

Croydon & Lewisham Street Lighting Joint Committee

DATE OF DECISION	<i>10 December 2024</i>	
REPORT TITLE:	The Joint Street Lighting PFI Update	
CORPORATE DIRECTOR / DIRECTOR:	Croydon: Corporate Director of Sustainable Communities, Regeneration and Economic Recovery. Lewisham: Executive Director for Place	
LEAD OFFICER:	John Algar: Street Lighting Manager	
LEAD MEMBER:	Croydon: Councillors Scott Roche and Robert Ward Lewisham: Councillors Louise Krupski and Amanda De Ryk	
AUTHORITY TO TAKE DECISION:	N/A: Governance of PFI Contract.	
KEY DECISION?	N/A	
CONTAINS EXEMPT INFORMATION?	NO	
WARDS AFFECTED:	All	

SUMMARY OF REPORT:

This report advises the Committee of the overall performance of the service provider during September 2023 – August 2024.

COUNCIL PRIORITIES:**Croydon:**

Croydon Councils corporate priorities of cleaning up Croydon, addressing planning and town centre regeneration, tackling violent crime, speeding up housing improvements and financial discipline and recovery.

Lewisham

Lewisham Council's corporate priorities of making Lewisham greener and building safer communities.

FINANCIAL IMPACT:

Noting the recommendations in this report will reflect the agreement made by Croydon and Lewisham Council to the sums set out in the P.F.I contract agreement. Each authority has made plans as it considers appropriate for the financial implications of the project. No additional expenditure is proposed because of this report.

1. Recommendations

For the reasons set out in the report the Committee is asked to:

- Note the performance of Service Provider in respect of the street lighting PFI for September 2023 - August 2024
- Approve the proposed unitary charges for 2024/5 of £2.905m for Croydon and £1.634m for Lewisham (based on a 64% to 36% split)
- Approve the forecasted contract management and monitoring costs for 2024/5 of £179,000 for Croydon and £101,000 for Lewisham (based on 64% to 36% split).

Actions from last meeting: 19 October 2023

None

2.Executive Summary

2.1 This report advises the Committee of the overall performance of the service provider during September 2023 – August 2024.

3.Detail: Operational Performance Standards Overview

- 3.1 The Output Specification for this contract defines both Councils' requirements for the service that the service provider shall provide pursuant to this contract. The performance standards within the Output Specification specify the required outcome, service delivery, performance requirements and measurement criteria in respect of each part of the service. The performance is reviewed on a monthly basis as part of the "Monthly Monitoring/Payment Report" and this is linked directly to any financial adjustments for failing to meet the minimum requirements set out each performance standard.
- 3.2 The service provider shall perform the service in accordance with the following performance standards:

PS1 – Core Investment Programme.

- 3.3 The service provider designed and installed new apparatus during the five-year Core Investment Programme (CIP) across both councils to the current British Standards and contract specification. The Core Investment Programme was completed 31 October 2016. The Croydon Public Lighting Network Cable has been de-energised and abandoned by UKPN. The old stumps that were previously keeping the Public Lighting Network Cable functioning have been completely removed.

PS2 - Planned Maintenance, Inspection and Testing.

- 3.4 This performance standard covers planned maintenance, inspection and testing of street lighting equipment. Routine scouting of all streetlights (including CMS) is undertaken, and the performance is measured over a four-month period. During the period September 2023 – August 2024 the following wards were completed as part of the Annual Programme:

Bulk Clean and Change & Electrical Testing (Columns Y1)

Croydon: Ashburton(946), Fieldway(945), New Addington(738), Shirley(945), Coulsdon East(1083), Coulsdon West(1450), Sanderstead(1192).

Lewisham: Catford South(582), Perry Vale(741), Bellingham(1013), Whitefoot(722)

Total Assets: 11,441 across both boroughs.

Electrical Testing Signs (Signs Y2)

Croydon: Ashburton(946), Fieldway(945), New Addington(738), Shirley(945), Coulsdon East(1083), Coulsdon West(1450), Sanderstead(1192).

