

A City for All Londoners

Croydon Council's response to the
Mayor of London's consultation

Contents

INTRODUCTION.....	3
Croydon's priorities.....	4
Opportunity and fairness	4
Growth and development	4
Devolution to communities	5
RESPONDING TO THE MAYOR'S VISION	6
PART 1: ACCOMMODATING GROWTH.....	6
Growth demands.....	6
Land use	6
Investment corridors.....	7
Good growth.....	8
PART 2: HOUSING.....	9
Tackling homelessness	9
Delivery of new homes	9
Private rented sector	10
PART 3: ECONOMY	11
Infrastructure investment.....	11
Digital inclusion	11
Inclusive growth	12
Skills and employment	12
Night time economy.....	13
Local business	13
PART 4: ENVIRONMENT, TRANSPORT AND PUBLIC SPACE	15
Air quality	15
Resource efficiency	16
Good design.....	16
PART 5: A CITY FOR ALL LONDONERS	17
Active citizens	17
Health inequality.....	18
Policing, security and justice	19
Culture.....	20

Introduction

Croydon Council welcomes the Mayor of London's new vision for the capital, "A City for All Londoners", and the ambitious direction of travel it sets out. The Council recognises the complex challenges facing the capital and the considerable opportunities for inclusive growth. As a diverse and growing borough, and the economic powerhouse of South London, the Council believes Croydon has a significant role to play in the future prosperity of London.

The Council is keen to work with the Mayor and the wider GLA family to ensure that the borough can achieve its full potential as a major economic centre in London, part of a thriving South London sub-region and the gateway to the vibrant Coast to Capital region in the wider South East.

With the UK's fastest growing economy, Croydon is undergoing significant redevelopment and regeneration which will culminate in thousands of new jobs and homes for local people. As London's growth borough, Croydon is becoming a key hub for tech, culture and development within the capital and is ensuring that culture is at the heart of the borough's bold regeneration plans.

The recently opened Boxpark Croydon, creation of a new cultural quarter which includes the £30m refurbishment of Fairfield Halls, and Croydon Partnership's £1.4bn redevelopment of the Whitgift Centre into a world class shopping and leisure facility are exciting signs of the emerging diverse cultural offerings for residents and visitors alike.

With Growth Zone status focused around Croydon's Opportunity Area, Croydon is the only London Borough that has secured such an innovative, transformative agreement aimed at delivering local term and sustainable benefits to residents. With confidence in the wider impact that can be achieved by accelerating our £5.25bn regeneration programme, the Government has recognised the potential of the Growth zone with a £7m revenue grant to fund the early stages. The investment delivered through the Growth Zone will enable major regeneration benefits, including:

- 23,594 new jobs with further 5,097 jobs created during the construction phase
- at least 10,000 new homes
- the wholesale renewal of the retail core

The scale of growth is benefitting the whole borough, beyond boosting the local economy and bringing jobs, affordable housing and better transport across Croydon. As a primary business, retail and leisure destination, Croydon is also a major contributor of labour and skills to the wider London economy and it is imperative that, as the Mayor develops more detailed strategies to deliver his vision, Croydon's status as an important strategic location for business activity, culture and transport infrastructure is maintained.

In shaping its response to the Mayor's new vision for London, the Council has considered the policy proposals set out in "A City for All Londoners" from the perspective of its existing strategic priorities and its emerging Local Plan.

Croydon's priorities

The Council's priorities reflect the borough's bold ambitions for inclusive growth and the Council welcomes the opportunity to work with the Mayor to ensure that Croydon and London as a whole are able to respond to complex common challenges. Over the next three years, progress towards Croydon's long-term vision will be shaped by the objectives set out in the Council's 'Ambitious for Croydon' strategic framework. This aims 'to achieve a stronger, fairer borough where no community is held back'. To do this, the Council has identified three corporate priorities:

- Growth - creating growth in our economy;
- Independence - helping residents to be as independent as possible;
- Liveability - creating a welcoming, pleasant place in which local people want to live.

The Government has reduced grant funding for local authorities over recent years and, in common with many other authorities, Croydon has experienced an unprecedented 43.5% cumulative reduction in government funding up to 2015/16 in cash terms, equating to 54% in real terms. The support of people and other organisations in the borough and across regional and sub-regional partnerships will be critical in managing these changes to deliver the Ambitious for Croydon agenda. The Council welcomes the priorities set out in the Mayor's vision for London and considers that collaboration between the Mayor and London boroughs will enable the capital to deliver an ambitious and inclusive growth agenda.

