

ECCO Response to 2015 Croydon Local Plan

Contents

ECCO Response to 2015 Croydon Local Plan.....	1
Introduction.....	2
Specific Amendment Comments	3
Garden Development.....	3
DM33.2 New Local Heritage Area (Inglis & Bingham Roads).....	3
Neighbourhood Centres.....	3
Ref: A339? Proposed Primary School – Stephenson House, Cherry Orchard Rd.....	3
DM33. Ref 116: Proposed Secondary School (Rees House, Moreland Road)	4
Traveller Sites.....	4
Shirley Road area developments	5
Consultation	6
Croydon Council approach to Consultation	6
ECCO Requests for Engagement with Planning Dept	7
Sustainable Communities.....	8
He who Pays the Piper calls the Tune.....	9
The Environment.....	10
Tall Buildings.....	11
Economic Regeneration	11
Background.....	12
Business Representation	13
Building Relationships & Inter-Trading.....	14
Traffic Management.....	15
Current Conditions.....	15
Addiscombe Rd, Cherry Orchard Rd and Addiscombe Grove junction.....	15
East Croydon Station Extension	15
Provision for the Potential Expansion of Gatwick Airport.....	16
Provisions for Cyclists.....	16
Provisions for Pedestrians	16

Introduction

In this response to the 2015 version of the Croydon Local Plan, ECCO have addressed the general themes raised by its own membership and by the communities' representatives of the Addiscombe Forum. It is informed by the conclusion of the ECCO representatives that the management of Croydon's regeneration strategy is deeply flawed, and that the roots of this are firmly located in the professional officer cadre and not with elected members.

ECCO provides both specific and general comments on the regeneration strategy, the CLP and its proposed amendments.

ECCO has grave misgivings about the lack of meaningful consultation and the failure of the Planning Dept to provide a timely response to the request to attend a meeting with ECCO to specifically discuss the Croydon Local Plan and associated Council policies and strategies.

ECCO represents the area between the North Side of Addiscombe Rd, the railway lines to the West, the South Side of Lower Addiscombe Rd and the rear of the Eastern properties on Tunstall Rd. The area is composed of the following streets; Cherry Orchard Rd, Addiscombe Rd (north side to the Cricketers), Colson Rd, Blake Rd, Brickwood Rd, Bisenden Rd, Chisholm Rd, Cedar Rd, Lebanon Rd, Addiscombe Court Rd, Tunstall Rd, Oval Rd, Leslie Park Rd, Cross Rd, Leslie Grove, John's Terrace, Jackson's Place, Leslie Grove Place, Edwin Place, Alpha Rd, Bridge Row.

Specific Amendment Comments

Garden Development

ECCO supports limitations on garden developments in order to preserve the green environment and provide sources of food for wildlife, essential for pollination and a balanced environment.

However ECCO notes that were a policy to be adopted to oppose garden developments, it would further reduce the space available for housing and add even further to the densely developed and inhabited centre.

DM33.2 New Local Heritage Area (Inglis & Bingham Roads)

ECCO broadly supports the preservation of historically important environments that can be shown to be either profoundly distinct or essential to the understanding of the town's history.

However, ECCO notes that while various communities and the Planning Dept shown enthusiasm to designate such areas as being of historical or architectural interest, it has not been matched by raising awareness across the town, and beyond, of these areas and to encourage students and members of the public to explore these areas to obtain an informed understanding of Croydon's history and architecture.

ECCO reiterates the concern that by protecting areas from development, the burden of providing homes, commercial premises and community facilities inevitably falls on other areas, which are already burdened by the exploitation of their limited space. This inevitably means that Croydon will have to have medium to very high rise developments in those areas, exploiting vertical space, to meet its current housing targets and will be challenged to provide essential public services such as schools.

Neighbourhood Centres

ECCO welcomes the concept of Neighbourhood Centres for areas such as the Cherry Orchard / Lower Addiscombe Roads area if this concept helps revitalise the ECCO retail areas and resolves the transport and traffic issues that blight the area. However, ECCO reserves judgement and offers neither support nor opposition to this concept until further details are available for the following reasons;

- The proposal as presented to date lacks any apparent substance and appears to be a belated inclusion to counter complaints that areas such as Cherry Orchard Rd and Lower Addiscombe Rd have been denied not only funding following the riots (that it should have been entitled to) but also the funding that has been awarded to the retail parades at the centre of the Croydon Places.
- No meaningful consultation has occurred between the Planning Dept and local stakeholders about the Neighbourhood Centre concept.
- At a time when Croydon Council remains in deep financial difficulties, and it is not clear how Neighbourhood Centres might be funded and supported.