Lewisham: Catford South(57), Perry Vale(91), Bellingham(52), Whitefoot(53)

Total Assets: 1,110 across both boroughs

Signs Clean only (Y2)

Lewisham: Catford South(57), Perry Vale(84), Bellingham(47), Forest Hill(60), Sydenham(37), Blackheath(168), Grove Park(57), Crofton Park(95), Lewisham Central(153), Brockley(210), Rushey Green(104), Lee Green(116), Ladywell(55), Evelyn(175), Telegraph Hill(128), New Cross Gate(97), Downham(160)

Croydon: Ashburton(122), Fieldway(72), New Addington(79), Shirley(80), Broad Green(313), Norbury(74), South Norwood(153), Thornton Heath(162), Upper Norwood(186), Waddon(227), West Thornton(131), Addiscombe(174), Bensham Manor(150), Fairfield(407), Selhurst(197), Woodside(220), Croham(292), Heathfield(161), Purley(134), Selsdon & Ballards(20), Coulsdon East(63), Coulsdon West(234), Kenley(47), Sanderstead(113).

Total Assets: 5,667 across both boroughs

Visual Inspections (Y1)

Croydon: Ashburton(946), Fieldway(945), Shirley(935), Coulsdon East(1012), Coulsdon West(1450), Sanderstead(1191), Heathfield(1487), Purley(134), Selsdon & Ballards(913), Kenley(1084),

Lewisham: Catford South(582), Perry Vale(742), Bellingham(1013), Whitefoot(713), Telegraph Hill(887), New Cross Gate(1131), Downham(1035),

Total Assets: 15,484 across both boroughs.

Structural Testing: Deemed to Comply Lamp Columns

Lewisham: Forest Hill(715), Sydenham(833), Blackheath(956), Grove Park(556),

Croydon: Upper Norwood(1005), Thornton Heath(835), Waddon(1051), West Thornton(754),

Total Assets: 6,705 across both boroughs.

The service provider continues to deliver a good standard of performance within this performance standard. Joint site inspections are carried out between client monitoring team and service provider to verify works have been completed.

However, after carrying out monthly routine checks on the annual programmes the client monitoring team highlighted incomplete works, reflecting in financial adjustments being applied in November 2023 and March 2024 monthly payment reports.

3.5 The table below illustrates the overall performance over the last 12 months for lights in light. The service provider continues to perform at a high standard and has achieved the required level of 99% lights throughout this period, therefore no financial adjustment has occurred within this performance standard.

	August 2024	July 2024	June 2024	May 2024
# occasions not In Light	72	74	68	57
# Lighting Points	47,989	47,994	47,992	48,013
In Light **	99.850%	99.846%	99.858%	99.881%
In Light:	99.859%			

	April 2024	March 2024	February 2024	January 2024
# occasions not In Light	44	57	89	145
# Lighting Points	48,039	95,998	95,882	95,754
In Light **	99.908%	99.941%	99.907%	99.849%
In Light:	99.901%			

	December 2023	November 2023	October 2023	September 2023
# occasions not In Light	87	168	203	210
# Lighting Points	95,808	95,658	47,771	47,762
In Light **	99.909%	99.824%	99.575%	99.560%
In Light:	99.717%			

3.6 Client monitoring team continue to carry out its own shadow night scouts to verify the quality of the service providers night scouts and to review all vehicle tracker reports. The accuracy of the Central Management System is also validated.

The client monitoring team continue to carry out night and day site checks to verify that all car park, subway and housing assets are operating correctly, as not all assets are connected to the Central Management System.

Management Information system used to verify all findings.

All column outages are reported via City Touch on the Central Management System.

The service provider continues to deliver a good standard of performance within this performance standard. Joint site inspections carried out between client monitoring team and service provider to verify works have been completed.

Service provider still scouting for illuminated signs out of light, doors off, damaged sign plates, twisted sign lights or any other maintenance issues to any other attachments. Service provider continues to night scout at their own discretion. All car parks and subways where fittings do not have the capacity for nodes to be connected to the CMS are being scouted in the daytime as these are operational 24 hours.

PS3 - Operational Responsiveness and Reactive Maintenance.

- 3.7 This performance standard covers the operational responsiveness of the service provider to attend to faults within the relevant rectification period.
- 3.8 The tables below illustrate the performance for emergency and non – emergency faults in and out of time for the period of September 2023 – August 2024.

Table 1 - Faults completed within contractual timescale:

Fault Type	Number of occasions: In Time						
	Sept 2023	Oct 2023	Nov 2023	Dec 2023	Jan 2024	Feb 2024	Mar 2024
Emergency faults	10	10	14	19	33	23	17
Non-Emergency Faults	353	460	361	273	439	375	331

Fault Type	Number of occasions: In Time						
	Apr 2024	May 2024	Jun 2024	Jul 2024	Aug 2024		
Emergency faults	12	8	11	11	12		
Non-Emergency Faults	278	295	244	310	313		

Table 2 - Faults completed outside contractual timescale.