Opportunity and fairness

Croydon is a growing borough whose diverse community brings great social and economic benefits to the borough, but makes it all the more important to work to strengthen community cohesion and advance opportunity and fairness. The Council's challenge is to support the development of inclusive communities that are dynamic, connected and fair, where people are not divided by differences but recognise the benefits of diversity. Connection through shared common goals and aspirations is key to the strength of Croydon's communities. Similarly, the Council believes that embedding opportunity and fairness at the heart of London's growth agenda is imperative and it fully supports the Mayor's aspirations to ensure that prosperity, culture and economic growth is shared by all Londoners

Growth and development

Croydon is in the midst of major change with the potential to re-create itself as a vibrant, inclusive and modern European city, securing its position as the economic powerhouse of the region, and connecting London's Central Activity Zone with the South East of England. The signs of investment in the borough are plain to see from the new residential towers of Saffron and Ruskin Squares, to the plans for the Taberner House site and the new Cultural Quarter. Driving this renewed interest is the decision by Westfield/Hammerson to create one of Europe's largest shopping

and retail destinations through the redevelopment of the Whitgift Shopping Centre which will provide 5,000 new jobs and up to 600 new homes.

Croydon's Growth Plan sets out the Council's ambitions for the borough. It comprises of the guiding principles for growth, an outline of key strategic sites, an investment vehicle to finance planned growth and a five-year delivery plan to ensure activity is planned and co-ordinated to minimise any adverse effects of development for residents and businesses. In particular the Council is committed to accelerating home building to achieve 9,500 starts in 5 years (from 2013 to 2018) and building more affordable homes. Croydon's Growth Zone proposals will support delivery of its £5.25bn regeneration programme, creating thousands of new jobs and homes for local people. In all of these areas, the Council is taking a very active and expanding role, be it in terms of delivery, partnership or proactive co-ordination. The Council welcomes the opportunity to work with the Mayor and wider GLA to support growth in the borough and across the wider sub-region.

Devolution to communities

The Council welcomes the Mayor's commitment to seeking a strong devolution package from the Government along the lines of the devolution deal offered to Greater Manchester. The Council supports the view that devolution must be primarily to the boroughs, with the Mayor playing a strategic and co-ordinating role and passing the extra powers he obtains to local authorities. The Council welcomes the opportunity to enhance existing working relationships with the Mayor and wider GLA family at both political and officer level.

Through the Council's work with local communities and our understanding of best practice, it is acknowledged that local implementation needs to be informed by what is important to local residents and stakeholders. Without the opportunity for local communities to help shape and 'buy into' projects and services on the ground, the probability of success for those interventions is significantly lower. As a result, in the same way that outcomes were significantly improved by shaping services around individuals and families in the Council's gateway and welfare model, the Council is currently developing a similar approach to communities.

The Council is establishing three pilots in South Norwood, Purley and New Addington, to further enhance opportunities to enable local community engagement and involvement¹. This will provide a powerful community voice in the strategic development of the area and a point of co-ordination for local groups and initiatives.

¹ Further details on the Council's community devolution plans are available in the November 2016 Cabinet report: <https://secure.croydon.gov.uk/akscroydon/users/public/admin/kabatt.pl?cmte=CAB&meet=52&href=/akscroydon/images/att8110.pdf>

Responding to the Mayor's Vision

The Council welcomes the consultation on the Mayor's Vision. In shaping its response, the Council has been mindful of how local priorities, highlighted in the introduction section, can support the Mayor to deliver his ambitions whilst also recognising the opportunity to align policy in key areas over the longer term.

The Council is broadly supportive of the Mayor's vision and the positions set out in "A City for all Londoners" but is mindful that the detailed strategies to follow provide further scope to refine shared priorities and positions. Accordingly, where the Council feels it would be useful to ensure that these emerging strategies include specific detail, it has highlighted opportunities for clarification and for areas of development.

Part 1: Accommodating Growth

Growth demands

As set out in the Mayor's vision, the Council acknowledges that 'experts say we [London] will need to identify land in the capital to build at least 50,000 homes every year between now and 2041'. It is therefore essential that the London Plan Review very clearly sets out the Mayor's housing target for London and for each borough. It is crucial that all boroughs are required to make considerable contributions to London's growth and that the final targets should be arrived at in consultation with the boroughs.

The Council agrees that London's projected population growth of 70,000 per year to reach 10.5 million by 2041 is a key challenge for the capital and its constituent boroughs. In Croydon's view, what is essential is that all boroughs contribute to meeting London's growth, and that there is evidenced and proportionate parity regarding the distribution of London's housing growth. Balancing the tensions between pressure on land, housing, transport and the environment should be a shared challenge across the capital.

'Bold measures' are indeed needed to meet as much as possible of the growth demands within London. The proposal to intensify development across the capital, and significantly in well-connected locations or areas with planned transport capacity, represents sound planning principles. The Council's current and emerging Local Plan supports the Mayor's objective to intensify housing development around stations and well-connected town centres. For example, Croydon's Opportunity Area is planned to accommodate a third of the borough's growth over the next 20 years.

