACKGROUND DOCUMENTS

Meeting of the Homes Sub-Committee held on 23 October 2023 https://democracy.croydon.gov.uk/ieListDocuments.aspx?Cld=485&Mld=3707

Meeting of the Scrutiny & Overview Committee held on 16 January 2024

https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=166&MId=3514

Meeting of the Cabinet held on 27 March 2024

https://democracy.croydon.gov.uk/ieListDocuments.aspx?CId=183&MId=3580

Appendix 1 – Item: Croydon Housing Approach to the development of the Resident Engagement Structure

Considered by Homes Sub-Committee on 23 October 2023

REC No.	SCRUTINY RECOMMENDATION	DEPARTMENT AND CABINET MEMBER RESPONDING	ACCEPTED / PARTIALLY ACCEPTED / ALREADY IN PROGRESS / REJECTED (inc. reasons for rejection)	IDENTIFIED OFFICER	FINANCIAL IMPLICATIONS	TIMETABLE FOR IMPLEMENTATION OF RECOMMENDATIONS IF ACCEPTED (i.e. Action Plan)	DATE OF SCRUTINY MEETING TO REPORT BACK
HS.9.23/24	The Homes Sub- Committee recommends that ward councillors are informed when there is a planned resident engagement event within their constituency.	Councillor Lynne Hale Housing	Accepted Events will be advertised to Members going forward. The Department will look at developing an events calendar to facilitate this.	Susmita Sen, Corporate Director of Housing	N/A	N/A	Homes Sub- Committee 16 July 2024

Appendix 2 – Item: Report on principles for HRA Business Plan 2024-25

Considered by Homes Sub-Committee on 23 October 2023

REC No.	SCRUTINY RECOMMENDATION	DEPARTMENT AND CABINET MEMBER RESPONDING	ACCEPTED / PARTIALLY ACCEPTED / ALREADY IN PROGRESS / REJECTED (inc. reasons for rejection)	IDENTIFIED OFFICER	ANY FINANCIAL IMPLICATIONS	TIMETABLE FOR IMPLEMENTATION OF RECOMMENDATIONS IF ACCEPTED (i.e. Action Plan)	DATE OF SCRUTINY MEETING TO REPORT BACK
HS.10.23/24 Page 3	The Homes Sub- Committee recommends that there is further engagement with residents on the benefits of the stock survey, including work with the contractor, using the social values aspects of their contract.	Councillor Lynne Hale Housing	Already in Progress Stock condition surveys continue as we move to achieving our next target of 60% of properties surveyed by 30 September 2024. Article included in resident newsletter setting out the reason for the surveys and the benefits this data will bring; Presentations undertaken to resident groups including the Tenant and Leaseholder Panel in January 2024, and online resident survey undertaken in January 2024. Further articles to be included in resident newsletters in Spring and Summer 2024.	Susmita Sen, Corporate Director of Housing	N/A	Target to achieve 40% by 31/3/24 and 60% by 30/9/24	Homes Sub- Committee 28 October 2024

Appendix 3 – Item: Capital Programme and Capital Strategy 2023-29

Considered by Scrutiny & Overview Committee on 16 January 2024

REC No.	SCRUTINY RECOMMENDATION	DEPARTMENT AND CABINET MEMBER RESPONDING	ACCEPTED / PARTIALLY ACCEPTED / ALREADY IN PROGRESS / REJECTED (inc. reasons for rejection)	IDENTIFIED OFFICER	ANY FINANCIAL IMPLICATIONS	TIMETABLE FOR IMPLEMENTATION OF RECOMMENDATIONS IF ACCEPTED (i.e. Action Plan)	DATE OF SCRUTINY MEETING TO REPORT BACK
soc.22.23/ 24 Page	The Scrutiny & Overview Committee recommends that organisations including the LGA or London Councils are approached to review whether there is any currently untapped external funding sources available to the Council for capital projects, to provide reassurance that every avenue for inward funding was being explored.	Councillor Jason Cummings Resources	Already in Progress All capital projects are required to produce a business case that includes identifying funding opportunity and approach. The majority of the capital spend undertaken by the Council relates to educational projects where funding is provided by the DfE.	Allister Bannin, Director of Finance Huw Lewis Director Commercial Investment & Capital	N/A	N/A	Scrutiny & Overview Committee 4 June 2024
Ω SOC.23.23/ 24	The Scrutiny & Overview Committee recommends that the potential business case for either extending the existing Growth Zone or establishing a new Growth Zone are explored, which would give Croydon the chance to keep a higher proportion of any new business rates generated as a result, rather than passing them to central government.	Councillor Jason Cummings Resources	Rejected The current Growth Zone within the Croydon Opportunity Area was brought into force in 2018 through a Parliament Statutory Instrument. Establishing the business case and justification for the Growth Zone to the GLA and government took approximately three and a half years. The establishment of a Growth Zone is a lengthy and legislative process. Growth Zone models nationally are unique, so a risk is whether further arrangements will be supported. Given the existence of the Growth Zone, it is considered the focus should be regenerating the Town Centre and attracting inward investment to increase Business Rate receipts above the 2018 base position to increase Growth Zone income. This is equally the case for an extension to the existing Growth Zone.	Steve Dennington, Head of Spatial Planning, Growth Zone and Regeneration	N/A	N/A	Scrutiny & Overview Committee 4 June 2024

Appendix 4 – Item: Quarterly Procurement Plan Update

Considered by Scrutiny & Overview Committee on 16 January 2024

REC No.	SCRUTINY RECOMMENDATION	DEPARTMENT AND CABINET MEMBER RESPONDING	ACCEPTED / PARTIALLY ACCEPTED / ALREADY IN PROGRESS / REJECTED (inc. reasons for rejection)	IDENTIFIED OFFICER	FINANCIAL IMPLICATIONS	TIMETABLE FOR IMPLEMENTATION OF RECOMMENDATIONS IF ACCEPTED (i.e. Action Plan)	DATE OF SCRUTINY MEETING TO REPORT BACK
SOC.24.23/ 24	The Scrutiny & Overview Committee recommends that a method for publishing further information on agreed contract variations is explored through the procurement reporting process.	Councillor Jason Cummings Resources	Already in Progress The proposed Procurement and Contract management improvement plans set out how the Council is seeking to improve its data management as well as address the requirements of publication of new data sets as set out in the new Procurement Act 2024, due for release and implementation in October 2024.	Scott Funnell, Head of Strategic Procurement Huw Lewis Director of Commercial Investment and Capital	N/A	N/A	Scrutiny & Overview Committee 4 June 2024

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Agenda Item 7

LONDON BOROUGH OF CROYDON

REPORT:	CABINET
DATE OF DECISION	15 May 2024
REPORT TITLE:	Mayor's Business Plan 2022-2026 Performance Report
CORPORATE DIRECTOR / DIRECTOR:	Marie Snelling, Assistant Chief Executive (interim) David Courcoux, Director of Policy, Programmes and Performance
LEAD OFFICER:	Caroline Bruce, Head of Programmes & Performance
LEAD MEMBER:	Mayor Jason Perry, Executive Mayor of Croydon
KEY DECISION?	Νο
CONTAINS EXEMPT INFORMATION?	Νο
WARDS AFFECTED:	ALL

1 SUMMARY OF REPORT

- 1.1 This report presents performance against the five outcomes (listed below), within the Mayor's Business Plan 2022-26 which was approved at Cabinet in November 2022 and Full Council in December 2022.
 - 1. The council balances its books, listens to residents and delivers good sustainable services.
 - 2. Croydon is a place of opportunity for business, earning and learning.
 - 3. Children and young people in Croydon have the chance to thrive, learn and fulfil their potential.
 - 4. Croydon is a cleaner, safer and healthier place, a borough we're proud to call home.
 - 5. People can lead healthier and independent lives for longer.
- 1.2 The Executive Mayor's Business plan is the Council's core strategic document setting out its objectives and priorities for the next four years. It reflects the Executive Mayor's manifesto pledges and priorities, as set out in a report to Cabinet in June 2022.
- 1.3 The Appendices of this report will monitor delivery of the Executive Mayor's Business Plan 2022-26. Given the Plan includes borough wide objectives, the performance indicators include both Council and Partnerships measures. Council measures are those which the Council is the lead in terms of delivery. A small number of these measures do not have a target set as these are tracking metrics. Whilst it is not appropriate to set targets for such measures, it is important that the performance is

tracked to monitor growth and development.

- 1.4 Within the appendices of this report, there are 20 partnership measures which monitor work with our partners, such as the Police and NHS. Our partners are the lead for the delivery of outcomes, and the council has an important role to play in promoting partnership working to support these outcomes. Partnership measures are indicated by a blue background and labelled as such to allow them to be easily distinguished. The setting of, and delivery against the targets for these measures are set (where appropriate) by our partners for their use and are not included within this report.
- 1.4 At its meeting on 26 September 2023, the Scrutiny & Overview Committee reviewed the proposed key performance indicators (KPI's) to be used to monitor the delivery of the Mayor's Business Plan. The Committee was supportive of the initial set of KPI's, and noted their clarity and measurability. The Committee welcomed confirmation that the KPI's would continue to be reviewed and refined in the months and years to come to ensure that successful delivery of the Mayor's Business Plan can be accurately assessed.
- 1.5 The performance report in Appendix A, gives an overview of performance across each of the five outcomes within the plan. Appendix B, provides detailed performance data on the Council's progress in delivering the outcomes within the Mayor's Business Plan as at 28 February 2024.

2 **RECOMMENDATIONS**

For the reasons set out in the report and Appendices, the Executive Mayor in Cabinet, is recommended to:

- 2.1 Note the Mayors Business Plan performance report (Appendix A and B) with latest data available on 28 February 2024 (unless otherwise stated) regarding overall council and partnership performance, and actions being taken to improve outputs.
- 2.2 Note that it is necessary to review measures within outcomes one, four and five of the Mayor's Business Plan to reflect changes to statutory reporting and the requirements of independent boards, as detailed in points 7.3 and 7.4 of this report.
- 2.2 Note the enhanced escalation process for areas where performance requires improvement, as detailed in section 8 of this report.

3 REASONS FOR RECOMMENDATIONS

3.1 It is essential that the Council takes steps to ensure that a robust performance management plan and framework are in place, alongside the work of the Programme Management Office, Finance and Risk. Delivery of the objectives within the Executive Mayor's Business Plan are unlikely to happen without it.

4 BACKGROUND AND DETAILS

4.1 The Executive Mayor's Business Plan was approved at Cabinet in November 2022 and Full Council in December 2022. Corporate Performance Reports will reflect progress against the Executive Mayor's Business Plan 2022-26 on both a Council and Partnership level as this is a plan for Croydon the borough. 4.2 It is important to note that accountability of performance to deliver the outputs remains with the relevant Directorate(s).

5 EXECUTIVE MAYOR'S BUSINESS PLAN 2022-2026

- 5.1 The Executive Mayor's Business Plan sets out the Executive Mayor's vision for Croydon. This Plan consists of five outcomes to be achieved by the Council over the next four years, with priority aims to deliver those outcomes, along with the high-level actions required. The full Business Plan van be viewed using this link <u>https://www.croydon.gov.uk/mayors-business-plan-2022-2026</u>
- 5.2 The financial challenges detailed in Section 114 reports and the two Reports in the Public Interest in recent years have reduced the resources available to the Council, which means that it will be forced to do less in future. The Executive Mayor's mission is to transform the Council's way of working, instilling financial discipline, making services more efficient, balancing the budget, changing how services are run, securing maximum value for money, instilling strong governance, listening to residents' concerns and restoring pride in Croydon. The Council will work closely with partners from the business, statutory, and voluntary sectors to bring more resources to the borough and to support and empower local communities so that together we can transform the Council and deliver services for the borough.

6 Corporate Performance Report (Appendix A & B)

- 6.1 This report reviews performance of the actions currently aligned to delivery of the five outcomes detailed within the Executive Mayor's Business Plan. This, and historical performance reports monitoring the progress against the Croydon Renewal Plan, and Corporate Priorities, presented to Cabinet can be viewed at https://www.croydon.gov.uk/council-and-elections/freedom-information-and-corporate-performance
- 6.2 **Key Performance Indicators (KPI's)** Regular review and monitoring against the agreed performance measures and the impact performance will have against finance, risk and programme deliverables.
- 6.4 The performance report in appendix A gives an overview of performance on 28 February 2024 (unless otherwise stated). The measures are listed under the relevant outcomes of the Executive Mayor's Business Plan. KPI's which are at, or above target, will receive a green status. Those within 10% of achieving target an amber status and those which are operating below target by 10% or more, a red status. Where a measure has no target as it has not yet been set, or it is not appropriate to set a target, the RAG status will be shown as grey. Where a measure has either no data or target at the moment, the RAG status will be shown as black.
- 6.5 Where measures are under performing, with a RAG rating of amber or red, service commentary to the actions in place to address under performance is provided to add context when reviewing. Those measures which are performing well and to target, are not required to supply any commentary at present. Future reports to cabinet will have commentary provided across all measures irrespective of the RAG rating.

6.6 Where timely data is not provided, or a target has not been set (council KPI's only, excluding tracking metrics), this may create a risk as is it not possible to robustly monitor performance.

7 Reviewing measures and targets.

- 7.1 In line with the council's maturing approach to data, it is necessary to review measures within outcomes one, four and five of the Mayor's Business Plan to take into account changes to statutory reporting and the requirements of independent boards, as detailed in points 7.3 and 7.4 of this report.
- 7.2 As part of the Housing transformation programme, the Housing directorate has transitioned to a new I.T system (NEC). The phased transition to the new system included a period of staff training on data inputting, report extraction and the development of performance reports on the system. This coupled with the Housing Directorate undergoing a significant period of change, including mobilisation of new contractors, new repairs contact centre and the restructure of the Homelessness division.
- 7.3 Following discussion with the Housing Improvement Board, and with the support of the Mayor and the Improvement and Assurance Panel (IAP), the Housing Directorate proposes a review of some performance targets for 2024-25. With the commencement of the new housing repairs contracts in August 2023 it has become clear that repairs demand is considerably higher than was anticipated based on the information available at contract procurement. At the same time additional data concerning households in temporary accommodation needs to be factored into target setting. This review of affected KPIs will provide more realistic targets for 2024-25, based on sound data, and will be conducted in consultation with the Mayor, the Housing Improvement Board and the IAP.
- 7.4 The Adult Social Care, Short and Long Term (SALT) data return has been superseded by the Client Level Data (CLD) return, which is a statutory requirement. Capturing CLD will support the understanding of people's journeys through the social care system. As such, the measures within outcome five of the Mayor's Business Plan relating to Adult Social Care, will be reviewed to ensure they are fit for purpose and aligned with the new statutory way of reporting.
- 7.5 Any proposed changes to measures and or targets, will be presented to Cabinet for review and sign off where appropriate.

8 Assurance, Governance and Escalation of performance

8.1 **Directorate and statutory performance reporting** – Performance reports continue to be presented to all Directorate Management Team meetings each month. Corporate Directors / Directors are responsible for discussing the contents of directorate and statutory performance reports with the relevant Cabinet Member and the Executive Mayor to ensure line of sight and accountability. The report is then presented to the Corporate Management Team (CMT) on a monthly basis, to allow check and challenge.

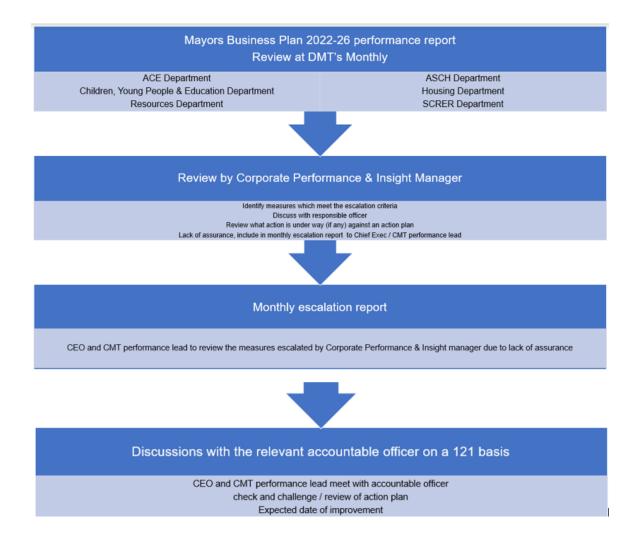


- 8.2 The Head of Programmes and Performance has independent oversight of all performance reports relating to the Executive Mayor's Business Plan 2022-26 which are also reviewed monthly at Corporate and Directorate Management Team meetings (as detailed in point 8.1). In order to ensure that under performance is addressed, an escalation process is triggered applying the following criteria;
 - Measure which are under performing for three consecutive reporting periods in excess of 10% off target **and**
 - Direction of travel worsening over the same period, and
 - No action plan in place or, action plan in place is having no effect in expected timescale.

And where there is

- No assurance that the action plan in place is fit for purpose / delivering improvement.
- Lack of investment in order that performance can be improved.
- Lack of action / speed of improvement resulting in substantial risk to the organisation.
- A detrimental impact on the delivery of corporate / Mayor priorities / corporate risk register, Exit Strategy priorities, transformation strategy.
- 8.3 Measures which meet some or all of this criterion, will feature in an exemption report which will be ordered based on how much of the criteria above is met by each measure. The Corporate Performance & Insight manager will work with service leads to define the current status of the measure, to ensure that the report is accurate.
- 8.4 These details are recorded and presented to the Chief Executive and Corporate Management Team (CMT) performance lead in order that those responsible for the measure will meet with the Chief Executive and the CMT lead for Performance. The Chief Executive / CMT performance lead, will then lead discussions with the relevant accountable officer on a 1:1 basis. The outcome will be reported to CMT as an escalation for recording the action taken. These sessions will take place monthly commencing May 2024.
- 8.5 The Corporate Performance & Insight Manager will monitor the actions agreed from these sessions and the associated performance. Where areas are not improving as documented they will feed back into the escalation process above.

8.6 The diagram below shows the stages or reporting through to escalation.



9 ALTERNATIVE OPTIONS CONSIDERED

9.1 None.

10 CONSULTATIONS

10.1 None.

11 CONTRIBUTIONS TO EXECUTIVE MAYOR'S BUSINESS PLAN

11.1 This performance report monitors progress made against the five outcomes within the Executive Mayor's Business Plan 2022-26

12 IMPLICATIONS

12.1 FINANCIAL IMPLICATIONS

12.1.1 There are no direct financial implications arising from this report. There will be financial implications associated with the delivery of the projects and actions within the Mayor's Business Plan which have been factored into the Medium Term Financial

Strategy. The delivery of these projects and actions, and the resulting savings is essential. It is therefore critical that effective monitoring and reporting is in place.

Approved by: Ian Geary, Interim Head of Corporate Finance, on behalf of Allister Bannin, Director of Finance, 25 April 2024.

12.2 LEGAL IMPLICATIONS

- 12.2.1 The Council as a best value authority must 'make arrangements to secure continuous improvement in the way in which its functions are exercised, having regard to a combination of economy, efficiency and effectiveness' under Section 3(1) of the Local Government Act 1999 (LGA). The best value duty applies to all functions of the Council and monitoring of performance information and acting on the findings are an important way in which that obligation can be supported.
- 12.2.2 On 20 July 2023 the Secretary of State(SoS) for Levelling Up, Housing and Communities issued Directions under Section 15(5) of the LGA to the Council due to its failure to comply with its best value duty. The SoS Directions require the Council to take a number of actions which include 'to secure as soon as practicable that all the Authority's functions are exercised in conformity with the best value duty'. The Directions are expected to remain in force until 20 July 2025 but could be amended or revoked at an earlier date by the SoS if appropriate. The recommendations in this report are supportive of the actions required under the SoS Directions.
- 12.2.3 Separately, the government has established the Office for Local Government (Oflog), a new local government performance body in England. It is proposed that Oflog will "provide authoritative and accessible data and analysis about the performance of local government and support its improvement". At present, the Local Authority Data Explorer covers only 4 areas of performance, adult social care, waste management, adult skills and local authority finance, but it is intended to add more over time.
- https://www.gov.uk/government/publications/office-for-local-government-understanding-andsupporting-local-government-performance/office-for-local-government-understandingand-supporting-local-government-performance
- 12.2.4 Any legal implications arising in relation to individual actions within the Mayor's Business Plan will need to be considered as and when projects and decisions come forward for approval.

Approved by: Approved by: Sandra Herbert, Head of Litigation & Corporate Law on behalf of the Director of Legal Services and Monitoring Officer. 16 April 2024.

12.3 EQUALITIES IMPLICATIONS

- 12.3.1 In April 2011 the Equality Act (2010) introduced the public sector duty which extends the protected characteristics covered by the public sector equality duty to include age, sexual orientation, pregnancy and maternity, and religion or belief.
- 12.3.2 Section 149 Equality Act 2010 requires public bodies to have due regard to the need to:
 - eliminate unlawful discrimination, harassment, victimisation and any other. conduct prohibited by the Act.

- advance equality of opportunity between people who share a protected characteristic and people who do not share it; and
- foster good relations between people who share a protected characteristic and people who do not share it.
- 12.3.3 Having due regard means consciously thinking about the three aims of the Equality Duty as part of the process of decision-making. This means that decision makers must be able to evidence that they have taken into account any impact of the proposals under consideration on people who share the protected characteristics before decisions are taken.
- 12.3.4 The refreshed Equality Strategy 2023 2027 is the key performance tool for our equality deliverables. Directorate Service objectives and individual objectives are inclusive of equalities deliverables included in the Equality strategy. Organisational priorities are also inclusive of equality targets in respect of the organisation and the community.

Approved by: Helen Reeves for the Equalities Programme Manager, 25 April 2024

12.4 HUMAN RESOURCES IMPACT

- 12.4.1 Key to delivery of the Executive Mayor's Business Plan will be to retain and invest in a skilled workforce, who are enabled and engaged through a positive organisational culture. The council's People and Cultural Transformation Strategy has been developed, together with a detailed workforce co-created action plan to be aligned to the Executive Mayor's Business Plan, supporting building workforce skills and capacity for the future. It will be essential to create a golden thread, where all staff can see how their work links to the work of their team, their division, their directorate, the council's service plans, and the Executive Mayor's Business Plan.
- 12.4.2 Any planned service changes through informed review, will be subject to the council's organisational change procedure and formal consultation with staff and trade unions.

Approved by: Dean Shoesmith, Chief People Officer, Dated: 26 March 2024.

13 APPENDICES

12.1 Appendix A: Overview Performance Report – Latest available data as of 28 February 2024 (unless otherwise stated).

Appendix B: Detailed Performance Report – Latest available data as of 28 February 2024 (unless otherwise stated)

14 BACKGROUND DOCUMENTS

13.1 Executive Mayor's Business Plan 2022-26

APPENDIX A Mayor's Business Plan 2022-26 Summary Performance Report February 2024

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As I complete my second year in office as Croydon's first Executive Mayor, I am proud of the progress my Administration has made. Whilst we are still on a journey of improvement, I have been relentless in my pursuit of tackling the Council's toxic financial legacy and providing the much-needed discipline, leadership and sound governance this Council lacked. We have not been subject to a S114 notice for some time and are tightly managing all parts of our budget, with Government recognising that Croydon continues to make good progress.

This quarter, I have continued to engage with key partners to continue to restore pride in our borough. Growing confidence in the borough was recognised by Howard Dawber, Deputy Mayor of London for Business, who on a recent visit identified Croydon as a 'high priority' for investment due to its 'enormous potential.' London Gatwick has also signed an Economic Growth Charter with the Council further strengthening confidence in Croydon with the airport generating over £265 million for Croydon's economy in 2023, supporting over 3,600 local jobs.

I have also continued to deliver one of my key priorities which was to restore faith in the planning system. We have revised the Local Plan, which goes out to consultation this month, removing intensification zones, protecting character, and emphasising design over density.



We remain committed to delivering new affordable homes for Croydon residents, but not at the expense of quality standards. I was delighted that we secured £53 million of Government housing grant through the GLA to rebuild Regina Road, providing safe, well-designed council homes for generations to come.

I have also been working to revitalise our district centres and the Council has now received a planning application from Polaska to build a pool and leisure centre in Purley, along with a new public square which will help regenerate Purley and boost the local economy. The second blitz clean campaign is underway in Thornton Heath, part of my ongoing commitment to making our streets and district centres cleaner.

'Listening to Croydon' residents was a key commitment in my manifesto, and I recently hosted 'Mayor's Question Time' sessions in Sanderstead and South Norwood and I will continue to host these sessions across the borough. I am immensely proud of our year as the London Borough of Culture, and the excellent exhibitions at Museum of Croydon: REWIND: This is Croydon's Music, Routes to Roots and Little Manhattan which provided an opportunity to celebrate our unique identity, communities, rich heritage, and creativity.



I have proudly overseen investment in our green and open spaces, recently opening a further two new playgrounds as part of the Playground Investment Programme, collaborating with local communities to create environments where our young children can thrive.

We have come a long way in the last two years to bring meaningful change to Croydon. We still have a long journey ahead, but I am determined to not only restore pride in Croydon but also restore confidence in Croydon, so that we may build a brighter future together.

Corporate Performance Framework RAG Rating Key

The Corporate Performance Indicators are RAG rated by the criteria outlined in the table below.

Key	RAG
Performance has not met target and is out by over 10% / differs from comparators by over 10%	
Performance has not met target but is within 10% / differs from comparators but is within 10%	
Performance has met or exceeded target / has matched one or more comparators	1
Data has been submitted, but no target has been set.	1
No data has been submitted.	

Mayo	r's Business Plan 2022-26 Performar	nce Indicator	rs - Outcome	1 - The Cou	ncil Balan	ces its books	s, listens to re	esidents and	delivers g	ood susta	inable services	
Ref.	Indicator	Council or partnership working	Bigger or smaller is better?	Frequency	Target	Latest date	Latest value	Previous value	Direction of travel	RAG	Benchmarking timeframe	Benchmark
M01	Variance against net budget requirement	Council	Smaller is better	Monthly	£0	Dec 2023	-£1,500,000	-£1,300,000	1	Green	No comparable data available	
M03	Council Tax 'In-year' Collection rate	Council	Bigger is better	Monthly	91.84%	Apr-23-Feb-24	90.15%	85.70%	1	Amber	No comparable data available	
M05	Non-Domestic Rates (Business Rates) Collection rate	Council	Bigger is better	Monthly	96.0%	Apr-23-Feb-24	97.9%	96.2%	1	Green	No comparable data available	
M06	Rent collection on General needs stock	Council	Bigger is better	Monthly	97.0%	Apr-23-Feb-24	96.5%	96.6%	*	Amber	No comparable data available	
M07	Satisfaction that the landlord listens to tenant views and acts upon them	Council	Bigger is better	Quarterly	44%	Q3 23/24	46%	42%	1	Green	2021-2023 London median	44%
M08	% who are very or fairly satisfied with the way Croydon Council deals with repairs and maintenance	Council	Bigger is better	Quarterly	56%	Q3 23/24	51%	60%	*	Amber	2021-2023 London median	56%
M10	Average council contact centre wait time	Council	Smaller is better	Monthly	120s	Feb 2024	173s	436s	1	Red	No comparable data available	
MICA	Average council contact centre wait time (Responsive repairs call centre only)	Council	Smaller is better	Monthly	20s	Feb 2024	222s	447s	1	Red	No comparable data available	
ge	Sickness - number of sick days per FTE	Council	Smaller is better	Monthly	7.60	Mar-23-Feb-24	8.50	8.20	✦	Red	Rolling Year to Mar 21 (London position)	7.70
MUT	% of residents that ended the call before we spoke to them	Council	Smaller is better	Monthly	5%	Feb 2024	10%	24%	1	Red	No comparable data available	
О М13а	% of residents that ended the call before we spoke to them (Responsive repairs call centre only)	Council	Smaller is better	Monthly	5%	Feb 2024	12%	19%	1	Red	No comparable data available	
M14	FOI responded to on time	Council	Bigger is better	Monthly	90%	Jan 2024	80%	88%	*	Red	No comparable data available	
M15	SARs responded to on time	Council	Bigger is better	Monthly	90.0%	Jan 2024	43.0%	65.0%	*	Red	No comparable data available	
M16	Complaints responded to on time	Council	Bigger is better	Monthly	75%	Jan 2024	49%	42%	1	Red	No comparable data available	
M17	Member Enquiries responded to on time	Council	Bigger is better	Monthly	75%	Jan 2024	43%	62%	*	Red	No comparable data available	
M18	MP enquiries responded to on time	Council	Bigger is better	Monthly	75%	Jan 2024	46%	41%	1	Red	No comparable data available	
M11a	Staff Turnover rate (FTE who have left in the past 12 months divided by the total permanent staff)	Council	Smaller is better	Monthly	N/A	Mar-23-Feb-24	12.2%	12.6%	1	N/A	2021/22 London average	12.6%
M11b	Staff Turnover rate - enforced turnover (redundancy or other forms of dismissal)	Council	N/A	Monthly	N/A	Mar-23-Feb-24	10.2%	9.8%		N/A	2021/22 London average	14.8%
M11c	Staff Turnover rate - natural turnover (staff leaving from resignation)	Council	N/A	Monthly	N/A	Mar-23-Feb-24	89.8%	90.2%		N/A	2021/22 London average	85.2%

May	or's Business Plan 2022-26 Performa	nce Indicat	ors - Outcom	e 2 - Croyd	on is a p	lace of o	pportunity	for busines	s, earning	g and lea	arning	
Ref.	Indicator	Council or partnership working	Bigger or smaller is better?	Frequency	Target	Previous value	Latest date	Latest value	Direction of travel	RAG	Benchmarking timeframe	Benchmark
M20	Proportion of 16 and 17 year olds who were not in education, employment or training (NEET)	Council	Smaller is better	Monthly	2.6%	2.4%	Dec 2023	1.3%	1	Green	Average of Dec 22, Jan 23 and Feb 23 (London position)	1.6%
M21	Number of apprenticeship schemes started across the council	Council	Bigger is better	Monthly	72	132	Nov 2023	132	-	Green	No comparable data available	
M23	% of care leavers in employment, education or training (EET) now aged 19 to 21	Council	Bigger is better	Monthly	60%	60%	Feb 2024	62%	1	Green	2022/23 (London position)	60%
M24	Major Planning applications determined in time over a rolling 2 year period	Council	Bigger is better	Monthly	60.00%	91.80%	Mar-22-Feb-24	91.94%	1	Green	24 months to end of March 2022 (London position)	90.40%
M25	Non- Major Planning applications determined in time over a rolling 2 year period	Council	Bigger is better	Monthly	70.0%	81.4%	Mar-22-Feb-24	81.4%	1	Green	24 months to end of March 2022 (London position)	87.2%
M19	% of people claiming universal credit who are in employment	Partnership	Smaller is better	Monthly	N/A	40.3%	Dec 2023	40.1%	1	N/A	November 2023 (London average)	38.5%
MZE	Croydon unemployment rate	Partnership	Smaller is better	Monthly	N/A	5.8%	Jan 2024	5.8%	1	N/A	Dec 2023 (London position)	5.0%
age	Employment rate (% of 16-64 year olds in employment)	Partnership	Bigger is better	Quarterly	N/A	74.7%	Q1 23/24	74.9%	1	N/A	2023/24 Q1 (London position)	75.1%
	Annual percentage change in weekly earnings (£) for full time employed Croydon residents.	Partnership	Bigger is better	Annual	N/A	7.1%	2023/24	1.8%	*	N/A	Difference between 2022 and 2023 (London position)	3.9%

May	or's Business Plan 2022-26 Performan	ce Indicators	- Outcome 3 - Ev	/ery child a	nd your	ng person	in Croydon	has the chan	ice to thriv	/e, learn a	and fulfil their pot	tential
Ref.	Indicator	Council or partnership working	Bigger or smaller is better?	Frequency	Target	Previous value	Latest date	Latest value	Direction of travel	RAG	Benchmarking timeframe	Benchmark
M33	Percentage of Education Health & Care Plans issued within 20 weeks (excluding exceptions)	Council	Bigger is better	Monthly	62%	48%	Feb 2024	63%	1	Green	2022 (London position)	55%
M34	Percentage of referrals to children services actioned within 2 working days	Council	Bigger is better	Monthly	80%	85%	Feb 2024	89%	1	Green	No comparable data available	
M36	Number of current child protection plans lasting 2 years of more	Council	Smaller is better	Monthly	2.8%	2.1%	Feb 2024	2.2%	*	Green	2022/23 (London position)	3.2%
M37	% of children subject to a Child Protection Plan for a second or subsequent time (ever)	Council	Smaller is better	Monthly	20%	25%	Feb 2024	25%	-	Red	2022/23 (London position)	20%
M38	Rate of local Children Looked after (CLA) per 10,000 under 18 years population	Council	Smaller is better	Monthly	49.9	46.4	Feb 2024	47.0	*	Green	2022/23 (London position)	43.9
M40	Percentage of the under 18 years population who are UASC	Council	Smaller is better	Monthly	0.11%	0.10%	Feb 2024	0.11%	*	Green	2022/23 (London position)	0.07%
M35	Rate of children in need per 10,000 of under 18 population	Council	N/A	Monthly	N/A	504	Feb 2024	522		N/A	2022/23 (London position)	370
M4D	Percentage of Care Experienced young people who were formerly UASC	Council	Not specified	Monthly	N/A	55%	Feb 2024	54%		N/A	No comparable data available	
ge	Percentage of schools rated 'good' or 'outstanding'	Partnership	Bigger is better	Monthly	N/A	94%	Jan 2024	94%	-	N/A	January 24 (London position)	96%
MOT	Permanent exclusions from schools as a percentage of the school population	Both	Smaller is better	Annual	N/A	0.03%	2021/22	0.03%	-	N/A	2021/22 Academic Year (London position)	0.04%
N28	EYFS (Early Years Foundation Stage) - Percentage of children achieving a good level of development	Partnership	Bigger is better	Annual	N/A	67.4%	2022/23	69.1%	1	N/A	2022/23 Academic Year (London position)	69.1%
M29	KS2 - Percentage of pupils achieving expected standard at KS2 in Reading, Writing and Mathematics	Partnership	Bigger is better	Annual	N/A	63%	2022/23	63%	-	N/A	2022/23 Academic Year (London position)	67%
M30	KS4 - Average Progress 8 score per pupil	Partnership	Bigger is better	Annual	N/A	-0.02	2022/23	0.01	1	N/A	2022/23 Academic Year (London position)	0.27
M31	KS4 - Percentage of pupils achieving grades 9-5 in English and Maths	Partnership	Bigger is better	Annual	N/A	48.9%	2022/23	44.9%	*	N/A	2022/23 Academic Year (London position)	54.1%
M32	KS5 - % of students achieving at least 2 substantial level 3 qualifications	Partnership	Bigger is better	Annual	N/A	89.1%	2022/23	84.3%	*	N/A	2022/23 Academic Year (London position)	92.9%
M88	Percentage of 16-18 year olds completing study who go on to Sustained education, apprenticeship or employment	Partnership	Bigger is better	Annual	N/A	94.7%	2021/22	94.3%	৵	N/A	2021/22 (London position)	94.6%

Mayo	r's Business Plan 2022-26 Performance	Indicators	- Outcome 4 - O	Croydon is a	a cleaner,	safer and he	althier place	e, a borough	to be pro	ud to cal	l home	
Ref.	Indicator	Council or partnership working	Bigger or smaller is better?	Frequency	Target	Previous value	Latest date	Latest value	Direction of travel	RAG	Benchmarking timeframe	Benchmark
M39	Number of children & young people on special educational needs & disability supported travel moving to independent travel plans (students per trainer)	Council	Bigger is better	Annual	9.5		2021/22	22.0		Green	No comparable data available	
M43	% of reported flytips removed within one working day	Council	Bigger is better	Monthly	95.0%	94.8%	Feb 2024	98.9%	1	Green	24 months to end of March 2022 (London position)	90.4%
M44	% of waste rejected as contamination by Croydon's processing facility	Council	Smaller is better	Monthly	6.00%	15.70%	Jan 2024	13.07%	1	Red	2021-22 Stat neighbour median	6.00%
M45a	Household waste recycling rate	Council	Bigger is better	Monthly	36.30%	31.95%	Jan 2024	36.27%	1	Amber	2021-22 Stat neighbour median	36.30%
M45b	Non-recycled Household Waste (kg per household)	Council	Smaller is better	Monthly	47.43	38.67	Jan 2024	37.63	1	Green	2021-22 Stat neighbour median	47.43
M46	% of street below grade rectified within 24hrs	Council	Bigger is better	Monthly	95.00%	97.19%	Feb 2024	97.46%	1	Green	No comparable data available	
M47	% of household waste collected on time	Council	Bigger is better	Monthly	95.00%	99.92%	Feb 2024	99.90%	4	Green	24 months to end of March 2022 (London position)	87.20%
<u>a</u> g	% of children receiving 6-8 week review by health visitor by the time they were 8 weeks	Council	Bigger is better	Quarterly	70.7%	60.5%	Q2 23/24	62.3%	1	Red	2023/24 Q2 (London position)	77.2%
M B U	% of children aged 2.5 who received a 2 - 2.5 year review	Council	Bigger is better	Quarterly	58.1%	42.3%	Q2 23/24	37.6%	*	Red	2023/24 Q2 (London position)	63.1%
MGD	Carbon dioxide (CO2) emissions estimates within the scope of influence of Local Authorities (Emissions per km2 (kt CO2))	Council	Smaller is better	Annual	15.9	11.3	2021	12.3	*	Green	2020 (London position)	15.9
M64	Total households in Temporary accommodation	Council	Smaller is better	Monthly	2,400	3,303	Feb 2024	3,524	*	Red	No comparable data available	
M65	Number of temporary accommodation households that are in nightly let	Council	Smaller is better	Monthly	800	1,491	Feb 2024	1,592	*	Red	No comparable data available	
M66	Number of temporary accommodation households that are in shared accommodation >6 weeks	Council	Smaller is better	Monthly	5	142	Feb 2024	150	4	Red	No comparable data available	
M67	Number of homelessness cases prevented	Council	Bigger is better	Monthly	35	13	Feb 2024	9	4	Red	No comparable data available	
M68	Number of cases where Homelessness was Relieved	Council	Bigger is better	Monthly	25	10	Feb 2024	2	*	Red	No comparable data available	
M83	% of Responsive Repairs completed within target times	Council	Bigger is better	Monthly	80.0%	86.0%	Feb 2024	90.0%	1	Green	No comparable data available	
M84	Average Void Re-let times taken (Days)	Council	Smaller is better	Monthly	40.0	93.2	Feb 2024	97.0	*	Red	No comparable data available	

May	or's Business Plan 2022-26 Performance	e Indicators	- Outcome 4 -	Croydon is	a <mark>cleaner</mark> ,	safer and he	ealthier place	e, a borough	to be pro	ud to ca	Ill home - page 2	
Ref.	Indicator	Council or partnership working	Bigger or smaller is better?	Frequency	Target	Previous value	Latest date	Latest value	Direction of travel	RAG	Benchmarking timeframe	Benchmark
M69	Number of Homeless Applications Made	Council	N/A	Monthly	N/A	485	Feb 2024	426		N/A	No comparable data available	
M82	% of non-offensive graffiti cleaned within 10 working days	Council	Bigger is better	Monthly	N/A	99%	Dec 2023	75%	*	N/A	No comparable data available	
M48	Violence with injury offences rate per 1,000 population	Partnership	Smaller is better	Monthly	N/A	9.30	Feb-23-Jan-24	9.40	*	N/A	12 months rolling to January 24 (London position)	9.00
M49	Juvenile first time entrants to the criminal justice system per 100,000 of 10-17 year olds	Partnership	Smaller is better	Monthly	N/A	244	Mar-23-Feb-24	244	-	N/A	2021 (London position)	184
M50	Knife crime with injury rolling 12 months (rate per 1,000 population)	Partnership	Smaller is better	Monthly	N/A	0.50	Feb-23-Jan-24	0.50	-	N/A	12 months rolling to January 24 (London position)	0.40
M51	Knife crime with injury (victims 1-24 years old) rolling 12 months (rate per 1,000 1-24 population)	Partnership	Smaller is better	Monthly	N/A	0.20	Feb-23-Jan-24	0.20	-	N/A	12 months rolling to January 24 (London position)	0.30
P₂age	Hate crime offences (includes Homophobic, transphobic, religious, race and disability hate crimes) rate per 1,000 population	Partnership	N/A	Monthly	N/A	2.60	Feb-23-Jan-24	2.60		N/A	12 months rolling to January 24 (London position)	3.00
₽ 54	Domestic violence offences rate per 1,000 population	Partnership	N/A	Monthly	N/A	12.80	Feb-23-Jan-24	13.10		N/A	12 months rolling to January 24 (London position)	10.70
M54	% opiates and/or crack cocaine users not in treatment	Partnership	Smaller is better	Annual	N/A	68.4%	2020/21	67.8%	1	N/A	2020/21 (London average)	64.5%
M55	% of the eligible population offered an NHS Health Check who received one (% uptake)	Partnership	Bigger is better	Quarterly	N/A	14%	Q3 23/24	53%	1	N/A	2023/24 Q3 (London position)	42%
M59	% of children aged 10-11 years (children in year 6) classified as obese or overweight	Partnership	Smaller is better	Annual	N/A	41.9%	2022/23	39.9%	1	N/A	2022/23 (London average)	38.8%
M60	% of children aged 4-5 years (children in reception) classified as obese or overweight	Partnership	Smaller is better	Annual	N/A	22.0%	2022/23	20.3%	1	N/A	2022/23 (London average)	20.0%
M62	Affordable homes completed (measured as a % of total build)	Partnership	Bigger is better	Annual	N/A	18%	2021/22	16%	*	N/A	No comparable data available	

May	or's Business Plan 2022-26 Performance	e Indicators	- Outcome 5 -	People can	lead heal	thier and ind	lependent li	ves for longe	r			
Ref.	Indicator	Council or partnership working	Bigger or smaller is better?	Frequency	Target	Previous value	Latest date	Latest value	Direction of travel	RAG	Benchmarking timeframe	Benchmark
M70	% of safeguarding intervention leading to reduction / removal of risk (closed episodes)	Council	Bigger is better	Monthly	95%	100%	Jan 2024	98%	≁	Green	No comparable data available	
M71	% of people who approach the council for help with adult care and that is resolved at the point of initial contact.	Council	Bigger is better	Monthly	75%	82%	Feb 2024	80%	*	Green	No comparable data available	
M72	% of people still at home after 91 days after returning home from using reablement service	Council	Bigger is better	Quarterly	86%	82%	Q3 23/24	89%	1	Green	FY 22-23 (London position)	86%
M73	Rate of 18-64 clients in long term care (per 100,000)	Council	Smaller is better	Monthly	708	868	Feb 2024	871	*	Red	FY 22-23 (London position)	708
M74	Rate of 65+ clients in Long term care (per 100,000)	Council	Smaller is better	Monthly	5,000	4,431	Feb 2024	4,497	≁	Green	FY 22-23 (London position)	5,000
M75	Rate of 18-64 clients supported to live independently (per 100,000)	Council	Smaller is better	Monthly	698	786	Feb 2024	791	*	Red	FY 22-23 (London position)	698
M76	Rate of 65+ clients supported to live independently (per 100,000)	Council	Smaller is better	Monthly	5,316	3,996	Feb 2024	4,009	≁	Green	FY 22-23 (London position)	5,316
M77	Rate of 18-64 people in residential and nursing care (per 100,000)	Council	Smaller is better	Monthly	99	175	Feb 2024	175	*	Red	FY 22-23 (London position)	99
MA MA	Rate of 65+ people in residential and nursing care (per 100,000)	Council	Smaller is better	Monthly	1,273	1,478	Feb 2024	1,486	*	Red	FY 22-23 (London position)	1,273
ge	% of eligible adults managing their care via direct payment	Council	Bigger is better	Monthly	25%	18%	Feb 2024	17%	♦	Red	FY 22-23 (London position)	25%
™ 10	% of long term clients in care for more than 12+ months, who have had a review in the last 12 months	Council	Bigger is better	Monthly	57%	44%	Feb 2024	45%	1	Red	FY 22-23 (London position)	58%

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APPENDIX B Mayor's Business Plan 2022-26 Performance Report February 2024

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As I complete my second year in office as Croydon's first Executive Mayor, I am proud of the progress my Administration has made. Whilst we are still on a journey of improvement, I have been relentless in my pursuit of tackling the Council's toxic financial legacy and providing the much-needed discipline, leadership and sound governance this Council lacked. We have not been subject to a S114 notice for some time and are tightly managing all parts of our budget, with Government recognising that Croydon continues to make good progress.

