



# Planning Peer Challenge

## Croydon Council

*21<sup>st</sup> to 23<sup>rd</sup> June 2022*

Feedback Report

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## 1. Executive summary

- 1.1 This report summarises the findings of a Peer Challenge review of the Planning Service at Croydon Council. The review was organised at the request of Croydon by the Local Government Association (LGA) with the Planning Advisory Service (PAS) and undertaken on site by its trained councillor and officer peers.
- 1.2 Croydon Council is going through a time of political change and is delivering its Planning service against a backdrop of significant financial constraint. At the same time the service is experiencing an increase in planning applications, difficulties in recruitment and a high level of public scrutiny. Despite these constraints the service is managing to deliver best practice in some areas, as well as a strong commitment to working with its communities and developers to improve the service.
- 1.3 However, the Council's ability to deliver a Planning service is close to breaking point. The service is at a very significant crossroads; if improvements do not take place urgently then the Council will not be able to manage an effective Planning service. This will have enormous implications for everyone who uses and benefits from the Planning service at Croydon. The Planning service needs an improvement plan that is focused on meeting the needs of Croydon residents, the development community, the political administration and the staff who are employed in the Planning service. It will not be a success unless all these players are included.
- 1.4 The peer team found a group of very professional and knowledgeable staff who are clearly capable of meeting the Planning challenges in Croydon. However, workforce reductions in recent years have resulted in workloads for individual staff that are unmanageable and this is having an impact on staff wellbeing. It is essential that staff wellbeing issues are addressed and that staff are properly supported both in terms of workload and from pressures that they receive from applicants and the wider community. Croydon's Planning service is only as good as the staff who work in the team and so it is important that staff retain the motivation to do a good job and are valued.
- 1.5 There are some real positives that can be built upon. Councillors recognise that they are on a learning journey with officers. Councillors understand how they can benefit from further training, benchmarking with other councils, and mentoring so that the Council's strategic priorities can be delivered through sound and defensible policy making and decision making. In the same way, Croydon has a team of very dedicated managers and officers who are highly professional and knowledgeable.
- 1.6 The review of the Local Plan is making very effective and significant progress. Croydon also has a good track record of adopting and delivering local plans and in policy making generally. There is clearly a need to review the policy direction following the change in political administration. This needs to be undertaken in a collaborative way to avoid significant delays in the plan making process and subsequent potential unintended consequences of reduced local decision-making powers.

- 1.7 The decision to both review the Local Plan and to revoke Supplementary Planning Document 2 (SPD2) is a significant one. The peer team understand one of the key drivers for revoking SPD2 is to address the unpopular policy on suburban intensification and to address community concerns on the impacts of the guidance on the character of the area. The peer team considers it is really important that an appropriate replacement to SPD2 is progressed as a matter of urgency as set out in the Cabinet report of 22<sup>nd</sup> June 2022 to ensure there is continued consistent decision-making.
- 1.8 There are a number of quick wins that can be delivered to enable officers to be more efficient and meet customer needs. The current validation process is clearly not working and a decision needs to be made on the direction that the Council wishes to take to increase the speed of validation. Enforcement is also clearly not meeting community expectations. It is important that officers and councillors work together to ensure that workloads can be effectively managed, that the service clearly communicates to the wider community its priorities and sets realistic expectations of the powers the council has to enforce Planning regulations.
- 1.9 The Council is currently being significantly constrained by its ineffective IT systems. Officers are wasting valuable time working with inefficient and unreliable IT. This covers a range of software usage but there is particular concern from the peer team that the Council does not use the Uniform Planning software system to its full capabilities. The IT issues are a Council-wide problem and must be addressed corporately.
- 1.10 In order that the Planning service recovers from its current precarious position it should be on the front foot with regard to positive community engagement. The perception from many about the Planning service is of a lack of transparency, bias and inefficiencies. Evidence does not support this view, but the service has to accept that it has a job to do to change these perceptions. It could start by instigating a more effective communications strategy. There are very knowledgeable and active community associations in the borough, and a lot of social media speculation. The Council must avoid being drawn into responding to speculation, but should be more positive in its use of communications and social media. For example it could communicate how it learns from experience, how decisions are made in a transparent way, and it could agree to improve customer response rates with the users of the Planning system. It could also communicate the benefits of a quality planning service, such as providing housing, jobs and associated infrastructure, through CIL and s106 receipts. The Council needs a communication strategy to demonstrate how it will communicate positive messages and have positive engagement with the knowledgeable and active community groups.
- 1.11 It is clear that the Planning service is not the only service in the Council that is struggling for resources. The shortage of staff among the Council's key consultees for Planning applications is impacting on the ability to make Planning decisions. The peer team suggest that more focus should be given by consultees to allow the Planning team to help themselves through the use of standing advice, protocols for engagement, and improved training for Planners.
- 1.12 Whilst planning application fees are fixed nationally, pre-application and Planning Performance Agreement (PPA) fees are negotiable and when the service engages effectively in this way it is productive and appreciated by applicants. The Council needs to look at how it can maximise this income stream and the potential for it to be used to better resource the Planning service. Pre-applications are also looked at with cynicism by some in the community as a way of agreeing Planning matters 'behind closed doors'. This perception needs to be addressed and there is a great opportunity for not only increasing income but for better communicating the role of

through pre-applications and PPAs as well as selling the benefits of pre-application engagement with the wider community.

- 1.13 The Planning service also needs to be aware of changes in the Planning system that are coming forward through the Levelling Up and Regeneration Bill. Whilst the details are still being considered in Parliament, the Planning service needs to ensure that it is ready for these changes. For example, the proposed changes to the Local Plans adoption process and the digitisation programme must be factored in as part of Croydon’s plans for the Planning service.
- 1.14 The overriding issue facing the service is a lack of planners and support staff to carry out the Planning function effectively. Undoubtedly, the Planning service is under resourced. Increasing resources needs to be a primary action to avoid the Planning service breaking. However additional resources need to be coupled with a clear plan on how the Planning service will be rebuilt, drawing on the existing best practice, better engaging with its customers and changing practices where they are needed. With this clear plan the peer team considers that Croydon Council’s Planning service has every chance of providing an excellent Planning service that makes sound, timely and defensible planning decisions that meet the priorities of its communities and those wishing to invest in and deliver development in the Borough.

## 2. Key recommendations and findings

- 2.1 There are a number of observations and suggestions within the main section of the report. The following table summarises the key / priority recommendations and more detail can be found in the main body of the report. These recommendations need to be brought forward alongside a review of resource capacity, the Development Management process review work, councillor training and other wider corporate improvement work so that it forms part of a wider package of improvement for the Planning service.

<b>1.</b>	<b>Review the Planning Service</b> as part of a Corporate transformation/improvement Plan. The Council should be mindful of the consequences of under resourcing the service and recognising the income generation potential of Planning. A focus also needs to be given on promoting the outcomes of a good planning service – the creation of housing, jobs, infrastructure to benefit existing residents - to counter-balance the current negative view of planning.
<b>2.</b>	<b>Improve the engagement with residents, partners and developers.</b> Consider additional communications resource and a strategy to counter the negative narrative that has become the norm including Inside Croydon and embrace residents’ desire to get involved and work with Planning so that it is a positive and collaborative relationship.