Ref: A339? Proposed Primary School – Stephenson House, Cherry Orchard Rd

ECCO is opposed to this proposal for the following reasons;

- Neither Cherry Orchard Rd nor the adjacent roads are suitable for parents to bring children to either on foot or by car. Cherry Orchard Rd is a key arterial road connecting the northeast of the borough to the centre. It is a very busy area in terms of all forms of road traffic, and to introduce significant numbers of children into the area would be to place them at risk.
- It is essential to retain office space in and around East Croydon station, especially lower cost property such as Stephenson House, in order to sustain and foster the Croydon economy and provide local employment opportunities.
- The proposed school is intended to cater for children from the north of the borough. It would be better to find opportunities for schools close to where these children live primarily to foster relationships between the future school and the community it serves. It is highly undesirable to “bus” children in from distant areas.
- The site has insufficient available space for outdoor activities.

DM33. Ref I16: Proposed Secondary School (Rees House, Moreland Road)

ECCO's objections to the site being developed as a secondary school are as follows;

- ECCO's position on this proposal is that the arguments for this site to be turned over to a secondary school have not been made by the Council.
- ECCO has previously understood that the site was to become much needed social housing as part of CCURV, which is in keeping with the adjacent areas.
- The site is too small to provide the facilities required by a secondary school, such as playing fields. It is not obvious to ECCO where the school would access playing fields and open space.
- It would be located by a very busy junction with significant numbers of fast food outlets etc, which does not provide a good environment for young people.
- Affordable housing is desperately needed in Croydon, and as Rees House is a medium rise building constructing flats there would not cause a material change to the environment.
- Although the CLP asserts that secondary school places are more urgently needed than homes, it provides no further detail where this demand exists. If the demand is largely within the north of the borough then every step should be taken to create facilities close to where the future pupils live. It is not apparent within the ECCO area that there is significant demand that cannot be met by existing provision.
- There are already 3 secondary state secondary schools and 1 private secondary in the area. It is not desirable to concentrate more secondary provision into such a small area.
- The Council should explore other sites in Croydon, preferably away from the town centre but well served by public transport that could provide a far better environment for learning. (Conduit Lane site which is close to playing fields, Lloyd Park and provides a leafy pleasant environment might be one such location.)
- The Council has consistently failed to effectively engage with local communities to seek solutions and obtain community support.

Traveller Sites

ECCO supports in principle the creation of sites for travellers as means to address reported anti-social activity and to promote engagement between the traveller and settled communities. The caveat that ECCO applies to this support is that it expects the Council to provide active

management to ensure that the sites are well maintained and do not become venues of anti-social behaviour.

ECCO notes the lack of factual communication regarding this issue by the Council, particularly with the affected communities.

Shirley Road area developments

ECCO neither opposes nor supports this proposal, but seeks to make the following observations;

- Many communities seek to preserve their current environment and prevent developments, and ECCO has sympathy for this position. However a compelling argument has yet to be made for preserving this area.
- ECCO alerts others to the urgent need to provide housing in Croydon, currently estimated at 43,000 new homes by the middle of the next decade.
- ECCO notes that should this area be protected from any development, then other areas will inevitable experience even more intense development and this does not augur well for a cohesive community where burdens and benefits are equitably shared.
- ECCO alerts others to the unacceptable numbers of families living in overcrowded and unsuitable conditions in Croydon, and ECCO considers it iniquitous that a modern and wealthy town like Croydon cannot provide adequate housing for its inhabitants. ECCO also seeks to raise people's attention to the negative consequences for young people in crowded conditions whose education may be blighted by the lack of basic amenities as a quiet space to do homework, and consequential loss to the community of their potential.

Consultation

ECCO Position: The Council should inform the GLA and CLG that it is unable to meet the deadline; respond the community representatives for direct meetings to explore the implications of the Croydon Local Plan in relation to other Council Strategies; and when this is achieved to assist the communities to formulate an informed response.

Croydon Council Planning Department's approach to consultation, regardless of the political complexion of the Council, has been deliberately aimed at undermining meaningful engagement with the community. It has been a notable characteristic of Croydon Council's mid to senior management that it does not respond to and engage with the communities, unlike other comparable London local authorities.

The officer defined approach, while reducing demands on officer time, precludes meaningful engagement with community representatives who may have informed specialist contributions to make. Given the weight afforded to developers and other corporations, it would appear that council officers at least have a preference to exclusive dialogue with Corporate Stakeholders.

Current arguments made by officers that they currently have insufficient staffing resource to attend resident association and other community forums may be valid since the successive rounds of redundancies, but it does not explain why officers declined to attend prior to the commencement of redundancies in 2009. Neither does it explain how they have time to engage with Corporate Stakeholders.