This quarter, I have continued to engage with key partners to continue to restore pride in our borough. Growing confidence in the borough was recognised by Howard Dawber, Deputy Mayor of London for Business, who on a recent visit identified Croydon as a 'high priority' for investment due to its 'enormous potential.' London Gatwick has also signed an Economic Growth Charter with the Council further strengthening confidence in Croydon with the airport generating over £265 million for Croydon's economy in 2023, supporting over 3,600 local jobs.

I have also continued to deliver one of my key priorities which was to restore faith in the planning system. We have revised the Local Plan, which goes out to consultation this month, removing intensification zones, protecting character, and emphasising design over density.



We remain committed to delivering new affordable homes for Croydon residents, but not at the expense of quality standards. I was delighted that we secured £53 million of Government housing grant through the GLA to rebuild Regina Road, providing safe, well-designed council homes for generations to come.

I have also been working to revitalise our district centres and the Council has now received a planning application from Polaska to build a pool and leisure centre in Purley, along with a new public square which will help regenerate Purley and boost the local economy. The second blitz clean campaign is underway in Thornton Heath, part of my ongoing commitment to making our streets and district centres cleaner.

'Listening to Croydon' residents was a key commitment in my manifesto, and I recently hosted 'Mayor's Question Time' sessions in Sanderstead and South Norwood and I will continue to host these sessions across the borough. I am immensely proud of our year as the London Borough of Culture, and the excellent exhibitions at Museum of Croydon: REWIND: This is Croydon's Music, Routes to Roots and Little Manhattan which provided an opportunity to celebrate our unique identity, communities, rich heritage, and creativity.



I have proudly overseen investment in our green and open spaces, recently opening a further two new playgrounds as part of the Playground Investment Programme, collaborating with local communities to create environments where our young children can thrive.

We have come a long way in the last two years to bring meaningful change to Croydon. We still have a long journey ahead, but I am determined to not only restore pride in Croydon but also restore confidence in Croydon, so that we may build a brighter future together.

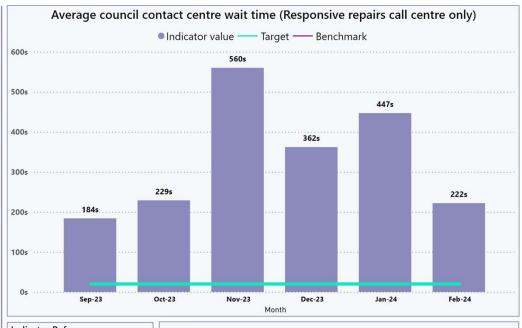
1. The Council balances its books, listens To residents and delivers good sustainable services









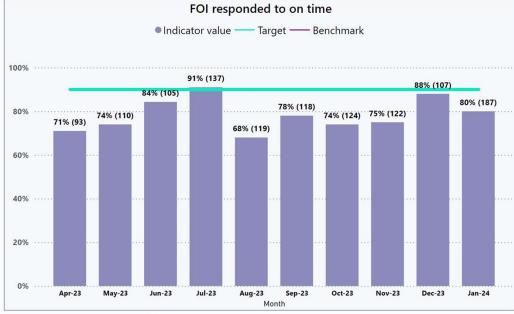


Indicator Ref. M10a Outcome 1 Our performance has improved in February. The call volume has decreased slightly but is still higher than expected. We completed our recruitment process in February and have offered permanent roles to advisors and we expect them to join towards the end of March. The new team will undertake comprehensive training and induction, and we anticipate them commencing call handling duties from the end of April 2024. Directorate Housing Benchmarking timeframe No comparable data available





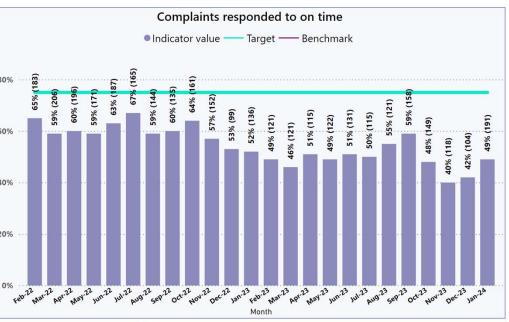
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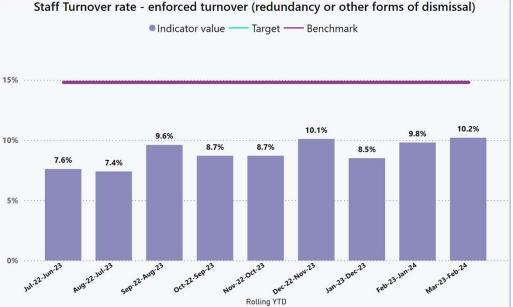
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Indicator Ref. Comment M16 Our latest performance for January shows that 49% of complaints were responded to on Outcome 1 time. Whilst this is an improvement on the previous 2 months, it is still short of our 75% target. Improvement plans are being developed by service teams working with the The Council Balances its books, corporate complaints team in order to improve response times. listens to residents and delivers good sustainable services Directorate All directorates RAG status - Red Benchmarking timeframe No comparable data available



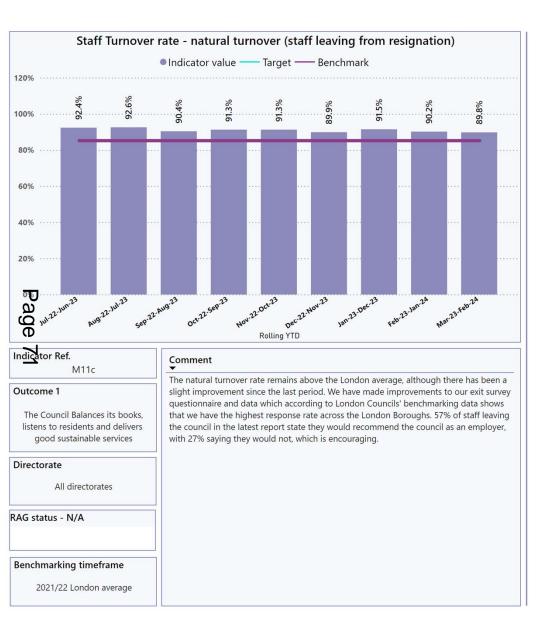




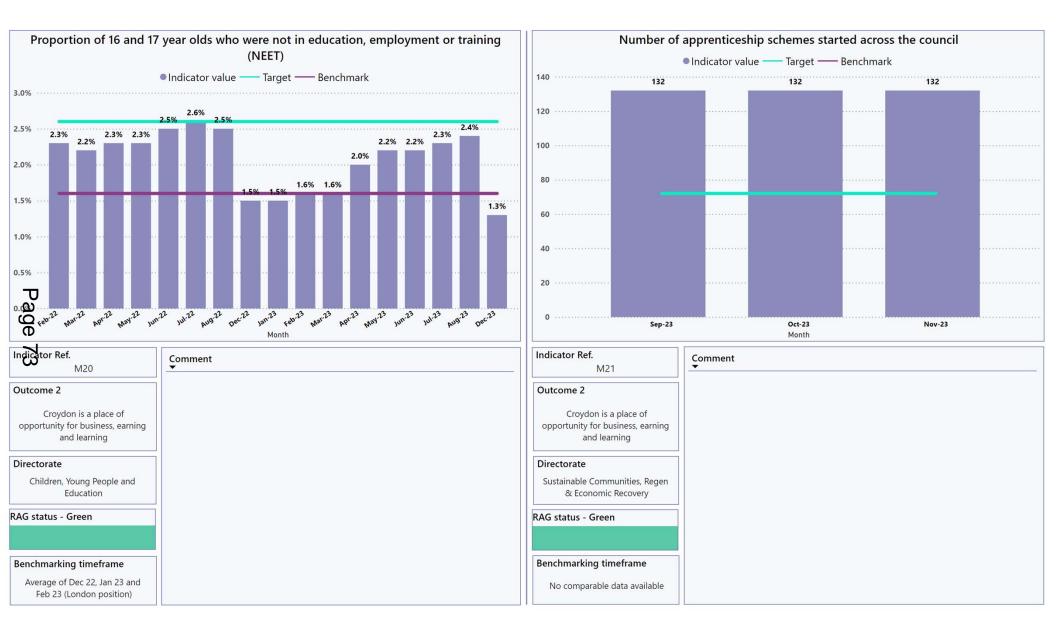
Indicator Ref. M11b The Council Balances its books, listens to residents and delivers good sustainable services All directorates RAG status - N/A Benchmarking timeframe 2021/22 London average

Comment

Whilst the enforced turnover rate is showing a slight increase since the last period, it remains lower than the London average position. We continue to monitor workforce turnover closely, providing monthly dashboards tracking enforced and natural turnover rates for each DMT, as well as guarterly dashboards for Workforce ICB with data analysis and recommendations for addressing turnover. In line with council policy, we take actions to mitigate against compulsory redundancy, looking to redeploy staff at risk of redundancy where possible, and prioritising redeployees for recruitment opportunities. We continue to monitor workforce turnover closely, providing monthly dashboards tracking enforced and natural turnover rates for each DMT, as well as quarterly dashboards for Workforce ICB with data analysis and recommendations for addressing turnover. We continue to monitor workforce turnover closely, providing monthly dashboards tracking enforced and natural turnover rates for each DMT, as well as guarterly dashboards for Workforce ICB with data analysis and recommendations for addressing turnover. Additionally, we have renewed and reviewed our exit surveys, which has resulted in a significant increase is responses from 15% to 30%, which benchmarks as the highest response rate for the London Boroughs. The last exit survey data shows that the majority of leavers would recommend the council as a place to work at 59%, which is encouraging. Exit survey data is being produced for DMT's to ensure specific focus and actions can be taken at line management level based on the emergent trends.



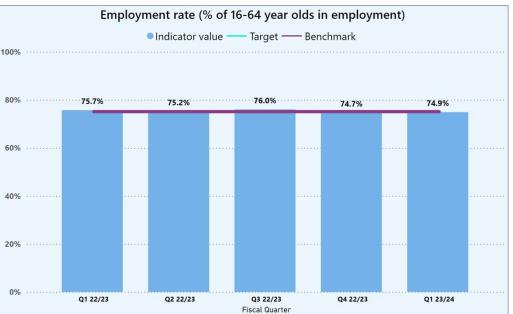
2. Croydon is a place of opportunity for business, earning and learning



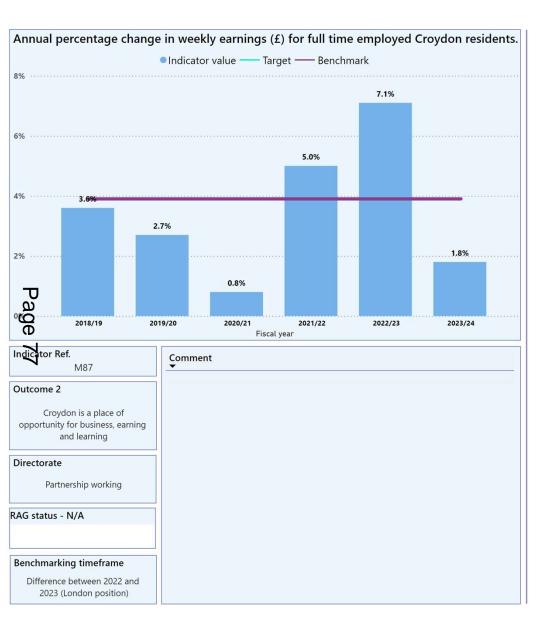




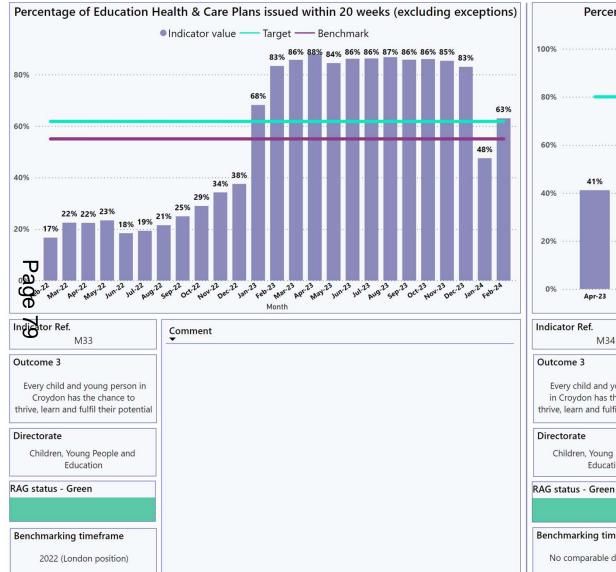


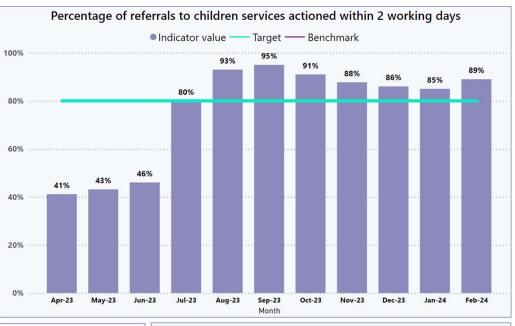


Indicator Ref. M86	Comment
10186	
Outcome 2	
Croydon is a place of	
opportunity for business, earning and learning	
and learning	
Directorate	
Partnership working	
RAG status - N/A	
Ad status - N/A	
Benchmarking timeframe	
2023/24 Q1 (London position)	
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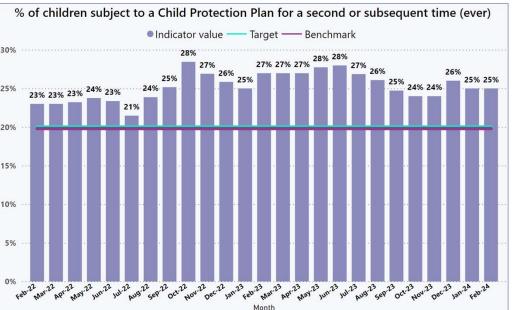
3. Every child and young person in Croydon has the chance to thrive, learn and fulfil their potential





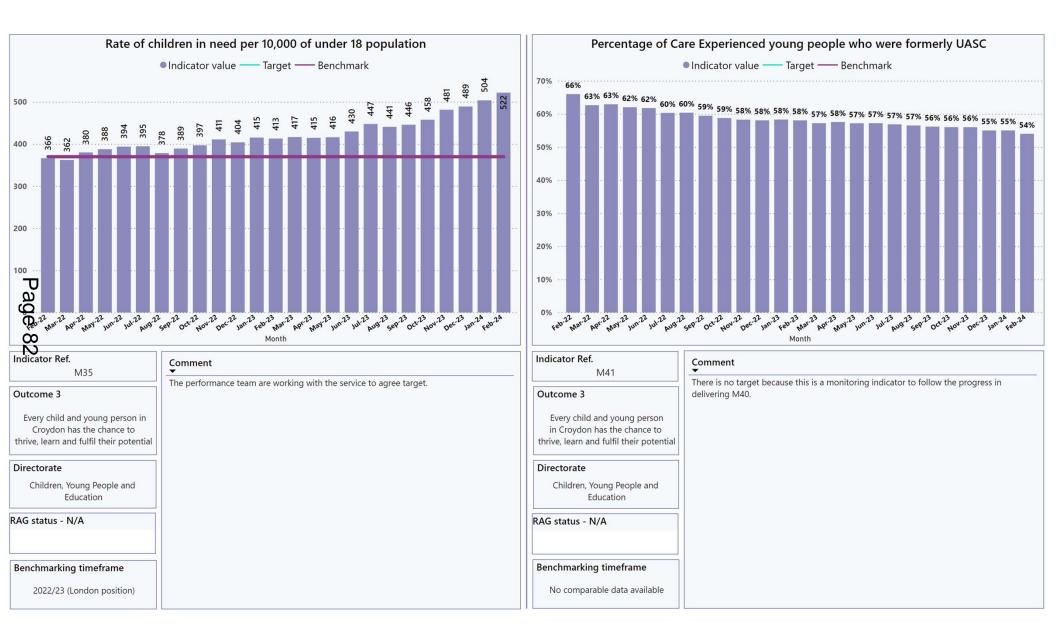






Whilst there has been an improvement plan in place, Head of Service oversight of all children who become subject of a child protection (CP) plan for a second or subsequent plan and an audit of all children subject of a CP plan including this cohort, performance in this area has remained broadly the same since autumn 2023 and is not improving at the pace required. A detailed data analysis is being completed by the Children's Social Care Performance and Improvement Consultant to identify themes and patterns to assist in making more rapid progress in this area through a targeted action plan.







Permanent exclusions from schools as a percentage of the school population

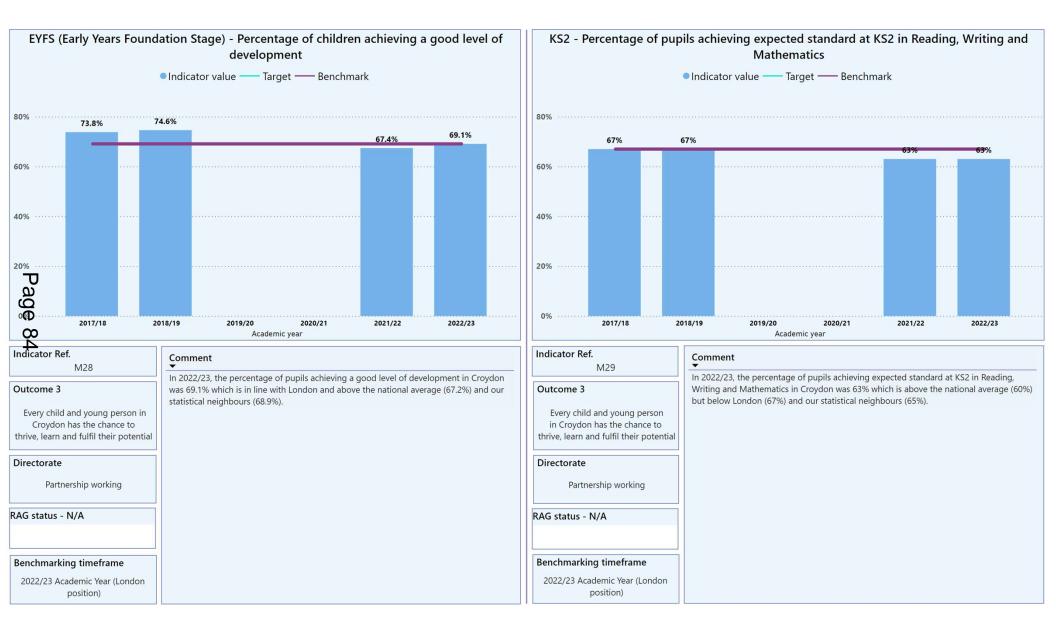
0.03%

2020/21

0.03%

2021/22

Target — Benchmark





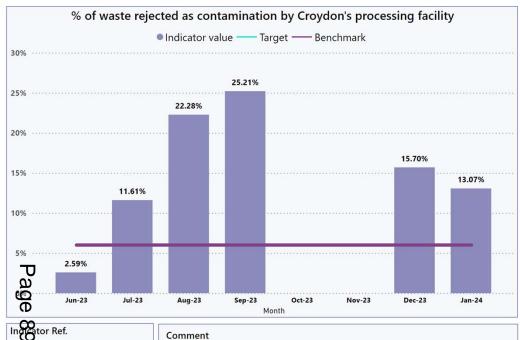


Percentage of 16-18 year olds completing study who go on to Sustained education, apprenticeship or employment



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





M44	
Outcome 4]
Croydon is a cleaner, safer and	
healthier place, a borough to be	

proud to call home

Sustainable Communities, Regen

& Economic Recovery

The Councils recycling processing facilities continue to require high quality dry mix recycling and segregated Paper and Card as such they are required to reject recycling material which do not conform to required tolerance levels for contamination. All material which contains non recycling items are being rejected and redirected for further processing at our ERF facility. As such this material does not contribute to our recycling performance.

In Partnership with our collection's provider Veolia the Council has identified the rounds which contain the higher level of contamination which is found in our communal collections from our Housing estates which have shared waste containers . The Council is working with the Managing Agents responsible for the Housing estates along with RELONDON to identify areas of service improvements to address the level of contamination and increase the quality of our recycling material.



The service is currently awaiting revised tonnage data. The Council has seen an

improvement in the overall recycling performance. This is due to a number of externally influencing factors. 1) - The level of contamination in our collected recycling material

from Flats has not changed , however the total recycling and refuse collected in the

borough has resulted in an increase in recycling rate. 2) the level of food waste has

increased. 3) In line with seasonal variations the current level of garden waste has

Comment

reduced this month.

Indicator Ref. M45a Outcome 4

Croydon is a cleaner, safer and healthier place, a borough to be proud to call home

Directorate

Sustainable Communities, Regen & Economic Recovery

RAG status - Amber

Benchmarking timeframe

2021-22 Stat neighbour median

RAG status - Red

Directorate

Benchmarking timeframe

2021-22 Stat neighbour median





Indicator Ref. M46	Comment
Outcome 4	
Croydon is a cleaner, safer and healthier place, a borough to be proud to call home	
Directorate Sustainable Communities, Regen & Economic Recovery	
RAG status - Green	
Benchmarking timeframe	
No comparable data available	

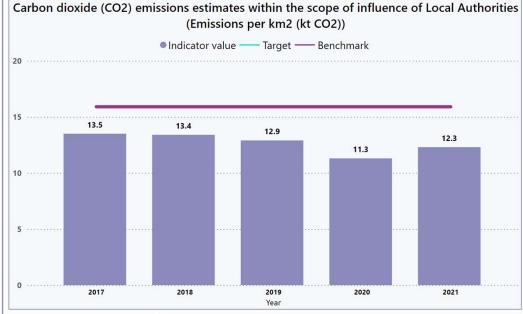




Indicator Ref. M57 Outcome 4 Croydon is a cleaner, safer and healthier place, a borough to be proud to call home Directorate Assistant Chief Executive RAG status - Red Benchmarking timeframe 2023/24 Q2 (London position)

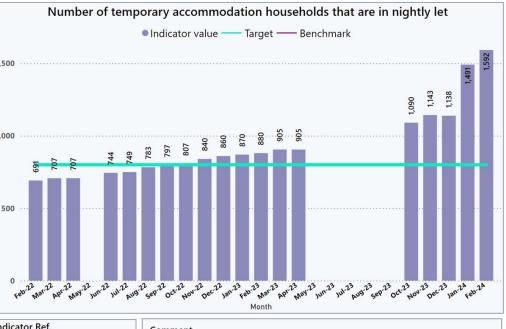
The latest (Q2 23/24) performance data shows that 62.3% of children are receiving a 6-8 review by a health visitor by the time they are 8 weeks. This is the best performance on this indicator for over 2 years, and is approaching the target of 70%. This is likely due to the prioritisation of newborn and 6-8 week checks within the service. Significant work has been undertaken collaboratively by Public Health and CYPE commissioning colleagues with the provider on improving the service delivery model and increasing workforce recruitment and retention (on the backdrop of national recruitment challenges). Robust monitoring has been established. This service was reviewed by Children's Overview and Scrutiny in February 2024.











Indicator Ref. M65	Comment
Outcome 4 Croydon is a cleaner, safer and healthier place, a borough to be proud to call home	The Council is increasingly unable to procure or even retain longer term leased temporary accommodation due to private landlords exiting the market for economic reasons. This is causing a surge in the use of nightly paid accommodation to meet homelessness statutory duty. We are working effectively with landlords and accommodation providers by responding
Directorate	quickly to investment opportunities to improve access to quality and cost-effective accommodation offers.
RAG status - Red	
Benchmarking timeframe No comparable data available	



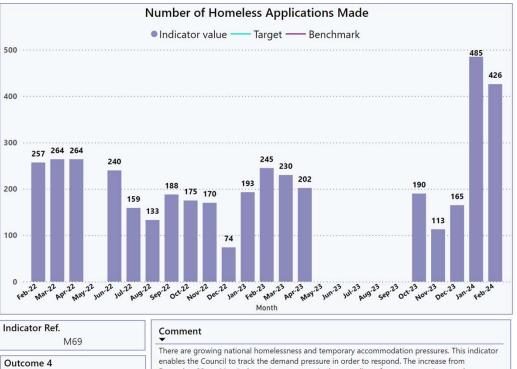


% of Responsive Repairs completed within target times Indicator value — Target — Benchmark



Indicator Ref. M83	Comment During February 2024, we have seen an improvement in the number of repairs being completed within target time. Following the recruitment of additional gas engineers at K&T Heating, their performance has also improved. We continue to work collaboratively with our contractors to support stabilisation of the service ahead of the new financial year.
Outcome 4 Croydon is a cleaner, safer and healthier place, a borough to be proud to call home	
Directorate Housing	
RAG status - Green	
Benchmarking timeframe	
No comparable data available	





Croydon is a cleaner, safer and healthier place, a borough to be

proud to call home

Housing

December 23 position is due to improvement in the recording of new presentations on the new Housing I.T system.

Directorate

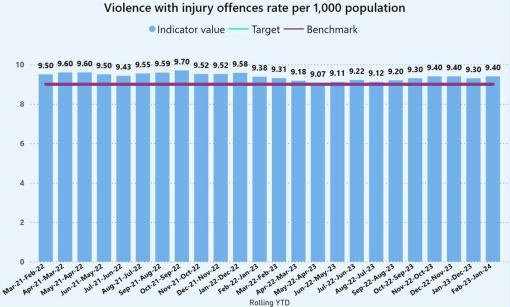
RAG status - N/A

Benchmarking timeframe

No comparable data available

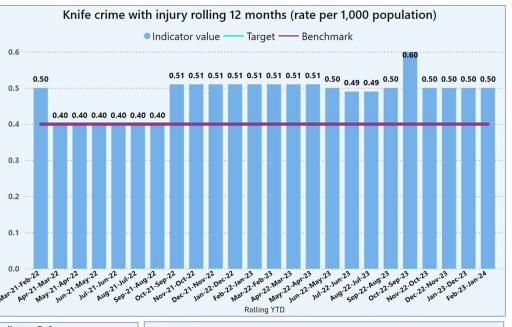


No comparable data available



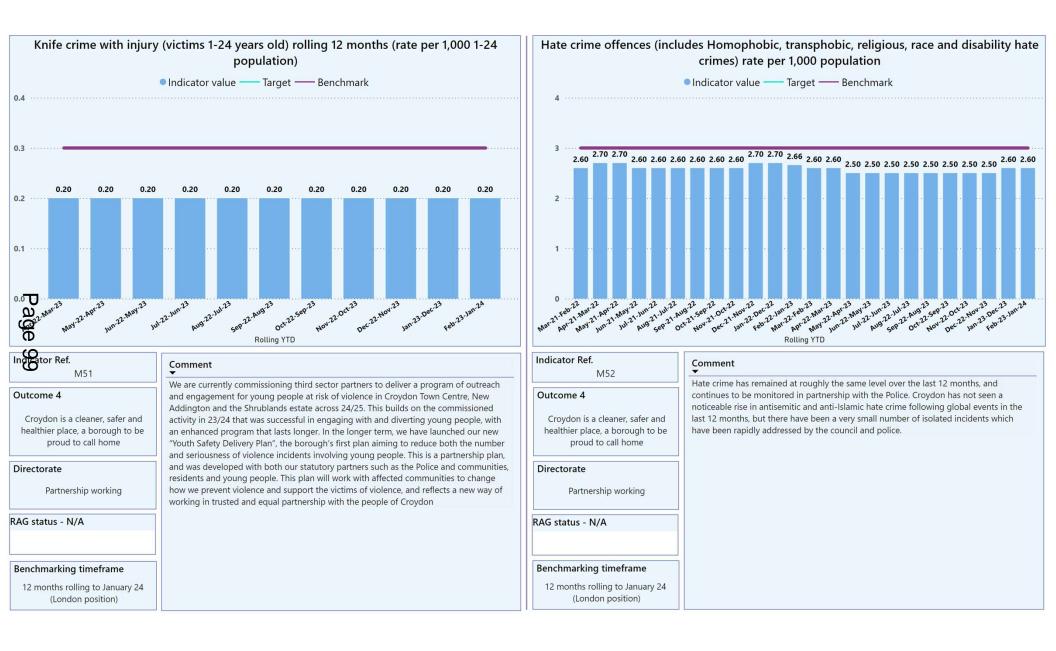
Indicator Ref. M48	Comment ▼
Outcome 4 Croydon is a cleaner, safer and healthier place, a borough to be proud to call home	We are currently commissioning third sector partners to deliver a program of outre and engagement for young people at risk of violence in Croydon Town Centre, New Addington and the Shrublands estate across 24/25. This builds on the commissione activity in 23/24 that was successful in engaging with and diverting young people, an enhanced program that lasts longer.
Directorate Partnership working	We launched our Youth Safety Delivery Plan in September 2023, and the borough's new "Tackling Violence Against Women and Girls Delivery Plan" will be launched at cabinet in Spring 2024. These two plans outline our approach to reducing two of the highest causes of violence in Croydon, and are major partnership plans to reduce violence.
RAG status - N/A	
Benchmarking timeframe	
12 months rolling to January 24 (London position)	



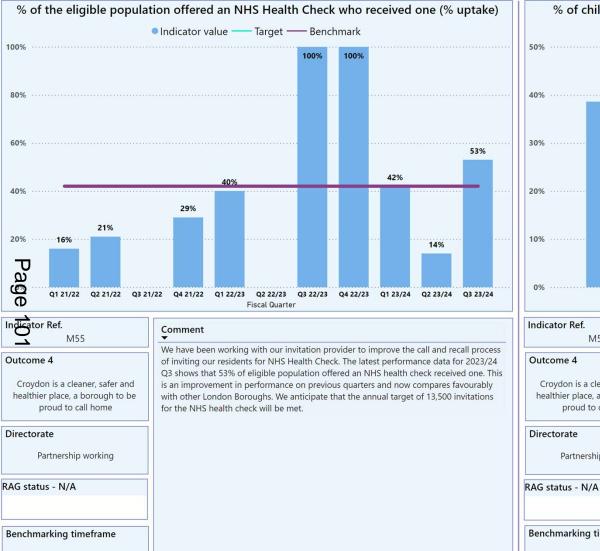


Comment M50 Croydon is a cleaner, safer and healthier place, a borough to be proud to call home Partnership working

We are currently commissioning third sector partners to deliver a program of outreach and engagement for young people at risk of violence in Croydon Town Centre, New Addington and the Shrublands estate across 24/25. This builds on the commissioned activity in 23/24 that was successful in engaging with and diverting young people, with an enhanced program that lasts longer. In the longer term, we have launched our new "Youth Safety Delivery Plan", the borough's first plan aiming to reduce both the number and seriousness of violence incidents involving young people. This is a partnership plan, and was developed with both our statutory partners such as the Police and communities, residents and young people. This plan will work with affected communities to change how we prevent violence and support the victims of violence, and reflects a new way of working in trusted and equal partnership with the people of Croydon







2023/24 Q3 (London position)

% of children aged 10-11 years (children in year 6) classified as obese or overweight

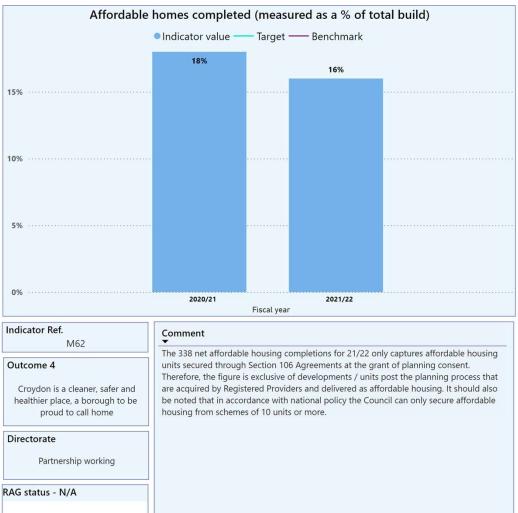
Indicator value —— Target —— Benchmark



Comment M59 The latest data for 2022/23 shows that 39.9% of children aged 10-11 are classified as obese or overweight, which is lower than the London average for 2022/23 of 40.5%. Public health is looking at opportunities to improve the offer for children under 12 in Croydon who would like support with achieving a healthy weight. The Food and Healthy Croydon is a cleaner, safer and Weight Partnership, led by Public Health, is working to support all Croydon residents to healthier place, a borough to be proud to call home achieve and maintain a healthy weight and wellbeing through equitable access to nutritious food, opportunities for physical activity, and sustainable programmes, for example through the Healthy Catering Commitment, tackling Food poverty, and a focus on Sport and Activity Opportunities. Partnership working Benchmarking timeframe

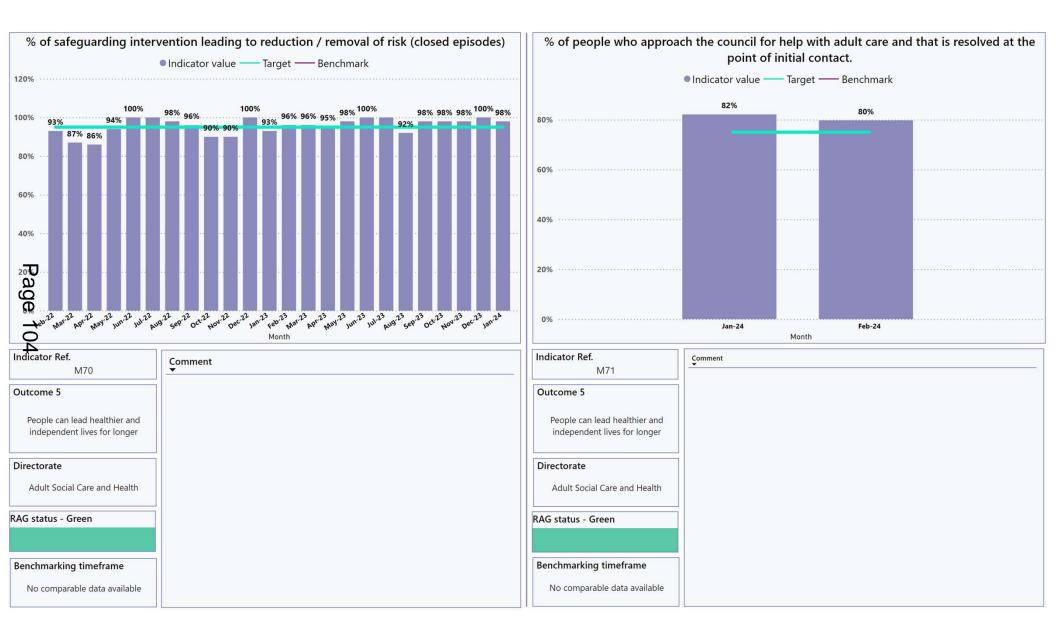
2022/23 (London average)





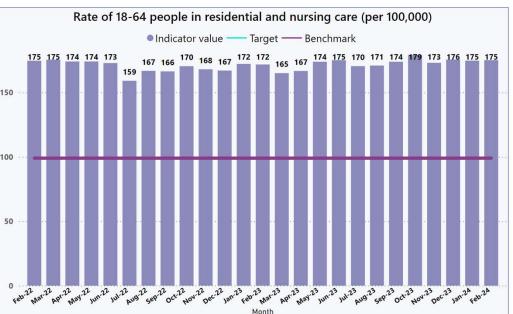
No comparable data available

5. People can lead healthier and independent lives for longer



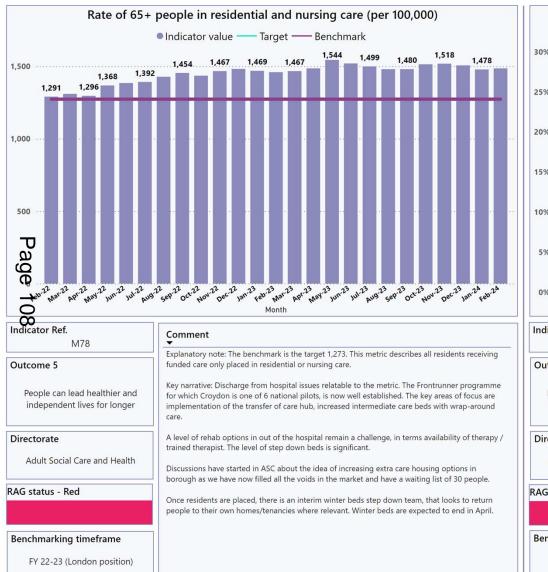


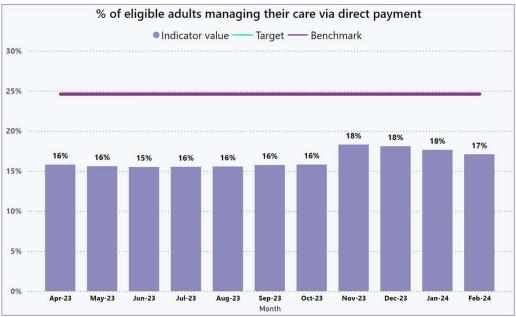




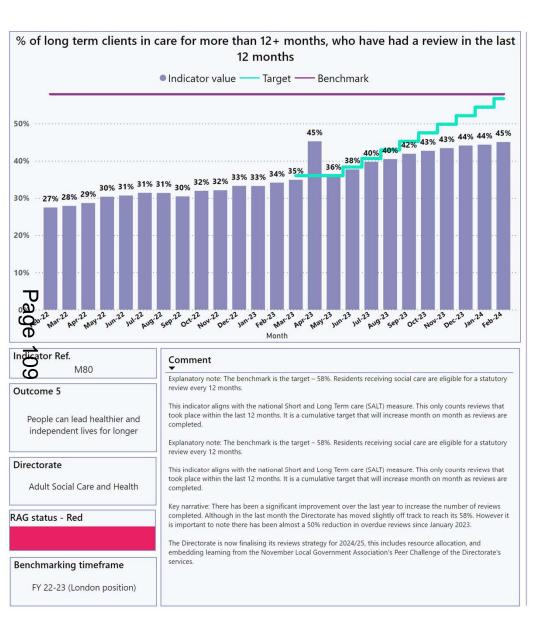
Indicator Ref. M77	Comment
Outcome 5 People can lead healthier and independent lives for longer	Explanatory note: The benchmark is the target - 99. This metric describes all residents receiving funded care only placed in residential or nursing care. Key narrative: The key focus of this metric is our managing demand approach, only placing newly assessed or reviewed residents in residential or nursing care where it is absolutely necessary. Where residents are already placed, review should always consider the opportunity for step down to extra care housing. During February - April 2024 the Directorate will complete a service review with a Strategic Delivery Partner, to set out the next stages for the long term transformation required to meet the metric.
Directorate Adult Social Care and Health RAG status - Red	
Benchmarking timeframe FY 22-23 (London position)	







Indicator Ref. M79	Comment
Outcome 5	 Explanatory note: Direct payments enable residents receiving funded social care services to have control of the services they chose to purchase to meet their needs. The benchmark is the target 24.6%, although the England average is higher at 26.2%. Key narrative: The November 23 rise of 2.5% is related to improved recording through data cleansing. A project to improve take up is in place within our managing demand programme; this
People can lead healthier and independent lives for longer	
Directorate Adult Social Care and Health	 includes information advice and guidance, how quickly Direct Payments can be set up and commissioned services.
RAG status - Red	
Benchmarking timeframe	
FY 22-23 (London position)	



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Agenda Item 8

LONDON BOROUGH OF CROYDON

REPORT:		CABINET
DATE OF DECISION		15 th May 2024
REPORT TITLE:	The	Future of The Brighton Road Experimental Orders to Support Cycle Lanes
CORPORATE DIRECTOR / DIRECTOR:		Nick Hibberd, Corporate Director of Sustainable Communities, Regeneration & Economic Recovery
LEAD OFFICER:		Karen Agbabiaka
		Director of Streets and Environment
		Abu Barkatoolah Project Manager and Report Author
LEAD MEMBER:		ncillor Scott Roche, Cabinet Member for Streets and
		Environment
KEY DECISION?	Yes	0124SAE
		REASON:
		Decision significantly impacts on communities living or
		working in an area comprising two or more Wards
CONTAINS EXEMPT INFORMATION?	NO	N/A
WARDS AFFECTED:	Wadd	on, South Croydon, Purley Oaks & Riddlesdown and Purley & Woodcote.