3.	<p><b>Develop a strategy for effective engagement and communication to rebuild trust with local communities that works alongside the Plan Making engagement process.</b> This should involve a range of initiatives that are agreed and communicated through the community networks and Member engagement and could include:</p> <ul style="list-style-type: none"> <li>• The establishment of a learning through experience process to better understand both positive and negative community feedback so that officers can better engage with communities in the future</li> <li>• Carry out well publicised quick wins through improvements to the accessibility of the website and improved customer response times</li> <li>• Better communicating how the Council ensures transparency in decision making and other conflicts of interest</li> <li>• Improve communication with the development industry through a greater focus on local agents and re-inforcing the importance that is already being given to the developer forums</li> </ul>
4.	<p><b>Learn from best practice elsewhere</b> and use PAS as an option for member and officer training. In particular consider mentoring options for key councillors and officers so that they can be provided with an outlet for discussing approaches to the very significant issues that are being encountered in Croydon on a day-to-day basis. This should be coupled with a wider staff retention and development strategy including the promotion of the positives/benefits of working for Croydon and providing clear paths that allow staff to develop themselves within the organisation</p>
5.	<p><b>Utilise the willingness on all sides to re-set relationships and trust between officers and councillors.</b> This should be focused in particular on:</p> <ul style="list-style-type: none"> <li>• Working together on creating more productive and collaborative Planning Committee meetings where councillors and officers work together to make sound and defensible decisions</li> <li>• Working together to review the existing Planning Committee code and scheme of delegation so that the community has their right to be heard whilst still enabling the Council to meet wider requirements on speed, quality and delivery. For example, the management of the Planning Sub Committee appears to be confused for all participants in its operation</li> <li>• Allowing officers to work more efficiently to meet targets based on speed and customer needs</li> <li>• Having a better engagement with internal and external consultees and residents</li> <li>• Agreeing ways in which investment in the Planning service will deliver the greatest benefits</li> </ul>
6.	<p><b>Empower officers and councillors to work together to review the Planning policy direction of the Council.</b> Officers should work collaboratively with the Mayor, Cabinet, other councillors and the wider community on the Local Plan Review and future supplementary planning documents. The opportunity for a policy review will give a unique opportunity to build relationships between officers and members by finding common ground and an understanding on how Croydon’s approach can align to national and London wide policy approaches. It will also ensure that all sides understand the consequences of any policy review. Councillors should be guided by officers on how such changes can take place whilst still retaining strong decision-making powers.</p>

7.	<p><b>Review the Council’s approach to validation</b> so that there is a clear understanding, rationale and messaging on Croydon’s approach to validation that provides an appropriate balance between speed and quality. Whichever approach is taken it needs to be appropriately resourced to meet Government targets on speed of decision making and customer / community expectations.</p>
8.	<p><b>Review the current IT investment as part of a wider transformation programme.</b> The Council needs more efficient processes and to avoid wasteful use of officer time. In particular there needs to be a focus on the ease to which officers can access different sources of essential Planning information. IT should be used as an enabler, and the focus should be on getting the most out of the current Planning software systems (Uniform) to ensure that it meets the requirements of all users. Benchmarking with other London boroughs and beyond will greatly assist Croydon in this task and will help it improve its in-house knowledge. It should be linked to a review of the Council’s data standards and its approach to digitisation as part of the impending planning reforms. This will ensure that Croydon is aligned to national best practice and to ensure that Croydon keeps on pace with its obligations as part of the planning reforms.</p>
9.	<p><b>Carry out a joint initiative between councillors and officers to refocus and manage planning enforcement capacity and expectations.</b> There needs to be clear messaging to the community on the priorities for enforcement and the level of enforcement that can be achieved with the resources available. To assist with this the Council should undertake two specific areas of work:</p> <ul style="list-style-type: none"> <li>• Carry out a ‘blitz’ of existing cases to reduce the caseload and communicate clearly the reasons why some enforcement cases will be pursued and why others will not.</li> <li>• Undertake well publicised and targeted enforcement initiatives that demonstrate clear action and identifies the areas of enforcement that are being prioritised by Croydon</li> </ul> <p>In addition, Croydon could look to other Councils who deliver a high performing enforcement service to develop tools and templates to help the efficient management of the enforcement service.</p>
10.	<p><b>Work more effectively with consultees to better use the resources available to deliver timely and quality advice for decision making.</b> This should include:</p> <ul style="list-style-type: none"> <li>• Focusing where appropriate on developing standing advice, template responses and officer training so that planning officers can make better informed decisions without the need for consultee advice in all cases</li> <li>• Make better use of consultation surgeries and regular catch-up meetings to ensure more timely and consistent responses are provided</li> <li>• Agree clear protocols on when consultee advice is needed and timescales for delivering the advice</li> </ul>
11.	<p><b>Refocus pre-application and PPAs procedures to provide better service to customers and maximise income.</b> Relevant officers should join the national PAS programme on best practice in pre apps and PPAs so that they can share best practice from Croydon as well as learning from approaches taken elsewhere in the country</p>

<b>12.</b>	<b>Cultivate the excellent best practice that is already being shown with the “Cobra” officer meetings</b> so that a clear steer is given by the senior officer management team on the approach that should be taken for strategically important development proposals. This consistent and considered messaging should be owned by the political leadership of the Council to foster improved officer / councillor relations. Cobra meetings should also be used as a way to allow more junior staff to develop their skills and understanding of the strategic direction of the Council so that future leaders can be developed and encouraged.
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### 3. The peer challenge approach

#### The Peer review team

3.1 Peer challenges are delivered by experienced elected councillor and officer peers. The make-up of the peer team reflected the focus of the peer challenge and peers were selected based on their relevant expertise. The peers were:

- **Marilyn Smith** - Head of Planning and Assurance, Inclusive Growth, London Borough of Barking and Dagenham
- **Cllr Ian Ward** – Leader Birmingham City Council.
- **Shelly Rouse** – Principal Consultant, LGA / Planning Advisory Service.
- **Peter Ford** – Peer Challenge Manager: Principal Consultant, LGA / Planning Advisory Service

#### The Planning Advisory Service (PAS)

3.2 PAS is a Local Government Association (LGA) programme which is funded primarily by a grant from the Department of Levelling Up, Housing and Communities (DLUHC).

3.3 It is our principal mission to ensure that local planning authorities (LPAs) are continuously improving in their execution and delivery of planning services.

3.4 To achieve this, the PAS work programme focuses on:

- Helping local government officers and councillors to stay effective and up to date by guiding them on the implementation of the latest reforms to planning.
- Promoting a ‘sector-led’ improvement programme that encourages and facilitates local authorities to help each other through peer support and the sharing of best practice.
- Providing consultancy and peer support, designing and delivering training and learning events, and publishing a range of [resources online](#).
- Facilitating organisational change, improvement and capacity building programmes - promoting, sharing and helping implement the very latest and best ways of delivering the planning service.

