

London Plan

Submission by Sean Creighton

Preface

1. This submission draws on my experience of:
 - (1) co-ordinating work on local economy and housing for Croydon Trades Union Council and the Croydon Assembly (CTUC/CA);
 - (2) giving evidence at the Whitgift Centre CPO Public Inquiry;
 - (3) membership of Love Norbury Residents Association partnership Planning Committee (LNPC);
 - (4) giving evidence for (1) and (3) at the Croydon Local Plan (Partial Review and the Examination Hearings.

and I am Chair of the Norbury Community Land Trust registered last June.

Mayor's Introduction

2. In his introduction the Mayor states that London faces 'another wave of growth, the likes of which we've not seen for a century. Our population is projected to increase by 70,000 every year, reaching 10.5 million in 2041. This means that just to meet demand, at least 66,000 new homes need to be built - along with space for tens of thousands of new jobs - every single year.' (page xiv)

3. I reject this acceptance that London should grow. The Mayor should be actively seeking to slow the growth of London because:

- (1) it is at the expense of other parts of the Country, sucking resources and people and over intensifying the capital and its region;
- (2) over development and over intensification of its inner city areas;
- (3) the uncontrollable nature of buy-to-let landlordism which distorts the housing market, and aggravates living conditions;
- (4) developers are not meeting the real needs of existing Londoners;
- (5) the increasing stress on infrastructure, for which there is already not enough funding;
- (6) the increases in the stresses on the working and residential lives of Londoners;
- (7) the threats to green spaces
- (8) the over stretching of energy and water resources.

4. Because the London Plan should be seeking to slow the growth of London I am opposed to the massive increase in housing units required, especially the doubling of the housing target for Croydon to 29,490 over ten years (Table 4.1. Policy H1 Increasing housing supply)

London's Tensions

5. When I worked as Policy Development Officer with the British Association of Settlements and Social Action Centres, the work carried out with its members and other London community

and voluntary sector organisations on the London Spatial Development Plan identified the following problems facing the growth strategy:

- (1) How to prevent the increasing social polarisation between very rich and the poor as the middle-classes increasingly move out.
 - (2) How to reduce commuting into London for work from further and further afield.
 - (3) How to ensure that there is affordable housing for the workers needed for public services, without them have to move out and become commuters back in.
 - (4) How to ensure that major regeneration projects positively benefit neighbouring communities.
6. The tensions have simply escalated and become more complex.
7. These problems are exacerbated by the inadequacies of the planning system. At the time of the Spatial Development Plan these were identified as:
- (1) commercial and economic interests riding roughshod over legitimate community and environmental concerns;
 - (2) developers and businesses from outside a local authority area parachuting in with proposals that have not been thought through in terms of their impact on the local area and community;
 - (3) the imbalance in rights meant that a lot of communities feel that proposals they are opposed to are forced upon them, and that their areas is changed bit by bit in a direction that they do not agree with;
 - (4) the community being the weakest player in the planning system;
 - (5) the limited rights to make representations;
 - (6) the lack of a right to put in a community appeal against a planning approval.
8. These inadequacies remain in existence today, and have been exacerbated by the planning freedoms and the presumption that applications will be approved.

Policy GG1 Building strong and inclusive communities

9. The intention of this Policy is welcome, but it is not achievable under a Growth strategy, as it is not possible to resolve all the contradictions and tensions that arise from growth that will damage the goals.
10. Para 1.2.1 states that ‘employment is expected to increase on average by 49,000 jobs each year, reaching 6.9 million over the same period. This rapid growth will bring many opportunities, but it will also lead to increasing and competing pressures on the use of space. To accommodate growth while protecting the Green Belt, and for this growth to happen in a way that improves the lives of existing and new Londoners, this Plan proposes more efficient uses of the city’s land.’
11. In Croydon there has been a massive loss of employment sites particularly because of the Government’s planning freedoms which allow the conversion of office blocks to residential without planning permission, and housing developers buying up sites to build new housing.

Policy GG2 Making the best use of land has some welcome goals, but in the real world where land use is driven by its values and by private developers it is not achievable.