Croydon Council approach to Consultation

Croydon Council's approach to consultation with the community over the past 15 years regarding the redevelopment of Croydon Centre and its impact on the existing communities has been as follows;

Blank Sheet:

The use of consultations sessions located in local community venues (i.e. churches) held in the afternoon and early evening, typically from 13:00 hrs to 19:00hrs, in which residents are asked their opinions upon themes. The council commissioned consultants to undertake these sessions, and the brief was that the consultants should not provide any directive regarding the potential and practicalities of any comments made by attendees. Typically the attendees were persons who were not economically active, or whose employment patterns permitted them to attend.

As a consequence these responses tended to reflect the perspectives of a rather conservative older generation and people with little understanding of the critical issues. (The overall tone was that the attendees wanted a return to the 1970's when 36% of the average working man's wage could provide housing for a family, but were highly resistant to countenancing the concept that socio-economic decisions since 1979 had precluded this and their response was that such suggestions were "political" and had not place in the consultation session.)

The use of consultants who had no insight into the opportunities and limitations for Croydon in terms of the future detracted considerably from the potential engage meaningfully with Croydon's residents in the areas affected by development. The consultants' role was a facilitator, and not informed professional advisors / guides able to assist attendees to express informed views based on facts.

The "Blank Sheet" approach elicited responses around the themes that bore no relation to what was achievable within Croydon's and national PESTEL (Political / Economic / Social / Technological /

East Croydon Community Organisation

<http://eastcroydon.org.uk/>

Environmental / Legal) opportunities and constraints. The value in terms of obtaining an informed consensus view of the direction of Croydon's development was negligible, and the approach is highly likely to have raised expectations that reactionary elements in the local community could block development and that the future of Croydon would be shaped by their reactionary ambitions. The "Blank Sheet" approach simply fostered disenchantment with the processes and strengthen cynicism in the community.

The Metropolitan Centre and the Croydon Places

The Council's creation of the Croydon Places created boundaries for consultation that disempowered the communities immediately adjacent to the town centre. The "Places" were based on historic centres that while having meaning to the older established communities did not inherently reflect the popular associations with place among the newer inhabitants and those communities adjacent to the town centre.

The Places forums composed overwhelming of residents associations from the suburban areas ensured that the articulated community view reflected that majority, and in large part this was about preserving the status quo. In the Addiscombe Place forum, with the exception of ECCO, none of the residents association areas were directly affected by the Menta~Redrow proposals through co-location.

This approach ensured that the communities around the periphery of the town centre were profoundly marginalised as they were excluded from meaningful and collective engagement as key stakeholders in the town centre regeneration and were forcibly associated with suburban communities that had an economic interest in town centre regeneration but are only marginally impacted by the negative consequences of the regeneration projects.

The 2011 Riots in Croydon and their impact highlighted that the communities around the town centre had significant communality and should be understood collectively. While the restoration of Reeves Corner received considerable attention, the Council failed to provide community leadership and largely left it to the town centre periphery communities to try to address the issues. Areas such as East & West Croydon, 4 years later, can justifiably feel a certain degree of abandonment by the Council.

The Places approach and its weighting towards the suburban areas, and the Planning Dept's refusal to engage with communities other than via the Place Forums, marginalises the peripheral communities and significantly diminishes their opportunity to express their opinions on the Croydon Local Plan relating to the experiences of communities with the high density developments being imposed on upon. This is a peculiar stance for the Planning Dept to take as the peripheral communities have to date been largely more supportive of the regeneration of the town centre, and have not articulated "Nimbyism" unlike some other communities. ECCO has quite independent of the Council and the Planning Dept initiated links with developers (private & social housing) to present a welcoming stance towards the future residents, and lay the foundations for an inclusive, coherent and sustainable community.

ECCO Requests for Engagement with Planning Dept

In spring 2016 ECCO requested that the Planning Dept attend a meeting with the membership to explore the issues in the Croydon Local Plan as a pre-cursor to ECCO providing an informed response. ECCO's position was that as there hadn't been any community representation since the collapse of RECC and its formation in 2013, it behoved the council to provide the opportunity to this distinct community to explore the issues, develop an understanding of the council plans and then articulate a reasoned and informed position. Some individuals had sought to remain involved in the

intervening period but ECCO was concerned that the opinions expressed, however well-meaning, could not be said to be representative of the area.

