

## Crawley Borough Council

### Cabinet

Agenda for the **Cabinet** which will be held in **Committee Rooms A and B - Town Hall**, on **Wednesday, 15 January 2025 at 7.00 pm**

Nightline Telephone No. 07881 500 227



**Chief Executive**

**Membership:** Councillors

M G Jones (Chair)	Leader of the Council
I T Irvine	Cabinet Member for Housing
Y Khan	Cabinet Member for Public Protection
C J Mullins	Cabinet Member for Leisure and Wellbeing
S Mullins	Cabinet Member for Community Engagement and Culture
A Nawaz	Deputy Leader of the Council & Cabinet Member for Planning and Economic Development
B Noyce	Cabinet Member for Environment, Sustainability and Climate Change
T Rana	Cabinet Member for Resources

Please contact Democratic Services if you have any queries regarding this agenda.  
[democratic.services@crawley.gov.uk](mailto:democratic.services@crawley.gov.uk)

Published 23 December 2024



01293 438000

[crawley.gov.uk](http://crawley.gov.uk)  
[democracy.crawley.gov.uk](http://democracy.crawley.gov.uk)

Town Hall  
The Boulevard  
Crawley  
West Sussex  
RH10 1UZ

Committee meetings are live streamed via the Council's YouTube channel:  
<https://www.youtube.com/crawleybc>.

Please note that the comment function will be unavailable.

---

**The order of business may change at the Chair's discretion**

## **Part A Business (Open to the Public)**

	<b>Pages</b>
<b>1. Apologies for Absence</b>	
<b>2. Disclosures of Interest</b>	
In accordance with the Council's Code of Conduct, councillors are reminded that it is a requirement to declare interests where appropriate.	
<b>3. Minutes</b>	5 - 18
To approve as a correct record the minutes of the Cabinet held on 27 November 2024.	
<b>4. Public Question Time</b>	
To answer any questions asked by the public which are relevant to the functions of the Cabinet.	
Public Question Time will be concluded by the Chair when all questions have been answered or on the expiry of a period of 15 minutes, whichever is the earlier.	
<b>5. Further Notice of Intention to Conduct Business in Private and Notifications of any Representations</b>	
The Monitoring Officer will report on any responses to representations received in relation to why item(s) 11: <i>Disposal of General Fund Parcel of Land to Raise a Capital Receipt</i> should not be held in Part B Business – (Closed to the Public).	
<b>6. Matters referred to the Cabinet and Report from the Chair of the Overview and Scrutiny Commission</b>	
To consider any matters referred to the Cabinet (whether by a scrutiny committee or by the Council) and those for reconsideration in accordance with the provisions contained in the Scrutiny Procedure Rules, the Budget Procedure Rules and the Policy Framework Procedure Rules set out in Part 4 of the Council's Constitution.	

	<b>Pages</b>
<p><b>7. Housing Policies: (Compensation, Short-term Alternative Accommodation, Stock Condition, CCTV)</b></p> <p>Housing Portfolio</p> <p>To consider report CH/211 of the Head of Crawley Homes, which was referred to the meeting of the Overview and Scrutiny Commission on 13 January 2025.</p>	19 - 106
<p><b>8. Community Infrastructure Levy (CIL) Strategic Infrastructure Strand Review</b></p> <p>Planning and Economic Development Portfolio</p> <p>To consider report PES/470 of the Head of Economy and Planning.</p>	107 - 136
<p><b>9. Supplemental Agenda</b></p> <p>Any urgent item(s) complying with Section 100(B) of the Local Government Act 1972.</p>	
<p><b>10. Exempt Information – Exclusion of the Public (Subject to Agenda Item 5)</b></p> <p>The Committee is asked to consider passing the following resolution:- That under Section 100A (4) of the Local Government Act 1972 the public be excluded from the meeting for the following item of business on the grounds that it involves the likely disclosure of exempt information as defined in Part 1 of Schedule 12A of the Act by virtue of the paragraphs specified against the item.</p>	
<b>Part B Business (Closed to the Public)</b>	
<p><b>11. Disposal of General Fund Parcel of Land to Raise a Capital Receipt</b></p> <p>The Leader’s Portfolio</p> <p>Exempt Paragraph 3 Information relating to the financial or business affairs of any particular person (including the authority holding that information)</p> <p>To consider report FIN/681 of the Head of Corporate Finance.</p>	137 - 140

**This information is available in different formats and languages. If you or someone you know would like help with understanding this document please contact the Democratic Services team on 01293 438549 or email: [democratic.services@crawley.gov.uk](mailto:democratic.services@crawley.gov.uk)**

This page is intentionally left blank

# Agenda Item 3

Cabinet (23)  
27 November 2024

Crawley Borough Council

## Minutes of Cabinet

Wednesday, 27 November 2024 at 7.00 pm

### Councillors Present:

M G Jones (Chair)	Leader of the Council
I T Irvine	Cabinet Member for Housing
Y Khan	Cabinet Member for Public Protection
C J Mullins	Cabinet Member for Leisure and Wellbeing
S Mullins	Cabinet Member for Community Engagement and Culture
B Noyce	Cabinet Member for Environment, Sustainability and Climate Change
T Rana	Cabinet Member for Resources

### Also in Attendance:

Councillor M L Ayling, D Crow and J Russell

### Officers Present:

Siraj Choudhury	Head of Governance, People & Performance
Ian Duke	Chief Executive
Carolin Martlew	Head of Corporate Finance
Chris Page	Deputy Chief Executive
Chris Pedlow	Democracy & Data Manager
Vicki Basley	Chief Accountant
Nigel Sheehan	Head of Major Projects and Commercial Services
Paul Baker	Partnership Services Manager
Philip Morris	Sustainability Manager
Clem Smith	Head of Economy and Planning

### Apologies for Absence:

Councillor A Nawaz

#### 1. Disclosures of Interest

No disclosures of interests were made.

#### 2. Minutes

The minutes of the meeting of the Cabinet held on 6 November 2024 were approved as a correct record and signed by the Leader of the Council.

### 3. Public Question Time

There were no questions from the public.

### 4. Further Notice of Intention to Conduct Business in Private and Notifications of any Representations

It was reported that no representations had been received in respect of agenda item 17, *Waste and Recycling: Changes to Collection Regime and Extension of Waste and Recycling Contract*.

### 5. Matters referred to the Cabinet and Report from the Chair of the Overview and Scrutiny Commission

It was confirmed that no matters had been referred to the Cabinet for further consideration.

### 6. Waste and Recycling Scrutiny Panel Final Report

The Chair of the Waste and Recycling Scrutiny Panel, Councillor Russell, presented report [OSC/325](#). A Notice of Motion at Full Council in October 2023 proposed setting up a Scrutiny Panel to examine and seek to improve Crawley's household waste recycling rate, taking into account the differing challenges the Borough had in comparison to other areas. A Waste and Recycling Scrutiny Panel was subsequently established in February 2024 to look at how household waste recycling rates in Crawley could be improved. Alongside consideration of options to improve recycling performance, the National Waste and Resources Strategy, *Simpler Recycling*, was launched in October 2023 and, amongst other proposals, confirmed that waste collection authorities will be obliged to move to a separate weekly food waste collection with effect from April 2026. Within this context, a focus for the Panel was to consider the efficacy and impact of different collection regime options open to the Council in implementing the National Waste Strategy.

The Panel wished to consider how to maximise impact while recognising budget constraints, and the demographic and social economic context which typically influences recycling behaviour and performance. Within this context, the Panel sought to "find ways to understand impediments to recycling in the Borough and also consider ways to inform residents/customers of proposed changes to waste collection and incentivise to maximise levels of recycling".

Councillor Ayling presented the Overview and Scrutiny Commission's [comments](#) on the report to the Cabinet following consideration of the matter at its meeting on 25 November 2024. The key points raised included recognising that recycling within blocks of flats presented a number of challenges and, as a result, any rollout of food waste bins/caddies should be a phased approach based on the style of properties. It was recognised that clear, strong communications regarding recycling and any proposed changes would be key in order to incentivise and encourage residents to

# Agenda Item 3

Cabinet (25)  
27 November 2024

increase recycling and minimise food waste and there were many different communication channels. It was acknowledged that, as with any change, it would take a while to adapt.

The Commission amended recommendation 2.2b) to 'recycling and waste' in order to mirror the proposed changes in recommendation 2.2a, in which the website had been re-named 'Recycling and Waste', in order to place recycling at the forefront and thus refocus priorities.

Councillor Crow was invited to speak on the item. Matters raised included that the suggestion for a working group, which ended up being the Scrutiny Panel, came from a Notice of Motion he put forward to Full Council to investigate what could be done to address Crawley's poor recycling rates compare to the rest of the West Sussex authorities. In response to Councillor Crow's comments it was highlighted that, within sections 6.8 to 6.10, the report showed that Crawley's recycling rates were certainly comparable, if not better, than other a similar Councils with an urban make up and similar collection regimes.

Councillors Irvine, S Mullins, Rana, C Mullins, Jones and Noyce all spoke as part of the discussion on the report. The Cabinet thanked Councillor Russell and the Panel for their hard work, sensible and well justified recommendations, and they were happy to accept the proposed change raised by the Commission.

## **RESOLVED**

That the Cabinet accepts and notes the recommendations from Waste and Recycling Scrutiny Panel as detailed below within the context of the *Waste and Recycling: Changes to Collection Regime and Extension of Waste and Recycling Contract* exempt report (HPS/045) and:

- a) approves the rename the current Council's website link to 'Recycling and Waste'.
- b) requests that the Cabinet Member for Environment, Sustainability and Climate Change investigate the Junior Citizen event which covers 'waste and the environment' to consider expanding this further to cover 'recycling and waste'.
- c) recognises that, from other authorities' experience, implementing a separate food waste collection service at flats presents logistical challenges and careful consideration will need to be given to support take up and participation at these properties; and authorise officers to explore the use of different collection methods for flats, including the use of reusable bags and/or "smart clear sacks".
- d) for the majority of households, supports the continued use of a 140ltr residual waste bin and existing exceptions policy as a means of encouraging use of the separate food waste bin and recycling bins.
- e) recognises that a rollout of two or more phases may be required to take into account varying requirements of different property types, as well as balancing available resource and the lead-in time for delivery of food waste vehicles and food waste bins.

# Agenda Item 3

Cabinet (26)  
27 November 2024

- f) approves that the waste and recycling service engages with residents as part of any changes to the service roll out including agreeing where bins will be sited where different options may exist for their placement.
- g) confirms it will investigation of the options, of separate weekly food waste collection and fortnightly residual waste collection, as supported by the Scrutiny Panel, and noting the changes proposed in the National Waste Strategy and the potential for changes to the collection regime to significantly impact upon recycling performance.
- h) approves that a clear and consistent communications campaign supports the role out of the separate food waste collection and any subsequent changes in the collection regime. As part of this messaging highlight the waste hierarchy of ‘reduce, reuse and recycle’ whilst ensuring that communications are easy to understand and include the message about the cost, importance of recycling to incentivise and engage residents along with contact details for bulky waste collection and fly tipping; and confirms it will consider utilising the following mediums to promote communications:
- Wrap around signs on vehicles (as per standard approach)
  - Standard information bins (“bin hangers” as per standard approach)
  - myCrawley
  - Crawley Live
  - Early promotion in Christmas 2025 collection.
  - Council Tax billing in advance in April 2026.
  - All social media to feature notification of changes.

## Reasons for the Recommendations

To investigate how household waste recycling rates in Crawley could be improved and in particular to ensure the implementation of revised collection arrangements under Simpler Recycling will help to provide a step change in recycling performance across the town.

## 7. Tenancy Strategy 2025 - 2029

The Cabinet Member for Housing presented report [SHAP/091](#) of the Head of Strategic Housing. The report sought approval of the new Tenancy Strategy.

Councillor Ayling presented the Overview and Scrutiny Commission’s [comments](#) on the report to the Cabinet following consideration of the matter at its meeting on 25 November 2024, which included recognition that the Strategy incorporated the recommendations from the Housing Associations Scrutiny Panel which was conducted in 2024 and it was noted that Housing Associations were regulated by the Regulator of Social Housing (RSH). The Council had no regulatory powers over the activities of Housing Associations operating within Crawley.



# Agenda Item 3

Cabinet (27)  
27 November 2024

The Commission recommended that Cabinet be requested to amend Section 3 of the Tenancy Strategy (Council Approach) to provide further clarity upon timescales ‘households may wait “many years” for an offer of suitable housing’. (Suggested amendments in bold to provide further information): ‘households may wait **several** years for an offer of **social housing (dependent on their priority and the availability of properties they are eligible for)**’.

Councillors S Mullins and Jones spoke as part of the discussion on the report and in support of the proposed Strategy. Councillor Irvine responded to the Commission’s proposal, confirming he was happy to accept their proposed amendment to the Strategy.

## RESOLVED

That Full Council be recommended to approve and adopt of the Tenancy Strategy 2025 to 2029 (Appendix A of report [SHAP/091](#)) to commence from 1 January 2025, subject to that within Section 3.0 Council approach, that the final line in the penultimate paragraph be changed to read:

*‘There are now over 2,500 households on the housing register, and due to the increased demand for housing and reduced supply, households may wait several years for an offer of social housing (dependent on their priority and the availability of properties they are eligible for).’.*

## Reasons for the Recommendations

To fulfil the Council’s legal duty to publish a Tenancy Strategy to set out matters to which registered providers are to have regard to when formulating their own tenancy policies.

## 8. Homelessness Review and Homelessness Strategy 2025 to 2029

The Cabinet Member for Housing presented report [SHAP/092](#) of the Head of Strategic Housing. The report sought approval of the new Homelessness and Rough Sleeping Strategy. In presenting the proposed Strategy, the Cabinet Member informed the Cabinet of the four priorities, namely, prevention and early intervention, maximising the supply of suitable accommodation, tackling rough sleeping and single homelessness, and preventing repeat homelessness.

Councillor Ayling presented the Overview and Scrutiny Commission’s [comments](#) on the report to the Cabinet following consideration of the matter at its meeting on 25 November 2024, which included noting that the new Strategy strengthens the focus of prevention and up-streaming work to develop more early intervention strategies in order to prevent crisis and increase the resilience of residents in the Borough. Also, that the funding for the Rough Sleeping Multi-Disciplinary Team would not be known until the end of the year at the earliest. The Commission had sought clarification regarding the Renters’ Rights Bill, which could potentially bring changes such as ‘no fault’ evictions and its potential impact on homelessness.

Councillors S Mullins, Rana, C Mullins and Jones spoke as part of the discussion on the report and Strategy.

## RESOLVED

That Full Council be recommended to approve and adopt of the Homelessness and Rough Sleeping Strategy 2025 to 2029 (Appendix A of report [SHAP/092](#)) to commence from 1 January 2025.

## Reasons for the Recommendations

To fulfil the Council's legal duty to publish a homelessness strategy upon expiry of the previous strategy.

## 9. Updated Climate Emergency Action Plan and Climate Emergency Declaration

The Cabinet Member for Environment, Sustainability and Climate Change presented report [PES/473](#) of the Head of Economy and Planning. The report sought Cabinet approval for an update to the Climate Emergency Action Plan and Climate Emergency Declaration, to include consideration of a nature emergency declaration and an application to join the UK100 network. Full Council will be asked to ratify this decision.

Councillor Ayling presented the Overview and Scrutiny Commission's [comments](#) on the report to the Cabinet following consideration of the matter at its meeting on 25 November 2024, which included that they welcomed the additions of the Declaration of a Nature Emergency.

Councillors S Mullins, C Mullins and Jones spoke as part of the discussion on the report, with them expressing their support for the ambitious targets contained within the updated Action Plan and to the Climate Emergency Declaration. They also declared their support for the inclusion of the Nature Emergency Declaration.

## RESOLVED

That the Cabinet:

- a) approves and adopts the updated Climate Emergency Action Plan (CEAP) structure as set out in Appendix A of report [PES/473](#), whilst noting the implications set out in section 9 of report [PES/473](#).
- b) agrees that the Council applies to be a member of the UK100 organisation, and that this be included in the updated Climate Emergency Declaration, and should the application be successful:
  - i. That the Leader of the Council signs the UK100 membership pledge,
  - ii. That the Cabinet Member for Environment, Sustainability and Climate Change be nominated as the Council's representative to the UK100 organisation, and

- iii. That the above Portfolio Holder Responsibilities be amended to include this appointment within the Constitution.

That Full Council be recommended to approve and adopt the updated Climate Emergency Declaration, which is accompanied by a new declaration of a Nature Emergency (Appendix B of report [PES/473](#)) and the ambition to join UK100.

## Reasons for the Recommendations

The Council is currently committed to reduce all its carbon emissions by 50% by 2030, and to net zero by 2040 at the latest. The proposed updated Declaration would accelerate the reduction of emissions that are under the Council's direct control, whilst allowing more time for reducing the Council's indirect emissions (procured goods and services, and emissions from social housing and commercial leased assets).

Declaring both a 'climate and nature emergency' acknowledges the strong links between climate change, biodiversity loss and air quality, and the Council's responsibility for halting biodiversity loss as defined in the Environment Act 2021. It also acknowledges the recently arisen opportunity for the Council to raise funding through the planning process to invest in Biodiversity Net Gain (BNG) within the borough.

Halting climate change cannot be achieved in isolation, and joining the UK100 organisation will provide opportunities to collaborate with other local authorities in responding to climate change, strengthening the Council's voice in advocating to government for action on climate, and improving its ability to access the funding needed for decarbonisation.

The updated declaration acknowledges the influence that the Council has over emissions and biodiversity across the borough and will help to coordinate action, whilst also acknowledging the dependencies outside of our control.

The updated Climate Emergency Action Plan is more delivery orientated with a clearer pathway for the Council to reduce its own direct carbon emissions to net zero.

## 10. 2024-2025 Budget Monitoring - Quarter 2

The Leader presented report [FIN/672](#) of the Head of Corporate Finance. The report set out a summary of the Council's actual revenue and capital spending for the quarters to September 2024, together with the main variations from the approved spending levels and impact on future budgets. The Cabinet were informed that, in respect of the revenue account, there was a projected surplus of £410k which is a favourable turnaround from the previous quarter and that was mainly due to better than anticipated income from interest on investments, of £2.167m. On the HRA, the predicted overspend at the end of Quarter 2 was £976k compared to £151k at the end of the previous quarter. It was noted that was due to expenditure on responsive repairs.

Councillor Ayling presented the Overview and Scrutiny Commission's [comments](#) on the report to the Cabinet following consideration of the matter at its meeting on 25 November 2024, which included noting that the slippage of the capital programme

# Agenda Item 3

Cabinet (30)  
27 November 2024

(mostly as a result of water neutrality) had resulted in higher balances from higher interest payments, but has impacted our ability to increase the Council's housing supply and ease temporary accommodation pressures. The Commission had sought clarification over planning income, along with the flexible housing support grant and the changes to Right to Buy and had sought additional information on the options considered with regards to Ashdown House which would balance income to be received and the works required.

Councillor Crow was invited to speak on the item. Matters raised including that there had been a significant slippage in the capital programme and that the report indicated that was a result of water neutrality issues. He questioned why that had not been picked up in the capital programme forecasting, as water neutrality was not a new issue. On Ashdown House he asked for reassurance that the proposed capital investment was seen as a good investment longer term compared to disposal.

Both the Leader and Head of Corporate Finance responded to the points raised by Councillor Crow, confirming that, in respect of Ashdown House, all avenues had been considered and the approach highlighted in the report was deemed to be the most adventurous for the Council long term. Officers were constantly keeping a track of our capital programme and the vast majority of the delays were down to the knock on effects of water neutrality issues. Also, it was confirmed that the additional investment income was not purely down to capital slippage but as a result of good long term investment, as shown in the Treasury Management report.

Councillor S Mullins spoke as part of the discussion on the report.

## **RESOLVED**

That the Cabinet:

- a) notes the projected outturn for the financial year 2024/2025 as summarised in report [FIN/672](#).
- b) approves the capital virement of £204k from the ICT Replacement Reserve to the People Systems Programme (PSP) project.
- c) approves the capital virement of £550k from the Green Tech Business Grants project to the Innovation Centre Project within the Towns Fund programme.
- d) approves the delegation to the Head of Corporate Finance, in consultation with the Leader to approve a capital virement from the property reserve to cover the costs of fit out and related work at Ashdown House, up to the limit of £1.3m (as detailed in paragraph 8.8 of report [FIN/672](#)).

## **Reasons for the Recommendations**

To report to Members on the projected outturn for the year compared to the approved budget.

## 11. Budget Strategy 2025/26 – 2027/28

The Leader presented report [FIN/673](#) of the Head of Corporate Finance. The report set out future financial projections along with the policy framework for improving financial efficiency and meeting the long term investment needs of the Town, as well as proposals for the annual budget process.

Councillor Ayling presented the Overview and Scrutiny Commission's [comments](#) on the report to the Cabinet following consideration of the matter at its meeting on 25 November 2024, which included, acknowledging that some fees and charges may have to be increased by more than CPI to help close the budget gap and ensure that services were operating more closely to a cost recovery basis where possible, and noting that fees and charges would be applied proportionally as possible but were currently under review as part of the budget process. The Commission had noted there was a proposed amendment in recommendation 2.2 ciii to specify the Council Tax Banding in report [FIN/673](#), with the revised wording as follows (in bold):

*“The current budget deficit of £2.452m for 2025/26 (section 6.2 of report [FIN/673](#)) is based on a Council tax increase of 2.99% which is £6.94 **per band D dwelling**. Table 2 (section 6.6.10 of report [FIN/673](#)) highlights the budget gap modelling different assumptions”.*

The Leader confirmed that he was happy to accept the additional wording to recommendation 2.2 ciii.

### RESOLVED

That the Full Council be recommended to:

- a) agrees the overall approach to the Budget Strategy 2025/26 to 2027/28 as set out in section 8 of report [FIN/673](#).
- b) approves the minimum recommended General Fund Balance remains at £3m.
- c) notes the following highlights of the Budget Strategy:
  - i. That the Budget is aligned to the Council's Corporate Priorities.
  - ii. The outline 3 year forecast as shown in table 2 paragraph 6.1 of report [FIN/673](#)., this is likely to be subject to significant change depending on the outcome of the Local Government Finance Settlement for 2025/26 and the Spending Review Phase two reforms for the period 2026/27 and beyond.
  - iii. The current budget deficit of £2.452m for 2025/26 (section 6.2 of report [FIN/673](#).) is based on a Council tax increase of 2.99% which is £6.94 per band D dwelling. Table 2 (section 6.6.10 of report [FIN/673](#).) highlights the budget gap modelling different assumptions.
  - iv. The forecast does not include any fundamental changes in service delivery as these would be too speculative in nature at this stage.

- v. That there are significant uncertainties around Government funding prior to the settlement in December 2024 and that this uncertainty increases from 2026/27 due to Spending Review Phase 2 including the anticipated reset of the business rates.

## **Reasons for the Recommendations**

To agree the Council's Budget Strategy for 2025/26 to 2027/28 including the assumptions made which will set the budget parameters for 2025/26.

The 2025/26 General Fund and Housing Revenue Account Budgets and the revised capital programme will be set by the Full Council in February 2025. The Treasury Management Strategy and Capital Strategy will be considered at the same meeting.

To note that until the provisional Local Government Finance Settlement is published in December 2024 these projections are highly likely to change.

## **12. Treasury Management Mid Year Review 2024-2025**

The Leader presented report [FIN/674](#) of the Head of Corporate Finance. The report provided an update on the Council's Treasury Management Strategy for 2024-2025.

Councillor Ayling presented the Overview and Scrutiny Commission's [comments](#) on the report to the Cabinet following consideration of the matter at its meeting on 25 November 2024, which included requesting that descriptive column headings be added to Detailed Holdings (Appendix 2), and that the Commission sought information, as to the Council's approach to treasury management and investment. It was noted that investment opportunities were proactively sought, whilst still acting within the Council's investment limits. The Leader confirmed that changes to the column headings would be made to future reports.

## **RESOLVED**

That the Cabinet notes the report [FIN/674](#) and the treasury activity for the first two quarters of 2024/2025.

## **Reasons for the Recommendations**

The Chartered Institute of Public Finance and Accountancy (CIPFA) Code of Practice for Treasury Management (the TM Code) recommends that members be updated on treasury management activities regularly (Treasury Management Strategy, annual and mid-year reports). This report, therefore, ensures this Council is implementing best practice in accordance with the Code.

## 13. Forward Programme of Key Procurements (January – June 2025)

The Leader presented report [FIN/670](#) of the Head of Corporate Finance. The report sought approval for the current forward programme of key procurements (over £500,000) for January-June 2025 and delegated authority for contract award approvals following the appropriate procurement process. It also provided an update on the previously identified procurements from July – December 2024.

Councillor Irvine spoke as part of the discussion on the report.

### RESOLVED

That the Cabinet:

- a) endorses the procurement forward programme January – June 2025 (appendix A of report [FIN/670](#)).
- b) delegates authority to the Leader of the Council in consultation with the relevant Cabinet Member, relevant Head of Service, and Head of Governance, People & Performance to approve the award of the contract following an appropriate procurement process.
- c) delegates the negotiation, approval and completion of all relevant legal documentation, following the awarding of the contracts to the relevant Head of Service, Head of Governance, People & Performance, Head of Corporate Finance, in consultation with the appropriate Cabinet Member.  
*(Generic Delegations 2 & 3 will be used to enact this recommendation)*

### Reasons for the Recommendations

By approving the procurement forward programme there is greater transparency of future procurement processes allowing more scope for internal stakeholders to input into how future contracts are delivered.

The approval of the forward programme provides a key decision that will enable the individual procurement processes to be awarded under delegated authority once the tender process has concluded giving the Council the ability to reduce the time required to complete a procurement process.

## 14. Exempt Information – Exclusion of the Public (Subject to Agenda Item 5)

### RESOLVED

That in accordance with Section 100A(4) of the Local Government Act 1972, the public be excluded from the meeting for the following item of business on the grounds that it involve the likely disclosure of exempt information as defined in Part 1 of Schedule 12A of the Act by virtue of the paragraph specified against the item.

## 15. Waste and Recycling: Changes to Collection Regime and Extension of Waste and Recycling Contract

Exempt Paragraph 3 – *Information relating to the financial or business affairs of any particular person (including the authority holding that information)*

The Cabinet Member for Environment, Sustainability and Climate Change presented report HPS/045 of the Head of Major Projects and Commercial Services. The report sought approval to analyse options for the waste and recycling service and to introduce the Simpler Recycling Policy mandated by Government determining waste stream to be collected and frequency of collection.