1. SUMMARY OF REPORT

1.1 This report provides recommendations for the future of the Experimental Traffic Orders (ETO's) relating to Brighton Road which were introduced to support cycle lanes in line with relevant statutory guidance. Brighton Rd is part of the Strategic Road Network maintained by the council. The Experimental Traffic Management Orders to support the Brighton Rd cycle scheme was introduced in April 2023 under an Experimental Traffic Order for a duration of 18 months which included a 6-month statutory process for inviting objections. The Experimental Traffic Order allowed for a period of monitoring to assess whether the scheme has worked or not. The Experimental orders allowed swift introduction of measures to capture opportunities to encourage cycling during the period of pandemic with reduced traffic volumes. The Orders encompass traffic measures to allow cycle lanes which run through the following wards from north to south: Waddon, South Croydon, Purley Oaks & Riddlesdown and Purley & Woodcote. The measures which were put in place, variously under experimental orders and in alignment with the Traffic Signs Regulations and General Directions (TSRGD) 2016 and 2020, include the following:

- Mandatory and advisory cycle lanes with light segregation (wands and defenders). It is worth noting that traffic wands/defenders are not considered to be traffic signs as prescribed by the Traffic Signs Regulations and General Directions 2016.
- No waiting at any time restrictions (under experimental traffic order) to protect the cycle lanes.
- No loading / unloading at any time restrictions along residential frontages (under experimental traffic order)
- Loading / Unloading restrictions between 10am and 3pm outside of shop frontages (under experimental traffic order)
- Short term parking bays inside roads and in bus lanes (under experimental traffic order
- New and improved zebra crossings
- Junction improvements at key locations
- 1.2 Integral to the trial period of the Experimental Traffic Orders, technical reviews were undertaken by the council as well as appointed Consultants WSP and Arcadis. The detailed outcome of the technical review is included in Annex 2 of this report, and this has informed the recommendations within this report. Below is a summary of key problems which have been identified with the usage of the light segregation (use of wands and defenders) leading to a recommendation for their removal.
 - i. Road safety problems for both cyclists and motorists
 - ii. Emergency services experiencing difficulties and delays in responding.
 - iii. Maintenance issues, cycle lane cannot be mechanically swept resulting in debris and blocked gulleys.
 - iv. Residents living along Brighton are prohibited from getting deliveries at all times.
- 1.3 The outcome of the statutory consultation process and responses received is set out in Appendix A annex 1 in full and the analysis of the responses is detailed in paragraph 5.
- 1.4 The Experimental Traffic Orders which came into force on 3rd April 2023 for a period of 18 months and will expire on 2nd October 2024. The 18-month period allowed for 6 months objection period from the start of the Experimental Traffic Order operational date. This provided an opportunity for residents who may be directly or indirectly affected or others who had concerns about the operation of the experimental orders, to make representations to the council.
- 1.5 From 2016 the Department for Transport removed the requirement for mandatory cycle lanes to be introduced under a Traffic Management Order. To prevent parking in mandatory cycle lanes double yellow lines are introduced instead (no waiting at any time restrictions). In accordance with the Highway code drivers must not continuously drive in mandatory cycle lanes thus increasing the risk of collisions with cyclists. This applies to advisory cycle lanes as well unless it is unavoidable. For example, when emergency service vehicles are responding to calls on blue light running general traffic are allowed to move to one side even if it means driving into a mandatory cycle lane for a short stretch or duration. Delaying emergency service vehicles responses can be life threatening.

2.0 RECOMMENDATIONS

For the reasons set out in the report, and having due regard to 1) the outcome of the statutory consultation, 2) technical assessments, 3) the equalities considerations as set out in Appendix B, 4) section 122 Road Traffic Act 1984 and 5) the reasons for recommendations as set out primarily in paragraph 3, the Executive Mayor in Cabinet, is recommended to:

2.1 Make the following Experimental Orders (as listed in Annex 2) permanent:

i) THE CROYDON (TRAFFIC MOVEMENT) (NO.22) Experimental ORDER 2023-Brighton Rd cycle scheme changes to bus lane restrictions (Order Ref 2023/40)

ii) The Croydon (Prohibition and Restriction of Stopping, Loading and Waiting) and (Free Parking Places) (No.4) Experimental Order 2023 – Brighton Rd cycle scheme changes to waiting & loading restrictions (Order ref 2023/41)

 iii) The Croydon (On-Street Charged-For Parking Places) (No.4) Experimental Order 2023 – Brighton Rd cycle scheme changes to parking bays (Order Ref 2023/42)

- 2.2 For the reasons set out at paragraph 3.3 agree to the removal of all light segregation (wands and defenders) along the cycle lanes given the issues identified from the technical review as detailed more fully at Appendix 1 annex 2.
- 2.3 Note that officers will separately be undertaking a review of parking places in roads adjoining Brighton Road and junctions which adjoin the Brighton Road to assess whether additional measures might be required to ease congestion and traffic progression in those roads and through those junctions, following on from concerns raised in relation to the impact of the operation of the various Experimental Orders (listed at 2.1) on adjoining roads and junctions. The review will include making adjustments to existing parking places and introducing new ones, additionally specific junctions have been identified for inclusion in the review. (See Appendix A annex 4 for more details)
- 2.4 Note that if it is necessary, following this review in 2.3, to seek additional traffic management measures, these will be addressed either under existing delegated authority of the Corporate Director Sustainable Communities, Regeneration and Economic Recovery or brought forward for further consideration by the Executive Mayor or Executive Mayor in Cabinet as appropriate.

3. REASONS FOR RECOMMENDATIONS

3.1 The experimental orders were introduced to test whether or not the proposed measures along the Brighton Road corridor, which included a widened cycle lane would be effective in enhancing road safety for all road users and to improve conditions and infrastructure for cycling in Brighton Road, which has been identified as one of the corridors with the highest potential for cycling in Croydon. The changes were

introduced experimentally so that their effectiveness could be assessed before any decision is made to make them permanent.

- 3.2 In summary, the reasons for the recommendations are.
 - a. The light segregation has proved problematic, and it is therefore officers' recommendation that this needs to be removed. (see Appendix A annex 2)
 - b. The technical review has identified positive benefits (see Appendix A annex 2) in road safety terms associated with the removal of the light segregation.
- 3.3 Summary of problems with the light segregation:
 - The Emergency services have confirmed in writing they are experiencing problems along this main road on blue light running relating to being delayed by vehicles not being able to move to the kerbside.
 - Any damaged defenders are creating trip hazards and potential obstruction to all road users and increase the risk of injuries.
 - The current light segregation cannot be mechanically swept, and debris left in the cycle lanes create a hazard for cyclists. Additional, debris by the kerb side has caused blocked road gullies which cause localised flooding and degrade the usability of the cycle lanes and create a further hazard for cyclists.
 - In relation to the light segregation a total of 1426 separate reasons were raised as part of the 458 objections received for the experimental scheme during the statutory process. (one objection can include many reasons). A total of 490 reasons (34%) stated were about the light segregation being a hindrance. The other 936 reasons stated relate to other objections. A detailed analysis is included in Appendix A annex 1.
- 3.4 There have been some material benefits from the Experimental Orders being in place to facilitate cycling, and these are:
 - The widened cycle lanes (as supported by the experimental traffic orders) provide a safer area on the main road for cyclists as per the Department for Transport guidance (Local Note 1/20). The technical review has identified a reduction in vehicular speeds across the 12-hour period (from 7am to 7pm) where speeds are below the 30mph speed limit. Lower speeds on a main road can encourage more people to cycle and also create a less intimidating environment for pedestrians.
 - A Road Safety Audit dated 16th April 2024 (see Appendix A annex 3) has not raised any concerns in relation to the widened mandatory / advisory cycle lanes which have been in place for 15 months to date which are supported by the experimental traffic orders as mentioned in this report.

3.5 Matters to Consider when Deciding to Make an ETO permanent.

3.5.1 The Road Traffic Regulation Act 1984 (RTRA) and the Local Authorities' Traffic Orders (Procedure) (England and Wales) Regulations 1996 (LATOPR 1996) establish the procedures for making a traffic regulation order, (including an Experimental Traffic Regulation Order)

- 3.5.2 Regulation 23 of the Local Authority Traffic Order which governs making an experimental order permanent, provides that the Council is able to rely on the truncated process for approval of an experimental order being made permanent provided that the requirements of Regulation 23(3) are met.
- 3.5.3 For these purposes, highways officers confirm that the above requirements have been met, the recommendation in the report is therefore to make the Experimental Orders Permanent in compliance with Regulation 23.
- 3.5.4 In exercising its powers under the Act, the Council is required (by virtue of Section 122 of the Road Traffic Regulation Act 1984) to secure the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians) and the provision of suitable and adequate parking facilities on and off street, whilst at the same time having regard to the following considerations:
 - The desirability of securing and maintaining reasonable access to premises.
 - The effect on the amenities of any locality affected.
 - Air quality.
 - Facilitating the passage of public service vehicles and securing the safety and convenience of persons using them; and
 - Any other matters appearing to the Council to be relevant.
- 3.5.5 For proper consideration of the above matters, the decision-maker is required to: have in mind the section 122(1) duty as set out above; then have regard to factors which may point in favour of imposing a restriction on movement of traffic and pedestrians (including all the factors in section 1); and finally balance the various considerations and come to the appropriate decision.
- 3.5.6 In balancing the considerations above, it is considered that the proposed changes to bus lane restrictions as per the ETO Order Ref 2023/40 should proceed, on the basis of the following key factors: The Statement of Reasons provides that "the Order introduces experimental bus lane changes in Brighton Road between Haling Road and Baines Close, as part of a scheme to facilitate mandatory cycle lanes on either side of Brighton Road. The bus lanes will allow use by pedal cycles as well as taxis and buses and will operate 7am-7pm, Mon-Fri on the west side, and 7-10am and 3-7pm, Mon-Fri on the east side. The Order is intended to improve conditions and infrastructure for cycling in Brighton Road, which has been identified as one of the corridors with the highest potential for cycling in Croydon. The changes are being introduced experimentally so that their effectiveness can be assessed before any decision is made to make them permanent."

• The current scheme has neither impacted on accessibility to public transport services nor cause any inconvenience to public transport users as bus stops accessibility has not been affected.

• By providing facilities to encourage cycling and walking, there may be some local mode shift from private vehicles, supporting a reduction in exposure to and creation of harmful emissions affecting air quality.

• Passage for public service vehicles along Brighton Road is maintained and access for users has been considered, with all existing bus stops maintained.

•The council has had no concerns raised by Transport for London insofar as delays to public transport services.

•There is a need for public service vehicles responding to emergencies to be able to access Brighton Road safely and expeditiously, and so the cycle lane still allows access for emergency vehicles both to travel along Brighton Road and to access the kerb provided that light segregation (which is not in place by virtue of traffic management orders) is removed as recommended in this report.

• The introduction of the cycle lanes facilitates improvements to the safe and convenient movement of cycle traffic.

3.5.7 In balancing the considerations above, it is considered that the proposed changes to waiting and loading restrictions and free parking places as per ETO Order ref 2023/41 should proceed, on the basis of the following key factors:

• The statement of reasons provides that "the Order introduces experimental changes to waiting and loading restrictions and loading and disabled bays in Brighton Road and in the side roads, as part of a scheme to facilitate mandatory cycle lanes on either side of Brighton Road. The changes will prevent or limit parking in the cycle lanes and provide parking and loading opportunities in the side roads. The Order is intended to improve conditions and infrastructure for cycling in Brighton Road, which has been identified as one of the corridors with the highest potential for cycling in Croydon. The changes are being introduced experimentally so that their effectiveness can be assessed before any decision is made to make them permanent."

•Provided light segregation (which is not in place by virtue of a traffic management order) is removed as recommended in this report, access, including for motorised traffic, is maintained to all residential and other properties, albeit that parking arrangements may cause some inconvenience to residents due to the introduction of cycle lanes.

• The technical assessment shows that the current experimental orders allow for servicing of local shops by allowing loading and unloading between 10am and 3pm.

• The current provision of parking bays inside roads provides for shoppers who frequent the local shops.

• By providing facilities to encourage cycling and walking, there may be some local mode shift from private vehicles, supporting a reduction in exposure to and creation of harmful emissions affecting air quality.

• The introduction of the cycle lanes facilitates improvements to the safe and convenient movement of cycle traffic.

3.5.8 In balancing the considerations above, it is considered that the proposed changes to parking bays as per the ETO Order Ref 2023/42 should proceed, on the basis of the following key factors:

The Statement of reasons provides that "the Order introduces experimental changes to parking bays in Brighton Road, as part of a scheme to facilitate mandatory cycle lanes. The changes will remove or relocate parking bays from Brighton Road into the side roads and amend existing parking in the side roads to keep the cycle lanes clear. It will also amend 2-hr payment parking in Brighton Road between Upland Road and Baines Close to operate between 10am and 3pm, Monday to Saturday. The Order is intended to improve conditions and infrastructure for cycling in Brighton Road, which has been identified as one of the corridors with the highest potential for cycling in Croydon. The changes are being introduced experimentally so that their effectiveness can be assessed before any decision is made to make them permanent."

• Provided light segregation (which is not in place by virtue of a traffic management order) is removed as recommended in this report, access, including for motorised traffic, is maintained to all residential and other properties, albeit that parking arrangements may cause some inconvenience to residents due to the introduction of cycle lanes.

• The current restrictions i.e. waiting and loading restrictions prevent the parking of vehicles in the cycle lanes which would otherwise degrade the usability of the cycle scheme.

• By providing facilities to encourage cycling and walking, there may be some local mode shift from private vehicles, supporting a reduction in exposure to and creation of harmful emissions affecting air quality

• The introduction of the cycle lanes facilitates improvements to the safe and convenient movement of cycle traffic.

• The current provision of parking bays inside roads provides for shoppers who frequent the local shops.

- 3.5.9 Finally, in determining whether or not to make a traffic management order, the Council is required, under Regulation 9 of the LATOPR to consider whether it is under a duty under regulation 9(3) to hold a public inquiry before making an order. Even where an inquiry is not mandated, the Council may still choose to hold an inquiry to consider objections before making any other order.
- 3.6 The proposals do not change any access to properties; therefore, officers consider that there is no impact in this regard. It is not considered that the implementation of the Brighton Road changes will impede on the right of individuals to respect for private and family life either in public or on private land.
- 3.7 Finally, Equalities including assessment of the Public Sector Equalities Duty are set out and detailed in section 9 and Appendix B for members' consideration.

4. ALTERNATIVE OPTIONS CONSIDERED:

- 4.1 Integral to the technical review a list of alternatives proposals was assessed to look at their viability and whether they could be recommended.
- 4.1.1 <u>**Retention of the light segregation for the cycle lanes:**</u> Whilst the Department for Transport Local Transport Note 1/20 recommends a physical form of separation between cyclists and high volumes of traffic and high speeds for a main road with a 30-mph speed limit, in light of concerns raised, it is officers' view that the light segregation could continue to cause potential problems for both motorists and cyclists Additionally,
 - damaged units could continue to be a potential hazard to road users including cyclists,
 - maintaining the cycle lane free of debris given that a mechanical sweeper cannot be used is proving very difficult.
- 4.1.2 **Removal of all cycle facilities/ lanes thus providing more road space to motorised vehicles:** The removal of the light segregation and all cycle lanes would force cyclists to join the mix of motorised traffic in both directions. Given the high volume across most parts of the day, the consequences of this option are:

- a) A high risk of conflict would exist between motorised traffic and cyclists which could lead to serious collision injuries, furthermore this would discourage cycling altogether and the connection between the Croydon Town Centre, Purley and destinations further south would be severely fragmented.
- b) Removing all cycle facilities would mean the road space would have to be reallocated to motorised traffic, hence the traffic lanes would become wider (northbound and southbound lanes could be more than 5 metres wide each way) which could lead to increasing speeds across most part of the day, increasing the perception and real road danger through placing vulnerable road users at higher risks of injury and collision.

This option would not necessarily increase journey times for vehicular traffic, which can be influenced by the following factors listed:

- the level of interruptions caused by the operation of the uncontrolled zebra crossings and signalled controlled crossings especially during peak times.
- the frequency at which vehicles enter and leave the main road via side roads.
- the number of bus stops along the route and availability of road space for overtaking
- the manner in which the road functions throughout the day, i.e. servicing requirements, illegal parking, etc.
- the density of traffic during peak and off peak which can cause a congested state at specific times.
- Interruption of flow by signal junctions
- c) Removing the cycle facilities/ lanes would compromise the council's active travel programme It could jeopardise future funding bids where active travel could play a key role in the Council accessing funding. The Council could lose future opportunities for submitting and securing bids.
- d) There is no technical rationale which could demonstrate that the removal of all cycle lanes would be of significant benefit, with this in play there is a high risk of clawback from TfL for current funding and potentially legal challenges.
- 4.1.3 Conversion all mandatory lanes to advisory lanes: Mandatory cycle lanes, with a solid lane marking, are spaces on carriageway dedicated to cyclists within the signed hours of operation (if this is limited). Advisory cycle lanes delineate an area of the carriageway that is intended for the use of cyclists and should indicate a recommended (but never required) line of travel for cyclists. They instruct other vehicles not to enter unless it is unavoidable. They are indicated by broken white line. Advisory cycle lanes by nature of their function do not provide exclusivity of road space for cyclists. Motorised traffic can legally encroach into the advisory lanes and drive very close to cyclists. This behaviour can intimidate cyclists and provide little dynamic kinetic envelope (space required for cyclist to safely manoeuvre) and in so doing increase the risk of conflict. Depending on the speed of motorised vehicles this conflict could result in serious injuries. The volume of heavy goods poses a significant risk should a conflict occur. No waiting at any time restrictions would still be required to prevent parking, if a single yellow line operating during the daytime (7am to 7pm) was introduced it would allow vehicles to park and block the cycle lanes outside of these hours, resulting in cyclists mixing with motorised traffic. The usability of the cycle lanes would be severely diminished and would discourage people from cycling. Furthermore, the council would be seen to have removed a protected exclusive lane only to replace it with a measure

which could encourage conflicts and increase the severity of collision injuries should they occur. This option would be in conflict with the council's agenda for promoting active travel and healthier lifestyle.

4.1.4 Introduction of formal parking bays along some sections of the high street on the main road: The proposal to introduce formal parking bays along certain sections of the main corridor was assessed. Given the current design of motorised vehicles, parking bays would have to be a maximum of 2.4m to ensure parked vehicles are well within the confines of the parking bay markings. The upper section of Brighton Road is geometrically constrained and cannot physically accommodate the required width for parking bays. Additionally, 1) passing traffic having to overtake a formal parking bay would require more road space and there is a high risk of head-on conflict if they straddle too far in the opposing traffic lane, 2) cyclists overtaking a parked vehicle in a 2.4m bay would require a 1 metre buffer to reduce conflict with opening of car doors. Heavy goods traffic and buses overtaking parked vehicles in formalised 2.4m bays would have encroach further into the opposing traffic lane and pose a significant risk to the safety of other road users. Additionally, with a 2.4 metre parking space the with flow traffic lane would be reduced to below 3 metres and this is considered substandard on a strategic road and would neither pass a Road Safety Audit nor the formal TFL approval process, i.e. TMAN in line with the Traffic Management Act 2004 for all Strategic Roads. There may be location (s) where it is possible to have parking bays.

4.1.5 <u>Reducing the widths of all cycle lanes to their previous widths (pre-scheme</u> widths)

The previous widths of the cycle lane varied between 1.2 and 1.5 metres along the entire length of the main road. Cyclists and pedestrians are considered vulnerable road users in the road user hierarchy and sit above any motorised traffic user within that hierarchy including motor cyclists. Whilst it is recognised that such cycle lane dimensions existed along this main road for many years including across many parts of London, it was then considered adequate as a minimum standard. There has been new guidance issued by both central government and Transport for London on design standards for cycling which supersedes previous standard. The recent design guide LTN 1/20 and the TfL London Cycling Design Standard has taken into consideration the importance of cycling as a sustainable mode of transport to tackle the challenges we all face and to promote cycling as a heathier mode of transport. In doing so the guidance has raised the design standard to ensure the safety of cyclists is not compromised given the increasing numbers across London. In view of recent design standard, reducing the lane widths will deviate from specifications aimed at improving conditions for cyclists who are considered vulnerable. The current widths and associated proposed adjustments will ensure speeds of motorised traffic are kept lower than the 30-mph speed limit which can reduce the severity of road collisions should they occur. Additionally, with a narrower cycle lane (or wider traffic lane) drivers or motorcyclists would drive closer to cyclists and could result in poor driving behaviours with risks of potential conflicts.

4.2 The above alternatives proposals were given serious considerations and were found not to be practicable on road safety terms.

5. CONSULTATION

- 5.1 Schemes introduced under an ETO invite and must allow for objections to be made for a period of 6 months from the point they come into force. Objections are permitted from anyone affected by the scheme regardless of their status. The comments received during this objection period must be considered by the Council in determining whether any changes should be made to the experiment whilst it is in force and in considering whether to proceed to a permanent TMO following the experiment.
- 5.2 To ensure that the council has captured the views of the public carefully, the council agreed to implement the measures designed to support cycling on the Brighton Rd under Experimental Traffic Orders (ETOs) from 3 April 2023 which included a 6-month objection period from the start of the ETO operational date. This provided an opportunity for residents and emergency services who may be directly or indirectly affected or others who had concerns about the operation of the experimental orders, to make representations to the council.
- 5.3 To make the process of submitting a representation as convenient as possible, the council along with the traditional method of being able to write in, also enabled receipt of objections through its 'Get Involved' web platform.

Analysis of responses received from the Experimental Order statutory process.

- i. Number of objections :458 (87% of total)
- ii. Number of other :12 (11% of total)

Whilst objections were received as part of the statutory process for the Experimental Order, we also received limited support for the experimental scheme as follows.

Number of supports =58 (11% of total)

5.4 The full analysis of responses received from the statutory consultation is included in Appendix A Annex 1.

6. CONTRIBUTION TO THE EXECUTIVE MAYOR OF CROYDON BUSINESS PLAN AND COUNCIL PRIORITIES

- 6.1 Mayor's Business Plan: The scheme falls in line with outcome 2 of Croydon Executive Mayor's Business Plan: Become a council which listens to, respects and works in partnership with Croydon's diverse communities and businesses.
- 6.2 Council Priorities: Active travel can contribute to a healthier lifestyle and decrease dependency on fossil fuel-based transport and as a result reduce the level of air pollution. Changing travel behaviour is key to ensuring the borough is greener and less polluting as increasing levels of particulate matter can have a significant impact on the health of those who are vulnerable, especially children and the elderly. The introduction of safer cycling infrastructure can assist in reducing the perception that cycling is dangerous and encourage more people to cycle for short and long trips. As we move forward to tackling climatic challenges promoting and encouraging sustainable travel behaviours are key to rise above these challenges. The Council is working towards a Sustainable Agenda and active travel can make significant inroads in contributing to this agenda.

7. FINANCIAL IMPLICATIONS

7.1 Financial Risk

- 7.1.1 The scheme improvements outlined in the Recommendations, including upgrading the mandatory cycle lanes and the removal of the wands and defenders, are likely to incur a cost between £100k-£150k. Usually these costs would be covered by the primary funder, in this case Transport for London (TfL). However, as noted above, due to the challenging timescales in preparing technical assessments and this report, there has been insufficient time to properly consult with TfL. This means that for the purposes of this report it should be assumed that Council's budgets will have to cover this cost.
- 7.1.2 There is also the potential that agreeing changes to the scheme before properly consulting with TfL will lead to the clawback of funding relating to scheme implementation, most likely via a reduction in funding for 2024/25. This would have a material impact on the delivery of a range of projects and schemes, including those in the Reconnected Croydon Levelling Up Fund programme.
- 7.1.3 In mitigation, this report sets out evidence that the light segregation has been the cause of incidents on the public highway and that the alternative proposals enhance the safety of cyclists and other road users along Brighton Road as far as practicable through creating buffer zones.
- 7.1.4 In addition, whilst there is a risk of clawback relating to some elements of the implemented scheme, it could be argued that the other components of the scheme are road safety related (raised zebra crossings, widened mandatory cycle lanes and public realm improvements) and should not be subject to any discussions regarding potential clawback.

Comments approved by Nish Narendran (Finance Manager) on behalf of the Director of Finance 27.03.2024.

8. LEGAL IMPLICATIONS

- 8.1 Variously, Section 6 -8 124 and Part IV of Schedule 9 to the Road Traffic Regulation Act 1984 (as amended) ("RTRA") provides powers to introduce, vary and implement Traffic management Orders. Sections 9-13A RTRA make provision for Experimental Traffic Orders. _
- 8.2 The Local Authorities' Traffic (Procedure) (England and Wales) Regulations 1996 (the 1996 Regulations), establish the procedures for making a traffic regulation order, including an Experimental Traffic Regulation Order. The procedural provisions giving permanent effect to an Experimental Traffic Regulation Order are set out in regulations 22 -24, Schedule 2and Schedule 5 to the 1996 Regulations. This includes details of documentation which the council must deposit and have available for public inspection as part of the process and that any person may object within the period of 6 months from the date an experimental order comes into force, to an order making the experimental order permanent. It is incumbent on the Council to take account of any objections received to making the experimental order permanent, and any representations made during the consultation stage must be reported back to, and considered by, the decision maker before a final decision is made. The Experimental

order process also provides for amendments to be made to such orders within specified parameters under Section 10 of the RTRA, but any such amendments trigger an additional 6-month consultation period from the date the amendment is published. The maximum duration of an experimental order is 18 months (save in circumstances where the Secretary of State exercises his powers to extend to allow for a public inquiry to take place).

- 8.3 Regulation 23 of the Local Authority Traffic Order which governs making an experimental order permanent, provides that the Council is able to rely on the truncated process for approval of an experimental order being made permanent provided that the requirements of Regulation 23(3) are met and the sole effect of an order ("a permanent order"), is to reproduce and continue in force indefinitely the provisions of an experimental order or of more than one such order ("a relevant experimental order"), whether or not that order has been varied or suspended under section 10(2) of the Road Traffic Regulation Act 1984.
- 8.4 Regulations 6 (consultation), 7 (notice of proposals) and 8 (objections) of the LATOPR 1996 shall not apply to a permanent order where the requirements specified in regulation 23 (3) have been complied with in relation to each relevant experimental order.
- 8.5 The regulation 23(3) requirements are that—

(a)the notice of making contained the statements specified in Schedule 5 of the LATOPR.

(b)deposited documents (including the documents referred to in sub-paragraphs (c) and (e)) were kept available for inspection in accordance with Schedule 2 of the LATOPR throughout the whole of the period specified in regulation 22(4).

(c)the deposited documents included a statement of the order making authority's reasons for making the experimental order.

(d)no variation or modification of the experimental order was made more than 12 months after the order was made; and (e)where the experimental order has been modified in accordance with section 10(2) of the RTRA, a statement of the effect of each such modification has been included with the deposited documents.

- 8.6 In determining whether or not to make a traffic management order, the Council is required, under Regulation 9 of the LATOPR to consider whether it is under a duty under regulation 9(3) to hold a public inquiry before making an order. Even where an inquiry is not mandated, the Council may still choose to hold an inquiry to consider objections before making any other order. The report details officers' consideration of these elements.
- 8.7 By virtue of section 122(1) of the Road Traffic Regulation Act 1984, the Council must exercise its powers under that Act so as to secure the expeditious, convenient and safe movement of vehicular and other traffic (including pedestrians), and the provision of suitable and adequate parking facilities on and off the highway having regard (so far as practicable) to the following matters:

(a) The desirability of securing and maintaining reasonable access to premises.

(b) The effect on the amenities of any locality affected and the importance of regulating and restricting the use of roads by heavy commercial vehicles, so as to preserve or improve the amenities of the areas through which the roads runs.

(c) The national air quality strategy.

(d) The importance of facilitating the passage of public service vehicles and of securing the safety and convenience of persons using or desiring to use such vehicles; and (e) any other matters appearing to the local authority to be relevant.

- 8.8 The Council must have proper regard to the matters set out at section122(1) and (2) and specifically document its analysis of all relevant section 122 considerations when reaching any decision. Court of Appeal (in Trail Riders Fellowship v Hampshire County Council [2019] EWCA Civ 1275 (18 July 2019)) examined the relationship between section 122 and a council's traffic management order-making powers and established that the approach should be for the decision-maker to: have in mind the section 122(1) duty; then have regard to factors which may point in favour of imposing a restriction on movement of traffic and pedestrians (including all the factors in section 1); and finally balance the various considerations and come to the appropriate decision
- 8.9 Section 16 of the Traffic Management Act 2004 imposes 'The Network Management Duty', requiring a local traffic authority to manage their road network with a view to achieving, so far as may be reasonably practicable having regard to their other obligations, policies and objectives, the following objectives:
 - a) securing the expeditious movement of traffic on the authority's road network; and
 - b) facilitating the expeditious movement of traffic on road networks for which another authority is the traffic authority.
- 8.10 The action which the authority may take in performing that duty includes, in particular, any action which they consider will contribute to securing:
 - (a) the more efficient use of their road network; or

(b) the avoidance, elimination or reduction of road congestion or other disruption to the movement of traffic on their road network or a road network for which another authority is the traffic authority.

- 8.11 Section 31 of the Traffic Management Act defines 'traffic' as including pedestrians. The Traffic Management Act 2004, Network Management Duty Guidance explains that the Network Management Duty requires the local traffic authority to consider the movement of all road users: pedestrians and cyclists, as well as motorised vehicles. It also explains that the overall aim of the "expeditious movement of traffic" implies a network that is working efficiently without unnecessary delay to those travelling on it. But the duty is also qualified in terms of practicability and other responsibilities of the authority. This means that the Duty is placed alongside all the other things that an authority has to consider, and it does not take precedence.
- 8.12 Cycle lanes are usually created from the carriageway and cycle tracks from a footway or footpath. However, cycle facilities physically separated from the main carriageway

are commonly known as and signed as cycle tracks, even if they have been created from the carriageway. Section 65 of the Highways Act 1980 empowers a local highway authority, in or by the side of a public highway, to construct a cycle track as part of the highway, and to alter or remove a cycle track constructed by them under this section.

- 8.13 Section 4 of the Cycle Tracks Act 1984 (provision of barriers in cycle tracks, etc.) empowers a highway authority to provide and maintain, in any cycle track constituting or comprised in a public highway, such barriers as they think necessary for the purpose of safeguarding persons using the cycle track; and, where a cycle track is adjacent to a public footpath or footway, provide and maintain such works as they think necessary for the purpose of separating, in the interests of safety, persons using the cycle track from those using the footpath or footway. The highway authority may alter or remove any works provided by them under section 4 of the 1984 Act.
- 8.14 The Greater London Authority Act 1999 ("GLA 1999) places a duty on each London local authority to have regard to the Mayor of London's Transport Strategy when exercising any function. This therefore includes the exercise of its Traffic Management Duty and when deciding whether to make an experimental traffic order permanent.
- 8.15 Under section 159 of the GLA 1999 Transport for London (TfL) may give financial assistance to a London local authority by way of a grant, loan or other payment, to provide safe, integrated, efficient and economic transport facilities or services to, from or within Greater London.
- 8.16 In exercising its powers under section 159, TfL may have regard to any financial assistance previously given and the use made by the authority of such assistance. TfL may also impose conditions on any financial assistance it provides, including conditions for repayment in whole or in part in specified circumstances.
- 8.17 In taking decisions and bringing forward these proposals, regard should be had to the provisions of the Human Rights Act 1998. In particular, the provisions of Article 1, of the First Protocol protection of property and Article 8, right to respect for private and family life. In relation to Article 8, right to respect for private and family life has a broad interpretation and extends to being in a public place if there is a reasonable expectation of privacy there. This right can be interfered with where lawful, necessary and proportionate to protect a number of other concerns including public safety and health. These human rights should be considered. To the extent that it is considered that they are infringed the proposals should only go ahead if it is considered that the infringement is necessary and proportionate.
- 8.18 When considering the Public Sector Equality Duty (PSED) under Section 149 of the Equality Act 2010, decision makers must evidence consideration of any potential impacts of proposals on groups who share the protected characteristics, before decisions are taken. This is detailed in Section 10 and Appendix 2.
- 8.19 Section 149 of the Act requires public bodies, in the exercise of its functions, to have due regard to the need to:

- Eliminate unlawful discrimination, harassment, victimisation and any other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a relevant protected. characteristic and those who do not.

Foster good relations between people who share a relevant protected characteristic and people who do not share it.

8.20 Approved by Sandra Herbert, Head of Litigation and Corporate Law, on behalf of the q Director of Legal Services and Monitoring Officer. (02/052024)

9. EQUALITIES IMPLICATIONS

- 9.1 An Equalities Impact Analysis has been undertaken indicating at this stage no major negative impacts on those protected characteristics (Appendix B).
- 9.2 Comments approved by Ken Orlukwu, Senior Equalities Officer, on behalf of Helen Reeves, Head of Strategy & Policy on 23 April 2024

10. APPENDICES

Appendix A

Annex 1 Analysis of objections Annex 2 Detailed technical review of the Experimental Scheme Annex 3 Road Safety Audits (to be published as a supplement agenda) Annex 4 List of junctions and parking places for review

Appendix B – Equality Impact Assessment

Appendix A

Annex 1 Analysis of objections

Extract from the consultant's report.

Fig, I show the spread of responses received across the borough.

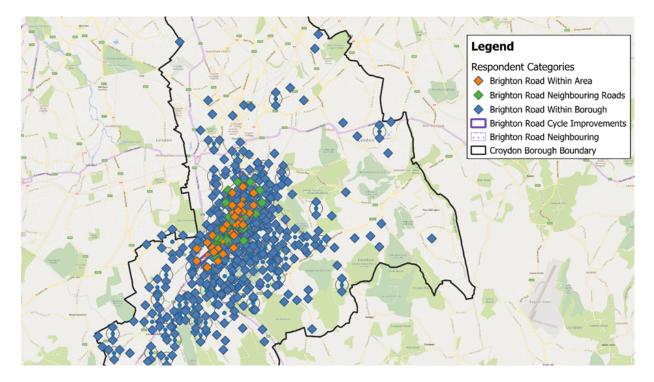
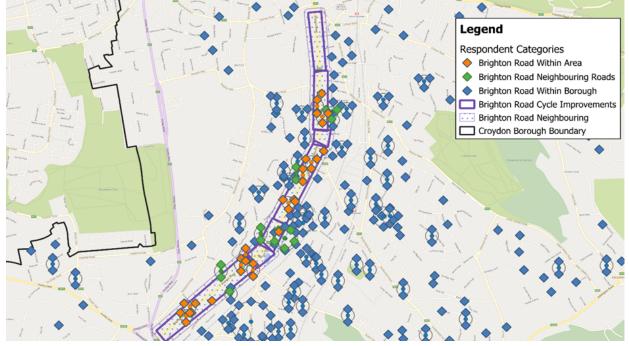


Fig 2 shows the spread of responses received within the scheme area.



Overview of the Statutory consultation: The 6 months objection period started when the experimental orders came into force on the 3^{rd of} April 2023 and ended on 3 Sept 2023 whilst the rest of the experiment continues until the expiry date of 2 October 2024. Objections are permitted from anyone affected by the scheme regardless of their status. The comments received during this objection period must be considered by the Council in determining whether any changes should be made to the experiment whilst it is in force and in considering whether to proceed to a permanent TO following the experiment. The table below outlines in detail the responses received from the following channels.

Respondent Source	Response received	Duplicate	Blank	Outside of Croydon	Total assessed
Email	3				3
Getinvolved	704	128	37	19	520
Letter	4				4
Participant	1				1
Total	712	128	37	19	528

Table 1 shows the number of responses received via different chan

Below is the percentage of responses received from the total of 528 assessed.

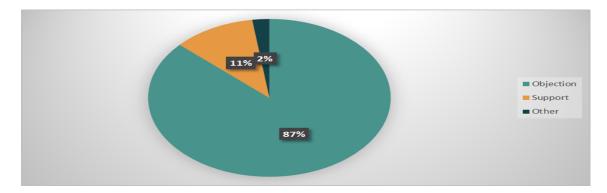


Table 2 shows responses received by location.

Respondent Area	Objection	Support	Other	Total
Within Area	29		1	30
Neighbouring Roads	12	2	1	15
Within Borough	350	51	6	407
No Location Data	67	5	4	76
Grand Total	458	58	12	528

Table 3 shows objection themes and officer comments

Su	Summmary of Objection themes and officer comments				
Def	Objection Thomas	% of	Number	Officer commonto	
	Objection Themes Traffic, congestion and infrastructure management issues (including increased traffic congestion, cycle infrastructure design/implementation issues, public transport impacts, parking impacts, road surface damage/maintenance, incorrect or poor usage of cycle lanes).	<u>total</u> 41%	Number 188	Officer comments The previous road layout before any cycle lane widening would not have provided two traffic lanes in each direction along the entire length. There is an element of vehicular traffic being contained within narrower traffic lanes than in the previous road layout, this containement helps to reduce traffic speeds and improve road safety. To date TfL has not raised any concerns about bus delays. The only junction which has been altered to reduce the approach lanes from 2 to 1 in the northbound direction only is Christchurch Rd/ Brighton Rd. Other signal junctions have retained two lanes on their approaches. The wands create a hindrance to those who need access to their properties and the cycle lanes cannot be swept by mechanical means leaving accumulation of debris.	
2	Safety and accessibility concerns (including emergency vehicle access, service vehicle access, increased loitering, noise, disturbance and crime, cycle infrastructure design issues/hazards and increased danger due to road layout/traffic flow.	33%		Currently, the light segregation hinders emergency services progression in both directions. No evidence of crime, noise and disturbance.Wands have been removed by residents so that vehicular could be gained. There is an on-going cleansing issue as the cycle lanes cannot be machanically swept and the damaged defenders are a hazard to all road users.It is considered that there is no impact on traffic flow as the main road carries large volume of traffic during the peak hours similar to other main roads in this category.	
3	Environmental and health Impacts (including pollution and emissions concerns, pedestrian movement and quality of life impediments, debris and litter accumulation.	10%	46	No evidence of increasing pollution given no assessments undertaken. In general, strategic corridors like Brighton Rd carry high volume of traffic and additioanlly can have retail frontages and other local amenities including schools which genetrate high pedestrian activities during peak hours. As indicated in the technical assessments, speed tend to drop during the peak hours and rises gradually during the off peak periods. This is true for all main corridors across the capital. Creating a safer environment is paramount for their safety . Cycle lanes cannot be mechanically swept hence the cycle lanes accumulate debris.	
4	Objections to specific aspects of scheme (such as the removal of central reservations or the implementation of extended parking prohibitions.	9%	41	Removal of central islands at some zebra crossings was necessary to acccomodate widening of cycle lanes. Zebra crossings were raised to reduce approach speeds of vehicles.	
5	Economic and resource allocation issues(including cost of changes concerns, issues with prioritisation of resources, impact on local businesses).	7%		Changes to Brighton Road were funded by TfL and formed part of the council's active travel programme. Modifications were made to introduce off peak loading / unloading at shop frontages, furthermore parking bays were also introduced on side roads to facilitate parking for shoppers.	
	Total		458		

The supportive comments were categorised into the following themes:

- a) **Safety and Security Enhancement** (including appreciation of the segregated cycle paths, positive views on the enhanced protection for cyclists, and support for initiatives that reduce car traffic).
- b) **Health and Environmental Benefits** (including the perception that the measures had encouraged healthier forms of travel, the recognition that the measures could reduce air pollution and create a healthier environment and that the measures supported environmentally friendly switches in travel modes).
- c) **Support for Active Travel and Sustainable Transportation** (such as support for the promotion of cycling and walking, a desire for an extension of such measures across the borough, and the view that the measures supported a more equitable and accessible transport system).
- d) **Approval of Infrastructure Development and Connectivity** (including the view that the measures had created infrastructure that improved the borough's connectivity, and that the measures made the borough more accessible for different modes of transport).
- e) **Economic and Social Benefits** (such as positive impacts on local businesses, and more general support for the initiative).

Table 4: Reasons for objections grouped by objection theme, one objection can have more than one reason.

Themes	Objection Sub-Category	Total
Traffic, congestion	Increased traffic congestion	246
and infrastructure management issues	Incorrect or poor usage of cycle lanes	119
	Cycle infrastructure design/implementation issues	99
	Parking impacts	43
	Public transport impacts	39
	Road surface damage/maintenance	35
Safety and	Emergency vehicle access concerns	167
Accessibility Concerns	Cycle infrastructure design issues/hazards	129
ooncerna	Increased danger due to road layout/traffic flow	54
	Safety concerns	46
	Concerns about visibility of measures	42
	Service vehicle access	38
Environmental and	Pollution and emissions concerns	59
Health Impacts	Pedestrian movement and Quality of Life impediments	34
	Debris and litter accumulation	33
	Aesthetic concerns	20
Objections to	General Objection	103
specific aspects of scheme or the scheme itself	Objections to specific aspects of scheme	26
Economic and	Cost of changes concerns	52
Resource Allocation	Issues with prioritisation of resources	31
Issues	Impact on local businesses	11
Total	· ·	1426

Within the comments about *increased traffic congestion*, there were a number of respondents who raised concerns about congestion at the Purley Oaks Recycling Centre. Examples of comments relating to this topic were:

• "There are regularly queues along the length of Brighton Road covered by this scheme.