3.5 PAS also delivers some of its services on a commercial basis including change and improvement programmes for individual and groups of planning authorities in England, Scotland, Wales and Northern Ireland.

#### Scope of the review

3.6 The scope of the review was developed following initial conversations and correspondence with Croydon Council as well as consideration of the background documents supplied to the peer team in advance of the review. These helped the peer team to shape their focus of the

peer challenge around the following five core components as they relate to the functioning of the shared planning service. The peer team feedback is presented against these five key themes.

- Vision & Leadership
- Management and resources
- Working with Members
- Community and partnerships
- Outcomes and delivery

3.7 Croydon Council also asked that PAS provide a view on the following additional areas in its considerations against the main themes listed above:

1. Analysis and evaluation of development management performance. This should include a review of the efficiency and effectiveness of decision-making arrangements in relation to speed, quality and outcomes.
2. Consideration of the effectiveness of the respective roles of officers and members in presenting and determining planning applications at the Council's Planning Committee. This will include the quality and effectiveness of the officer reports to aid decision making by Members.
3. A review of the Council's current scheme of delegation in ensuring that appropriate applications are being brought to Planning Committee for decision making. This will also look at any bottlenecks in timely decision making that the current scheme of delegation may be causing.
4. A review of how the Council manages post decision matters in terms of processes and staff resources. In particular this relates to the management of the enforcement processes within the Council.
5. Consideration of the effectiveness of the Council's current response to complaints about the Development Management service and strategies that the Council may want to employ to reduce both the volume of complaints and the resources taken to deal with individual complaints.
6. Consideration of the current structures to meet the volume and type of Development Management work carried out by the Council

3.8 Some of the matters outlined in para.3.7 are detailed in nature and therefore the Peer Challenge forms part of a package of support that PAS is currently providing for Croydon. PAS is also preparing a Development Management process review that is looking in greater detail at Development Management performance and the processes and procedures followed by Croydon to deliver its Development Management function. On 20th June 2022 PAS also delivered a training session to the Croydon Planning Committee looking at defensible decision making.

### The peer challenge process

3.9 Peer challenges are improvement focused and it is important to stress that this was not an inspection. The process is not designed to provide an in-depth or technical assessment of plans and proposals or to undertake a forensic analysis of services. The peer team used their experience and knowledge of local government to reflect on the information presented to them by people they met, things they saw and reviewed this through a strategic lens. The Peer challenge has been designed to add value to a council's own performance and improvement plans.

- 3.10 The peer team prepared by reviewing a range of documents and information, including a position statement prepared by Croydon, to ensure they were familiar with the planning service and the challenges it is facing.
- 3.11 The team carried out the core of the review onsite over 3 days. As well as in-person, some meetings were held virtually before, during and after the onsite review. During this time the team gathered information and views from approximately 60 people, in addition to further research and reading.
- 3.12 This report provides a summary of the peer team's findings. In presenting feedback, they have done so as fellow local government members and officers. By its nature, the review represents a snapshot in time. The peer team appreciate that some of the feedback in this report may touch on things that Croydon is already addressing and progressing.
- 3.13 The peer team has presented a verbal summary of this report and recommendations to an audience made up of those that took part in / were interviewed as part of the review.
- 3.14 The peer team would like to thank councillors, staff, community representatives, customers and partners for their open, honest and constructive responses during the review process. All information collected is on a non-attributable basis. The team was made to feel very welcome and would especially like to mention the invaluable assistance and excellent onsite support.

## 4. Context and background

- 4.1 The Peer Challenge was undertaken against the context of the recent financial constraints imposed on the Council. In October 2020 Croydon Council issued a S114 Notice setting out that it was unable to set a balanced budget. As a result the Croydon Renewal Plan was commissioned in November 2020 that set out a financial recovery plan to help the Authority take the first steps to becoming an efficient, effective and financially sustainable Council.
- 4.2 The Croydon Renewal Plan assisted in the discussions with Central Government to secure the Capitalisation Direction from Central Government with an aim to the Council setting a balanced budget within 3 years. Croydon also has an Improvement and Assurance Board in place to provide assurance to Government and the people of Croydon on the implementing of the changes required.
- 4.3 As a result of the Council's precarious financial situation the Council made 15% cuts to the staffing establishment in June 2020, which resulted in a reduction of 5 posts across the grades in the Development Management team. In addition to this, the team was also required to let their remaining 4 contractors go with no notice period. This reduction in resource was in addition to the 2017 restructure with savings made from the reduction of technical support post and an enforcement post.
- 4.4 Prior to the May 2022 elections the Council had a Leader and Cabinet model and was under a Labour administration. Following a referendum in Autumn 2021 Croydon residents voted to change to a directly elected Mayor model in a governance referendum to determine how the council will be run. In May 2022 the elections were held to elect Croydon's first directly elected Executive Mayor and Ward Councillor elections. The election results returned Jason Perry (Conservative) as Croydon's first directly elected Executive Mayor, and the ward councillor elections (and the subsequent by election at the end of June 2022) returned a politically balanced council of 34 Labour, 33 Conservative, 2 Green and 1 Liberal Democrat councillors.
- 4.5 Planning policy development is led by the Plan Making Team – Spatial Planning and the Council currently has an up-to-date development plan for the plan period up to 2036 comprising the:

- Croydon Local Plan 2018
  - South London Waste Plan 2012
  - The London Plan 2021
- 4.6 The Croydon Local Plan was prepared and adopted under the previous administration. The Spatial Planning Service was in the process of undertaking a partial review of the Local Plan following the adoption of the London Plan in 2021. The Local Plan partial review had been out to consultation at Regulation 18 and Regulation 19. The partial review of the Local Plan has been paused due to the political commitments made by the Mayor, new administration and a new Local Plan Review programme will be published in due course. The Mayor made a political commitment to revoke the Croydon Suburban Design Guide – Supplementary Planning Document (SPD2) and the SPD was revoked by the Council on 25<sup>th</sup> July 2022.

## 5. Vision and leadership

### Leadership in the Planning Service

- 5.1 There are many strengths that can be seen in the way that the Planning service is led. Managers are clearly dedicated to providing a good Planning service for Croydon and this is replicated by a group of officers who work tirelessly to do the best job they can with the limited resources available. Clearly this is appreciated by some within the development industry and the peer team heard comments such as “Croydon has really dedicated officers who work well with us”
- 5.2 Through the Development Management process review work the team observed some excellent procedures in place that could be held up as best practice. For example, the officer reports are very well written with detailed analysis of the issues that are related to policy and well-informed recommendations that reach logical conclusions. The Development Management internal manual is very comprehensive and easy to understand, making it an essential compendium of processes for both new and more experienced staff to follow.
- 5.3 However the service is currently firefighting and losing. There is a feeling that the service is at the point of breaking and staff have developed a siege mentality brought on by the overriding pressure of high workloads. They have no headspace for finding solutions to the current predicament – any attempt to discuss solutions is met by the mantra “I haven’t got time!”. This situation is not limited to the planning service but is endemic across the Council. As a consequence there is a tendency for staff to be insular in their day-to-day work that is indicative of work pressures.
- 5.4 There is an urgent need for senior managers to step back and take a strategic approach to increasing resources and how to make the best use of currently available resources to improve efficiency across the service. In summary, Croydon’s planning service needs an Improvement Plan. There is a clear lack of staff resources in the planning service and elsewhere among services that support Planning. To avoid the service breaking there needs to be more resources put into the service alongside improved efficiencies. Both are needed and one cannot be effective without the other.