Councillor Ayling presented the Overview and Scrutiny Commission's [comments](#) on the report to the Cabinet following consideration of the matter at its meeting on 25 November 2024, which included recognition that the National Waste Strategy 'Simpler Recycling' mandated waste collection authorities to introduce separate weekly food waste collections to all households by April 2026. It was noted that the statutory guidance confirmed that, as part of the transfer to a weekly food waste collection, local authorities should provide a minimum fortnightly collection of residual waste (i.e. no less frequently than every two weeks).

Councillors Irvine and Jones spoke as part of the discussion on the report and the Leader emphasised that the changes to the waste collections was only happening because the National Waste Strategy was requiring Council's to change their collection approaches.

### RESOLVED

That the Cabinet:

- a) approves the introduction of a separate weekly food waste collection service and to transfer the residual waste collection from a weekly to a fortnightly service from 2026 to meet the requirement of the National Resources and Waste Strategy and implement the changes to the collection regime on a phased basis with the initial roll out from April 2026.
- b) approves a contract extension with Biffa Municipal for a period of three years from April 2026 with the option to extend for a further two years thereafter.
- c) approves a virement for £890k for food waste vehicles and caddies funded from the DEFRA grant award of £848k and the earmarked reserve of £42k.
- d) requests that the Head of Corporate Finance include additional revenue funding of up to £150k in the 2025-26 Budget and Council Tax report to support the transitional and project management costs associated with implementing the food waste collection.
- e) notes that DEFRA has indicated new burdens funding will be allocated to support the additional revenue costs associated with food waste collection and to support



# Agenda Item 3

Cabinet (35)  
27 November 2024

the one-off transitional costs however the amount to be allocated and the basis upon which this will be calculated have yet to be confirmed.

- f) requests that the Head of Major Project and Commercial Services arranges for an All Members' Seminar prior to the introduction of the revised collection arrangements, to enable Councillors to understand the rationale, logistics and roll out programme for the proposed service changes.

## **Reasons for the Recommendations**

The recommendations will ensure compliance with the Environment Act (2021) requirement to introduce a separate weekly food waste collection while ensuring efficient use is made of available resource with the change to a fortnightly residual waste collection.

The recommendations will support the Council's net zero ambition with a projected 35% reduction in carbon emissions from the collection and disposal of household waste and recycling and a projected 10.4% increase in the Council's recycling rate.

## **Closure of Meeting**

With the business of the Cabinet concluded, the Chair declared the meeting closed at 8.55 pm.

**M G JONES**  
Chair

This page is intentionally left blank

# Agenda Item 7

## Crawley Borough Council

**Report to Overview and Scrutiny Commission  
13 January 2025**

**Report to Cabinet  
15 January 2025**

### **Housing Policies: (Compensation, Short-term Alternative Accommodation, Stock Condition, CCTV)**

Report of the Head of Crawley Homes, *CH/211*

---

#### **1. Purpose**

- 1.1 To request approval for the attached draft Crawley Homes policies to be adopted to comply Housing Regulation.
- Compensation (Appendix A)
  - Short-term alternative accommodation (Appendix B)
  - Stock Condition (Appendix C)
  - CCTV (Appendix D)

#### **2. Recommendations**

- 2.1. To the Overview and Scrutiny Commission:

That the Commission consider the attached policies and decide what comments, if any, it wishes to submit to the Cabinet.

- 2.2 To the Cabinet

That the Cabinet is recommended to:

- a) Approve the policies (Appendices A-D of report CH/211) for adoption and subsequent publication.
- b) Delegate authority to the Head of Crawley Homes, in consultation with the Cabinet Member for Housing, to make amendments to these policies as further changes to legislation and statutory guidance are introduced or following a subsequent review. (Generic Delegation 7 will be used to enact this recommendation).

#### **3. Reasons for the Recommendations**

- 3.1. To fulfil regulatory requirement to provide information to tenants about our service, processes and operations, ensuring transparency and accountability.
- 3.2. To ensure that Crawley Homes staff and representatives operate within the law and best practise during the course of their work.

# Agenda Item 7

## 4. Background

- 4.1. Crawley Homes has embarked upon a policy programme aimed at meeting the requirements of the Social Housing (Regulation) Act 2023 including expectations upon social housing providers from both the Regulator of Social Housing and the Housing Ombudsman.
- 4.2. These policies address issues pertinent to customers and that have been identified through analysis of complaints and resident engagement activities and against the Consumer Standards. They form part of Crawley Homes' service plan and will be subject to scrutiny during any regulatory inspection.

## 5. Description of Issue to be Resolved

- 5.1. Crawley Homes has few existing policies with staff reliance upon internal documents and procedures rather than public-facing documents with monitoring, ongoing update and evaluation and accountability to those affected.
- 5.2. Crawley Homes' service plan identifies the need for these policies to be written, approved and implemented.

## 6. Information & Analysis Supporting Recommendation

- 6.1. These policies commence a programme of policy development in key areas to meet the expectations upon us as a social landlord
- 6.2. Residents have been consulted widely on these policies, utilising mixed methods such as during engagement events, surveys and via our Tenant and Leaseholder Action Panel. These engagement activities have resulted in recommendations and suggested improvements to our service, which have been reflected in these policy drafts.
- 6.3. These policies are underpinned by an analysis of complaints and the actions set in response to these, with the aim of being fair, learning from outcomes and putting things right, in accordance with the Housing Ombudsman's dispute resolution principles.

## 7. Implications

- 7.1. There is a need to drive up standards in the sector, of which the implementation of these policies is part. Each policy may attract financial implications as follows:
  - Compensation – the Housing Ombudsman expects us to consider compensation as part of complaint handling and may even make its own orders for compensation if a complaint escalates that far. For example in 23/24 we received one order from the Housing Ombudsman requiring the Council to pay £1,425. There are existing compensation budgets within Crawley Homes, for 24/25 the total budget is £32,000.
  - Short term alternative accommodation – associated costs are already considered and paid but this policy formalises the approach and creates certainty for the resident. As a result we do not expect that costs will increase with any significance. There are also management controls in place to oversee, challenge and verify officer decisions for temporary moves to

# Agenda Item 7

help limit demand and ensure that temporary moves are only agreed in exceptional circumstances.

- Stock condition – the cost of stock condition surveyors are already accounted for in budgets following a growth item in 2023/24 in line with report CH/203. However, in the process of developing our understanding of stock condition, capital investment may be required over the longer term to meet requirements of the Consumer Standards and decent homes standards (a revision to the latter is expected).
- CCTV – no additional costs are anticipated as a direct result of this policy but over time we may make further investment in CCTV if there is a proven need for additional security measures at a particular scheme and/or designs for new build properties incorporate CCTV provision which as a result would bring more schemes within the remit of this policy.

- 7.2. Legal – Adoption of these policies will assist all staff to operate within the law. Specific legal advice will be sought as necessary.
- 7.3. Equalities - Equalities Impact Assessments have been carried out for each policy and impacts addressed (Appendix E)
- 7.4. Environmental - The policies consider environmental impacts and the Council’s net zero commitments.

## 8. Background Papers

None

Report author and contact officer:

Georgia Leigh  
Policy and Engagement Manager  
[Georgia.leigh@crawley.gov.uk](mailto:Georgia.leigh@crawley.gov.uk)

This page is intentionally left blank

APPENDIX A



## Crawley Homes Compensation Policy

<b>Policy Date</b>	
<b>TLAP approval</b>	<b>6.11.24</b>
<b>SMT approval</b>	<b>6.11.24</b>
<b>CMT approval</b>	<b>19.11.24</b>
<b>Cabinet Approval</b>	<b>3.1.25</b>
<b>Review Date</b>	

## Contents

<b>1.</b>	<b>Introduction</b>	<b>3</b>
<b>2.</b>	<b>Background and legal context</b>	<b>3</b>
<b>3.</b>	<b>Scope and definitions</b>	<b>4</b>
<b>4.</b>	<b>Policy statement</b>	<b>5</b>
<b>5.</b>	<b>Responsibilities</b>	<b>5</b>
<b>6.</b>	<b>Accessing compensation</b>	<b>7</b>
<b>7.</b>	<b>Financial compensation</b>	<b>8</b>
<b>8.</b>	<b>Other remedies</b>	<b>9</b>
<b>9.</b>	<b>Levels of financial compensation and authorities</b>	<b>10</b>
<b>10.</b>	<b>Complaints or disputes about this policy</b>	<b>12</b>
<b>11.</b>	<b>Equalities implications</b>	<b>12</b>
<b>12.</b>	<b>Environmental implications</b>	<b>12</b>
<b>14.</b>	<b>Staff training, monitoring and review</b>	<b>12</b>

## Appendices

<b>Appendix A: Right to Repair</b>	<b>14</b>
<b>Appendix B: Compensation claim form</b>	<b>15</b>
<b>Appendix C: Home loss and disturbance payments</b>	<b>19</b>



## 1. Introduction

- 1.1. We strive at all times to provide the best landlord service that we can. However, we acknowledge that there are times where our service may fall below expected standards with negative impacts on individuals or their households. Where this is the case, we are committed to putting things right.
- 1.2. The aim of this policy is to explain how we (Crawley Homes) will rectify any service failure in order to restore a person to the position they would have been in had the service failure not occurred. We ask that, if dissatisfied with our service or suffering any ill-effect resulting from our actions or perceived failings, that you raise this with us as soon as possible so that we can take action and assess compensation swiftly, ensuring better outcomes for all parties.
- 1.3. The policy explains the types of compensation and remedy we are able to offer and factors to consider in deciding upon appropriate compensation. This includes circumstances where financial compensation will be offered, as well as other remedies that should be offered where appropriate to the individual merits of the case.

## 2. Background and legal context

- 2.1. This policy sits within the context of far-reaching changes to the regulation of social housing included in the Social Housing (Regulation) Act 2023. The Act aims to increase accountability and raise standards within social housing.
- 2.2. This policy also draws from the Housing Ombudsman's Complaints Handling Code and Compensation policy and incorporates mandatory compensation measures included in statute.
- 2.3. At all times, we will work within the law and any relevant regulation, including but not limited to:
  - Social Housing (Regulation) Act 2023
  - Equality Act 2010
  - Housing Act 2004
  - Local Housing Authorities (Right to Repair) Regulations 1994
  - Housing Act 1985

## 3. Scope and definitions

- 3.1. This policy covers damage to individuals, their home or belongings or other impacts of service failure by Crawley Homes and those working on our behalf, such as contractors.
- 3.2. There are three categories of financial compensation that may be applied. These are:
  - **Mandatory** - these are set out by law and include payments for home loss or disturbance or payments under the Right to Repair Scheme for local authority tenants
  - **Quantifiable loss** – these are payments to remedy losses that the resident has suffered, for example paying for alternative accommodation or takeaway food, paying for cleaning resulting from work carried out by our operatives.
  - **Discretionary** – payments made for time and trouble/distress and inconvenience. These could include
    - poor complaint handling
    - delays in providing a service e.g. in undertaking a repair
    - failure to provide a service that has been charged for
    - temporary loss of amenity
    - failure to meet target response times
    - loss of use of part of the property
    - failure to follow policy and procedure
    - unreasonable time taken to resolve a situation
- 3.3. In addition to financial remedies, this policy also has scope to include other remedies to be made, either separately or in addition to an offer of monetary compensation. These can include practical actions (such as offering to undertake repairs or redecoration which would otherwise be a resident's responsibility) or other gesture such as vouchers, chocolates or flowers.
- 3.4. This policy is not intended to replace the need for home contents insurance. We strongly recommend that you take out a policy that is specifically designed for tenants and can offer details of a scheme we are partnered with. Leaseholders are required to take out insurance set out in the terms of the lease.
- 3.5. This policy does not cover damage where there has not been a service failure by Crawley Homes, for example, damage caused by fires, storms or floods that are outside of our control, or where we have fulfilled our repair responsibilities but damage from the initial incident should reasonably be claimed under home contents insurance.

## 4. Policy Statement

- 4.1. We want people to be able to raise service dissatisfaction with our service swiftly; in a format of their choosing; and to be confident that we will put things right.
- 4.2. We recognise that remedies may not always need to be monetary, but that in some instances, financial compensation may be the only and appropriate form of redress.
- 4.3. This policy must be applied in a proportionate and flexible way, taking into account the particular circumstances of the complaint but also our obligation to consider what represents good value for money for all of our residents. Compensation payments ultimately are drawn from the Housing Revenue Account, which is made up from rental income, and there must therefore be a reasonable and proportionate use of these funds.
- 4.4. We will learn from errors and review service failures to prevent others having a similar experience. Improvements will be reflected in our annual complaints action plan.

## 5. Responsibilities

- 5.1. All persons working for or on behalf of Crawley Borough Council are responsible for their own professional conduct and fostering a culture in which complaints are actively welcomed as a means of identifying and acting upon necessary service improvement.
- 5.2. **Head of Crawley Homes/Senior Management Team (SMT)**

The Head of Crawley Homes and SMT are responsible for:

- Overseeing the effectiveness and operation of this policy
- Instilling the culture and values of Crawley Borough Council, ensuring that these underpin the customer care ethos of Crawley Homes.
- Monitoring and identifying the root service issues that lead to dissatisfaction and the implementation of service improvements, practice or policy changes to address them.
- Executing their responsibilities under Crawley Borough Council's Complaints policy.
- Specifically, the Head of Crawley Homes has final oversight of all compensation awards resulting from stage two complaints. .

## 5.3. **Team Leaders/Service Managers**

- Ensuring that team members are familiar with how people can access compensation and what to advise them if they wish to make a claim for compensation.
- Handling stage one complaints and compensation requests that relate to the work of their team.
- Passing complaints and/or compensation requests to be handled and paid directly by the contractor where this is applicable. Crawley Borough Council may instead award the compensation and re-charge this to the contractor.
- Keeping clear records of decisions regarding compensation and how these decisions (whether financial or not, level of award) have been reached and providing a written record of this to the individual concerned.
- Sign off compensation up to the amount of £250.
- Seeking the approval from a member of SMT for amounts higher than £250.
- Where the incident or failure justifies it, Crawley Homes managers may also award compensation up to this amount outside of the formal complaints process. People affected must always be reminded that they can make a complaint instead, should they wish.

## 5.4. **All staff**

- All staff are expected to follow this policy in determining the appropriateness, value and type of compensation.
- Any person investigating an issue warranting compensation is responsible for overseeing the matter through to completion, including diarising and tracking follow-up action, keeping in communication with the person and checking their satisfaction with the handling of the issue.
- Crawley Homes staff may also award nominal compensation of up to £25 outside of the complaints process where it is clear that there has been a service failure. People must always be reminded that they can make a complaint instead, should they wish.

## 5.5. **Contractors and third parties**

- Contractors and third parties must abide by any specific contract clauses that set out where compensation is payable or recoverable from them for any failure to undertake any task or instruction or delay in doing so.
- Contractors must ensure awareness of, and comply with, Right to Repair legislation at all times. If they fail to carry out the repair within the prescribed periods, they will be liable for the compensation to the Residents.
- Contractors and third parties must fully co-operate with any enquiry or investigation made by the Housing Ombudsman.

- Contractors and third parties may have their own compensation guidelines but are expected as a minimum to follow this policy in determining the appropriateness, value and type of compensation.
- Persons investigating or awarding compensation on behalf of contractors or third parties will also be expected to oversee the matter to completion, including diarising and tracking follow-up action, keeping in communication with the person and checking their satisfaction with the handling of the issue.
- Contractors and third parties are responsible for ensuring that the terms of any sub-contract reflect these responsibilities
- Crawley Homes may deduct any compensation amount for which the contractor or third party is responsible from any payment due to the contractor or third party or recover this as debt.

## **6. Accessing compensation**

- 6.1. Any resident or person affected by Crawley Homes' landlord service may raise a compensation claim for financial loss, inconvenience or delay that is perceived to be as a consequence of actions by Crawley Homes or failures of service.
- 6.2. Compensation may be accessed in these ways:
  - i. During the course of a complaint. Within our complaints handling procedure, the complainant is invited to tell us their desired outcome. In many instances this will be an apology and action taken to resolve the problem, but this may also include financial compensation. We may also consider compensation as part of an outcome even if the complainant has not expressly requested this, based on our findings, level of service failure and impact.
  - ii. Completing a claim form in specific circumstances, such as home loss or disturbance, out of pocket expenses arising from temporary moves to accommodate repair works, or from emergencies. See Appendix B.
  - iii. Outside of the complaints process, at the discretion of any member of staff who is made aware of a service failure, up to the limits set out in the matrix below.
- 6.3. When making a compensation request, claimants must include full details of why compensation should be considered, including any evidence of impact such as photographs, letters or reports or any receipts for damaged items. It is vital that this evidence is retained until either the compensation request has concluded or they are no longer needed as evidence.

- 6.4. Any request for compensation and any remedy offered will be investigated and responded to in writing. If we decide not to award financial compensation despite a formal request for such, we will explain our decision making when replying formally to the complainant.

## 7. Financial Compensation

### Mandatory compensation

- 7.1. Mandatory compensation is compensation that must be paid in accordance with the law. This includes compensation for home loss, disturbance and compensation under 'Right to Repair' as detailed below:

- i. **Home Loss**

- 7.2. A home loss payment compensates people for the distress and inconvenience where the Council has to permanently move them from their home at a time not of their choosing because it is being demolished or redeveloped. Mandatory home loss payments only apply to permanent moves. Losses arising from moving on a temporary basis, for example to allow repair works are discretionary payments (see below) and covered within our Short-term Alternative Accommodation policy.

- 7.3. If you are in arrears, we may use the home loss payment towards clearing these arrears, with anything remaining being paid to you. This would be determined on a case-by-case basis in light of the circumstances.

- ii. **Disturbance**

- 7.4. Mandatory disturbance payments cover reasonable expenses incurred if a person is permanently displaced from their property. Please see Appendix C for further details. For up to date, current legal advice see [www.shelter.org.uk](http://www.shelter.org.uk).

- 7.5. For losses as a result of moving into temporary alternative accommodation, see our policy on Short-term Alternative Accommodation.

- iii. **Right to Repair**

- 7.6. Certain types of repairs qualify for the Right to Repair scheme. These are known as 'qualifying repairs.' These include insecure windows and doors, unsafe power sockets or electrical fittings, leaking roofs and broken entry phone systems. A full list of the qualifying repairs and the financial payments are set out in Appendix A. This scheme only applies to the qualifying repairs that Crawley Homes is responsible for and for repairs that do not exceed an estimated cost of £250.

- 7.7. We may inspect the repair to decide if it 'qualifies' and we will write to you if it does not.
- 7.8. The maximum available payment for repairs under the right to repair scheme is £50.00.

## **Discretionary Compensation**

### **i. Quantifiable loss**

- 7.9. This form of financial compensation is not mandatory. It repays people for any financial costs they have suffered as a result of a service failure by Crawley Homes.
- 7.10. Consideration will be made of how necessary, reasonable and justifiable requests are for quantifiable losses. These requests will not be honoured if they are considered to be excessive, and we do ask that some evidence is provided, such as receipts, bank statements or bills that demonstrate the actual loss to the person.
- 7.11. We will usually refer residents to their insurance company in the first instance to claim personal losses under home contents insurance, and if we are liable we would compensate for excess payments or increased premiums.

### **ii. Non-quantifiable loss**

- 7.12. These are payments that take into account losses that are not quantifiable, such as for distress or inconvenience. To decide upon an appropriate discretionary compensation offer, we will take into account a number of factors such as:
- The length of time or level of disruption
  - Any impact that is worsened due to disability, age or the presence of young children or any other factors.
  - Unquantifiable financial loss that would have not occurred if the service failure hadn't happened.
  - Distress and inconvenience to the person
  - Actions of the person, household or visitor, which may have contributed to any loss
  - The levels of compensation awarded for similar cases by the Housing Ombudsman.

## **8. Other Remedies**

- 8.1. Any investigation of a complaint must take into account the outcome or remedy that the resident would like. Our complaints handling process allows for full

discussion of desired outcomes and our investigation explores each issue of concern raised and our response or action in full.

8.2. Depending on the situation, compensation may not always be financial, or could include both financial and non-financial remedies. Other remedies may prove to be powerful by affirming and acknowledging the impact upon the person, and preventing this experience being repeated. Non-financial remedies may include:

- An apology
- Acknowledgement that things have gone wrong through no fault of the individual or household
- Providing an explanation, assistance or reasons
- Taking action if there has been delay, for example to bring forward the expected action
- Reconsidering or changing a decision
- Amending a record or adding a correction or addendum
- Changing policies, procedures or practices

## **9. Levels of financial compensation and authorities**

9.1. The matrix below will be applied to help determine what gesture or compensation is appropriate and who may authorise it.

9.2. These are guides and maximum limits for consideration, rather than fixed amounts (except where stated) and will be based upon the facts of the case and liaison with the person(s) affected.

9.3. The definition of what would be considered a low, moderate or severe impact can vary between individuals and should bear in mind the customer's own description and evidence of loss and their desired outcome, as well as advice of colleagues and reference to similar cases.

9.4. Specific calculations may also apply in certain circumstances such as loss of a room or amenity. Thresholds for amounts that can be authorised remain the same, and therefore payments over a certain amount must always be checked with the person who has the authority to authorise.



Level of CBC responsibility for service failure	Likely impact on the individual or household and who may authorise			
	None/minor	Low	Moderate	Severe
<b>None/unclear</b>	Support and assistance  All staff	Support and assistance, up to £25 or a non-financial gesture.  All staff	Support and assistance, up to £25 or a non-financial gesture.  All staff	Support and assistance, up to £25 or a non-financial gesture.
<b>Partial</b>	Financial or non-financial  Service Manager/complaint handler to review  Up to £25 per service failure <b>or</b> discretionary payment.  Up to a maximum of £75	Financial or non-financial  Service Manager/complaint handler to review  Up to £25 per service failure, or discretionary payment.  Up to a maximum of £75	Financial or non-financial  Service Manager to review  Up to £25 per service failure <b>or</b> discretionary payment  Up to a maximum of £100	Financial or non-financial  Service Manager to review  Up to £25 per service failure <b>or</b> discretionary payment -  Up to a maximum of £250
<b>Full</b>	Financial or non-financial  Service Manager/complaint handler to review  Up to £25 per service failure <b>or</b> discretionary payment  Up to a maximum of £75	Financial or non-financial  Service Manager to review  Up to £25 per service failure <b>or</b> discretionary payment  Up to maximum of £100	Financial or non-financial  SMT member to review  Up to £25 per service failure <b>or</b> discretionary payment  Up to maximum of £250	Financial or non-financial  SMT to review with CBC senior colleague if stage one complaint. Or Head of Service  Up to £25 per service failure <b>or</b> discretionary payment based upon case

## **10. Complaints or disputes about this policy**

- 10.1. If you feel that this policy has been applied incorrectly you can escalate this through the council's complaints policy [Complaints | Crawley GOV.](#)

## **11. Equalities Implications**

- 11.1. An equalities impact assessment has been completed.

## **12. Environmental Implications**

- 12.1. Any remedial action will need to bear in mind considerations around waste, resources and the Council's commitment to net zero.

## **13. Consultation**

- 13.1. All policies are subject to resident consultation. As a minimum this includes each policy being placed before our Tenant and Leaseholder Action Panel (TLAP) for scrutiny, and drawing upon feedback gained through resident engagement activities. Wider consultation will also take place depending upon the nature, complexity or impact of a policy.
- 13.2. Details of consultation can be found in the Equality Impact Assessment relating to the policy and in consultation summary documents where consultation has been more wide-ranging.
- 13.3. All policies must also have agreement of SMT and Cabinet.

## **14. Staff Training, Monitoring and Review**

- 14.1. We want to know about dissatisfaction with our services whether through contact with our officers; making a complaint or offering thoughts or suggestions through our resident consultation channels. We will use this information to assess our performance and identify common themes or concerns with aspects of our service. We will apply this learning to future reviews of this policy.
- 14.2. By delivering a consistent standard, acting on feedback, understanding residents' needs and preferences and inviting tenant scrutiny of our service we

aim to reduce the likelihood of service failings where compensation becomes necessary.

14.3. All staff of Crawley Homes are expected to undertake as a minimum the following training, which will support the application of this policy:

- Housing Ombudsman's Dispute Resolution Training 1 and 2
- Crawley Borough Council's suite of customer care training – parts 1, 2 and 3
- Equality, Diversity and Inclusion training
- A suite of training around potential issues affecting residents and their wellbeing, including mental health awareness and neurodiversity.

## Appendix A: Right to Repair

Under the Right to Repair Scheme, tenants have the right to have small, urgent repairs carried out within a specific timescale. These repairs and expected timescales are listed below. The repair must have an expected value of less than £250 for this scheme to apply.

### What happens if the work isn't done in time?

If the repair work isn't done within the specified time limit, you may ask for another contractor, approved by the landlord to do the work instead. We will issue the repair to the alternative contractor and send you a copy. We can only use contractors on our list.

### What happens if I am not in when the contractor calls?

If you're not at home to let the contractor in as arranged, the scheme no longer applies.

### What is a 'qualifying repair?'

#### Qualifying repairs under the Right to Repair scheme for local authority tenants:

Repair type	Response time(working days)
Total loss of electric power	1
Partial loss of electric power	3
Unsafe power or lighting socket or electrical fitting	1
Total loss of water supply	1
Partial loss of water supply	3
Total or partial loss of gas supply	1
Blocked flue to open fire or boiler	1
Heating or hot water not working between 31 October and 1 May	1
Heating or hot water not working between 1 May and 31 October	3
Blocked/leaking foul drain, soil stack or toilet	1
Toilet not flushing (if there is only one toilet in the property)	1
Blocked sink, bath or basin	3
Tap cannot be turned	3
Leak from a water pipe, tank or cistern	1
Leaking roof	7
Insecure external window, door or lock	1
Loose or detached banister or handrail	3
Rotten timber flooring or stair tread	3
Door entry phone not working	7
Mechanical extractor fan not working	7

### Claiming compensation under Right to Repair

If the second contractor doesn't do the repair work within the time limit, you are entitled to receive £10 in compensation. For every extra day you wait, you will receive another £2. The most compensation you can receive under the right to repair scheme is £50.

**This is not a definitive guide to the law. You are advised to contact an independent, free advice service such as CAB for further information.**

## Appendix B: Compensation Claim Form

This compensation claim form should be used to make a claim for damage to individuals, their home or belongings or other impacts of service failure by Crawley Homes, Contractors and those working on our behalf.