• "Increased congestion at Purley Oaks Recycling Centre, there is now no way for cars to queue up to get in without blocking the main road."

The second most comment concern raised was related to *emergency vehicle access*. Examples of comments relating to this topic were:

- "Bollards make it impossible to get out of the way of ambulances".
- "Emergency vehicles are pushed into oncoming traffic."

Cycle infrastructure design issues/hazards was the third most common concern raised. This category included concerns about safety due to the design and layout of the scheme. Examples of comments relating to this topic were:

- "They are difficult to see and a few nights ago driving in torrential rain I was quite frightened because I knew they were there BUT COULD NOT SEE THEM."
- "The bollards and their supports are dangerous to anybody clipping one by accident."

A summary of the reasons for supporting the scheme is provided.

Themes	Objection Sub-Category	Total
Safety and Security Enhancement	Appreciation of segregated/widened cycle path(s)	22
	Enhanced Protection for Cyclists	21
	Promotion of Physical Activity	1
	Support for initiatives that reduce car traffic	6
Economic and Social	General Support	29
Benefits	Positive impacts for local businesses	1
Support for Active Travel	Advocacy for Cycling and Walking	16
and Sustainable Transportation	Desire for Extended Routes	6
	Equity in Transportation Access	1
Approval of Infrastructure Development and Connectivity	Positive Change in Travel Infrastructure	13
Health and Environmental	Environmental Consciousness	2
Benefits	Improved Air Quality	2
Total		120

Table 5: Areas of support raised.

The most common type of support was responses that offered *general support* for the scheme without identifying specific reasons. An *appreciation of segregated/widened cycle path(s)*,

support for the *enhanced protection for cyclists*, and *advocacy for cycling and walking* were the next most common reasons for supporting the scheme. Examples of supportive comments included:

- "I like the concept of dedicated bike lanes."
- "My feedback about the changes that have been made so far is VERY POSITIVE."
- "The cycle lane barriers are a great idea, offering greater reassurance to cyclists..."

Annex 2 Detailed Technical review

Existing Traffic Management Orders

Below is a list of Experimental Orders which are in place to accommodate the Cycle Scheme:

- a. THE CROYDON (TRAFFIC MOVEMENT) (NO.22) Experimental ORDER 2023-Brighton Rd cycle scheme changes to bus lane restrictions (Order Ref 2023/40)
- b. The Croydon (Prohibition and Restriction of Stopping, Loading and Waiting) and (Free Parking Places) (No.4) Experimental Order 2023 – Brighton Rd cycle scheme changes to waiting & loading restrictions (Order ref 2023/41)
- c. The Croydon (On-Street Charged-For Parking Places) (No.4) Experimental Order 2023 – Brighton Rd cycle scheme changes to parking bays (Order Ref 2023/42)

Please note there is no specific Experimental Order for the mandatory cycle lanes.

The Department for Transport changed the legislation in 2016 to remove the need for any Traffic Management Orders for mandatory cycle lanes. As such from 2016 double yellow lines "no waiting at any time" restrictions are required to be in place where mandatory cycle lanes are introduced. In general loading restrictions can vary within a section of mandatory cycle lane.

Summary of the technical review supporting the recommendations

Positive aspects of the review

- A Road Safety Audit (Ref RSA454) was carried out in 2021(see Appendix A annex 3) on a set of detailed design proposals for widened mandatory cycle lanes (between 1.8 to 2.0 metres) with no wands and defenders along the scheme length. The Road Safety Audit did not raise any safety concerns with regard to the widened mandatory / advisory cycle lanes and furthermore it did not recommend any light segregation to enhance safety of cyclists. A Road Safety Audit dated 16th April 2024 (see Appendix A annex 3) carried out for an adjusted scheme (with no wands and defenders) did not raise any road safety concerns insofar as a cycle scheme with no wands and defenders are concerned.
- The technical assessments have indicated that speed across the 12-hour period (from 7am to 7pm) ranges from 20 mph to 25 mph north of Capella Court. The speed ranges from 25-30 mph south of Capella Court where flows are lower (due to a lot of traffic diverting to Sanderstead Road) and traffic lanes are more generous. Hence demonstrating that the lower observed speeds can create a condition conducive to cycling using widened cycle lanes (or narrower traffic lanes) without any light segregation. Lower speeds increase drivers' awareness of their environment. Lower traffic speeds can contribute to lower approach speeds to zebra crossings resulting in pedestrians feeling safer to cross, reducing the risk of ""failing to stop incidents" on approaches to zebra crossings, especially in wet conditions.
- In accordance with the Department for Transport Local Transport Note 1/20 a cyclist in motion moves laterally to maintain balance especially at lower speeds and requires a space profile (dynamic kinetic envelope) of approximately 1 metre to safely cycle. The widened cycle lanes along Brighton Road are between 1.8m

to 2 metres wide and adequately wide to enhance safety for cyclists. Additionally, cyclists do not feel intimidated with passing traffic as motorised traffic tend to leave a wider passing gap with the lane in place.

- Traffic speeds along the main corridor in both directions are between 20-30 mph between 7am and 7pm and 30-35 mph between midnight and 6am. Reduction in traffic speeds can contribute to a decrease in severity of personal injury collisions should they occur and reduces the perception of road danger for all road users in particular cyclists and pedestrians.
- Observational research has indicated that Off peak loading and unloading at specific locations where shops exist are working satisfactorily, cyclists are able to overtake parked vehicles during the off-peak periods. (no formal parking bays exist at these locations, as these are not technically viable)

Problems identified:

- The emergency services have raised concerns in writing (email received on 16 January 2024) as they have significant difficulties in driving along the main road in an emergency, the light segregation prevents vehicles from relocating to the kerbside to allow them safe passage.
- The light segregation (wands and defenders) poses an increasing pressure on resources, both in terms of replacement of damaged units and sweeping the cycle lanes on a regular basis. The mechanical sweeper cannot access the cycles lanes and with limited resources it is not feasible to sweep the lanes manually. Therefore, debris collect within the lane which poses a safety risk to cyclists and reduces its usability.
- With limited resources there is no capacity to inspect the wands and defenders on a weekly basis. Monthly inspection takes place, and the wands and defenders can easily be damaged soon after any inspection regime and create a hazard for road users.
- The light segregation, particularly where they are damaged, are hazardous to road users including cyclists, there have been reported incidents to the council including personal injury incidents. The council has received 5 claims since October 2023.

Necessary adjustments to mitigate any road safety risks through the removal of the light segregation:

The removal of the light segregation will necessitate the introduction of buffer zones along the southern section south of Capella Court to the end of the scheme. The speed profile along this stretch is 25-30 mph. The buffer zones will take the form of road markings placed alongside the existing cycle lanes i.e. south of Capella Court to ensure motorised traffic especially heavy goods / buses keep a safe distance from cyclists. This is critical as the removal of the light segregation might encourage poor drivers 'behaviour through driving too close to cyclists in the absence of the light segregation. These adjustments do not require any Traffic management orders, nor do they deviate from current regulations in making ETMO permanent.

The proposed layout could achieve a similar speed profile to the northern section and in so doing achieve a consistent speed profile along the entire stretch of 20-25 mph. A consistent speed profile along the entire stretch would not necessarily impact on journey times as the latter is dependent upon many factors such as time of day, the strategic nature of the road as a thoroughfare with servicing requirements, numerous bus stops to service current bus routes, road layout constraints, number of intersections, interruptions to traffic flow by high pedestrian demand at zebra crossings and at signal controlled crossings and junctions.

Technical review of the 2022 Transport for London Guidance for the use of Traffic Wands with Cycle Infrastructure.

Paragraph 2.3 of the TfL guidance states 5 key considerations for the use of wands on the public highway and these are:

1. Safety – risk of injury or damage to persons and properties using the highway owing to the presence of the feature.

2. Access - Wands should not restrict access where it is permitted or be positioned in such a way that creates difficulty for intended users of the facilities and adjacent highway.

3.Equality- Failure to reasonably perform legal duties pertinent to the Equalities Act – does the provision of wands unreasonably impact on people with protected characteristics defined under the Equalities Act.

4. Maintenance – cost of ensuring features perform to the expected level and do not provide contribution to (1) above owing to their condition.

5. Enforcement – do the traffic wands enhance or undermine potential enforcement action.

Ref: https://content.tfl.gov.uk/guidance-for-the-use-of-traffic-wand-with cycle-infrastructure.pdf

The 5 key considerations have been assessed against current operation of the light segregation integral to the experimental scheme to have a better understanding of the impact.

Tfl Guidance key	/ considerations	
Considerations	What needs to be considered	Impact on current scheme with wands and defenders (light segragation)
Safety	Risk of injury or damage to persons and properties using the highway owing to the presence of the feature.	The light segragation has been problematic to both cyclists and motorists
Access	Wands should not restrict access where it is permitted or be positioned in such a way that creates difficulty for intended users of the facilities and adjacent highway.	Emergency services have confirmed in writing that they are having difficulties in responding to emergency calls on blue light running
Equalities	Failure to reasonably perform legal duties pertinent to the Equalities Act – does the provision of wands unreasonably impact on people with protected characteristics defined under the Equalities Act	The provision of wands creates a hindrance to all residential frontages including anyone with protected characteristics who lives on Brighton Road
Maintenance	Cost of ensuring features perform to the expected level and do not provide contribution to (1) above owing to their condition.	The damaged defenders are hazardous to all road users and continue to pose a significant road safety hazard. Furthermore the cycle lanes cannot be mechanically swept and given limited council resources it is not practicable to carry out manual sweeping on a regular basis. Consequently debris in the cycle lane poses a hazard to cyclists and reduces its usability.
Enforcement	do the traffic wands enhance or undermine potential enforcement action.	Servicing / deliveries are taking place illegally and in some cases wands are being removed by residents to gain access to frontages for ease of deliveries.

Traffic monitoring

WSP consultancy was commissioned to carry out an appraisal on the current traffic conditions along the entire length of Brighton Road corridor which is subject to the ETO's during the operation of the ETO's. The data analysed was collected using Automatic Traffic Counters (ATC's) across various sections of the main corridor to obtain a good understanding of the current traffic conditions with the cycle lane and segregation in place. The study has been carried out within the 12 months of the experimental period of 18 months and after settling down period following on from the start of the experiment. The data was collected across 7 ATC sites in May 2023 and across 3 ATC locations in February 2024 to provide a comprehensive set of data and be able to compare between May 2023 and Feb 2024.

A summary of the technical findings is outlined below. The improvements along Brighton Road starts from its junction with Bartlett Road to Purley High St just after the signal junction with Christchurch Road. Brighton Road is considered a high street with shop frontages concentrated at the top half on both sides and residential frontages and other businesses dominating the bottom half. A high street with mixed priorities and competing demands serving the local community and also those who come further afield. Therefore, there is a need to caring out a balancing act to ensure all needs are catered for and that alongside this road safety is not compromised for all those who uses this busy high street.

Technical summary: Speed surveys were carried out at 7 locations between Haling Park Road and Brantwood Road and samples of speed profiles are shown at two locations for both northbound and southbound. All other locations show similar speed profiles. It noted that Brighton Rd has a posted 30 mph speed limit.

Table 1 Brighton Road just north of Haling Park Road Northbound showing speed profile and traffic volume profile blue bar charts) across the 24-hr period

Summary of Cycle Collision monitoring

A brief study of cycle related injury collisions was carried out a) before the scheme was built, b) during construction and c) after implementation. The table below outlines the findings.

Year	Number of collisions	Slight	Serious
2018-2022 before scheme was constructed	18	12	6
2022-2023(during construction)	3	2	1
April 2023 – June 2023 (after construction)	6	5	1

A direct comparison between before and after cannot be made as the scheme has only been introduced since April 2023 and a comparison cannot be made between before data and after data for the same period, i.e. min of 3 years before and 3 years after as in industry normal practice. No conclusion can be drawn from the data. It is only a reported data set.

Table 1a Brighton Road just north of Haling Park Road Northbound showing speed profile and traffic volume profile (blue bar charts) across the 24-hr period.

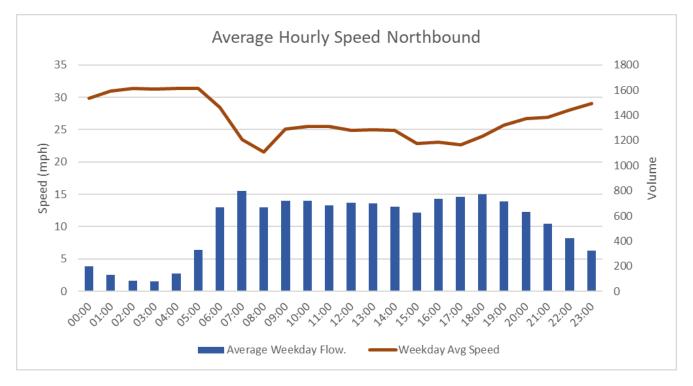


Table 1a Brighton Road just north of Haling Park Road Southbound showing speed profile and traffic volume profile (blue bar charts) across the 24-hr period.

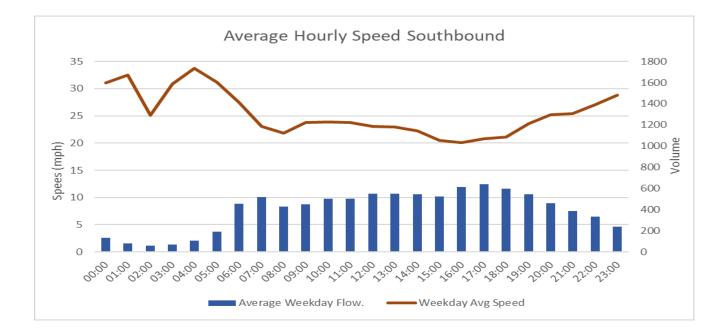


Table 2 Brighton Road just north of Purley Downs Road Northbound showing speed profile and traffic volume profile (blue bar charts) across the 24-hr period (the decrease in traffic volume is due to traffic diverting to Sanderstead Road)

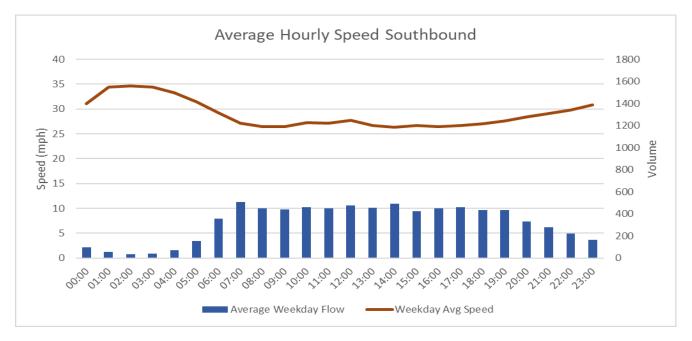
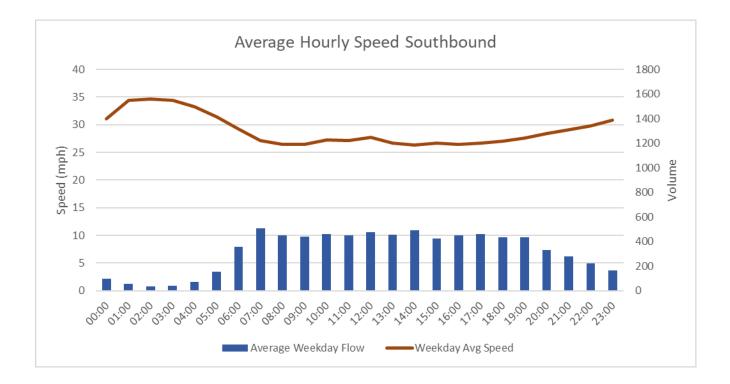


Table 2a Brighton Road just north of Purley Downs Road Southbound showing speed and volume of cycle profile (blue bar charts) across the 24-hr period (the decrease in traffic volume is due to traffic diverting to Sanderstead Road)



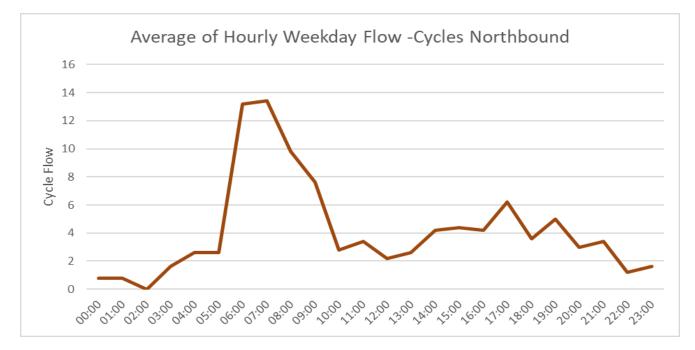
Speed summary along the corridor.

- Current peak-hour speeds when volumes along corridor are highest (07:00-08:00) average 24mph.
- North of the Capella Court gyratory, average speeds fluctuate between 20mph to 25mph throughout the day (08:00-19:00), suggesting the consistent impact of congestion and other measures in keeping speeds below the 30mph speed limit.
- South of the Capella Court gyratory –nearest Purley town centre –speeds remain closer to the 30mph speed limit.
- Speeds overnight remain at or above the 30mph speed limit along the entire corridor.

Summary of Traffic Volume analysis

- Daily flows of traffic are upwards of 12,000 per day in both directions north of Sanderstead Road, and nearly 10,000 per day south of the B269 –highlighting the strategic importance of Brighton Road in terms of people and goods movement.
- Average peak-hour flows are 800vph (vehicles per hour) in either direction north of Sanderstead Road, and 600vph in either direction south of the B269 junction.
- HGVs numbers range from 600-800 per day northbound and 400-600 per day southbound. HGVs make up 5-6% of all traffic across the corridor during the day, with this proportion rising to 10-14% overnight.
- The corridor carries 850 London Buses per day (both directions), with 25 buses per hour in each direction throughout the day (07:00-19:00).
- Daily flows for cycles average nearly 200 cycles per day in both directions.
- Directionally this includes 92 cycles per day northbound and 105 cycles per day southbound with the bulk concentrated over the day (07:00-21:00). Hourly cycle flows are low and concentrated in the peaks.
- Motorcyclists account for 400 on average in both directions per day.





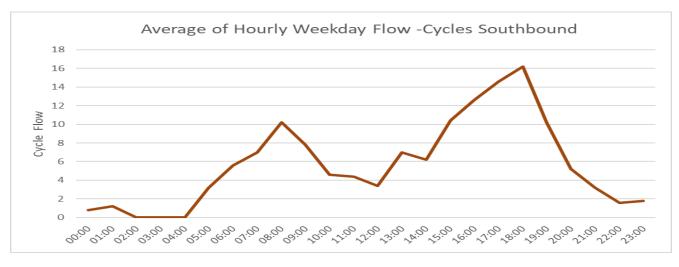


Table 3a shows a typical cycle flow profile just North of Purley Road Southbound

Observational Research

Arcadis Consulting (UK) Ltd was commissioned by the Council to undertake an operational study for the A235 Brighton Road, to observe behaviours of users of the route since the Brighton Road corridor improvements were constructed in April 2023. The locations for the research were specified by the Council and were identified to help gain an understanding of specific traffic behaviour in particular locations. The following table outlines the locations requested and the Council's reasoning behind their analysis.

Video cameras were installed at the locations on Brighton Road as outlined in table 4 of the traffic monitoring annex, to record data on Thursday 8th and Friday 9th February 2024. The footage has been used to observe pedestrian, cyclist and motor vehicle movements at the various locations as required. To represent a neutral weekday, only data from Thursday 8th February was observed. It should be highlighted that the weather was overcast/wet on the day of the survey, and that due to project timescales this was in early February.

The observations are thus caveated that they represent a snapshot in time, and observations on other days/months may bring additional insights. It is understood that the high number of camera locations has been based on various operational aspects of the scheme, the need to have a full appreciation of road user behaviour and interactions between cyclists and motor vehicles, and to justify the removal of the light segregation whilst maintaining safety for cyclists.

Table 4 outlines camera locations and the information required.

Ref	Locations	Information required
	Along southbound section of the one-way system by Capella Court, near Riddlesdown Rd junction	To observe drivers along the wide one-way section at the gyratory to see how the expanse of road space create speeding opportunities and how they use the lanes
2	Capella Court	To observe left turning movements into Riddlesdown Rd from the gyratory, vehicles turning left into Riddlesdown Rd do so at speed and sweep the large radius and observation will assist in redesign and need to improve safety of cyclists.
3	Along the southbound approach to Christchurch Road signal junction	To observe junction operation, in particular the hooking arrangements for right turning traffic in relation to ahead movements and cycle movements. Ahead movements tend to bypass right turning traffic and enter the cycle area hence risk of collision. The junction was changed from two approach lanes to one.
4	Along Southbound section towards Christchurch Road	To observe queue lengths on southbound approach to junction from a distance. Could also capture northbound movements using same camera
5	Northbound approach at Brighton Rd / Christchurch Rd junction	To observe cycles' interaction with ahead lane and from Purley approach.
6	Northbound approach	To observe lane discipline as they travel northbound away from junction of Christchurch Rd / Brighton Rd
7	Northbound approach	To observe movements approaching the recycling centre by Capella Court and level of congestion if any. Concerns were raised about the congestion that the cycle lanes have caused to this movement.
8	Northbound approach	To observe behaviour at zebra crossings in the vicinity of Capella Court and entrance to the recycling centre
9	Northbound from Biddulph Rd from number 570 Brighton Rd	To observe user behaviours during off peak loading arrangements and look at how cyclists navigate around parked cars
10	Outside number 488 Brighton Rd	To observe user behaviours at this zebra crossing
		To observe user behaviours at zebra crossing outside Toby Carvery
12	Northbound approach by Shell Petrol station by Churchill Rd	To observe behaviours at zebra crossing, centre islands were removed when the cycle lanes were designed and built hence we have received complaints, the increase in perceived road danger and cars failing to stop for pedestrians.
13	From Crunden Rd northbound	To observe behaviours at zebra by Mansfield Rd
14	Newark Rd	To observe at zebra crossing by Newark Rd
	Haling Park Rd	To observe at zebra crossing by Haling Park Rd
16	Newark Churchill Rd	Between The Studio and No 305-309 where we have off peak loading between 10am and 3pm southbound lane, vehicles park in the cycle lane and buses having to overtake and cross the opposing traffic lane as they head south. We need to have evidence of such behaviours.

The high-level findings of the analysis are presented below.

Location Zebra crossings along the corridor Riddlesdown Road junction	Summary In general, on the approach to the identified zebra crossings along the corridor, late braking vehicles or vehicles failing to stop for pedestrians has been identified. Pedestrians repeatedly had to wait for vehicles to stop when standing at a number of crossing points. Visual observations from video footage demonstrates that vehicles are keeping to the inside of the upstream southbound section of Brighton Road, which gives left turning vehicles a wider turning circle into Riddlesdown Road and appears to allow them to maintain a higher speed during the turning movement. Blocking back from the right-turn give-way onto Brighton Road northbound impacts the Riddlesdown Road junction on select occasions in both AM and PM peak periods.
Southbound lane at Capella Court	The southbound lane on the Capella Court gyratory features speeding and subsequently severe braking events, most likely due to the width of the lane.
Northbound at Capella Court / Recycle Centre	A general issue of poor lane usage has been identified, including vehicles queueing two abreast when waiting to turn right onto Brighton Road southbound or swerving through the nearside lane designated for vehicles travelling ahead into the recycling centre.
Christchurch Road junction	It may be common for vehicles at this junction to encroach into the cycle lane when passing right turning traffic. There were no observations made of vehicles encroaching into the cycle lane when a cyclist was present. Congestion often forms when buses and Ordinary Goods Vehicles turn right due to their large turning circle.
Loading bays near Biddulph Road	It was observed during video analysis in the off-peak period, that it was common for vehicles to park for a short amount of time in the cycle lane. This caused a handful of cyclists to move out into the carriageway. A number of vehicles, including buses, were observed to be encroaching across the carriageway centre line into the southbound lane. Some vehicles were doing so due to parked cars in the cycle lane. This was particularly prevalent when drivers/passengers of parked cars opened car doors into the carriageway, forcing arriving northbound vehicles to make evasive manoeuvres and use additional carriageway width to continue northbound along Brighton Road. Whilst loading restrictions are in place outside shops just north of Biddulph Road, cars were observed to be stopping within the cycle lane in both AM and PM peak periods. More vehicles were observed to be stopping in the PM peak, meaning cyclists are forced into the carriageway at a time of increased traffic flow.

Appendix A annex 3

Road Safety Audits reports

Table 5 list of junctions for review

Ref	Junctions
1	Brighton Rd junction with Haling Park Rd (issue right turners into Haling Park Rd being blocked)
2	Brighton Rd junction with Sanderstead Rd (review current keep clear and investigate a box junction
3	The one-way system along the Capella Court Gyratory leading to the junction with Riddlesdown Road,
5	Brighton Rd and Christchurch Rd signal junction review improve traffic flow.
6	Brighton Rd junction with Whytecliffe Rd opposite Purley War Memorial Hospital (issue include queuing traffic in between stop lines and potential review for a box junction

Parking Places: Introduce 15 new permanent parking places (subject to detailed design) on side roads as per the table below. The operation of these bays will be free of charge to park for the first hour and pay for the second, maximum stay is 2 hours.

Table 6: list of new parking places

Side Roads	Number of parking bays
Biddulph Rd	2
Biddulph Rd	2
Churchill Rd	2
Churchill Rd	2
Napier Rd	2
Crunden Rd	5
Total	15

Footway parking :25 metres of parking places on Brighton Rd between Biddulph Rd and number 560 Brighton Rd under permanent traffic orders to accommodate retail servicing. Parking spaces to be placed across both footway and the carriageway (footway parking style) The operation of these bays will be free of charge to park for the first hour and pay for the second, maximum stay is 2 hours.

Relaxation of loading and unloading restrictions to allow for servicing between 10am - 4pm along all residential frontages and outside of shop frontages.

Review the parking places in Allenby Avenue to ease congestion at its junction with Brighton Rd

Equality Analysis Form



Introduction 1.

1.1 **Purpose of Equality Analysis**

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

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

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

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

- Policies, strategies and plans. •
- Projects and programmes.
- Page Commissioning (including re-commissioning and de-commissioning).
 - Service review.
- Budget allocation/analysis. 4
- Staff restructures (including outsourcing). Ô ٠
 - Business transformation programmes. •
 - Organisational change programmes. ٠
 - Processes (for example thresholds, eligibility, entitlements, and access criteria. ٠

2. **Proposed change**

Directorate	Communities, Regeneration and Economic Recovery
Title of proposed change	The Future of the Brighton Rd Experimental Cycle Scheme
Name of Officer carrying out Equality Analysis	Abu Barkatoolah

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

Briefly summarise the proposed change and why it is being considered/anticipated outcomes. What is meant to achieve and how is it seeking to achieve this? Please also state if it is an amendment to an existing arrangement or a new proposal.

The Experimental Traffic Management Orders to support the Brighton Rd cycle scheme was introduced in April 2023 under an Experimental Traffic Order for a duration of 18 months which included a 6-month statutory process for inviting objections. The Experimental Traffic Order allowed for a period of monitoring to assess whether the scheme has worked or not. The scheme consists of a mandatory cycle lane (solid white line), parking and loading restrictions at any time along certain sections and a light segregation in the form of wands and defenders (plastic bollards) to shield cyclists from traffic. This was introduced as part of the scheme stemming from the Covid period when central government issued statutory guidance to local authorities to introduce measures which would encourage active travel, i.e. walking and cycling. At that time funding was given to local authorities by central government to introduce measures swiftly to capture opportunities of low traffic volumes and reallocate road space for cyclists and pedestrians. The government guidance called for physical separation of cycle lanes away from motorised traffic.

As a result of the trial, we have identified problems with the plastic bollards and defenders, but we have identified benefits with the cycle lane. The cabinet report recommends the retention of the cycle lanes but the removal of the light segregation i.e. plastic bollards and defenders. Given the on-going issues / concerns a proposal to remove the physical separation will be subject to a decision by the Executive Mayor on 15th May at Cabinet.

The report recommends making permanent the experimental cycle scheme whilst also recommends the removal of the light segregation in the form of wands and defenders (plastic bollards and the base units). The removal of the light segregation will improve the passage of emergency service vehicles on blue light running given that general traffic can move to the kerbside to allow them safe passage(at the moment the physical light segregation does not allow general motorised traffic to move to the kerb side to allow emergency vehicles through), additionally the removal of the light segregation will improve road safety given that we have experienced road safety problems with this physical measure. These are important factors for consideration in ensuring that the emergency services are not delayed when responding and that road safety for all road users are not compromised.

3. Impact of the proposed change

Important Note: It is necessary to determine how each of the protected groups could be impacted by the proposed change. Who benefits and how (and who, therefore doesn't and why?) Summarise any positive impacts or benefits, any negative impacts and any neutral impacts and the evidence you have taken into account to reach this conclusion. Be aware that there may be positive, negative and neutral impacts within each characteristic. Where an impact is unknown, state so. If there is insufficient information or evidence to reach a decision you will need to gather appropriate quantitative and qualitative information from a range of sources e.g. Croydon Observatory a useful source of information such as Borough Strategies and Plans, Borough and Ward Profiles, Joint Strategic Health Needs Assessments http://www.croydonobservatory.org/ Other sources include performance monitoring reports, complaints, survey data, audit reports, inspection reports, national research and feedback gained through engagement with service users, voluntary and community organisations and contractors.

3.1 Deciding whether the potential impact is positive or negative.

Table 1 – Positive/Negative impact

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

Protected characteristic group(s)	Positive impact	Negative impact	Source of evidence
Age	yes		Detailed analysis of statutory objections during experimental period. Consultant's report dated 7 December CAG consultancy has identified that of the total number of 1436 reasons stated in the 458 objections, 490 reasons stated (34%) were related to the light segregation
Disability	yes		ditto
Sex	yes		ditto
Gender Reassignment	yes		ditto
Marriage or Civil Partnership	yes		ditto
Religion or belief	yes		ditto
Race	yes		ditto
Sexual Orientation	yes		ditto
Pregnancy or Maternity	yes		ditto

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

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

3.2 Additional information needed to determine impact of proposed change.

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

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

Additional information needed and or Consultation Findings	Information source	Date for completion
The proposed change will include the removal of all light segregation (wands and	Outcome of statutory consultation between	April- Aug 2023
defenders) along the cycle scheme	April 2023 and August 2023 which included	online consultation
	reasons within statutory objections relating to	
	the light segregation	

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

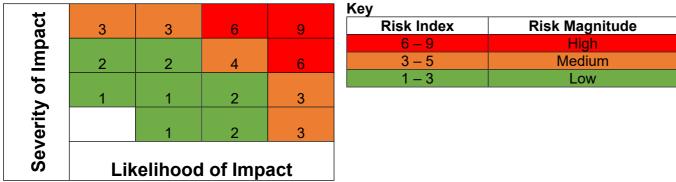
3.3 Impact scores

Example

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

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

Table 4 – Equality Impact Score



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

4. Statutory duties

4.1 Public Sector Duties

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

Advancing equality of opportunity between people who belong to protected groups.

Eliminating unlawful discrimination, harassment and victimisation

Fostering good relations between people who belong to protected characteristic groups.

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

5. Action Plan to mitigate negative impacts of proposed change

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

Table 4 – Action Plan to mitigate negative impacts.

Complete this table to show any negative impacts identified for service users and/or staff from protected groups, and planned actions mitigate them.				
Protected characteristic	Negative impact	Mitigating action(s)	Action owner	Date for completion
Disability	none			
Race	none			
Sex (gender)	none			
Gender reassignment	none			
Sexual orientation	none			
Age	none			

Religion or belief	none			
Pregnancy or maternity	none			
Marriage/civil partnership none				
6. Decision on the proposed change				

Decision	Definition	Conclusion - Mark 'X' below
No major change	Our analysis demonstrates that the policy is robust. The evidence shows no potential for discrimination, and we have taken all opportunities to advance equality and foster good relations, subject to continuing monitoring and review. If you reach this conclusion, state your reasons and briefly outline the evidence used to support your decision.	X Current light segregation (wands and defenders) is causing problems to both motorists and cyclists in addition to the emergency services responding to calls.
Adjust the proposed change	We will take steps to lessen the impact of the proposed change should it adversely impact the Council's ability to meet any of the Public Sector Duties set out under section 4 above, remove barriers or better promote equality. We are going to take action to ensure these opportunities are realised. If you reach this conclusion, you must outline the actions you will take in Action Plan in section 5 of the Equality Analysis form.	

Continue the proposed change	We will adopt or continue with the change, despite potential for adverse impact or opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the change. However, we are not planning to implement them as we are satisfied that our project will not lead to unlawful discrimination and there are justifiable reasons to continue as planned. If you reach this conclusion, you should clearly set out the justifications for doing this and it must be in line with the duty to have due regard and how you reached this decision.		
Stop or amend the proposed change	Our change would have adverse effects on one or more protected groups that are not justified and cannot be mitigated. Our proposed change must be stopped or amended.		
	on be considered at a scheduled meeting? e.g. Contracts and g Board (CCB) / Cabinet	Meeting title: Cabinet decision to determine The Future of The Brighton Rd Experimental Cycle Scheme Date:15th May 2024	
7. Sign-C	Dff		

Sign-Off

Officers that must approve this decision		
•	Name: Position:	Date:
	Name: Position:	Date:

Agenda Item 9

LONDON BOROUGH OF CROYDON

		• • • • · · · ·	
REPORT:	Cabinet		
DATE OF DECISION	15 May 2024		
REPORT TITLE:	Adult So	cial Care & Health Peer Challenge – Findings & Next Steps	
CORPORATE DIRECTOR / DIRECTOR:	Annette	McPartland, Corporate Director, Adult Social Care & Health	
		Bianca Byrne, Director of Commissioning, Policy & Improvement, Adult Social Care & Health <u>bianca.byrne@croydon.gov.uk</u>	
LEAD OFFICER:	Bianca Byrne, Director of Commissioning, Policy & Improvement, Adult Social Care & Health		
LEAD MEMBER:	Counc	cillor Yvette Hopley, Cabinet Member Health & Social Care	
KEY DECISION?	No	N/A	
CONTAINS EXEMPT INFORMATION?	No	N/A	
WARDS AFFECTED:	I	All	

1 SUMMARY OF REPORT

- **1.1** This report outlines the findings from the Adult Social Care & Health (ASCH) Peer Challenge that took place 21-23 November 2023, alongside the Directorate response and next steps. The full report is attached at Appendix 1, with a summary of our Assurance Improvement Plan containing key actions at Appendix 2.
- **1.2** ASCH invited the Local Government Association (LGA) to Croydon as a key part of our ongoing programme of continuous improvement and preparation for inspection. ASCH has a well-established Assurance Programme, convened in January 2023, and as a result undertaking a Peer Challenge exercise was an excellent opportunity to get an external perspective and temperature check on our self-assessed position and readiness for inspection.
- **1.3** A number of areas of good practice were confirmed through the review alongside key areas of improvement (a summary of the findings is contained at 4.7 in this report). Most notably the Peer Challenge confirmed that we know ourselves well, having clearly articulated to the Peer Challenge team our strengths and areas of challenge with evidenced, 'comprehensive and realistic transformation and improvement plans in

place which along with the adult social care and health strategy are monitored regularly and seen as living documents'¹. As a result, the findings outlined in the report were aligned with our assessment of our current position and have enhanced our existing improvement plans.

- **1.4** Delivery of our Assurance Improvement Plan has continued in the intervening period, delivering ongoing improvements identified. A summary of the key deliverables is contained at 4.10 of this report.
- **1.5** ASCH is keen to publish our Peer Challenge report and assurance plan as part of our commitment to transparency and to support our ongoing work with our local communities and partners to deliver, *continued positive change to ensure the best outcomes for the people of Croydon*².

2 **RECOMMENDATIONS**

For the reasons set out in the report and its appendices, the Executive Mayor in Cabinet is recommended:

- **2.1** to note the findings of the ASCH Peer Challenge contained in Appendix 1, and summarised in 4.7 of this report;
- **2.2** to support next steps and the journey of continuous improvement the Directorate is undertaking, as set out in section 4.9 4.10 of the report and our Assurance Improvement Plan at Appendix 2;
- **2.3** to support publication of the Peer Challenge Report and our associated Assurance Improvement Plan.

3 REASONS FOR RECOMMENDATIONS

- **3.1** The Health and Care Act 2022 put the Care Quality Commission's (CQC) assurance of local authorities on a statutory footing. The new duty on the CQC to assess local authorities' delivery of their adult social care duties under Part 1 of the Care Act 2014 came into effect on 1 April 2023. Linked to this new duty is a power for the Secretary of State to intervene where, following assessment under the new duty, it is considered that a local authority is failing to meet their duties.
- **3.2** Inviting the LGA in to undertake an ASCH Peer Challenge is a key part of the Directorate's programme of continuous improvement and preparation for inspection, and as a result the next steps outlined are crucial to enabling the Directorate to respond well to our forthcoming inspection.

4 BACKGROUND AND DETAILS

4.1 ASCH has a well-established Assurance Programme, convened in January 2023 to ensure improved delivery of ASCH functions and in preparation for the response to the CQC's new single assessment framework. The Programme Board meets monthly, chaired by the Director of Commissioning, Policy & Improvement, and is supported by

¹ Preparation for Assurance, Peer Challenge Report, London Borough of Croydon, November 2023, LGA – p. 40 ² Ibid – p.41

five thematic sub-groups – aligned to the four CQC themes along with a further themed sub-group focused on data and performance as this is a key risk identified on the ASCH and corporate risk register. The Assurance Board reports directly into the ASCH Departmental Management Team.

- **4.2** As part of our preparations, and to confirm our self-assessed position and readiness, ASCH invited the LGA to undertake a Peer Challenge in November 2023, the focus of which was as follows:
 - **The resident journey**: How well do we know our customer journey and what are the experiences and outcomes for people who use services and their carers?
 - Assurance, strategy and improvement approach: How well do we identify areas of risk, challenges or opportunities that may impact on residents across Adult Social Care, (e.g., quality, performance, workforce and finance), and then drive and monitor improvement?
 - **Partnership working**: To consider the upcoming assessments of Integrated Care Systems and highlight any place-based gaps, areas of innovation and best practice.
- **4.3** Alongside this, the Peer Team's work was focused on the CQC framework four themes for adult social care assurance. These are:

Care Quality Commission Assurance themes		
Theme 1: Working with people. This theme covers:	Theme 2: Providing support. This theme covers:	
 Assessing needs Planning and reviewing care Arrangements for direct payments and charging Supporting people to live healthier lives Prevention Wellbeing Information and advice Understanding and removing inequalities in care and support People's experiences and outcomes from care. 	 Market shaping Commissioning Workforce capacity and capability Integration Partnership working. 	
Theme 3: How the local authority ensures safety within the system. This theme covers:	Theme 4: Leadership. This theme covers:	
 Section 42 safeguarding enquiries Safeguarding Adult Reviews Safe systems Continuity of care. 	 Strategic planning Learning Improvement Innovation Governance Management Sustainability. 	

4.4 Each theme is underpinned by a set of quality statements, as outlined in the report attached at Appendix 1.

- **4.5** The team were on site in Croydon for three days between 21st to the 23rd of November 2023. In arriving at their findings, the Peer Team:
 - Held interviews and discussions with the Executive Mayor, Cabinet Members, Councillors, senior officers, partners, voluntary and community sector agencies, people who draw on services and carers.
 - Held meetings with managers, team leaders and frontline staff.
 - Read a range of documents provided by London Borough of Croydon, including a self-assessment (an objective, honest and authentic self-assessment of ASCH's strengths and areas for improvement, required as a key element of the CQC inspection), and completed a case file audit of twelve cases and further re-audit of five cases using the Customer Journey Case Tracking Audit Tool.
- **4.6** The Peer Team was given access to approximately 300 documents including a self-assessment. Throughout the Peer Challenge, the team had more than 34 meetings with at least 140 different people, spending over 184 hours with us the equivalent of 24.5 working days.
- **4.7** A key finding from the Peer Challenge is that we know ourselves well, having clearly articulated to the peer team the areas of challenge, gaps, improvements and support required in both our self-assessment and introduction session with the peer challenge team. This will be critical to the forthcoming inspection alongside having, 'comprehensive and realistic transformation and improvement plans in place which along with the adult social care and health strategy are monitored regularly and seen as living documents'³. As a result, the areas outlined in the report were aligned with our understanding of our current position, and as such enhance our existing improvement plans.
- **4.8** A summary of the findings strategic and operational contained in the report are as follows:

Theme 1: working with people	
Strengths	
 Community Led Support and community support framework, including Simply Connect, Community Hubs and PICs. 	
• 'Large and impressive' Managing Demand programme with focus on early intervention and prevention.	
• Culture shift 'away from care management to a strengths and asset-based approach'.	
• Carers Quality Improvement Initiative including early identification, Strategy, commissioning of whole family approach.	
 Reduction in waiting lists for needs assessment. 	
• One Croydon Health & Care Plan – focus on early intervention and prevention.	

Areas for improvement

- Hearing the voice of the resident 'often not very well heard in recorded good conversations and support plans'.
- Direct Payments offer and pathway.
- Occupational Therapy offer and pathway.
- Carers respite and waiting list.
- Timely completion of reviews and delivery of step-down and reduction in packages of care where appropriate.
- Role and involvement of Public Health in ASCH delivery of early intervention and prevention.
- Technology Enabled Care offer and pathway.

Theme 2: providing support Strengths

- 'Robust' Market Position Statement, market shaping and sustainability with focus on care outcomes.
- Robust performance management arrangements for provider market, and relationship with CQC.
- Locality Commissioning Model 'stands out as a superior alternative to traditional commissioning delivery'.
- Healthy Communities Together Programme, including development of ICN+.
- Review and redesign of hospital discharge pathways (Frontrunner programme).