### Leadership and decision making at Planning Committee

- 5.5 The new Planning Committee is still establishing itself and it is perhaps a little premature to assess its effectiveness after only one Committee meeting (held on 16th June 2022). In discussions with Members of the new Committee it is clear that they are keen to learn from officers, each other and best practice elsewhere. They are committed to ongoing training and that it should include Ward councillors. This is perhaps illustrated by the good turnout and engagement of Members at the Planning Committee training led by PAS on 20th June 2022. It

is very encouraging to learn that the Chair of the new Planning Committee would like to use the offer of an [LGA mentor](#) as part of his own commitment to continuous learning and aspiring to best practice.

- 5.6 At the Planning Committee that the team observed there was a clear reluctance from councillors to support the officer recommendations on all four applications considered at the Committee because of the mistrust of some councillors to the guidance set out in SPD2 and the weight that officers attributed to the material planning considerations (see also see section under Leadership in Planning Policy below). As a new Planning Committee there is now the ideal opportunity for officers and councillors to work together in rebuilding mutual trust and improve the operation of the Planning Committee.
- 5.7 The peer team found the relationship between the main Planning Committee and the Planning Sub Committee particularly confusing. The scheme of delegation is set up so that applications of a smaller scale are dealt with by the Planning Sub Committee at the end of the Planning Committee meeting and this avoids the full Planning Committee having to deal with all planning application items. However, the peer team observed that the Planning Sub Committee was placed at the end of a very long Planning Committee meeting with a cut off time for business to be completed. If all the business of the Planning Sub Committee is not completed within this time the item is delegated to officers. Therefore, interested parties to a minor development might have to wait many hours for their item to be heard only to find, as was the case with the Committee the peer team attended, that the item was simply deferred to officers and not debated by the Committee. This would appear very unfair to all parties and sends the wrong message when Croydon Council is clearly trying to demonstrate inclusive leadership across the political parties that should result in open and transparent decision making.

#### [Leadership in Planning policy](#)

- 5.8 The new political leadership has expressed a clear desire to amend a key part of Croydon's existing policy framework and this relates to the policy of intensification previously outlined in SPD2. This has now resulted in a Council decision to revoke SPD2 so that issues of design and character can be given greater priority to matters surrounding intensification. Whilst there are clear political disagreements on the value of the policy on intensification (including as set out in Policy H2 of the London Plan 2021) it is notable that candidates from both Labour and Conservative at the recent Mayoral election recognised the need to change the current SPD2 guidance.
- 5.9 In order for this policy change to be made the Council needs a clear strategy on its response to the London Plan and how it will enact these changes whilst also maintaining sound and consistent decision making. The revocation of SPD2 by the Council has also instigated the production of a residential extensions and alterations SPD and it is acknowledged design guidance will be required in due course linked to the Local Plan Review programme. However, the peer team was told by both officers and councillors that they were concerned about the soundness of decision-making relating to intensification in the short term while the SPD is being reviewed.
- 5.10 The revocation of SPD2 is a major opportunity for the mayor, councillors and officers to come together to rebuild trust and ensure that SPD2's replacement creates confidence in sound decision-making that has the support of the wider community. It also creates the opportunity to de-politicise Planning through strong cross-party leadership led by a Mayor who can foster co-operation and identify common ground.

- 5.11 With regard to Planning policy direction Croydon must be careful not to let areas of disagreement with the current Local Plan 2018 and Local Plan Review overshadow the many areas where there is already agreement. Croydon has an excellent record of Planning policy making and the current Local Plan has reached Regulation 19 consultation stage. It is really important that the need to review does not send the Local Plan process back to Regulation 18 stage which will add a significant period of time / delay to the plan making timetable. Until the Local Plan is adopted there is a potential for Local Plan 2018 policy to become dated – a lack of up-to-date policies which affects the independence of the decision making of the Council. This may have unintended consequences for delivering and achieving the development outcomes that the Council desires. When there is a dated policy context more reliance will be given to the London Plan and to the National Planning Policy Framework (NPPF) national policy.
- 5.12 In the same way SPD2 is clearly considered by the ruling administration as not being fit for purpose and this has now been confirmed through a Council decision. It is important that the Council agrees how the guidance in SPD2 needs to change and ensure that the right guidance is in place that balances the need for housing delivery against qualitative issues such as character, design and densities. The statutory requirements for the adoption of supplementary planning documents is likely to change through the Levelling Up and Regeneration Bill with the requirement for an independent examination. This will inevitably extend the process of adopting future supplementary planning documents if the Bill is passed as currently worded. Officers, councillors and the wider community need to work together on achieving the objectives in revoking SPD2 and need clarity of expectations, beyond the recommendations set out in the report to Council on 22<sup>nd</sup> June 2022 regarding the revocation of SPD2.

## 6. Management and resources

### Quality and quantity of staff

- 6.1 The Planning service has many excellent staff who are extremely knowledgeable, act very professionally and are clearly committed to providing the best service they can for the residents of Croydon. This was the conclusion drawn from the clear, considered advice provided at Planning Committee and the evidence from written material such as the officer reports. This level of professionalism was further borne out by feedback from some of the developers interviewed as part of the peer challenge. The peer team heard comments such as “Croydon is one of my favourite Councils to work with”. The staff structure set up also appears sound with clear lines of management and team structures in place. The peer team understands that Croydon formally had a Strategic Applications team leader who would drive the key strategic projects at the Council. Due to budget cuts the peer team understands that this post was deleted but has been reinstated within the Central Team. As Croydon has significant regeneration opportunities it is important that this dedicated resource to drive growth is retained alongside the “Cobra” management meetings.
- 6.2 Notwithstanding the positive feedback from some users of the Planning service there were also many negative comments and these largely focused on the lack of communication. This was usually levelled at response issues illustrated by comments such as “the officer never returns my call” or “there is no point in emailing because I never get a response”. Linked to this issue a clear symptom was revealed by the Development Management process review that staff are currently significantly overworked to the point that it is not only impacting on customer service but is also having an impact on the wellbeing of staff. Workloads for individual staff are

unmanageable and cannot be sustained. This was clearly acknowledged by many of those who levelled criticisms at the Planning service.