It may also be used to claim for reasonable expenses you have incurred if you have been required to leave your home for necessary works to take place.

Please note that you must notify us of your potential claim as soon as you have incurred the expenses or become aware of damage or loss. We may not accept responsibility for any alleged losses if you do not notify us in good time.

### Claims for loss or damage:

- **You must ensure that you keep any damaged items you are claiming for as evidence** of your claim until your claim has been settled.
- **You will need to support your claim with as much evidence as possible**, such as time stamped photographs of any damage, bills, receipts or evidence of the cost of any items to be replaced.
- We will only consider compensation payments where loss or damage is as a result of us failing to deliver a service
- Tenants and leaseholders are expected to take out contents insurance and to pursue claims through your own insurers for damage where we are not directly responsible, and have fulfilled our obligations as a landlord.

### Claims for expenses:

- If you are claiming for direct expenses you have incurred, such as for food, fuel or travel, you **must** provide a receipt or bill for each transaction.

**Crawley Homes has partnered with a very competitive home contents insurance provider, designed especially for tenants. For information, please contact your Housing Officer.**

## Claim for Compensation

**Please note that the issue of this form does not constitute acceptance of liability.**

Please complete **ALL** questions as accurately as possible.

Full name of claimant:	Address:
Daytime Telephone Number:	Date of Birth:

Are you a Council tenant? Yes  No

Leaseholder: Yes  No

Do you have any contents insurance? Yes  No

If Yes, please provide the name and address of the insurance company and the policy number:

Do you have any ongoing or previous claims against the Council? Yes  No

If Yes, please provide details:

## Details of this claim

Item	Date of Purchase	Purchase price or amount claimed for damaged item	
		£	P

Please send copies of receipts, photographs or evidence with your claim.

**You should keep any damaged items you are claiming for until your claim is settled.**

Details of damage or expense incurred and why you believe Crawley Borough Council or our contractor/third party to be responsible:

### Declaration

I/We declare that the details above are true and complete.

Signed:

Date:



## **Appendix C: Home Loss and Disturbance Payments**

### **Home Loss Payments**

To qualify for a mandatory home loss payment, you must:

- have been living at the property for at least 12 months before the date we move you. If you have not lived at the property for 12 months you may still be entitled to a pro-rata disturbance payment.
- be moving away from your existing home permanently.

Only one home loss payment will be made per property, whether it is an individual or joint tenancy. We will usually only make a home loss payment by direct bank transfer and only to the person(s) named on the tenancy agreement. We will only pay this after the move has taken place, and within three months of receipt of claims, whichever is latest.

This mandatory payment is fixed by Section 30 of the Land Compensation Act 1973 and is reviewed annually.

### **Disturbance Payments**

Typical items which can be claimed for disturbance include, but are not limited to those set out below. Whether you are able to claim will depend upon your circumstances and any proof of losses.

The burden of proof for any losses claimed is with the person claiming. This means that the onus is on you to be able to justify any claim.

It is of vital importance that you keep a detailed record of any losses of costs associated with moving from your home. You should keep all relevant evidence such as receipts, invoices or quotes.

Items which could be claimed for include:

- special adaptations to your replacement property
- altering soft furnishings and moveable fittings and fixtures to fit your new home
- disconnection and reconnection of services such as telephone or utilities
- forwarding of post (for a reasonable period)

This page is intentionally left blank

**APPENDIX B**



**Short-term Alternative Accommodation**

<b>Policy Date</b>	
<b>TLAP approval date</b>	<b>6.11.24</b>
<b>SMT approval date</b>	
<b>Cabinet approval</b>	
<b>Review Date</b>	

## Contents

1.	Introduction	3
2.	Background and legal context	3
3.	Policy statement	3
4.	Responsibilities	4
5.	Circumstances leading to short-term alternative accommodation	5
6.	Alternative accommodation options	6
7.	When a more permanent move may be considered	7
8.	Tenure	7
9.	Preparation and practical support	7
10.	Return to the resident's home	8
11.	Expenses and moving services	8
12.	Payment of rent during a temporary move	9
13.	Housing costs	9
14.	Record keeping	9
15.	Complaints or disputes about the policy	9
16.	Equalities implications	9
17.	Environmental implications	10
18.	Consultation	10
19.	Staff training, monitoring and review	10

Appendix A: Short Term Alternative Accommodation Plan

## 1. Introduction

- 1.1. This policy sets out Crawley Homes' approach to accommodating residents on a temporary basis if their home becomes unoccupiable for a short period of time. This might be because it has become unsafe, is subject to repairs or planned works needing the property to be vacant, or due to an emergency.
- 1.2. The policy does not cover unusual circumstances such as where a property is to be demolished, or large-scale redevelopment or regeneration of an area, to which different arrangements and mandatory compensation awards apply. It does, however, include limited circumstances where a permanent move may be considered.
- 1.3. The policy sets out what residents can expect, under what circumstances and how we will ensure that this transition is as smooth as possible, without causing them undue disruption and difficulty.

## 2. Background and legal context

- 2.1. This policy sits within the context of far-reaching changes to the regulation of social housing included in the Social Housing (Regulation) Act 2023. The Act aims to increase accountability and raise standards within social housing.
- 2.2. At all times, we will work within the law and any relevant regulation, which also includes but is not limited to the:
  - Building Safety Act 2022
  - Housing Act 2004
  - The Decent Homes Standard:
  - Housing Health and Safety Rating System (HHSRS)
  - Equality Act 2010

## 3. Policy statement

- 3.1. We consider that any move away from a person's home, for works to take place, should only be considered as a last resort and in exceptional circumstances. Wherever possible our teams and contractors should endeavour to work around the resident in their home, taking steps to minimise disruption and ensure that their needs are met.

- 3.2. Wherever possible we encourage residents to consider staying with family or friends, but we will always consider their own wishes and circumstances.
- 3.3. If short-term accommodation is sought, it may not be of the same size and specification as the resident's existing home, due to the need to act quickly and reliance upon what property is available at the time. However, we will ensure that we meet the requirements of the Equality Act and all statutory minimum household requirements.
- 3.4. Decants are emotive and need to be handled sensitively and thoroughly to ensure the resident can return to their home in a timely manner. We will ensure that works are completed as quickly as possible, and that costs and disruptions are minimised (without impacting on quality) whilst ensuring clear channels of communication.
- 3.5. Our objective is to offer alternative accommodation on a temporary basis and residents would be expected to return home on completion of the works.

## 4. Responsibilities

- 4.1. **All staff** are responsible for raising any health and safety concerns or hazards within a resident's home.
- 4.2. **The Operations and Maintenance Manager or Asset Manager** is responsible for notifying the Tenancy Services Team that alternative accommodation is to be sought and for coordinating the work with all parties so that the temporary move is as short as possible.
- 4.3. **The Tenancy Services Team** will support residents with practical, financial and other arrangements and provide a named point of contact for the duration of the move. Specifically they will be responsible for:
  - Identifying the needs, preferences and circumstances of the resident and their family and coordinating a plan that best meets these needs
  - Issuing a license agreement/ non-secure tenancy (as applicable) for the ongoing accommodation
  - Supporting with the move or continuation of claims for Housing Benefit/Universal Credit payments
  - Clearly informing the resident of their responsibilities, for example to continue to pay any rents and charges agreed.

#### 4.4. **The resident is responsible for:**

- Meeting the conditions under which the accommodation is let. This would normally be a non-secure tenancy, but for shorter-term moves, a license agreement, or any booking conditions of external short-term rental accommodation.
- Continuing to pay rent on either their main home or short-term accommodation
- Paying utility payments such as gas, electricity, internet, and phone bills (charges made when the resident is not living at their original accommodation may be claimed back.)
- Following any processes agreed around, for example, access to their main home, safekeeping or storage of possessions
- Support will be provided with these responsibilities if this is identified as a need during planning of the move.

#### **5. Circumstances leading to short-term alternative accommodation**

##### **Emergencies such as fires or floods that make the home uninhabitable.**

- 5.1. In the event of an unplanned incident such as a fire or a flood, where the long-term outcome is not known, we will work closely with housing allocations to address immediate and ongoing housing need.

##### **Poor or uninhabitable condition**

- 5.2. If an inspection or visit reveals a home is in poor condition or uninhabitable, we will assess the level of hazard under the Housing Health and Safety Rating System (HHSRS) against the potential impact on the resident(s.) Examples might include where any HHSRS hazard present could have a significant effect on a member of the household due to them having a health condition (such as a respiratory condition that presents heightened risk from damp and mould.)

##### **Planned works requiring an empty property**

- 5.3. Occasionally it may be necessary to carry out extensive repair works to a property that require it to be vacant and cannot wait for the current resident to move permanently. Short-term accommodation may also be considered necessary where medical information suggests that an impact upon an existing health condition or cause disruption that the resident would not be able to manage.

## 6. Alternative accommodation options

6.1. The accommodation provided will depend on several factors such as the expected length of works and the housing needs of the resident. If the resident has insurance, and damage prevents them being able to stay in the home, short term accommodation costs may be covered by their policy. If this is not appropriate the housing officer will consider the needs of the household with the resident and look at options such as:

- Stay with family and friends
- Stay in hostel/hotel or holiday 'service-let' provided by the Council
- Stay in alternative Council accommodation on an insecure basis from any empty stock
- Stay in the sheltered guest room if the move is short-term and the resident is eligible (over 55.)

## 7. When a more permanent move may be considered

7.1. Our intention is to move people only temporarily from their home due to the upheaval and potential emotional impact of moving permanently. However, in rare circumstances, and in full consultation with the resident(s) concerned, it might be more appropriate to work with Housing Allocations Team to enable a permanent move property. These are when:

- A significant amount of work is needed on a property that is considered unsuitable for the resident's needs (e.g. overcrowding or under occupying)
- Where the resident or a member of the household would be negatively impacted by the insecurity or experience of moving temporarily to another property, for example as a result of age, disability or for health reasons.
- The proposed works are likely to take more than 6 months to be completed.
- The resident requests that their temporary property becomes a permanent transfer. A transfer in these circumstances is covered by the Council's Allocations Policy and not decided by Crawley Homes. Alternatively, a permanent offer can be granted at the discretion of the Head of Crawley Homes as a management transfer. We cannot guarantee that this will be possible but will consider these requests, particularly if the ongoing accommodation is more suitable. We will not consider this if the need for the move is caused by intentional damage to the original property.



- 7.2. In these circumstances, mandatory home loss and disturbance payments may not apply, and further advice will need to be taken. However, disturbance payments may be made on a discretionary basis.

## **8. Tenure**

- 8.1. Residents who move from their home temporarily will be offered a licence or non-secure tenancy dependent on the circumstances. If the move is intended to be very short term, we will usually offer a licence, but if intended to last over a longer period (one-six months) we will usually offer a non-secure tenancy.

## **9. Preparation and practical support**

- 9.1. We will ensure that residents are consulted about the proposed temporary move, with clear information about why this is necessary, how long this is likely to be for, and when they can return to their home.
- 9.2. In each instance, the resident will be given a single point of contact in the event of concerns and to receive regular updates.
- 9.3. The Housing Officer or other named contact will work with the resident to create a plan and assessment of the needs of the household, including where any protected characteristics and reasonable adjustments need to be considered. This will highlight individual circumstances such as reasonable distances from work, family, or schools wherever possible, and steps to minimise disruption.
- 9.4. The plan will also cover access arrangements whilst the resident cannot occupy their home. Once the move to the new accommodation has taken place, residents must not be expected to provide access for contractors, tradespeople and out of hours and must be able to expect to live peacefully away from the disruption. Equally, for any work to take place quickly and efficiently, contractors and tradespeople will require clear, uninterrupted access, so any arrangements for collecting items, including post, or visiting the property must be clearly set out and agreed by all parties involved.
- 9.5. This plan will include contact preferences for updates and set out a regular check in to share any concerns, progress and timescales should these change.
- 9.6. Responsibility for any furnishings and possessions left in the main home will be set out in the plan.

- 9.7. The plan will be made and reviewed whatever onward accommodation is chosen to ensure that it remains suitable; for example to reassess suitability over time if a resident has gone to stay with family or friends, or if circumstances such as school places have changed.

## **10. Return to the resident's home**

- 10.1. Before a resident returns to their home, a thorough inspection and health and safety check will be completed. Any outstanding minor touches will be communicated with the resident with timescales for completion.

## **11. Expenses and moving services**

- 11.1. Residents who are temporarily moved will be entitled to reimbursement for reasonable expenses associated with the move. This may include:

- Meal vouchers / meals if decanted into a property without cooking facilities such as a hotel
- Additional travel costs as a result of moving location
- Subsistence payments if staying with family/friends
- Reconnection costs associated with internet/satellite
- Washing facilities or laundry arrangements if no facilities are available
- Mail redirection services
- Provision of window coverings such as curtains or blinds and poles/rails if not provided

- 11.2. The items/services for which the Council will agree to pay will be assessed on a case-by-case basis by the Housing Officer and Area Housing Manager based on the type of accommodation the resident will be moving to and the reason for the move, for example, what would be considered reasonable if the damage or concern prompting the move has been caused by the resident.

- 11.3. As far as possible, these expenses will be agreed ahead when the support plan is made. If items or provisions can be directly purchased by Crawley Homes or an allowance paid upfront, we will make efforts to do so to avoid hardship to the resident.

- 11.4. Receipts, invoices or other proof must be provided for any items to be reimbursed. The resident should also not incur any costs without first

agreeing the amount with the Council. If the resident does not do this, they risk the refusal to pay for the item and/or the full amount incurred.

- 11.5. If the resident chooses to make their own arrangements rather than accept assistance from the Council, the Council will reimburse them only up to the value the Council would have agreed to pay had the resident accepted assistance.

## **12. Payment of rent during a short-term move**

- 12.1. If an alternative property is offered on a temporary (insecure) basis to allow the works to be completed, the resident will be expected to continue paying rent on the lower of the two properties and charges on the other property will be suspended. This will ensure that they are not financially disadvantaged by any temporary move.
- 12.2. The Housing Officer will liaise with the relevant internal departments regarding Council Tax arrangements and change of address details.

## **13. Housing costs**

- 13.1. Residents are not able to claim Universal Credit housing costs or Housing Benefit on more than one home. The resident will only pay rent on one property, and this will be on the Crawley Homes property where they are a tenant.

## **14. Record keeping**

- 14.1. Clear records must be made of all contacts, calls or meetings with the resident concerning their move and any queries during the period.
- 14.2. This information will be recorded as a CRM contact in the Council's housing management system.

## **15. Complaints or disputes about the policy**

- 15.1. If you feel that this policy has been applied incorrectly you can escalate this through the council's complaints policy [Complaints | Crawley GOV](#).

## **16. Equalities implications**

- 16.1. An equalities impact assessment has been completed to ensure that no group is negatively impacted due to possessing any protected characteristic. It is envisaged that the robust planning and contact arrangements set out in

this policy will pay due regard to equalities by ensuring that any needs arising from a protected characteristic can be effectively identified and acted upon.

## **17. Environmental implications**

- 17.1. Environmental implications include the need to reduce the consumption of energy, fuel and single-use items as a result of implementing this policy. For example, we will need to ensure that the short-term move does not require the purchase of items that cannot be reused, excess vehicle transport due to location of the new accommodation or replacement e.g. of carpets, furniture or soft furnishings unnecessarily.
- 17.2. This policy does make possible work which otherwise would not be possible with the resident in situ – for example major refurbishment works to create better insulated, warm and energy efficient homes.

## **18. Consultation**

- 18.1. All policies are subject to resident consultation. As a minimum this includes each policy being placed before our Tenant and Leaseholder Action Panel (TLAP) for scrutiny, and drawing upon feedback gained through resident engagement activities. Wider consultation will also take place depending upon the nature, complexity or impact of a policy.
- 18.2. Details of consultation can be found in the Equality Impact Assessment relating to the policy and in consultation summary documents where consultation has been more wide-ranging.
- 18.3. All policies must also have agreement of SMT and Cabinet.

## **19. Staff training, monitoring and review**

- 19.1. All staff of Crawley Homes are expected to undertake as a minimum the following training, which will support the application of this policy:
  - Housing Ombudsman’s Dispute Resolution Training 1 and 2
  - Crawley Borough Council’s suite of customer care training – parts 1, 2 and 3
  - Equality, Diversity and Inclusion training
  - A suite of training around potential issues affecting residents and their wellbeing, including mental health awareness and neurodiversity.

## Appendix A: Short Term Alternative Accommodation Plan

### Short Term Alternative Accommodation Plan

#### PART A: IDENTIFYING NEEDS

This plan aims to address the needs of the household, including any reasonable adjustments needed to minimise loss and disruption arising from short-term relocation from the home.

<b>1. Name of tenant/joint tenants:</b>
<b>Current address:</b>
<b>Contact phone number(s)</b>
<b>Email address(es)</b>
<b>Staff note: please ensure that these details are accurate on Active H</b>

<b>2. Household members and ages: Continue onto a separate sheet if necessary.</b>	
<b>Name</b>	<b>Age</b>

--	--

<b>3. Do any members of the household have specific requirements relating to a health condition, disability, religious requirement or to protect their safety and wellbeing? Please provide details: Continue onto a separate sheet if necessary. Please provide any evidence as requested.</b>	
<b>Name</b>	<b>Requirement</b>

<b>4. Does any member of the household travel regularly to school, work, family commitments, voluntary work, place of worship any other regular commitment?</b>	
<b>Name</b>	<b>Requirement</b>

<b>5. Do you have any other circumstances, issues or concerns you would like to us to consider?</b>

<b>Signed Tenant</b>	<b>Signed Crawley Homes</b>
<b>Date:</b>	<b>Date:</b>

**PART B: DETAILS OF ACCOMMODATION AND ASSISTANCE**

<b>1. Name of tenant/joint tenants:</b>
<b>Temporary address:</b>
<b>Contact phone number(s) for duration of move (if changed)</b>
<b>Email address(es) for duration of move (if changed)</b>
<b>Staff note: please ensure that these details are accurate on all housing management and financial systems.</b>

<p><b>How will needs identified in Part A be met?</b>                  Have the needs identified in part A been met through the ongoing accommodation? If not, what mitigation is possible, for example if there are no cooking facilities what can be offered instead?</p>		
<p><b>Identified Need</b> List all applicable</p>	<p><b>Crawley Homes will:</b></p>	<p><b>The resident will:</b></p>

<p><b>Expenses and limits agreed:</b>                  Do not include expenses that are already covered by existing arrangements e.g. bus travel that is already covered by an existing bus pass. Calculate only the excess cost over and above the cost of the resident had stayed in their own home.</p>		
<p><b>Expense</b></p>	<p><b>How has expense been arrived at</b></p>	<p><b>How applied? E.g. daily, per mile, per week</b></p>



**Is any assistance needed to move essential items?** (Please bear in mind that this is a short-term move of limited duration and we can only support reasonable costs. This would not normally include any furniture unless specifically adapted)

**Food provision/cooking facilities**

**Safekeeping of personal effects, furniture and belongings**

Arrangements for the safe relocation or covering of furniture and personal belongings. The resident is responsible for relocating items that may be damaged or removing personal or valuable items where it is possible to do so.

Please set out any expected actions for the contractor or assistance that is needed by the household.

Please include any photographs of the condition of significant items/decoration.

**Accessing your home**

You are not expected to provide access for contractors, tradespeople or out of hours. If any request is made, please direct this to your housing officer or the duty housing officer.

Tradespeople will require clear, uninterrupted access to your home and to protect site safety. You will not be able to visit without prior arrangement so please make sure that you take all essentials with you.

<b>If a regular visit is required, what will the arrangements be?</b>	
<b>If I need to arrange a one-off visit, I will contact:</b>	
<b>Name</b>	<b>Contact details</b>
How much notice do they require?	
<b>Arrangements for collecting or redirecting post:</b>	

<b>Meter readings at point of departure * as applicable</b>
<p><b>Electric</b></p> <p><b>Gas</b></p> <p><b>Water</b></p>

<b>Signed Tenant</b>	<b>Signed Crawley Homes</b>
<b>Date:</b>	<b>Date:</b>

**PART C: CONTACT ARRANGEMENTS**

<p><b>Staying in touch</b>          Agree who will update you, how, when and how regularly during the course of the work</p>

<b>Details of contact/updates to resident</b>	
Date	Contact by whom and notes

This page is intentionally left blank



## Crawley Homes Stock Condition Policy

<b>Policy Date</b>	
<b>TLAP approval</b>	
<b>SMT approval</b>	<b>6.11.24</b>
<b>CMT approval</b>	<b>19.11.24</b>
<b>Cabinet Approval</b>	<b>3.1.25</b>
<b>Review Date</b>	

## Contents

1. Introduction .....	3
2. Legal Context .....	4
3. Definitions .....	5
4. Policy statement .....	6
5. Survey content .....	7
6. Partnership working.....	8
7. Complaints or disputes about the policy .....	8
8. Equalities implications .....	8
9. Environmental implications .....	8
10. Staff training, monitoring and review .....	9
11. Consultation .....	9

## 1. Introduction

- 1.1. This stock condition policy sets out how we will assess the condition of our housing stock to ensure the wellbeing and safety of residents and maximise the efficiency of our maintenance investment programmes.
- 1.2. At Crawley Homes we recognise that our housing assets are integral to providing happy customers and healthy homes. It is vital that we proactively monitor and manage the condition of our homes to uphold our commitment to quality housing provision.
- 1.3. Reference within this policy to residents includes both council tenants and leaseholders.
- 1.4. A list of key definitions and acronyms is set out in Appendix A.

## 2. Background and Legal Context

### Legal Framework:

- 2.1. Our Stock Condition Survey programme operates within local, regional, and national legislation governing housing standards; landlord obligations; and tenant rights. This includes but is not limited to:
  - Building Safety Act 2022
  - Housing Act 2004: Establishing minimum standards for residential properties, including safety, amenities, and maintenance requirements.
  - Landlord and Tenant Act 1985: Outlining the rights and responsibilities of landlords and tenants, including the provision of safe and habitable living conditions.
  - The Decent Homes Standard: Sets a minimum standard for all social housing. Ensuring a property is in a reasonable state of repair, having reasonably modern services, providing a reasonable degree of thermal comfort. The standard defines a decent home as being free from most serious health and safety hazards, such as fall risks, fire risks, or carbon monoxide poisoning.
  - Health and Safety Regulations: Ensuring compliance with health and safety standards to safeguard residents against hazards and risks including The Housing Health and Safety Rating System (HHSRS).
  - HHSRS: Risk assessment procedure that is the statutory element of the Decent Homes Standard.
  - Data Protection Laws: Safeguarding the privacy and confidentiality of tenant information collected during the stock condition survey, in accordance with data protection regulations. To be read in conjunction with Crawley Borough Council's associated policies and procedures.

### Regulatory Compliance:

- 2.2. Our Stock Condition Survey policy aligns with regulatory requirements.

- Social Housing (Regulation) Act 2023: Adhering to specific regulations and guidelines regarding property standards and tenant welfare.
- Housing Ombudsman Service: Committing to fair and transparent dispute resolution mechanisms in accordance with the principles outlined by the Housing Ombudsman Service.

## **Tenant Rights and Engagement:**

- 2.3. Central to our policy is the protection of tenant rights. We uphold the principles of:
- **Right to Information:** Ensuring tenants are informed about the purpose, process, and outcomes of stock condition surveys, promoting transparency and accountability.
  - **Right to Participation:** Providing avenues for tenant involvement in survey planning, implementation, and review processes, fostering a collaborative approach to property management.
  - **Right to Redress:** Offering accessible channels for tenants to raise concerns, lodge complaints, and seek resolution for issues identified during surveys, in line with regulatory requirements and best practices.

## **Ethical Considerations:**

- 2.4. Beyond legal obligations, our policy is guided by ethical principles of integrity, fairness, and respect for human dignity. We pledge to:
- Uphold the highest standards of ethical conduct in all aspects of property management, including survey administration, data handling, and tenant interactions.
  - Prioritise the well-being and best interests of tenants, recognising their inherent right to dignified and safe housing conditions.

## **3. Policy statement**

- 3.1. We will carry out Stock Condition Surveys, collecting asset data and resident information over a rolling three-year programme.
- This programme will help prevent minor issues from escalating into major problems, ultimately saving costs and resources overall. The data collected will be used to run a preventive maintenance model to upgrade component items before they fail.
- 3.2. We are committed to:
- **Comprehensive Assessment:** Conducting thorough and programmed surveys within this cycle.
  - **Data-Driven Decision Making:** Using survey findings to inform strategic decision-making, including prioritising maintenance activities, budget-allocation, and long-term asset management plans.



- **Tenant Engagement:** Engaging with tenants throughout the survey process to ensure their voices are heard, and their concerns are addressed.
  - **Compliance and Regulatory Adherence:** Ensuring full compliance with relevant legislative and regulatory requirements, maintaining the highest standards of safety, accessibility, and sustainability.
  - **Continuous Improvement:** Continuously reviewing and refining our survey methodologies and procedures to enhance effectiveness, efficiency, and accuracy over time.
- 3.3. By implementing this policy, we demonstrate our commitment to providing happy customers and healthy homes, prioritising the well-being and satisfaction of our residents above all else.

## 4. Priority groups and areas

- 4.1. To ensure that preventative maintenance measures are implemented where they may be needed most, our stock condition survey programme will prioritise several target groups and areas:
- Households that include people with health, disability or other specific requirements
  - Homes where repairs are under-reported
  - Homes where there has been a high repair demand
  - Homes with reported damp and mould
  - Areas where decarbonisation funding could be available
  - Homes that have not had an asset or stock condition survey within the last three years

## 5. Survey content

- 5.1. Stock condition surveys will identify:
- Work that needs to be included in future planned works
  - Work that may be needed in the future
  - Repairs that need doing now
  - Items and areas to be checked include:
    - Smoke / heat alarms, carbon monoxide alarms
    - Extractor fans or ventilation systems.
    - Doors and windows
    - Kitchens, bathrooms
    - Roofs and loft spaces
    - To check any water tanks and fire breaks.
    - Exterior and internal walls
    - Communal areas in blocks of flats.
- 5.2. This list is not exhaustive.

- 5.3. Where a resident requests an inspection by a surveyor for major works, the surveyor will carry out a stock condition survey to the property at the same time to minimise appointments for resident and prevent duplicate visits.
- 5.4. Although this policy is aimed at assessing the condition of dwellings, wherever possible surveyors will also include communal areas in blocks of flats and garages in the area,
- 5.5. Photographs will be taken of the areas inspected.