12. The development of the Croydon Opportunity Area to-date has been driven by the private developers producing housing that does not meet the needs identified by the Council for existing Croydonians and their children.

13. The Council has admitted that there is an enormous funding gap in meeting the infrastructure needs created by the new multi-storey block developments.

14. The reference to surplus public sector land is ominous in that if and where it exists it should be developed to meet local needs not developer profits. Public land not under the control of local Councils should either be transferred to those councils or to community led housing and regeneration organisations for development.

15. Residents Associations in Croydon made it clear at the Croydon Local Plan examination that they are not against the intensification of land use as long as it complements or improves the character of the area. e.g. better use of accommodation over shops, raising single or double storey heights to 3 or 4 where these heights already exist in terracing.

16. Valuing existing places and strengthening London's distinct and varied character' can only be achieved if Councils are required to have Neighbourhood or District Forums of Councillors and the growing range of residents organisations, including Residents Associations Friends of Parks and Open Spaces, and special project groups, which can oversee the planning of the area.

17. In their evidence on the Croydon Local Plan (Partial Review) both Croydon TUC/CA and LNPC supported the goal of protecting open land, designated nature conservation sites and local spaces.

Policy GG3 Creating a healthy city to improve Londoners' health and reduce health inequalities

18. This is a very worthy policy. However, one of the growing problems in London is the stress caused by the effects of past and current growth, the growth in population due to the creation of small housing units in new developments, through conversion of houses, and through multiple occupation in the private rented sector. These cause increasing noise, parking competition, strains of travelling around London, and environmental decline through litter and fly-tipping. Collectively these reduce the quality of life and fuel negativity and helplessness.

19. Large numbers of residents consider they have no control over the change that happens, and that Councils do not listen to them. Croydon Council is driven by the obsession to meet existing housing targets and ensure that Section 106 and CiL are paid by developers. Further growth will add to these problems.

20. There needs to analysis of how the pressures of living in London, aggravated by high levels house prices and rents and low wages, are fuelling the rise in mental health problems.

21. Analysis is also needed to the extent to which the growing mental health problems of school pupils are fuelled by the Government curriculum and testing requirements and by the increasing lack of space many families now live in. e.g. no quiet area for homework.

22. In relation to older people, the increase in loneliness and the costs of living in accommodation larger than they now need, is aggravated by fear of what will happen to them when they can no longer live in their property but cannot find suitable smaller accommodation in the same area.

Policy GG4 Delivering the homes Londoners need

23. This is not achievable unless:

- (1) there is an end to the link between ‘affordable’ rents and private rents;
- (2) rent controls are introduced to ensure ‘genuine’ affordability;
- (3) minimum space standards are increased;
- (4) homes are for rent or purchase not for profit and investment;
- (5) the activities of buy-to-let landlords are controlled;
- (6) the penalties for providing poor and overcrowded homes by private landlords are made much tougher through every Borough having a landlord licence scheme, as does Croydon.

Policy GG4 E. Establish ambitious and achievable build-out rates at the planning stage, incentivising build-out milestones to help ensure that homes are built quickly and to reduce the likelihood of permissions being sought to sell land on at a higher value.

24. This is imperative if developers are not to land bank or sell-on with planning permissions to make a profit without the housing being built.

Policy GG5 Growing a good economy

25. London’s global economic competitiveness has been largely built on the financial institutions which did enormous damage to the national and London economies in their role in the 2008 crash. Most Londoners did not share the profits that the financial institutions made, and continue to make. The bonuses of traders led to large rises in house prices, and encouraged developers to build for British and international investors leaving a large number of housing units empty as investments while thousands of Londoners live in inadequate housing, or have experience homelessness.

26. Section C of this Policy to plan ‘for sufficient employment and industrial space in the right locations’ is absolutely essential, given the experience in Croydon, and requires the Plan to have a blanket safeguard on all existing employment sites.

27. In Norbury the latest examples of loss are:

- (1) the approved planning permission to demolish 32-24 Fairview Rd and build a poorly designed housing overdevelopment which threatens the neighbouring medical practice;
- (2) the proposed plan to demolish the Norbury Trading Estate and build a predominantly housing scheme.

