



Croydon Council Conservative Group

Planning for the Future Consultation

Planning Directorate

3rd Floor, Fry Building

2 Marsham Street

London

SW1P 4DF

29th October 2020

Dear Sir or Madam

We write in our capacity as the Croydon Council Conservative Group, comprising the 29 Conservative Councillors from the London Borough of Croydon.

Whilst we welcome the Government's desire to bring greater speed and transparency to the planning system we do have some concerns which we have highlighted against the various proposals below.

It is worth noting that the London Borough of Croydon has been subjected to a zealous over intensification by the current Labour Council who, through the Local Plan, have produced their own blueprint for development.

This has resulted in widespread over intensification and the character assassination of our suburbs.

Too many proposals are riding roughshod over local residents concerns and introducing alien development into the borough.

Too many decent family homes are being lost to faceless blocks of nine flats.

Too many of these schemes are a significant distance from local transport hubs and infrastructure and inflict real harm on the amenities of neighbours and the community generally.

Therefore, in Croydon the Government's proposals are viewed with some concern as the borough is already experiencing what can happen when developers are given the upper hand.

Local communities are concerned that the proposals in this paper will lead to more of the same, particularly when potentially entrusting rules and zoning to an already 'developer friendly' Local Authority.

These plans could be even more devastating for our borough. Too many residents of our borough have lost faith in the planning system because of the actions of Croydon's Labour Council.



Pillar One – Planning for development

Proposal 1: The role of land use plans should be simplified. We propose that Local Plans should identify three types of land – Growth areas suitable for substantial development, Renewal areas suitable for development, and areas that are Protected.

- Although these zones will be identified in the local plan, it is not 100% clear who will identify them.
- Any zoning needs to be very specific and at the right granular level.
- On the assumption that the zones are identified by the planning authority, who will scrutinise these decisions? In the context of Croydon it is very worrying to think that the Labour Council would have control of this, particularly as the Cabinet Member responsible has already said that virtually the whole borough would be a growth zone.
- Protected areas are important but should be expanded to include conservation and heritage areas.
- It is not clear how big the zones would be. In any given neighbourhood there could be parts that are worthy of each three classifications. But if whole chunks of a borough are given one single classification it could become unsustainable, threaten the local environment and risk over-intensification.
- Priority should be given to the development of brownfield sites – i.e. land which is post-industrial or post-commercial (not existing residential developments). Zone-ing must support this approach, not detract from it.

Proposal 2: Development management policies established at national scale and an altered role for Local Plans.

- We need greater clarity as to what those rules will be and to what extent they can be influenced or adapted locally.
- The creation of top down rules will remove the need for local consultation.
- There is nothing wrong with a concept of ‘rules’ rather than policy. In some ways, it might help reduce unhelpful subjectivity and interpretation. But without knowing what the rules will be it is impossible to comment on whether this system will work.
- Rules must not be in the developers’ favour.
- Rules could tackle issues such as typology and tenure.
- There should be rules set minimum standards, eg, all sites must have 40% green space.

Proposal 4: A standard method for establishing housing requirement figures which ensures enough land is released in the areas where affordability is worst, to stop land supply being a barrier to enough homes being built. The housing requirement would factor in land constraints and opportunities to more effectively use land, including through densification where appropriate, to ensure that the land is identified in the most appropriate areas and housing targets are met.

- This could create huge problems in terms of the mix of properties. Particularly for those of us around London.
- Issues of land supply owing to environmental constraint including flooding and Green Belt should be factored in as part of the initial calculation for housing requirements to ensure housing targets reflect development constraints.



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- Because of our proximity to the capital, value of property is high. Yet, there is not much spare land. As a result, increasing supply in high-value areas, will invariably mean building up. This will destroy suburban character in and around London and other big cities.

Proposal 5: Areas identified as Growth areas (suitable for substantial development) would automatically be granted outline planning permission for the principle of development, while automatic approvals would also be available for pre-established development types in other areas suitable for building

- There is a huge potential for development creep with the automatic approval system and the potential impact of over intensification.
- Additional use of technology to pre-screen applications is welcome. However, there is no evidence that any form of permitted development leads to high quality property being built.
- The removal of human judgement could create huge problems.
- Automatic approval removes the opportunity for residents to have their say on individual consultations.
- Building control must be integrated into the planning system. Without it, automatic approvals could create dangers.

Proposal 6: Decision-making should be faster and more certain, with firm deadlines, and make greater use of digital technology

- We welcome the use of technology in decision making. However, we worry about the elimination of human involvement further into the process.
- Digital could be used to root out poor applications at submission stage.
- Digital tools could check issues such as play space, climate change issues, green space etc at submission.

Proposal 7: Local Plans should be visual and map-based, standardised, based on the latest digital technology, and supported by a new template.

- Local Plans need to be more accessible to the community. Residents should not be deterred from using their Local Plan because it is impenetrable. The use of more visuals and maps should be welcomed.