Initially the Planning Dept agreed to attend an ECCO meeting, where the topic for discussion would be the Croydon Local Plan and more broadly issues around the regeneration of Croydon as they affect the ECCO area. ECCO requested that the Planning Dept provide a date and there was the intimation that this would be in June or July 2015. Unfortunately the Planning Dept were not forthcoming and it drifted into autumn, and again ECCO sought a date for a meeting. Ultimately in October 2016 the Planning Dept informed ECCO that it would not attend a meeting with ECCO as this would mean they would potentially have to attend meetings with every other community group. The Planning Dept informed ECCO that it would only engage with communities via the Place Forums. ECCO were somewhat disappointed with on the following points;

- Firstly a great deal of time had been wasted waiting for Planning to decide they could attend a meeting and had ECCO been aware of this early on it would have made different decisions about preparing a response. Cynically, some ECCO members thought that this was part of a strategy on the part of the Planning Dept to effectively exclude ECCO from meaningful engagement as the Planning Dept expected considerable opposition to their plans.
- Secondly, no other community in the Addiscombe Place area is so acutely affected by the town centre developments; unprotected within the earlier Croydon Local Plan; and so poorly represented.
- Thirdly the Addiscombe Forum is mainly composed of communities for whom the Croydon Local Plan in its original and now revised versions provides considerable protections from high density development.

The Planning Dept's approach over the years has diminished the quality of community engagement, and fundamentally devalued the product obtained. This stance contributes considerable to the strength of argument against the Council's regeneration strategy, and due to the opposition delays the implementation of plans.

Sustainable Communities

The ECCO Position: The Croydon Local Plan, reinforced by the inadequate consultation strategy, is fundamentally flawed in its approach and fails to lay the foundations for sustainable and cohesive communities. It is the considered opinion of ECCO that the Council strategy has been shaped primarily by the political interests of the previous Conservative administration as it protects the interests of its core voters at the expense of the communities on the periphery of the Metropolitan Centre by disempowering these communities making them subservient to the area "Places" dominated by communities with which they have little in common. The revisions since the election of the current Labour administration are insufficient to re-balance the approach to effectively foster sustainable communities. The CLP does not reflect the experiences of the 2011 Croydon Riots and does not provide for community engagement and cohesion across the affected areas. Further no consideration has been provided for in the MLP approach for engagement with sub-communities who are marginalised or excluded due to socio-economic and cultural factors, or are highly transitory due to the characteristics of the current domestic property rental market.

Croydon is a town with distinct political, social, cultural and economic divisions. The centre and north of the borough are markedly diverse, more left wing and contain areas of significant poverty. The south on the other hand is overwhelmingly middle class white, older, wealthier and politically

conservative. The challenge for the Council in preparing a potentially successful regeneration strategy is to draw these two disparate factions together if a cohesive community is to be developed. However, such cohesive leadership has been lacking in the past and the 2015 CLP reflects this in many respects.

Croydon needs revitalisation and regeneration if it is to flourish again, and not to simply sink into being little more than a dormitory town serving central London. To achieve this the talent of all communities needs to be brought on board and all communities must share in the effort and the benefits. Thus politicians and community representatives must broaden their outlook and consider the interests of all stakeholders in the community and not just their own self-interest.

The CLP and Master Plan approach is to concentrate very large numbers of dwellings into the town centre and the immediate periphery, together with community facilities and services. This approach preserves the outer areas and protects them from the negative impacts of development. But it also creates and reinforces a new and profound division in the borough.

The division will be between the high density centre and the peripheral areas, like ECCO East Croydon, with its mix of affluent and poor communities, will be the economic powerhouse of the town that generates an inordinate proportion of the town's wealth. The centre will also contain the majority of the borough's employment opportunities and its primary transport hubs. For all intents and purposes the centre will be its own self-sustaining community sharing little in common with either the northern or southern residential areas, but especially the southern areas that have significantly greater access to green space and enjoy a much cleaner and quieter environment. Further by concentrating public services (hospitals, bail and other hostels, drug treatment centres, probation services, courts, social services, refugee centres, high density social housing etc) into the centre, the centre will inevitably become host to an array of social issues.

Once this is achieved Croydon town centre becomes a quasi-city within a borough, where the contrasts between the inner and outer areas are stark. While the current political environment is polarised between Labour and Conservative, with the leadership of each closely associated with their centres of support. Once the high density centre is developed, it introduces a dynamic in which neither of the existing powerbases has automatic claim upon. This is likely to create opportunities for other political parties to exploit, and they will be inherently incentivised to highlight the inequities that will be the result of the CLP.

He who Pays the Piper calls the Tune

The ECCO Position: It is the considered view of ECCO that to obtain ECCO's support for the Croydon Local Plan the Council must commit to ensuring that public service delivery in both terms of quantity and quality should directly reflect the level of Council income generated via all forms of taxation levied on residents and businesses in the ECCO area, and be proportionate with the use of public realm and local authority service provision utilised by local resident & businesses, and persons and organisations outside of the area. ECCO considers that the current approach of equal service to all is no longer sustainable in light of the direction of the CLP that advantages those areas that do not bear the burden of the proposed developments.