Fault Type	Number of occasions: Out of Time						
	Sept 2023	Oct 2023	Nov 2023	Dec 2023	Jan 2024	Feb 2024	Mar 2024
Emergency faults	0	0	0	0	0	0	2
Non-Emergency Faults	0	0	0	0	0	0	0

Fault Type	Number of occasions: Out of Time						
	Apr 2024	May 2024	Jun 2024	Jul 2024	Aug 2024		
Emergency faults	0	0	0	0	0		
Non-Emergency Faults	0	1	0	0	0		

3.9 During this reporting period as detailed in table 2 above, all emergency faults were attended within the 1-hour timeframe apart from March 2024 where 2 call outs were attended late due to information passed to website instead of Milestones call centre. Evidence was provided by service provider of which financial adjustment was waived.

For non – emergency Faults as detailed in table 2 above, all faults were repaired within the 4-day rectification timeframe apart from May 2024 which financial adjustments were applied.

PS4 - Contract Management and Customer Interface.

3.10 For the service period, the service provider shall provide a customer care and contract management service in accordance with this Performance Standard that includes the development, operation and maintenance of a Management Information System (MIS) and Customer Care System (CCS).

3.11 The table below shows telephone calls received by the call centre and emergency phone line during the period September 2023 to August 2024. The performance target is 95% of all calls being answered within 25 seconds of which this target has been achieved apart from January 2024, which financial adjustments were applied.

Sep 2023	Oct 2023	Nov 2023	Dec 2023	Jan 2024	Feb 2024	Mar 2024	Prescribed response period
96	106	101	89	69	90	86	= # calls received by call centre/ emergency phone line
93	105	96	85	64	87	84	= # answered by a trained call agent within 25 seconds
96.88%	99.06%	95.05	95.51%	92.75%	96.67%	97.67%	= % answered by a trained call agent within 25 seconds

Apr 2024	May 2024	Jun 2024	Jul 2024	Aug 2024			Prescribed response period
72	75	53	73	66			= # calls received by call centre / emergency phone line
70	73	51	72	64			= # answered by a trained call agent within 25 seconds
97.22%	97.33%	96.23%	98.63%	96.97%			= % answered by a trained call agent within 25 seconds

PS5 - Strategic Assistance and Reporting.

3.12 The service provider shall provide relevant, accurate and timely information to the councils on its performance in relation to the services in Monthly Service Reports and Annual Service Reports to ensure that the strategic assistance and reporting procedures adopted for delivery of the Service:

- (i) enable the Councils to properly monitor the Service and have sufficient data and information to assess accurately what Adjustments, (if any) to the Unitary Charge should be made.
- (ii) allow the Councils to demonstrate that it is achieving its Best Value Duty and continuous improvement in the delivery of the Service; and
- (iii) allow the Councils to regularly review the Service to determine whether it meets current and future needs; consult with users and other stakeholders and benchmark performance against other Service Providers.

Monthly monitoring and Monthly Payment Reports are combined to reduce the administration burden for the councils and are provided by the fifth business day of the month following the month for which the report relates.

For this period all reports were received on time.

PS6 - Working Practices.

3.13 Performance Standard 6 requires the Service Provider to ensure it operates the day-to-day working practices correctly and safely in line with all generic Method Statements and Risk Assessments

During September 2023 – August 2024 there were no serious or urgent service failures.

Routine service failures were identified during this period but not exceeding the 25 permitted points target, therefore no financial deductions applied.

Overall, the service provider continues to perform very well with regards to staff Health & Safety issues for its own staff and ensuring site conditions are monitored and kept in a safe condition.

Fortnightly meetings are carried out with the service provider, to resolve any potential issues and collaborate works with both authorities NRSWA teams to minimize any disruption.