### Validation process

- 6.3 Croydon has made a conscious decision to move validation from a Technical Support function to a Planning Officer function. The peer team understands that this decision was made to create a more customer focused response to validation whereby the case officer 'owns' the planning application from beginning to end. However, the peer team was also told that, due to the need for budget savings, the planned increase in resources within the Planning Officer teams to manage validation was not possible. The approach of Planning Officer validation is followed by other Councils very successfully. However, in reality it has significantly slowed the validation process from a quick (within 5 days) process to an elongated (6 weeks plus) process that is taking a significant amount of officer time (we heard up to 50 per cent of an officer's time) and causing a crippling impact on the speed of decision making. In addition, the time taken to validate severely impacts the time left for an officer to make a recommendation. The peer team understands there are currently 31 appeals because a decision was not made within the statutory time limits. This in turn causes more work for the officers by having to deal with the appeals.
- 6.4 The validation process is therefore not now meeting customer service expectations, resource efficiencies or timeliness and it must be reviewed as part of the wider review of the Planning service. More detail on validation is covered in the separate PAS Development Management process review report.

### Use of IT resources

- 6.5 The peer team heard that one of the major inefficiencies identified in the Planning service was in the use of IT. Case officers told the peer team that they had to go to a number of different sources to do a simple constraints search for a planning application because information is kept on different GIS sources or other separate databases. In the same way planning histories are retained on different formats with information still retained on microfiche, paper files etc. These inefficiencies are significantly increasing the time officers spend on simple searches due to the dispersed nature of the information when their workloads are already causing wellbeing issues.
- 6.6 As with most other London boroughs Croydon uses the Uniform software system to manage its planning applications. However, Croydon does not use Uniform to its full capacity. For example the project management tool known as Enterprise has been purchased but officers do not use it and use duplicate resources such as spreadsheets to manage their workload. When questioned why staff do not use Uniform to its full capacity the reason appears to be that there is a lack of knowledge among staff of the extra functions or if staff do understand it they work in other parts of the service and have insufficient time to work on the Uniform system. The peer team understands that there is a lack of knowledge and / or time to dedicate the resources to properly invest in the Uniform system.
- 6.7 It is clear that at present staff simply do not have the time to improve the IT capabilities within the Planning service and they need the support from outside the service to make the improvements they need. The service cannot afford *not* to invest in IT efficiencies and training because one of the causes for the unacceptable workloads is due to the time staff are spending on tasks that should be straightforward. The peer team considers that the only way to break out of this cycle is to invest in IT improvements and training staff as part of a wider Council

transformation programme alongside calling upon support from other London boroughs to make best use of the Uniform system.

### Planning enforcement

- 6.8 Planning enforcement is a clear political priority in Croydon and the expectations of both councillors and the wider community with regard to response times and action are not being met by Planning Officers. The peer team understands that there are 4.8 Planning Enforcement Officer posts on the staff structure, but it has proved very difficult to recruit to key posts such as the Deputy Team Leader. This is causing a significant backlog of cases with each officer having over 150 cases and over 300 currently unallocated. The peer team was told that one of the main reasons for this backlog of cases is due to the number of complaints being generated over construction management and on-site problems, which need a speedy response but is currently being strained through a shortage of staff.
- 6.9 The PAS Development Management process review report provides more information about planning enforcement capacity issues. The peer team considers that the current arrangements are simply not fit for purpose and the current Enforcement Policy needs updating to address key enforcement priorities. Separate to the Council's ability to recruit more officers the peer team considers that there are two initiatives that the Council can implement to redress the clear tension over enforcement.
- 6.10 **Carry out an enforcement 'blitz'** – In order to bring the number of cases down to a manageable level officers need to take a robust approach to prioritising the existing enforcement against the existing enforcement policy. They also need to take the decision to close those cases where no further action should be taken because there is minimal harm or where there is either no breach of planning, where it is not expedient to take action or where limited public interest in taking further action. Action from this 'blitz' should be agreed with and then owned and supported by councillors and followed up with regular reports to relevant councillors on prioritisation and workloads either through a regular Planning Committee reporting mechanism or other councillor meetings.
- 6.11 **Undertake targeted enforcement initiatives** – once the 'blitz' has been carried out to remove non-cases, targeted initiatives could focus on subject areas of particular concern for Croydon where a targeted campaign could deter others from carrying out similar action. Such initiatives would be a clear demonstration of the impact of planning enforcement action and in turn reduce officer workloads in the longer term. It would be important that councillors are involved in the prioritisation of these enforcement initiatives and work with officers to collaborative working as well as allowing councillors to understand better the process of taking appropriate and proportionate enforcement action.
- 6.12 There is the opportunity for Croydon to look to other London Boroughs to find good planning enforcement practice for learning and best practice. In particular the Council may want to seek support from [Brent](#), [Ealing](#) and [Barnet](#).

### Internal consultees

- 6.13 The support provided to the Development Management process by internal consultees appears to be very variable and slow responses by some consultees are causing a bottleneck with the issuing of planning decisions. Some agents see case officers as being merely the 'post boxes' for consultees and would like to see them supported to use their skills as Planners to negotiate solutions to problems. It is important that junior staff who perhaps lack experience are

supported and given the confidence to work with consultees on finding solutions to objections or deciding when a consultee comment is critical or just desirable.

- 6.14 Lack of resources is a Council wide problem and the current financial predicament the council finds itself in means that it is unclear exactly when it will be in a position to invest in the service to address the recommendations in this report. The Council will need to come to a view whether to invest to save in the planning service bearing in mind that efficiencies alone are unlikely to halt the service from breaking. This can come from various sources. Examples include:
- Creating standing advice from specialists on the more straightforward applications so that case officers can make their own judgements;
  - Surgeries that specialists run so that verbal advice can be provided quickly on more straightforward applications; and
  - Template responses from consultees to minimise the time that specialists need to take to provide advice.
- 6.15 The peer team heard from one consultee who had considered the options outlined above and agreed that all three would significantly help with managing their workloads and performance. However, the reason for not making progress was because staff were too busy to do anything other than respond directly to planning application requests. The peer team considers that because of the work pressures internal consultees cannot afford *not* to work with the planning team and introduce improved ways of working otherwise the workload pressures will not reduce, performance will continue to be poor and staff wellbeing will suffer accordingly.
- 6.16 It is also important that case officers are given the opportunity to develop their experience and confidence in a range of specialist areas rather than having to refer to the individual specialist. The ideas outlined in para 6.14 will help give staff increased confidence to interpret standing advice provided that this is supplemented by training from the specialists concerned. The areas of expertise where this is perhaps most relevant is in assessing transport and flood risk impacts. It would also be helpful if it was clearer when reference to specialists was required and when case officers should use their own judgement, similar to the current process between Spatial Planning and Development Management. This could be in the form of a simple consultation protocol giving trigger points for consulting specialists, when reference to consultees is a statutory requirement etc. The peer team heard that the Transport Officer was consulted on 'virtually every application just in case'.
- 6.17 Support from Legal officers was raised as a concern by some of the individuals interviewed by the peer team. Due to staff cuts legal advice is largely outsourced at Croydon. Outsourcing of advice in this way is very common throughout the country, particularly in smaller Councils, and is often an appropriate response to creating savings rather than the Council employing its own Planning lawyer. However, the peer team heard that there are concerns in how the legal service is being provided for in Planning. In the peer team's experience it is usual for a Council of the size of Croydon to be able to sustain its own in-house Planning legal support. The peer team heard no criticism of the quality of service, but there were concerns expressed by a number of sources within the Planning service that the legal advice was under-resourced and the internal administrative processes were slow. Of particular concern was the lack of a consistent legal presence at Planning Committees and to support the appeals process. These two areas are critical for the efficient and effective decision making at any Council and without robust and timely advice there is a significant risk to the reputation of the Council as well as a significant financial risk.