Areas for improvement

- Communication and responsiveness to providers requesting review due to increase in needs, and timeliness of payments.
- Continuing Health Care (CHC) process and protocol.
- Relationship with Housing and associated pathways, e.g. supported housing provision, extra care.
- Equity of mental health social care provision (administered through section 75 arrangements) to other client groups regarding quality, service delivery and fulfilment of statutory duties.

Theme 3: How the Local Authority ensures safety within the system Strengths

- Safeguarding Adult Review reports, Croydon Safeguarding Adults Board maturity and partnership working.
- Active Lives service and support for transitions.

Areas for improvement

• Safeguarding pathway and allocation of resource.

Theme 4: Leadership

Strengths

- Voice of the Director of Adult Social Services (DASS) at CMT and relationship with DMT, Executive Mayor and Cabinet Member.
- ASCH vision and strategy, 'continued positive change to ensure the best outcomes for the residents of Croydon'.
- Visible and approachable leadership, with open door policy in place.
- Representation of residents on key boards, e.g. Managing Demand, CSAB and Scrutiny.
- Assessed & Supported Year in Employment (ASYE) Programme.
- Principal Social Worker role.

Areas for improvement

- Data maturity, performance and intelligent use of data reporting imperative for enhanced business intelligence and support, including for LAS.
- Delivery of routine audits.
- Staff morale, wellbeing and culture.
- Enhancing awareness of Directorate's functions and statutory requirements for members and Scrutiny.
- **4.9** Next steps following receipt of the Peer Challenge report have been as follows:
 - Findings and recommendations have been cross-referenced with established assurance improvement plan to ensure consistency;
 - Report and findings have been shared with the Corporate Management Team, Mayor's Advisory Board, in key partnership forums such as the One Croydon Alliance Senior Executive Group (SEG) and our Resident Voices Group, with partners who contributed to the Challenge such as Voluntary & Community Sector and provider colleagues, and with the Improvement & Assurance Panel;
 - A workshop with Scrutiny members to talk through the report and findings, and a planned deep dive into the Directorate functions to support Scrutiny with a deeper understanding of the role and statutory functions of ASCH;
 - Preparing for publication of the report on the Croydon Council website, with supporting communications strategy and plan;
 - Key documentation, including the self-assessment document, have been reviewed and updated to ensure they are current and consistent with findings;
 - Officers continue to work across directorates, supported by CMT, to address the wider issues identified.
- **4.10** In addition, the ASCH Assurance Programme and supporting sub-groups continue to drive forward continuous improvement across the Directorate in accordance with our Assurance Improvement Plan. Key deliverables achieved since the Peer Challenge exercise was undertaken in November include:
 - A reduction in waiting list times for Carers Assessments through increased funding for the Carers contract;
 - The launch of the Multiverse data academy for staff, through which 40 officers from across ASCH and our performance and finance business partners have started their Level 3-6 Diplomas to improve our digital and data capabilities;
 - The completion of an audit of 100 cases in strength-based practice, and corresponding development of an enhanced training offer for staff;

- Recruitment of a Mental Health worker to support early intervention through the Adult Early Intervention & Support Service (the ASCH 'front door'), providing enhanced support for complex cases with dual diagnosis;
- Established a structural review of the Mental Health operating model and contractual arrangements in partnership with health colleagues;
- Improved service efficiency and response time to residents through implementation of a portal for Occupational Therapy referrals;
- Launched the Transfer of Care Hub in Croydon University Hospital as a key part of the redesign of hospital discharge pathways;
- Implemented the revised Health & Wellbeing Board constitution.

5 ALTERNATIVE OPTIONS CONSIDERED

None. Delivery of our Peer Challenge and associated Improvement Plan is part of our approach to continuous improvement and preparation for inspection.

6 CONSULTATION

The report outlines the breadth and depth of consultation that took place during the Peer Challenge to inform the findings and recommendations.

7 CONTRIBUTION TO EXECUTIVE MAYOR'S BUSINESS PLAN

- 7.1 Delivery of the Assurance Improvement Plan contributes to the following Council Priorities set out in the Mayor's Business Plan:
 - i. The Council balances it's books, listens to residents and delivers good, sustainable service.
 - ii. People can live healthier and independent lives for longer.

8 IMPLICATIONS

8.1 FINANCIAL IMPLICATIONS

- 8.1.1 There are no financial implications arising from this report, all improvement work is being managed through existing resources.
- 8.1.2 Comments approved by Head of Strategic Finance Adult Social Care & Health on behalf of the Director of Finance (10/04/2024).

8.2 LEGAL IMPLICATIONS

- 8.2.1 CQC assurance arrangements are intended to provide assurance that Local Authorities are delivering their legal responsibilities under Part 1 of the Care Act 2014 and other relevant legislation.
- 8.2.2 Section 6 of the Local Authority Social Services Act 1970 requires the Council to appoint a Director of Adult Social Services [DASS] for the purposes of its social

services functions, other than those for which the Council's Director of Children's Services [DCS] is responsible under Section 18 of the Children Act 2004.

- 8.2.3 Those statutory social services functions are set out in Schedule 1 to the Social Services 1970 Act, as updated and amended.
- 8.2.4 Sections 7 and 7A of the 1970 Act require the Council to exercise their social services functions under the general guidance and directions of the Secretary of State and Section 78 of the Care Act 2014 applies similarly to guidance issued in respect of the specific social services functions under that Act.
- 8.2.5 The outcomes from the Peer Challenge will therefore assist the Council in the provision of its statutory social services functions.
- 8.2.6 Comments approved by the Head of Social Care & Education Law on behalf of the Director of Legal Services and Monitoring Officer (15/04/2024).

8.3 EQUALITIES IMPLICATIONS

8.3.1 The Council has a statutory duty to comply with the provisions set out in Section 149, Equality Act 2010. The Council must therefore have due regard to:

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

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

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

- 8.3.2 The protected characteristics defined by law are race and ethnicity, disability, sex, gender reassignment, age, sexual orientation, pregnancy and maternity, religion or belief, marriage and Civil Partnership.
- 8.3.3 Delivery of our assurance improvement programme will address any inequalities in service provision identified.
- 8.3.4 Comments approved Senior Equalities Officer on behalf of Head of Strategy & Policy (10/04/2024).

9 APPENDICES

- A LGA ASCH Peer Review Report
- *B* ASCH Assurance Improvement Action Plan



Preparation for Assurance Peer Challenge Report

London Borough of Croydon

November 2023

Final Report



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Background

London Borough of Croydon asked the Local Government Association to undertake an Adult Social Care Preparation for Assurance Peer Challenge at the Council and with partners. The work was commissioned by Annette McPartland, Corporate Director Adult Social Care and Health. Annette McPartland also acted as the Challenge Sponsor and selected three areas of focus:

- The resident journey: How well do you know your adult social care customer journey and what are the experiences and outcomes for people who use services and their carers?
- 2. Assurance, strategy and improvement approach: How well does Croydon Adult Social Care identify areas of risk, challenges or opportunities that may impact on residents across Adult Social Care, (e.g., quality, performance, workforce and finance), and then drive and monitor improvement?
- 3. **Partnership working:** To consider the upcoming assessments of Integrated Care Systems and highlight any place-based gaps, areas of innovation and best practice.

A peer challenge is designed to help an authority and its partners assess current achievements, areas for development and capacity to change. Peer challenges are improvement focused and are not an inspection. The peer team used their experience and knowledge of local government and Adult Social Care to reflect on the information presented to them by people they met, and material that they read.

As Preparation for Assurance Peer Challenge teams typically spend three days onsite conducting the challenge, this process should be seen as a snapshot of the client department's work rather than being totally comprehensive.

All information was collected on a non-attributable basis to promote an open and honest dialogue and findings were arrived at after triangulating the evidence presented.



The members of the peer challenge team were:

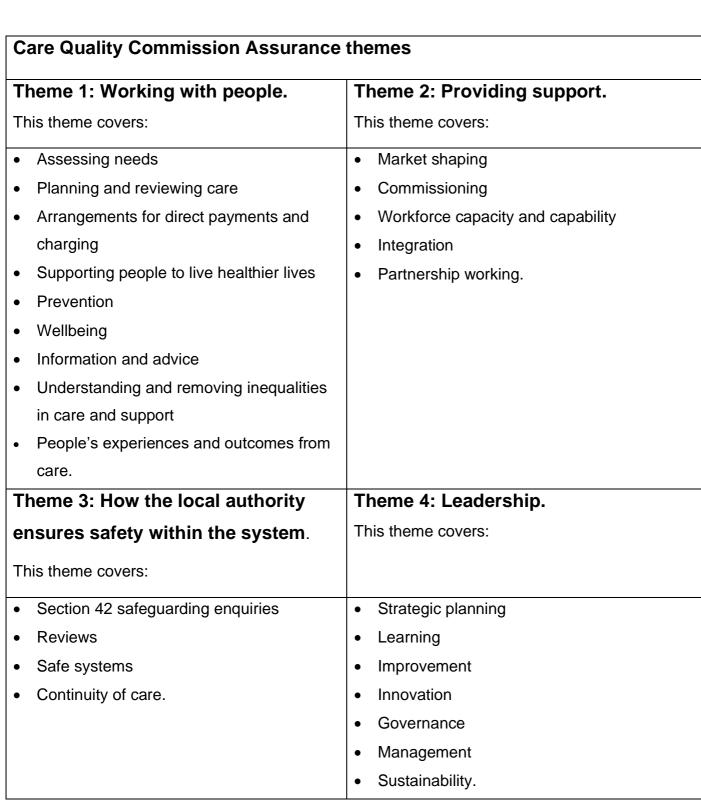
- Rob Persey, Executive Director of Health and Social Care, Brighton and Hove City Council
- Cllr David Fothergill, Leader of Opposition Somerset Council & Chair of LGA Community Wellbeing Board
- Conor Copas, Principal Social Worker, London Borough of Islington
- Mary Ogunlayi, Principal Occupational Therapist, Surrey County Council
- Kevin Beveridge, Area Director West Locality Cornwall Council
- Claire White, Challenge Manager in Training
- Abbie Murr, Local Government Association Associate

The team were in London Borough of Croydon for three days between 21st to the 23rd of November 2023. In arriving at their findings, the peer team:

- Held interviews and discussions with Councillors, senior officers, partners, voluntary and community sector agencies, people who draw on services and carers.
- Held meetings with managers, team leaders and frontline staff.
- Read a range of documents provided by London Borough of Croydon, including a self-assessment, and completed a case file audit of twelve cases and further reaudit of five cases using the Customer Journey Case Tracking Audit Tool.

Specifically, the peer team's work was focused on the Care Quality Commission (CQC)framework for assurance four themes for adult social care assurance.





The peer team were given access to approximately 300 documents including a selfassessment. Throughout the peer challenge the team had more than 34 meetings with at least 140 different people. The peer challenge team spent over 184 hours with the London Borough of Croydon, the equivalent of 24.5 working days.

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Initial feedback was presented to the Council on the last day of the peer challenge and gave an overview of the key messages. This report builds on the presentation and gives a more detailed account of the findings of the peer team.

Key Messages

There are several observations and suggestions within the main section of the report. The following are the peer team's key messages to the Council:

Message 1

The DASS and adult social care and health leadership team have a comprehensive understanding of their local community's needs and have a robust vision for adult social care that prioritises early intervention and prevention. This vision is supported by the newly updated Adult Social Care and Health Strategy 2021/25.

Message 2

The Council takes great pride in its vibrant community landscape, boasting not only an impressive count of 800 official charities but also a staggering 1000-plus local community resources. This rich tapestry of voluntary organisations is a testament to the diversity and resilience of the local voluntary sector.

Message 3

Croydon is a vibrant and culturally diverse borough where community spirit thrives. This is seen by the community's ability to deliver the borough of culture this year despite having limited financial resources.

Message 4

While there have been some positive signs of improvement in data accuracy, data maturity has not yet been fully attained. As yet, data cannot be easily cleansed and real-time dashboards are not yet implemented which could greatly assist operational

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managers in managing waiting lists, whilst providing robust oversight of operational performance and practice to the DASS and leadership team.

Message 5

There was compelling evidence indicating that the present mental health social care provision (administered through section 75 arrangements) was no longer equitable to other client groups across adult social care regarding quality, service delivery and fulfilment of statutory duties. This disparity may be attributed to potential role drift and a loss of clear social work/care identity as such the Council have plans in place to review current section 75 arrangements.

Message 6

The peer team identified a number of panel processes which in addition to other factors also considered placement/care packages costs. The peer team paid specific attention to these processes given there has been legal challenge nationally around panels that focus on costs and their role within the Care Act. However, following review the peer team were assured that the Council were acting in a Care Act compliant manner and that these processes added value and provided support to staff.

Theme 1: Working with People

Quality Statement 1: Assessing Needs

Adult Social Care Front Door

The adult social care front door is deployed by the Adult Early Intervention and Support Service (AEISS) and sits separately to the Council's corporate front door. Staff within this service are dedicated, professional and highly skilled. The key objective of the service is to provide appropriate and timely information and advice using a strengthbased, community-led support approach, ensuring residents who contact the service, in the main avoid the need to access statutory services. Those residents who require

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statutory support are referred to the appropriate team within the adult social care and health Directorate. Practitioners reported that 'proportionate good conversations' take place at the front door and information collected in the Council's adult social care database, Liquidlogic Adults' Social Care System (LAS), which carries forward to further assessment documentation within LAS to avoid duplication.

Self-serve portals have been developed to support demand management, and include adult, carer and financial assessments and professional referrals. The use of mandatory questions in the portals has been used to ensure comprehensive data input, and sign posting information sits within the portal assessments which removes demand on statutory services as people are signposted to community resources. The AEISS currently manage the self-assessment referrals as well as referrals from the community and professionals and all safeguarding referrals (which includes referrals from blue light services e.g. police via MERLIN reports and ambulance service.

Health and well-being assessors go out to the community with the aim of preventing reducing and delaying the need for statutory services.

Funding has been agreed to support the move to an integrated front door for Occupational Therapy referrals in line with the Managing Demand programme (discussed later in the report), with two Occupational Therapist Assistants recently appointed and ongoing recruitment to two Occupational Therapists in addition to project work around Technology Enabled Care (TEC) at the front door and reablement services.

Deprivation of Liberty Safeguards Authorisations

Croydon Council, as with the majority of Councils nationwide, faces backlogs of unauthorised Deprivation of Liberty Safeguards (DoLS) applications due to overwhelming demand surpassing available resources. The Council is acutely aware that no legal justification exists for unauthorised applications, as they function as the Supervisory Body and as a consequence are susceptible to judicial review.





The backlog of authorisations is duly documented in the adult social care risk register, accompanied by a series of robust control measures. These measures encompass collaborating with the commissioned advocacy service to establish a seamless administrative procedure for referring Deprivation of Liberty Safeguards (DoLS) applications, implementing a new DoLS framework, providing individual professional supervision and peer supervision for all Best Interest Assessors (BIA's), ongoing efforts to enhance DoLS business processes in LAS to minimise the time spent on report writing and to facilitate management oversight, organising quarterly provider forums to keep the managing authority informed about developments, temporary recruitment for the role of DoLS planner, and recruiting additional BIA's to augment capacity.

Workforce Capacity

Croydon adult social care has a workforce of 581 full-time equivalent staff spanning the adult social care and health directorate. The workforce demonstrates a commendable level of diversity, effectively reflecting the community's demographics. The Council has a centralised recruitment process, and substantial evidence supports their status as an inclusive employer.

South West London's adult social care workforce encounters significant challenges in recruiting and retaining employees. Consequently, the South London Partnership (SLP) commissioned the Social Care Institute for Excellence (SCIE) to formulate a strategy to effectively synchronise efforts among local authorities, the NHS, education and skills providers, and independent sector social care providers. The strategy is predominantly centred on the workforce of 34,000 individuals employed in South West London's adult social care sector e.g. employed by service providers in the independent sector and operate inside settings regulated by the Care Quality Commission (CQC). The broader workforce in South West London, consisting of 2,000 individuals employed in local authority adult social care positions and in the NHS, is regarded as integral to the recommendations and strategic opportunities that necessitate collaborative efforts across sectors. Underpinning the strategy, the Council



has produced a localised 'Workforce Development Project Plan,' and a new Workforce and Retention Development Officer has been recruited to support this project. In addition, the Council has commissioned 'Croydon Works', a local educational provider, to assess the existing recruitment pathways within the adult social care sector and explore new pathway opportunities.

Strengths

Community Led Support

In 2019, Croydon adult social care adopted the Community Led Support (CLS) and the Good Conversations and Strengths Based Model as its practice framework for adult social care. The National Development Team for Inclusion (NDTi) devised the approach and staff were consulted and trained in this new way of working by NDTi. Adult social care was restructured into 6 locality-based teams for the provision of Care Act duties and community development. The objective of the approach was to facilitate the transition of adult social care from conventional care management approach to a more proactive approach that empowers individuals and communities to independently determine the outcomes they wish to achieve, and how they can use their existing strengths and local networks to achieve their outcomes.

In addition, CLS highlights the importance of effectively managing public expectations of 'social services', whilst redefining the local 'offer' in collaboration with voluntary organisations and community groups at a local level. A main focus of the model is on ensuring people receive support quickly, before crises occur which requires a robust 'front door' that can effectively manage demand and capacity across the adult social care and health system.

Feedback from adult social care managers, practitioners, and local VCSE organisations concluded that the approach represents a positive and substantial paradigm change in how practitioners, organisations and local communities work

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together. All those spoken to acknowledged the potential for growth and improvement, emphasising the collective commitment to enhancing the support infrastructure within the community.

Strength-Based Approach

The Principal Social Worker's 100-day report and subsequent development and implementation of strength-based audits highlighted that often the voice of the person was not very well heard in recorded 'good conversations and support plans. As a result, strength-based training was reinvigorated. Good examples were cited by practitioners and managers to illustrate the positive impact of such training.

Managing Demand Programme

To support the CLS practice framework and align adult social care and health activity and spending with the London averages for working age and older adults, the Director of Adult Social Services (DASS) has created a Managing Demand Programme for adult social care. The managing demand programme is founded upon the six steps to reducing demand in adult social care as outlined by the Institute of Public Care (John Bolton and Philip Provenzano, March 2017).

This is a large and impressive programme, led by the Strategic Commissioning and Improvement Teams, to ensure that adult social care continues to do more to manage demand and spend whilst maintaining sustainability so that residents achieve good outcomes and statutory functions are met. The managing demand programme has not only improved communication across the directorate and between other Council directorates but in addition has drawn out the strengths of Croydon as a Council as well as identifying areas of weaknesses. The programme has a number of key workstreams and projects, which will be discussed in more depth throughout the report in line with CQC themes and quality statements.

'Good Conversations'





Assessments are based on strengths-based 'good conversations' that draw on the adults' strengths, personal and community support networks and resources. The Principal Social Worker (PSW) is central in this space and is leading the way in implementing innovative strength-based training, strength-based audits (to ensure the voice of the adult is heard) and improvements to LAS (the adult social carers recording and reporting database) to support robust 'good conversation' and risk assessment recording. Practitioners spoken to voiced the importance of 'good conversations' and gave many examples of strength-based 'good conversation' assessment outcomes utilising local assets. It is evident that a culture shift has successfully taken place away from care management to a strength and asset-based approach.

Advocacy Contract

The Council currently commissions Advocacy for All who provide advocacy (both statutory and non-statutory), and work alongside MIND in Croydon who provide the Independent Mental Health Advocates (IMHAs). The service is funded via the Better Care Fund (BCF); this allocation is ring-fenced for this specific service in accordance with the agreed schemes of the Better Care Fund.

In April 2023, a consensus was reached to extend the current contract by a further 18 months, to enable the Council to evaluate and update its advocacy model and review current Key Performance Indicator's and Outcomes with the intention of them being aligned with the National Advocacy Outcomes Framework developed by NDTi. Work is underway to explore ways in which the adults and children's advocacy services could be joined up via a procurement exercise to ensure a streamlined approach to advocacy across a resident's lifespan.

Carers Quality Improvement Initiative

The 2021 Census reports that 28,831Croydon residents (7.9% of the population) provide some form of unpaid care, with 49.8% of unpaid carers providing up to 19 hours of care per week and 27.2% providing fifty plus hour of care a week. It is likely that this is an underestimate considering those who are unrecognised within their

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caring role. Local data depicts an emerging demand with an estimated 792 young people (66% under eighteen's) now registered with the young carers service.

Results from the Survey of Adult Carers (SACE) 2021-22 highlighted that only 20.7% carers who had received support or services felt they were very or extremely satisfied with the support or services they received in comparison to 32.4% reported in 2018-19. Furthermore, only 25.8% of carers indicated that they had as much social contact as they wanted.

Based on the performance data, feedback from carers, and insights gained from staff, the adult social care leadership team is fully cognisant of the necessary improvements required for improving the local carers' offer. Consequently, a carers quality improvement initiative has been established which includes a set of commissioning intentions as highlighted in the May 2023 Market Position Statement (MPS). New ways of working have already commenced which include work around identifying carers at an early stage to provide appropriate support, updating the carers strategy, recommissioning of the carers contract to incorporate respite services, and exploration of a collaborative commissioning opportunity for an all-age carers service.

Carers Partnership Board and Carers Centre

The Council hosts a Carers Partnership Board that convenes every quarter, with the board's governance strategically situated, to effectively tackle crucial issues about carers. Although the board enjoyed a significant attendance before the advent of COVID-19, it has needed support in maintaining its membership in the aftermath of the pandemic. Proactive strategies have been developed to reconstruct the board, encompassing recruitment initiatives targeting a diverse range of carers, including young carers, carers of children with additional needs, working age and older carers. Furthermore, comprehensive plans have been devised to assist newly appointed board members through the provision of easily accessible material, pre-meeting

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briefings, and scheduling sessions in a manner that accommodates the diverse caregiving requirements of various groups. Additionally, meetings will be held in community settings and virtually.

The Carers Centre for carers, is seen as a indispensable lifeline for carers that functions as a sanctuary, providing a venue for socialising, fostering relationships, participating in non-caregiving activities, and exchanging personal stories.

The Carers Centre offers necessary well-being support and respite services without the need for appointments and prides itself on being *"intergenerational and intercultural,"* catering to a broad spectrum of carers and establishing an inviting and inclusive environment. Trained advice workers manage an advice line accessible through both email and telephone conversations and also a cafe which open Mondays, Wednesdays, and Fridays.

All those spoken to shared the same view that the services and resources provided are 'outstanding'. The Carers Centre unequivocally demonstrates its commitment to improving carers wellbeing and health by offering robust support, promoting direct payments, and furnishing comprehensive information, advice, and signposting services.

Needs Assessment Waiting Lists

A substantial reduction in waiting lists for needs assessments has been achieved as a result of the introduction of a RAG rating system. Urgent cases (designated as red) receive same day visit/contact, Amber cases are seen/contacted within five working days and green cases within 28 days. Practitioners and managers reported that waiting lists for needs assessments are monitored weekly via LAS task tray reports, which provides robust management oversight across the adult social care and health directorate. In addition, there is a waiting list protocol in place which is subject to regular review by managers.

Considerations



Pathways into Services from Front Door

Front door into services is at times confusing and that connection points need to be simplified. In recognition of this issue, under the Managing Demand programme, adult social care has recently mapped all customer journeys from the front door into services to ensure there is a clear customer journey (pathway) across all client groups, and has updated the information and advice provided on the adult social care section of the Council website to provide clarity to residents on the different pathways into services.

Front Door: Neurodiversity, Homelessness and Care Leavers with Support Needs but no Care Needs

The Council has a number of young adults who present with support needs but no care needs. This client group largely consists of with autism and other neurodivergent conditions aged between 18 to 25 years of age who don't meet the mental health community teams thresholds or the learning disability thresholds. This has resulted in the front door holding these cases for 6-7 weeks to keep people safe and mitigate risks as there are no clear pathways in place.

Practitioners reported that at least 40% of homelessness cases they are working with at the front door are young adults identified as neurodivergent. Although there is a 'Autism Strategy and partnership board in place practitioners reported the need for clear pathways and service provision that focused on early intervention and prevention as well as a specialist learning disability qualified social worker and specialist autism and neurodivergent social worker based within the front door.

Senior managers clearly recognise that some workforce remodelling will need to occur, and a delivery partner has been sought to add pace and capacity to transformation aspirations.

Carers Respite

Several carers expressed their frustrations with the absence of respite services. The Council is well aware of the enduring frustrations experienced by carers and as such,

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are reviewing and developing access to respite care and short breaks, as explicitly outlined in their May 2023 Market Position Statement.

Carers Assessments Waiting Lists

Front line practitioners shared how pathway for carers assessments had changed over recent years. Practitioners reported that historically they had been advised to refer carers to the Carers Centre for assessment and as a result very few carers assessments were being undertaken internally. However, the pathway has since been reviewed and improvements put in place to address this issue.

Currently there is a waiting list of 26 weeks for a carers assessment due to the confusion in the pathway which had resulted in all new referrals being passed to the Carers Centre.

Waiting Lists: Views of Residents

Although evidence was seen that waiting lists have significantly reduced across adult social care locality teams stories were shared by carers and those who draw on services regarding their frustrations stemming from the absence of named or allocated social worker/practitioner. Overall, carers felt their assessments and care needs are not adequately addressed, with a waiting list for carers' assessments adding to their frustrations.

Occupational Therapy (OT)

Occupational therapists (OT's) reported that current staffing capacity is a continual obstacle in meeting the ongoing demand and effectively managing a long-standing waiting list due to the number of vacancies (recruitment of OT's national issue). General Practitioners expressed concerns about the extended waiting periods for OT assessment and attributed this to inadequate resources provided by the Council and ICB (joint funded and staffed team). Consequently, health professionals have been actively seeking alternative means to access OT services. One such approach involves utilising falls clinics, which often have OTs readily available.





To tackle the issue of chronic waiting lists and ongoing demand, the occupational therapy service has created a duty rota. This operational measure has proven to be highly effective in expediting the waiting lists, significantly reducing 900 cases to 475 cases. A RAG rating system has been successfully established to effectively prioritise adults presenting with high levels of risk and complex needs. As a result, these adults are assured of an assessment within two weeks. For those who are not considered high priority, there is an approximate wait of eight months before receiving an assessment, a timeframe that both adult social care managers and the OT service acknowledge as unacceptable with OT waiting lists now recorded on the adult social care risk register. As such, workforce plans have been established to address the challenges posed and to support a greater focus in Information, and Advice and early intervention and prevention, resulting in the recruitment of two OT assistants at the front door and a further two front OT posts currently out to advert.

In addition, a Principal Occupational Therapist has been employed who is currently reviewing current processes with the view to implement new system approaches to address both capacity and demand issues as well as introducing apprenticeships and a preceptorship programme. Front-line practitioners reported that there is now a much simpler referral process, whereby they are able to successfully escalate concerns and priority for OT assessments in cases of high risk. In addition, the peer team found there to be mutual respect between social workers and occupational therapists, and it was apparent that there were good working relationships between services.

Reviews

Timely completion of annual reviews is an ongoing challenge across adult social care (as is the situation with the majority of adult social care departments across the country). In 2022-23, 36% of the total annual reviews were completed. Although low, this is a significant improvement compared to the previous year, 2021-22, during which only 19% of annual reviews were completed. A Reviews project group is in place to support with further reduction of the backlog. In addition, there is a robust management



oversight and reporting system in place regarding the backlog of reviews, which extends to the Performance Board and the Departmental Management Team.

The peer team identified that gaining a grasp on the backlog of reviews was essential. Firstly, considering the possibility that a portion of these residents may have experienced a reduction in their care and support needs that could potentially result in reduced to no costed support during a period of financial difficulty for the local authority, and secondly, the potential harm to the Council's reputation, not only from possible Local Government Ombudsman complaints that would be upheld if found that a review had not been completed but also from the impending Care Quality Commission (CQC) assessment of assurance given the low completion rate of reviews. Considering both these areas, the peer team was surprised to see that the backlog of reviews is not documented in the adult social care risk register, whereas the backlog of OT assessments is. The peer team proposes that the inclusion of the backlog of reviews into the adult social care risk register be deliberated by the Directorate Management Team (DMT) along with risk mitigation plans on how to rapidly reduce the backlog.

Quality Statement 2: Supporting People to Live Healthier Lives

Strengths

Prevention Framework and Managing Demand Programme

The Councils Prevention Framework is currently under review through the One Alliance Proactive and Preventative Care Board; this review will take place in relation to the wider review of Croydon's Health and Wellbeing Strategy and the Health and Care Plan.

Work is underway to further improve the early intervention and prevention offer at the front door which is being led via the Managing Demand Programme. The primary objective is to provide an integrated front door function which is essential in ensuring that all referrals and contacts with residents occur promptly and are managed by the

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appropriate professionals. The peer team heard how the programme is being undertaken collaboratively with system partners to ensure the approach is embedded across the adult social care and health system.

One Croydon Health and Care Plan

The One Croydon Health and Care Plan Refresh 2022 – 24 prioritises early intervention and prevention. The strategy's objective is to assist individuals before issues arise while encouraging residents to take a more proactive approach to their health and wellbeing. Notable accomplishments thus far encompass the establishment of Community Hubs, which have effectively provided proactive advice and guidance about housing and benefits to 258 individuals between September 2020 and April 2021. Additionally, individuals have benefited from early intervention and prevention support delivered by Personal Independence Coordinators, resulting in a noteworthy average improvement of two points (as measured by the Short Warwick Edinburgh Mental Wellbeing Scale) in their overall wellbeing within two months.

Croydon Voluntary Action (CVA) and Simply Connect

Croydon Voluntary Action (CVA) based in West Croydon is an organisation that encourages and supports local community representation through voluntary action. CVA offers a building to hold group meetings, a straightforward way of volunteering and contact details of established groups across the local community.

Simply Connect, which is managed and delivered by Croydon Voluntary Action is a database that is kept up to date by dedicated volunteers whereby local VCSE organisations can sign up to simply connect and add their contact details and details of services. Since the pandemic simply connect is now more officially aligned with the Council, especially via the adult social care front door and across the Integrated Community Networks (ICN+).

Considerations

Prevention Space and Public Health





Public Health is positioned corporately, separate from the adult social care and health directorate, however, that a representative from public health does attend adult social care and health departmental management meetings. Despite this, Public Health appeared to be invisible in regard to the early intervention and prevention agenda. Furthermore, GPs and primary care colleagues reported that public health's engagement had diminished over recent years.

Technology Enabled Care (TEC) Offer

Further work is required to ensure practitioners understand the benefits of technology, what is available and how to go about assessing need for technology. In relation to the early intervention and prevention agenda the benefits of TEC were understood by the Council and as such the Council are in the process of seeking a delivery partner to review and make recommendations to improve the Councils current TEC offer.

Accessible information and advice

The existing advice and information contract, currently held by the Citizens Advice Bureau, has been extended for an additional year until March 2025. This extension will enable the Council to plan the contract's future strategically, aiming to optimise its impact. The Council are keen to ensure that the new contract encompasses not only advice and guidance on adult social care but also on public health, housing and homelessness prevention, debt advice, domestic violence and assistance for families, and support with benefits.

Adult social care information and guidance pertaining to accessibility and availability was raised by a number of carers and people who draw on services. This was in relation to clarity around residents' entitlements and expectations from social care and the Council website being 'confusing' and 'difficult to navigate,' and that guidance and information is often unavailable in the variety of accessible formats required by the adult and/or carer. The Council is well aware of these issues, and have prioritised a review of the adult social care pages of the Council website as a result. This process is nearing completion, with user testing a key component of the review.



Self-Directed Support

The current uptake for Direct Payments stands at 18.3% which is below the national average. Adult social care have established a Direct Payments Project with the aim to significantly improve independence, choice and control available to residents and move to a position where Direct Payments become the first choice for locality-based care and support and that any decision over whether or not to choose a Direct Payment will rest with the resident or their carer.

Quality Statement 3: Equity in Experiences and Outcomes

Strengths

Equality Strategy and Pledges

The Council has implemented a revised Equality Strategy 2023 - 2027, which offers a comprehensive overview of their commitment to equality. The strategy outlines the Council's equality objectives and measures to integrate equality throughout the Council in the upcoming four years. Multiple staff and managers spoken to by the peer team showed awareness regarding the strategy and could articulate several objectives contained in the strategy.

To support the strategy the Council has established two pledges which local organisations can also sign up to through the Council's website.

Hard to Reach Groups

A valuable resource accessible to the residents of Croydon is a specialised bus stationed at Fairfield Halls, catering to individuals with care and support needs and those experiencing homelessness who may encounter difficulties in accessing statutory services. Many of these adults have difficulty in engaging with services and community led support opportunities like the bus are used to connect with them.

Asian Resource Centre and Brigstock and Woodside Hubs





The Asian Resource Centre is seen by residents as a vital and successful community resource, which serves as a community hub along with the Brigstock and Woodside hubs. Residents can attend these hubs to receive information, advice and guidance on a diverse range of matters, including housing, benefits, mental health, and so on. Community Facilitators and volunteers work within hubs and have undergone training in strength-based 'good conversations'. Social prescribers, adult social care, and health staff also make referrals to the hubs. Furthermore, an extensive long-term condition outreach programme is delivered by the Black and Minority Ethnic (BME) Forum and Asian Resource Centre, encompassing community events, training community champions, and providing health checks.

Combatting Drug Partnership Board

The over-arching purpose of the Combatting Drug Partnership Board is to deliver the key outcomes of the National Drugs Strategy, "From Harm to Hope' - A 10-year plan to cut crime and save lives" The board is accountable to the local Safer Community Partnership and to the Health and Wellbeing Board.

The board currently oversees plans submitted for funding allocation of the Supplementary Substance Misuse Treatment and Recovery Grant, the Rough Sleeping Drug and Alcohol Treatment Grant and the future Housing Support Grant. In addition, the board identifies current and future substance misuse issues and the needs of the local community and ways in which the board and their associated action programme can help minimise the impact of substance misuse and improve residents' quality of life by working in partnership to tackle issues through shared targeted intelligence and evidenced driven interventions.

Considerations

Hard to Reach Groups: Housing

Adult social care recognise that further collaboration with housing colleagues is required to enhance their comprehension of the advantages of employing a strengthbased approach when working with marginalised groups who may be reluctant to

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engage with statutory services due to various factors. An illustration was provided of individuals with mental health conditions who are presented with eviction notices despite the possibility that earlier intervention and preventive measures could have averted such circumstances.

Equality, Diversity and Inclusion Board (EDI)

Despite the peer team's enquiries, it became evident that practitioners and managers spoken to possessed a limited understanding of the EDI board and its activities. The peer team also observed with curiosity that the PSW is notably absent from this board, which they considered strange, considering that one of the PSW's statutory roles is to advocate for equality, diversity, and inclusion across the workforce.

Implementation of Workforce Racial Equality Standards (WRES)

To further promote the significant work the Council are undertaking in addressing workforce inequalities they may wish to consider implementation of the workforce racial equality standards which are a statutory requirement of NHS organisations.

Theme 2: Providing Support

Quality Statement 4: Care Provision, Integration and Continuity

Strengths

Market Position Statement, Market Shaping and Sustainability

The Council have a robust Market Position Statement 2023 in place where the voice of the resident and those who draw on services and carers is clearly heard throughout as a result of the commissioning team actively engaging with the Resident Voice Group.

Croydon has the largest care market across all London Boroughs, with an impressive 311 registered care providers and 130 care homes. They have developed a clear and sustainable market cost of care strategy with clear pathways, ensuring a fair cost of

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care within a three-year horizon as well as their commitment to aligning with the London minimum wage whilst staying within budget constraints is noteworthy. In addition, the peer team heard how the cost of care has helped establish stability in the market and improve communication between the Council and providers.

The Council has strategically benchmarked itself against LGA standards and utilised extensive data, including national wage consultations with South West London authorities to inform their strategy. The peer team heard how Care Cubed is used to identify appropriate cost of care and to shape the market away from one-to-one support if not required. Adult social care managers and commissioners clearly recognised and understood that the need to use this tool alongside robust needs assessments is essential.

The Council is actively engaged in market shaping efforts, collaborating with residents and those who draw on care and support services to discern their preferences. Collaborations with the voluntary sector, exemplified by the mental health well-being hub, showcase their commitment to meeting community needs. The Council recognises the importance of identifying necessary tools, education, and training, signalling openness to strategic discussions and their understanding of the interconnected touchpoints that influence the overall market strategy.

The Council has embarked on an aspirational journey in shaping care outcomes which includes moving away from time and task homecare to an outcome focused framework, as well as adapting existing and converted buildings to cater to the complex needs of residents and potentially incorporating long-term care, step-up, and step-down beds. In addition, the Council has undertaken significant work looking at overprovision by some providers to assure themselves of accurate levels of need. Examples of this work has included unplanned reviews in some establishments to look at the head count of carers on site against the record of how many residents are supported in a one-to-one way which is commendably proactive.

Provider quality team





The Councils Quality Provider Team comprises of Care Quality Officers who are responsible for overseeing regulated care services and supported living. Council quality officers and managers described rigorously reviewing contracts and robust contract monitoring via scrutinising contracts and reviewing contractual KPIs and outcomes.

Evidence seen suggests that the commissioning team employs robust performance management arrangements, providing visibility and assurance regarding the Councils Care Act duties related to quality and sustainability. The team actively reviews outcomes experienced by residents, utilising information on risk and performance to inform strategic resource allocation. This comprehensive approach reflects a commitment to continuous improvement and effectiveness in fulfilling the Councils Care Act obligations. In addition, the Council have worked closely with CQC to develop a single and clear risk assessment matrix and it was evidential to the peer team that the Councils focus is on the quality and improvement.

The Council knows their market well and monitor and drive improvement, working closely with CQC to achieve this. CQC reported that they have a good and well-established relationship in place with the provider quality team and the commissioning service and have monthly meetings with commissioning and adult social care as well as conducting provider engagement sessions 3 or 4 times per year.

The Council reported *"good quality local providers"* which is evidenced by 88.6% of providers rated as good or above by CQC. Residents placed outside of the borough were shown to encounter greater challenges in terms of the quality of care and experience poorer outcomes. The Council reported that their ambition is that by the spring of 2024 they will have no providers that are requiring improvement or inadequate.

Market innovation: Locality Commissioning Model

The Council takes great pride in its vibrant community landscape, boasting not only an impressive count of 800 official charities but also a staggering 1000-plus local

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community resources. This rich tapestry of voluntary organisations is a testament to the diversity and resilience of the local voluntary sector.

Recognising the challenges that smaller organisations may face when navigating large tender processes, the Council has adopted a progressive approach through the locality commissioning model. In response to this, One Croydon Alliance, a collaborative initiative involving representatives from the Council, health, and voluntary sectors, has come together in partnership. The model aims to pool resources, share the burden, and create a more inclusive space for smaller entities that may not have the capacity to engage in extensive tendering.

The result of this collaborative effort is the development of a comprehensive community plan. This strategic document outlines collective actions that bridge the gap between various sectors, particularly health and social care networks. The plan is not just a theoretical framework; it has been the product of numerous engagement sessions involving residents and charities. These sessions have fostered a deeper understanding of community needs and aspirations, ensuring that the plan is not only comprehensive but also reflective of the diverse voices within Croydon.

The locality commissioning model acts as a pivotal agent in this process. It plays a crucial role in ensuring that financial resources are directed to the right parties, thereby supporting the effective and equitable delivery of services at the grassroots level. This ensures that the impact of initiatives is not only widespread but also tailored to the specific needs of different localities.

The success of this collaborative model is grounded in the relationships built over time, characterised by trust and shared respect. While acknowledging the diversity and maturity variations across different areas within Croydon, the collaborative approach stands out as a superior alternative to traditional commissioning delivery. This is particularly notable for its avoidance of a potentially counterproductive "bidding wars," ensuring that the focus remains on fostering community well-being and sustainable development.



Considerations

Voice of those who draw on services and their carers.

Various perspectives regarding the quality and timeliness of care and support services were shared by carers and those who draw on services. A carer expressed her satisfaction with the care given to her daughter as *"a tremendous help"* in assisting in personal care and meal preparation. Another adult who receives homecare services expressed their satisfaction with the care they received, describing it as *"consistent, flexible and reliable"*. A young adult recounted their successful journey towards independent living, aided by the invaluable support of *"dedicated carers."* They also expressed profound appreciation for the indispensable assistance their social worker and the Council provided.

Less favourable views and experiences were shared which focused on frustration regarding the lack of feedback and responsiveness from the Council. Several participants also emphasised a desire for a shift away from what they perceived as a crisis-centric model, where social workers are only involved in moments of crisis.

Quality Statement 5: Partnerships and Communities

Strengths

One Croydon Alliance: The Healthy Communities Together Programme

In 2021, the One Croydon Alliance was named one of six health partnerships in England to benefit from funding through The Healthy Communities Together programme, established by The King's Fund and The National Lottery Community Fund. The Healthy Communities Together programme is a four-year programme that has run for three years. It is a partnership between adult social care, health and the voluntary sector with the aim of supporting people in the community with a focus on early intervention and prevention. The alliance has allowed voluntary organisations to come together and help with matters such as obesity, mental health issues,

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transformation etc. The funding is supporting partnership-working between the voluntary and community sector, the NHS and local authorities to support them make the most of their combined capability to improve the health and wellbeing of the local community.

Part of the programme has seen the development of six Integrated Community Networks (ICN+) that brings together adult social care, the Integrated Care Board (ICB), Health, South London and Maudsley Mental Health Services (SLAM) and VCS agencies with early intervention and prevention at the centre of continued service development. Health and well-being advisors go out to the community with the aim of preventing reducing and delaying the need for statutory services.

GPs shared that there had been eight years of hard work around the development of ICN + and huddles, with the initial aim to develop wrap around services based on a person's social care and health conditions. However, given the continued pressure on all services in terms of demand this has not been as effective as hoped but they continued to work towards this aim.

The ICN+ programmes aim is to promote collaborative multi-disciplinary team (MDT) working via huddles and multi-disciplinary team meetings with each ICN linked to a GP practice that reduces delays and duplication across agencies and ensures the person is seen by the right professional at the right time and place. Front-line adult social care practitioners reported the strengths of integrated partnership working and the benefits of having expert advice from health and social care professionals which results in improved outcomes for the person.