Land use

The Council supports the principle that accommodating growth will be in the context of protecting London's Green Belt and other designated green spaces. Croydon's current and emerging Local Plan also protects the borough's Green Belt and Metropolitan Open Land. The Council also supports the protection of London's (and therefore Croydon's) most valued employment land. It is right to strike the balance between accommodating housing and supporting employment and economic growth. However, the Council does, and will continue to, explore and support how housing and industrial / commercial development can co-exist in certain locations. To this

end, Croydon's emerging Local Plan allows for transition areas of residential and commercial on the fringes of industrial locations.

In its emerging Local Plan, the Council is already supporting the Mayor's desire to see more smaller-scale housing development in appropriate suburban locations. This form of development needs to be accommodated if London is going to make real strides to meet its needs. Through the London Plan review, the Council asks the Mayor to be explicit about support for this form of development as it can represent some of the most contentious for local communities. The Council is currently facing this challenge, having proposed such development opportunities in our emerging Local Plan. The Council is of the view that the potential benefits of such development should be explained and promoted, for example, the way in which intensification of development can lead to greater bus use and support the business case for enhanced services.

Investment corridors

The proposed joint infrastructure investment corridors (where infrastructure is planned to open up housing and other development) that stretch out beyond London's borders should certainly be explored, as should the role of London within the wider hinterland of the south east. In particular Croydon's unique position and role as the capital of South London, with its linkages with Gatwick and beyond, through the Brighton Mainline should be identified to properly plan for growth and infrastructure investment. However, it should be clear that the receipt of investment is predicated on those authorities that are willing to accommodate the greatest growth. London boroughs have long recognised the interdependencies between the capital and the wider South East region and already have effective partnerships with local authorities extending beyond the borders of the capital.

As a member of the Coast to Capital LEP, Croydon is part of a strong collaboration between the private, public and education sectors across a diverse area which also includes East Surrey, Gatwick Diamond, Brighton & Hove, Lewes and West Sussex. The Council encourages the Mayor to work with London boroughs to enhance these existing partnerships and to ensure that a coherent case is made to Government in respect of issues of interest across the wider region.

With this in mind, the Council is disappointed that the Mayor's vision includes no reference to the Brighton Mainline capacity upgrade, which is vital to the sustainable and economic growth of South London and the Coast to Capital region. The Council calls on the Mayor to join the business community and residents along the Brighton Mainline who have joined together to urge Government to swiftly progress work on upgrade proposals to improve rail infrastructure, capacity, resilience, and the quality of services from the South Coast into London. The Council is of the view that the Brighton Main Line Upgrade project is one of the most important single interventions able to provide a step-change boost to the economy of this important region, which can support the Mayor's ambitions for inclusive growth across the capital.

The Council is very supportive of the devolution of suburban rail services to the Mayor and will continue to show its support for this as has been the case publicly to date.

Good growth

The Council notes the priority for 'good growth', but considers that this needs to be clearly described in the London Plan review to ensure it is applied in a positive manner. The Council is concerned that without a detailed definition, the underlying considerations could be interpreted as constraints rather than as principles to enable holistic growth.

The Mayor's pledge to prioritise culture as a key component for 'good growth' is paralleled by the Council's commitment to grow a thriving and lively cultural offer which engages communities and supports regeneration. Croydon is undergoing a period of unprecedented change and population growth and the role of culture in ensuring the success of regeneration is an important element of the Council's Growth strategy for development; Croydon needs more than increased and enhanced retail provision, providing both balance and alternatives. The regeneration of Fairfield Halls and College Green will deliver a fully refurbished world class cultural venue in the middle of a new high quality public space, forming the heart of the offer in the longer term.

Culture will play a role in other regeneration sites, helping to improve people's experience of the redeveloped public areas; supporting elements of design or creating footfall and activity. A strong and active cultural sector encourages the growth of creative industries bringing high value employment and is a factor in encouraging inward investment. The Council supports the proposed cultural infrastructure plan and welcomes the opportunity to contribute to its development, ensuring that the Plan is London-wide and reflects the needs of Croydon, given the population growth expected and scale of regeneration planned for in the Borough.

The Mayor's objective to see the delivery of infrastructure for people and communities is of course supported. The Council will continue to deliver itself and work with partners to ensure a strategic local approach to social infrastructure, applying our Local Plan policy to protect community facilities. It is important that the London Plan review acknowledges that community infrastructure, such as secondary schools, can be land hungry and the Council considers that the review should enable the pragmatic application of policy, where and when justified.

In terms of increased transport capacity, the Council welcomes the commitment to the Bakerloo Line Extension. However, it must be stressed that the Croydon Opportunity Area/Growth Zone remains an obvious start/finish if other areas in South London continue to resist the extension.

Part 2: Housing

The Council acknowledges the housing challenge in London, the symptoms of which have been experienced locally with a significant increase in the number of statutorily homeless households over the past five years. Understandably, housing is a top priority for Croydon's residents and the Council. Our Local Plan will enable delivery of some 20,000 new homes by 2031, 50% of them affordable. 9,500 homes will be started over the next five years, providing a choice of housing for people at all stages of life. The Council has set up a Revolving Investment Fund and a development company, Brick by Brick, to deliver up to 4,000 homes across a range of tenures.