Below is the table of any service failures under PS6 Working Practices

Categories of the faults relating to these practices are detailed below:

Fault Type	Definition	September 2023	October 2023	November 2023	December 2023	January 2024	February 2024	March 2024
Urgent service faults	Any Service Failure that: (a) poses a material risk to life; or (b) poses a material risk of damage to person and/or property; or (c) poses a material risk of significant financial loss and/or disruption to the Authority.	0	0	0	0	0	0	0
Serious service faults	Any Service Failure that is such that it may develop into an Urgent Service Failure if not rectified or attended to in accordance with Good Industry Practice.	0	0	0	0	0	0	0
Routine service faults	Any Service Failure that is not immediately detrimental or likely to lead to a Serious Service Failure or an Urgent Service Failure, but that, if not rectified or attended to in accordance with Good Industry Practice, may adversely impact on the Service and / or the Authority's reputation and / or the Service Provider's reputation.	0	0	0	0	5	5	0

Fault Type	Definition	April 2024	May 2024	June 2024	July 2024	August 2024
Urgent service faults	Any Service Failure that: <ul style="list-style-type: none"> (a) poses a material risk to life; or (b) poses a material risk of damage to person and/or property; or (c) poses a material risk of significant financial loss and/or disruption to the Authority. 	0	0	0	0	0
Serious service faults	Any Service Failure that is such that it may develop into an Urgent Service Failure if not rectified or attended to in accordance with Good Industry Practice.	0	0	0	0	0
Routine service faults	Any Service Failure that is not immediately detrimental or likely to lead to a Serious Service Failure or an Urgent Service Failure, but that, if not rectified or attended to in accordance with Good Industry Practice, may adversely impact on the Service and / or the Authority's reputation and / or the Service Provider's reputation.	0	0	5	0	0

PS7 - Reporting to the Authority.

- 3.14 In order for the Councils to monitor the performance of the service provider and to ensure appropriate monthly payments are made under the contract, the service provider shall provide accurate and complete reporting to the Councils on how the service provider is complying with the requirements of the Output Specification.

Over this period the committee are asked to note all reports were submitted on time.

PS9 - Central Management System.

- 3.15 When this contract was awarded both councils opted for a Central Management System (CMS) to be installed to all streetlights as part of a “mandatory variant solution”. In technical terms the key difference between the mandatory variant solutions and standard Solutions is that the mandatory variant solution enables lights to be dimmed, or brightened, flexibly, whereas in the standard solution lights will only come on and off at fixed ambient light levels. The advantage of the mandatory variant solutions is its flexibility, and the opportunity that it affords to cut energy consumption and therefore costs or otherwise to respond to policy considerations. This is something both boroughs have explored under a Variable Lighting Policy.

- 3.16 Once the Independent Certifier issued the Certificate of Compliance for the new street lighting on a street-by-street basis the Service Provider ensured that all Replacement CIP Apparatus is connected to and operating on the Central Management System.

The client team are continuing to monitor the current operation of the CMS which has resulted in a reduction of failures within the system. Client team officers review the information provided by City Touch so that checks can be carried out to ensure any outages are raised within the M.I.S within the 4-day rectification period.

- 3.17 After the completion of the Core Investment Programme across both boroughs as of August 2024 there are 41,651 street lighting columns connected to the Central Management System (see below). The remaining assets are in subways and car parks that are not connected to the CMS and are scouted separately.

	Croydon	Lewisham	Months Total
Previous Total	25,313	16,298	41,611
Aug-24	38	2	40
Current Total	25,351	16,300	41,651

Total Number of Certified assets connected to CMS	41,651
Days in Month	31
Unit/days Comms	1,291,181
Number of Unreachable units in month	500
CMS Communicating	99.96%

- 3.18 Lewisham introduced their variant lighting level policy in November 2016 which received Mayor and Cabinet approval. To date the service provider and the client monitoring team have still not received any specific complaints in relation to the introduction of this policy.

- 3.19 Croydon introduced their Street Lighting Policy in February 2023. To date the service provider and the client monitoring team have still not received any specific complaints in relation to the introduction of this policy.

4. CONSULTATION

- 4.1 During the mobilisation phase and throughout the CIP, the Service Provider was required to liaise and consult with all relevant bodies, which included the Councils, its officers, and all other stakeholders.
- 4.2 There is a mechanism built within the Output Specification to ensure that this consultation process takes place.
- 4.3 As the CIP programme has finished both Authorities have agreed not to consult with residents about any customer satisfaction surveys as they feel the information will not be beneficial.