Proposal 9: Neighbourhood Plans should be retained as an important means of community input, and we will support communities to make better use of digital tools

- If neighbourhood plans are retained, they must give communities real control over the character and design quality of developments.
- There are concerns from the community as to the costs and bureaucracy incurred in developing a neighbourhood plan.

Proposal 10: A stronger emphasis on build out through planning

- This seems to be the thrust of the entire white paper. Therefore, all other considerations apply to this point.



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- It should also be noted that a huge number of consented applications have yet to be built. Is the planning system the main, or even the significant, barrier to house building?
- Should stalled schemes be incentivised before changing the whole planning process?
- Incentivise owners of brownfield sites to move more quickly by financially penalising inactivity severely enough to dissuade inactivity.
- Consented sites not developed within a timeframe should be subject to CPO.

Pillar Two – Planning for beautiful and sustainable places

Proposal 11: To make design expectations more visual and predictable, we will expect design guidance and codes to be prepared locally with community involvement, and ensure that codes are more binding on decisions about development.

- This sounds good in theory: but how will we ensure local involvement?
- Beauty is in the eye of the beholder – a very subjective matter.
- In the London Borough of Croydon, a local design guide has been produced. The Council believe that the community was consulted – however, applications are regularly approved against it and there is a widespread feeling that they are out of character.

Proposal 12: To support the transition to a planning system which is more visual and rooted in local preferences and character, we will set up a body to support the delivery of provably locally-popular design codes, and propose that each authority should have a chief officer for design and place-making.

- The approaches listed in the white paper to establishing local design codes feel quite central. There is a risk that an unwelcome ‘look and feel’ will be imposed on communities

Proposal 14: We intend to introduce a fast-track for beauty through changes to national policy and legislation, to incentivise and accelerate high quality development which reflects local character and preferences.

- Beauty is a welcome commitment but a subjective word. It is essential that local communities have real control over their character.

Proposal 15: We intend to amend the National Planning Policy Framework to ensure that it targets those areas where a reformed planning system can most effectively play a role in mitigating and adapting to climate change and maximising environmental benefits.

- At the heart of this must be the protection of green space. This must include gardens and trees. In Croydon too many green spaces are being lost to development. The Labour Council cause further affront to local residents by referring to these amenity spaces as ‘incidental’.
- There should be minimum quotas on sites for climate change measures, green space, number of trees etc.



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Proposal 17: Conserving and enhancing our historic buildings and areas in the 21st century.

- Greater protection to conservation areas, including in urban and suburban environments, must be considered.

Proposal 18: To complement our planning reforms, we will facilitate ambitious improvements in the energy efficiency standards for buildings to help deliver our world-leading commitment to net-zero by 2050.

- A greater emphasis must be given to tree and green space retention.

Pillar Three – Planning for infrastructure and connected places

Proposal 19: The Community Infrastructure Levy should be reformed to be charged as a fixed proportion of the development value above a threshold, with a mandatory nationally set rate or rates and the current system of planning obligations abolished.

- Infrastructure should be front loaded rather than levy after the event and then apply.
- Any changes to CIL must ensure that money is spent in the hyper-local area to mitigate the impact of the development and improve local infrastructure.

Proposal 20: The scope of the Infrastructure Levy could be extended to capture changes of use through permitted development rights

- Agreed as such PD can have an effect on local infrastructure.

Proposal 21: The reformed Infrastructure Levy should deliver affordable housing provision

- It is essential that both infrastructure and affordable housing receive the funds that they need. These proposals could see these priorities competing for the same funding. Separate funding should be maintained for affordable housing to ensure its delivery.

Proposal 22: More freedom could be given to local authorities over how they spend the Infrastructure Levy

- The above three proposals risk distorting the purpose of CIL, which should be to mitigate the impact of the development. It should not become a general money-spinner for local authorities.
- If CIL is allowed to support the General Fund of Local Authorities, then it may influence their decisions inappropriately.

Proposal 24: We will seek to strengthen enforcement powers and sanctions

- This is very welcome. The enforcement system must have real teeth to send a clear message to developers.
- Enforcement is weak in many Local Authorities, with varying degrees of interpretation.
- There should be standard levels of compliance.



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- Enforcement must have teeth, ideally as a deterrent.
- Enforcement should not simply lead to regularisation through retrospective planning applications.
- Retrospective Planning Applications should carry an element of punishment!

In conclusion we would once again commend the Government for their ambitious plans but would re-state that residents fear that some of these proposals will further reduce their ability to challenge planning at a local level. The experience in Croydon has tainted the planning system locally, we would hope that Government will modify its approach to ensure that trust may be restored.

We would be grateful if recognition could be given in any forthcoming legislation of the real battle which Conservatives have with the approach being taken by ideologically driven Labour Local Authorities, like Croydon, who have a clear agenda to concrete over our beautiful local character areas and change them forever.

Yours sincerely

Cllr. Jason Perry
Conservative Leader of the Opposition
London Borough of Croydon