28. These sites are no longer available for conversion to small, affordable workspace units for the growing number of small businesses among residents and small companies wanting to move into Croydon. During the Croydon Local Plan consultation and public examination:

- (1) the CTUC/CA urged a more robust policy to protect employment sites;
- (2) the LNPC urged the Council to safeguard these two sites through the Plan and Article 4 Determination.

29. The Council refused to take such action, setting the scene for the loss of the two sites.

30. Section F of this Policy to ‘(P)romote and support London’s rich heritage and cultural assets, and its role as a 24-hour city’ is only partially acceptable. See para. below.

31. Section G of this Policy G to maximise 'London's existing and future public transport, walking and cycling network, as well as its network of town centres, to support agglomeration and economic activity' is not achievable in many parts of London. See paras. ??? below

Policy SDI Opportunity Areas

32. Section 5 of this Policy seeks to 'ensure that Opportunity Areas maximise the delivery of affordable housing and create mixed and inclusive communities.'

33. In the Croydon Opportunity Area most of the new housing is studio to two bedroom. Croydon Council is accepting that 2 bed 4 person apartments are family units. This ignores the need for life-time changes in families e.g. the need for separate bedrooms when a brother and sister reach a certain age, and the need for quiet space to do homework.

34. The new housing in the Opportunity Area is mainly in tower blocks. It has been well known since the 1960s that such buildings are unsuitable for families. Therefore Croydon has been unable to have delivered through its planning approvals either genuinely affordable housing or mixed and inclusive communities.

35. The new London Plan cannot ensure delivery of this part of the Goal, unless it prevents the further building of tower blocks, unless balanced by lower rise developments which are family friendly.

36. In my objection to the revised planning application to the Whitgift Centre redevelopment I argued that the proposed tower blocks should be spread across the top of the new shop centre, thereby spreading the residents across the scheme, and having a considerably lower number of storeys. The Council did not accept this proposal. I had made it previously and clearly the developer had also rejected the idea. My requests to have discussion with the developer have been ignored.

Policy SD7 Town centre network

37. Section E of this Policy discusses the need for the focus in district centres 'on the consolidation of a viable range of functions, particularly convenience retailing, leisure, local employment and workspace', etc.

38. Norbury is a District Centre along London Rd. In its evidence to the Croydon Local Plan (Partial Review) the LNPC accepted that there is scope for this approach. However, I have already pointed out in paras 7 & 8 how the Council has undermined the ability to achieve this.

39. Because it is the residents who understand the way in which District Centres are being changed by commercial landlords, developers, buy-to-let- landlords, the local community in District Centres must be involved in planning changes through a District or Neighbourhood Forum with the Council, TfL, transport operators, and local businesses.

40. A step in this direction is due to take place between the Norbury Councillors and LN and other local organisation on a voluntary basis, supported by a Council policy for devolution. However that policy could be reversed in the future as it is not based on a legislative foundation.

41. The Love Norbury Transport Committee is in discussion with the area Station Manager about the run down nature of Norbury Station and its linked estate. Regeneration of the Station is a key to carefully managed development and intensification of the District Centre. It is clear that unless Network Rail is provide with funding nothing will happen

42. The concept of detailed development plans as outlined for town centres in Policy SD8 (Town centres: development principles and

Development Plan Documents) should be required for District Centres. In relation to Croydon and Norbury these would go into more detail than the overview approach in the newly adopted Croydon Local Plan. The characteristics described in it for example of Norbury were changed in the light of some of the comments of LNPC to strengthen the description.

43. Similarly the concepts in Policy SD9 (Town centres: Local partnerships and implementation) should be applied in District Centres).

Policy D1 London's form and characteristics

44. The design aims are welcome, especially the stress on the importance of green spaces, given the way in which Croydon Council's Brick by Brick developer is seeking to build on such spaces e.g. Coombe/Edridge Rds, next to a listed building Ruskin House, which is opposed by Croydon TUC and Croydon Assembly because small green spaces are important to the character and amenity of neighbourhoods.