- 6.18 Further consideration of the role of internal consultees is outlined in the Development Management process review report.

#### Management of complaints

- 6.19 A significant amount of senior officer time is spent on responding to formal complaints. Planning has some of the highest number of complaints within the Council and some of the poorest response rates. There are also a number of individual complainants who take up a disproportionately large amount of officer time. Due to the number of complaints received the peer team was told that this takes a very significant amount of management time, particularly for the Head of Development Management and there is an officer whose workload is almost entirely taken up with the administration of complaints.
- 6.20 The local community and stakeholders who are impacted by the Planning process in Croydon have the right to make a formal complaint if they feel aggrieved about the Planning service. However, it was noted by the peer team that the Planning team has been able to address issues raised by complainants without any significant actions required by the Local Government Ombudsman. Unfortunately, the fact that Croydon needs to dedicate so much management time and a member of staff to deal with complaints means that staff resources are being diverted to complaint handling rather than other, more positive work. Consideration on solutions to the resource issue is outlined in section 7 of this report (Community and Partnerships).

## 7. Community and partnerships

- 7.1 The Planning service has fostered some good relationships between individual officers and external partners as well as some community groups. The peer team heard some very complimentary comments about the professionalism and responsiveness of particular officers. Some of Croydon's major developers and statutory consultees are impressed by the professionalism of officers and their engagement in progressing Major applications to delivery stage.
- 7.2 The peer team also heard about good practice in engagement of the customers and users of the Planning service. This includes the continued operation of a local agents' forum and regular liaison with residents' groups. The peer team heard that both councillors and officers are committed to rebuilding the trust that has been lost with the local community in recent years. Officers acknowledge that engagement with local agents has deteriorated recently with a lack of communication and engagement in resolving Planning issues.
- 7.3 Notwithstanding good practice between individual officers and users of the Planning service the general feedback heard by the peer team was that relationships between the service and the local community has significantly broken down resulting in a lack of trust. To a lesser extent this has permeated into a lack of trust between officers and councillors. The peer team heard that the service needs to get the basics right - answering the phone, replying to emails, engaging with the public etc. Undoubtedly much of the problem is due to overwork leaving a lack of time to engage. It has created an atmosphere of suspicion around the Planning service where lack of communication is being perceived by some in the community as an attempt to hide poor practice and exercise bias – something that is being perpetuated by some community groups through the use of social media. The peer team found no evidence of bias and officers have a clear understanding of the Planning process working in an objective manner. However, the

circumstances they are working under as outlined above is hampering them taking a more proactive approach to addressing some of these perceptions. As a consequence, the peer team consider that the Council should give serious thought to how it communicates and engages with the public to counter the negative perspective of some media outlets in Croydon.

- 7.4 Currently individual officers in the Planning Service feel very vulnerable to personal attacks from social media and this is unacceptable for any Council employee to experience. The peer team considers that the matter needs to be addressed through a Council wide solution on support to individual employees.
- 7.4 An example of something that fosters mistrust is Croydon's policy not to publish planning application public comments on its website – something most Planning Authorities do. The reason for this is concern about data protection as the service does not have the resources to check all comments and redact issues that might breach data protection law. Some members of the public see this approach as proof that Croydon is not transparent and open about objections to planning applications.
- 7.5 The Planning service needs to (and wants to) proactively address issues of mistrust and accusations of defensiveness and rebuild trust between officers, councillors and the wider community. The positive message that the Peer team heard was that officers, councillors, local agents and residents' groups were all fully committed to building back trust and working together. This is an excellent starting point and should be embraced by all concerned. Outlined below are some of the ways the Peer team feel that this positive approach can be achieved.

#### Engagement with residents' associations

- 7.6 Croydon is very fortunate in having a group of very engaged, knowledgeable and active residents' groups. The Council could better engage with the established groups to help the Planning service understand the issues that the local community has with certain developments. An open and positive engagement will help developers understand local issues and better enable them to articulate how they can address the public's concerns so that the Planning Committee can make better informed decisions. There is already regular liaison between residents' associations and officers and this is an excellent start, but this can be extended. If residents' associations understand better the Council's position on planning applications, they can communicate this to their residents and work more collaboratively with the Council.
- 7.7 As outlined in paragraph 7.3 the good work of Croydon's Planning service is being undermined by informal comment and criticism. However, the peer team did not hear about the good news stories that are coming out of Croydon's Planning team. Positive news should be able to drown out negative reports if managed correctly. There could be regular reporting on such matters as:
- Progress in Planning policy making e.g. listening to residents in revoking SPD2
  - Reports on the positive decisions being made at Planning Committee - £X of value from planning decisions made, community benefits being delivered as a consequence of planning decisions, etc
  - X number of housing delivered in the borough
  - The community benefits derived from developer contributions, such as CIL and s106

### Pre-applications and Planning Performance Agreements (PPAs)

- 7.8 Croydon is praised by some developers as having a very engaged PPA process whereby the Council engages effectively with developers to bring forward major developments through a collaborative PPA process. However, the peer team also heard that that pre-application engagement for smaller development proposals is often “was not worth the paper it is written on”. Once again it appears that there are good processes used by the Planning team and when it works well it is greatly appreciated. However, the implementation is variable and often stifled through lack of time and resources.
- 7.9 The inconsistent approach to pre-application engagement is impacting on income generation and performance at Croydon Council. A significant opportunity is being missed in not generating income when developers clearly are willing to pay for a good service. Agents tell the peer team that the only reason why they make pre-application enquiries is because Croydon has a policy of not negotiating on live planning applications if no pre-application is submitted, but they do not value the quality or timeliness of the advice given. However, the peer team also heard that planning applications are significantly delayed at validation stage because case officers are negotiating improvements to the quality of submissions before validating. Therefore, officers are in effect providing a pre-application service for free in some cases to improve the quality of submissions. Income in the form of PPAs can be particularly effective in generating income and the peer team heard that developers want to enter into PPAs with the Council and potentially pay for additional officer support. However, the Planning team has not been able to find the time or support for resources to support a PPA approach.
- 7.10 Best practice in pre-application engagement encourages residents’ associations to be actively involved at the pre application stage. Understandably an applicant is often reluctant to share early iterations of their plans with the wider community, but the peer team heard that there is a mistrust by councillors and residents that officers are agreeing proposals ‘behind closed doors’ and making decisions without public scrutiny. Many developers would welcome engagement with the public and councillors at the right time prior to the submission of a formal application as it helps to de-risk a project and to understand likely objections. Current resource issues at Croydon make such engagement difficult at the present time and the peer team does acknowledge that strategic schemes are presented to Planning Committee for comment at pre-application stage. However, the peer team also considers that wider community engagement should be a future objective for the planning service if it is to improve relations with the local community.
- 7.11 PAS is about to launch a national initiative to consider best practice in pre application engagement and this would be an opportunity for Croydon Planners to learn from others and develop their own best practice in pre application engagement.