## **6. Access**

- 6.1. We want to ensure each property is inspected in a timely manner. We aim to work with our residents as flexibly as possible to make sure that appointments can be managed alongside their needs. This includes choice over the time that the survey will take place, but also the offer of direct contact details for customers to instigate a stock condition survey at their own convenience.
- 6.2. Methods of contact and procedures for no access are included in Appendix A.

## **7. Stock condition survey feedback**

- 7.1. Feedback from the survey will be given in writing to residents setting out the main findings.
- 7.2. A satisfaction survey will be sent to each resident following the stock condition survey so we can gather feedback directly from residents to understand what we are doing well and if there any areas we can improve.

## **8. Partnership working**

- 8.1. Internally, all Council teams have a role to play in ensuring that our homes are safe, well-maintained and issues are attended to. In particular, we will work closely with Housing Management, Cleaning and Clearance, Community Protection, Neighbourhood Services, and the Anti-Social Behaviour Team to resolve concerns found onsite that may not be strictly repairs-related.
- 8.2. We also work closely with external agencies such as West Sussex County Council, occupational therapy Connect and any other provider who may support customers in their homes should this need be identified.

## **9. Record keeping**

- 9.1. As part of the principle of 'making every contact count' customers will be invited to update information about family composition, contact details and any individual needs, preferences or protected characteristics. Customers may decline to give this

information and opt to be contacted instead by a housing officer or other trusted member of Crawley Homes.

- 9.2. All data collected during the survey, whether customer details, photographs or notes of the customer contact will be stored securely on our housing management system and treated in line with Crawley Borough Council and Crawley Homes' Privacy Notices, the e Data Protection Act 2018 (the Act) and the General Data Protection Regulation (GDPR).

## 10. Complaints or disputes about the policy

- 10.1. If you feel that this policy has been applied incorrectly you can escalate this through the council's complaints policy [Complaints | Crawley GOV.](#)

## 11. Equalities implications

- 11.1. An Equality Impact Assessment has been undertaken and has identified some actions to ensure accessible communication about the process, expectations and access.
- 11.2. We will ensure that the font size is legible, and a braille option is available. For residents whose first language is not English, we will provide a translation service if needed. We will also ensure that we communicate with nominated third parties or carers to ensure that they are fully updated to ensure we can effectively communicate with the resident.
- 11.3. Despite these potential communication needs or preferences, the overarching intent to provide safe and well-maintained homes for all our residents and the prioritisation of target categories of residents will better ensure that needs are met.

## 12. Environmental implications

- 12.1. The data collected from the Stock Condition Survey Programme will form the basis of the future decarbonisation programme and the decarbonisation strategy for Crawley Homes.
- 12.2. Collecting asset data from stock condition surveys in local government can have several environmental implications, both positive and negative:
- **Resource Consumption:** Conducting surveys may require the use of paper, electronic devices, transportation, and energy, which can contribute to resource consumption and carbon emissions. Minimising paper usage and employing energy-efficient methods can mitigate these impacts.
  - **Data Accuracy:** Accurate data collection can lead to more efficient asset management, reducing the need for unnecessary maintenance and replacements, which in turn can minimise resource consumption and waste generation.

- **Long-Term Sustainability Planning:** Gathering comprehensive data enables Crawley Homes to develop sustainable asset management strategies, such as prioritising investments in energy-efficient programmes or implementing renewable energy solutions.

12.3. Overall, whilst there are potential environmental implications associated with collecting asset data from stock condition surveys, proactive measures can be taken to minimise negative impacts and maximise the benefits to both the environment and to residents.

### 13. Staff training, monitoring and review

13.1. Training required for the Surveyors undertaking the Stock Condition Surveys will include:

- Working at height
- Lone working
- Survey completion and use of the Council's Housing Management System
- All training identified as 'core' on Crawley Homes' training matrix, including Equality and Diversity, customer care and safeguarding awareness.

13.2. Training requirements will be monitored and enhanced as required by the Council.

13.3. We will monitor the effectiveness of the programme by reviewing customer feedback via customer satisfaction surveys.

13.4. We will also monitor our approach through comments and complaints received, collating and reviewing feedback from residents.

### 14. Consultation

14.1. All policies are subject to resident consultation. As a minimum this includes each policy being placed before our Tenant and Leaseholder Action Panel (TLAP) for scrutiny, and drawing upon feedback gained through resident engagement activities. Wider consultation will also take place depending upon the nature, complexity or impact of a policy.

14.2. Details of consultation can be found in the Equality Impact Assessment relating to the policy and in consultation summary documents where consultation has been more wide-ranging.

14.3. All policies must also have agreement of Crawley Homes' SMT (Senior Management Team) and Cabinet.

## Appendix A: Definition of Terms

### **Decent Homes**

Standard set by the Government regarding the quality of social housing. A home is considered decent if it meets certain criteria, including being in a reasonable state of repair, having modern facilities, being free from hazards, and providing a reasonable degree of thermal comfort.

### **Equalities Impact Assessment (EIA)**

An assessment to identify whether there are any positive or negative impacts associated with the policy. If negative impacts are identified, then the policy should say how these will be addressed.

### **Fit for human habitation**

Refers to the condition of a residential property being suitable and safe for people to live in. It encompasses various factors such as structural integrity, sanitation, cleanliness, ventilation, heating, and protection from hazards like dampness or fire.

### **General Data Protection Regulation (GDPR)**

It is a comprehensive data protection law enacted by the European Union to regulate the processing of personal data of individuals. GDPR aims to strengthen data protection and privacy for individuals, giving them more control over their personal data and imposing strict obligations on organisations that handle such data.

### **Housing Health and Safety Rating System (HHSRS)**

A risk-based evaluation tool used in the UK to assess potential health and safety hazards in residential properties. The system helps local authorities identify hazards that could affect a resident's health or safety, such as dampness, fire risks and structural defects.

### **Net Zero**

Refers to achieving a balance between the amount of greenhouse gasses produced and the amount removed from the atmosphere. This balance is typically achieved by reducing emissions and offsetting any remaining emissions through measures like carbon capture or investments in renewable energy projects. The goal of net zero is to mitigate climate change by preventing further accumulation of greenhouse gasses in the atmosphere.

## **Appendix B: No Access Protocol – Stock Condition Surveys**

We will offer appointments between 08:00 to 17:00 Monday to Friday.

We will offer a morning or afternoon appointment, or the opportunity of a specific appointment time slot if necessary.

If these appointment times are unsuitable, under special circumstances we may make an appointment outside of these time frames.

We will initially write to residents with an overview of the stock condition survey programme and email and telephone details to request an appointment if preferred. Otherwise we will write to tenants offering them an appointment. This letter will include the appointment date and time slot plus contact details to change the appointment time if necessary.

### **Communication ahead of the stock condition survey**

A phone call will be made to confirm the appointment before the survey.

A text will be sent 24 hours before the appointment reminding the resident of the appointment.

### **If no access is provided**

If no access is provided to the property, a second letter will be issued with an appointment date and time slot.

The letter will provide details to reschedule to an alternative time should they require. The letter will inform the resident that if they fail to give access, this could lead to injunction proceedings. We will work with colleagues in housing management to ensure a sensitive and appropriate approach .

If no access is made from the second appointment, a third and final appointment time slot will be arranged, and a letter sent. This will warn of potential injunction proceedings if access is not granted.

If access is still not given, then legal proceedings will be issued, an injunction warning letter will be sent to enforce access.

Where resident have support needs, health conditions, communication needs or other factors underpinning the lack of access, a sensitive approach will be taken. This will be reviewed on a case-by-case basis and further support, if required, will be assessed with the housing officer.

Where access is not provided, we will liaise with the gas service team to try and arrange a joint appointment for access for both the stock condition survey and the gas service to ensure compliancy.

If legal proceedings are issued, an Equality Act 2010 assessment will be completed with the housing officer for that area.

APPENDIX D



## Crawley Homes CCTV Policy

<b>Policy Date</b>	
<b>TLAP approval</b>	<b>10.6.24</b>
<b>SMT approval</b>	<b>6.11.24</b>
<b>CMT approval</b>	<b>19.11.24</b>
<b>Cabinet Approval</b>	
<b>Review Date</b>	

## Contents

1.	Introduction.....	2
2.	Background and Legal Context .....	2
3.	Policy statement .....	2
4.	Roles and Responsibilities.....	3
	All staff and users of CCTV equipment .....	3
	Data Protection Officer (DPO).....	3
	Head of Crawley Homes.....	3
	Compliance, Health and Safety and Building Safety Manager .....	3
	Tenants and Leaseholders .....	4
5.	Camera locations and coverage .....	4
6.	Access to Images .....	4
7.	Third party requests for footage .....	5
8.	Data Protection and Subject Access Rights .....	5
9.	Retention Periods .....	6
10.	Private (domestic) installations.....	6
11.	Disputes or concerns regarding private installations.....	7
12.	Complaints or disputes about this policy .....	8
13.	Staff training, monitoring and review .....	8
14.	Equalities implications.....	8
15.	Consultation.....	8



## 1. Introduction

- 1.1 This policy applies to CCTV that is installed and used by Crawley Homes, which is Crawley Borough Council's landlord service
- 1.2 It outlines our use of CCTV placed in communal areas of our premises for the purpose of assisting with law enforcement, public safety and other functions. This policy sets out how we will comply with law and regulation in this area.
- 1.3 This policy also covers private (domestic) installation of CCTV or surveillance by our residents, leaseholders and shared owners, and the processes that must be followed in order for secure permission to install these systems.
- 1.4 This policy covers only CCTV that is the responsibility of Crawley Homes. It does not include CCTV surveillance in the wider public realm operated by Crawley Borough Council in conjunction with Sussex Police. These cameras are viewed and monitored by Sussex Police and any request to view CCTV footage should be made to Sussex Police via a Rights of Access Request.
- 1.5 A separate policy applies to body-worn cameras which are owned by the Safer Crawley Partnership and are worn by a limited number of operatives within our cleaning and clearance team.
- 1.6 A list of key definitions is set out in Appendix A.

## 2. Background and Legal Context

- 2.1 Technological advances and widened access have led to greatly increased surveillance activity, both by organisations in pursuit of their work, and individuals operating private systems. This increases the potential for breaches to privacy and the law relating to these systems.
- 2.2 Crawley Homes will abide at all times with the requirements and principles of all relevant legislation and codes of practice, including:
  - The Human Rights Act 1998
  - Protection of Freedoms Act 2012
  - The Data Protection Act 2018
  - The UK General Data Protection Regulation
  - Biometrics and Surveillance Commissioner's Surveillance Camera Code of Practice Amended Surveillance Camera Code of Practice (accessible version) - GOV.UK (www.gov.uk)
  - We will closely follow case law in our decision making regarding private installation of surveillance equipment, and in particular, the judgement in Fairhurst vs Woodard 2021.

## 3. Policy statement

- 3.1 We (Crawley Homes) operate CCTV within the parameters of Crawley Borough Council's Data Protection Policy and will comply with all relevant statutory guidelines and legislation applicable to us.
- 3.2 We use CCTV for the following purposes:
- To provide a safe and secure environment for residents, staff and visitors
  - To prevent the loss of or damage to public spaces, buildings and/or assets
  - To assist in the investigation of antisocial behaviour
  - Capturing evidence to support breach of tenancy and
  - To assist in the detection and prevention of crime and with law enforcement.
- 3.3. We will ensure that any installation or use of CCTV is proportionate to the impact of crime, loss, or antisocial behaviour, and carefully balances individuals' rights to privacy with our responsibilities as a landlord. As such, any installation, whether by or on behalf of Crawley Homes, or privately installed with our permission, will be carefully assessed, monitored and its impact assessed.

## 4. Roles and Responsibilities

### All staff and users of CCTV equipment

- 4.1 All staff and users with operational access to CCTV equipment are responsible for:
- Compliance with all procedures in this policy.
  - Reporting to management any CCTV equipment that is not working correctly or in accordance its purpose or appears to have been tampered with.

### Data Protection Officer (DPO)

- 4.2 The Head of Governance, People and Performance acts as the Data Protection Officer for Crawley Borough Council and is responsible for:
- Maintaining Crawley Borough Council's Corporate CCTV Register.
  - In conjunction with the Head of Crawley Homes, ensuring that a CCTV Privacy Impact Assessment is completed prior to the approval and installation of any CCTV within Crawley Homes
  - The investigation of any breaches of CCTV data (recordings and images)
  - Responding to Subject Access Requests (SAR) by individuals
  - In cases of a serious breach involving CCTV data, the DPO is responsible for reporting the matter to the Information Commissioners Office (ICO.)

## Head of Crawley Homes

- 4.3 The Head of Crawley Homes is accountable for ensuring the legitimate need and appropriate use of CCTV within Crawley Homes, including:
- Overseeing completion of a CCTV Privacy Impact Assessment. Where there is a high risk to personal privacy, this must be completed in conjunction with the Data Protection Officer. This ensures robust consideration of risks and the actions required to protect personal privacy.
  - Ensuring that appropriate consultation has taken place before installation of new CCTV systems.
  - Overall approval of installations, taking full account of evidence from the Privacy Impact Assessment and consultation feedback.
  - Authorising persons who may access, download or delete CCTV footage.

## Compliance Manager

- 4.4 The Compliance Manager is responsible for:
- Approval or retrospective approval of applications from residents for privately owned (domestic) cameras or surveillance equipment (including smart doorbells) at Crawley Homes properties (as set out in Appendix B of this policy)
  - Ensuring the maintenance and effective operation of Crawley Homes' CCTV surveillance equipment, so that it can be used and accessed in accordance with its intended purpose and in compliance with the law.
  - These tasks may be delegated to Crawley Homes' mechanical and electrical surveyor or compliance surveyor, in line with their role description and responsibilities.

## Tenants and Leaseholders

- 4.5 Tenants and leaseholders are responsible for ensuring they have the correct permissions, as set out in this policy, before installing private CCTV or any form of surveillance equipment within or in the grounds of their home (including smart doorbells.)
- 4.6 Compliance with all legal requirements under GDPR and DPA and Code of Practice outlined in section two.

## 5. Camera locations and coverage

- 5.1 Prior to the installation of any new council CCTV equipment, a CCTV Privacy Impact Assessment (PIA) will be conducted to ensure that the proposed installation is compliant with legislation and ICO guidance.
- 5.2 All CCTV installations and their locations will be recorded on Crawley Homes' CCTV Register. This is reviewed annually to ensure that any CCTV systems placed in these locations remain proportionate and fit for their intended purpose.
- 5.3 On occasion, Crawley Homes may access temporary or mobile surveillance. This will be subject to the same legal requirements and considerations within this policy.

5.4 Any use of surveillance equipment must be accompanied by clear, compliant 'CCTV in operation' signage, setting out the purpose and contact details of the operator.

## **6. Access to Images**

6.1 As CCTV recordings contain personal (and sometimes special category) data, there is a legal obligation to ensure that access is limited to those with a genuine need and that any data held meets technical requirements for information security. In the event of a data breach, prompt steps will be taken in accordance with the Council's procedures to mitigate the breach and to notify relevant parties.

6.2 Only relevant, authorised persons are permitted access to images obtained via CCTV. Authorisation is determined by the Head of Crawley Homes and recorded on Crawley Homes' CCTV register. No other individual will have the right to view or access any CCTV images and to do so would be considered a disciplinary matter.

6.3 Authorisation is based upon job position, the level of sensitivity of the information being viewed, and the purpose for viewing. Viewing is only permitted on a need-to-know basis, in order to investigate suspicious, illegal or antisocial activity. Currently, those permitted to access and view Crawley Homes' CCTV footage are limited to:

- Head of Crawley Homes
- Public Protection and Enforcement Manager
- Community Protection Operations Manager
- Antisocial Behaviour Team Manager
- Compliance Manager
- Compliance Surveyor
- Tenancy Services Manager, for CCTV within our neighbourhood housing stock and hostels
- Older Persons Service Manager, for CCTV within our sheltered schemes
- Area Housing Managers for each specific patch

6.4 In rare instances where one of the above-named persons are unable to review footage within the necessary timeframe, they may give documented permission to a delegated individual, provided that there is clear justification to do so and that the individual has appropriate Level Two CCTV operator's training. They must agree this via a request form to be held with the viewing log.

6.5 Any staff action relating to the operation, viewing or downloading of CCTV must be logged, including the name, date, time and purpose of the action. This includes any actions which change the field of vision, any downloads or deletion of footage. The record must be made as soon as possible after the action. This will be a record of access only and will not include details of what has been seen or any identifying details.

6.6 Some CCTV equipment in operation by Crawley Homes can be accessed remotely, including, for example, on a mobile phone or computer. Any remote operation, viewing or downloading will be logged in the same way as if doing so on site.

6.7 Any action relating to the viewing of images will be made away from public view, e.g. in a private room with no unauthorised persons present, in order to protect the privacy of the images.

## 7. Third party requests for footage

- 7.1 We work closely with the police, enforcement authorities and other agencies in order to detect illegal or antisocial behaviour and ensure the safety of our communities. These organisations may apply to us to view images or captured footage in order to fulfil their statutory duties or legal functions. To access CCTV footage, a request must be made in writing, including, where applicable, a crime number or case reference details to [DPO@crawley.gov.uk](mailto:DPO@crawley.gov.uk) or to

The Data Protection Officer  
Crawley Borough Council  
Town Hall  
The Boulevard  
Crawley  
RH10 1UZ

- 7.2 We will acknowledge receipt and ask for any further information we need to enable us to process your request.
- 7.3 We will only release footage for the purpose for which it was recorded, set out in section three of this policy, within 28 days of the incident, and in accordance with the law.

## 8. Data Protection and Subject Access Rights

- 8.1 Individuals whose personal data has been captured on CCTV have a right to access a copy of this data, unless an exemption applies within the law. The following rights apply:
- The right to make a Subject Access Request (SAR) for a copy of footage in which they are captured, subject to exemptions within the Data Protection Act 2018. However this must also be balanced against the rights and freedoms of others who may appear in that footage.
  - The right to object to processing where they believe that the field of vision or the siting of the camera is disproportionate to the stated purpose of the camera.
- 8.2. All subject access requests (SAR) will be reviewed by the Crawley Borough Council's Data Protection Office (DPO) and determined in accordance with the law.
- 8.3. Where there is an objection to the processing or siting of CCTV, the Council will consider the objection and review whether a lawful basis for processing can still be justified. Please visit [Data Protection rights request | Crawley GOV](#) for further details regarding how to make a request under your data protection right

## 9. Retention Periods

- 9.1 Crawley Homes' cameras are usually set to automatically over-write footage between 28 and 31 days after it is captured.
- 9.2 Where authorised bodies are granted access to data from surveillance cameras in order to carry out their statutory duties, copies may be made and provided securely for this purpose.
- 9.3 If footage is required for enforcement action or to support a case, it will be kept until the relevant case is closed or two years, whichever is the shortest.
- 9.4 These retention periods also apply to any footage or recordings passed to us from private installations, devices or recording equipment to assist with evidence collection, for example in investigation of antisocial behaviour cases.

## 10. Private (domestic) installations

- 10.1 Tenants and leaseholders must ask permission before the installation of any recording equipment, including CCTV cameras or smart doorbells. As a landlord, we are responsible for ensuring that your equipment does not cause a nuisance or disproportionate intrusion to others, and that the installation will not cause damage to communal walls or areas, safety or fire integrity of the building.
- 10.2 To request permission, please go to [Permissions for improvements | Crawley GOV](#) or contact us on 01293 438000.
- 10.3 If equipment has been installed without permission, retrospective permission must be sought. Any damage caused to the building by the installation will be rechargeable to the tenant.
- 10.4 We will grant any permissions in writing, setting out what equipment is covered and requirements for its installation, use and removal. The installation will be monitored to ensure our requirements are adhered to.
- 10.5 If the proposed equipment will capture recordings from outside the tenant or leaseholder's property boundary (for example, neighbouring homes or gardens, shared spaces or public areas) GDPR and the DPA requirements will apply. The tenant or leaseholder who owns the equipment is the person responsible for complying with the law.
- 10.6 The potential to capture images or recordings outside of the property boundary would not in itself prevent permission being given. We will base decisions on a range of factors including:
  - Any less intrusive remedy that can be explored with the householder - for example would additional security or lighting help or is there a housing management issue that could be resolved without the need for surveillance?
  - Can the camera/doorbell be sited in a different position, or privacy settings, filters or blocks used?
  - What the intention is for requesting to install equipment. If there is any concern from neighbours or any likelihood that its use would be inflammatory or disproportionate, we will refuse permission.

- Has the equipment been requested or supplied by a law enforcement agency or requested as a means of gathering evidence for a case?
- The signing of an agreement that the owner will abide by their responsibilities under data protection law, which are:

1. You must tell people that they are using recording equipment; for example a sign or letting those affected know. In most cases, it is best to inform your neighbours directly and ask if they would have any objection;
2. In most circumstances you must provide some of the recording if asked by a person whose images have been captured;
3. You will regularly or automatically delete footage;
4. In most circumstances you will delete recordings of people if they ask; and
5. If it is possible to do so, you will stop recording a person if they object to being recorded, For example, if you can point the camera in a different direction but still use it for the same purposes, e.g. keeping their property safe.

10.7 If you do not follow these requirements, you could be subject to regulatory action by the Information Commissioner's Office (including a fine) and could face legal action from individuals affected.

## **11. Disputes or concerns regarding private installations.**

11.1. If you have specific concerns about privately installed CCTV systems or smart doorbell operation, we suggest the following action as recommended by the Information Commissioner's office:

1. **Talk to the person concerned** in the first instance. If you would rather not speak with them in person, try writing a letter.
2. **Ask what the reason is for using CCTV** – If you understand why they are recording, it may put your mind at ease. You might even come to an agreement where you share the system. You can then both benefit from the camera's safety features.
3. **Explain your concerns** – the CCTV user may not understand why you are worried about being recorded. If you explain your reasons, they may change the position of the cameras.
4. **Ask to see what area is being recorded** –the footage captured by the camera may not be as intrusive as you think. Seeing an example of what the camera records may make you feel less concerned.

- 11.1 If you believe that the user of the CCTV is breaching data protection rules, you can complain to the Information Commissioner's Office.
- 11.2 If you are concerned that the equipment is being used inappropriately, or is causing nuisance, alarm or distress, you may also report this to our antisocial behaviour team to investigate. This may result in permission being revoked or renegotiated to bring it in line with the intention of this policy and prevent breaches of privacy. We will always take a proportionate and fair approach to resolve any concerns.
- 11.3 If you have concerns about the inappropriate filming of children or vulnerable people, please report this to the police immediately.

## **12. Complaints or disputes about this policy**

- 12.1 If you feel that this policy has been applied incorrectly you can escalate this through the council's complaints policy [Complaints | Crawley GOV.](#)

## **13. Staff training, monitoring and review**

- 13.1. All employees for Crawley Borough Council receive GDPR training during induction. Additionally, any individual with approval to access footage and recordings will receive further training to ensure appropriate safeguards. This will include level two CCTV operator training as well as sufficient training to operate the specific equipment they will access.
- 13.2. Training requirements will be reviewed annually and as part of induction of new employees to specific, related roles.
- 13.3. This policy will be reviewed every three years or in line with changing legislation or regulatory requirements. Incidents, cases and complaints involving CCTV will be considered within this in order to monitor the effectiveness of our approach and its impact upon tenants, leaseholders and shared owners.

## **14. Equalities implications**

- 14.1 An Equalities Impact Assessment has been completed in the development of this policy and no negative impacts have been identified.

## **15. Consultation**

- 15.1 All residents have the right to share their views and influence Crawley Homes' policy decisions. During the development of this policy, this included online surveys and consultation with our Tenant and Leaseholder Action Panel (TLAP)
- 15.2 All policies have the agreement of Crawley Homes' Senior Management Team, and the Portfolio Holder for Housing.



## Appendix 1: Definition of Terms

To aid the understanding of this document and the provisions of the Data Protection Act the following definitions are provided for assistance:-

**CCTV** stands for Closed Circuit Television. CCTV systems are designed to monitor a limited area. They are primarily used for surveillance and security purposes. Over time, CCTV technology has advanced significantly, incorporating new features and functionalities such as remote monitoring, motion detection, and face recognition.

**Data** is any information held or recorded in any form by a public authority.

**Data Controller** means the Council as the organisation who determines how data is processed.

**Data Processor** means any person, other than an employee of the Council, who processes data on behalf of the data controller

**Data Protection Act (DPA) 2018** controls how your personal information is used by organisations, businesses or the government.

The Data Protection Act 2018 is the UK's implementation of the General Data Protection Regulation (GDPR).

Everyone responsible for using personal data has to follow strict rules called 'data protection principles'. They must make sure the information is:

- used fairly, lawfully and transparently
- used for specified, explicit purposes
- used in a way that is adequate, relevant and limited to only what is necessary
- accurate and, where necessary, kept up to date
- kept for no longer than is necessary
- handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage

Under the Data Protection Act 2018, you have the right to find out what information the government and other organisations store about you. These include the right to:

- be informed about how your data is being used
- access personal data
- have incorrect data updated
- have data erased
- stop or restrict the processing of your data
- data portability (allowing you to get and reuse your data for different services)
- object to how your data is processed in certain circumstances

You also have rights when an organisation is using your personal data for:

- automated decision-making processes (without human involvement)

- profiling, for example to predict your behaviour or interests

**Data subject** is the individual about whom personal data is processed.

**GDPR** is the General Data Protection Regulation. The UK GDPR sits alongside the DPA 2018

**Personal Data** means Data which relates to a living individual who can be identified- (a) either directly from that data, or (b) indirectly from that data and other information which is in the possession of, or is likely to come into the possession of, the data controller, and includes any expression of opinion about the individual and any indication of the intentions of the data controller or any other person in respect of the individual.

**Privacy Notice** means a notice created by the data controller and made available to the data subject which explains how personal data is being processed.

**Special category data (Sensitive Personal Data)** means personal data consisting of information as to any of the following:-

- racial or ethnic origin
- political opinion
- religious beliefs or other beliefs of a similar nature
- membership of a trade union
- genetics;
- biometrics (where used for ID purposes);
- physical or mental health or condition
- sexual life or sexual orientation.
- personal data relating to criminal allegations, proceedings or convictions.