While it is not within the scope of the Croydon Local Plan, the issue of Council income and expenditure is relevant to it insofar as the proposals contained in the Council's planning documents envisage a town where a significant proportion of the town's population reside within the Metropolitan Centre and the peripheral communities. These areas also contain the overwhelming

East Croydon Community Organisation

<http://eastcroydon.org.uk/>

majority of businesses in the town. Combined they represent a massive source of income for the Council.

However, the ratio of public realm to resident in these central areas is very low compared with the outer areas, and unlike the outer areas the residents in the central areas do not enjoy predominantly exclusive use of the public realm.

Local authority provision of basic services (i.e refuse collection) is organised on a flat service for every resident regardless of where they live.

In the planned future Croydon is it likely that the centre will generate anything up to 50 times the income per hectare of public realm than the outer areas. Key service hubs (i.e. Factory Lane Transfer Station) are adjacent to the town centre and for all intents and purposes are part of the peripheral communities. Thus delivery of services is much more efficiently delivered within the centre than in the outer areas. As a consequence, due to the lower costs of delivery, the town centre will be directly subsidising the outer areas.

If we are to draw a direct comparison between the Cherry Orchard Rd retail area and the Addiscombe Retail Centre, we can see in the plans there will be a population density in and around Cherry Orchard Rd retail area that far exceeds that of Addiscombe. Yet to date the Cherry Orchard Rd area has been denied improvement funds, despite having been within the areas affected by the riots. To date when this has been challenged, the response has been some largely nebulous assurances that once the high density developments in the ECCO area have been constructed that some action may be taken.

The failure of the Council provide guarantees that the level of expenditure across the town will reflect the levels of tax income for each area and the utilisation of the public realm lays the foundation for considerable division within the town. Yet it is not simply limited to the impact of the inequalities in Council Tax against service delivery costs. The impact of the regeneration developments and the loss of environment and amenity are limited almost exclusively to the existing communities within the centre. Yet the entire town will derive proposed benefits and share them equally. Thus a cost benefit analysis of the regeneration proposals, including the Croydon Local Plan, would indicate that the benefits to the existing inner communities are at best marginal.

In a balanced and representative environment, those who generate the wealth should be entitled to some advantage in determining how that wealth is disbursed throughout the community, if only as an incentive to continue to generate wealth and remain part of the community.

The Environment

The ECCO Position: The Local Croydon Local Plan provides little or no provision for the maintenance or augmentation of the environment in the ECCO to ameliorate the impact of the developments and subsequent high density habitation. Without explicit provision to enhance the environment by safe-guarding existing green spaces, greening the public realm and adopting policies that promote the greening of private space (i.e, front gardens), linked to long-term Council commitment to fund this, ECCO cannot support the CLP. Without the inclusion of a coherent traffic management plan that will significantly reduce the exposure of residents, especially children, the elderly and other vulnerable persons, to toxins produced by traffic ECCO cannot support the CLP. There is no significant provision of green play space for children residing within the ECCO area in the CLP and none that is accessible without having to traverse a busy thoroughfare.

Public space in the future town centre and peripheral areas is compromised by high levels of traffic, and public access to green space for the inhabitants of the centre is extremely limited. This is particularly the case for children who cannot easily and safely traverse the main traffic routes to access even parks that appear quite close on a map. This denies children the opportunity to develop progressively independent lives, as would have been the case for earlier generations, and be encouraged to develop physically through outdoor activities.

The Council until recently has demonstrated indifference to the quality of life, safety and health impacts to ECCO residents caused by the high levels of traffic moving through the area.

Tall Buildings

The ECCO Position: ECCO supports the proposal that future planning permissions for “tall buildings” should only be given for developments in the core of the town centre, and that developments towards the edge of the Metropolitan area are lower, progressively scaling down to meet the existing building heights in the peripheral areas.

ECCO acknowledges that high rise development provides significantly greater residential space than conventional two storey housing and given the demand for housing and the constraints on space high density tall buildings are probably the only solution for Croydon. However the majority of ECCO’s membership finds the presence of tall buildings objectionable due to the loss of environment and the increased burden upon the community infrastructure.

Both Gavin Barwell MP and Cllr Fitzsimons noted the issue of tall buildings and the desire that they are concentrated in the centre of the metropolitan town area, and buildings along the boundary are scaled down to somewhere close to medium density. While this is a reasonable aspiration the shortage of developable space within the borough and the targets set for residential dwellings drive the need to construct tall buildings close to the boundary of the town centre and to impinge considerably upon the adjacent areas, like ECCO. There is a danger that permitting tall buildings up to the boundary of the Metropolitan area will create a wall-like unrelieved frontage similar in feel to massively walled medieval towns that casts the adjacent areas into shadow and presents a forbidding “visage” to the peripheral communities.