The Council welcomes the opportunity to work in partnership with the Mayor, GLA other London boroughs, housing associations and the development industry to build on its innovative approaches to addressing the housing challenge.

Tackling homelessness

The Council welcomes the Mayor's recognition of the impact that the capital's housing challenge on levels of homelessness across London and, in particular, the challenge for local authorities. The Council has been working with other London boroughs to restrain the rising cost of procuring emergency accommodation for homeless people by negotiating a standard rate across London and is encouraged by the Mayor's support for pan-London approaches.

In tackling the wider context, the Council has developed an innovative Gateway Service which delivers tailored and specialised multi-agency preventative work. To date 1,100 families most severely affected by welfare reform have been helped to avoid homelessness, 5,400 people enabled to become more financially independent and 637 supported into employment. The Council is of the view that it is these types of locally developed, bespoke, partnership approaches that genuinely work to address the multi-faceted challenges facing some of London's most vulnerable families and asks the Mayor to join with boroughs to ensure more locally informed provision through further devolution of skills and employment support programmes.

Delivery of new homes

The Council welcomes the recognition that '270,000 homes in London have been granted planning permission but have not yet been built - last year alone nearly 70,000 new homes were approved – and only around half the homes that Londoners need have actually been delivered in recent years'. The Council are happy to work with the Mayor on possible interventions and incentives to ensure planning permissions that are deliverable and realistic are convert to completions and for the GLA to take a clear lead in its Stage one and two responses in respect of developments that are unviable or undeliverable, so that LPAs have more scope to refuse applications that are purely about increasing land value.

The intention to offer a 'variety of affordable housing types – low-cost rented, the London Living Rent and shared ownership – working towards a target of 50 per cent of new homes in the capital being affordable' is broadly supported. However, it is important that the Mayor's more detailed documents ensure initial focus is on affordable housing products, which may well be more widely defined compared to

now, meeting the needs of those in greatest need to offer opportunity and ease the pressure on boroughs' housing resources and budgets.

That said, the Council does support and seeks to deliver mixed and balanced communities through the supply of market housing and housing for middle earners, particularly for rent. To this end the Council supports the London Living Rent approach, which we understand will be set at no more than one third of the local average household income.

The Council is also disappointed that the Mayor has not addressed the potential of community led housing to respond to the housing challenge and deliver growth in affordable homes. The Council is of the view that we need new approaches involving community resources and commitment as part of the solution. Croydon is currently leading the Cooperative Councils Innovation Network Housing Commission which is exploring how to encourage and enable local authorities to support co-operative and community-led solutions to the housing crisis.

There is significant potential for this approach to support development of small sites and to return properties to use that larger organisations find uneconomic or problematic, whilst providing a way of managing local concerns over new residential development through active participation. Furthermore, such schemes often allow denser development, because of their approach to shared and communal space, and act to strengthen communities whilst guaranteeing that new homes are affordable in perpetuity. The Council calls on the Mayor to demonstrate his support and commitment to community led housing as part of a blended solution to the housing challenge in the capital.

Private rented sector

It is right for the Mayor to acknowledge the increased interest and proposed delivery of 'build to rent' developments. The Council supports the Mayor's intention to ensure planning policies understand the financial structure of this product to ensure developments are high quality and make a positive contribution to housing land supply and their environment and location.

As part of its drive to make Croydon a better place to rent, the Council has designated the borough a private rented property license area. Private renting has increased significantly in Croydon recently, with negative consequences including antisocial behaviour and poor-quality homes. Too often the Council has found that there are a small minority of private landlords whose failure to act damages communities and brings the wider sector into disrepute. Croydon is aiming to drive up housing standards in the private rented sector and protect tenants from poor landlord practice, and the Council welcomes the Mayor's support for such schemes.

Part 3: Economy

The Council has ambitious plans for economic growth and, according to latest research, the borough is already on track as the UK's fastest growing economy with annual GVA growth of 9.3%. Having recently held an Economic Summit, at which the Council welcomed the Mayor as our keynote speaker, it is clear that the partners across Croydon also take its growth potential seriously. Croydon benefits from outstanding transport connections, with London Victoria, London Bridge, the City, and Gatwick Airport within 15 minutes by rail which give it a competitive edge in attracting inward investment. As the single largest office market outside Central London with 7.9 million ft² of office stock, it is home to a number of international business clusters including Financial Services, Insurance, Engineering, Digital & Tech, and Government.

The London Plan review should continue with its support and designation of Croydon as the office and retail capital of South London. This is the basis of the Opportunity Area, the considerable growth planned in the current and emerging Local Plan, the Croydon Growth Zone and the developments that are occurring and proposed, including the redevelopment of the Whitgift by the Croydon Partnership.