All professionals spoken to agreed that whilst on a noble and aspirational journey more work is required to ensure consistency with the ICN+ locality model due to the current variation of processes and working practices across the system.

Hospital Discharge – Frontrunner Programme

Ground-breaking work has been achieved by One Croydon Alliance which resulted in the system being selected as one of six trailblazers of the Hospital Discharge

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Frontrunner Programme with integrated care funding of £800k. The programme is intended to support Council and NHS teams to work more closely together to improve care and support available in the local community and triple the number of residents to regain their independence at home after a hospital stay.

The peer team noted that as a system Croydon has invested considerable effort in refining the discharge process, establishing a clear two-step pathway and offering wrap-around services, predominantly nursing-led. The overarching ethos is *"to do with you, not for you,"*.

The Front Runner initiative has yielded positive outcomes, fostered a sense of unity and prioritised the mantra of doing the "right thing for the right person." The programme aspires to further enhance pathway 0, extending its focus beyond hospital discharge to proactive hospital avoidance strategies. The incorporation of rapid response beds, co-located spaces with therapy services, and the utilisation of trusted assessors for reablement underscore a commitment to comprehensive care.

Key outcomes identified for the success of the discharge project include early discharge planning, ensuring individuals receive the appropriate care package, understanding the allocation of resources, and establishing a supportive environment for carers to have a voice in the decision-making process. The aspiration is to continue building on the foundation that has been laid, fostering a collaborative approach that places the well-being of individuals at the forefront of the discharge process.

However, amidst these successes, challenges have surfaced, including issues with data collection, information accuracy, and IT-related obstacles. The existence of separate systems for health and social care has compounded the challenge of accessing information while working in the community.

Integrated Care System (ICS) and Integrated Collaborative Working

The ICS encompasses six London Boroughs, including Croydon, wherein each Director of Adult Social Services (DASS) assumes responsibility for a particular system



area, ensuring that the perspectives of the London Boroughs are well represented across the ICS. The DASS for Croydon takes the lead on older people across the system. There is a commitment from all partners to prioritise the wellbeing of all communities and the ongoing development of a range of preventative measures.

The depth of relations and strong long-standing foundations between health and adult social care has enabled strong system working across the ICS. There was evidence of considerable trust in partnership working relationships which was demonstrated in the positive impacts of ICN+. The best quote heard from a participant regarding integration during the peer programme was *"if every staff member could see the 20% added benefit of integrated working"*.

Considerations

Voluntary, Community and Social Enterprise Sector (VCSE)

Voluntary and community sector managers voiced their frustrations that the 'system' is not being clear about the role and contribution of the VCSE and that the 'system' needs to remember that the VCSE needs funding clarity alongside strategic clarity. VCSE managers reported that bureaucracy within the Council was a barrier to effective working with the Council, giving examples of the need to write bids, report on progress and the expectation of attendance at too many boards and meetings. A number of organisations reported that they had lost funding but had anticipated this and sought funding elsewhere to remain operational. Several participants described communication with the Council as "poor," and not feeling heard by the Council. In addition, several participants of the session said that GDPR and data sharing issues were used as an excuse by the Council to continue working in a hierarchical way with a relationship that felt inequitable and a power imbalance that needs to be acknowledged and addressed by the Council.

These organisations stated that they are key partners and would like to do more to support local challenges but felt that the Council and system partners did not recognise





the significant value of the voluntary sector in delivering against their own agenda and stated that the sustainability of the voluntary sector services feels very uncertain.

Due to the challenging financial circumstances experienced by the Council as a result of three consecutive Section 114 notices and the Councils necessary funding constraints, the Council's relationships with the VCSE have been adversely impacted.

Relationships with Integrated Care Board (ICB)

There appeared to be a progressively challenging and tense relationships between adult social care and the ICB, particularly concerning Continuing Healthcare (CHC). Adult social care practitioners and managers expressed that they had all undergone extensive training in CHC and, as a result, possessed a high level of confidence and proficiency in completing CHC checklists. Nevertheless, practitioners have consistently observed that the default stance of the ICBs is invariably *"no"*. In fact, one practitioner went as far as to assert that the ICBs were exploiting Section 91 of the Health and Care Act and used it as a pretext for every checklist. Practitioners reported frequently seeking legal guidance to assist them in addressing challenges and consistently ensure they have a solid evidence base to contest the CHC outcomes.

Housing

Senior leaders openly acknowledged the lack of investment in Council properties during the previous seven years and emphasised the need for significant transformation. A substantial housing programme has been developed to address the number of related housing issues across the Council with eighty projects that sit underneath the programme.

There was a recognition that supported housing for people with a mental health condition needs to be refreshed given the significant demand for housing and maintaining tenancies support. There are currently two contracts to meet the needs of people with mental health conditions. Hestia provide 140 units and Evolve provides twenty-seven purpose-built units in three properties. A floating support contract with Hestia is now aligned with the front door and can be accessed to support people who

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do not meet statutory thresholds for adult social care but do have housing support needs, e.g. support with finances, paying tax and rent. The peer team agreed that this is a good preventative service that will support in reducing demand to adult social care, especially at the front door. In addition, there is now a partnership board in place to address housing issues for those residents with a mental health condition that has representation from adult social care, housing and the South London and Maudsley mental health trust (SLAM).

The recent restructure in housing has led to better joint working with an adult social care accommodation strategy in the process of being developed which will consider the future needs of people living in Croydon in collaboration with residents. Trusted assessors are now in place for housing relating matters and families who have no recourse to public funds. There are also plans to have a housing officer based in Croydon University Hospital to ensure that all pathways are explored for people leaving hospital. A rough sleeping and housing plan is in place for each rough sleeper with a number of pathways that link to the street drinking project and pathways into adult social care. Good relationships between adult's social care and housing were evident with staff working at the front door working closely with tenancy support officers and repairs colleagues.

Mental Health Social Care

South London and Maudsley NHS Mental Health Trust (SLAM) deliver Approved Mental Health Professional (AMHP) and mental health social care service provision via a Section 75 arrangement which has been in place since 2003. Other than the Croydon Integrated Adults Placement and Review Team there is no dedicated mental health social care service within SLAM. From undertaking the case file audits and meeting several mental health social workers and managers employed under the Section 75 arrangements it seemed that mental health social workers and managers had become primarily clinical practitioners and appeared to be led by the medical model rather than the psychosocial model of care and support. Questions were also raised by the peer team as to whether there was a possible dilution of basic social work

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practise which may be resulting in mental health social care no longer being equitable with other client groups across adult social care in terms of quality and service delivery because of possible social work role drift, and a lack of social work identity.

Section 9 and 10 Care Act needs and carers assessments (and associated support plans and risk assessments) are recorded on SLAMs database and not migrated to the adult social care data base LAS, resulting in adult social care having no formal oversight. This is important in times of crisis, especially out of hours given the adult social care emergency duty services do not have access to the Trust's database. Furthermore, mental health social care practitioners working within SLAM are not using adult social cares 'good conversation' approach or templates resulting in an inconsistency in service delivery.

Needs assessments appeared to only being conducted when an individual required a funded package of care or residential/nursing placement, which is contrary to the Care Act, which mandates that an individual with 'an appearance of need' should be offered a 'proportionate' assessment of their needs. There was also no evidence that needs assessments, eligibility documents and support plans were being sent to the individual. The Care and Support Statutory Guidance is unequivocal in its requirement that all adults and carers who undergo an assessment/review be provided with a copy which should clearly indicate the eligibility outcome and, if necessary, include the agreed support plan.

With regards to governance and quality assurance of Section 75 arrangements, there is a lack of quality assurance and governance frameworks in place with no formalised mental health social care outcome focused key performance indicators (KPIs) in place. The peer team suggests the use of the Care Quality Commission nine 'we' quality statements (for adult social care assessment) as KPIs, which will provide evidence that the Councils statutory duties under Part I of the Care Act are being delivered under current Section 75 arrangements.





The adult social care leadership team expressed their concerns regarding the current mental health social care arrangements which has resulted in the mental health social care offer being recorded on the adult social care risk register. Commissioners have commenced discussions with SLAM and the Council plan undertake a full review of current arrangements.

Approved Mental Health Professional Service

The AMHP service is currently staffed by a duty rota of only 2.5 fte AMHPs that work office hours and 4fte AMHPs working out of hours with an office based 1fte AMHP Lead. The model utilised is a Hub and Spoke model meaning that a duty rota is in place and staffed with AMHPs who hold substantive positions throughout the adult social care and mental health services. All AMHP approvals, re-approvals and authorisations are signed off by the DASS.

AMHP Mental Health Act assessment reports, case recording and risk assessments are currently recorded on the SLAM database and not saved or migrated to LAS as is the case with needs assessments and reviews. It is strongly suggested that the Council reevaluate this current practice and consider that all AMHP reports and associated case notes and risk assessments are recorded onto LAS given that AMHP functions cannot be delegated under a Section 75 arrangement and the overall duty to provide sufficient AMHPS and their statutory functions lie with the local authority under the Mental Health Act 1983 (as amended, 2007). In addition, the Council should request a copy of the current AMHP register from SLAM, which all local authorities should hold, which contains the names of AMHPs, dates they were approved to act as AMHP and date approval expires along with evidence that 18 hours of training per annum related to AMHP practice has been undertaken by each AMHP on the register.

There was limited evidence of AMHP performance KPIs and no indication of routine quality assurance of AMHP reports and practice. As such the Council may wish to consider adopting the national AMHP Service Standards(<u>LINK</u>) which would ensure consistent practice and robust AMHP procedures as well as governance and quality





assurance arrangements that should produce reportable data that could be utilised to review current practice/processes and identify where there are areas of challenge.

Theme 3: Ensuring Safety

Quality Statement 6: Safe Systems, Pathways and Transitions

Strengths

Preparing for Adulthood, Transitions and Complex Care Pathway

Historically, the Transition Service maintained a waiting list of more than 200 cases. However, since the service has moved from children's social care to adult social care a remarkable improvement has been achieved with now only 4 new cases awaiting allocation. In, addition a historic large overspend has also been significantly reduced.

To date, everyone over seventeen has been allocated, with evidence of close collaboration with children's services. The transfer of notes from Child Learning Disability Services (CLS) to the Local Authority Service (LAS) is executed seamlessly, ensuring a confident care system transfer. A recent task and finish group identified the need for improvement, particularly addressing parental anxiety from age 14 onward. Data sets are now in place which enable the service to reliably forecast demand. Case load management varied based on the complexity of cases, with an average of 25 to 28 cases which is within best practice guidelines.

The Council takes pride in being proactive in jointly funding complex cases, with coproduction with young adults and their parents/carers being a key priority for the service. Active Lives a learning disability and autism service supports the transition of adults, recognising the increasing complexity of individuals coming through the system. The service offers valuable training, such as Positive Behavioural Support training, which has received positive feedback.

Safeguarding Adults Reviews (SARs)





Independent SAR authors are commissioned via the Croydon Safeguarding Adults Board (CSAB) and complete reports using the CSAB report template to ensure consistency. A progress tracker table is in place that monitors the progress of SARS which is shared amongst all agencies. Recommendations from SARS are audited every six to twelve months to ensure that actions have been implemented and outcomes achieved. Reoccurring SAR themes are addressed via multi-agency training and learning events as well as three-minute briefings.

CSAB Maturity and Partnership Working

The CSAB has an independent chair in place who is an ex-police officer and there is senior representation from adult social care, police, health, ICB, fire brigade, ambulance service and a person with a lived experience. Regular executive partner meetings are held between the CSAB chair, the chair of Croydon Safeguarding Children Partnership, the DASS and the chair of the Croydon Community Safety Partnership.

CSAB Safeguarding Literature, Policy and Procedures

A 'Keeping You Safe' presentation which was collaboratively created with individuals with lived experience and carers has been shared extensively across the local community through roadshows and targeting various groups such as the Asian resource centre, the BME forum, memory clinics, and Mind groups. It is worth noting that the presentation was tailored to suit the specific needs of each audience.

A comprehensive multi-agency transitional safeguarding process has been established, and a preliminary policy has been created, albeit pending approval.

The Council are in the process of drafting a PiPoT multi-agency process and procedure which will go to the CSAB for partnership signoff.

Considerations

Risk and Vulnerability Management Panel





A Risk and Vulnerability Management Panel is in place that meets monthly and is attended by staff from the adult social care front door, police, domestic violence workers, anti-social behaviour workers, housing and fire brigade. However, practitioners and managers found it difficult to articulate the purpose and function of this panel and whether it was a strategic or operational panel. The Council may wish to consider a review of the panel's terms of reference to ensure the panel has a clear objective and staff across adult social care are clear of its purpose.

CSAB Annual Report

During the peer session with the CSAB the peer team were informed that an annual report and business plan was in place that had been coproduced with one person with lived experience. However, on reviewing the CSAB website no publication was found. It is recommended that the strategic plan is published on the CSAB website given that Section 43 of the Care Act 2014, states that each Local Authority is required to establish a Safeguarding Adults Board for their area and must also publish an annual report setting out details of what it has done to achieve objectives within its strategic plan and steps taken to implement the learning from any Safeguarding Adults Reviews undertaken during the period.

In future the CSAB may wish would consider implementing a lived experience and carers focus group or workshops to support with the development of the CSAB annual plan and forward strategic priorities.

CSAB Partnership Safeguarding Outcomes

Partnership safeguarding key performance indicators (KPIs) are in place, however the peer team found these to be focused on outputs rather than the outcomes experienced by adults involved in safeguarding intervention. In addition, the peer team were informed that the CSAB often experiences difficulties in accessing data from the police and health partners as well as issues regarding the quality of data received. However, the Council was stated to be excellent at providing good quality data to the CSAB.



The CSAB may wish to consider implementation of the National Safeguarding Standards which includes a set of outcome focused standards for SABs as their outcome focused KPIs.

Quality Statement 7: Safeguarding

Strengths

Despite continued safeguarding demand at the front door there was evidence of robust triaging of safeguarding concerns against the three stage statutory test. In addition, all staff across adult social care have to complete mandatory safeguarding training, including how to conduct a safeguarding enquiry ensuring that making safeguarding personal principles and approaches are adopted.

Considerations

Section 42 (1) and (2) Process

The Council has implemented an online safeguarding portal, allowing professionals and the general public to report any concerns regarding safeguarding. The management of this portal is overseen by the adult social care front door.

Unfortunately, despite extensive efforts by the peer team to understand the operational safeguarding model the process remained unclear. However, the DASS and leadership team are well aware of the challenges and as such a Head of Safeguarding has been recently appointed, whose responsibility includes evaluating the existing safeguarding pathways and processes at the front door, as well as throughout the adult social care and health system and to adopt new and sustainable ways of working in regards to safeguarding.

Section 75 Safeguarding Processes

Responsibility for the safeguarding of working age adults who are under the care of community mental health services sits with SLAM under Section 75 arrangements. Recording of safeguarding concerns and enquiries and related case notes and risk



assessments are all recorded on the health database which adult social care do not have access to.

SLAM have adopted an alternative documented format for the triaging of safeguarding concerns and completion of safeguarding enquiries rather than using the Councils' documented reports held in LAS. This has resulted in a lack of continuity in both safeguarding practice and process. In addition, there are no shared care records in place and no arrangement for read-only access to each organisation's databases which would support comprehensive risk assessment and management. It may be prudent of the Council and SLAM to consider in partnership, implementation of a shared record or read-only access of each organisation's databases to ensure each organisation has access to an adult's full history and customer journey.

The peer team could not locate any reporting data regarding waiting lists, such as the quantity of safeguarding concerns awaiting triage, safeguarding enquiries awaiting allocation, or safeguarding enquiries that have been open for over three months. Without this data the Council cannot be confident that the discharging of their safeguarding statutory duties under the Care Act are being delivered in a timely, safe and effective manner by SLAM. Given the Council remain responsible for the oversight, quality assurance and management of Section 42 safeguarding activity under the Care Act, it is crucial that they have both data and robust quality assurance measures in place.

Theme 4: Leadership

Quality Statement 8: Governance, Management and Sustainability

Strengths

Council Corporate Vision and Strategy

A Mayors Business Plan 2022 to 2026 clearly sets out the Mayor's vision for Croydon over the next four years. The plan focuses on five areas of which the role of adult social

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care is one. Improved outcomes and the safeguarding of adults with care and support needs, children and young adults are a clear objective of the Mayors plan as well as restoring pride in the borough.

The DASS has a corporate voice which is heard and listened to at the corporate top table. There is a close working relationship between the Mayor, Lead Cabinet Member for Health and Social Care, the DASS and the adult social care leadership team. The Mayor attends six weekly meetings with the adult social care directorate leadership team and the Lead Cabinet Member for Health and Adult Social Care meets weekly with the DASS with a focus on ensuring required governance is in place across adult social care. Additionally, there is a Mayoral Advisory Board weekly, which was describe as a 'safe space' for the DASS and Corporate Management Team (CMT) members, where critical challenge can take place which evidenced robust governance and oversight of strategic operations.

Those spoken to in the CMT conveyed a resilient CMT in which the Council tends to approach challenges from a corporate standpoint. The Chief Executive has prioritised building a strong CMT and closer working with strategic key partners across the integrated Care System. CMT work as one collective unit and as a Council know themselves very well, both in terms of what they do well, where they have challenges and the journey, they need travel to get to where they want to be, *"we own our past, but it does not define us or where we are going."*

Adult Social Care Vision and Strategy

The DASS knows the needs of the local community well and possesses a robust vision for adult social care that is focused on early intervention and prevention, which is reinforced by the Adult Social Care and Health Strategy 2021/25 (recently refreshed in 2022). The DASS, supported by a strong and skilled adult social care leadership team know themselves well and clearly articulated to the peer team the areas of challenge, gaps, improvements and support required. There are comprehensive and realistic transformation and improvement plans in place which along with the adult social care





and health strategy are monitored regularly and seen as living documents. Adult social care practitioners and managers expressed enthusiasm and passion for continued positive change to ensure the best possible outcomes for the residents of the Croydon.

Visible Leadership

The DASS and adult social care leadership are clearly visible and approachable. Staff reported feeling 'listened to' by the DASS and leadership team and it was apparent that managers and practitioners held the DASS and leadership team in high regard. Heads of Service are proud that many of them have remained despite three Section 114 notices and COVID and see improving adult social care services for the residents of Croydon as their collective responsibility. Front-line practitioners reported that their managers were 'accessible and supportive' with an 'open door' policy in place.

Corporate and Adult Social Care Risk Registers

A comprehensive Adult Social Care Risk Register is in place which consists of current risks across the adult social care and health directorate along with risk mitigation plans. The register undergoes regular scrutiny by the adult social care leadership and CMT with plans and outcomes updated.

Considerations

Performance and Intelligent Use of Data Reporting

The Performance Board is chaired by the DASS and performance leads meet with the DASS fortnightly to look at performance indicators in the Mayor's plan. There is a lack of real time accessible data dashboards and currently, reports are produced weekly with snapshots of data. Some data information is available from spreadsheets that feed Power BI reports that can be used to self-serve such as provider activity. Although some managers reports are available these are not actively being used by managers as managers reported they were not as user friendly as the weekly snapshot. However, an adult social care dashboard is in development which will provide a range of real time information, for example, how many people are in residential care, what are the





committed costs, waiting lists etc. Although adult social care is beginning to feel more confident about the accuracy of their data, and there is indeed evidence of green shoots, data maturity and confidence has not yet been achieved.

Quality Assurance and Practice Audits

A Quality Assurance Framework (QAF) has recently introduced (September 2023) across the adult social care and health directorate. Although green shoots were identified the new approach to quality assurance and regular audits will take time to embed. An audit tool has been developed based on the Principal Social Worker (PSW) Network Audit Tool which the PSW has customised to make it more accessible and less time consuming to use. Presently, the audit process pertains exclusively to closed cases; however, by 2024, a plan is in place to extend the audit scope to encompass open cases. This expansion will allow timely intervention while the case remains active.

The adult social care leadership team acknowledges that implementing the new auditing procedure is an integral component of a transformative cultural shift within the directorate that must be undertaken to establish a routine auditing practice. The Quality Improvement Board, led by the DASS, is reaffirming the requirement and importance of regular audit returns to maintain an ongoing level of oversight over the quality of practice, performance, and service delivery.

Scrutiny and Health and Wellbeing Boards

Conflicting perspectives were heard regarding the effectiveness of the Scrutiny Board with some members believing the board to be effectively conducting a significant function in supporting and improving the adult social care agenda whilst others felt that corporate systems and processes were complex and that it was time to move away from this level of governance and have faith in adult social care given the journey they have been on over the last two years and the significant improvements they have accomplished.





The Local Government Association (LGA) is currently supporting the redesign of the Health and Wellbeing Board function and delivery and a cross party workshop is in the process of being planned. Healthwatch (who are represented on both Scrutiny and Health and Wellbeing Board and have voting rights for the latter) reported how they are welcomed onto other Council committees and boards and feel through this they do have a local line of sight in representing resident views. More recently they have been commissioned to bring the resident voice into the refresh of the Health and Care Strategy. However, they reported that Councillors needed to do more than attend meetings and should be proactively reaching out into their local communities via a programme of visits. The NHS reported that although the intent of both Scrutiny and the Health Wellbeing Board is good agendas do not always feel as clear as they could be.

Quality Statement 9: Learning, Improvement and Innovation

Strengths

Feedback is Acted on and Used to Drive Improvements

The Adult Social Care and Health Improvement Board, oversees and drives the continued improvement of the Directorate's services, ensuring that improvements embedded across the service are sustained and progress is made in areas that still require improvement.

There is a shared awareness that customer satisfaction is not optimal across the directorate and as such the directorate is proactively seeking feedback and exploring initiatives such as self-addressed postcards, visits to the Carers Centre and Age UK to garner insights and opinions from service users.

The Voice of Residents and Coproduction Arrangements

Much work has been done around pathway mapping with the aim of always keeping the Croydon resident at the heart of everything that takes place. It is recognised by senior leaders that as a result of the challenging financial situation the Council needs

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to not only rebuild trust with the community but also actively listen and act on the community voice.

To promote the voice of the local community numerous boards across the Council have representation from residents who draw on services and carers, such as the Managing Demand Board, the CSAB and the Scrutiny and Health and Wellbeing Boards. There is also significant evidence of coproduction work taking place in commissioning especially regarding homecare.

Dedicated, Skilled and Knowledgeable Workforce

The Councils adult social care workforce are skilled, knowledgeable, passionate and committed to the residents of Croydon. There is a distinctive academic and research culture across the directorate. The Council use a central recruitment model and there was significant evidence that they are an inclusive employer.

There is a robust training offer that includes Care Act, legal literacy, safeguarding, mental capacity and DoLS training to name but a few. This was supported by numerous accounts from staff of a robust training and development package, with one staff member stating, *"we have a really good academic culture, you are supported to develop professionally."* A learning and development matrix for staff across all roles has been developed to ensure that managers are aware of the training requirements for all their staff. There are also a number of subject matter experts across the directorate who provide in house training. Two new social work practise leads will shortly be recruited to help support with targeted learning and development interventions across the directorate which includes those adult social care managers and practitioners working in integrated teams and within community mental health settings.

Due to the limited resource in the Learning and Development Team it is not possible to report on individual staff training undertaken. The peer team recommend that this position is reviewed by the adult social care leadership team given that CQC will request a list of all training undertaken by the adult social care workforce.



To support consistent practice and process across the directorate all policies, procedures and practice guidance is managed with Tri-X a web-based database that is accessible and updated on a regular basis.

In terms of registration for Social Work England, the PSW has negotiated four days protected time for social workers to undertake Continuing Professional Development (CPD) activity with a support programme in place. In addition, the newly appointed Principal Occupational Therapist is developing something similar for occupational therapists.

ASYE and Apprentices

The Assessed and Supported Year in Employment (ASYE) programme was perceived as supportive with a reported culture of learning and that the PSW was highly accessible, providing workshops and support. The buddy system within teams was commended, but challenges surfaced when individuals sought opportunities to shadow different teams.

Role of the Principal Social Worker

The PSW not only has a direct line of sight to the DASS but also plays a crucial and enthusiastic role as a senior leadership team member. Having held the position for only a year, the PSW has developed a 100-day report highlighting deficiencies in supervision, quality assurance, and concerns about the dilution of social work practice of Council staff working in community mental health settings under Section 75 agreements. With regards to each of these areas (other than the dilution of social work practice) the PSW has implemented solutions to improve quality assurance and move practice forward. Furthermore, the PSW has introduced the adult social care Excellence Awards which is seen as a very positive way to improve morale and motivate staff.

Considerations

Staff Wellbeing and Culture

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The wellbeing of staff (regarding low staff morale) was raised as an issue by a number of managers and practitioners who stated that high caseloads and waiting lists create anxiety and impact upon their wellbeing. The Registered Social Workers Health Check Report 2022 reported a wellbeing rate of 75%, however, only thirty registered social workers responded to the survey meaning that this outcome cannot be generalised across the directorate due to the low response rate.

In contrast the peer team heard reports of staff feeling 'valued' and their 'professional opinions listened to' and that there had been a positive cultural change over the last two years, with practice now being driven by the PSW. In addition, the Practitioner Forum, which has a direct line of access to the DASS was highly valued by practitioners. One practitioner stated, *"it is very different to place to three years ago, the culture was negative, and everyone was leaving, but now managers and leaders have an open-door policy, which makes you feel like you belong".*

Examples, were shared, illustrating instances where apprentices and students chose to remain in Croydon, attesting to the dedication of the workforce. Despite the challenges over recent years, practitioners conveyed a strong sense of commitment and spoke highly of their managers, underscoring the overall dedication and resilience of the workforce. Numerous testimonies from staff were heard, reporting how they felt supported by their line managers and senior leadership team. Many staff spoken to had a proactive attitude to overcoming challenges and taking a partnership approach to achieve best outcomes which should be commended.

Supervision

In early 2023 the PSW sent out supervision questionnaires across the adult social care and health directorate. A thematic analysis of responses highlighted that not all staff were in receipt of regular monthly supervision and some staff had not received supervision at all. As a result, in September 2023 the newly developed Supervision Framework was implemented across the directorate, along with a two-day mandatory two-day training course and regular supervision casefile audits. The adult social care



leadership may wish to assure themselves that regular supervision is now taking place by way of an anonymous survey and further supervision casefile audits.

Case File Audit Findings

The peer team considered 12 cases in the audit and a further 5 cases that had been audited and reaudited using the Customer Journey Case Tracking Audit Tool.

Strengths

- In 76% of cases responses were timely and met with local requirements
- In 92% of cases local policies and procedures had been followed, i.e. safeguarding policies, MCA etc. either fully or partially (67% fully and 25% partially.
- In 92% of cases information had been shared appropriately between agencies
- In 93% of cases all entries were clear, eligible and dated.

Considerations

- In 58% of cases positive outcomes from interventions had not been recorded as achieved
- In 58% of cases progress against the outcomes had not been recorded
- In 50% of cases there was partial evidence of analysis and critical thinking

Immediate Next Steps

We appreciate the senior political and managerial leadership will want to reflect on these findings and suggestions to determine how the organisation wishes to take things forward.

Whilst it is not mandatory for the Council to publish their report, we encourage Councils to do so in the interests of transparency and supporting improvement in the

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wider sector. If the Council does decide to publish their report, the date at which the Council chooses to do so is entirely at their discretion and would usually be at the culmination of an internal governance process.

As part of the peer challenge process, there is an offer of further activity to support this. The LGA is well placed to provide additional support, advice, and guidance on several of the areas for development and improvement and we would be happy to discuss this.

Kate Herbert is the main contact between your authority and the Local Government Association. Their contact details are:

Email: kate.herbert@local.gov.uk

Telephone: 07867 632404

Steve Tingle is the LGA Care and Health Improvement Adviser for the London region. Their contact details are:

Email: <u>Steve.Tingle@local.gov.uk</u>

Telephone: 020 3838 4854

Peer Challenge Manager and Author, Abbie Murr

Email: abbiemurr@achievehealthsocialcare.co.uk

Contact Details

For more information about the Adult Social Care Preparation for Assurance Peer Challenge at Croydon Council please contact:

Marcus Coulson Senior Advisor – Adults Peer Challenge Programme Local Government Association Email: marcus.coulson@local.gov.uk

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Tel: 07766 252 853

For more information on the peer challenges and the work of the Local Government Association please see our website: <u>Council improvement and peer support | Local</u> <u>Government Association</u>



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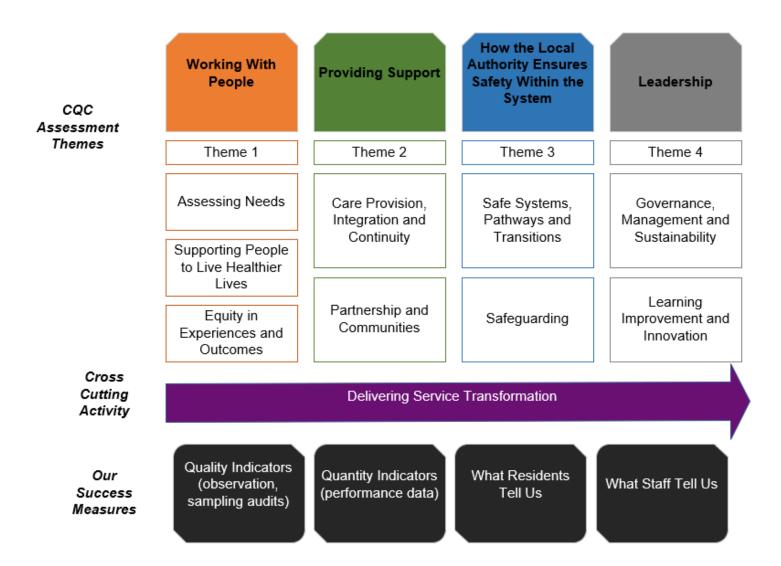
Adult Social Care & Health Assurance Improvement Plan

CROYDON www.croydon.gov.uk

ADULT SOCIAL CARE & HEALH ASSURANCE IMPROVEMENT PLAN

ADULT SOCIAL CARE & HEALTH ASSURANCE IMPROVEMENT PLAN ON A PAGE

The Adult Social Care & Health Assurance Improvement Plan is structured around the 4 CQC assessment themes as set out below



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ADULT SOCIAL CARE & HEALH ASSURANCE IMPROVEMENT PLAN

Ref	Priorities and key activity	By when	Status	Success Measures (Impact for residents and what good looks like)
2	Continually improve practice across the directorate . This includes activity to:	July 2024		 ✓ Improved quality of care and support for residents, medication management is improved, a sense of community is enhanced,
	1.1 Review the good conversation record to identify required improvements to support good quality, legally literate practice.	June 2024		and practitioners have the time and resources to focus on their needs.
	1.2 Improve communication and sharing of information with residents and carers.	July 2024		
	 Review, re-establish and strengthen our vision for Community Led Support and strength-based approaches. 	June 2024		
	1.4 Review caseload weighting tool to ensure caseloads are reviewed and weighted based on the complexity of the case.	April 2024		
	Continually improve practice mental health. This includes activity to:	September 2024		✓ A more consistent and effective communication between reside and practitioners from the Local Authority and SLAM improving the overall quality of care.
				 Mental Health practitioners can provide better care to residents leading to improved outcomes such as reduced hospital admissions, improved quality of life, and increased access to appropriate services.
	2.1 Review the Adult Social Care and Health case management system (LAS) to ensure that Mental Health records including, Approved Mental Health Practitioner assessment reports, case notes and risk assessments can be recorded.			

Ref	Priorities and key activity	By when	Status	Success Measures (Impact for residents and what good looks like)
	2.2 Mental Health Practioners to use ASCH templates for good conversations and risk assessments.	September 2024		
	2.3 Review the AMHP arrival pathway, approval, reapproval and authorisation procedures.	June 2024		
3	Develop the early intervention and prevention offer in partnership with Public Health	July 2024		✓ Identifying health inequalities and gaps in service provision, which can be addressed through targeted interventions.
				 Improve health outcomes and reduce disparities.
4	Minimise and monitor waiting list and waiting times. This includes activity to:	September 2025		 Residents will receive the care and support they need in a timely manner, reducing the risk of health complications and ensuring that they can maintain their independence and dignity.
	4.1 Recruit Occupational Therapist's to support preventative work at the front door to minimise numbers on the waiting list.	June 2024		
	4.2 Develop a portal for referrals for the Occupational Therapy Service.	March 2024		
	4.3 Ensure that all residents on the waiting list (including safeguarding) have an up-to-date risk assessment and risk mitigation plan.	September 2024		

Ref	Priorities and key activity	By when	Status	Success Measures (Impact for residents and what good looks like)
5	Review carer assessment and support approaches. This includes activity to:	October 2024		 Increased satisfaction among carers with the support they receive and reduction in the number of carers reporting feelings of stress or burnout.
6	5.1 Review the carers strategy and respite/replacement care demand.	October 2024		 Increased uptake of support services, such as respite care and training opportunities, by carers.
	5.2 Review the carers good conversation record.	March 2024		✓ Reduced costs to health and social care services, as a result of more effective support for carers and prevention of crisis,
	Work in equal partnership with people who use care and support and improve how we collect and act on feedback. This includes activity to:	June 2024		 Identifying areas for improvement and implementing changes to services based on feedback from people who use care and support.
	6.1 Review the process for capturing resident/carer feedback.	March 2024		✓ Better communication between people who use care and suppor and those who provide it
	6.2 Review and improve how easy it is for residents, carers and providers to contact ASCH by phone.	June 2024		
7	Improve outcomes for people with complex needs. This includes activity to:	October 2024		 ✓ Better health, increased independence, and reduced costs. ✓ Better quality of life for those who require care and support.
	7.1 Develop a pathway for residents with learning disabilities, autism and mental health.	October 2024		
	7.2 Work with partners to set out expectations, roles, responsibilities and commissioning around complex and transforming care.	October 2024		
8	Review of the front door pathway and operating model. This includes activity to:	July 2024		✓ Helps to ensure that people receive the right level of support at the right time leading to earlier identification of needs and more timely interventions.

Ref	Priorities and key activity	By when	Status	Success Measures (Impact for residents and what good looks like)
	8.1 Review the front door assessment criteria, how it is applied and how it affects vulnerable people specifically those with autism/neurodivergent.	May 2024		✓ Better experience for people accessing adult social care services
	8.2 Recruit Mental Health Worker to early intervention.	January 2024		
	8.3 Improve access to information and advice.	March 2024		
9	Significantly increase direct payment take up. This includes activity to:	March 2025		 Empowers residents to have more control over their care arrangements, enabling them to choose services and support th best meet their needs.
	9.1 Explore ways of developing the micro market so that residents have more places to spend their direct payments	May 2024		
10	Improve communication regarding financial assessments. This includes activity to:	June 2024		 ✓ Improved transparency in financial assessments
	10.1 Improve communication regarding financial assessments and charging.	June 2024		 Improved financial planning for social care clients and increased accuracy in assessments.
11	Improve access to technology enabled care and explore innovative TEC approaches. This includes activity to:	October 2024		 Improve access to care for those who may otherwise struggle to access it due to mobility issues, geographical location, or other limitations.
	11.1 Develop the Careline/assistive technology offer.	October 2024		 Enhanced quality of care, social care staff can monitor and respond to the needs of their clients in real-time, ensuring that they receive the care they need when they need it.
	11.2 Review our providers use of digital technology solutions.	May 2024		 Increased efficiency, social care staff manage their workload mo efficiently, reducing waiting times and improving overall service delivery.

Ref	Priorities and key activity	By when	Status	Success Measures (Impact for residents and what good looks like)
12	Strengthen how we understand and tackle inequalities to services. This includes activity to:	September 2024		 ✓ Improved access to social care services for underrepresented and marginalised groups. ✓ Enhanced trust, respect, and goodwill between social care
	12.1 Review equity of access to referral services and identify groups with less access and make plans to improve.	September 2024		 Greater participation and engagement from diverse communities in the development and delivery of social care services.
	12.2 Raise awareness of the Equality Diversion and Inclusion Board and activities.	June 2024		 More targeted and effective interventions to address specific health and social care inequalities.
	12.3 Review levels of recording of protected characteristics on the Adult Social Care and Health recording system (LAS) and implement improvement plan as required.	June 2024		

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22,	Prov	iding Support – Theme 2 (Lead: Head of Adult Pla	cement, Brok	erage and Mar	ket Management)
	Ref	Priorities and key activity	By when	Status	Success Measures (Impact for residents and what good looks like)
	13	Plan to meet future housing/accommodation needs for people who need the support. This includes activity to:	October 2024		 Appropriate and accessible accommodation, promoting independence and increased opportunities for social engagement and community involvement. Access to safe, affordable, and appropriate housing options that
		13.1 Re-procure floating support and enablement service	October 2024		meet unique needs and preferences.
	14	Establish improved process for providers requesting reviews	June 2024		

Ref	Priorities and key activity	By when	Status	Success Measures (Impact for residents and what good looks like)
15	Review and update strategy documents. This includes activity to:	March 2025		 Setting SMART objectives and KPIs to measure success, improving quality of care for residents, prioritising person- centered care, identifying opportunities for innovation and
	15.1 Develop and carry out a Co-production Plan, setting out how co-production will be progressed across all four themes (including the reviews of regulated services).	March 2025		improvement, and ensuring safety and well-being of residents.
16	Improve processes for reablement, intermediate care and hospital discharge including links to services for carers. This includes activity to:	January 2025		 ✓ Residents receive the appropriate level of care and support the need to recover from illnesses or injuries. ✓ Faster recovery times, reducing the risk of readmission, and
				minimised pressure on carers.
	16.1 Review and re-design the hospital discharge pathway.	September 2024		
17	Review approach to continuing health care (CHC)/Joint Funding	September 2024		 Resources are distributed fairly and equitably ensuring that people with the greatest need receive the highest level of support.

Ref	Priorities and key activity	By when	Status	Success Measures (Impact for residents and what good looks like)
8	Continually improve safeguarding practice. This includes activity to:	September 2024		 Effective implementation of safeguarding protocols and compliance with relevant legal and regulatory frameworks.
				 Vulnerable individuals are protected from harm and their welfare is safeguarded effectively.

Ref	Priorities and key activity	By when	Status	Success Measures (Impact for residents and what good looks like)
	18.1 Work with Croydon Safeguarding Adults Board (SAB) to review local arrangements for working with adults with care and support needs who are self-neglecting.	March 2024		
	18. 2 Work with Croydon Safeguarding Adults Board (SAB) to review local arrangements for working with adults with care and support needs who are at risk of Modern Day Slavery.	April 2024	One remaining action to be completed in May	
	18.3 Review barriers to reducing the waiting list for DoLS, including those relating to attracting s12 Doctors and independent DoLS Best Interest Assessors (BIAs).	June 2024		
19	Review safeguarding operating model	June 2024		 ✓ Staff satisfaction with the new operating model and its effectiveness in safeguarding vulnerable adults. ✓ Increase in the proportion of adult safeguarding work that out
				quality assurance auditing rates as 'Good' or 'Outstanding'.
Lead	ership – Theme 4 (Lead: Head of Improvement)			
Ref	Priorities and key activity	By when	Status	Success Measures (Impact for residents and what good looks like)
20	Support and develop the workforce. This includes	October		 Positive feedback from staff regarding training and developm

Ref	Priorities and key activity	By when	Status	Success Measures (Impact for residents and what good looks like)
20	Support and develop the workforce. This includes activity to:	October 2024		 Positive feedback from staff regarding training and development opportunities.
	20.1 Enhance the workforce strategy.	July 2024		 ✓ Improved retention rates among staff.

Ref	Priorities and key activity	By when	Status	Success Measures (Impact for residents and what good looks like)
	20.2 Embed and evidence workforce equality diversity and inclusion (EDI) standards.	October 2024		
	20.3 Identify learning from the assessed and supported year in employment (ASYE) social worker reviews and plans to maintain develop the ASYE programme.	March 2024		
21	Ensure and evidence the best quality outcomes for residents who have care and support needs. This includes activity to:	October 2024		✓ Residents trust and have confidence in the social care and health system.
				 Greater peace of mind for residents and their families.
	21.1 Complete and implement audit programme.	April 2024		 Effective communication and collaboration with other healthcare providers and community organisations to promote holistic care
	21.2 Review the Quality Assurance Framework.	October 2024		

RAG Rating	Description
	Complete
	In Progress
	Issues
	Overdue

Agenda Item 10

LONDON BOROUGH OF CROYDON

REPORT:	CABINET		
DATE OF DECISION	15 MAY 2024		
REPORT TITLE:	Air Quality Delivery Plan 2024-2029		
CORPORATE DIRECTOR / DIRECTOR:	Nick Hibberd, Corporate Director, Sustainable Communities, Regeneration & Economic Recovery		
	Karen Agbabiaka, Director of Streets & Environment		
LEAD OFFICER:	Linda Johnson, Pollution Team Manager		
LEAD MEMBER:	Councillor Scott Roche, Cabinet Member for Streets & Environment		
AUTHORITY TO TAKE DECISION:	Part 3 of the Constitution: The Council has determined that all local choice functions contained in Schedule 2 of The Local Authorities (Functions and Responsibilities) Regulations 2000 except approval of non- executive contracts, are to be Executive functions.		
KEY DECISION?	YES As defined in Article 13.02 (d)(ii) of the Constitution: namely an executive decision, which is likely to be significant in terms of its effects on communities living or working in an area comprising two or more Wards in the Borough. 0124SCRER		
CONTAINS EXEMPT INFORMATION?	No		
WARDS AFFECTED:	All		

1. SUMMARY OF REPORT

- 1.1 As detailed in the report, the Council has a statutory duty to adopt an Air Quality Delivery Plan. This report seeks authority to undertake a statutory consultation on the Council's new draft Air Quality Delivery Plan 2024–2029 and a supporting delegation to the Corporate Director of Sustainable Communities, Regeneration & Economic Recovery.
- 1.2 Since 2002, the whole of Croydon has been designated as an Air Quality Management Area (AQMA). As such the Council has a statutory duty to produce an Air Quality Delivery Plan. Croydon has previously produced four Air Quality Action Plans with the latest ending in 2022.