5 FINANCIAL AND RISK ASSESSMENT CONSIDERATIONS

- 5.1 As per the Co-Operation Agreement the Joint Committee is required to submit final estimates for approval to the Constituent Authorities no later than November 30th. The Joint Committee is then to set its budget no later than March 15th each year. The structure of the Payment Mechanism includes a payment in arrears for the service. Any under performance in a period will be reflected in a payment adjustment in the following period. A draft Monthly Payment Report is provided to the Councils within five business days of the month for which it is reporting no later than the end of the month a final monthly payment report is issued to the authority and the authority has 20 business days to settle the account.
- 5.2 The budget for running the Joint Committee itself is minimal and can be contained within the overall project budget or other existing budgets. The contract budget for the year is as set out in the PFI financial model. This budget includes provision for expenditure on the PFI contract itself, the contract monitoring costs and contributions into the sinking fund to even out PFI liabilities over the life of contract, with LBC acting as the lead authority on payments. The anticipated cost for 2024/25 is expected to be £11.699m. The proposed unitary charge in 2024/25 for Croydon and Lewisham works out at £2.905m and £1.634m respectively (based on agreed 64% to 36% split), with the remaining contribution derived from PFI credits provided by the Department for Transport. Energy costs are paid directly to the respective energy suppliers by the individual authorities and are not part of the sinking fund payment process.
- 5.3 The forecasted contract management and monitoring costs for 2024/25 based on 64% to 36% split are Croydon £179,000, Lewisham £101,000.
- 5.4 The financial model sinking fund is periodically reviewed to ensure that adequate resources are set aside for future liabilities. The contributions for 2024/25 have been adjusted accordingly. These are offset in part by contract performance deductions.
- 5.5 Both Croydon and Lewisham have completed the refinancing of the senior debt related to the Croydon & Lewisham Street lighting PFI.
- 5.6 Financial discussion been had with both authorities in relation to the possible LED lantern replacements. Details passed to both finance teams and Councillors with decisions to be made to progress. Client team have achieved the 5 year pay back for both authorities and service provider has reduced costs and provided further maintenance savings to both authorities.

Approved by: William Zellerbach, Finance Manager SCRER (Croydon),13.09.2024.

Approved by: Shola Ojo, Strategic Finance Business Partner HRPR(Lewisham) 17.09.2024.

6. LEGAL CONSIDERATIONS

- 6.1 To align the constituent authorities, the legal teams created two agreements, the Governance Agreement and the Co-operation Agreement.
- 6.2 The Governance Agreement was put in place to set out the joint arrangements for the management of the joint street lighting PFI Project. It details the functions of the Joint Committee, its constitution and decision-making powers.
- 6.3 The Co-operation Agreement sets out the detailed arrangements relating to operation matters including how any disputes between the constituent authorities are to be settled and budget provisions to cover the management costs of the Project.
- 6.4 It is the function of the Joint Committee to monitor the operational performance of the Service Provider and to receive reports from the Management Board consisting of two representatives of each constituent authority as to the Service Provider's performance over the last quarter.

Approved by: Kiri Bailey, Head of Commercial & Property Law (Croydon) 19.09.2024

Approved by: Melanie Dawson, Principal Lawyer (Lewisham) 17.09.2024

7. HUMAN RESOURCES IMPACT

- 7.1 There are no Human Resources considerations arising from this report. If any should arise these will be managed under the Councils Policies and Procedures.

Approved by: Jennifer Sankar, Head of Human Resources (Croydon) for Housing Directorate and SCRER Directorate for and on behalf of Dean Shoesmith, Chief People Officer (Croydon). 20.09.2024.

8. EQUALITIES IMPACT

- 8.1 An updated Equalities Impact Assessment (EIA) has been undertaken, and there are no specific disadvantages associated with replacing the street lighting in the boroughs. Indeed, the enhanced lighting will be of benefits to all residents and businesses.

Lewisham and Croydon have introduced their variable lighting Policies across both boroughs which included an updated EIA.

Both Authorities have their own separated policies which do not need to be linked.

Approved by: Ken Orlukwu, Senior Equalities Officer, on behalf of Helen Reeves, Head of Strategy & Policy, 20.09.2024.

9. ENVIRONMENTAL IMPACT

- 9.1 Carbon emissions from Croydon & Lewisham's Street lighting are shown in the tables below. While annual consumption has steadily decreased since 2019/20 the total annual CO₂ emissions have decreased by 65% over 7 years. This is due to the rapid decarbonisation of the

UK electricity grid that has been achieved by significant growth of renewable energy generation (primarily offshore wind and large-scale solar farms).