**Processing** means obtaining, recording or holding the information or data or carrying out any operation or set of operations on the information or data including organisation, adaptation or alteration, disclosure and destruction of the information or data and includes onward disclosure or sharing.

**APPENDIX E Equality Impact Assessments to accompany Housing Policies**

**Compensation Policy EIA**

**1. Introduction**

<b>Division:</b>	Crawley Homes
Name of activity:	<b>Compensation Policy</b>
<b>Type of activity:</b>	A new policy or strategy
<b>Completed by:</b>	Georgia Leigh
<b>Date completed:</b>	28/10/24
<b>Date approved by Head of Service</b>	Click or tap to enter a date.

**2. About the activity**

*Please note the term “activity” is used here to include any new services proposed for introduction, changes to an existing service, withdrawal of an existing service, any new policy or strategy or change to an existing policy or strategy, and any project.*

<b>What is the main purpose of the activity?</b> <i>Please explain in a short paragraph</i>
A framework for when compensation should be considered, what reasonable compensation would be and who has the authority to decide it.
<b>Why is it being introduced / reviewed / changed?</b> <i>This could be, for example because of new government legislation or guidance, changing services user needs, or financial reasons</i>
There is a clear need for some guidance and understanding of authorities in order to make reasonable recompense for service failures but also to protect the Housing Revenue Account from inappropriate compensation awards. Compensation has been a focus for the Housing Ombudsman, who offers guidance on what should be the contents of the policy and to whom we report on our complaints handling, remedies and actions. It has been highlighted by TLAP, our Tenants and Leaseholders Action Group as an issue warranting attention, through their recommendations from their complaints handling subgroup, and by the Overview and Scrutiny Committee (OSC) and cabinet, in response to our complaints handling data.

<p>In order to meet the Transparency and Accountability consumer standard, it is necessary to have clear resident-facing policies.</p> <p>The Housing Ombudsman's dispute resolution principles are that landlords act fairly, put things right and learn from mistakes. The compensation policy sets out how we will do this when things go wrong.</p>	
<p><b>Who is the intended audience or target group?</b></p>	
Internal audience or group:	Staff & Councillors
External audience or group:	Residents who use a particular service (please specify below)
<p><b>If other, please specify below and provide details how the audience or target group will benefit?</b></p>	
<p>Crawley Homes Residents</p>	
<p><b>Have you already consulted on / researched the activity?</b>  <i>Please provide a brief explanation of the work that has been undertaken and any key findings / data. Are there any gaps that need further investigation?</i></p>	
<p>Our annual complaints performance and service improvement report 2023-4 looked at the different remedies offered to complainants and found that these varied widely, and also that financial compensation was offered significantly fewer times at stage one than at stage two, often leading to stage two complaints.</p> <p>We have invited scrutiny of complaints from TLAP and have feedback from TLAP'S complaints subgroup that compensation awards are sometimes excessive and sometimes inadequate and that a framework is needed to offer fairness and transparency. There have also been occasions where financial compensation was not the most appropriate remedy. We have taken this on board in the drafting of this policy.</p> <p>We have taken on board recommendations from the Housing Ombudsman, based upon their review of evidence in the wider sector.</p> <p>TLAP, SMT and Portfolio have commented on the final draft.</p>	

### 3. Assessing potential impact

When undertaking your assessment, it is important to think about every stage of the process regarding the activity. This includes the design phase, consultation, delivery phase and post completion of the activity. Information about the protected characteristic groups as defined by the Equality Act is available [here](#). You should also use this assessment to consider impacts on other vulnerable groups such as those on low incomes.

<b>Impact on people with a protected characteristic</b>	
Is there a potential positive or negative impact based on the following?	
<b>Age</b> (older / younger people, children)	Positive
<b>Disability</b> (people with physical / sensory impairment or mental disability)	Positive
<b>Gender reassignment</b> (the process of transitioning from one gender to another.)	Positive
<b>Marriage &amp; civil partnership</b> (Marriage is defined as a 'union between a man and a woman'. Civil partnerships are legally recognised for same-sex couples)	Positive
<b>Pregnancy &amp; maternity</b> (Pregnancy is the condition of being pregnant & maternity refers to the period after the birth)	Positive
<b>Race</b> (ethnicity, colour, nationality or national origins & including gypsies, travellers, refugees & asylum seekers)	Positive
<b>Religion &amp; belief</b> (religious faith or other group with a recognised belief system)	Positive
<b>Sex</b> (male / female)	Positive
<b>Sexual orientation</b> (heterosexual, gay, lesbian, or bisexual,)	Positive
Whilst <b>Socio economic</b> disadvantage that people may face is not a protected characteristic; the potential impact on this group should be also considered	Negative

<b>What evidence has been used to assess the likely impacts?</b>
<i>(e.g. demographic profiles, research reports, academic research, benchmarking reports, consultation activities, staff surveys, customer surveys, public surveys, complaints, grievances, disciplinary cases, employment tribunal cases, ombudsman cases, media reports)</i>
Ombudsman research and spotlights, complaints data at stage one and stage two, ombudsman cases. These demonstrate the need for an approach which takes into account the personal impact on the person who has experiences service failure and the level that this impacts them. Taking this personalised approach will lead to a positive impact on those sharing the above protected characteristics as their unique experience will be taken into account.
<b>What resource implications are there to deliver actions from this EIA?</b>

<i>(Quantify: people, time, budget, etc.)</i>	
<p>Training on this policy – all staff will need an understanding of their own authorities and limitations in order to deliver this policy correctly and improve customer experience.</p> <p>Budget The Housing Ombudsman expects us to consider compensation as part of complaint handling and may even make its own orders for compensation if a complaint escalates that far. For example in 23/24 we received one order from the Housing Ombudsman requiring the Council to pay £1,425. There are existing compensation budgets within Crawley Homes. It is likely that budgetary implications will be neutral as compensation awards stabilise and are fairly applied; however, this will need to be monitored.</p>	

**4. Outcome following initial assessment**

<b>Does the activity have a <u>positive</u> impact on any of the protected groups, or contribute to promoting equality, equal opportunities and improving relations within target groups?</b>	Yes
<p>The policy offers additional ways for service failures to be rectified other than having to raise a formal complaint – a process which some customers might be deterred from using due to language, access to resources or time constraints.</p> <p>It brings some level of transparency and accountability in order to be able apply compensation fairly and monitor access to redress.</p>	
<b>Does the activity have a <u>negative</u> impact on any of the protected groups, i.e. disadvantage them in any way?</b>	Yes
<p>The policy potentially has a negative impact for residents who do not have recourse to home contents insurance or due to low income or disadvantage cannot access this or believe that they cannot.</p> <p>This is not a change to the existing position but may lead to a more rigid enforcement of the expectation to claim on insurance.</p>	

**5. Decision following the initial assessment**

Continue with existing activity or introduce new / planned activity	<b>Yes</b>
---	------------

Amend activity based on identified actions	No
--	----

<b>Has the EIA identified any positive or negative impact on any of the protected groups which requires action?</b> <i>e.g., adjustments to the approach or documents, changes to terminology, broadening parameters of policy, etc. If so, record any actions to be undertaken and monitored</i>			
Impact identified	Action required	Lead Officer	Deadline
Access to other remedy for loss or damage/insurance	Ensure that low cost, specialist insurance for tenants of social housing is promoted at all opportunities and that tenants are periodically reminded.	Clare Prosser	Ongoing

**6. Monitoring & Review**

<b>How do you propose to monitor and review the impact of your proposal?</b> <i>Please outline how you will monitor the impact of your proposal, once implemented, on protected characteristic groups, and what the mechanisms for review are.</i>
This policy will be reviewed every three years or sooner if there are changes to legislation or regulation.  Complaints data, including compensation awards will be reviewed each three months.

<b>Date of last review or Impact Assessment:</b>	11/11/24
--	----------

<b>Date of next 12-month review:</b>	11/11/25
<b>Date of next 3-year Impact Assessment (from the date of this EIA):</b>	11/11/27
<b>Date Sent to HR and Organisational Development Team:</b>	Click or tap to enter a date.



## Short-term alternative accommodation EIA

### 1. Introduction

<b>Division:</b>	Crawley Homes
<b>Name of activity:</b>	<b>Short-term alternative accommodation</b>
<b>Type of activity:</b>	A new policy or strategy
<b>Completed by:</b>	Georgia Leigh
<b>Date completed:</b>	13/11/24
<b>Date approved by Head of Service</b>	Click or tap to enter a date.

### 2. About the activity

*Please note the term “activity” is used here to include any new services proposed for introduction, changes to an existing service, withdrawal of an existing service, any new policy or strategy or change to an existing policy or strategy, and any project.*

<b>What is the main purpose of the activity?</b> <i>Please explain in a short paragraph</i>
To clarify the circumstances and arrangements when a resident needs to be moved into short term alternative accommodation during works or emergencies affecting their home.
<b>Why is it being introduced / reviewed / changed?</b> <i>This could be, for example because of new government legalisation or guidance, changing services user needs, or financial reasons</i>
There is no previous policy and there is a need to ensure that all staff are operating within the law and regulatory requirements. .  There is a clear need for some guidance to all parties about minimising the need for the disruption, expense and distress that can arise from moving people out of their homes on a short-term basis to undertake work on their home. The Housing Ombudsman has made this a focus, with there being high profile maladministration findings in relation to the handling of complaints about this process. Complaints made to Crawley Homes include service failures and miscommunications in this area and the annual complaints review highlighted the need for a clear policy as an action. TLAP, our Tenants and Leaseholders Action Group have also highlighted concerns and contributed to the development of this policy. Additionally, the Transparency and Accountability consumer standard, requires clear resident-facing information, of which this policy is a part.

Who is the intended audience or target group?	
Internal audience or group:	Staff & Councillors
External audience or group:	Residents who use a particular service (please specify below)
If other, please specify below and provide details how the audience or target group will benefit?	
Crawley Homes Residents	
Have you already consulted on / researched the activity?	
<i>Please provide a brief explanation of the work that has been undertaken and any key findings / data. Are there any gaps that need further investigation?</i>	
<p>We have taken on board recommendations from the Housing Ombudsman, based upon their review of evidence in the wider sector.</p> <p>TLAP scrutinised the policy and made some recommendations. TLAP, SMT and Cabinet have commented on the final draft.</p> <p>Some language, clarity and process issues have been identified and addressed as a result of these recommendations.</p>	

### 3. Assessing potential impact

When undertaking your assessment, it is important to think about every stage of the process regarding the activity. This includes the design phase, consultation, delivery phase and post completion of the activity. Information about the protected characteristic groups as defined by the Equality Act is available [here](#). You should also use this assessment to consider impacts on other vulnerable groups such as those on low incomes.

Impact on people with a protected characteristic	
Is there a potential positive or negative impact based on the following?	
<b>Age</b> (older / younger people, children)	Positive
<b>Disability</b> (people with physical / sensory impairment or mental disability)	Positive

<b>Gender reassignment</b> (the process of transitioning from one gender to another.)	Neutral
<b>Marriage &amp; civil partnership</b> (Marriage is defined as a 'union between a man and a woman'. Civil partnerships are legally recognised for same-sex couples)	Neutral
<b>Pregnancy &amp; maternity</b> (Pregnancy is the condition of being pregnant & maternity refers to the period after the birth)	Neutral
<b>Race</b> (ethnicity, colour, nationality or national origins & including gypsies, travellers, refugees & asylum seekers)	Positive
<b>Religion &amp; belief</b> (religious faith or other group with a recognised belief system)	Positive
<b>Sex</b> (male / female)	Positive
<b>Sexual orientation</b> (heterosexual, gay, lesbian, or bisexual,)	Positive
Whilst <b>Socio economic</b> disadvantage that people may face is not a protected characteristic; the potential impact on this group should be also considered	Neutral

<p><b>What evidence has been used to assess the likely impacts?</b>  <i>(e.g. demographic profiles, research reports, academic research, benchmarking reports, consultation activities, staff surveys, customer surveys, public surveys, complaints, grievances, disciplinary cases, employment tribunal cases, ombudsman cases, media reports)</i></p>
<p>Ombudsman research and spotlights, complaints data at stage one and stage two, ombudsman cases. These demonstrate the need for a person-centered approach that addresses the ways that residents could be disadvantaged by this process and to identify and prevent this. Without this approach, those with a protected characteristic could be disproportionately affected by moving from their home. Negative impacts could include being removed from the locality of places of worship, caring responsibilities or homes that have been adapted to meet specific disability needs. These are addressed in the policy and the planning process it introduces.</p>
<p><b>What resource implications are there to deliver actions from this EIA?</b>  <i>(Quantify: people, time, budget, etc.)</i></p>

Training on this policy – Teams will need an understanding of their roles in delivering this policy correctly and working together to improve the customer experience when a short-term move becomes necessary. In particular, they will need to understand their responsibilities under the Equality Act 2010, housing legislation and the incoming Awaab’s law.

Financial implications - associated costs are already considered and paid but this policy formalises the approach and creates certainty for the resident. As a result we do not expect that costs will increase with any significance. There are also management controls in place to oversee, challenge and verify officer decisions for temporary moves to help limit demand and ensure that temporary moves are only agreed in exceptional circumstances.

The policy may increase the expectations and range of tasks on the Housing Management Team when short term accommodation is to be found. However, it is envisaged that these instances will be rare and that planning early for any disruption will reduce issues later.

#### 4. Outcome following initial assessment

<b>Does the activity have a <u>positive</u> impact on any of the protected groups, or contribute to promoting equality, equal opportunities and improving relations within target groups?</b>	Yes
The policy ensures that specific requirements relating to protected characteristics are addressed.	
<b>Does the activity have a <u>negative</u> impact on any of the protected groups, i.e. disadvantage them in any way?</b>	No
Negative impacts could include being removed from the locality of places of worship. caring responsibilities or homes that have been adapted to meet specific disability needs. However, these are addressed and mitigated by this policy.	

#### 5. Decision following the initial assessment

Continue with existing activity or introduce new / planned activity	<b>Yes</b>
Amend activity based on identified actions	<b>No</b>

<b>Has the EIA identified any positive or negative impact on any of the protected groups which requires action?</b> <i>e.g., adjustments to the approach or documents, changes to terminology, broadening parameters of policy, etc. If so, record any actions to be undertaken and monitored</i>			
Impact identified	Action required	Lead Officer	Deadline
Training required to ensure impacts are correctly understood and addressed.	Equalities training covering reasonable adjustments, the potential experience of those who share protected characteristics and responsibilities under the law to be completed by all staff included in this process. Many staff will already have had this training, so training needs will be identified where this is not the case.	Georgia Leigh	November 2025

**6. Monitoring & Review**

<b>How do you propose to monitor and review the impact of your proposal?</b> <i>Please outline how you will monitor the impact of your proposal, once implemented, on protected characteristic groups, and what the mechanisms for review are.</i>
This policy will be reviewed every three years or sooner if there are changes to legislation or regulation. We will monitor complaints about this process to assess the impact of this policy in addressing issues.

--

<b>Date of last review or Impact Assessment:</b>	11/11/24
<b>Date of next 12-month review:</b>	11/11/25
<b>Date of next 3-year Impact Assessment (from the date of this EIA):</b>	11/11/27
<b>Date Sent to HR and Organisational Development Team:</b>	Click or tap to enter a date.

## Stock Condition Policy EIA

### 1. Introduction

<b>Division:</b>	Crawley Homes
<b>Name of activity:</b>	<b>Stock Condition Policy EIA</b>
<b>Type of activity:</b>	A new policy or strategy
<b>Completed by:</b>	Robyn Comolli
<b>Date completed:</b>	12/11/24
<b>Date approved by Head of Service</b>	Click or tap to enter a date.

### 2. About the activity

*Please note the term “activity” is used here to include any new services proposed for introduction, changes to an existing service, withdrawal of an existing service, any new policy or strategy or change to an existing policy or strategy, and any project.*

<b>What is the main purpose of the activity?</b>	
<i>Please explain in a short paragraph</i>	
Click or tap here to enter text. The stock condition survey programme policy aims to establish a framework for assessing the condition of our housing stock, ensuring the well-being and safety of our residents while optimising the efficiency of our maintenance investment strategies.	
<b>Why is it being introduced / reviewed / changed?</b>	
<i>This could be, for example because of new government legislation or guidance, changing services user needs, or financial reasons</i>	
The Social Housing Act 2023 introduced consumer standards which require registered providers must have an accurate, up to date and evidenced understanding of the condition of their homes that reliably informs their provision of good quality, well maintained and safe homes for tenants. This is good asset management practice to ensure the Council protects and invests in its assets.	
<b>Who is the intended audience or target group?</b>	
Internal audience or group:	Staff & Councillors
External audience or group:	Residents who use a particular service (please specify below)
<b>If other, please specify below and provide details how the audience or target group will benefit?</b>	

Crawley Homes Residents
<b>Have you already consulted on / researched the activity?</b> <i>Please provide a brief explanation of the work that has been undertaken and any key findings / data. Are there any gaps that need further investigation?</i>
A stock condition survey working group was created with the key stakeholders across the Landlord Service (Crawley Homes). This group included the Head of Service, Planned Maintenance Manager, Decarbonisation Manager, Area Surveyors, I.T Project Administrator, and the Disabled Adaptations Manager to use their experience and shape the policy.  A Repairs, Maintenance and Stock Condition Workshop with over 20 residents and members of TLAP was held to discuss and decide on key factors of the policy.  SMT and the Portfolio to comment on the final draft.

### 3. Assessing potential impact

When undertaking your assessment, it is important to think about every stage of the process regarding the activity. This includes the design phase, consultation, delivery phase and post completion of the activity. Information about the protected characteristic groups as defined by the Equality Act is available [here](#). You should also use this assessment to consider impacts on other vulnerable groups such as those on low incomes.

<b>Impact on people with a protected characteristic</b>	
Is there a potential positive or negative impact based on the following?	
<b>Age</b> (older / younger people, children)	Negative
<b>Disability</b> (people with physical / sensory impairment or mental disability)	Positive
<b>Gender reassignment</b> (the process of transitioning from one gender to another.)	Neutral
<b>Marriage &amp; civil partnership</b> (Marriage is defined as a 'union between a man and a woman'. Civil partnerships are legally recognised for same-sex couples)	Neutral
<b>Pregnancy &amp; maternity</b> (Pregnancy is the condition of being pregnant & maternity refers to the period after the birth)	Neutral



<b>Race</b> (ethnicity, colour, nationality or national origins & including gypsies, travellers, refugees & asylum seekers)	Negative
<b>Religion &amp; belief</b> (religious faith or other group with a recognised belief system)	Neutral
<b>Sex</b> (male / female)	Neutral
<b>Sexual orientation</b> (heterosexual, gay, lesbian, or bisexual,)	Neutral
Whilst <b>Socio economic</b> disadvantage that people may face is not a protected characteristic; the potential impact on this group should be also considered	Positive

<p><b>What evidence has been used to assess the likely impacts?</b>  <i>(e.g. demographic profiles, research reports, academic research, benchmarking reports, consultation activities, staff surveys, customer surveys, public surveys, complaints, grievances, disciplinary cases, employment tribunal cases, ombudsman cases, media reports)</i></p>
<p>Benchmarking with similar projects such as SDHF and the Disabled adaptations EIA. Ombudsman cases - complaint outcomes.</p>
<p><b>What resource implications are there to deliver actions from this EIA?</b>  <i>(Quantify: people, time, budget, etc.)</i></p>
<p><b>Staffing</b> This forms part of the Crawley Homes Planned Works Growth Bid. Three surveyors to be appointed.</p>
<p><b>Financial</b> The cost of stock condition surveyors are already accounted for in budgets following a growth item in 2023/24 in line with report CH/203. However, in the process of developing our understanding of stock condition, capital investment may be required over the longer term to meet requirements of the Consumer Standards and decent homes standards (a revision to the latter is expected).</p>

**4. Outcome following initial assessment**

<p>Does the activity have a <u>positive</u> impact on any of the protected groups, or contribute to promoting equality, equal opportunities and improving relations within target groups?</p>	<p>Yes</p>
---	------------

<p>Socio-Economic – No evidence per se, but anecdotal.                  Disabilities – persons with disabilities or health needs will be prioritised.</p>	
<p><b>Does the activity have a <u>negative</u> impact on any of the protected groups, i.e. disadvantage them in any way?</b></p>	<p>Yes</p>
<p>There are legal implications arising from any non-access for stock condition surveys. It is vital that information is communicated in accordance with customer preferences and takes into account language or disability-related communication issues. See mitigation below.</p> <p>For various reasons, customers may have preferences for who is able to visit their home and at what time, for example if a religious practise prevents access at particular times of day, or a customer has experienced domestic abuse and prefers a particular member of staff to be present. This is reflected in the policy and in the no access arrangements.</p>	

**5. Decision following the initial assessment**

Continue with existing activity or introduce new / planned activity	<b>Yes</b>
Amend activity based on identified actions	<b>No</b>

<p><b>Has the EIA identified any positive or negative impact on any of the protected groups which requires action?</b>  <i>e.g., adjustments to the approach or documents, changes to terminology, broadening parameters of policy, etc. If so, record any actions to be undertaken and monitored</i></p>			
Impact identified	Action required	Lead Officer	Deadline
Letter type front being too small	Provide the information letter in a font size that is legible to the resident.	Robyn Comolli	

Visually impaired resident not able to read letter	Ensure that the existing mechanisms (such as braille) that have been identified in effective communication with resident are established.	Robyn Comolli	
English not as a first language - letter	Ensure the first language is identified and the letter translated effectively.	Robyn Comolli	
Resident not understanding the letter detailing the works	Ensure that the existing mechanisms (such as key worker) that have been identified in effective communication with resident are established.	Robyn Comolli	

## 6. Monitoring & Review

<p><b>How do you propose to monitor and review the impact of your proposal?</b></p> <p><i>Please outline how you will monitor the impact of your proposal, once implemented, on protected characteristic groups, and what the mechanisms for review are.</i></p> <p>This policy will be reviewed annually.</p>
--

<b>Date of last review or Impact Assessment:</b>	12/11/24
<b>Date of next 12-month review:</b>	12/11/25
<b>Date of next 3-year Impact Assessment (from the date of this EIA):</b>	Click or tap to enter a date.
<b>Date Sent to HR and Organisational Development Team:</b>	Click or tap to enter a date.

## CCTV Policy EIA

### 1. Introduction

<b>Division:</b>	Crawley Homes
<b>Name of activity:</b>	CCTV
<b>Type of activity:</b>	A new policy or strategy
<b>Completed by:</b>	Georgia Leigh
<b>Date completed:</b>	28/10/24
<b>Date approved by Head of Service</b>	Click or tap to enter a date.

### 2. About the activity

*Please note the term “activity” is used here to include any new services proposed for introduction, changes to an existing service, withdrawal of an existing service, any new policy or strategy or change to an existing policy or strategy, and any project.*

<b>What is the main purpose of the activity?</b>
<i>Please explain in a short paragraph</i>
To clarify the use and operation of CCTV at premises managed by Crawley Homes
<b>Why is it being introduced / reviewed / changed?</b>
<i>This could be, for example because of new government legislation or guidance, changing services user needs, or financial reasons</i>
There is no previous policy and there is a need to ensure that all staff are operating within the law and GDPR.
There has been an increase in demand for and access to personal surveillance equipment, most notably smart doorbells and private CCTV systems.
<b>Who is the intended audience or target group?</b>

Internal audience or group:	Staff & Councillors
External audience or group:	Residents who use a particular service (please specify below)
<b>If other, please specify below and provide details how the audience or target group will benefit?</b>	
Crawley Homes Residents . The wider general public.	
<b>Have you already consulted on / researched the activity?</b> <i>Please provide a brief explanation of the work that has been undertaken and any key findings / data. Are there any gaps that need further investigation?</i>	
<p>This policy is based upon the guidance of the Information Commissioner’s Office (ICO) and Sussex Police. It incorporates the necessary codes of practise and privacy stipulations.</p> <p>The policy went out to online consultation in March 2024. Over 100 responses were made, and a feedback summary created from these. Feedback has been incorporated into the policy, and feedback not incorporated has been noted.</p> <p>Staff were also invited to feed back their views. Representatives of teams affected were consulted during March and April 2024.</p> <p>TLAP have scrutinised the policy and made recommendations. TLAP, SMT and Cabinet have commented on the final draft.</p>	

### 3. Assessing potential impact

When undertaking your assessment, it is important to think about every stage of the process regarding the activity. This includes the design phase, consultation, delivery phase and post completion of the activity. Information about the protected characteristic groups as defined by the Equality Act is available [here](#). You should also use this assessment to consider impacts on other vulnerable groups such as those on low incomes.

<b>Impact on people with a protected characteristic</b>	
Is there a potential positive or negative impact based on the following?	
<b>Age</b> (older / younger people, children)	Neutral
<b>Disability</b> (people with physical / sensory impairment or mental disability)	Positive
<b>Gender reassignment</b> (the process of transitioning from one gender to another.)	Positive
<b>Marriage &amp; civil partnership</b> (Marriage is defined as a 'union between a man and a woman'. Civil partnerships are legally recognised for same-sex couples)	Neutral
<b>Pregnancy &amp; maternity</b> (Pregnancy is the condition of being pregnant & maternity refers to the period after the birth)	Neutral
<b>Race</b> (ethnicity, colour, nationality or national origins & including gypsies, travellers, refugees & asylum seekers)	Positive
<b>Religion &amp; belief</b> (religious faith or other group with a recognised belief system)	Positive
<b>Sex</b> (male / female)	Positive
<b>Sexual orientation</b> (heterosexual, gay, lesbian, or bisexual,)	Positive
Whilst <b>Socio economic</b> disadvantage that people may face is not a protected characteristic; the potential impact on this group should be also considered	Neutral

**What evidence has been used to assess the likely impacts?**

<i>(e.g. demographic profiles, research reports, academic research, benchmarking reports, consultation activities, staff surveys, customer surveys, public surveys, complaints, grievances, disciplinary cases, employment tribunal cases, ombudsman cases, media reports)</i>
Staff and customer feedback. Analysis of complaints where CCTV has been unavailable or not provided in accordance with the ICO code. Analysis of ASB issues and case review when a hate incident has been alleged or reported.
<b>What resource implications are there to deliver actions from this EIA?</b> <i>(Quantify: people, time, budget, etc.)</i>
Training on this policy – all staff will need an understanding of their own authorities and limitations in order to deliver this policy correctly and improve customer experience, paying due regard to equalities issues.
There may be an uplift in requests for permission for personal monitoring equipment, which could temporarily increase time spent by surveyors to address.
No additional costs are anticipated as a direct result of this policy but over time we may make further investment in CCTV if there is a proven need for additional security measures at a particular scheme and/or designs for new build properties incorporate CCTV provision which as a result would bring more schemes within the remit of this policy

**4. Outcome following initial assessment**

<b>Does the activity have a <u>positive</u> impact on any of the protected groups, or contribute to promoting equality, equal opportunities and improving relations within target groups?</b>	Yes
The Policy enables a robust approach to the provision of CCTV evidence in the event of hate incidents.	
<b>Does the activity have a <u>negative</u> impact on any of the protected groups, i.e. disadvantage them in any way?</b>	No

--

**5. Decision following the initial assessment**

Continue with existing activity or introduce new / planned activity	<b>Yes</b>
Amend activity based on identified actions	<b>No</b>

<b>Has the EIA identified any positive or negative impact on any of the protected groups which requires action?</b> <i>e.g., adjustments to the approach or documents, changes to terminology, broadening parameters of policy, etc. If so, record any actions to be undertaken and monitored</i>			
Impact identified	Action required	Lead Officer	Deadline
None			

**6. Monitoring & Review**



<b>How do you propose to monitor and review the impact of your proposal?</b>
<i>Please outline how you will monitor the impact of your proposal, once implemented, on protected characteristic groups, and what the mechanisms for review are.</i>
This policy will be reviewed every three years or sooner if there are changes to legislation or regulation.