Economic Regeneration

The ECCO Position: There is insufficient evidence within the Croydon Local Plan for ECCO to have confidence that meaningful Economic Regeneration will be achieved. ECCO cannot support the CLP as it has not represented nor addressed the needs of a key group within the community that ECCO’s constitution sets out to represent.

The strategy for economic regeneration of the borough should be an overarching factor influencing the direction of the Croydon Local Plan, and the CLP must demonstrate coherence with it to be credible. The Council has failed to engage with communities and other stakeholders to present leadership and the arguments for the planning strategy. Past performance since the early 1990’s has not inspired confidence in council officers ability to direct and deliver economic regeneration that will lead to improved lives for the town’s population that will provide access to a quality of life that previous generations have enjoyed.

Background

Finance Sector

In the post-war era the financial services sector enlarged its presence in Croydon significantly exploiting the availability of cheap labour and property. While some striking developments did occur, a significant proportion were low-cost, energy inefficient system built high-rises that are no longer fit for purpose. Until the late 1980's the office work place had changed little since 1945. However coinciding with the early 1990's recession a dramatic change occurred in respect of Information Technology and Communication.

The milestone in ITC was the development of the Intel 486 processor which rendered many office / administration functions redundant (i.e Post Rooms became largely redundant with the development of the internet email) and placed demands upon existing office properties beyond their capacity for cabling and telecoms supply. This created in Croydon a distinct situation where both low skill workers were laid off and many office premises were incapable of being used effectively by their business occupants. To compound this towns outside the M25 encouraged new often cheaper "future proofed" office developments that were very attractive to Croydon businesses. As a consequence Croydon saw a massive outflow of employers in the office sector.

Manufacturing

Following the end of WWI Croydon became a relatively high-tech town with large and small engineering works, especially in electrical/ electronics. By the early 1990's the manufacturing sector was in decline, leaving a small number of "metal bashing" works. The Council appeared to have no strategy to address this, and those manufacturing businesses that did come to Croydon in the 1990's were generally ignored.

Retail

The retail sector has been the significant growth area, but there has been no consistent strategy to supporting this sector. In the post-war era the Whitgift Centre has been dominant and was distinct prior to the 1990's and the emergence of competing centres in Bromley, Kingston and Blue Water. Croydon's encouragement of the "out of town" retail operators to replace the declining manufacturing and distribution sectors created a dynamic that undermined the town centre retail operations.

As generational socio-economic factors meant that what disposable wealth existed in the town was concentrated in the hands of the established and aging population whose spending locally was in decline, Croydon retail operators found themselves with a market that had little in the way of disposable income compared with the heydays of the Sixties and Seventies. Further due to inadequate investment in transport and the town environment (i.e Car parks) resulted in poor customer experience for the "hinterland" market in towns to the South, who increasingly had better choices elsewhere.

Nevertheless, Croydon resolutely clung to the notion that retail will provide the solution for its town centre problems and create employment. Unfortunately the retail sector wage levels are extremely low, and do not provide a level of income that can sustain the aspiration have a home and family in the Croydon property market. Further the construction of high density residential properties adjacent to East Croydon Station for professionals displaced by property prices in Central London does not inherently mean that this will result in a significant increase in the level of spending in the town centre.

Despite successive statements (largely aspirational) Croydon has struggled to attract prestige retail outlets and remains associated with an established market of the pre-1990's when the town was smug, unimaginative, conservative and working class in its tastes.

East Croydon Community Organisation

<http://eastcroydon.org.uk/>

The town centre has struggled to redefine itself, and many of the retail outlets that had / have the potential to reshape the town's image have not been effectively supported. The long term dominance of the Whitgift Foundation and its myopic commercial interests have failed to provide leadership for the town as a whole and have in effect undermined their own retail offer. Such market responses that there have been to demand have resulted in further denigration of the town's reputation (i.e. images on TV of intoxicated Croydon women slumped in corners, fighting with the police or vomiting in the gutter).

In more recent times Croydon has concentrated its regeneration in the retail sector and various developers have presented themselves from time to time with various blandishments. So far the Centrale development has actually come into fruition. The redevelopment of St Georges Walk, Segas and Ellis Houses has stalled entirely, and the area detracts from Croydon's offer.

The weakness of Croydon's almost exclusively retail strategy is that it has to turn around the town's reputation for being boring and tacky characterised by a wealth of "99p" shops and Poundland, and has to steal back custom from already well established alternatives. In addition it needs to address the access routes into the town and improve basic visitor experience through improved signage, more accessible car parking and a generally more positive stance.