Croydon

Year	Consumption kWh	CO₂ tonne	Grid carbon emission factor (kg CO₂ kWh)
2023/24	6,974,370	1553	0.2269
2022/23	7,028,724	1,468	0.20890
2021/22	8,652,508	1,837	0.21233
2020/21	8,989,281	2,256	0.25091
2019/20	10,450,119	2,875	0.27511
2018/19	11,320,710	3,451	0.30482
2017/18	10,014,298	3,820	0.38146
2016/17	9,860,865	4,404	0.44662

Lewisham

Year	Consumption kWh	CO₂ tonne	Grid carbon emission factor (kg CO₂ kWh)
2023/24	4,196,240	934	0.22269
2022/23	4,292,280	897	0.20890
2021/22	4,233,664	968	0.22876
2020/21	4,126,786	1,035	0.25091
2019/20	4,381,438	1,205	0.27511
2018/19	4,432,250	1,351	0.30482
2017/18	4,900,020	1,869	0.38146
2016/17	6,357,241	2,839	0.44662

- 9.2 The CMS functionality has helped manage the total annual consumption through implementation of both boroughs Variant Lighting Level Policies. Reductions achieved through this has minimised electricity costs and the associated CO₂ emissions. Further consumption reductions would be secured from moving to LED lamps (subject to viability assessment).
- 9.3 Croydon Council has declared a 'Climate Emergency' and has set a target to be carbon neutral by 2030. Croydon does not purchase renewable electricity as certified by 'Renewable Energy Guarantee of Origin' (REGO) certificates. This is because such supplies do not deliver any additional CO₂ savings than a standard electricity contract. The decarbonisation of the grid (as highlighted in the above table) has been achieved by the regulated market subsidy mechanisms. The cost of this is passed on to all electricity users via the fixed charges. Current government policies are to deliver a zero-carbon grid by 2050. Croydon will therefore need to secure additional zero carbon electricity through its contracts to achieve the 2030 target.

- 9.4 Croydon is currently working with other London boroughs to identify the best value options to secure 100% renewable electricity. This is through the 'Renewable Power for London' programme established by London Councils.
- 9.5 Lewisham Council's Climate Emergency Action Plan sets out actions in support of the ambition for the borough to be net zero by 2030 <https://lewisham.gov.uk/-/media/0-services/environment/climate-emergency/climate-emergency-action-plan-2024.pdf> . Achieving that ambition is hugely challenging and will require significant and sustained investment nationally, regionally, and locally. An important focus of that work is decarbonising the Council's own operations, which includes street lighting. In the Council's most recent published data on corporate carbon emissions for the year 2022/23 street lighting equates to just over 7% of the Council's scope 1 and 2 emissions from sources owned and managed by the Council. <https://lewisham.gov.uk/-/media/environment/lewisham-council-corporate-carbon-emissions-report-2022-23.pdf>
- 9.6 In 2017/18 Lewisham Council achieved a reduction of 1,457,221 kWh and consequently a reduction of almost 1,000 tonnes of CO2 because of a new variable lighting policy through the CMS functionality. This policy implemented targeted dimming of streetlights, the pushing back of switch-on times and bringing forward of switch-off times for streetlights.
- 9.7 Lewisham Council supports the ongoing assessment of the viability of LED lights which could offer further significant reductions in energy consumption and associated emissions.

Approved by: Bob Fiddik, Team Leader – Sustainable Development & Energy (Croydon)
16.09.2024.

Approved by: Martin O'Brien – Climate Resilience Manager (Lewisham) 13.09.2024

10. CRIME AND DISORDER REDUCTION IMPACT

- 10.1 The general improvement of the street lighting has as expected had a positive impact in the lower levels of crime and disorder.

11. CUSTOMER IMPACT

- 11.1 The core objective of the street lighting replacement programme, the replacement of the existing aged equipment with a new and well-maintained service, had a positive impact on the residents.
- 11.2 Croydon and Lewisham have introduced their variant lighting level policy's and results show there is no major impact on residents and stakeholders as no complaints been received.

12. DATA PROTECTION IMPLICATIONS

- 12.1 Will the subject of the report involve the processing of "personal data"?
NO.

Has a Data Protection impact assessment (DPIA) been completed?
Not Required.

CONTACT OFFICERS:

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Appendices to add to this report: None

Background Papers: *None*