<b>Date of last review or Impact Assessment:</b>	11/11/24
<b>Date of next 12-month review:</b>	11/11/25
<b>Date of next 3-year Impact Assessment (from the date of this EIA):</b>	11/11/27
<b>Date Sent to HR and Organisational Development Team:</b>	Click or tap to enter a date.

This page is intentionally left blank

# Agenda Item 8

## Crawley Borough Council

### Report to Cabinet 15 January 2025

#### Community Infrastructure Levy (CIL) Strategic Infrastructure Strand Review

Report of the Head of Economy and Planning, PES/470

#### 1. Purpose

- 1.1. To present to Cabinet the outcome of the officer review of the CIL Strategic Infrastructure strand, comprising the following:
- An update on the collection and administration of Community Infrastructure Levy (CIL) monies (see sections 5 to 6 of this report).
  - The proposed CIL strategic infrastructure strand spend priorities to the end of March 2026 and an indication of some future allocations beyond that date (see sections 8 and 9).
  - The proposed commitment of CIL Strategic Infrastructure strand monies to a priority project led by the Highway Authority.
- 1.2. To update Cabinet on the current and proposed future spend allocations for the CIL Neighbourhood Improvement Strand, including to enable ongoing delivery of the Unsupervised Play Improvement programme (sections 11 and 12).

#### 2. Recommendations

- 2.1. That the Cabinet is recommended to:
- a) Approve the proposed CIL strategic infrastructure spend priorities 2025-29.
  - b) Approve that the amount of CIL Strategic Infrastructure strand monies ringfenced for the Three Bridges Station Improvement scheme be increased from £1,100,000 to £2,050,000.
  - c) Approve that £432,000 CIL Strategic Infrastructure monies be committed to the A23/ Manor Royal junction project in order for the Highway Authority to draw down the CIL funds.
  - d) Approve the removal of the Saxonbrook Medical Centre and Pound Hill Medical Group projects from the CIL strategic infrastructure strand priority list of projects for 2025-2029, subject to final confirmation from the NHS that the projects are no longer forthcoming.
  - e) Delegate authority to the Head of Economy and Planning, in consultation with the Head of Corporate Finance and the Head of Community Services to allocate any unspent Neighbourhood Improvement Fund monies and subsequent CIL Neighbourhood Improvement Strand receipts to enable the

# Agenda Item 8

delivery of the Unsupervised Play Improvement Programme and noting that funds will then need to be committed to individual projects within the programme through a separate approvals process.

## **3. Reasons for the Recommendations.**

- 3.1. To provide clarity on the way forward for Crawley's Infrastructure Business Plan and the priority schemes for the CIL Strategic Infrastructure strand spend.
- 3.2. To increase the amount of CIL Strategic Infrastructure strand monies ringfenced for the Three Bridges Station Improvement scheme in recognition of the need for additional budget to deliver the scheme arising from the station change procedure led by the railway authorities and due to increased construction / materials costs.
- 3.3. Approval of £432,000 of CIL Strategic Infrastructure strand monies for the A23 / Manor Royal junction project will allow the Highway Authority to offset the expenditure incurred and to complete the project.
- 3.4. The Saxonbrook Medical Centre and Pound Hill Medical Group projects have previously been listed amongst the CIL Strategic Infrastructure strand priority projects. However, these schemes appear no longer to be considered to be a priority by the NHS – therefore it is proposed they are removed from the priority list, pending alternative project proposals to be brought forward by the NHS.
- 3.5. The delegation of authority to officers to allocate subsequent CIL Neighbourhood Improvement Strand receipts to the ongoing delivery of the Unsupervised Play Improvement Programme will allow a seamless continuation of the phases of delivery of the programme and it's roll out across the Borough. Allocations of monies to individual project schemes will still be subject to the required approvals process. Further information is provided in section 12.2 of this report.
- 3.6. In November 2022, Cabinet approved the implementation of a new "hybrid" model for the Neighbourhood Improvement Strand (NIS), which retained £75,000 from the CIL NIS, to maintain the Neighbourhood Improvement Fund with an annual contribution of £25,000, from the CIL NIS, until March 2025. It is proposed that any unspent CIL NIS monies from the Neighbourhood Improvement Fund at the end of March 2025 be reallocated to the Council's Unsupervised Play Improvement programme.

## **4. Background to CIL / Strategic Infrastructure Strand.**

- 4.1. The Community Infrastructure Levy (CIL) is a charge which can be levied by local authorities on new development in their area. CIL was introduced by the Planning Act 2008 and is governed by the Community Infrastructure Levy Regulations 2010 (as amended). It is an important tool for local authorities to secure financial resources to help them deliver the infrastructure needed to support development in their area on the basis that it accords with infrastructure priorities identified to facilitate population and employment growth set out in the Local Plan.
- 4.2. The CIL charge is based on a calculation related to £'s per m<sup>2</sup> of net additional floorspace and is payable on 'buildings that people normally go into'. The charge

# Agenda Item 8

applies to development of 100m<sup>2</sup> or more, or the creation of a single residential dwelling, even if under 100m<sup>2</sup>. [Annual CIL Rate Summary 2024.pdf \(crawley.gov.uk\)](#)

- 4.3. CIL rates payable for different types of development are set by the council's CIL Charging Schedule, which took effect in Crawley on 17th August 2016. There are also a number of exemptions and reliefs, including affordable housing and self-build housing. <https://www.gov.uk/guidance/community-infrastructure-levy#relief-and-exemptions>
- 4.4. The CIL Regulations 2010 as amended, part 7 state that 15% of the total CIL contributions collected are to be allocated for spending in agreement with local communities – the Neighbourhood Improvement Strand. The remaining 85% of CIL contributions is for the Strategic Infrastructure Strand and must by law (excepting the 5% for administration) be spent on infrastructure to support the development of the area and strictly in accordance with the need to accommodate the population and employment growth trajectories set out in the Crawley Local Plan.
- 4.5. In February 2018, Cabinet approved CIL strategic infrastructure spend priorities for the CIL funding programme 2018/19 to 2021/22, as presented in the Infrastructure Business Plan report [PES/264](#) refers.
- 4.6. The Cabinet also approved the governance of the Strategic Infrastructure Strand (see appendix A) and noted that the Infrastructure Business Plan, including the funding programme, would be reviewed on an annual basis to consider any changes in strategic infrastructure priorities and fluctuations in CIL receipts compared to the forecast.
- 4.7. In February 2019, Cabinet approved the proposed CIL strategic infrastructure spend priorities in the Infrastructure Business Plan and funding programme for the period 2019/20 to 2021/22 – report [PES/302](#) refers.
- 4.8. In March 2020, Cabinet approved the proposed CIL strategic infrastructure spend priorities in the Infrastructure Business Plan and funding programme for the period 2020/21 to 2022/23 – report [PES/335](#) refers.
- 4.9. In March 2021, Cabinet approved the proposed CIL strategic infrastructure spend priorities in the Infrastructure Business Plan and funding programme for the period 2020/21 to 2024/25 – report [PES/370](#) refers.
- 4.10. In March 2022, Cabinet approved the proposed CIL strategic infrastructure spend priorities in the Infrastructure Business Plan and the funding programme for the period 2021/22 to 2024/25 – report [PES/388](#) refers.
- 4.11. In subsequent years since then the focus of the Community Infrastructure Levy annual review has been the Neighbourhood Improvement Strand with further reports presented to Cabinet on that in November 2022 and January 2024 when Cabinet approved amendments to the allocation and governance of Neighbourhood Improvement Strand monies.

## **5. Community Infrastructure Levy (CIL) – Current Financial Position.**

- 5.1. The total CIL received as of Sept 2024: £5,261,346.42 which must be split between the Strategic Strand (85%) and the Neighbourhood Improvement Strand (15%). The table below provides a more detailed breakdown:

# Agenda Item 8

Section 5, Table 1.

	<b>Strategic Infrastructure Strand</b>	<b>Neighbourhood Improvement Strand</b>	<b>Combined CIL Contributions</b>
CIL Contributions Received Prior to 2024/25	£3,942,813.51	£673,075.50	<b>£4,615,889.01</b>
CIL Contributions Received to date in 2024/25	£555,379.05	£90,078.36	<b>£645,457.41</b>
<b>Total CIL Contributions Received to Date</b>	<b>£4,498,192.56</b>	<b>£763,153.86</b>	<b>£5,261,346.42</b>
Pre 2024/25 Admin Charge (5%)	<b>-£239,697.12</b>	£0.00	<b>-£239,697.12</b>
Admin Charge (5% Total CIL Received 2024/25)	<b>-£32,272.87</b>	£0.00	<b>-£32,272.87</b>
Projects Funded Through Neighbourhood Improvement Strand	£0.00	<b>-£104,795.00</b>	<b>-£104,795.00</b>
Ringfenced for Neighbourhood Improvement Fund to March 2025	£0.00	<b>-£20,600.00</b>	<b>-£20,600.00</b>
Neighbourhood Improvement Strand Ringfenced for Three Bridges Football Club	£0.00	<b>-£25,000.00</b>	<b>-£25,000.00</b>
Neighbourhood Improvement Strand ringfenced for Unsupervised Play Programme	£0.00	<b>-£409,000.00</b>	<b>-£409,000.00</b>
Neighbourhood Improvement Strand to be ringfenced for Unsupervised Play Programme		<b>-£203,758.86</b>	<b>-£203,758.86</b>
<b>Balance Available</b>	<b>£4,226,222.57</b>	<b>£0.00</b>	<b>£4,226,222.57</b>

- 5.2. In addition to the above received to date, the total amount of CIL, that remains to be paid to the Council by site developers, for payment under demand notices issued by the council is £142,440. If payment is not forthcoming, then CIL regulations provide the Council with further powers to seek and obtain the money owed.
- 5.3. The Council, as collecting authority, after issuing a reminder notice to the party liable for the levy, can then apply to a Magistrates Court to make a liability order, and this option remains available for six years from the point of the CIL falling due.
- 5.4. Predicting when we will receive CIL receipts continues to be difficult. In previous years developments have been delayed due to the COVID-19 crisis and they continue to be delayed due to the issue of Water Neutrality. In addition, although schemes may secure planning permission with the expectation of having to pay CIL, they can, subsequently, change the tenure type mix to 100% affordable housing, which is eligible for complete exemption from CIL. To date, residential schemes that have subsequently converted to 100% affordable housing provision have brought about a circa £2.5m reduction in anticipated CIL payments to the Council.

## 6. CIL Income Forecasts to 2039/40

- 6.1. CIL income forecasts in Crawley are based upon residential growth trajectories included within the new Crawley Borough Council Local Plan 2023-2040. The income is to be received by the Council once residential developments have commenced, subject to planning permission.
- 6.2. The Crawley Borough Council Local Plan 2023 to 2040 makes provision for the development of a minimum of 5330 net dwellings in the borough for the period 2023/24 to 2039/40. This minimum requirement is to be broken down into an annual

# Agenda Item 8

average requirement on a stepped basis (see below table). Using the average amount of CIL generated per unit as £4,654.401, and taking account those developments already permitted, it is therefore anticipated that the overall CIL contributions to the Council by 2039/40 could amount to a total of over £24m (incl. CIL received to date and outstanding). This is presented and broken down in the table below.

Section 6, Table 2.

Years	Projected Units	CIL	NIS	Admin	Strategic
Received	N/A	£5,261,346	£763,154	£271,970	£4,226,223
Outstanding	N/A	£142,440	£11,089	£7,122	£124,229
1-10 (2023/24-2032/33)	2593	£12,068,859	£1,810,329	£603,443	£9,655,087
11-17 (2033/34-2039/40)	1470	£6,841,968	£1,026,295	£342,098	£5,473,574
		<b>£24,314,613</b>	<b>£3,610,867</b>	<b>£1,224,633</b>	<b>£19,479,113</b>

- 6.3. It should be noted that the exact figure collected from CIL will be unknown until potential developments are under construction - therefore the Council can only provide a forecast which predicts the levels to be collected based upon the Borough housing land supply residential development figures within the Crawley Local Plan 2023 - 2040.

## 7. Considerations regarding CIL Spend – Strategic Infrastructure Strand

- 7.1. Up to 85% of CIL receipts are allocated to the Strategic Infrastructure Strand, which is legally required to be spent on infrastructure in accordance with the Crawley Local Plan 2023-2040 to support Crawley’s growth.
- 7.2. The CIL Strategic Infrastructure Strand is to provide a mechanism whereby development can contribute financially towards the cost of infrastructure that addresses the cumulative impact of Crawley’s growth. Unlike financial contributions secured via S106 agreements CIL charges are not subject to legal tests requiring them to be directly linked to a corresponding site development. Unlike Section 106, CIL contributions are not necessary to make a development acceptable in planning terms, and there is, as a consequence, greater discretion regarding which infrastructure CIL monies can be used to fund, provided it correlates with infrastructure priorities identified in the Crawley Local Plan 2023-2040 to facilitate growth trajectories.
- 7.3. In CIL charging areas such as Crawley most forms of S106 contributions towards offsite infrastructure, including highways improvements, education facilities, libraries and fire and rescue services have been discontinued. If CIL funds are not directed towards these forms of infrastructure there is a risk that the impacts of development will not be appropriately mitigated. In order to avoid this risk councils are expected to align their CIL spending programmes with evidence of infrastructure need identified and established through an Infrastructure Delivery Schedule (Appendix B) drawn up as part the Local Plan process.

<sup>1</sup> The £4,654.40 average figure is past trends, representing the amount of CIL triggered by residential-led schemes since the adoption of CIL in 2016, divided by the number of new dwellings within commenced schemes granted planning permission or prior approval over the same period.

# Agenda Item 8

- 7.4. Accordingly, the proposed CIL spend priorities for strategic infrastructure are based upon Crawley's Infrastructure Delivery Schedule (IDS), which has been prepared as part of the Public examination of the Local Plan strategy.
- 7.5. The IDS comprises an assessment of the infrastructure required to support growth in the Borough in accordance with the Crawley Local Plan 2023-2040 and each infrastructure scheme is prioritised depending on whether the infrastructure is considered to be critical, essential or desirable to Crawley's growth. The IDS also provides summary evidence of the feasibility and deliverability of each infrastructure scheme listed as required to support Local Plan growth.
- 7.6. The 2023-2040 Crawley Local Plan version of the IDS is provided in appendix B. This version supersedes earlier versions of the IDS which were prepared in order to provide justification for the introduction of CIL, and to provide a basis for earlier phases of the Infrastructure Business Plan.
- 7.7. In 2017 Cabinet endorsed that CIL resources be concentrated as a priority on the schemes identified in the IDS as being Critical to enabling growth in addition to those essential schemes, which score the highest against the endorsed assessment criteria, report [PES/257](#) refers.

## **8. CIL Strategic Infrastructure Strand – Proposed Priority Schemes 2025-2029**

- 8.1. To date the Council has received £4,498,192.56 of Strategic CIL monies and from 2018 to 2023 has allocated £239,697.12 of these monies to administration costs.
- 8.2. A further £32,272.87 will be allocated to administration costs incurred through 2024/25, which equates to 5% of the total funds collected in 2024/25 and is in line with current CIL regulations – see section 8.
- 8.3. The balance of Strategic Infrastructure Strand CIL monies available after deducting the above admin charges is £4,226,222.57.
- 8.4. It is recommended that the above sum includes a continuing commitment to providing CIL funding allocations to the following priority projects identified in the 2019/20 Infrastructure Business Plan (IBP), last approved by Cabinet March 2022:
  - Three Bridges Railway Station Improvement project.
  - A23/ Manor Royal junction project.
  - A2011 Crawley Avenue / A2004 Northgate Avenue improvements
- 8.5. It is recommended that the following two projects are removed from the list of priority project since they no longer appear to be recognised by the NHS as priority schemes.
  - Saxonbrook Medical Centre, Northgate - Creating 2 additional consulting rooms (subject to confirmation from the NHS that this is still required).
  - Pound Hill Medical Group - build 2 additional consulting rooms. (subject to confirmation from the NHS that this is still required).
- 8.6. Colleagues at NHS Sussex are being invited to review their infrastructure priorities and come forward with alternative scheme proposals which may be eligible to receive CIL Strategic Infrastructure Strand funding support.



# Agenda Item 8

- 8.7 Cabinet originally agreed that £1.1m of CIL Strategic Infrastructure Strand monies be ringfenced for the Three Bridges Railway Station Improvement project. However, following a project budget review, taking account of the impact of the ongoing Station Change process with the railway authorities, there is an additional CIL funding requirement for the project of £950,000.
- 8.8 It is therefore proposed to seek Cabinet approval to increase the ringfenced CIL contribution to this project by £950,000 from £1,050,000 to £2,050,000.
- 8.9 It is therefore proposed that a total of £2,842,000 of available CIL Strategic Infrastructure Strand monies are ringfenced for the following funding programme of priority infrastructure projects to the end of March 2029:

	<b>£m</b>
A2011 Crawley Avenue/ A2004 Northgate Avenue improvements.	£ 0.360
A23 / Manor Royal junction project	£ 0.432
Three Bridges Railway Station Improvement project	£ 2.050
	<b>£ 2.842</b>

- 8.10 It is further proposed to formally commit £0.432m to the A23/ Manor Royal junction project since delivery of this scheme, led by West Sussex County Council, is confirmed as part of the Crawley Growth Programme.
- 8.11 The above funding programme will be reviewed on an annual basis. In the event that new priorities are identified or existing priorities need to be altered, the programme will be revised. All projects will be progressed in accordance with the agreed governance procedure (2.3).

## 9. Future Allocations of the CIL Strategic Infrastructure Strand

- 9.1. Over the period of the new Local Plan to 2040, Crawley Borough Council anticipates receiving a further £15m in CIL receipts for allocation within the Strategic Infrastructure Strand. In accordance with the new Local Plan, these funds should be reserved to those projects identified through the Infrastructure Delivery Schedule (Appendix B) and approval will be sought at a later stage to formally allocate Strategic CIL contributions on a project-by project-basis once the details of each individual project have been finalised.
- 9.2. It is therefore intended in the future for proposals to come forward for consideration by Cabinet for the following projects to be included on the list of priority schemes to have CIL Strategic Infrastructure Strand monies ringfenced for them in anticipation of their subsequent delivery (estimated costs provided below, to be confirmed closer to the time):

<b>Medium Term Delivery – 2029/30 to 2033/34</b>	<b>£m</b>
A23 Crawley Avenue/ Ifield Avenue Roundabout improvements	£ 0.488
M23 Junction 11 Northbound Diverge and Merge	£ 3.647
<b>Medium to Long Term Delivery – 2029/30 to 2039/40</b>	
A contribution to Education, Early Years Provision Locations to be determined through WSCC in addition to dependencies /site availability	£ 2.000
<b>Longer Term 2033/34 to 2039/40</b>	
M23 Junction 10 Southbound Merge	£ 1.430
	<b>£ 7.565</b>

# Agenda Item 8

- 9.3. The revised Infrastructure Delivery Schedule (Appendix B) has also identified the following projects for consideration to receive a contribution from CIL in the future. Proposals associated with these projects will be brought forward in the future, for Cabinet to consider adding them to the CIL funding programme and there will be future confirmation of the CIL contribution required as more information is received:

<b>Short Term Delivery – 2024/25 to 2028/29</b>	<b>£m</b>
Tushmore Junction improvements	£ 1.380
<b>Medium Term Delivery - 2029/30 to 2033/34.</b>	
Local Cycling and Walking Infrastructure <sup>2</sup> Plan Route A – Gatwick Airport to Manor Royal <sup>3</sup>	£ 4.560
Local Cycling and Walking Infrastructure route: B – Pound Hill to Manor Royal via Forge Wood	£ 1.095
<b>Medium to Long Term Delivery – 2029/30 to 2039/40</b>	
Special Educational Needs provision (approx.. 14 places)	£ 1.400
	<b>£ 8.435</b>

## 10. CIL Strategic Infrastructure Strand - Staffing Implications

- 10.1. It was previously agreed from 2019/20 onwards to apply the 5% of CIL collected in any financial year to the administrative expenses incurred by the Council in carrying out its role collecting, managing, and distributing CIL.
- 10.2. Officers are currently in the process of recruiting a CIL Enforcement Officer and aim to have the post recruited in the coming year. This role will be funded entirely from the 5% of CIL monies collected each financial year to pay for administrative expenses. The impact of CIL on staffing and resources will continue to be assessed at each annual review of CIL.

## 11. CIL Neighbourhood Improvement Strand- Update

- 11.1. CIL regulations state that 15% of the total CIL contributions collected are to be allocated for spending in agreement with local communities where development is taking place. To date the Council have received a total of £763,153.86 in CIL funds for the Neighbourhood Improvement Strand (NIS).
- 11.2. To date the council has spent £104,795.00 of NIS contributions on projects including a contribution to a 3G pitch at Three Bridges FC, leaving a balance of £658,358.86.

### Neighbourhood Improvement Fund

- 11.3. In November 2022, Cabinet approved the implementation of a new “hybrid” model for the Neighbourhood Improvement Strand (NIS), which retained £75,000 from the CIL NIS, to maintain the Neighbourhood Improvement Fund with an annual contribution of £25,000, from the CIL NIS, until March 2025. Any remaining NIS contributions not committed to the Neighbourhood Improvement Fund were to be

---

<sup>2</sup> National Highways have agreed our Local Plan Transport Study and approach because we have committed to delivering significant sustainable transport improvements, including delivery of Local Cycling and Walking Infrastructure schemes.

<sup>3</sup> There is the potential for additional funding from sustainable transport contributions implemented through the Local Plan collected from Gatwick DCO s106 (if approved) and Gatwick Green Development.

# Agenda Item 8

used as a contribution to the delivery of a programme of neighbourhood improvement works identified as a priority by Crawley Borough Council.

- 11.4. To date there has been one application to the Neighbourhood Improvement Fund since 2022 and there remains a further £20,600 reserved to the NIF until March 2025.
- 11.5. It is therefore proposed that any unspent Neighbourhood Improvement Funds at the end of March 2025 be reallocated to enable the ongoing delivery of the Council's Unsupervised Play Improvement programme.

## Other Neighbourhood Improvement Strand Funded Schemes

- 11.6. Using the Infrastructure Delivery Schedule, the following neighbourhood improvement works have been identified as a priority by Crawley Borough Council and the public have been consulted as to their inclusion in a funding programme utilising the Neighbourhood Improvement Strand.
- Unsupervised Play Investment Programme (UPIP) 2024/25 to 2039/40.
  - 3G pitch at Three Bridges.
  - Programme to improve drainage on playing fields and football pitches, see 11.8.
- 11.7. To date Cabinet has approved the allocation of CIL Neighbourhood Improvement Strand monies to the following schemes:

<b>Short Term Delivery – 2024/25 to 2028/29</b>	<b>£m</b>
Unsupervised Play Investment Programme (UPIP) 2024/25 to 2027/28	£ 0.409
3G pitch at Three Bridges (total allocation £0.1m of which £0.075m has been spent to date).	£ 0.025
	<b>£ 0.434</b>

- 11.8. It should be noted that the current programme to improve drainage on playing fields is now fully funded utilising existing S106 receipts and additional funding has been secured from the Football Foundation to purchase the specialist drainage equipment required. In the future, there may be the need to revisit this.

## 12. Future Proposals - Allocations of CIL Neighbourhood Improvement Strand

- 12.1. By March 2040 it is anticipated that the council will have received a further £2.848m of CIL receipts in contributions to the CIL Neighbourhood Improvement Strand. (Section 6, table 2).
- 12.2. Additional funds are required to deliver the Unsupervised Play Investment Programme (UPIP) 2024/25 to 2039/40. It is proposed that further funds be allocated to the UPIP as funds become available from incoming CIL receipts and details of individual projects within the wider programme are finalised. The table below illustrates the additional funding required.

# Agenda Item 8

<b>Short Term Delivery- 2024/25 to 2028</b>	<b>£m</b>
Additional contribution to Unsupervised Play Investment Programme 2023/24 to 2027/28 (£0.170 of this has already been received). <sup>4</sup>	£ 0.55
<b>Medium Term Delivery – 2029/30 to 2033/34</b>	
Continuation of Unsupervised Play Investment Programme (UPIP) 2029/30 to 2033/34- £0.970m <sup>5</sup>	£ 0.97
<b>Long Term Delivery – 2034/35 to 2039/40</b>	
Further Unsupervised Play Investment Programme (UPIP) 2034/35 to 2039/40 <sup>6</sup>	£ 0.33
	<b>£ 1.85</b>

12.3. To receive a contribution from the Neighbourhood improvement Strand, projects should:

- Be listed in Crawley’s Infrastructure Delivery Schedule (IDS) (Appendix B), which identifies infrastructure required as a result of the growth forecasts indicated in the Local Plan.
- Be identified in the IDS as being Critical/ essential or high scoring desirable scheme, when assessed against the agreed criteria.
- Be delivered at a neighbourhood level, i.e., projects where the impact is most likely to be felt within one neighbourhood.