Infrastructure investment

Croydon has secured significant investment in its Growth Zone, which will see more than 23,000 new jobs created, 9,500 new homes delivered and a new cultural quarter developed over the next 5 years. The Council is already working with partners and stakeholders to achieve the necessary infrastructure improvements and welcomes the support of the Mayor and GLA to ensure delivery. The Council has already invested in major public realm improvements in the metropolitan and district centres through the 'Connected Croydon' programme. The Council supports the Mayor's ambition to develop a strategic investment programme for the capital and will work with the Mayor to secure further funding for strategic infrastructure projects.

The Council also completely supports the Mayor in terms of aviation policy that 'the answer is additional runway capacity at Gatwick, which can be built quicker, cheaper and without the years of legal and political battles that Heathrow clearly faces'. The Council are clear that such additional runway capacity at Gatwick will support Croydon further as an economic driver in London and the capital of South London. This is particularly linked to the excellent connections between Croydon and Gatwick.

Digital inclusion

The Council has undertaken a holistic approach to the provision of digital services aiming to maximise digital inclusion and ensure those unable to access digital services were not left behind. The Council has sought to support and develop capacity in the community through digital skills, connectivity and accessibility. In particular, the Council welcomes the Mayor's commitment to digital inclusion. The GO ON Croydon digital inclusion program, which has just concluded delivery, was the first such program in London bringing together the UK digital skills charity and a number of their partners from across private, public and voluntary sectors to Croydon to promote and develop basic digital skills. The Council and its partners intend to

continue the commitment beyond the initial programme to ensure a diverse and responsive ongoing offer to local people.

Digital infrastructure is also key to a successful, modern London. The Council will work with the Mayor and providers to reduce Croydon's significant 'not spots' to ensure all residents and small and medium sized enterprises (SMEs) have access to broadband and Wi-Fi. The Growth Zone includes a workstream to improve the connectivity across the Borough and the Council welcomes the support of the Mayor to aid delivery.

Inclusive growth

As set out in the introduction section, Croydon's vision for growth is inclusive. Opportunity and fairness are at the heart of the Council's growth plans and the Mayor's ambition to ensure that all Londoners are able to share in the success of the city is strongly endorsed. As a London Living Wage borough, the Council welcomes the Mayor's commitment to continued promotion of this important movement as a tool to work with the business community to tackle in-work poverty. The Council has taken this approach further through introduction of a Good Employer Charter which aims to boost the local economy through support to the local supply chain, creation of job opportunities and ensuring employees are paid a fair wage. The key principles of our charter are:

- Paying a fair wage
- Undertaking fair and open recruitment practices
- Being mindful and supportive of employee wellbeing
- Investing in the local community
- Being conscious of the impact on surroundings and the environment
- Actively seeking opportunities to support local priorities, initiatives and campaigns

The Council is of the view that this type of local approach can benefit business and the wider community, and would welcome the opportunity to share its good practice with the new Economic Fairness Team at City Hall.

Skills and employment

The Council endorses the Mayor's commitment to ensuring a strong devolution package around adult skills. For Croydon it is essential that local people have access to skills for a modern hi-tech economy and the growth business sectors in the borough. The Council has a strong adult skills offer through its CALAT service and the local FE colleges within the borough. Through subcontracting Adult Learning, the Council plans to create a financially sustainable model which provides a clear pathway for learners in line with local priorities. The Council has also entered a partnership with the University of Sussex to expand higher education in the borough and raise the number of residents with degree-level qualifications. We look forward to working with the Mayor to ensure solutions are tailored to local needs and delivered through local providers to maximise impact for residents.

To better support inclusive growth, Croydon calls on the Mayor to support further devolution of employment related support from the Department for Work and

Pensions and Jobcentre Plus. The Council's job brokerage, Croydon Works, already works in partnership with JCP to prepare and place residents into available jobs, and actively engages employers to use it to fill their vacancies. With various partners, the Council delivers a range of routes into work for young people to maximise the number of local people securing jobs by improving their skills and qualifications to meet the needs of local employers and supporting the transition from school to work.

Croydon is currently working with other London boroughs on the devolution of health and employment support from DWP and is urging Government to devolve further responsibility for employment support to local authorities. The Council is of the view that locally designed and delivered programmes best support local people whilst delivering best value to the public purse. Further devolution will also enable employment support and adult skills to be joined up across London to ensure that Londoners are best able to benefit from economic growth across the capital.

Night time economy

The Council welcomes the Mayor's commitment to the night time economy and was delighted to host Amy Lame, the new 'night czar', at her first public speaking engagement in this role. At its recent Economic Summit, the Council focused on the potential to build on the existing strengths of the borough's night time economy and to diversify the offer to ensure a vibrant local offer. Redevelopment and regeneration of the metropolitan centre will bring about significant changes and the Council's aim is to revitalise the borough's evening and night time economy to better meet the aspirations of current and future residents, visitors and businesses. Key developments include the recent opening of Boxpark, the refurbishment of Fairfield Halls and creation of a new cultural quarter, and the new Westfield shopping and leisure complex scheduled to open in 2020.