Policy D4 Housing quality and standards

45. The current minimum standards are what many new housing units are being built to, while developers converting office blocks to residential without planning permission, are producing units lower than these minimum standards. As a result new homes being built are not large or flexible enough to be adapted as life requirements changed. There should be a return to the former Parker Morris standards as a minimum.

Policy H2 Small sites

46. The '(L)oss of existing biodiversity or green space, as a result of small housing developments' is unacceptable in Para 4.2.9.

47. The 'provision of landscaping that facilitates sustainable urban drainage' and of '(R)ainwater attenuation features to achieve greenfield run off rates' in Para 4.2.9 is essential, particularly in Norbury where the hills create run off and flooding problems.

48. The proposed 'off-site provision such as new street trees in order to achieve the principle of no net loss of overall green cover' in para 4.2.9. is not acceptable. Street trees should be provided to add to overall green cover and to help tackle air pollution.

49. Action by the Mayor is urgently needed to prevent the continued loss of tree cover, and green links along railway tracks, as a result of Network Rail's continued cutting down of trees.

50. As Chair of Norbury Community Land Trust I welcome the recognition in para 4.2.10 that '(S)mall sites can be particularly suitable for well-designed community-led housing projects' and 'Boroughs should support such projects where these developments are integrated with existing neighbourhoods and support mixed and inclusive communities. Croydon Council approved a report on 26 February which will support such activity in the Borough. Prior to the finalisation of the report I had a useful meeting with the Leader of the Council who had chaired the Commission on Community Led Housing, and a Commission member spoke at the Trust's launch meeting on 19 February.

Policy H10 Redevelopment of existing housing and estate Regeneration

51. Given the concerns about the way in which Croydon's Brick by Brick Company is proposing additional housing on Council estates against the wishes of residents, the Croydon Assembly supports the need for a requirement that any schemes to estates should be subject to a ballot of residents.

Policy H12 Housing size mix

52. The statement in Para 4.12.3 that ‘as many families do live in two bedroom units this should be taken into account when assessing the needs that different sized units can meet (in terms of bedrooms) and the design and approach to management of a development both for market and affordable housing’ is flawed.

53. A family of two adults and two children in a two bedroom unit, even if built to the now suggested minimum space standards, is cramped and does not allow for separate bedrooms for the children as they grow up or develop health problems, and ensure a quiet area for homework. If the homes are in blocks there may be inadequate provision of garden/amenity space in which children can play safely.

54. The recognition in para 4.12.7 that the quality of Houses in multiple occupation (HMOs) gives rise to concern is welcome, it is very disappointing that there is no robust set of policies to ensure action to improve the quality, to improve the role of Councils to increase their role to achieve either quality improvements or to compulsory purchase them and pass them to a social housing or community led housing provider. Poor quality fuels homelessness and the need for more social housing. If a tenant is helped because of the latter all it does is create a vacancy for a new letting and further demand on the Council.

Policy S1 Developing London’s social infrastructure

55. LNPC is particularly concerned about the decrease in social infrastructure with its detrimental effect. In the last four years, for example, in Norbury, we have lost the Semley Rd dance studio in favour of housing, without a replacement. The Council failed to protect it from development.

56. Across Croydon campaigns have failed to persuade the Council to protect pubs supported by their local communities. In the Croydon Local Plan the Council now sets out policies to try and protect them which is welcome, but only time will tell in relation to new applications and the result of any appeals against planning permission. The ACV route is now being explored, and one pub has now been given ACV status. The London Plan should have a more robust set of provisions to ensure protection.

Policy S3 Education and childcare facilities

57. As a Governor of a primary school, and having in the past been a Clerk to several Governing Bodies, I am disappointed that this Policy does not include a moratorium on building on school playing fields.

Policy E1 Offices

Policy E2 Low-cost business space

Policy E3 Affordable workspace

58. In their evidence submitted to the Croydon Local Plan consultation and examination CTUC/CA argued for the need for lower cost, affordable small workspaces at affordable rents. This need was also recognised by the Croydon Small Business Commission. See also paras. 7 & 8 above.

Policy E8 Sector growth opportunities and clusters

59. In its assessment of the Croydon Growth Plan in 2014 and in its submission on the Croydon Local Plan (Partial Revision) CTUC argued for the development of a diverse economy, not largely dependent on office, retail and leisure, including green and IT jobs.