12.4. The revised IDS has identified the following projects for consideration also to receive a contribution from CIL and to be added to the Neighbourhood Improvement Strand funding programme in the future as more information is received:

<b>Medium Term Delivery – 2029/30 to 2033/34</b>	
Additional Allotment Provision - £0.05m	£ 0.05
<b>Long Term Delivery – 2034/35 to 2039/40</b>	
Provision of 1 further synthetic Turf Pitch - £0.9m	£ 0.90
	<b>£ 0.95</b>

12.5. In accordance with CIL guidance, officers propose to undertake a public consultation exercise to obtain feedback on the proposed future allocations from the CIL Neighbourhood Improvement Strand listed above and to ensure there is sufficient support for the proposed expansion of projects to be included. Subject to the outcome of this public consultation, proposals for CIL Neighbourhood Improvement Strand monies to be allocated to the above projects will be presented to Cabinet at a future meeting for their consideration.

## 13. Financial Implications

13.1. There continues to be a risk that the spend profiles of projects identified as a priority in the Infrastructure Business Plan will be mismatched against the receipts of CIL contributions, particularly if there are delays and shortfalls with the expected receipt of CIL monies by the Council from developments.

13.2. Councils are unable to borrow against anticipated levy income, but CIL receipts can be used to repay expenditure retrospectively on infrastructure that has already been incurred, provided that expenditure is in line with recognised priority infrastructure schemes as identified within the CIL Infrastructure Business Plan. (IBP).

<sup>4</sup> Figures based on historic costs a review of the programme costs will be undertaken closer to the intended investment period.

<sup>5</sup> Figures based on historic costs a review of the programme costs will be undertaken closer to the intended investment period.

<sup>6</sup> Figures based on historic costs a review of the programme costs will be undertaken closer to the intended investment period.

# Agenda Item 8

- 13.3. In the event that not enough CIL contributions are received to bring forward all projects outlined then projects will be progressed in order of priority identified in the IBP (Appendix C, 2.1) in accordance with the agreed governance procedure (Appendix C, 2.3).

## 14. Legal Implications

- 14.1. The legislation governing the development, adoption, and administration of a Community Infrastructure Levy (CIL) is contained within the Planning Act (2008) and the Community Infrastructure Levy Regulations 2010 (as amended). CIL charging took effect in Crawley following due process on 17th August 2016.
- 14.2. CIL regulations state that 15% of the total CIL contributions collected are to be allocated for spending in agreement with local neighbourhoods where development is taking place – the Neighbourhood Improvement Strand. The CIL Regulations do not prescribe a specific process for how the neighbourhood improvement strand should be spent, other than to state that it must be spent on something that is ‘concerned with addressing the demands that development places on an area..’
- 14.3. A charging authority may apply CIL to administrative expenses incurred by it in connection with CIL. This is providing that it does not exceed 5% of CIL collected.
- 14.4. Where an authority spends less than its permitted allowance on administrative expenses, it must transfer the remaining allowance for use on capital infrastructure projects as part of the Strategic Infrastructure Strand. If Crawley BC does not apply the discretionary administrative expenses, then a maximum of 85% of CIL collected in Crawley will be spent on strategic infrastructure.
- 14.5. The levy should not be used to remedy pre-existing deficiencies in infrastructure provision unless the deficiencies are exacerbated by new development.

## 15. Equalities Implications

The Council must have due regard to its obligations under the Equality Act 2010 and for the public sector equality duty (“PSED”) under section 149 of the Equality Act 2010 in making its decisions and carrying out its functions. The equalities impact and/or the PSED will be addressed as and when CIL funded proposals are developed.

## 16. Background Papers

Report to Cabinet 31 January 2024 PES/426 [Allocating Monies Collected Through CIL.pdf\(crawley.gov.uk\)](#)

Report to Cabinet 2 November 2022 PES/420 [Allocating Monies Collected Through CIL, Neighbourhood](#)

Report to Cabinet 16 March 2022 PES/388 [Allocating Monies Collected Through Community Infrastructure Levy 2022/23](#)

Report to Cabinet 10 March 2021 PES/370 - [Annual Community Infrastructure Levy \(CIL\) Statement](#)

# Agenda Item 8

West Sussex County Council - [see Item 6 WSCC Revenue Budget 2021/22, Capital Strategy 2021/22 to 2025/26](#) and [WSCC Cabinet Printed Decision](#).

Report to Cabinet 11 March 2020 PES/335 - [Allocating Monies Collected the Through Community Infrastructure Levy – Infrastructure Business Plan 2020/21](#)

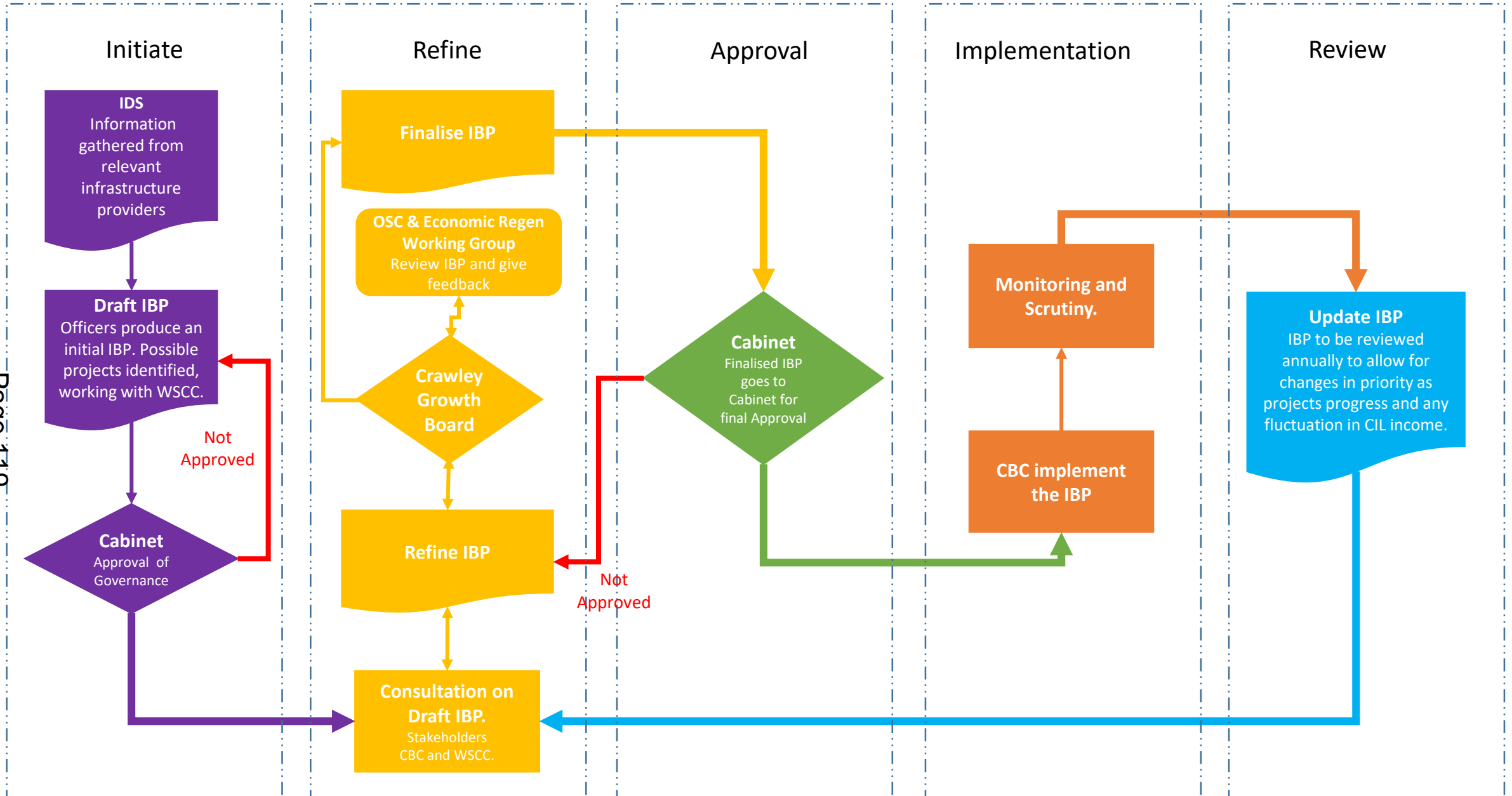
Report to Cabinet 6 February 2019 PES/302 - [Allocating Monies Collected Through Community Infrastructure Levy 2019/20](#)

Report to Cabinet 7 February 2018 PES/264 - [Allocating Monies Collected Through Community Infrastructure Levy - Infrastructure Business Plan and Governance](#).

Report to Cabinet 4 October 2017 PES/257 – [Community Infrastructure Levy - Governance, Prioritisation and Spend Proposals](#).

Report to Cabinet 29 June 2016 SHAP/54 - [Adoption of Crawley Community Infrastructure Levy \(CIL\)](#)

Contact Officer: Clem Smith, Head of Economy and Planning



This page is intentionally left blank



## Appendix B - Infrastructure Delivery Schedule (IDS)

The Infrastructure Delivery Schedule forms an important part of the evidence base for implementing the Community Infrastructure Levy (CIL). The purpose of the IDS is to demonstrate that a funding gap exists. To identify a funding gap, the council must identify the total cost of infrastructure it wished to fund in whole or in part from CIL.

This document builds upon the information set out in the Crawley Infrastructure Plan and includes the details of the infrastructure requirements identified by both the council and other service providers. The council have worked with a variety of infrastructure providers to determine known and expected costs of infrastructure as well as other sources of funding which may be available.

The following tables set out the key types of additional infrastructure that are considered necessary to support development set out in the Local Plan. Each Scheme has been categorised as either critical, essential or desirable relative necessity of the project to the delivery of the Local Plan strategy.

**Critical** - Specific infrastructure projects which are required to be delivered in order to enable the implementation of individual developments identified in the Local Plan, or the Local Plan strategy as a whole.

**Essential** - Infrastructure which is required in order to mitigate the development identified in the Local Plan, but where there is greater flexibility regarding the scope or timing of the project, or where there is potential for the projects to be substituted by alternatives.

**Desirable** - Infrastructure projects that are not required as part of the Local Plan mitigation strategy (unless substituted in place of relevant 'essential' projects) but which would contribute to additional regeneration / place-making / environmental objectives, and maintain the functionality of existing facilities for the longer-term, in support of the Local Plan vision

The schemes have been assigned a colour denoting:

Blue - Project is considered eligible to receive a contribution from CIL Strategic Strand

White - Project is considered eligible to receive a contribution from CIL Neighbourhood Improvement Strand

Orange - Contribution from S106.

Green - Funded by another Organisation.

Yellow - Funded by a Planning Condition.

Pink – TBC.

Scheme	Infrastructure Type	Neighbourhood	Reason for Improvement	Critical/ Essential/ Desirable	Forms Part of Crawley Growth Deal?	Phasing From	Approx Cost (£)	Extra information	Funding Sources Available	Potential Funding Gap	Potential Funding from Strategic CIL, as per IBP	Lead Organisation	Score out of 400	Criteria Met
011/A2004/ Hazelwick Av. / Gatwick Rd. junction improvement	Transport - Highway Improvement	Northgate & West Green	Project for mitigation of transport impact of overall Local Plan strategy. Junction requires mitigation.  Scheme is located within an Air Quality Management Area.  Scheme is located within an Air Quality Management Area.	Critical	No	Short Term	£ 2,807,000.00	Part of Reference case for 2022 Crawley Transport Study	WSSC, DFT, Funds currently administered by LEP & Developer Contributions	£ 1,247,000.00	£ 360,000.00	WSSC, CBC, DFT & LEP	390	ABCGHIJKL
A23 Crawley Avenue/ Ifield Avenue roundabout	Transport - Highway Improvement	Northgate & West Green	Project for mitigation of transport impact of overall Local Plan strategy. Junction requires mitigation.  Crawley Transport Study 2022	Critical	No	Medium Term	£ 743,308.00		WSSC, DFT, Funds currently administered by LEP & Developer Contributions	£ 488,308.00	£ 488,308.00	WSSC, CBC, DFT & LEP	390	ABCGHIJKL
A23 London Road/ Manor Royal	Transport - Highway Improvement	Northgate & West Green	Project for mitigation of transport impact of overall Local Plan strategy. Junction requires mitigation.	Critical	Yes	Short Term	£ 432,000.00		WSSC, DFT, Funds currently administered by LEP & Developer Contributions	£ 432,000.00	£ 432,000.00	WSSC, CBC, DFT & LEP	375	ABCFIJKL

Scheme	Infrastructure Type	Neighbourhood	Reason for Improvement	Critical/ Essential/ Desirable	Forms Part of Crawley Growth Deal?	Phasing From	Approx Cost (£)	Extra information	Funding Sources Available	Potential Funding Gap	Potential Funding from Strategic CIL, as per IBP	Lead Organisation	Score out of 400	Criteria Met
A2011/A23/London Road "Tushmore junction".	Transport - Highway Improvement	Langley Green & Tushmore	Project for mitigation of transport impact of overall Local Plan strategy. WSCC feasibility study has identified an enhanced scheme for Tushmore roundabout.	Critical	No	Short Term	£ 2,190,000.00	Part of Reference case for 2022 Crawley Transport Study. Scheme design should be coordinated with design of A2011/A23/London Road 'Tushmore Junction' highways scheme and the design of section N-02a of LCWIP Route: N - Lowfield Heath to Town Centre.	WSCC & Developer contributions	£ 1,823,000.00	£ 1,380,000.00	WSCC	370	ABCGHJKL
M23 Junction 10 Southbound Merge	Transport - Highway Improvement	Pound Hill North & Forge Wood	Project for mitigation of transport impact of overall Local Plan strategy. (CBC Local Plan Transport Strategy 2022)	Critical	No	Longer Term	£ 1,430,201.00	0	Developer contributions	£ 1,430,201.00	£ 1,430,201.00	CBC	365	ABCGIJKL
M23 Junction 11 Northbound Diverge and Merge	Transport - Highway Improvement	Pound Hill North & Forge Wood	Project for mitigation of transport impact of overall Local Plan strategy. (CBC Local Plan Transport Strategy 2022)	Critical	No	Medium Term	£ 3,646,620.00	0	Developer contributions	£ 3,646,620.00	£ 3,646,620.00	CBC	365	ABCGIJKL
New early years provision: approx. 252 places, location to be determined	Education	Borough Wide	New early years provision, location to be determined	Critical	No	Medium to Long Term	£ 5,040,000.00	0	Developer Contributions, WSCC	£ 5,040,000.00	£ 2,000,000.00	WSCC	345	ABCGJKL
SEND Education provision - approx 14 places	Education	Borough Wide	Needed to support demand arising from projected development	Critical	No	Medium Term to Long Term	£ 1,400,000.00	0	Developer Contributions & WSCC	£ 1,400,000.00	£ 1,400,000.00	WSCC	345	ABCGJKL
Additional 4 forms of entry at Secondary School level, to be provided within Crawley or as close to the borough as possible	Education	Borough Wide	Current Schools nearing capacity Planning for School Places 2023	Critical	No	Short Term	TBC	0	Developer contributions and WSCC (incl Basic Need Grant)		£ -	WSCC	335	ABCGJKL
Forge Wood Youth Provision	Education	Pound Hill North & Forge Wood	Neighbourhood development Forge Wood	Critical	No	Short Term	£ 700,000.00	0	Planning condition requiring provision of youth facility/ To be provided within community centre alongside early years provision referred to below.	£ -	£ -	CBC & Developer	185	CGHIJL

Scheme	Infrastructure Type	Neighbourhood	Reason for Improvement	Critical/ Essential/ Desirable	Forms Part of Crawley Growth Deal?	Phasing From	Approx Cost (£)	Extra information	Funding Sources Available	Potential Funding Gap	Potential Funding from Strategic CIL, as per IBP	Lead Organisation	Score out of 400	Criteria Met
Forge Wood Early Years provision	Education	Pound Hill North & Forge Wood	Neighbourhood development Forge Wood	Critical	No	Short Term	£ 700,000.00	0	Planning condition requiring provision of children's centre/play centre. To be provided within community centre alongside youth provision referred to above.	£ -	£ -	CBC & Developer	185	CGHIJL
Upgrades to Crawley Waste Water Treatment Works	Waste Water Infrastructure	Pound Hill North & Forge Wood	May be needed to accommodate housing and employment growth proposed in Local Plan	Critical	No	Short Term	TBC	Extent of upgrades required is TBC	Thames Water Business Plan		£ -	Thames Water	160	CGIJL
B2036 Balcombe Road / C206 Radford Road – signalisation for NE Sector - Committed scheme	Transport - Highway Improvement'	Pound Hill North & Forge Wood	Developer-led scheme critical for mitigation of Forge Wood development. Crawley Transport Study 2022	Critical	No	Medium Term	TBC	Part of Reference case for 2022 Crawley Transport Study	Planning Condition Developer Funded		£ -	Developer	155	CGIJ
C206 Radford Road – signalised shuttle arrangement at railway bridge for NE Sector	Transport - Highway Improvement'	Pound Hill North & Forge Wood	Developer-led scheme critical for mitigation of Forge Wood development. Crawley Transport Study 2022	Critical	No	Short Term	TBC	Committed scheme Part of Reference case for 2022 Crawley Transport Study	Planning Condition Developer Funded		£ -	Developer	155	CGIJ
Watwick Road / C206 Radford Road – roundabout capacity improvement for NE Sector.	Transport - Highway Improvement'	Pound Hill North & Forge Wood	Developer-led scheme critical for mitigation of Forge Wood development. Crawley Transport Study 2022	Critical	No	Short Term	TBC	Committed scheme Part of Reference case for 2022 Crawley Transport Study	Planning Condition Developer Funded		£ -	Developer	155	CGIJ
New junction on B2036 Balcombe Road – to access NE Sector development.	Transport - Highway Improvement'	Pound Hill North & Forge Wood	Developer-led scheme critical for mitigation of Forge Wood development. Crawley Transport Study 2022	Critical	No	Medium Term	TBC	Committed scheme Part of Reference case for 2022 Crawley Transport Study	Planning Condition Developer Funded		£ -	Developer	155	CGIJ
New link road joining A2011 Crawley Avenue with B2036 Balcombe Road (north)– to access North East Sector development.	Transport - Highway Improvement'	Pound Hill North & Forge Wood	Developer-led scheme critical for mitigation of Forge Wood development. Crawley Transport Study 2022	Critical	No	Short Term	TBC	Committed scheme Part of Reference case for 2022 Crawley Transport Study	Planning Condition Developer Funded		£ -	Developer	155	CGIJ

Scheme	Infrastructure Type	Neighbourhood	Reason for Improvement	Critical/ Essential/ Desirable	Forms Part of Crawley Growth Deal?	Phasing From	Approx Cost (£)	Extra information	Funding Sources Available	Potential Funding Gap	Potential Funding from Strategic CIL, as per IBP	Lead Organisation	Score out of 400	Criteria Met
Bus routes connecting Town Centre, Three Bridges, Forge Wood and Gatwick – Route amended.	Transport - Bus	Borough Wide	Crawley Transport Study 2022	Critical	No	Short Term	TBC		Developer Funded		£ -	Developer	140	CGJL
M23 Junction 10 roundabout – signalisation to accommodate North East Sector development.	Transport - Highway Improvement'	Borough Wide	Developer-led scheme critical for mitigation of Forge Wood development. Crawley Transport Study 2022	Critical	No	Short Term	TBC	Committed scheme	Planning Condition Developer Funded		£ -	Developer	140	CGJL
B2036 Balcombe Road / B2037 Antlands Lane – roundabout capacity improvement for NE Sector; Committed scheme	Transport - Highway Improvement'	Pound Hill North & Forge Wood	Developer-led scheme critical for mitigation of Forge Wood development. Crawley Transport Study 2022	Critical	No	Medium Term	TBC	Part of Reference case for 2022 Crawley Transport Study	Planning Condition Developer Funded		£ -	Developer	135	CGJ
Improvement to Three Bridges Railway Station	Transport - Highway / Transport improvements	Three Bridges	To improve safety and access to the station for buses, cyclists, taxis, pedestrians and cars.'	Essential	Yes	Short Term	£ 7,500,000.00		S106 obligations:- £500,000 (Network Rail and other S106), WSCC, Funds currently administered by LEP	£ 3,514,000.00	£ 2,050,000.00	CBC, Network Rail, LEP and WSCC'	375	ABDFHIJKL
Station Gateway Phase 1	Transport - Highway/Public Transport and Active Travel Infrastructure; User Experience and Interchange Facility; Public Realm/Place making Improvements	Three Bridges	Crawley Bus Station adjacent to the rail station is poorly laid out in terms of (1) facilities for bus users, (2) Active travel needs and (3) intermodal connectivity. Opportunity for improving bus segregation and speed of movement through the station site.	Essential	Yes	Short Term	£ 7,400,000.00	£3m to £5m	WSCC, Funds currently administered by LEP, Towns Fund & Developer Contributions	£ -	£ -	WSCC, CBC, DFT & LEP'	365	ABDFHIJL
LCWIP route A – Gatwick Airport to Manor Royal	Transport - Highway Improvement (Cycling and Walking)	Northgate & West Green	Crawley LCWIP 2021.	Essential	No	Medium Term	£ 4,560,000.00	Full costs to be established, estimated at £4m	Dft, GAL & Developer contributions	£ 4,560,000.00	£ 4,560,000.00	CBC & Developers	340	ABDGIJK
LCWIP route: B – Pound Hill to Manor Royal via Forge Wood	Transport - Highway Improvement (Cycling and Walking)	Pound Hill North & Forge Wood	Crawley LCWIP 2021	Essential	No	Medium Term	£ 1,095,000.00	Full costs to be established, estimated between £0.28m to £2.05m	DFT & Developer Contributions	£ 1,095,000.00	£ 1,095,000.00	CBC	340	ABDGIJK
Pound Hill Medical Group - build 2 additional consulting rooms	Healthcare	Pound Hill	Consistent annual growth in patients and this is likely to be enhanced with those registering from the Forge Wood development. Practice is currently unable to accept any more new patients	Essential	No	Short Term	£ 144,000.00		Developer Contributions	£ 144,000.00	£ 144,000.00	NHS	340	ABDGIJK
Saxonbrook Medical Centre - Creating 2 additional consulting	Healthcare	Northgate & West Green	Increase in patient number from a number of new and proposed developments. Practice is currently unable to accept any more new patients	Essential	No	Short Term	£ 32,000.00		Developer Contributions	£ 32,000.00	£ 32,000.00	NHS	340	ABDGIJK

Scheme	Infrastructure Type	Neighbourhood	Reason for Improvement	Critical/ Essential/ Desirable	Forms Part of Crawley Growth Deal?	Phasing From	Approx Cost (£)	Extra information	Funding Sources Available	Potential Funding Gap	Potential Funding from Strategic CIL, as per IBP	Lead Organisation	Score out of 400	Criteria Met
Unsupervised Play Investment Programme Provision and improvements to Play Areas (Type A, B & C)	Open Space	Borough Wide	CBC Play Strategy	Essential	No	Short Term to Long Term	£ 2,352,234.00		Developer Contributions	£ 2,257,339.00	£ 2,257,339.00	CBC	340	ABDGHJK
LCWIP route A – Town centre to Manor Royal	Transport - Highway Improvement (Cycling and Walking)	Northgate & West Green	Crawley LCWIP 2021	Essential	No	Medium Term	£ 5,800,000.00	Full costs to be established, estimated at £3m	DfT & Developer Contributions	£ 5,800,000.00	£ 5,800,000.00	CBC	340	ABDGIJKL
Improving drainage on playing fields and football pitches: Locations and Programme to be announced	Open Space	Borough Wide	Current provision waterlogged and poor quality. (Crawley Borough Council Playing Pitch Strategy - Strategy and+F38 Action Plan, 2021)	Essential	No	Short Term to Long Term	£ 125,500.00	Dependent on scope of works - total action plan investment programme likely to cost £250,000+	CBC, Football Foundation, Developer contributions	£ -	£ -	CBC	330	ABDGHJ
K2 Heat Network Phase 3	Decentralised Energy	Tilgate	To provide heat to buildings and residents in District Energy Network priority area	Essential	No	Short Term	£ 250,000.00		CBC Public Sector Partners	£ 250,000.00	£ 250,000.00	CBC	120	DGJK
LCWIP route: N – Lowfield Heath to town centre	Transport - Highway Improvement (Cycling and Walking)	Manor Royal	Crawley LCWIP 2021	Essential	No	Medium Term	£ 9,780,000.00	Full costs to be established, total cost of route N (excluding section N-02a) estimated between £2.72m to £9.78m	DfT & Developer Contributions	£ 9,780,000.00	£ -	CBC	310	ABDGJL
LCWIP route: N – Lowfield Heath to town centre (Section N-02a)	Transport - Highway Improvement (Cycling and Walking)	Langley Green & Tushmore	Crawley LCWIP 2021	Essential	No	Short Term	£ 530,000.00	Full costs to be established, total cost of section N-02a estimated between £430,000 and £530,000. Scheme design should be coordinated with design of 'A2011/A23/London Road "Tushmore junction" highways scheme.	DfT, WSCC & Developer Contributions	£ 530,000.00	£ -	WSCC & CBC	310	ABDGJL
Ifield – Upper Mole Flood Alleviation Scheme (Smaller Scale Scheme)	Flood Defence	(Including Manor Royal)	To alleviate flooding in Ifield	Essential	No	TBC	TBC		CBC, WSCC, Environment Agency and GAL			CBC, WSCC, Environment Agency and GAL	250	ADGHJK
Three Bridges Medical Centre - Loft Conversion	Healthcare	Three Bridges	Further pressure from proposed Tinsley Lane development	Essential	No	Short Term	TBC		Developer Contributions			NHS	240	ADGIJK