Over the years the council has worked in partnership with businesses and the police to create a safer environment for patrons and everyone involved in the evening and night time economy. We do however recognise that there is more work to be done to achieve our collective aim to make Croydon more attractive for residents and visitors and to become a key contributor to the night time economy of London. The Council welcomes the opportunity to continue engagement with the Mayor and the night czar, to participate in development of London's vision for a 24 hour city and to ensure that the recommendations of the London Night Time Commission inform the borough's own scrutiny review in this area.

Local business

Croydon's SME base is healthy and growing. In June 2016 an internationally renowned operator opened 'tomorrow' a new tech business incubator and start-up space in Croydon, which has London's fastest growing tech cluster. In support of its local employment base and to protect commercial space from conversion into poor quality flats under permitted development rights, the Council has adopted Article 4 powers and asks the Mayor to show commitment to this aim by endorsing this approach where it is appropriate for local authorities.

Town centres need to be protected but the current 'blob' approach is artificial and does not reflect the network of High streets, shopping frontages and mixed use that gives London its urban feel. An approach that reflects the network of streets that

contain a mix of non residential uses should be considered. Many of these uses are under threat with the quest for residential development bringing forward changes of uses and shop front conversions that result in a loss of affordable work and start up space.

Croydon's Enterprise Loan Fund has supported over 230 local businesses and has recently increased its lending portfolio to £4m. The Council welcomes the Mayor's commitment to support SMEs through innovative financial models and asks the Mayor to consider options for business growth funding and accelerator investment to support progression. The Council also asks the Mayor to confirm his commitment to Business Improvement Districts as a powerful mechanism to allow the business community and local authorities to work together to improve the local trading environment.

Part 4: Environment, Transport and Public Space

The Council supports the Mayor's approach to environment policy and aspirations to adapt to a low-carbon economy. The Council considers that adopting a multi-functional approach to environment policy, supporting transport, wellbeing and economic growth policy and stimulating growth and market opportunities for the environmental sector is a prudent way to balance a range of priorities.

Air quality

The Council is currently exploring options for freight consolidation and locally produced energy as part of its Growth Zone and welcomes the opportunity to further engage with the Mayor as the detailed viability plans are developed. This will enhance the work already underway in South London working through the sub-region's Freight Quality Partnership to reduce the impact of freight journeys in the sub-region.

The Mayor's proposals that Government commit to air quality standards and undertake other reforms associated with Vehicle Excise Duty are supported by the Council. The Council is already delivering a range of initiatives to improve air quality and welcomes the support of the Mayor to expand car clubs across Croydon to reduce the need for car ownership and increase the provision of publicly accessible electronic vehicle charging points.

It is noted that the vision sets out both the potential to expand the Tramlink network from Wimbledon to Sutton, and extend the Bakerloo Line to Lewisham and beyond. The Council considers that Tramlink is one of Croydon and South London's access/connectivity strengths and there is a need to maximise its potential and seriously investigate further extensions. The Council has been working with TfL through a corridor study to understand in more detail the feasibility and business case for extension to Crystal Palace and Purely and Coulsdon. The outcome of this work is due in the next couple of months and the Council would be happy to discuss this and how it might inform the London Plan review.

Such investment will support growth in well-connected locations and enable high density development to be achieved. It will also support the economic growth of the major centres on the network in South London, of which Croydon is the capital, and planning to further reinforce its position. An improved and expanded network will contribute to the objective of distributed economic prosperity across London. The Council therefore asks the Mayor to consider how tram expansion can act to both enhance a holistic transport offer across the capital, particularly for orbital routes in Outer London, and support environmental objectives.

With the projected growth in south London there needs to be a more flexible approach to bus service planning and provision as much of this development will only come in a piecemeal way. However, suburban intensification can only successfully be delivered with the requisite bus improvements and opposition to this type of development will only increase if GLA, TFL and LPAs cannot demonstrate joined up and responsive working.

Resource efficiency

The Council continues to promote walking and cycling through both policy and public realm investment and delivery. Therefore, the Council supports the 'Healthy Streets' concept, which aims to reduce traffic, pollution and noise, create more attractive, accessible and people-friendly streets where everybody can enjoy spending time and being physically active, and ultimately to improve people's health. The Healthy Streets, Quality Public Space and Higher Densities all accord with Croydon's recently adopted Transport Vision: Moving Towards a More Liveable Place.² Croydon would like to see strong support for segregated cycle ways as these have demonstrated that they can deliver a step change in cycle usage.

Linked to this the reference in the Vision to cycle Quietways and routes for all cycling abilities is also considered important by the Council. The Council is keen to release the cycling potential at the Croydon Metropolitan Centre (Metropolitan Centre with the greatest potential in London) and want to work with the GLA and TfL to deliver a network of Cycle/Walking routes converging on the Town Centre/Opportunity Area/Growth Zone.