### Learning through experience

- 7.12 The Planning service needs a process that allows it to learn from decisions and comments made about its Planning service and Planning Committee. There are a large number of complaints but also a significant number of compliments received. Appeal decisions are another good source of learning. One way of capturing and learning from decisions made is through a structured ‘learning through experience’ process. If a complaint is made, what could the Council do better to avoid that complaint being submitted in the future? If a compliment is made to the Council, then how can that be captured so that others can learn from the good practice? If an appeal is lost then is there a weak policy that needs to be reviewed? There are examples nationally where

a focus on learning through experience has significantly reduced the number of complaints received and seen increased performance as well as staff morale. Croydon may want to use Plymouth City Council as a case study where this learning has been used effectively. PAS can provide details on request.

- 7.13 The learning through experience process could also be a good way for councillors and officers to have a positive engagement in addressing community concerns. For example, it could be a good way for councillors to understand some of the key areas for complaint by local residents and officers and councillors could work together to improve communication and potential misunderstandings.

#### Agents and developer forums

- 7.13 The peer team heard that local agents and developers want to engage with the Planning service but get frustrated by the lack of communication and delays in the process. Undoubtedly this is due to work pressures rather than a willingness to engage agents and developers. However, a lack of communication is a false economy. Agents work for a client who is normally an infrequent user of the Planning service. An agent can be an extremely useful link between an applicant and the Planning Officer. The agent will understand (if not always agree) why delays occur and can explain that to their client. However, if they get no communication from the Planning Officer they can only relay to their client that no response has been received and this adds to the frustration, lack of trust and deterioration in confidence in the Planning team.
- 7.14 It is positive to hear that agents' and developer forums still take place at Croydon and the peer team understand that these happen every 6 months (subject to Covid restrictions). A positive engagement with developers and agents can improve understanding and also allow agents and the Planning team to work together in improving performance as a whole, for example through better quality applications and discussion on process efficiencies. A regular programme of meetings and a clear well-managed agenda keeps things focused and away from discussing individual applications.
- 7.15 As with agents, engagement with larger developers help the Planning team improve the service it provides. Developers and agents could meet together but developers are probably better engaged in more strategic matters such as understanding the strategic issues being promoted through the Local Plan, strategic development opportunities in Croydon and other Council wide initiatives that impact on the Planning process.

#### Transparency

- 7.16 In order for the Planning service to rebuild trust with the local community it must be more transparent about the way decisions are made and ensure that these are made in accordance with sound Planning practice. The peer team heard that there is a clear separation between the Council acting as a developer or development sponsor and acting (through the planning service) as the statutory Planning Authority. The peer team was told that Croydon deals with these conflicts of interest when considering Planning matters through the Council's Code of Conduct. However, the peer team was also told by community representatives that this is not being communicated effectively to the public and is therefore causing a lack of trust in the Planning process. Many Councils re-inforce their code of conduct with written protocol agreements when there is a potential conflict of interest on specific development proposals. The peer team shared with the Council an example of a protocol used by Plymouth City Council to address development related conflicts of interest.

## Quick wins

- 7.17 If trust between officers, councillors, applicants and the community is to be re-established, it is important that the Planning service implements some quick wins that demonstrate the Council is listening and properly engaging. The Planning team cannot do this alone as it is constrained by lack of time and resources. However, there are three suggestions that will help to quickly build back confidence and reduce the workload for officers:
1. **Website improvements** – use the website to help the wider community to find answers to their questions without the need to contact the Planning service directly. Use the website to promote the good work that is being carried out by Planning.
  2. **Improved customer response times** – make a commitment to respond within a certain period of time and in the format that the response will be given. If a response will not be given (e.g. response to a comment on a planning application) make that clear on the website. Be realistic so that the response times can be achieved and review as necessary.
  3. **Proactively reduce the planning applications backlog** - seek quick solutions for all those planning applications that have had no action for more a number of months so that caseloads can be reduced. This suggestion is developed further in the Development Management process review report.

## 8. Outcomes and delivery

- 8.1 The emerging and consistent theme that the peer team identified is that while the Council carries out many of its functions very well, the lack of resources means that there is no capacity to sit back, identify and implement changes that would enable it to deliver a more efficient and customer focused service. Without an increase in resources and changes in work practices it is unlikely that this position will change. Some of the impacts of this juxtaposition are outlined below with regards to delivery and outcomes.

### Planning application performance

- 8.2 Croydon's performance regarding speed of decision making has been of concern during the last couple of years and the next Government assessment period on speed of decision making will be for the two years up to end of September 2022. Currently Croydon is forecast to determine 77% of its Major planning applications in time against a national minimum of target of 60%. It is forecast to determine 71% of its non-Major planning applications in time against a national minimum of target of 70%. Therefore, Croydon's performance on non-Major planning applications is of particular concern. Furthermore, these percentage figures are heavily reliant on extension of time agreements (73% of Majors and 31% of non-Majors include an extension of time agreement).
- 8.3 Perhaps of greater concern is Croydon's performance on the quality of decision making. This is assessed by the number of planning application decisions that are subsequently overturned at appeal. The government has set councils a target that no more than 10% of applications should be overturned at appeal. Currently Croydon is significantly below this 10% threshold (i.e. a good thing). However, the peer team understands that 31 planning applications have been appealed against non-determination during the last year. If this trend continues then there is a significant risk that Croydon's record at appeal could be affected with the threat of Government intervention over the quality of decision making. Since the impacts of current decisions are

normally not realised until up to two years later (due to the timescales set for raising and considering appeals) the Council needs to be very mindful of the future implications of planning decisions and delays.

- 8.4 A detailed analysis of Croydon Council's performance on speed and quality of decision making is outlined in the Development Management process review report.

#### Planning Committee

- 8.5 The peer team found that Croydon has a sound scheme of delegation and code of practice notwithstanding the issues raised regarding the Planning Sub Committee outlined in para. 5.7. A more detailed analysis of the scheme of delegation and code of practice is highlighted in the Development Management process review. The Planning Committee meeting on 16th June 2022 was the first under the new administration and it is perhaps unfair for the Peer Challenge to judge the performance of the Committee based on this one meeting.