Scheme	Infrastructure Type	Neighbourhood	Reason for Improvement	Critical/ Essential/ Desirable	Forms Part of Crawley Growth Deal?	Phasing From	Approx Cost (£)	Extra information	Funding Sources Available	Potential Funding Gap	Potential Funding from Strategic CIL, as per IBP	Lead Organisation	Score out of 400	Criteria Met
Western Boulevard Sustainable Transport Improvements'	Transport - Highways Improvement (Sustainable Travel Project - bus/cycle/walking)	Three Bridges	Improved connectivity for cyclists/pedestrians and facilitation of bus movements.	Essential	Yes	Short Term	£ 1,949,000.00		CBC, WSCC, Funds Currently Administered by LEP	£ 824,000.00	£ -	CBC, WSCC	170	DFHIJL
New playing pitches and play area as part of the new neighbourhood at Forge Wood	Open Space	Pound Hill North & Forge Wood	New Neighbourhood Forge Wood (developer condition)	Essential	No	Short Term	TBC		Planning Condition		£ -	CBC	155	DGHIJ
Manor Royal bus lane (Manor Royal West)	Transport - Highways Improvement (Bus)	Langley Green & Tushmore	Project will improve bus connections along Manor Royal.	Essential	Yes	Short Term	£ 2,670,000.00		DfT	£ -	£ -	CBC, WSCC	145	DFHJ
Manor Royal Heat Network B	Decentralised Energy	Northgate & West Green	To provide heat to buildings and residents in Manor Royal	Essential	No	TBC	£ 7,170,000.00	TBC	Developer Contributions, WSCC, Sussex Energy Saving Partnership and government grants	£ 7,170,000.00	£ -	CBC	130	DGIJ
Manor Royal Heat Network A	Decentralised Energy	Northgate & West Green	To provide heat to buildings and residents in Manor Royal	Essential	No	Short Term	£ 6,400,000.00	TBC	WSCC, MRBID, EU funding - BISEPS (Business clusters Integrated Sustainable Energy Packages) initiative	£ 6,400,000.00	£ -	CBC, MR BID, WSCC	130	DGIJ
Heming Way – bus lane eastbound from Faraday Road to London Road	Transport - Highway Improvement (Bus)	Langley Green & Tushmore	Crawley Transport Study 2022.	Essential	No	Medium Term	TBC		DfT & Developer Contributions		£ -	CBC	115	DGJL
Three Bridges 3G Synthetic Turf Pitch 3G	Open Space	Three Bridges	Crawley Borough Council Playing Pitch Strategy - Strategy and Action Plan, 2021	Desirable	No	2023/24	£ 1,170,000.00	3G Pitch -	CBC & Developer contributions	£ 100,000.00	£ 100,000.00	CBC	330	ABEGHIJ
Additional Allotment Provision	Open Space	Borough Wide	Crawley Open Space, Sport and Recreation Study (2020)	Desirable	No	TBC	£ 80,000.00	TBC	CBC & Developer contributions	£ 50,000.00	£ 50,000.00	CBC	315	ABEGHIJ
Improvements to Crawley Police Station	Emergency Services	Northgate & West Green	Sussex Police Estates Strategy 2018-2022 – Crawley Station in poor condition.	Desirable	No	Short Term	£ 534,000.00		Sussex Police	£ 534,000.00	£ -	Sussex Police, CBC & WSCC	310	ABEGIJL
LCWIP route: C – Pound Hill to town centre via Three Bridges (limited to Crawley boundary)	Transport - Highway Improvement (Cycling and Walking)	Three Bridges	Crawley LCWIP 2021	Desirable	No	Medium Term	£ 5,420,000.00	Full costs to be established, estimated between £2.04m to £5.42m	DfT & Developer Contributions	£ 5,420,000.00	£ -	CBC	310	ABEGIJL
LCWIP route: E – Maidenbower to Three Bridges via Furnace Green	Transport - Highway Improvement (Cycling and Walking)	Three Bridges	Crawley LCWIP 2021	Desirable	No	Long Term	£ 700,000.00	Full costs to be established, estimated between £0.41m to £0.7m	DfT & Developer Contributions	£ 700,000.00	£ -	CBC	310	ABEGIJL

Scheme	Infrastructure Type	Neighbourhood	Reason for Improvement	Critical/ Essential/ Desirable	Forms Part of Crawley Growth Deal?	Phasing From	Approx Cost (£)	Extra information	Funding Sources Available	Potential Funding Gap	Potential Funding from Strategic CIL, as per IBP	Lead Organisation	Score out of 400	Criteria Met
Redevelop Fire Station at existing site  (including new traffic signal controlled fire appliance access onto A23 Brighton Rd)	Emergency Services	Northgate & West Green	Additional development may come forward at site.	Desirable	No	TBC	£ 4,000,000.00		ESCC, F&RS & Developer Contributions	£ 4,000,000.00	£ -	WSCC, F&RS and Capital Group.	310	ABEGIJL
Road Network Improvement- Station Road Gyratry	Transport – Highway/ Public transport and Active Travel infrastructure and public realm improvement	Northgate & West Green	Enhancement of public transport / active travel / public realm to support longer-term growth (including potential growth to the west of Crawley).	Desirable	No	Short Term	£ 5,200,000.00		WSCC, Funds currently administered by LEP & developer contributions	£ 5,200,000.00	£ -	WSCC & CBC.	310	ABEGIJL
Ecological enhancements to the SNCI and waterways  (Linking protecting and enhancing)	Open Space	Borough Wide	There is currently a lack of integration between types of green and blue infrastructure. Linking, protecting and enhancing valued green and blue infrastructure for people and wildlife is needed to prevent biodiversity loss and the erosion of recreational opportunities.	Desirable	No	TBC	£ -	TBC	Developer Contributions, Environmental Agency & Government Grants	£ -	£ -	CBC	290	ABEGJL
LCWIP route: K – Linwood Vale and Bewbush to town centre (joins route J)	Transport - Highway Improvement (Cycling and Walking)	Bewbush	Crawley LCWIP 2021	Desirable	No	Long Term	£ 9,000,000.00	Full costs to be established, estimated between £2.93m to £9m	DfT & Developer Contributions	£ 9,000,000.00	£ -	CBC	290	ABEGJL
LCWIP route: G – Tilgate to town centre (extended to K2 Crawley)	Transport - Highway Improvement (Cycling and Walking)	Tilgate	Crawley LCWIP 2021	Desirable	No	Medium Term	£ 4,810,000.00	Full costs to be established, estimated between £1.85m to £4.81m	DfT & Developer Contributions	£ 4,810,000.00	£ -	CBC	290	ABEGJL
LCWIP route: H – Pease Pottage to Southgate Roundabout (joins route G, J)	Transport - Highway Improvement (Cycling and Walking)	Tilgate	Crawley LCWIP 2021	Desirable	No	Long Term	£ 1,720,000.00	Full costs to be established, estimated at between £0.89m and 1.72m	DfT & Developer Contributions	£ 1,720,000.00	£ -	CBC	290	ABEGJL
LCWIP route: H – Southgate Roundabout to town centre via Tilgate (joins route G, J)	Transport - Highway Improvement (Cycling and Walking)	Tilgate	Crawley LCWIP 2021	Desirable	No	Medium Term	£ 6,230,000.00	Full costs to be established, estimated at between £2.78m and £6.23m	DfT & Developer Contributions	£ 6,230,000.00	£ -	CBC	290	ABEGJL
LCWIP route: I – Ashdown Drive/ Weald Drive (joins routes J, G and E)	Transport - Highway Improvement (Cycling and Walking)	Tilgate	Crawley LCWIP 2021	Desirable	No	Medium Term	£ 6,350,000.00	Full costs to be established, estimated between £2.01m to £6.35m	DfT & Developer Contributions	£ 6,350,000.00	£ -	CBC	290	ABEGJL

Scheme	Infrastructure Type	Neighbourhood	Reason for Improvement	Critical/ Essential/ Desirable	Forms Part of Crawley Growth Deal?	Phasing From	Approx Cost (£)	Extra information	Funding Sources Available	Potential Funding Gap	Potential Funding from Strategic CIL, as per IBP	Lead Organisation	Score out of 400	Criteria Met
LCWIP route: I – Bewbush to Three Bridges via Broadfield, Tilgate Nature Centre (joins routes J, G and E)	Transport - Highway Improvement (Cycling and Walking)	Bewbush	Crawley LCWIP 2021	Desirable	No	Long Term	£ 6,090,000.00	Full costs to be established, estimated between £1.99m to £6.09m	DfT & Developer Contributions	£ 6,090,000.00	£ -	CBC	290	ABEGJL
LCWIP route: L – Ifield to town centre	Transport - Highway Improvement (Cycling and Walking)	Ifield	Crawley LCWIP 2021	Desirable	No	Medium Term	£ 870,000.00	Full costs to be established, estimated between £0.84 to £0.87m	DfT & Developer Contributions	£ 870,000.00	£ -	CBC	290	ABEGJL
LCWIP route: M – Ifield Green to town centre	Transport - Highway Improvement (Cycling and Walking)	Ifield	Crawley LCWIP 2021	Desirable	No	Long Term	£ 5,100,000.00	Full costs to be established, estimated between £2.54m to £5.1m	DfT & Developer Contributions	£ 5,100,000.00	£ -	CBC	290	ABEGJL
LCWIP route: O – Manor Royal	Transport - Highway Improvement (Cycling and Walking)	Manor Royal	Crawley LCWIP 2021	Desirable	No	Medium Term	£ 1,740,000.00	Full costs to be established, estimated between £0.32m to £1.74m	DfT & Developer Contributions	£ 1,740,000.00	£ -	CBC	290	ABEGJL
LCWIP route: O – Manor Royal (west) to town centre	Transport - Highway Improvement (Cycling and Walking)	Manor Royal	Crawley LCWIP 2021	Desirable	No	Long Term	£ 1,750,000.00	Full costs to be established, estimated between £0.32m to £1.75m	DfT & Developer Contributions	£ 1,750,000.00	£ -	CBC	290	ABEGJL
LCWIP route: P – Fleming Way	Transport - Highway Improvement (Cycling and Walking)	Langley Green	Crawley LCWIP 2021	Desirable	No	Medium Term	£ 2,040,000.00	Full costs to be established, estimated at £2.04m	DfT & Developer Contributions	£ 2,040,000.00	£ -	CBC	290	ABEGJL
LCWIP route: P – Ifield to Manor Royal via Langley Green	Transport - Highway Improvement (Cycling and Walking)	Langley Green	Crawley LCWIP 2021	Desirable	No	Long Term	£ 720,000.00	Full costs to be established, estimated between £0.53m and £0.72m	DfT & Developer Contributions	£ 720,000.00	£ -	CBC	290	ABEGJL
LCWIP routes F – Tilgate to town centre via Furnace Green (joins route E)	Transport - Highway Improvement (Cycling and Walking)	Borough Wide	Crawley LCWIP 2021	Desirable	No	Medium Term	£ 2,500,000.00	Full costs to be established, estimated between £1.48m to £2.5m	DfT & Developer Contributions	£ 2,500,000.00	£ -	CBC	290	ABEGJL
Public Rights of Way	Open Space	Borough Wide	Maintain and enhance network.	Desirable	No	TBC	£ -		Developer Contributions & WSCC	£ -	£ -	WSCC	290	ABEGJL



Scheme	Infrastructure Type	Neighbourhood	Reason for Improvement	Critical/ Essential/ Desirable	Forms Part of Crawley Growth Deal?	Phasing From	Approx Cost (£)	Extra information	Funding Sources Available	Potential Funding Gap	Potential Funding from Strategic CIL, as per IBP	Lead Organisation	Score out of 400	Criteria Met
Ancillary Facilities (changing rooms) Southgate Playing Fields (Cricket & Rugby) Tilgate Playing Fields (Football) West Green (Cricket) Willoughby Fields (Rugby)	Open Space	Borough Wide	Existing facilities require refurbishment/ upgrading  (Crawley Borough Council Playing Pitch Strategy - Strategy and Action Plan, 2021)	Desirable	No	TBC	£ 250,000.00	Dependent on scope of works - total action plan investment programme likely to cost £250,000+	CBC & Developer contributions	£ 250,000.00	£ 250,000.00	CBC	285	ABEGJ
Provision 1 further synthetic turf pitches (3G)	Open Space	Borough Wide	Crawley Borough Council Playing Pitch Strategy - Strategy and Action Plan, 2021	Desirable	No	TBC	£ 900,000.00	3G Pitch - Approx.. £0.900m TBC	CBC & Developer contributions	£ 900,000.00	£ 900,000.00	CBC	285	ABEGJ
Hawth Theatre Expansion	Leisure	Furnace Green	To increase capacity of the studio.	Desirable	No	TBC	£ 3,000,000.00	TBC	TBC	£ 3,000,000.00	£ -	CBC	275	ABEGL
LCWIP route: D – Maidenbower to Three Bridges	Transport - Highway Improvement (Cycling and Walking)	Maidenbower	Crawley LCWIP 2021	Desirable	No	Medium Term	£ 4,680,000.00	Full costs to be established, estimated between £2.78m to £4.68m	DfT & Developer Contributions	£ 4,680,000.00	£ -	CBC	275	ABEGL
LCWIP route: J – Broadfield to town centre via Southgate	Transport - Highway Improvement (Cycling and Walking)	Broadfield	Crawley LCWIP 2021	Desirable	No	Long Term	£ 2,920,000.00	Full costs to be established, estimated between £1m to £2.92m	DfT & Developer Contributions	£ 2,920,000.00	£ -	CBC	275	ABEGL
LCWIP route: D – Three Bridges to Manor Royal (joins routes A, C)	Transport - Highway Improvement (Cycling and Walking)	Maidenbower	Crawley LCWIP 2021	Desirable	No	Medium Term	£ 2,990,000.00	Full costs to be established, estimated between £0.27m to £2.99m	DfT & Developer Contributions	£ 2,990,000.00	£ -	CBC	275	ABEGL
A2220 Station Way / A2004 Southgate Avenue – changes to lane allocations	Transport - Highway Improvement	Three Bridges	Crawley Transport Study 2022	Desirable	No	Short Term	TBC	Part of Reference case for 2022 Crawley Transport Study	DfT, WSCC & Developer contributions			WSCC	215	AEGJL
Public Art	Public Art	Northgate & West Green	To improve public realm	Desirable	Yes	TBC	£ 40,000.00	0	Developer Contributions	£ -	£ -	CBC	150	EFHJL
Gateway 2 (London Rd/ Manor Royal)	Public Realm	Northgate & West Green	Further Strengthening of the Manor Royal identity.	Desirable	Yes	Short Term	£ 80,000.00	0	Manor Royal Business Group, Funds currently administered by LEP and Developer Contributions	£ 27,000.00	£ -	MRBD in partnership with WSCC and CBC	145	EFHIJ
Gateway 4 (Gatwick Rd/ James Watt Way)	Public Realm	Northgate & West Green	Further Strengthening of the Manor Royal identity.	Desirable	Yes	Short Term	£ 200,000.00	0	Manor Royal Business Group, Funds currently administered by LEP and Developer Contributions	£ 200,000.00	£ -	MRBD in partnership with WSCC and CBC	120	EFIJ

Scheme	Infrastructure Type	Neighbourhood	Reason for Improvement	Critical/ Essential/ Desirable	Forms Part of Crawley Growth Deal?	Phasing From	Approx Cost (£)	Extra information	Funding Sources Available	Potential Funding Gap	Potential Funding from Strategic CIL, as per IBP	Lead Organisation	Score out of 400	Criteria Met
Improvements to Gatwick Road (Neighbourhood Style parade)	Public Realm	Northgate & West Green	To provide social and support facilities to local businesses that enhance the role and function of the business district	Desirable	Yes	Medium Term	£ 500,000.00	0	Manor Royal Business Group, Funds currently administered by LEP and developer contributions	£ 500,000.00	£ -	MRBD in partnership with WSCC and CBC	120	EFIJ
Road Safety	Road Safety	Borough Wide	Improved public health.	Desirable	No	Short Term	£ 31,500.00	0	WSCC & S106	£ -	£ -	WSCC	120	EGHJL
Safer Routes to school School Safety Zones	Road Safety	Borough Wide	Improved public health.	Desirable	No	Short Term	£ 20,000.00	0	WSCC & S106	£ -	£ -	WSCC	120	EGHJL
Station Gateway Full Phase	Transport - bus segregation, and signal prioritisation; active travel infrastructure; new bus station waiting structures and canopies; cycle hub and secure storage buildings	Three Bridges	As with Phase 1. But more generally to further encourage sustainable mode share/shift.	Desirable	No	Short Term	£ 5,400,000.00		Option to provide better bus station buildings and structures for an additional cost. DfT, WSCC, Funds currently administered by LEP, & Developer Contributions	£ 5,400,000.00	£ -	WSCC, CBC, DfT & LEP	115	EGIJL
Improvements to Ifield Station	Transport - Highway / Transport improvements	Ifield	Potential need for improvements if a further strategic development is undertaken to the West of Crawley in Horsham District.	Desirable	No	TBC	£ -	TBC	Developer contributions, WSCC and Network Rail.	£ -	£ -	Network Rail, WSCC, CBC & HDC.	95	EGJL

## APPENDIX C - Infrastructure Business Plan Outline 2024/25.

### Introduction

- Summary
- Projects identified as potential recipients of CIL Strategic and if anticipated to be delivered within the Short to Medium term.
- Date for next annual review.
- Governance Structure

### 1. Summary

- 1.1. This Infrastructure Business Plan (IBP) has been prepared by officers from Crawley Borough Council with input from West Sussex County Council and other Infrastructure Providers. It sets out the proposed priority infrastructure schemes required to support the delivery of the adopted Crawley Borough Local Plan 2023 to 2040.
- 1.2. This document identifies the projects that Crawley Borough Council intends to fund / enable using Community Infrastructure Levy (CIL) and presents an initial funding programme to 2028/29. This IBP project list represents the current understanding of projects appropriate to be funded via the CIL with a commitment that no “double counting” will take place.
- 1.3. It should be noted that in time the information within this document may be revised in the future, subject to process, to allow for additional unforeseen infrastructure requirements that might be identified. As the anticipated CIL funds are only an estimation, this document will also be reviewed each year to reflect how much CIL money has been received from the commencement of new residential developments.
- 1.4. A charging authority may apply CIL to administrative expenses incurred by it in connection with CIL. This is providing that it does not exceed 5% of total CIL contributions collected. Administrative costs cannot be paid using the 15% Neighbourhood Improvement Strand of CIL.
- 1.5. Where an authority spends less than its permitted allowance on administrative expenses, it must transfer the remaining allowance for use on capital infrastructure projects. If Crawley BC does not apply the discretionary administrative expenses, then a maximum of 85% of CIL collected in Crawley will be spent on strategic infrastructure.
- 1.6. The Strategic Infrastructure Strand should not be used to remedy pre-existing deficiencies in infrastructure provision unless the deficiencies are exacerbated by new development.

**2. Strategic Infrastructure Strand (SIS) - Projects identified as critical/ essential and proposal for the funding programme.**

2.1. Projects identified as a priority to receive a contribution from CIL are proposed / presented in the table below. Officers have based the priority projects outlined in the Infrastructure Business Plan on the Crawley Infrastructure Delivery Schedule (see Appendix B), which is already in place through the Crawley Local Plan 2023-2040 process and officers have identified all strategic infrastructure requirements as a result of the growth forecast indicated in the Local Plan. The projects outlined below for this Infrastructure Business Plan have all been assessed as Critical or as high scoring essential projects in terms of their level of importance in supporting Crawley’s growth.

<b>Projects identified.</b>	<b>Criteria Met</b>	<b>Score</b>	<b>%</b>	<b>Phasing</b>	<b>Total Potential CIL Contributions</b>
A23 Crawley Avenue/ Ifield Avenue roundabout	ABCGHIJKL	390	98%	Medium Term	£488,308.00
A2011/A2004/ Hazelwick Av. / Gatwick Rd. junction improvement	ABCGHIJKL	390	98%	Short Term	£360,000.00
A23 London Road/ Manor Royal	ABCFIJKL	375	94%	Short Term	£432,000.00
Improvement to Three Bridges Railway Station	ABDFHIJKL	375	94%	Short Term	£2,050,000.00
A2011/A23/London Road “Tushmore junction”.	ABCGHJKL	370	93%	Short Term	£1,380,000.00
M23 Junction 10 Southbound Merge	ABCGIJKL	365	91%	Longer Term	£1,430,201.00
M23 Junction 11 Northbound Diverge and Merge	ABCGIJKL	365	91%	Medium Term	£3,646,620.00
SEND Education provision – approx.. 14 places	ABCGJKL	345	86%	Medium Term to Long Term	£1,400,000.00
New early years provision: approx. 252 places, location to be determined	ABCGJKL	345	86%	Medium to Long Term	£2,000,000.00
LCWIP route A – Gatwick Airport to Manor Royal	ABDGIJKL	340	85%	Medium Term	£4,560,000.00
LCWIP route: B – Pound Hill to Manor Royal via Forge Wood	ABDGIJKL	340	85%	Medium Term	£1,095,000.00
Pound Hill Medical Group - build 2 additional consulting rooms	ABDGIJKL	340	85%	Short Term	£144,000.00
Saxonbrook Medical Centre - Creating 2 additional consulting	ABDGIJKL	340	85%	Short Term	£32,000.00

**£19,018,129.00**

2.2. Proposed Funding Programme to 2039/40.

Proposed Funding Programme		SIS CIL Collected to date	2023/24-2032/33	(2033/34-2039/40)
SIS CIL Money Actual		4.226		
SIS Funds Anticipated			9.779	5.474
		Proposed CIL Contributions from the above amount of CIL SIS Monies:	Proposed Future Contributions of CIL SIS Monies	Further Future Contributions of CIL SIS Monies Proposed
2024/25 to 2029/30	Three Bridges Railway Station Improvement project	-2.05		
	A23/ Manor Royal junction project	-0.432		
	A2011 Crawley Avenue/ A2004 Northgate Avenue improvements	-0.36		
	Saxonbrook Medical Centre, Northgate - Creating 2 additional consulting rooms – <b>PROPOSED TO BE REMOVED</b>	-0.032		
	Pound Hill Medical Group - build 2 additional consulting rooms <b>PROPOSED TO BE REMOVED</b>	-0.144		
	Tushmore Junction	-1.208	-0.172	
2029/30 to 2033/34	A23 Crawley Avenue/ Ifield Avenue Roundabout improvements		-0.488	
	M23 Junction 11 Northbound Diverge and Merge		-3.647	
	LCWIP Route A – Gatwick Airport to Manor Royal,		-4.386	-0.174
	LCWIP route: B – Pound Hill to Manor Royal via Forge Wood		-1.095	
2034/35 to 2039/40	A contribution to Education, Early Years Provision – Locations to be determined			-2
	SEND educational provision (approx.. 14 places)			-1.4
	M23 Junction 10 Southbound Merge			-1.43
		0	-9.788	-5.004

2.3. There is a risk that the spend profiles of projects for delivery within the Short Term will be mismatched against the receipts of CIL contributions. Councils are unable to borrow against anticipated levy income, but they can be used to repay expenditure on infrastructure that has already been incurred, provided that expenditure is in line with recognised priority infrastructure schemes as identified within the CIL Infrastructure Business Plan. (IBP)

2.3.1. The funds associated with the 5% admin charge will fluctuate as they will be collected and allocated throughout the year.

2.3.2. Any funds collected in the period 2024/25 to 2028/29 that remain unspent will be carried forward into the next funding programme 2029/30 to 2033/34.

2.3.3. The priority projects identified for delivery in the Medium Term will be progressed in the next funding programme 2029/30 to 2033/34 as funds become available and details are finalised.

**3. Neighbourhood Improvement Strand (NIS) - Projects identified as critical/ essential and proposal for the funding programme.**

3.1. Projects identified as a priority to receive a contribution from NIS CIL are proposed / presented in the table below. Officers have based the priority projects outlined in the Infrastructure Business Plan on the Crawley Infrastructure Delivery Schedule (see Appendix B), which is already in place through the Local Plan process and have identified all strategic infrastructure requirements as a result of the growth forecast indicated in the Local Plan. The projects outlined below for this Infrastructure Business Plan have all been assessed as essential or as high scoring desirable projects in terms of their level of importance in supporting Crawley’s growth and are proposed as priority allocations for the CIL NIS.

Projects identified	Criteria Met	Score	%	Phasing	Total Potential CIL Contributions
Unsupervised Play Investment Programme Provision and improvements to Play Areas (Type A, B & C)	ABDGHJK	340	85%	Short Term to Long Term	£2,257,338.00
Three Bridges 3G Synthetic Turf Pitch 3G	ABEGHIJ	330	83%	2024/25	£25,000.00
Additional Allotment Provision	ABEGHJL	315	79%	TBC	£50,000.00
Provision 1 further synthetic turf pitches (3G)	ABEGJ	285	71%	TBC	£900,000.00
					<b>£3,232,338.00</b>

3.2. Proposed Neighbourhood Improvement Strand (NIS) Funding Programme to 2039/40

		<b>NIS Collected to date</b>	<b>2024/25- 2032/33</b>	<b>2033/34- 2039/40</b>
	NIS Money Actual (Received)	0.763		
	NIS Spend to date	-0.105		
	Reserved from Previous Funding Period		0.204	0.131
	NIS Funds Anticipated		1.822	1.026
2024/25 to 2028/29	Unsupervised Play Investment Programme 2024/25 to 2027/28	-0.409	-0.550	
	3G pitch at Three Bridges	-0.025		
	Neighbourhood Improvement Fund	-0.020		
2029/30 to 2033/34	Unsupervised Play Investment Programme (UPIP) 2029/30 to 2033/34		-0.965	
	Additional Allotment Provision		-0.050	
2034/35 to 2039/40	Further Unsupervised Play Investment Programme (UPIP) 2034/35 to 2039/40		-0.330	
	Provision of 1 further synthetic Turf Pitch			-0.900
		<b>0.204</b>	<b>0.131</b>	<b>0.257</b>

3.3. Any funds collected in the period 2024/25 to 2028/29 that remain unspent will be carried forward into the next funding programme 2029/30 to 2033/34.

3.4. The priority projects identified for delivery in the Medium Term will be progressed in the next funding programme 2029/30 to 2033/34 as funds become available and details are finalised.

**4. Governance**

- 4.1. In line with the Crawley Growth Deal between CBC and WSCC, it is proposed that the allocation and spend of CIL funding will continue to be governed jointly by the two authorities through the Crawley Growth Board, chaired by the CBC Chief Executive, which meets every 2 months with agreed recommendations then put to CBC Cabinet for approval when key decisions are required on CIL funding allocations to individual infrastructure schemes.
- 4.2. The existing cross party Economic Regeneration Working Group of CBC Members will also have an opportunity to review proposals for CIL spend and make recommendations to the Chair and Head of Economy and Planning. WSCC Cabinet members and local County Council members will be consulted as appropriate.

**5. Date of next annual review**

- 5.1. Proposals to revise / update the Infrastructure Business Plan will be presented to Cabinet for approval in March 2026.



# Agenda Item 11

By virtue of paragraph(s) 3 of Part 1 of Schedule 12A  
of the Local Government Act 1972.

Document is Restricted

This page is intentionally left blank