The Council also supports initiatives to make our roads healthier and safer. Having already introduced 20mph speed limits within the borough, the Council welcomes the support of the Mayor as it engages with residents to expand this policy further. The Council also endorses the phasing out of purchasing diesel buses and the aim only to procure green buses (hybrid or zero emission) by 2018. However, it should not be ignored that trams deliver equally as valuable emission reductions and are as economically competitive.

Good design

The intentions regarding good architecture and design, tall buildings and how higher density development can be accommodated are sound principles, but it is essential that more detail is included in the London Plan review to drive up quality, manage integration with the location, support quality public realm, enable micro-climate management and not constrain appropriate high density development. However, the Council considers that it is important that a policy context can be set at the local level to understand location, place and character.

² <https://www.croydon.gov.uk/transportandstreets/policies/a-transport-vision-for-croydon>

Part 5: A City for All Londoners

Croydon has significant relevant and recent experience in adopting approaches which enable understanding of the issues and challenges facing residents to truly inform policy. The Council formed the Opportunity and Fairness Commission (OFC) in 2015, to gain a real and independent view of how inequality within the borough can be addressed and how partners across Croydon can create access to opportunity for all³.

The OFC recognises the unfulfilled potential in Croydon and that it can and must do better. It concludes that it can only do this if residents, local business, and the voluntary and public sector develop a common understanding of the challenges, develop a shared vision for the future, and agree a route map to unlock the potential of all its residents, particularly the most disadvantaged. The OFC's final report outlines recommendations across six key themes to help tackle issues such as families struggling to make ends meet, social isolation, anti-social behaviour and poor housing. The OFC is set to reconvene early next year to review progress and the Council recommends its approach and findings as a best practice example.

The Council supports the view that inequality is best addressed through a holistic understanding of the underlying factors and development of a holistic approach through housing, environment, transport, planning and economic policy. The Council's own equality objectives recognise the underlying socio-economic factors that drive inequality and the Council welcomes the Mayor's commitment to a new equality framework for the GLA.

Active citizens

Croydon's Voluntary and Community Sector has a strong history of innovation and enterprise, providing imaginative, community based solutions. This approach continues to be important particularly at a time of financial uncertainty and increasing need. The Council, like other public sector organisations, wants to work with the voluntary and community sector to build a new partnership based on innovative and transformative change to ensure collectively we deliver better outcomes for local people.

The Council previously has a number of funding programmes supporting a wide range of activities and services in the voluntary and community sector. These programmes were brought together to focus on key outcomes for the borough influenced by the findings and detailed research of the independent Opportunity and Fairness Commission, focusing on the following key outcomes:

- Vibrant, responsible and connected communities
- A connected borough where no one is isolated
- Supporting residents towards better times
- Leaving no child behind
- Finding homes for all

³ <http://www.opportunitycroydon.org/>

As outlined in the introduction of this report, the Council considers that active citizenship is key to strong communities. The Council supports proposals to adopt inclusive neighbourhood principles to improve community participation and social integration. These policy positions are aligned to existing local plans for devolution to communities and the Council welcomes the opportunity to share its learning and good practice to support the Mayor to deliver his ambitions.

Through the Community Fund the Council will support the Mayor's ambition for volunteering and working with citizens to engage in the democratic governance of the city, in particular young people. Through its Good Employer Charter, the Council will work with the local business community to complement the Mayor's offer through initiatives to support investment in and engagement with the local community

The Council also supports crowdfunding to harness the creativity of citizens, having experienced significant local benefit through a diverse range of schemes delivered across the borough. These have had a positive impact and the Council is keen to work with the Mayor to enhance the opportunities local citizens to drive forward local projects through crowdfunding approaches.

Health inequality

In terms of health inequality, the Council welcomes the Mayor's objective to promote a healthy London through leadership of the London Health Board to improve healthcare and partnership work with the NHS and local authorities. The Council is of the view that local areas already have considerable experience of this, with well-established Health and Wellbeing Boards and other collaborative approaches.

Croydon is one of the two Food Flagship Boroughs, part-funded by the GLA, promoting healthy eating in schools, and people receive information and advice through Children's Centres, Healthy Schools and colleges to promote healthy lifestyles. Croydon is the most improved food borough in the 2015 – Good Food for London report demonstrating the impact of local solutions to health inequality.

This is also evidence by the Council's innovative Live Well programme, a new holistic lifestyle service which includes a digital behaviour change platform, 'Just Be...', and a face to face healthy lifestyles service based on the current best practice around behaviour change.