- 8.6 However, the outcome of the decisions made by the Planning Committee from this first meeting was a total of four planning decisions against officer recommendation. The Planning Committee is of course perfectly entitled to go against an officer recommendation where there are clear material planning reasons. However, the decisions are likely to result in a number of Planning appeals. As a consequence, further pressure will be put on staff resources and the possibility of upheld planning decisions. The Planning Committee will therefore need to be mindful of the need to make sound and defensible planning decisions. It is positive that councillors are keen to undertake training and learn from other high performing Planning Committees to ensure that they can use the Croydon Planning Committee as 'the shop window' of the Council for developers and the public looking to see fair and sound decision making.

#### Plan making – Spatial Planning

- 8.7 The process of the Local Plan Review to date has been an example of good plan making. The peer team found a group of officers who are both dedicated and knowledgeable to deliver the plan making and development requirements of the Borough.

- 8.8 The Council's revocation of SPD2 in July 2022 means that work is in its infancy for a replacement residential extensions and alterations Supplementary Planning Document. There is also an acknowledgement that further design guidance would be required in due course linked to the Local Plan Review programme. At this stage, it is unclear of the extent to which the Local Plan should be amended from its current Reg 19 status. A major review of the Local Plan could result in the Local Plan process being put back further to Reg 18 stage. This could have significant implications on the weight of the policies in the Local Plan and potentially weaken the Council's position in being able to make its own decisions on contentious planning matters. This is clearly not a position that the Council will wish to find itself and therefore it is essential that the Mayor / councillor / officer relationship remains strong so that the political commitments can be delivered successfully. Planning officers need to have a clear message from the Mayor and Cabinet as to the way forward, and this also needs to be clearly expressed to the public.

#### Community Infrastructure Levy (CIL) and S106 obligations

- 8.9 The CIL and S106 planning obligations processes draw in significant community infrastructure benefits from planning decisions. However, the peer team found that the processes employed by the Planning service to collect and manage these payments were convoluted and inefficient with multiple handling by officers, notwithstanding long-standing process maps and procedures being in place. At this stage resource levels are more stable, so the peer team heard an

intention to undertake a comprehensive review of the historic process maps and procedures. Furthermore, there appeared to be very little awareness by the wider community on how the money was being spent and the benefits of the infrastructure payments being made by developers to mitigate the impact of developments. However, the Council does annually publish its Infrastructure Funding Statement and has been reported twice in recent years to the Council's Scrutiny.

- 8.10 There is clearly a good news story for the Council to promote with the community to show how impacts of development are being offset by improvements for the wider community but there is little evidence of this good news story being communicated effectively. The peer team was told that Borough CIL income is being allocated to support the Council's Capital Programme and in accordance with the CIL Regulations.

#### 'Cobra' meetings

- 8.11 Croydon's management team holds regular officer meetings to discuss strategically important Planning issues to provide a steer on key development projects. This is best practice and an effective way for managers to support case officers in making key decisions on planning applications and ensuring consistency in decision making and approach. The peer team considers that these meetings should be safeguarded at all costs as they are a very effective use of management time. There could be a tendency for overstretched managers and officers to consider that they do not have the time to attend these meetings. The peer team considers that this would be a false economy and further re-inforce the perception by some stakeholders that the Planning service has become insular and disjointed.
- 8.12 The Cobra meetings are also be an opportunity for more junior staff to gain greater awareness of strategically important Planning issues and to develop their skills as the potential future leaders at Croydon. This is an example of good practice in developing staff in the organisation. Croydon, as with most Planning teams across the country, is finding recruitment difficult and therefore it is even more important to develop staff within the Council so that they can develop their skills and to encourage them to stay at Croydon Council.

#### Financial management within the Council

- 8.13 It is clear that Croydon is working under severe financial constraints and, as a necessity, spend is very carefully monitored and managed within the Council. However, the peer team heard that this is leading to the micro-managing of expenditure that the Planning team is required to go through which is taking up valuable officer time on detailed matters which in turn is impacting on delivery. For example, the peer team heard that the Planning team is unable to book rooms within the Council for the Local Plan examination as the examination will not be held until later in 2022 and therefore has had to go to an outside provider. It is important that prudent financial management does not harm delivery of key Council priorities that in themselves will save the Council time, resources and money.
- 8.14 Related to this is the practice the peer team heard on internal recharging. The peer team understands that officers who support the Development Management function recharge their time through an internal recharging process. The Peer team understands that there is a need for financial prudence to ensure that officer time is spent in a time efficient and cost-effective way. However, the transferring of money between teams / services / departments creates additional work for staff who are already pressured from high workloads. It might be more efficient for service level agreements be agreed with consultees so there is a clear expectation on time and resources that should be sent on Development Management work.

## Data standards and digitisation

- 8.15 The report has highlighted inefficiencies in the way that Croydon uses its IT processes and the further potential for the use of Uniform. The Council needs to be aware that the national Planning reforms are focusing on improved data standards and the further digitisation of the Planning system. The Government is committed to supporting Planning authorities in this regard and to ensure that the efficiencies in Planning can be supported by a more consistent and customer focus set of data standards. However, Croydon Council must ensure that it properly engages with these wider national Planning initiatives and time is freed up for officers to benefit from Government support. If this time is not given now a potential invest to save initiative could result in further pressures on staff who are then compelled to engage due to nationally set deadlines being introduced.

## 9. Implementation, next steps and further support

- 9.1 It is recognised that senior political and managerial leadership will want to consider and reflect on these findings.
- 9.2 To support openness and transparency, the peer team recommends that Croydon Council shares this report with officers and that it publishes it for information for wider stakeholders. There is also an expectation that an action plan would be developed by Croydon Council and published alongside the report.
- 9.3 The Peer team, PAS and the LGA are keen to build on the relationships and the peer challenge process includes a six-month check-in meeting. This will be a facilitated session which creates space for the councils' senior leadership to update peers on its progress against the action plan and discuss next steps and any further support required.
- 9.4 A range of support from the [LGA](#) and [PAS](#) is available on their websites. This includes:
- Development Management - Decision making, committees and probity
  - Making Defensible Planning Decisions
  - Developer Contributions - Community Infrastructure Levy, Section 106 agreements and Viability
  - Getting engaged in pre-application discussions
  - Design training for councillors
  - Development of local plans
- 9.5 In addition PAS would be happy to point Croydon Council to other Councils where there is best practice where areas for improvement have been identified in this report. In the same way PAS would like to use some of the best practice that Croydon demonstrates in helping other Councils through continuous improvement and learning. For more information about planning advice and support, please contact [peter.ford@local.gov.uk](mailto:peter.ford@local.gov.uk)
- 9.6 The LGA has a range of practical support available. The range of tools and support available have been shaped by what councils have told LGA that they need and would be most helpful to them. This includes support of a corporate nature such as political leadership programmes, peer challenge, LG Inform (our benchmarking service) and more tailored bespoke programmes. Kate Herbert, Principal Adviser for London, is the main contact at the LGA for discussion about your improvement needs and ongoing support. Kate can be contacted at [kate.herbert@local.gov.uk](mailto:kate.herbert@local.gov.uk)