- 1.3 The Executive Mayor of Croydon's Business Plan 2022–2026 sets out priorities to ensure Croydon is a place of opportunity for business, earning and learning by supporting the regeneration of Croydon's town and district centres through investment and grants, ensuring that Croydon is a cleaner, safer and healthier place, a borough we're proud to call home and that people can lead healthier and independent lives for longer.
- 1.4 The UK has legally binding targets to reduce overall national emissions of five air pollutants (fine particulate matter, ammonia, nitrogen oxides, sulphur dioxide, and non-methane volatile compounds) by 2020 and 2030. The Government has set two further targets for fine particulate matter (PM2.5) in England through The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023 (SI 2023/96). The targets are:
 - An annual mean concentration target a target of 10 micrograms per cubic metre (μgm3) to be met across England by 2040.
 - A population exposure reduction target a 35% reduction in population exposure by 2040 (compared to a base year of 2018).
- 1.5 London Local Air Quality Management (LLAQM) 2019 guidance sets out the process London Councils are required to follow when developing Air Quality Delivery Plans, it sets out in Policy Guidance and Technical Guidance issued by the London Mayor in 2019. The GLA supervises Delivery Plans for Greater London and has been given the powers to intervene and direct boroughs under Part IV of the Environment Act 1995. These policy and technical guidance documents outline changes to the Local Air Quality Management system and include the introduction of an air quality Annual Status Report (ASR) to amalgamate all other reporting requirements.
- 1.6 The Councils' priorities for the draft Air Quality Delivery Plan 2024–2029 are:
 - a) Work towards the 2005 WHO guidelines for $PM_{2.5}$ with a target of compliance deadline by 2030 and review the emerging policies from the GLA in respect of the 2021 WHO guidelines;
 - b) Increase the network of air quality monitoring across the borough;
 - c) Continue to engage schools around whether there is a need to introduce further Croydon Healthy School Streets (this can include traffic calming measures, Air Quality audits and increase of green infrastructure) whilst recognising that such matters also have attendant statutory consultation requirements and procedures which would need to be adhered to and substantiated including on Traffic Management grounds, prior to any introduction.
 - d) NRMM (Non-Road Mobile Machinery), particularly from the construction sector, is a significant contributor to London's air pollution accounting for around seven per cent of NOx and eight per cent of PM10 emissions in London. It is a statutory requirement to undertake regular inspections to ensure compliance - major developments are required to submit a construction logistics plan (CLP) or Construction Environmental management plan (CEMP) prior to commencement;
 - e) As Croydon is an AQMA, new developments should be air quality positive or at least 'air quality neutral';

- f) Continue to raise awareness and encourage behaviour changes through air quality campaigns;
- g) Assess potential impact of intensifying Electric Vehicle Infrastructure;
- Reduce emissions from the burning of non seasoned wood reduce particulate emissions from wood burning in the home via an awareness campaign of appropriate words for burning;
- Assess the wider role of fleet within the services the Council provides to ascertain compatibility with the Council's air quality aims. The Council fleet currently comprises 98 leased vehicles, 54 owned vehicles and 10 short-term hired vehicles. In addition there are many other Council services for which fleet would form part of their provision – i.e. all deliveries of any contractors to the Council, FM Conway (Highways), Veolia (waste and street cleansing), arbo-cultural providers. However, there are major financial implications regarding this action which will need further assessment;
- j) Provide new cycling and walking infrastructure and assess air quality impacts of new infrastructure.
- 1.7 The draft delivery plan sets out how the Council proposes to effectively deliver against the above themes and priorities, thereby improving air quality issues that are within its control and thereby leading by example. However, it is important to recognise that these are local drivers proposed to reduce and tackle air pollution and that air pollution by its very nature is cross boundary.

2. **RECOMMENDATIONS**

The Executive Mayor in Cabinet is recommended, having regard to the equalities impacts and other implications set out in the report and appendices, to:

- 2.1 Approve the commencement of a statutory consultation on the draft Air Quality Delivery Plan 2024-2029 attached at Appendix 1 to this report, for a period of 8 weeks.
- 2.2 Delegate authority to the Corporate Director of Sustainable Communities, Regeneration & Economic Recovery, in consultation with the Executive Mayor and the Cabinet Member for Streets & Environment, to consider the outcome of the statutory consultation on the draft Air Quality Delivery Plan, approve such amendments to the draft Plan as are necessary and approve the final Croydon Air Quality Delivery Plan 2024-2029 for adoption.

3. REASONS FOR RECOMMENDATIONS

- 3.1 As Croydon is an Air Quality Management Area there is a statutory requirement to submit an Air Quality Delivery Plan designed to improve air quality within the area in accordance with statutory requirements, statutory guidance and Mayor of London guidance.
- 3.2 The draft plan has been sent to the GLA twice for comments and amendments were made. Once the draft plan has been agreed by Cabinet the Council will undertake an 8 week consultation on the actions identified within the draft plan.

4. BACKGROUND AND DETAILS

- 4.1 Air quality is an important Public Health issue in London. It contributes to shortening the life expectancy of all Londoners, disproportionately impacting on the most vulnerable.
- 4.2 The whole of Croydon has been designated as an Air Quality Management Area (AQMA) since 2002 due to exceedances of the nitrogen dioxide air quality objective. As such the Council has a statutory requirement to produce an Air Quality Delivery Plan. Croydon has produced four Air Quality Delivery Plans with the last ending in 2022.
- 4.3 The Council must produce an integrated five year action plan to focus on local actions the council can take to reduce emissions and minimise exposure of air pollutants to those who live and work in Croydon.
- 4.4 There is also often a strong correlation with equalities issues because areas with poor air quality are also often the less affluent areas. Air pollution is associated with a number of adverse health impacts. It is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions. The Council is committed to reducing the exposure of people in Croydon to poor air quality in order to improve health.
- 4.5 The aim is to reduce exposure to air pollution and to raise awareness for residents and those who work in Croydon. It has been estimated that up to 40% of pollution in Croydon is from outside London and Europe therefore actions to reduce pollution in Croydon are limited. Engagement with residents and businesses is required to reduce exposure to air pollution and to raise awareness to change behaviour by encouraging people to walk and cycle more.
- 4.6 The agreed Actions within the final Plan as adopted, will be delivered across the life of the plan (2024-2029). Much of the work is subject to funding being available and it is known that resources across the Council are limited. Some of the proposed actions will be delivered within existing budgets by officers. However, some of the actions require funding which will potentially be sourced from:
 - Planning Section 106 Obligations (air quality, transport and public health)
 - Local Implementation Plan (transport related measures)
 - Mayors' Air Quality Fund (MAQS)
 - DEFRA air quality grant
 - Public Health funding

Where possible, available funding streams will be pooled.

- 4.7 The aim of the new Air Quality Action Plan is to have an integrated approach to include Transport and Public Health measures. Some of the actions will be building on existing successful actions and some are new. The key priorities considered are detailed in paragraph 1.6 above.
- 4.8 The Council is committed to providing clear and strong leadership in Croydon. The Council will explore a wide ranging set of options, via the forthcoming consultation exercise, which will be reflected in the new Air Quality Delivery Plan.

- 4.9 Air Quality in Croydon was discussed at the Streets & Environment Scrutiny Sub-Committee on 1 November 2023 and 2 April 2024 for pre-decision scrutiny. Initial ideas for the above priorities were discussed and also further information regarding funding of these priorities were provided. The recommendations made by the scrutiny committee are detailed more fully in section 6 below and will be considered and reflected as appropriate in the plan as adopted.
- 4.10 Croydon Council cannot develop this plan in isolation and the Council will need the active support and participation of residents, businesses and partners if it is to succeed in improving air quality in our borough.
- 4.11 Croydon Council will work closely with the GLA to formulate its final plan. The recommendations made following on from discussions with the GLA, are included in the proposed draft plan for consultation, Appendix 1. They related to including KPI's within the action plan to monitor delivery and initial suggestions as to KPI's are included and these will be further developed as part of the statutory consultation to be included in the final Air Quality Delivery Plan.

5. ALTERNATIVE OPTIONS CONSIDERED

The requirement for the Air Quality Delivery Plan is detailed in the Legal Implications Section of this report.

6. CONSULTATION

- 6.1 As detailed at 4.9 above, the draft Air Quality Delivery Plan 2024-2029 has been before the Streets & Environment Scrutiny Sub Committee on 1 November 2023 and 2 April 2024 and was rigorously analysed and discussed by the sub committee at those two meetings. The recommendations from the committee following the meeting on 2 April 2024 were as follows:
 - The Council further consider the roles that Biodiversity Net Gain and Urban Greening could have as part of the Air Quality Delivery Plan 2024-29.
 - Officers work with the Planning department to see what conditions around air quality could be developed for use with future developments. Officers have responded to this by ensuring that the draft review of the local plan includes that all new developments should be air quality positive or at least 'air quality neutral'.
 - Officers consider what air quality initiatives could be embedded in the Local Plan around specific construction techniques, which could promote better air quality.

The above recommendations pertaining to biodiversity link into other supporting plans which the council has in place, including the Carbon Neutral Plan, adopted in 2022 and the Habitat Action Plan (Biodiversity Plan) which is still being developed and will cover various chalk grasslands, heathland, woodlands and hedgerows, cemeteries and churchyards and other open spaces. These supporting plans will be considered as part of the consultation on and adoption of any final AQDP. In addition, a number of the actions in the Air Quality Delivery Plan (Appendix One) require Pollution Team officers to collaborate with Planning colleagues to achieve outcomes.

- 6.2 Boroughs are required to submit their draft Delivery Plans to the GLA twice. It should be submitted before the public consultation and again afterwards. The final version of the Delivery Plan should only be approved by the Executive and published once the GLA has provided formal agreement of the document.
- 6.3 When carrying out their Part IV functions, Schedule 11 of the Environment Act 1995 requires consultation with a range of persons and organisations. The Mayor of London is the key statutory consultee and will need to approve final AQDPs prior to publication. In developing/updating the delivery plan the Council will consult with other local authorities, agencies, businesses and the local community to improve local air quality. Schedule 11 requires local authorities to consult the bodies listed below:
 - The Secretary of State
 - The Environment Agency
 - Transport for London and the Mayor of London (joint response)
 - All neighbouring local authorities
 - Other public authorities as appropriate

In addition consultation will be undertaken via:

- Croydon's Air Quality Steering group*
- Public notices in council offices
- Council Communications Team
- Public Health

- Bodies representing local business interests and other organisations as appropriate
- Residents and businesses eg. Residents' Associations and local BID's
- Imperial College Environmental Research Groups
- Local community groups
- Mums for Lungs local representative

*Croydon's Steering Group has met regularly with senior officers from the following teams recruited into the group's regular membership:

- Environmental Health, Trading Standards and Licensing
- Public Health
- Strategic Transport

- Strategic Planning
- Highways
- Climate Change
- Independent Travel

Other services/teams will be invited to the Air Quality Delivery Plan Group meetings when items relevant to their delivery responsibilities are placed on the agenda. This includes:

- Parking Services
- Parks
- Ecology & Trees
- Development Control
- Children's Services & Educational Development
- Housing Services
- Fleet Management
- Communications Team
- Procurement
- Legal Services
- 6.4 The updated Steering Group will be chaired by the Director of Streets and Environment to provide strategic direction, guidance and oversight to determine the priorities associated with the AQDP 2024-2029.

The final Air Quality Delivery Plan will include:

- Details of which pollutants the authority will be taking action on, and an indication of the pollutant emission source(s);
- What other local authorities are doing or will need to do to meet the action plan's objectives;
- The timescales for implementing each proposed measure and the emissions (and concentration, if possible) reductions expected by the end of the relevant review and assessment round as detailed in the London Local Air Quality Management (LLAQM) Technical Guidance 2019 (LLAQM.TG (19); and
- Details of other individuals, bodies or agencies whose involvement is needed to meet the plan's objectives and what the authority is doing to encourage their co-operation.
- 6.5 In addition to the above the Council proposes to engage with the public to garner their ideas on how it can best tackle this issue. Many of the ideas are likely to include the need for people to change their current behaviour so it is important that the Council understands how it can best support and achieve this.
- 6.6 Secretary of State guidance indicates that whilst Local Authorities should decide the timescale for consultation, the recommendation is that the consultation exercise should take place over an eight to twelve week period. An 8 week consultation period is proposed for the Council's draft AQDP.
- 6.7 The final AQDP will be completed following the consultation process. Should significant revision of the document be required time must be factored in to complete the action plan. It is recommended that the Corporate Director of Sustainable Communities, Regeneration and Economic Recovery be given delegated authority to consider the outcome of the statutory consultation and, in consultation with The Executive Mayor of Croydon and the Cabinet Member for Streets & Environment, to make a decision as to whether to amend/update and then approve the final Croydon Air Quality Delivery Plan 2024-2029 for adoption.

7. CONTRIBUTION TO EXECUTIVE MAYOR'S BUSINESS PLAN

7.1 The Executive Mayor of Croydon's priorities are detailed in the Corporate Plan and highlight which outcomes the report and decision relate to: <u>Mayor's Business Plan 2022 - 2026 (croydon.gov.uk)</u>

8. IMPLICATIONS

8.1 FINANCIAL IMPLICATIONS

8.1.1 Revenue and Capital consequences of report recommendation

Current Year	Medium Term Financial Strategy – 3 year forecast		tegy – 3 year
		2025/26 £'000	2026/27

Revenue				
Budget				
Available				
Expenditure	530	530	530	530
Income	0	0	0	0
Income	0			0
Effect of				
decision				
from report				
Expenditure	0	0	0	0
Income	0	0	0	0
	530	530	530	530
Budget				
Capital				
Budget				
available				
Expenditure	0	0	0	0
Income	0	0	0	0
Income	0	U	U	0
Effect of				
decision				
from report				
Expenditure	0	0	0	0
Income	0	0	0	0
			-	
Remaining	0	0	0	0
Budget				

8.1.2 The Effect of the Decision

At this stage there is no impact on existing budgets and any additional work will not be undertaken until funding is secured. The revenue budget in the table above relates to the staffing and supplies costs of the Pollution Team within the Environmental Health, Trading Standards and Licensing service. Delivery of the Air Quality Delivery Plan is one of the functions of the Pollution Team, with only a small percentage of the budget allocated to the Delivery Plan, with the majority of funding secured from alternative sources. Spend will be committed once consultation on the proposed plan has been completed.

This report has minimal direct financial impact on existing revenue budgets. Following the completion of the consultation on the draft Air Quality Delivery Plan 2024–2029, funding will be sought from a number of sources including S106, CIL, Mayors' Air Quality Fund, DEFRA air quality grant and Public Health Grants.

8.1.3 Financial Risks

There is a risk that if this report is not approved, there will be no funding secured to improve Air Quality, which will have financial consequences within the public health and social care budgets over a number of years.

8.1.4 Future Savings Efficiencies

Although there are not expected to be future savings and efficiencies within the Pollution teams' revenue budget, improved air quality could result in efficiency savings in other Council departments, for example public health. As a result of improved air quality and therefore, the improved health of residents within the borough. Additionally external funding will be sourced where possible for any work needed to reduce the cost against the revenue budget.

8.1.5 Comments approved by: Darrell Jones, Acting Head of Finance on behalf of the Director of Finance & Deputy S151 Officer – date 27th March 2024.

8.2 LEGAL IMPLICATIONS

- The Environment Act 2021 ("the 2021 Act", Part 4), the Environment Act 1995 ("the 8.2.1 1995 Act"), the Clean Air Act 1993 and the Environmental Protection Act 1990 establish frameworks for local authorities to address air quality. The basic statutory framework is put in place for local air quality management by Part IV of the Environment Act 1995, (as amended, and "Part IV functions" of this Act) and national air quality regulations. This remains in place and is applicable to London's 32 boroughs. However, it was agreed with the Department for the Environment Food and Rural Affairs (DEFRA) in 2016 that the relevant local air quality management policy guidance for London should be different from that in the rest of the country in recognition of the particular challenges London faces. DEFRA have agreed that policy guidance for London should be issued by the Mayor, in recognition of his London-wide supervisory role. This reflects the Secretary of State's own statutory guidance. As a result, London boroughs need to refer to the London Local Air Quality Management (LLAQM) policy document issued in 2019, the accompanying LLAQM Technical Guidance, 2019 and the LLAQM Borough Air Quality Action Matrix, 2019 as issued by the Mayor and updated from time to time, rather than national guidance issued by DEFRA in reflecting whether or not the Council is in compliance.
- 8.2.2 Boroughs have a duty under Section 83(1) of the 1995 Act to designate areas as Air Quality Management Areas (AQMA's) where air quality objectives are not being met, or are shown to be likely at risk of not being met, and where people are likely to be regularly present. As detailed earlier in the report, the entire London Borough of Croydon has been declared an AQMA.
- 8.2.3 When an AQMA has been designated, section 84 (2) of the 1995 Act requires a written "action plan" for the exercise of any of the borough's relevant potential powers to achieve air quality standards and objectives to be prepared. An Air Quality Action Plan (AQAP) should be prepared within 12 months of an AQMA being declared. The AQAP must include a statement of the time or times by or within which the borough proposes to implement each of the proposed measures comprised in the plan.
- 8.2.4 The applicable guidance makes clear that the AQAP should take a practical approach towards focussing on what really matters identifying the nature of the problem and detailing measures that are or will be actively implemented to improve air quality and where possible quantifying their impact over time.

- 8.2.5 AQAP's are expected to include the following:
 - Quantification of the impacts of the proposed measures wherever possible including, where feasible, data on emissions and concentrations (either locally obtained and/or via regional or national monitoring/modelling statistics). It is important that the borough shows how it intends to monitor and evaluate the effectiveness of the plan.
 - Clear timescales, including milestones and expected outcomes which the borough and other delivery partners propose to implement the measures within the AQAP.
 - How the borough, including its transport, planning and public health departments, and its other external delivery partners, will take ownership of the exceedance problem and in what capacity they will work together to implement the AQAP.
- 8.2.6 The GLA has developed an Air Quality Action Matrix, to help ensure co-ordinated, focused and consistent action across boroughs. Within their AQAP's boroughs should include all of the matrix actions (unless there are extenuating circumstances which have been agreed with the GLA) and commit to and ensure a strong focus on the key priority actions.
- 8.2.7 Boroughs are expected to revise their Air Quality Action Plans every 5 years as a minimum, and they should keep action records current and relevant by adding any new actions into the Action Table within the Annual Status Report which each borough is responsible for submitting to the Mayor of London.
- 8.2.8 When carrying out their Part IV functions, Schedule 11 of the 1995 Act requires consultation with a range of persons and organisations as detailed in the consultation section of this report.
- 8.2.9 Amendments made to the 1995 Act by the Environment Act 2021 strengthen the air quality duties by giving greater clarity on the requirements of action plans enabling greater collaboration between local authorities and all tiers of local government, as well as with Relevant Public Authorities, in the creation and delivery of those plans. It also requires the Secretary of State to regularly review the National Air Quality Strategy, which specifies the standards and objectives that local authorities need to achieve.
- 8.2.10 Part 3 of the Clean Air Act 1993 is the main legislative framework for the control of pollution from domestic solid fuel burning, a main contributor to fine particulate matter emissions in the UK. It gives local authorities the power to make an order designating parts of their area as Smoke Control Areas (SCAs), in which it is an offence to emit smoke from chimneys of buildings and chimneys that serve the furnace of any fixed boiler or industrial plant. The amendments in the 2021 Act enable local authorities to issue civil financial penalties instead of criminal prosecutions, with the aim of making enforcement quicker, simpler and more proportionate. It removes current statutory defences (including the use of an exempt appliance or an authorised fuel) which currently said to hinder enforcement. It strengthens the existing penalties for the sale of controlled solid fuels in SCAs, and ensure consumers are aware that it is an offence to buy these fuels for use in SCAs. It also gives local authorities the power to broaden the scope of their SCAs to include moored vessels, subject to local consultation.

8.2.11 Part 3 of the Environmental Protection Act 1990 stipulates what can constitute a statutory nuisance. This includes smoke from premises, except private dwellings in SCAs which are exempt. The amendment of the 1990 Act by this Act removes this exemption in England so that a local authority will be able to pursue somebody who emits smoke from private dwellings in SCAs where it is prejudicial to human health or causing a nuisance.

Approved by Sandra Herbert, Head of Litigation and Corporate Law on behalf of the Director of Legal Services and Monitoring Officer (11/04/24).

8.3 EQUALITIES IMPLICATIONS

- 8.3.1 Under the Public Sector Equality Duty of the Equality Act 2010, decision makers must evidence consideration of any potential impacts of proposals on groups who share the protected characteristics, before decisions are taken.
- 8.3.2 By law, assessments must be carried out throughout planning and delivery and contain sufficient information to enable the local authority to show it has paid 'due regard' to the equality's duties; and identified methods for mitigating or avoiding adverse impact on people sharing protected characteristics.
- 8.3.3 The Air Quality Delivery Plan 2024-2029 requires the Council to take positive steps to tackle the effects of poor air quality in the borough. The measures to be taken will have a positive impact on all communities and there is no group with a protected characteristic that will be negatively impacted by the actions in the plan.
- 8.3.4 The EQIA undertaken has identified no direct or indirect negative impact on protected groups.

Comments approved by: Helen Reeves, Head of Strategy & Policy (27 March 2024).

8.4 ENVIRONMENTAL IMPLICATIONS

- The Council has a commitment to address environmental sustainability as an integral part of all activity.
- The Air Quality Delivery Plan matrix includes quantification, where possible, of the improvement to air quality that each measure, proposed or implemented, is expected to have over time, with a clear date for meeting this target.
- All actions are expected to have a beneficial impact on Croydon's air quality
- None of the actions are expected to have any negative environmental impact. It is expected that many of the actions will have a positive impact on improving air quality.
- In some cases it may be difficult to quantify the impact that certain measures have. For example, it is likely that it will not be possible to calculate the impact on concentrations of PM₁₀ and NO₂ that a permitting scheme to encourage low emission vehicles will have, but the definition of low emission vehicle that is used (relevant Euro standards, for example) and the number of permits issued will be useful information to include.

8.5 **RISK IMPLICATIONS**

8.5.1 There is a risk that if the recommendations in this report are not approved and the Air Quality Delivery Plan 2024-2029 subsequently adopted, action to tackle poor air quality in the borough will not progress at the pace it is required to thus the council may not meet its statutory duties.

8.6 DATA PROTECTION IMPLICATIONS

- 8.6.1 This report will not involve the processing of personal data.
- 8.6.2 The Director of Streets & Environment comments that agreeing the recommendations in this report will not result in the processing of personal data.
- 8.6.3 Approved by: Karen Agbabiaka, Director of Streets and Environment (27 March 2024).

9. APPENDICES

Appendix 1: Draft Air Quality Delivery Plan 2024-2029 Appendix 2: Equality Analysis Form

10. BACKGROUND DOCUMENTS

None.

LONDON BOROUGH OF CROYDON AIR QUALITY DELIVERY PLAN 2024 – 2029

To ADD IMAGE

Foreword from Croydon's Executive Mayor/The Cabinet Member for Streets & Environment and/or the Director of Public Health

"to be inserted following consultation"

Foreword from Croydon's Executive Mayor/The Cabinet Member for Streets & Environment and/or the Director of Public Health

"to be inserted following consultation"

CONTENTS

- 1. Introduction
- 2. What is our approach
- 3. Air Quality Monitoring
- 4. Measuring impact
- 5. Action Plan

1. Introduction

This report outlines the actions that Croydon will deliver between 2024-2029 in order to reduce concentrations of pollution and exposure to pollution; thereby positively impacting on the health and quality of life of residents and visitors to the borough.

It has been developed in recognition of the legal requirement on the local authority to work towards air quality objectives under Part IV of the Environment Act 1995, as amended and relevant regulations made under that part and to meet the requirements of the London Local Air Quality Management statutory process¹.

Progress on Air Quality Action Plan 2017-2022

This Air Quality Delivery Plan (AQDP) has been produced as part of our duty to London Local Air Quality Management. It outlines the action we will take to improve air quality in Croydon between 2024-2029. Amendment to dates has been approved by the GLA.

This delivery plan replaces the previous action plan which ran from 2017-2022. Highlights of successful projects delivered through the last action plan include:

Monitoring and other core statutory duties:

• We have continued to monitor Air Quality and increased the network using lamp post AQ sensors, the majority of which are located in central Croydon. In 2022, the network consisted of 38 sensors.

Cleaner Transport

- Electric Vehicle Charging Points (EVCPs)
 - Croydon had 380 slow/fast public charging points (EVCP) by 2022, mainly installed from 2017 onwards (with some older EVCP removed): approx. 340 through the council, 40 commercial on private land.
- Cleaner Air

¹ LLAQM Policy and Technical Guidance. https://www.london.gov.uk/what-we-do/environment/pollution-and-air-quality/working-boroughs

- Idling Vehicles Multiple spot checks were carried out at bus stands in response to reports and complaints from the public. 5 antiidling events were held outside schools where pupils and volunteers engaged with drivers to raise awareness about the negative impacts of idling vehicles on local air quality
- Public Health and Awareness Raising
 - As part of the Pan London Anti Idling project, AQ workshops were held at 6 primary schools, reaching a total of 895 pupils. In addition, 5 anti-idling events were held outside schools where pupils and volunteers engaged with drivers to raise awareness about the negative impacts of idling vehicles on local air quality. A total of 39 Volunteers took part in this initiative. The Council also made a video promotion for school engagement which was shared via social media.
 - Carried out air quality audits in primary schools located in the worst polluted areas in Croydon. 10 schools were shortlisted following a ranking exercise and a trial audit was carried out.
- Localised Solutions
 - Implemented school streets there are currently 14 permanent Healthy School Streets. A further 42 Healthy School Streets have been implemented but not yet confirmed as permanent. 10 were implemented during 2019-20 and 32 were implemented during 2022-23

Green Infrastructure. We installed 60 new planting bays alongside roads in the borough's neighbourhoods, funded by the Mayor of London.

Air pollution is associated with a number of adverse health impacts. It is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions. There is also often a strong correlation with equalities issues, because areas with poor air quality are also often the less affluent areas^{2,3}. The annual health costs to society of the impacts of air pollution in the UK is estimated to be roughly £15 billion⁴. Croydon is committed to reducing the exposure of people in Croydon to poor air quality in order to improve health.

² Environmental equity, air quality, socioeconomic status and respiratory health, 2010.

³ Air quality and social deprivation in the UK: an environmental inequalities analysis, 2006.

⁴ Defra. Air Pollution: Action in a Changing Climate, March 2010

What we want to achieve with this plan

Our Vision

Mayor's Business plan 2022-2026

Croydon is a place of opportunity for business, earning and learning Support the regeneration of Croydon's town and district centres, seeking inward investment and grants Croydon is a cleaner, safer and healthier place, a borough we're proud to call home Lead action to reduce carbon emissions in Croydon People can lead healthier and independent lives for longer Work closely with health services and the VCFS to improve resident health and reduce health inequalities

What are Croydon's Air Quality Priorities

To reduce exposure to air pollution and to raise awareness for residents and those who work in Croydon. It has been estimated that up to 40% of pollution in Croydon is from outside London and Europe therefore actions to reduce pollution in Croydon are limited. Therefore we need to engage with residents and businesses to reduce exposure to air pollution and to raise awareness to change people's behaviour by encouraging people to walk and cycle more so they can live healthier and more pleasant lives. By working with Public Health and others we want to raise awareness through school projects, local community projects and local businesses, so there is pride in Croydon

The **Mayor's Business plan 2022–2026** sets out priorities to make Croydon a place of opportunity for businesses, earning and learning by supporting the regeneration of Croydon's town and district centres through investment and grants; ensuring that Croydon is a cleaner, safer and healthier place we're proud to call home; and be a place where people can lead healthier and independent lives, by working closely with health services and VCFS to improve resident health and reduce health inequalities.

2. What is our approach?

The Air Quality Delivery Plan focuses on five key themes:

These themes are how we organize and think about our work. Throughout our work, we need to ensure we focus on the key questions of:

- 1) How do we identify who this work is for and targeting?
- 2) How do we support those at risk?
- 3) How do we protect those at risk?
- 4) How do we make sure those people are engaged and part of the process?
- 5) How do we know our work is achieving the results we want?

How will we deliver this?

- We will continue meeting with the Air Quality Delivery Plan Steering group led by the Pollution Team that draws in our statutory partners to implement and oversee the delivery of this plan.
- Each of the five themes will be developed further with members of the statutory partners, the voluntary sector and other organisations. This is outlined in the "What we will do" section of each template.
- We will work with Public Health to identify further interventions and projects that can be delivered in Croydon over the next five years.
- Wherever possible, we will draw in additional funding from the Mayor's Air Quality Fund (MAQF) and the DEFRA Air Quality Fund, to supplement and build on this plan.

We have developed actions that can be considered under six broad topics:

- **Monitoring and other core statutory duties:** Croydon has maintained its continuous monitoring network and increased the network using lamp post AQ sensors. This improves information about changes in air quality over time. The new equipment also allows the Council to monitor more pollutants that are in the air. The Council has made the information publicly available to help inform about air pollution.
- Emissions from developments and buildings: emissions from buildings account for about 21% of the NO_X emissions across London, so are an important source of NO₂. Croydon seeks to reduce emissions from fuel combustion. This aim aligns with Croydon's Carbon Neutral Plan.
- **Public health and awareness raising**: Increasing awareness can drive behavioural change that lowers emissions and informs the public how to reduce their exposure to air pollution;

- **Delivery servicing and freight**: Goods and service vehicles are usually diesel powered and have high NO₂ emissions. Low emission logistics requires alternatively fuelled vehicles to combat air pollution from this source;
- **Borough fleet actions**: Croydon's fleet includes light and heavy duty diesel-fuelled vehicles such as mini buses and refuse collection vehicles with high primary NO₂ emissions. Croydon will review its own fleet procurement to lead by example;
- Localised solutions: Supporting neighbourhoods to introduce information or undertake actions to improve air quality
- **Cleaner transport:** Road transport is the main source of air pollution in London. There is a need to incentivise a modal shift to walking, cycling and ultra-low emission vehicles (such as electric).

Our key priorities for 2024–2029 are:

- 1. Work towards the 2005 WHO guidelines for PM_{2.5} with a target of compliance deadline by 2030 and review the emerging policies from the GLA in respect of the 2021 WHO guidelines.
- 2. Increase the network of air quality monitoring across the borough.
- 3. Continue to engage schools around whether there is a need to introduce further Croydon Healthy School Streets (this can include traffic calming measures, Air Quality audits and increase of green infrastructure working with Trees for Cities) whilst recognising that such matters also have attendant statutory consultation requirements and procedures which would need to be adhered and substantiated including on Traffic Management grounds, prior to any introduction.
- 4. NRMM, particularly from the construction sector, is a significant contributor to London's air pollution with around seven per cent of NOx and eight per cent of PM10 emissions in London. The NRMM Low Emission Zone requires that all engines with a power rating between 37 kW and 560 kW meet an emission standard based on the engine emission "stage". The Council has signedup for the pan London GLA NRMM scheme delivered by Merton Council, responsible for enforcing NRMM standards at major construction sites in the borough.
- 5. As Croydon is an AQMA, new developments should be air quality positive or at least 'air quality neutral'.
- 6. Continue to raise awareness and encourage behaviour changes through air quality campaigns.
- 7. Assess potential impact of intensifying Electric Vehicle Infrastructure

- 8. Reduce emissions from the burning of non seasoned wood reduce particulate emissions from wood burning in the home by an awareness campaign of appropriate words for burning.
- 9. Assess the wider role of fleet within the services the Council provides to ascertain compatibility with the Council's air quality aims. The Council fleet currently comprises 98 leased vehicles, 54 owned vehicles and 10 short-term hired vehicles. In addition there are many other Council services for which fleet would form part of their provision – i.e. all deliveries of any contractors to the Council, FM Conway (Highways), Veolia (waste and street cleansing), arbo-cultural providers. However, there are major financial implications regarding this action and it will need further assessment.
- 10. Provide new cycling and walking infrastructure and assess air quality impacts of new infrastructure.

This delivery plan sets out how Croydon Council will effectively deliver against the above broad themes and key priorities, thereby improving air quality issues that are within the Council's control and thereby leading by example. However, it is important to recognise that these are local drivers aimed at tackling air pollution and that air pollution by its very nature is cross boundary.

Engagement with partners and communities can make a difference to air quality in the borough. Croydon Council will continue its positive work with partners and communities, as the council deliver's this new action plan over the next five years.

This AQDP outlines how the Council will plan to use local levers under our control to greatest effect in tackling air quality.

However, there are many air quality policy areas outside the Council's influence (such as Euro standards, national vehicle taxation policy, taxis and buses) and Croydon Council will continue to work with and lobby regional and central government on policies and issues beyond Croydon's direct control.

3. Air Quality Monitoring

Summary of current air quality in Croydon

The 2019 UK Clean Air Strategy provides the overarching strategic framework for air quality management in the UK and contains national air quality standards and objectives established by the Government to protect human health. The Strategy objectives take into account limit values set under EU Directives that member states are legally required to achieve by their target dates. On leaving the EU, the UK incorporated this requirement into national law.

Reviewing Croydon's monitoring data over the last few years shows that Croydon is meeting all of the national objectives other than for Nitrogen Dioxide (NO₂). The monitoring data in 2020 was influenced by the reduced traffic flows in response to the COVID-19 lockdowns. The 2016 London Atmospheric Emission Inventory concentration maps show that there are areas in Croydon that exceed the legal objectives.

Croydon has four continuous air quality monitoring stations located in London Road, Norbury; Norbury Manor school, Norbury; Wellesley Road/Park Lane and at the Fiveways junction, Purley Way. Details can be found at:

http://www.londonair.org.uk/london/asp/publicbulletin.asp?la_id=8. Additional data from the London Atmospheric Inventory (LAEI) 2013 can be found at http://data.london.gov.uk/london/asp/publicbulletin.asp?la_id=8. Additional data from the London Atmospheric Inventory (LAEI) 2013 can be found at https://data.london.gov.uk/dataset/london-atmospheric-emissions-inventory-2013

For full details of current air quality in Croydon please review our Annual Status report which can be found on the Love Clean Air website (http://lovecleanair.org/local-air/local-reporting/croydon-2/#.)

The UK has legally binding targets to reduce overall national emissions of five air pollutants (fine particulate matter, ammonia, nitrogen oxides, sulphur dioxide, and non-methane volatile compounds) by 2020 and 2030. The Government has set two further targets for fine particulate matter (PM2.5) in England through The Environmental Targets (Fine Particulate Matter) (England) Regulations 2023 (SI 2023/96):

• PM2.5 annual mean concentration target – a target of 10 micrograms per cubic metre (µg m3) to be met across England by 2040.

• PM2.5 population exposure reduction target – a 35% reduction in population exposure by 2040 (compared to a base year of 2018).

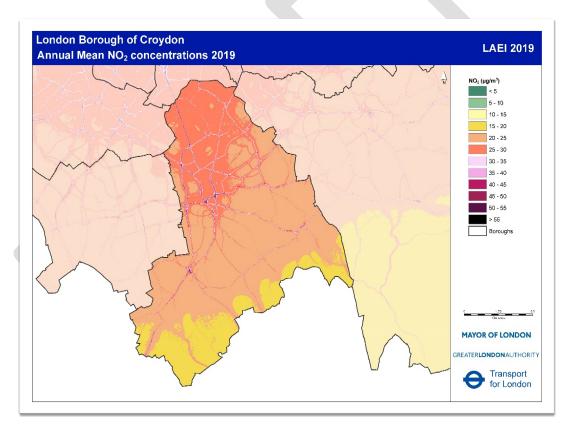
For $PM_{2.5}$ the legal objective is far higher than the World Health Organisation (WHO) recommended guideline limit. For this reason, the Mayor for London's London Environment Strategy commits to meeting the 2005 WHO health-based guideline limits across London by 2030. Current air quality data indicates that Croydon is exceeding World Health Organisation guideline $PM_{2.5}$ limits. Developing measures to reduce $PM_{2.5}$ will be important to help achieve this 2030 target.

Particulate Matter (PM) is the term for a mixture of solid particles and liquid droplets found in the air. Some particles, such as dust, dirt, soot, or smoke, are large or dark enough to be seen with the naked eye. Others are so small they can only be detected using an electron microscope.

Particle pollution includes:

• **Particulate Matter (PM₁₀)** are inhalable particles, with diameters that are generally 10 micrometres and smaller and **Particulate Matter** (**PM_{2.5}**) are fine inhalable particles, with diameters that are generally 2.5 micrometres and smaller. In comparison a diameter of a single hair from your head is about 70 micrometres in diameter – making it about 30 times larger than the largest fine particle.

Figure 1 Modelled map of annual mean NO₂ concentrations (from the LAEI 2019)





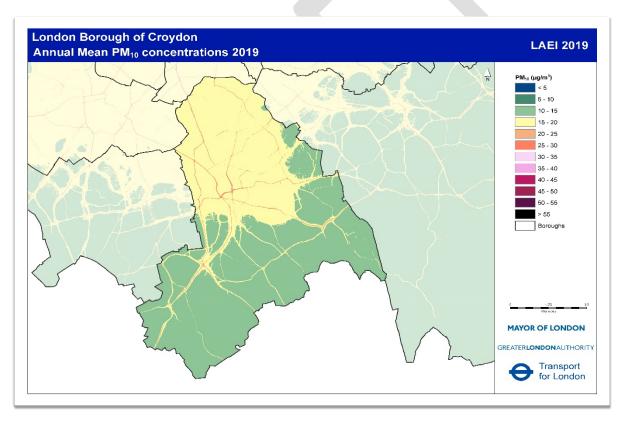
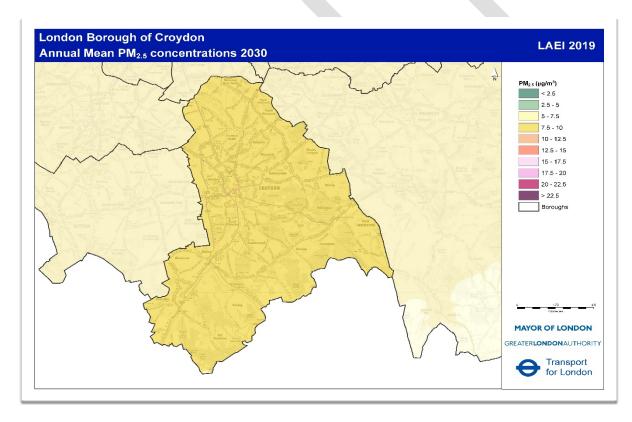


Figure 3 Modelled map of annual mean PM_{2.5} (from the LAEI 2019)



AQMA's and Focus areas

In Croydon an Air Quality Management Area (AQMA) has previously been declared for the whole of the borough.

The AQMA has been declared for the following pollutant/s: Nitrogen dioxide – because Croydon is failing to meet the EU annual average limit for this pollutant at some of our monitoring stations and modelling indicates it is being breached at a number of other locations.

An air quality Focus Area is a location that has been identified as having high levels of pollution and human exposure. There are five focus areas in the borough. These are:

- Norbury London Road
- Thornton Heath Brigstock Road/High Street/Whitehorse Lane
- Waddon Fiveways Corner
- Thornton Heath Pond and London Road to St. James Road
- Purley Cross

Sources of Pollution in Croydon

Pollution in Croydon comes from a variety of sources. This includes pollution from sources outside of the borough and, in the case of particulate matter, a significant proportion of this comes from outside of London and even the UK.

Figures 5, 6 and 7 show the sources of pollution in the borough. They show that of the pollution that originates in the borough the main sources of NO_2 are road transport at 60% with industrial/commercial heat and power at 16%, domestic and commercial gas heating at 14% and construction at 10%.

The main sources of PM_{2.5} are road transport at 34%, domestic biomass (wood burning) at 26%, domestic heat/power at 10%, construction at 10%. Croydon has a number of industrial sources in the borough known as Part B processes. There are a total of 75 processes in Croydon, the majority being dry cleaners but also petrol stations, one crematorium, one cement batching plant and two vehicle resprayers. There is an aggregate site

which is enforced by the Environment Agency (EA). In addition there is one Part A process, a gas powered energy plant which is enforced by the EA.

Air quality can also be affected by the ongoing and future growth in central Croydon which is undergoing significant change. As more development occurs and the residential, working and visiting population increases, this can create more pollution which needs to be managed.