The Council has also been working with Croydon CCG to develop an Integrated Health and Social Care system for the over 65s population in Croydon. Croydon's vision is for all partners (statutory, voluntary & community) to come together to provide high quality, safe, seamless and personalised care to the older people of Croydon that supports them to stay well and independent. Croydon's local residents have specified the outcomes they want to see delivered and commissioners have ensured these are embedded in the outcomes framework that will measure the success of these arrangements over the long term. Engagement of local people who use services is continuing to support the programme and design of Croydon's new models of care.

As this approach further develops, the Council welcomes the opportunity to collaborate with the Mayor through the London Health Board to explore options for devolution of health provision which will provide Londoners with responsive and integrated local services.

Policing, security and justice

Despite significant falls in levels of recorded crime and anti-social behaviour (MOPAC 7 indicators) over the past 10 years, crime remains high on the list of concerns for local people, many of whom perceive the crime level in Croydon. The Council endorses the Mayor's priority themes to:

- restore neighbourhood policing
- prioritise the safety of young people
- promote social integration to strengthen communities and work against hate crime, extremism and terrorism
- confront violence against women and girls
- publish a single set of shared outcomes for all justice agencies and make the case for more powers to be devolved to City Hall

The Council supports measures to improve public confidence and community engagement, and is already working with local neighbourhood police services to undertake targeted action to reduce crime and fear of crime at crime hotspots. The Council also encourages and supports local self-organised groups, such as Neighbourhood Watch and Pathfinders, and will support the Mayor to ensure that neighbourhood policing continues to assist these vital local community resources

At a local level, the Council has also implemented measures to reduce anti-social behaviour and environmental crime by combating drug and alcohol related anti-social behaviour and crime, rowdy and inconsiderate behaviour and environmental crimes such as noise nuisance and fly-tipping. Renewal of the borough's street lighting infrastructure and environmental improvements also works to reduce the fear of crime and the Council welcomes the support of the Mayor to continue targeted local initiatives in partnership with the police.

The Council has prioritised serious youth violence, robbery, knife crime and gang violence, working with partners through early intervention and prevention measures to reduce incidents. The Safer London Foundation will deliver workshops and engage with young people working alongside multi-agency partners and will work with police in CSE and gang related operations to ensure victims receive help. These issues remain extremely important to local people and the Council is keen to work with the Mayor to ensure that local neighbourhood policing continues to prioritise the safety of young people.

The Council welcomes the Mayor's commitment to social integration to strengthen communities and as a foundation to work against hate crime and extremism. There is extensive experience within Croydon of working with local communities to change attitudes and behaviours and help prevent extremism by helping to build more integrated and cohesive communities through social, cultural and inter-faith activities.

Croydon's Local Strategic Partnership has prioritised domestic violence and child exploitation as key issues over recent years. Croydon has joined the White Ribbon campaign to engage the community (especially men and boys) in condemning violence against women and girls. The Council has been working with police to bring domestic abuse offenders to justice, support victims and promote a change in attitudes to this crime. Working through the LSP, partners across the borough have been working to raise awareness of child sexual exploitation (CSE) in the community and develop a joint approach to identify and stop it. Specifically, the Council is working with Police, schools and other councils to respond effectively to missing children, particularly looked after children and children placed by other local authorities.

Whilst the Council welcomes the Mayor's commitment to confronting violence against women and girls, it calls on the Mayor to extend its priority to include domestic violence and child sexual exploitation affecting men and boys. Whilst these crimes are overwhelmingly perpetrated against females, the societal stigma associated with males who are victims of sexual crimes and domestic violence must be changed. The Council welcomes the opportunity to work with the Mayor, the Metropolitan Police Service and other partners to ensure that victims are appropriately supported through

The Mayor proposes longer-term ambitions to secure devolution of powers covering youth justice, probation, prosecution, magistrates' courts and short-sentenced prisoners. The Council is broadly supportive of an increased role for local stakeholders in these matters and is keen to work with the Mayor to develop proposals, including a strong role for local authorities and local partnerships.

Culture

As set out earlier, the Council's vision for Croydon is that it has a thriving culture and arts scene which attracts, engages and inspires residents, visitors and businesses by providing something of quality and interest for everyone. The Council is currently ensuring culture is a key component driving regeneration within the borough and is leading the development of an annual cultural and events programme for Croydon, attracting inward investment and improving Croydon's public realm and connectivity. The opening of Boxpark has provided a new performance space which will be complemented by the refurbished Fairfield Halls and redeveloped Whitgift Centre, which includes an IMAX and cinema complex. The Council also plans to develop regular performance spaces in Croydon's parks and public spaces to ensure a diverse cultural offer.

The Council considers that its plans align with the Mayor's ambitions to increase participation in and access to culture for all of London's communities. The Council is broadly supportive of the Love London campaign to open the cultural offer to more Londoners through affordable options for local people and is keen to explore with the Mayor how this may be delivered locally to enhance the existing Love Croydon campaign. The Council also welcomes the introduction of the London Borough of Culture, building on the European City of Culture model, which will focus attention and investment on one particular authority each year