Business Representation

Business representation is dominated by the major interests, most notably the Whitgift Foundation, and this approach ignores that Micro & SME businesses are vital for the sustainable economy. It is of course challenging to engage with the Micro & SME sectors as they can ill-afford to expend their precious time in attending expensive and exclusive conferences. Culturally they can be additionally challenging for local authority professionals who have scant insight into the operation of commercial concern in a fast moving and pressured environment. The limit of most public sector officer's experience of Micro & SME businesses is as customers of their services, and this is reflected in the plethora of unnecessarily complex forms that Micro & SME owner / managers have to complete to satisfy the requirements of an array of public sector functions, none of which are effectively joined up or appreciate the cost to that business.

Croydon Chamber of Commerce represents primarily establishment interests and has no significant history of seeking to reach out beyond its own highly introspective position. In many respects it reflects the culture of the Croydon establishment that has provided the leadership, or lack of it, over the last four decades and presided over Croydon's decline.

Business representation does not reflect the highly diverse community and the high level of self-employment and entrepreneurialism to be found in Croydon's immigrant populations. As a consequence its proposals are not relevant to those business communities, and do not engage with them.

A measure of Croydon's business representation culture is the complete absence at East Croydon Station of any promotion of Croydon as a "place to do business", or any enterprise promotion services. It would be almost unimaginable in any other environment that a town with a major transport hub, through which thousands of decision makers and influences pass daily, would not seek to use the opportunity to promote the town. It is as though Croydon does want and doesn't need businesses to consider Croydon as a potential relocation venue.

In the ECCO area the failure to include into the Croydon Local Plan proposals to address the issues that local Micro & SME business encounter and that inhibit their capacity to increase turnover and thus increase employment opportunity in the area. The inclusion in the 2016 CLP of a

East Croydon Community Organisation

<http://eastcroydon.org.uk/>

Neighbourhood Centre located vaguely at the junction Cherry Orchard Rd and Lower Addiscombe Rd is so nebulous that it is incapable of instilling confidence in local entrepreneurs that the Council is serious about regeneration, and that potentially these entrepreneurs could take the risk of investing in the area. Micro & SME business are more concerned with pragmatic and tangible proposals as the environment they inhabit is acutely pragmatic and tangible, and the notional is at best little more than self-indulgence.

This late inclusion of this vague measure lacks credibility and appears more as little more than a sop to genuine grievances that businesses in the area have about the lack of support and investment, and the concentration of public funds into Addiscombe Retail Centre. The earlier statements made by officials that the investment in Addiscombe Retail Centre would ultimately be matched by I06 Funding is disingenuous as the I06 Funding impacts are in the distant future and access to Council funding should be linked to need and policy as I06 Funding may never be realised if the developments are not completed and / or the developer were to go into liquidation. The decision to generously fund Addiscombe Retail Centre at the expense of Cherry Orchard Rd / Lower Addiscombe Rd area was a deliberate decision by the administration at the time to advantage one area over another, and to allow Micro & SME commercial area in the ECCO territory to decline. This suggests that political interests outweighed the strategic regeneration interests as a declining Cherry Orchard Rd retail area devalues the residential offer of the Menta-Redrow development, and potentially suggests that officers have little or no appreciation of the market impact of declining and poorly maintained street scenes upon the inward investment pull. It also stringly indicates that the Council has little interest in meaningful engagement with businesses in the ECCO area, and even less in shaping the CLP around their needs to sustain the economy.

The importance of the business community to the ECCO area was critical in formulating the constitution of ECCO to include businesses in the area and not to limit membership to home owning residents, as some other associations have done.

Building Relationships & Inter-Trading

In 1997/8 the outer south London boroughs recognised that there had been a fundamentally change in the market and inter-trading since the early 1990's recession. Whereas previously businesses had focussed on serving the City of London and the West End, what had emerged was significant inter-trading across the outer south London areas and the need for a coherent approach to economic development and business promotion across the boroughs. This was also paralleled by workforce movement changes with the arrival of Tramlink and improvements to the rail network. Led by LB Lewisham there was a redefinition of the LCCI territory and the creation of the South London Chamber of Commerce.

Lewisham recognised that it lacked capacity to cater for its growing SME sector and looked to Croydon to provide premises to retain these employers within commuting reach and thus sustain levels of employment in Lewisham. It put forward a proposal to LCCI, SLCC and the other outer London boroughs that described Croydon as the Hub borough around which all the other borough economies operated, and proposed that the boroughs should collaborate to strengthen their economies and direct developing SME's to Croydon to take up its redundant office and factory space. Further LB Lewisham proposed that as the government was severely reducing enterprise support and advice services, that they should jointly reorganised their services to strengthen them where each borough would provide a specialist service (i.e. LB Sutton – “Green the Supply Chain”, LB Lewisham – International Trade). This was supported by LCCI, SLCC, DTI, and EU DGxxiii as rational and achievable approach.