Policy HC1 Heritage conservation and growth

60. As a historian and member of the Croydon Local Studies Forum I welcome this policy is welcome as a strong reminder to Councils. In the consultation on the Croydon Local Plan (Partial Review) the Council did admit that it had not done enough to protect the historic environment. However, there is a difference between policy and decision making. The Croydon College building which adds to the attractiveness of the Town Centre is being demolished as part of the Councils' development of its Cultural Quarter. Heritage England decided that the quality of the architecture was not sufficient to warrant listing. While Ruskin House is a listed building its setting is being comprised by the housing scheme proposed on the green space next to it by the Council's Brick by Brick company.

Policy HC6 Supporting the night-time economy

61. The concept of a 24 hour city consigns large numbers of Londoners:

- (1) to having to work anti-social hours;
- (2) to minimum wages in the restaurant and bar industries;
- (3) to continue to be cheated out of service charges by their employers;
- (4) adds to the problems of getting to and from work;
- (5) disrupted family life due to shift systems;

62. Bearing in mind that health and well-being need to be underpinned by an average of eight hours uninterrupted sleep, the main the benefit of a 24 hour city economy is the drinkers of alcohol, with:

- (1) an increase in night-time/early hours noise of vehicles, buses, trams and trains needed to have mobility in a 24 hour city;
- (2) disruption of sleep patterns pf those whose homes are along main roads, and tram and train lines;
- (3) increases in alcohol fuelled anti-social behaviour.

63. The effects are therefore discriminatory against:

- (1) all Londoners who do not have the time or the money to take part of the 24-hour economy;
- (2) the growing number of Londoners who for religious or other reasons are teetotal and abstainers;

64. I note that Norbury District Centre is classified as NT3, an area with more than local significance Pages 481-2). This will be of considerable concern to local residents.

Policy G2 London's Green Belt

61. The CTUC/CA supported the protection of the Green Belt on the evidence on the Croydon Local Plan (Partial Rview).

Policy G4 Local green and open space

65. This is welcome. In their evidence on the Croydon Local Plan (Partial Review) and examination CTUC/CA and LNPC supported the Councils's proposed inclusion of a Designated List of Local Green Spaces.

66. The Planning Inspector undermined the Council's wish to include a Designated List of Local Green Spaces because the Council had not shown how each space on the proposed list met the national criteria. Evidence was submitted e.g. by LNPC on some of the spaces showing how they met the criteria, but the Inspector would not reach a compromise. When I asked the Secretary of State to require the Council to add in a Designated list, I was informed that he did not have the power to do so.

Policy G7 Trees and woodlands

67. LNPC has been very concerned about the way in which clusters of trees can be chopped down by owners and developers where there are no tree protection orders. This has occurred on Pollards Hill. As well as reducing greenness and amenity, or has increased water run-off and flooding down the hill. The Plan needs to address the issue of giving such clusters protection.

Policy SI11 Hydraulic fracturing (Fracking)

68. CTUC/CA are opposed to fracking.

Policy T5 Cycling

69. It is not possible, for example, to have a continuous cycle lane along London Road from Norbury to West Croydon because the road is not wide enough, given the existing bus lanes, the heavy traffic congestion, and the need for more buses.

70. If the aspiration for a great increase in the number of people cycling is to be achieved, action is needed to deal with the potential risks. Large number of cyclists ride their bikes without consideration to vehicle drivers and pedestrians e.g. riding on pavements, not wearing luminous clothing, inadequate front and rear lights, riding through red lights, weaving among vehicles often not been seen by drivers because of blind spots in their mirrors' read views. The Mayor should campaign for the introduction of licences for cycles and other two wheel vehicles, and compulsory training in road use, repair and the Highway Code.

Policy T8 Aviation

71. As a former resident of Wandsworth near the flight path to Heathrow, and given the experience of my mother under the flight path to Heathrow in Fulham, I welcome the Mayor's opposition to any expansion of Heathrow. However, I am opposed to expansion at Gatwick, as was CTUC in its commentary of the Croydon Growth Plan (2014).

Sean Creighton

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