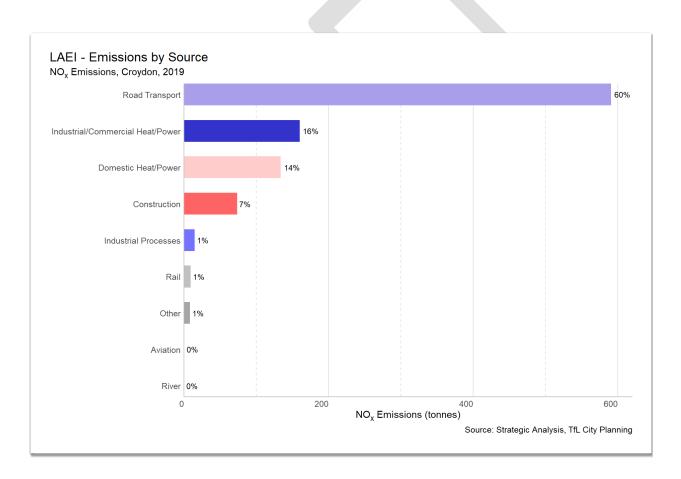


Figure 4 NOx Emissions by source (from the LAEI 2019)

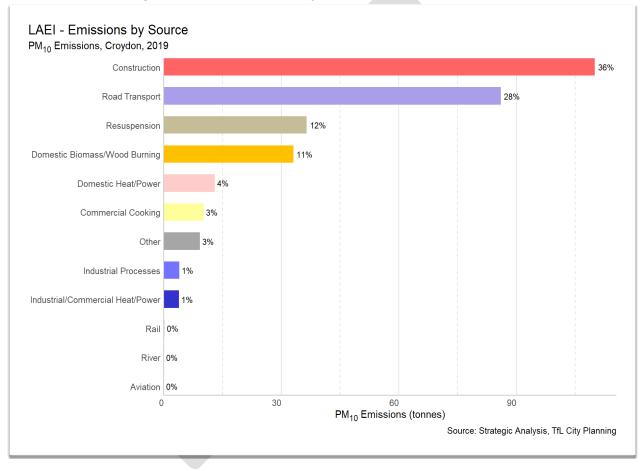
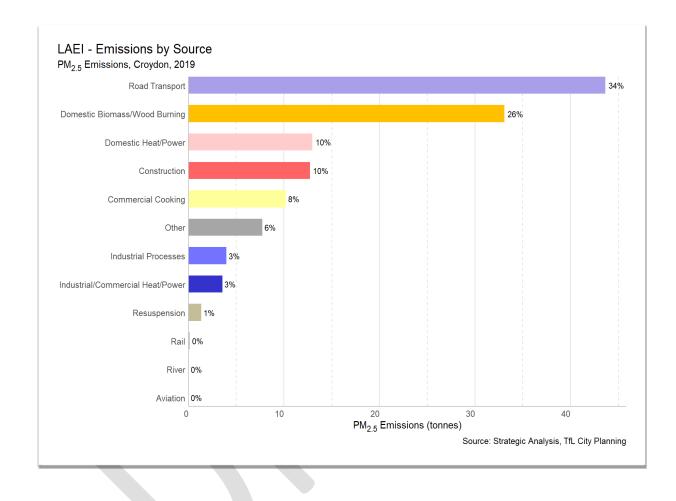


Figure 5 PM₁₀ Emissions by source (from the LAEI 2019)

Figure 6 PM_{2.5} Emissions by source (from the LAEI 2019)



4. Measuring Impact

For the plan to succeed, Croydon must be clear about what it is attempting to achieve and how it will be measured. This is a complex area with many interlinked elements, both short and long term, and measuring our impact is both challenging and necessary if Croydon is to succeed.

Our top line measures:

- **Monitoring and other core statutory duties –** To improve information about changes in air quality over time.
- Emissions from developments and buildings Seek to reduce emissions from fuel combustion.
- **Public health and awareness raising –** Increasing awareness can drive behavioural change that lowers emissions, and informs the public how to reduce their exposure to air pollution.
- **Delivery servicing and freight** Seek to increase alternatively fuelled vehicles to combat air pollution from this source.
- Borough fleet actions Croydon will review its own fleet procurement to lead by example.
- Localised solutions Supporting neighbourhoods by providing information or undertake actions to improve air quality.
- **Cleaner transport** There is a need to incentivise a modal shift to sustainable and active travel such as walking, cycling and ultra-low emission vehicles (such as electric).

Theme & project performance targets

Each of the five themes that contribute to delivering our top line measures will have specific performance targets and metrics developed that both measure the impact of the work. As outlined under our commitments to co-production, these will be further developed with the community and voluntary sector over the lifespan of this action plan. Every project intervention or action within the plan must be accompanied by a measurement of outcome and impact where possible for it to be agreed by the steering group board.

Public Health analysis & support

It is important to recognise the expertise and value of Public Health led evaluation in any intervention. We will involve and work with The Director of Public Health and their senior team to ensure that the principles and tools of public health analysis are embedded throughout all our work in delivering this plan. The Director of PH has identified some dedicated time of a Consultant in Public Health to support this work.

How will it be monitored?

Monitoring will be through the Air Quality Delivery Plan Steering Group Annual status report for air pollution and action plan updates

Development and Implementation of Croydon's AQDP

Partner Engagement

In developing/updating the delivery plan, the council will work with other local authorities, agencies, businesses and the local community to improve local air quality. Croydon Council will carry out the following engagement with partners:

- Articles in local newsletter
- Information on the councils website
- Information on 'love clean air' website
- Email briefings to community and voluntary sector organisations
- Attendance at festivals
- Drop in events in Surrey Street
- Focus groups
- Online Survey
- Articles in 'Our Croydon'
- Plasma Screen in lift lobbies
- Screen in Access Croydon

Consultation to be undertaken for the final AQDP

Yes/No	Consultee
Yes	The Secretary of State
Yes	The Environment Agency
Yes	Transport for London and the Mayor of London (who will provide a joint response)
Yes	Neighbouring local authorities
Yes	Other public authorities as appropriate
Yes	Bodies representing local business interests and other organisations as appropriate
Yes	Residents and businesses

5. Delivery Plan

This Matrix outlines 25 actions to consider delivering locally as part of Croydon's London Local Air Quality Management action planning obligations. This is not an exhaustive list. It is a list of actions which utilise the levers that are under borough control which may be used to improve air quality. Where possible each action includes: examples/case studies, an assessment of the possible benefits, and a provisional assessment of high-level risks.

The actions have been assessed against the perceived ease of delivery and the possible magnitude of air quality benefits, and these scores are then multiplied to give a priority rating (the highest being 1 and the lowest 15). In reality, the ease of delivery and possible benefits will clearly vary very significantly from borough to borough and will depend on the characteristics of the individual projects; these ratings should therefore be viewed as an indicative guide only, and boroughs will obviously need to consider local conditions when assessing the potential ease and benefits of actions.

The Matrix actions are divided into 6 categories: Emissions from developments and buildings; Public health and awareness raising; Delivery servicing and freight; Borough fleet actions; Localised solutions; and Cleaner transport. This document begins with a Main Table, summarising the actions and their priority level ratings. Initial suggestions for KPIs are shown within each action and these will be further developed as part of the statutory consultation, to be included in the final Air Quality Delivery Plan. Also, prior to the Plan being approved, actions within this Main Table will contain links which will lead to more detailed information on the action.

The Matrix will be a living document; it will be refreshed every five years, at which time actions may be added, removed or modified.

Air Quality Monitoring

Air quality monitoring is critical to understanding and addressing the problem. Borough monitoring networks are essential to this. They also inform and validate all modelling for London. Monitoring is the bedrock of the LLAQM (London Local Air Quality Management)

It is led by the Councils Pollution Team. An annual air quality status report is provided detailing air pollution and action plan updates and is approved by the GLA.

כ	Air Quality Monitoring and other core statutory duties	Lead Services Organisations	Timescale	Why is Croydon Council doing this and what will it achieve?	Outputs, Targets and KPI	Information
	1. Maintaining and where possible expanding monitoring networks, and fulfilling other statutory duties	Pollution Team	1. Ongoing	Monitoring is critical to understanding and addressing the problem. Borough monitoring networks are essential to this.	KPI: All monitors fully calibrated & serviced every year. Target: Over 90% data capture at all sites.	The pollution team to extend the monitoring network at hot spot areas in the borough.
	2. To undertake procurement exercise to purchase new NOx and PM2.5 equipment using section 106 funding for existing continuous monitoring station		2. September 2024	Essential for enabling awareness raising and understanding the extent of the problem and identifying targets for action and funding. They also inform and validate all modelling for London.	KPI: Submission of statutory annual status report on time each year.	Details of monitoring can be found at lovecleanair.org. Includes Latest Annual Status Report. Additional monitoring to be an integrated part of planning process, to enable assessment, mitigation and protection against adverse impacts from construction

Emissions from developments and buildings

The main air quality risks during construction and demolition are fugitive emissions from on-site activities, transport of materials, waste and staff to and from site (logistics) and emissions from on-site non-road mobile machinery (NRMM), with around seven per cent of NOx and eight per cent of PM10 emissions in London. It is a statutory requirement to undertake regular inspections to ensure compliance.

This is led by the Pollution Team both proactively reviewing Construction Logistics Plan and enforcement by officers where required.

In addition wood burning is responsible for between 23 and 31 per cent of the urban derived PM2.5 in London. All London boroughs have declared Smoke Control Zones, under the Clean Air Act 1993, covering some or all their area. Emissions of dark smoke from chimneys are not allowed in these areas.

Page 259	Emissions from developments and buildings	Lead Services Organisatio ns	Timescale	Why is Croydon Council doing this and what will it achieve?	Outputs, Targets and KPI	Action / Information
9	3. Ensuring emissions from construction are minimised During construction, developers and contractors should follow the guidance set out in The Control of Dust and Emissions during Construction and Demolition Supplementary Planning Guidance: carry out an Air Quality and Dust Risk Assessment and submit an Air Quality and Dust Management Plan for	Pollution Team/ Planning Development	Ongoing	Minimise exposure of residents near developments. Avoids unnecessary emissions from construction sites. Encourages planners, developers and local authorities to think about air quality through every stage of the development and construction process.	Target: 100% of relevant applications to include appropriate conditions on construction dust mitigation.	 Pollution Officers review all Construction and Logistics Plans for approval. Enforcement officers carry out visits following complaints regarding dust. The pollution team aim to employ construction compliance officer utilising section 106 monitoring fees

Emissions from developments and buildings	Lead Services Organisatio ns	Timescale	Why is Croydon Council doing this and what will it achieve?	Outputs, Targets and KPI	Action / Information
the construction, implement mitigation					
4. Ensuring enforcement of Non Road Mobile Machinery (NRMM) air quality policies. As well as fugitive dust emissions (air pollutants generated during construction activities such as sand) from onsite activities, another major source of emissions from construction sites is from Non-Road Mobile Machinery (NRMM). NRMM used in the construction and infrastructure building sectors currently accounts for around seven per cent of NOx and eight per cent of PM10 emissions in London. For example a generators and construction machinery used on site	Pollution Team/Pan- London NRMM Group	Ongoing	Minimise exposure of residents near developments from the onset. Avoids unnecessary emissions from construction sites. NRMM contributes to a large proportion of emissions. The pan- London NRMM Low Emission Zone relies on consistent delivery and on-site enforcement by all boroughs to ensure it is effective and credible, and there is Mayor's Air Quality Funding available to support this	Target: 100% of relevant applications to include appropriate conditions on PM and NOx mitigation	The NRMM Low Emission Zone requires that all engines with a power rating between 37 kW and 560 kW meet an emission standard based on the engine emission "stage". LBC has signed-up for the pan London GLA NRMM scheme delivered by Merton Council, responsible for enforcing NRMM standards at major construction sites in the borough.
5. Reducing emissions from combustion-based Combined Heat and Power (CHP) Plant	Pollution Team/ SCRER/ Development Management	Ongoing	Combustion-based CHP can be a significant source of local emissions so tackling this is an important priority.	Target: Conditions attached to ensure that 100% of new energy installations are compliant with the latest London Plan. KPI: To be reported on annually	We seek compliance with London Plan policies that require developers to quantify the impact of CHPs on air quality to support their air quality neutral (AQN)/air quality positive (AQP) proposal, as opposed to accepting qualitative treatment.

Emissions from developments and buildings	Lead Services Organisatio ns	Timescale	Why is Croydon Council doing this and what will it achieve?	Outputs, Targets and KPI	Action / Information
6.Enforce Air Quality Neutral policy (AQN) a. Air Quality Neutral is a benchmark standard for new buildings. It is designed to ensure that they do not emit more pollution than existing buildings of the same type. b. Reduce emissions from emergency diesel-or petrol powered generators	Pollution Team/ SCRER	Ongoing	Reduces the contribution to pollution from new development. Minimise exposure to residents of new developments from the onset	Target: Conditions attached to any developments that propose any emergency generators onsite. KPI: To be reported annually.	The Pollution Team will work with Planning and the Procurement Team to ensure the most suitable abatement technology to reduce emissions LBC encourages developers to harness and maximise energy from renewables and using technology (air/ground source heat pumps and Photovoltaics (PV) . All eligible developments must provide appropriate AQN/AQP documentation/mitigations. LBC will consider alternative technology to diesel generators. If viable alternatives can't be found, then developers will be requested to submit post installation emission testing by an accredited laboratory to ensure NOx emissions at the flue meet emission standard of 150mg/Nm-3 (at 5% O2). Substituting diesel generators for alternative cleaner power (mains electricity) can be undertaken at construction sites, emergency power back-ups, roadside servicing and repairs, fast-food kiosks/outlets on high streets, leisure events, summer festivals, wherever there is relevant exposure and risk to public health. Construction plans including diesel generators at construction sites. The pollution team will review all planning applications to ensure air quality neutral is incorporated into the planning application

Emissions from developments and buildings	Lead Services Organisatio ns	Timescale	Why is Croydon Council doing this and what will it achieve?	Outputs, Targets and KPI	Action / Information
7.Air Quality Positive (AQP) is a new approach and it seeks to exploit the ability of large developments to shape their area to build in benefits for air quality.	Pollution Team/ SCRER	Ongoing	Air Quality Positive is a new approach and it seeks to exploit the ability of large developments to shape their area to build in benefits for air quality	Target: 100% of eligible developments meeting the air quality neutral standards per year. KPI: To be reported annually	The pollution team will continue to review all planning applications to ensure air quality positive is incorporated into the planning application.
 8.Ensuring adequate, appropriate and well located green space and infrastructure is included in new developments. a) Protect and safeguard Green Belt and local green spaces. b) Protect and Enhance biodiversity across the borough c) Protect and enhance woodlands, trees and hedgerows 	Pollution Team/ SCRER/Dev elopment Management	Ongoing	Green infrastructure schemes can transform urban areas and help to provide improved public spaces. Whilst it can be hard to quantify air quality exposure improvements from such schemes it may therefore be useful to consider such schemes as part of the Healthy Streets approach or to look at the measures of success built into Green Infrastructure proposals	Target: 100% of major development applications to integrate green space/communal gardens. KPI: To be reported annually	Green space on new developments can provide a range of important functions. It can for example provide a way to set the building back from the kerbside thereby reducing exposure of occupants. Other green infrastructure such as trees, hedges and green walls can also provide a barrier between roads and new developments. The Croydon Local Plan has policies that enhance greening. Policy SP6: Green Grid states that in order to deliver new and enhance green infrastructure commensurate with growth the council will apply a presumption in favour of development provided applications assist in the delivery of a Green Grid. The Pollution Team will continue to seek options to improve green infrastructure

Emissions from developments and buildings	Lead Services Organisatio ns	Timescale	Why is Croydon Council doing this and what will it achieve?	Outputs, Targets and KPI	Action / Information
9.Assess feasibility and appropriateness of extending Smoke Control Zones to the whole of the borough. Currently only half the borough is a smoke control zone.	Pollution Team/ Public Health Department/ London wide wood burning project group	December 2024	Raise awareness: Research suggests that many Londoners are unaware that they live in a Smoke Control Zone and are unintentionally breaching current legislation and consequences to the public.	Assess current level of non compliance in respect of wood burning in the borough and as deemed necessary, undertake awareness campaign with residents and business to reduce the use of unsuitable wood and greater use of more effective wood burning technology.	Explore feasibility of extending the smoke control zone across the whole borough. Research suggests that wet wood fuel contributes far more to particulate emissions than dry wood. Changing consumer habits is the best way to address this issue. An awareness campaign could reap huge benefits. Raise awareness: Research suggests that many Londoners are unaware that they live in a Smoke Control Zone and are unintentionally breaching current legislation and consequences to the public. The AQAP 2017-22 consultation process found that residents responded that 50% strongly agreed and 23% agreed to extend the smoke control to the whole of the borough
10.Burning Wood Appropriately Reduce emissions from wood burning by undertaking an awareness campaign with residents to seek to ensure that the most appropriate wood burning methods are used	Pollution Team	Ongoing	Recent research suggests that wood burning is responsible for between 23 and 31 per cent of the urban derived PM2.5. Imperial College estimates that each year wood burning contributes between 23% and 31% of the PM2.5 emitted from	Undertake initial awareness campaign in respect of correct type of wood to burn and best use of the most effective wood burning technology/appliances to reduce emissions and therefore health harms by March 2025.	 Actions: An awareness campaign with residents to include the provision of visible advice on fuels and appliances at point of sale, as well as information on bonfires and barbeques. Engaging local suppliers within smoke control zones to ensure only appropriate technology and fuels are sold. This could include a

Emissions from developments and buildings	Lead Services Organisatio ns	Timescale	Why is Croydon Council doing this and what will it achieve?	Outputs, Targets and KPI	Action / Information
			within London. Reducing this would clearly have a huge impact on PM2.5 emissions This does not seek to ban wood burning, rather to encourage the correct fuels and that the most effective wood burning technologies are used.		 recognition scheme for responsible vendors. Provide and publicise garden waste collection services to reduce bonfires Croydon is part of the London wide wood burning project: to date - undertaken an air quality survey with residents; produced press releases; guidance documents.
11.Promoting and delivering energy efficiency and energy supply retrofitting projects in workplaces and homes through Energy For Londoners (EFL) retrofit programmes such as RE:FIT, RE:NEW and through borough carbon offset funds. Gas boilers are the second largest individual source of NOx (Nitrogen Oxides) in London. They also contribute significantly to indoor air pollution.	Pollution Team/ Carbon Neutral Programme Manager/ Energy Team Leader	Ongoing	Gas boilers are the second largest individual source of NOx in London. They also contribute significantly to indoor air pollution. Directly reduces emissions and has co- benefits for carbon emissions and reducing fuel costs. Furthermore, there are existing frameworks to support this.	Achieve a reduction in gas boilers being used in domestic and work settings through consumer behaviour shift to alternative energy sources.	Work with the Carbon Neutral Programme Manager and the Energy Team Leader regarding implementing this action.

Public Health and awareness raising

The Council is committed to protect public health and to improve air quality. Boroughs have integrated Public Health Departments and responsibilities to deliver against the Public Health Outcomes Framework. It is therefore of critical importance that air quality teams work closely with Public Health.

Councils should ensure that Directors of Public Health (DPH's) are regularly briefed on the scale of the problem in their local authority area; what is being done and what is needed.

Public Health Officers are on the air quality steering groups and help to ensure air quality is prioritised and that work on this agenda is recognised and easily evaluated through checking success of outcomes. It is led through a combination of statutory services, the pollution team and public health

Public Health and awareness raising	Lead Services Organisations	Timescale	Why is Croydon Council doing this and what will it achieve?	Outputs, Targets and KPI	Actions
12.Public Health department taking shared responsibility for borough air quality issues and implementation of Air Quality Delivery Plans.	Pollution Team /Public Health Department	Ongoing	Helps to ensure Directors of Public Health (DPH) are fully informed of the scale of the problem. Protecting public health is at the heart of the Council's efforts to improve air quality. It is of critical importance that air quality teams work closely with Public Health. Ineffective engagement with the DPH could lead to air quality being viewed as a burden rather than a genuine Public Health issue.	Target: Ensure that the Director of Public Health is consulted on Annual Status Reports and the Air Quality Delivery Plan.	Continued joint working with the Public Health Team
13.Engagement with businesses.	Pollution Team/ Carbon Neutral Programme	October 2024	The council can use existing communication channels and	Output: Croydon Council will Consider creating an internal working group to focus on	To work with the Carbon Neutral Programme Manager and the Head of Employment,

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J	Engagement with businesses to encourage active changes to improve air quality, particularly the NHS, schools, and Croydon Council – and their local supply chains	Manager/Head of Employment, Skills & Economic Development		relationships with BIDs and businesses. Reduces staff exposure as well as emissions. This provides an opportunity for businesses to work together to maximise benefits. For example, encouraging the businesses in an area to coordinate their deliveries and collections more efficiently, and adopt collective and/or collaborative deliveries and collections.	engaging with businesses on air quality. KPI: Monitor the progress of local businesses. Anchor institutions and local supply chains will be targeted.	Skills & Economic Development to deliver some of these actions.
• • •	14.Supporting a direct alerts service such as Airtext, and promotion and dissemination of high pollution alert services.	Pollution Team	Ongoing	airTEXT is a tool that provides forecasts of air quality, UV, grass pollen and maximum and minimum temperature alerts to vulnerable people; this is a fundamental element of delivering on air quality duties. Using social media to help disseminate the Mayor's alerts is also a low-cost way to raise awareness and reduce exposure amongst residents.	High pollution alert service information to be incorporated into Health Protection Forum and relevant extreme weather response/planning forums e.g. Winter planning. Awareness raising of airTEXT/high pollution alert services to be undertaken.	Croydon has signed-up to both the GLA's air pollution alerts and the airTEXT service; these are shared with schools, GP surgeries and care Homes. We will continue to look at new ways to increase airTEXT membership via SMS. Croydon will investigate improved engagement with GP surgeries, via Public Health, to target and protect vulnerable groups from impacts of air pollution, by increasing free subscription of airTEXT. airTEXT is also promoted on social media channels

	 15.Encourage schools to join the TfL Travel for Life scheme (formerly Stars scheme) STARS for primary schools will be renamed TfL Explorers. STARS for secondary schools will be renamed TfL Pioneers. STARS schools implement safer and sustainable travel initiatives, resulting in reductions in car use and increases in walking and cycling on the journey to school as well as more responsible use of public transport. 	Independent Travel, Streets & Environment	Programme to start September 2024	Increases awareness of air quality as an issue and can increase support for measures to improve air quality and public health, e.g. smarter travel and reduced idling. Protect children from the effects of poor air pollution around schools	STARS accreditation KPIs: No. TfL Explorers No. TfL Pioneers No. Schools achieved or working towards accreditation	The Council to encourage more schools to join the TfL Travel for Life scheme. TfL Explorers for primary schools. TfL Pioneers for secondary schools
Page 267	 16.Air quality in and around schools, and extending schools audits to all polluted schools (and potentially to other vulnerable groups, such as nurseries) Protect Croydon's schoolchildren by reducing their exposure to poor air quality. One of the programmes delivered to support this is the schools audit programme to identify measures to reduce pollution in and around the top of Croydon's most polluted schools. This includes Idling Vehicle projects in school streets 	Pollution Team	Programme to start September 2024	The air quality audits identify measures to reduce pollution in and around Croydon's most polluted schools. Schools projects can help to reduce exposure and emissions and help target one of the most vulnerable groups. The council will continue to undertake idling vehicle patrols around schools and enforcement where complaints have been received. An application for funding to continue raising awareness around schools and	No. of school streets implemented No. Air quality audits No. Cycle improvements No. Air quality monitoring units extended	Winterbourne Junior Girls' School has succeeded in gaining bronze accreditation and is now moving forward towards silver. To undertake air quality audits at 10 schools per year to do more to protect London's schoolchildren by reducing their exposure to poor air quality.

	idling has been submitted for MAQF.	

Delivery servicing and freight

The aim is reduce emissions from freight by encouraging a switch to lower emission vehicles, adopting smarter practices and reducing freight movements by better use of consolidated trips.

This work is primarily led by Independent Travel, Streets & Environment

J	Delivery servicing and freight	Lead Services Organisations	Timescale	Why is Croydon Council doing this and what will it achieve?	Outputs, Targets and KPI	Actions
	 17.Update of Procurement policies to reduce pollution from logistics and servicing. Boroughs carry out a number of high value procurements and so have a role to play in addressing emissions from vehicles used in the delivery of products/services they procure. Procurement policies which favour the use of sustainability could also act as a catalyst to change the market, by prioritising companies who incorporate sustainable measures 	Procurement/ Development Planning	September 2024	Procurement should be using their procurement policy and purchasing power to influence and incentivise suppliers to use cleaner vehicles wherever possible Reducing vehicle movements helps alleviate congestion and improves road safety.	Contracts awarded to external suppliers via Procurement Policy should, where feasible, include a requirement and/or incentives for cleaner vehicles to be used by the supplier in the provision of the service provided.	To work in conjunction with the Council's Procurement Team in respect of sustainable procurement policies.
	18.Reducing emissions from deliveries to local businesses and residents. Almost all of London's freight is carried by road using diesel vehicles. Freight activity accounts for around a	Independent Travel, Streets & Environment	Ongoing	The aim is to reduce emissions from freight by encouraging a switch to lower emission vehicles, adopting smarter practices and	Involvement in providing comments on potential updates to procurement policies to seek to reduce pollution	The aim is to reduce emissions from freight by encouraging a switch to lower emission vehicles, adopting smarter practices and reducing freight

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Delivery servicing and freight	Lead Services Organisations	Timescale	Why is Croydon Council doing this and what will it achieve?	Outputs, Targets and KPI	Actions
fifth of motor traffic in London. D the morning peak in central Lon- this increases, so freight accour around a third of the total traffic.	don hts for		reducing freight movements by better use of consolidated trips In addition reducing vehicle movements helps alleviate congestion and improves road safety	from logistics	movements by better use of consolidated trips
19.Reducing emissions from council fleets. The Mayor for London Transpor Strategy (MTS) states that the M and associated organisations wi seek to make London's transpor network zero carbon by 2030. T will also further improve air qual To reach this ambitious target, the GLA group, TfL and other public sector groups must lead by example	Лауог ill rt his ity. he c-	Ongoing	It is important for boroughs to be leading by example and fleets are directly within the control of the council.	Target: No. EV to vehicle fleet No. EVCP's (electric vehicle charging points) implemented	To work with Procurement to ensure that the council is working towards network zero carbon by 2030

Borough Fleet Actions

The London Mayor's Transport Strategy (MTS) states that the London Mayor and associated organisations will seek to make London's transport network zero carbon by 2050. This will also further improve air quality. To reach this ambitious target, the GLA group, TfL and other public-sector groups must lead by example in the use of Ultra Low Emission Vehicles. Where possible, boroughs should examine the feasibility of updating their fleet with alternatively fuelled vehicles; hydrogen, electric, hybrid and bio-methane vehicles.

Boroughs should also seek to re-train fleet drivers to ensure vehicles are driven in the most low-emitting and fuel-efficient manner possible.

Borough Fleet Actions/ Reducing emissions from council fleets	Lead Services Organisations	Timescal e	Why are we doing this and what will it achieve?	Outputs, Targets and KPI	Actions
20.Increasing the number of hydrogen, electric, hybrid, bio-methane and petrol vehicles in the Borough's fleet This is complex and there are different needs for each borough.	Independent Travel / Strategic Transport	Ongoing	Boroughs can work with leasing companies to gain value for money for cleaner commercial vehicles, and funding may be available to assist (such as from The Office for Low Emission Vehicles (OLEV). Electric vehicles are also cheaper to run so the higher capital costs can sometimes be negated. Smarter Driver Training for drivers of vehicles in the borough's own fleet i.e. through training of fuel-efficient driving and providing regular re- training of staff	KPI: Total No. of training sessions carried out	To investigate the use vehicle telematics to monitor driver behaviour. This highlights speeding, harsh driving, idling etc. This information is then fed back to drivers to improve driver behaviour

Localised Solutions

There are a number localised solutions to improve air quality such as Green Infrastructure (GI).

Green Infrastructure is moderate in terms of concentration benefits but does have a number of co-benefits and funding can be sourced through a variety of schemes.

Localised Solution	Lead Services Organisation s	Timescal e	Why are we doing this and what will it achieve?	Outputs, Targets and KPI	Actions
 21.Green infrastructure (GI) Green Infrastructure influences pollution dispersal and deposition. GI interacts with pollution formation and removal at regional and local scales. If designed properly, GI can help to mitigate poor air quality on a local-scale. It should be noted however that GI can never remove all the pollutants from air. It also becomes less and less efficient the further away it is from sources of pollution. There is a commitment by the London Mayor to make London at least 50 per cent green by 2050. 	Pollution Team/ Spatial Planning	Ongoing	Green infrastructure schemes can transform urban areas and help improve public spaces. However, it can be hard to quantify their effectiveness in terms of reducing emissions.	The council to develop GI targets. Total No. Trees planted	Spatial Planning confirmed planning guidance has been reviewed on the All London Green Grid. To investigate increasing number of trees and Green Infrastructure There are cost implications for the ongoing maintenance of any green infrastructure so it is important that any schemes include these measures

Cleaner Transport

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It is well documented that road traffic emissions are one of the main sources of air pollution in London. It is therefore vital that there is effective communication between those managing air quality issues with boroughs and those managing traffic and travel.

Boroughs should ensure that internal transport teams are fully aware of the air quality issues affecting London, and that formal regular communication channels are in place.

Effective communication between teams could be achieved several ways, including: • Heads of Transport should sign off AQAPs and review them annually. • Air quality risks should be fully evaluated in all transport feasibility studies and proposals. • Provision of regular briefings to the Transport Team on local air quality issues and projects, and the location of hotspots/Focus Areas. • Making a requirement for an air quality official to attend transport steering groups, and vice versa. • Incorporating quality based targets within specific Transport job roles, ensuring accountability and delivery.

Cleaner Transport	Lead Services Organisatio ns	Timescal e	Why is Croydon Council doing this and what will it achieve?	Outputs, Targets and KPI	Actions
22.Ensuring that Transport and Air Quality policies and projects are integrated	Pollution Team / Strategic transport	Ongoing	To reduce air pollution levels To reduce carbon emissions To improve the walking and cycling environment Enhanced commercial environment	Target: 100% of AQ and Transport policies and projects to be integrated. Target: 100% of major road schemes to include integrated air quality monitoring	 Examples of current integrated policies include policies on school travel plans, school streets, modal shift to walking and cycling, emissions-based parking charges that promote cleaner vehicles and electric vehicles Effective communication between teams could be achieved several ways, including: Heads of Strategic Transport and Highways and Parking will be consulted on and involved withthe monitoring and review of the AQAP. Air quality risks should be fully evaluated in all transport feasibility studies and proposals. Provision of regular briefings to the Transport Team on local air quality issues and projects, and the location of hotspots/Focus Areas. Air quality officer to share minutes and vice versa.

23. Discouraging unnecessary idling by taxis and other vehicles Pollution Ongoing It is an easy action for people to take to reduce completely unnecessary emissions. Under Regulation 98 of The Road Vehicles (Construction and Use) Regulations 1986, it is an offence to leave a vehicle engine running unnecessarily while that vehicle is stationary on the roadside. Target: 75% AQ hot spots have anti-idling signage. Since 2002, under Regulation 12 of The Road Traffic (Vehicle Emissions) (Fixed Penalty) (England) Regulations 2002, Local Authorities have been given the powers to enforce the switching off of engines when vehicles are stationary on the roadside. This enables local authorities to issue a Fixed Penalty Notice (PN) of £20 to a driver who is committing an offense by idling their vehicle's engine. Aside from enforcing idling by	neasures. undertake proactive and reactive idling vehicle visits and will co-

Cleaner Transport	Lead Services Organisatio ns	Timescal e	Why is Croydon Council doing this and what will it achieve?	Outputs, Targets and KPI	Actions
			the Road Traffic Regulation Act 1984, so that traffic enforcement officers within the local authority are able to issue Penalty Charge Notices (PCNs) of £80 for idling vehicles. In addition, Rule 123 of the Highway Code states drivers must not leave a parked vehicle unattended with the engine running or leave a vehicle engine running unnecessarily while it is stationary on a public road. Existing projects have found that drivers turned off engines when asked and there was no need to issue FPN's (fixed penalty notices). The number of reports of idling vehicles reduced as a result and the project was considered a success.		

Cleaner Transport	Lead Services Organisatio ns	Timescal e	Why is Croydon Council doing this and what will it achieve?	Outputs, Targets and KPI	Actions
24.Using parking charges to incentivise the use of lower emission vehicles	Highways & Parking Services	Autumn 2024	Vehicle journeys are critical to the vitality of the borough. It is important that we take a balanced approach so these journeys have the minimum impact on the borough.	Target: 100% of car clubs to be EV (proportional to demand)	Assess how revised parking charges have impacted on willingness to use cleaner vehicles, including the reduction of discounts proposed for these vehicle types. Ensure that planning and parking policy continually meets evolving needs, including Car Clubs & Electric Vehicle Parking Points.
25.Assess the potential of intensifying Electric Vehicle Infrastructure (electric vehicle charging points, rapid electric vehicle charging point and hydrogen refuelling stations)	Independent Travel/ Strategic Transport	Ongoing	To succeed in making the transition to electric vehicles, Croydon needs a major expansion in electric charging and possibly hydrogen infrastructure. Reduces emissions and helps raise awareness of and familiarity with EV's amongst a broader audience.	Target: Subject to demand assessments, Increase number of electric vehicle charging points No. by 2026	To assess the demand for electric vehicles and charging points where required. Develop a policy which allows for further growth in electric vehicle charging points when a certain number of electric vehicles are registered in an area allows for continued growth of the new technology.
26.Provision of infrastructure to enable Active Travel measures The 'Neighbourhoods Approach' is a	Highways & Parking Services	Ongoing	Better walking and cycling environments can connect communities and provide a welcoming and inclusive city for everyone.	 Target: Deliver walking & cycling measures. Cycling infrastructure eg. increase number of cycle hangars in the borough. 	 Via the Local Implementation Plan (LIP) the intention is to encourage Sustainable and Active travel. Improve the flow of people and goods into and out of the town centre

Cleaner Transport	Lead Services Organisatio ns	Timescal e	Why is Croydon Council doing this and what will it achieve?	Outputs, Targets and KPI	Actions
framework that puts people and their health at the heart of the decision making, helping everyone to use cars less and to walk, cycle and use public transport more.			Investing in walking and cycling infrastructure enables increased activity levels amongst local communities. This provides benefits for individual health, the NHS, and for transport as a whole. Research shows that if every Londoner walked or cycled for 20 minutes a day, it could save the NHS £1.7bn in treatment costs over the next 25 years. Encourages more active travel which has a positive impact on public health (reduced rates of depression, dementia and hip fractures, amongst other benefits) and can reduce dependency on cars, improving local air quality.	Annually. Target: Improve pedestrian experience in town centres to make walking to amenities more attractive. Target: Ensure active travel is included in new developments.	 Prioritise the access and safety of vulnerable road users (people with disabilities, cyclists, pedestrians) Improve bus, tram and taxi access Improve delivery and customer access for businesses Improve the quality of life for residents. Improve the environment Improve the environment Improve air quality Discourage short car journeys. Reduce the dependence on the private motor vehicle to access London Road

Equality Analysis Form



Introduction 1.

1.1 **Purpose of Equality Analysis**

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

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

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

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

- Policies, strategies and plans; •
- Projects and programmes;
- Page Commissioning (including re-commissioning and de-commissioning);
 - Service review:
 - Budget allocation/analysis;
- Staff restructures (including outsourcing); ∞
 - Business transformation programmes; ٠
 - Organisational change programmes; ٠
 - Processes (for example thresholds, eligibility, entitlements, and access criteria. ٠

2. **Proposed change**

Directorate	Sustainable Communities Regeneration & Economic Recovery
Title of proposed change	This is an update of the previous Air Quality Action Plan 2017- 2022. The updated Air Quality Delivery Plan will cover from 2024- 2029.

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

Air quality is an important public health issue in Croydon, it contributes to reduced life expectancy and disproportionately impacts on the most vulnerable people, in particular the young and elderly.

The aim of the Air Quality Delivery Plan 2023-2029 is to put measures in place to improve the health and wellbeing of everyone living and working in Croydon.

Our key priorities for 2024 – 2029 are:-

- Work towards the 2005 WHO guidelines for PM2.5 with a target of compliance deadline by 2030, and review the emerging policies from the GLA in respect of the 2021 WHO guidelines
- Increase the network of air quality monitoring across the borough;
- Continue to engage schools with the introduction of Croydon Healthy School Streets (this can include, traffic calming measures, Air ٠ Quality audits and increase of green infrastructure working with Trees for Cities).
- Ensure enforcement of Non-Road Mobile Machinery (NRMM) air quality policies in Croydon.
- Reduce emissions from wood burning
- Page Minimise emissions from construction and develop Section 106 guidance for air guality and planning; 279
 - Continue to raise awareness and encourage behaviour changes through air quality campaigns;
 - Assess potential impact of installing Ultra-Low Emission Vehicle (ULEV) infrastructure (Increase uptake of electric vehicles and ensure electric vehicle charging infrastructure provision and maintenance keeps pace with growth in Croydon)
 - Reduce emissions from wood burning reduce particulate emissions from wood burning in the home by an awareness campaign ٠
 - Develop a Fleet Strategy address the wider role of Fleet within the services which the Council provides; ٠
 - Provide new cycling and walking infrastructure and assess air quality impacts of new infrastructure.

Impact of the proposed change 3.

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

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

3.1 Deciding whether the potential impact is positive or negative

Table 1 – Positive/Negative impact

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

Protected characteristic group(s)	Positive impact	Negative impact	Source of evidence
Age	Air pollution is recognised as a contributing factor in the onset of heart disease and cancer. Additionally, air pollution particularly affects the most vulnerable in society: children and older people, and those with heart and lung conditions.	Not applicable	Air quality and social deprivation in the UK: an environmental inequalities analysis, 2006. Defra. Air Pollution: Action in a Changing Climate, March 2010
Disability	Air pollution is recognised as a contributing factor in the onset of heart disease and cancer and particularly affects the most vulnerable in society.	Not applicable	Air quality and social deprivation in the UK: an environmental inequalities analysis, 2006. Defra. Air Pollution: Action in a Changing Climate, March 2010
Sex	It is noted that adverse effects of air pollution seem to be greater in men in lower social classes.	Not applicable	Air quality and social deprivation in the UK: an environmental inequalities analysis, 2006.

Gender Reassignment	Croydon is committed to reducing the exposure of all people in Croydon to poor air quality in order to improve health.	Not applicable	Air quality and social deprivation in the UK: an environmental inequalities analysis, 2006. Defra. Air Pollution: Action in a Changing Climate, March 2010
Marriage or Civil Partnership	Croydon is committed to reducing the exposure of all people in Croydon to poor air quality in order to improve health.	Not applicable	Air quality and social deprivation in the UK: an environmental inequalities analysis, 2006. Defra. Air Pollution: Action in a Changing Climate, March 2010
Religion or belief	Croydon is committed to reducing the exposure of all people in Croydon to poor air quality in order to improve health.	Not applicable	Air quality and social deprivation in the UK: an environmental inequalities analysis, 2006. Defra. Air Pollution: Action in a Changing Climate, March 2010
Race	Research shows that those exposed to the worst air pollution are more likely to be deprived Londoners and from Black, Asian and Minority Ethnic communities.	Not applicable	https://www.london.gov.uk/what- we-do/environment/pollution- and-air-quality/air-pollution-and- inequalities-london-2019
Sexual Orientation	Croydon is committed to reducing the exposure of all people in Croydon to poor air quality in order to improve health.	Not applicable	Air quality and social deprivation in the UK: an environmental inequalities analysis, 2006. Defra. Air Pollution: Action in a Changing Climate, March 2010
Pregnancy or Maternity	Epidemiological data associates air pollution exposure during pregnancy with adverse outcomes such as preterm birth (<37 weeks of gestation) (11, 12), low birth weight (< 2500 g at birth) (13), miscarriage (14), preeclampsia and hypertensive disorders of pregnancy	Not applicable	Cellular mechanisms linking to outdoor and indoor air pollution damage during pregnancy 2023

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

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

3.2 Additional information needed to determine impact of proposed change

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

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

Additional information needed and or Consultation Findings	Information source	Date for completion

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

3.3 Impact scores

<u>Example</u>

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

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

	Equality					
act	3	3	6	9	Key Risk Index	Risk Magnitude
Impa					6 – 9	High
<u>_</u>	2	2	4	6	3 – 5	Medium
of					1 – 3	Low
	1	1	2	3		
rity		4		2		
<pre>></pre>		l	2	3		
Severity	Lik	elihood	l of Imp	act		

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

4. Statutory duties

4.1 Public Sector Duties

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

Advancing equality of opportunity between people who belong to protected groups

Eliminating unlawful discrimination, harassment and victimisation

Fostering good relations between people who belong to protected characteristic groups

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

5. Action Plan to mitigate negative impacts of proposed change

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

Table 4 – Action Plan to mitigate negative impacts

Complete this table to show any negative impacts identified for service users and/or staff from protected groups, and planned actions mitigate them.				
Protected characteristic	Negative impact	Mitigating action(s)	Action owner	Date for completion
Disability				
Race				
Sex (gender)				
Gender reassignment				
Sexual orientation				
Age				

Religion or belief		
Pregnancy or maternity		
Marriage/civil partnership		
6. Decision on the proposed change		

Decision	information outlined in this Equality Analysis enter X in column 3 (Conclusion) alongside the relevant statement to show your Definition	Conclusion - Mark 'X' below
No major change	Our analysis demonstrates that the policy is robust. The evidence shows no potential for discrimination and we have taken all opportunities to advance equality and foster good relations, subject to continuing monitoring and review. The Air Quality Delivery Plan 2024-2029 requires the Council to take positive steps to tackle the effects of poor air quality in the borough. The measures to be taken will have a positive impact on all communities and there is no group with a protected characteristic that will be negatively impacted by the actions in the plan.	X
Adjust the proposed change	We will take steps to lessen the impact of the proposed change should it adversely impact the Council's ability to meet any of the Public Sector Duties set out under section 4 above, remove barriers or better promote equality. We are going to take action to ensure these opportunities are realised. If you reach this conclusion, you must outline the actions you will take in Action Plan in section 5 of the Equality Analysis form	
Continue the proposed change	We will adopt or continue with the change, despite potential for adverse impact or opportunities to lessen the impact of discrimination, harassment or victimisation and better advance equality and foster good relations between groups through the change. However, we are not planning to implement them as we are satisfied that our project will not lead to unlawful discrimination and there are justifiable reasons to continue as planned. If you reach this conclusion, you should clearly set out the justifications for doing this and it must be in line with the duty to have due regard and how you reached this decision.	
Stop or amend the proposed change	Our change would have adverse effects on one or more protected groups that are not justified and cannot be mitigated. Our proposed change must be stopped or amended.	

Will this decision be considered at a scheduled meeting? e.g. Contracts and	Meeting title: The AQAP will be considered by Cabinet
Commissioning Board (CCB) / Cabinet	Date: 15 May 2024

7. Sign-Off

	Officers that must approve this decision		
	Equalities Lead	Name: Ken Orlukwu	Date: 02/05/2024
	·		
		Position: Senior Equalities Officer	
D			
Ž	Director	Name: Karen Agbabiaka	Date: 2 May 2024
U N			
20		Position: Director of Streets & Environment	

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