East Croydon Community Organisation

<http://eastcroydon.org.uk/>

Unfortunately, LB Croydon and the Croydon Chamber of Commerce showed little interest for this combined approach and declined to collaborate. Without Croydon's active participation, the strategy disintegrated and so too did SLCC. What emerged was reversion to the CCC and remaining SLCC areas formed an East and West SLCC.

Once this occurred Croydon lost access to an organisation with equal weight to that of LCCI; the support of the DTI and EU DGxxiii, and more importantly the active collaboration of the adjacent London boroughs in terms of collaboration and business promotion. Croydon had never had the enterprise development strength of Lewisham and some of the other boroughs, and what it had had in 1990 had been allowed to decline severely during the recession. What did remain was largely Section 5&6 Home Office funded activity that sought to promote minority & ethnic groups into self-employment.

Micro & SME Development

There is nothing within the CLP that suggests that Croydon is fostering a positive environment for Micro & SME businesses and thereby explicitly recognising the critically of the Micro & SME sectors to the economic health of the borough.

In the ECCO area the lack of specifics to foster an improved environment and thus improve the trading position of the existing traders is a significant omission. The continued decline across the area reduces its attractiveness to entrepreneurs. That businesses continue to trade in the area is evidence of their commitment, and indicative of their potential were the CLP to make active and meaningful provisions to support them.

In particular any form of traffic management and parking provision has been omitted from the CLP even though this is the most commonly cited issue by all types of business in the area. In respect of these issues, businesses seek only parity with the Addiscombe Retail Centre.

Traffic Management

The ECCO Position: ECCO deplores the long-standing absence of a coherent traffic management strategy for the town and calls upon the Council to demand that TfL undertake the long awaited traffic survey with the object of rationalising traffic movements in the town; reducing the impact upon pedestrians; improving the pedestrian experience to encourage lower car usage; and to provide coherent cycle routes linking all parts of the borough that do not place cyclists in harms way.

The effective management of all forms of traffic is core to the regeneration of any community, and this is particularly evident in Croydon.

Current Conditions

Addiscombe Rd, Cherry Orchard Rd and Addiscombe Grove junction.

The junction between Addiscombe Rd, Cherry Orchard Rd and Addiscombe Grove, where trams, motor vehicles, cyclists and pedestrians meet at a key hub requires a complete overhaul to improve the flow of all road, track and pavement users. The incoherent traffic management at this junction encourages road users to seek rat-runs through the residential areas causing noise and dirt pollution, anti-social behaviour, and the loss of public realm for children and the elderly.

East Croydon Station Extension

As it is proposed to extend East Croydon Station adjacent to Lansdown Road provision should be made for train users in the north of the ECCO area to be able to access these new platforms without having to walk as far as East Croydon Station at the end of Cherry Orchard Rd.

East Croydon Community Organisation

<http://eastcroydon.org.uk/>

ECCO suggests that the Council require that Railtrack install a bridge to facilitate pedestrian access close to the parade of shops on that part of Lower Addiscombe Rd west of the junction with Cherry Orchard Rd, and into the heart of the Cherry Orchard Rd shopping area.

This bridge could be located somewhere along Cross Road. This would potentially ease access to the station for people living north of Lower Addiscombe Rd and increase footfall along the shopping parade. It would also enhance rail access for the residents in the Cross Rd and Leslie Grove area. Creating an access route away from the Cherry Orchard Rd thoroughfare would create a more pleasant pedestrian commuting route.

Provision for the Potential Expansion of Gatwick Airport

As the proposals for the Heathrow Airport Extension appear less certain outline provision needs to be made in preparation for the decision to expand Gatwick Airport. ECCO believes that an expansion of Gatwick Airport will inevitably cause an increase in traffic moving through the town towards the M23 at Hooley.

Provisions for Cyclists

ECCO urgently calls upon the Council to develop and implement a strategy to create a coherent travel plan for cyclists and ensure there are safe cycle routes connecting all areas in the borough.

At present cyclists are compelled to share space with fast moving traffic traversing the town that places them in danger and does not encourage people to have confidence to explore cycling as a mode of transport.

Provisions for Pedestrians

ECCO calls upon the council to place pedestrians at the forefront of transport planning to safeguard their well-being and health, and to create pleasant environments that encourage people to walk rather than travel by car.