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To : Spatial Planning Service,
6th Floor Zone B,
Bernard Weatherill House, 8 Mint Walk,
Croydon CR0 1EA

Email to: ldf@croydon.gov.uk

Date :

Dear Sir or Madam,

I am a resident of Kenley. I write to object to significant elements of the proposal for a Kenley Intensification Zone as detailed in policy DM35 of the draft Croydon Draft Plan CLP2. Because of the great complexity of the subject, the basis of this letter has been prepared by the experienced committee of Kendra, the local RA. I have studied or listened to their explanations, and have checked these as far as I am able, within the limited time that you have allowed to me. I am therefore content to register my objections in the terms set out below.

In brief, my objections to the Kenley Intensification Zone which are explained in more detail below, are because: the consultation has been inadequate; the CLP2 documentation is inaccurate and poorly presented; DM35 should not be applied to Kenley; and the proposals will fundamentally alter the character of Kenley, in contradiction to other LBC documents. It is deplorable that an official council document should be so inadequate

Thus the proposed Kenley Intensification Zone should not be implemented for the following detailed reasons: -

1 Poor consultation process and presentation of the proposals for Kenley

1.1 Poor consultation process – this is the first time the proposed Kenley Intensification Zone has been presented for public comment.

CLP1, which was adopted in April 2013, contains no references to Kenley being proposed as an intensification zone.

During a Council exhibition (meet the public session 2015) for an early draft of CLP2, there were high-level maps indicating a Kenley intensification zone. Numerous and persistent questions from many residents of Kenley to the planning officers present elicited only the reply: “more of what you have already”. Clearly we were misled at that time.

The consultation period provided by Croydon Council for CLP2 is only 6 weeks (6th Sep to 17th Oct). It is recommended practise that 12 weeks be provided for public consultation. Given the amount of documentation that forms CLP2, the poor presentation, the technical nature of the content and the fact that this plan could be in place for 20 years it is wholly unacceptable that the consultation period afforded to the public is only 6 weeks.

1.2 The documentation of the Kenley Intensification Zone in CLP2 has been rushed in its preparation and not properly integrated into the overall CLP2 plan

It is very difficult for any person unfamiliar with town planning to understand from CLP2 that there is a proposal for a Kenley Intensification Zone and what this means? The proposal for a Kenley Intensification Zone is **not** mentioned within the places summary for Kenley (CLP2-Detailed Policies p159-160). It is necessary to read and connect several parts of the document to properly understand what the Kenley Intensification Zone is, and what is proposed for Kenley. For example:-

- Page 133 states that the “Area around Kenley Station” will be subject to DM35.4.
- Page (not defined) shows the summary map for Kenley and states the “Area for focused intensification proposed between Kenley Station and Godstone Road”. A reader that is familiar with Kenley might realise at this point that the description is not aligned with the area shown on the outline map
- Page 135 has Table 11.4 that lists what might be encouraged within an intensification zone. The table appears irrelevant unless you make the intellectual leap that the terms on the left need to be treated as “definitions”.
- Page 159 shows that Kenley is being characterised as ‘Detached Houses on Relatively Large Plots’ and ‘Planned Estates of Semi-Detached Houses’. Although unstated, clearly these characteristics need to be applied to Table 11.4 on page 135. But it is unclear what the various headings “Conversion”, “Additions”, “In-fill Plot and subdivision”, “Rear garden development” and “Regeneration” mean because it is not stated. The reader needs to realise that they are defined on page 134
- Page 134 then explains the type of developments that will be accepted. It is only here that the reader can become aware that this includes front extensions, adding storeys, conversion to multiple-occupation, semi’s and blocks of flats in Kenley

The above is an ill-prepared maze and it is only on assuming solutions for the maze that it is then possible to understand and comment on the proposals.

1.3 The proposal for 3 storey new builds has not been proposed prior to CLP2

The proposal that all new builds within Croydon will be required to be of at least three storeys will be very detrimental to Kenley.

Kenley is a sylvan neighbourhood with extensive trees in the front and rear gardens of the properties. A critical feature of Kenley is that the 2 storey houses are generally well spaced out. This enables the green backcloth of the trees to be clearly visible above and between the houses. CLP2 seeks to

- Bring the front building lines forward for existing and new developments
- Build the houses higher for existing and new developments
- Building the houses wider for existing and new developments

The above can only be detrimental to the sylvan character of Kenley in general.

2 The policy to intensify Kenley as stated in DM35 has not been “justified”

2.1 The area defined by the policy is not aligned with the area on the accompanying map

CLP2 states on the summary map for Kenley “Area for focused intensification proposed between Kenley Station and Godstone Road”.

The map clearly shows that the extent of the proposed Kenley Intensification Zone is of considerably greater extent than can reasonably be understood as “between Kenley Station and Godstone Road”.

Using tools available within Google Maps it is found that the total area of the proposed Kenley Intensification Zone is approx. 166,500 m². The area between Kenley Station and Godstone Road is approx. 20,500 m² (just 12% of the area indicated on the map).

It is clear that the purpose of policy DM35 is to “intensify the area between Kenley Station and Godstone Road”. However, 88% of the proposed intensification zone lies outside of this stated area.

2.2 The boundary of the Intensification Zone has not been explained or justified by the Council
CLP2 contains no explanation or justification of the proposed boundary of the Intensification zone. Why does it extend for a considerable distance beyond “the area between Kenley Station and Godstone Road”?

2.3 The policy DM35.4 should NOT be applied to Kenley

The policy of focused intensification is described as being appropriate for areas with a PTAL of 4 or higher (CLP2-Detailed Policies, p.136). Whilst Kenley does have a train station, it is on a branch line. The Kenley train services are quite poor compared to most train stations within Croydon.

Reference to official tools show that the area around Kenley Station has a PTAL of only 2; and this is not expected to increase within the expected life of this new Croydon Local Plan (ie 15 to 20 years).

CLP2-Detailed Policies, p.133 states that focused intensification will “work”: “Due to the high availability of community and commercial services”. It is totally unrealistic to describe this part of Kenley as having “high availability of community and commercial services”. We have no library, no taxi cab company, no bank, no post office, no super markets, no hardware store, no electrical store, no shoe repair shops, no book shops, no charity shops, no dry cleaners, no coffee shop, no florist, no café etc. Our “local” police station is in Addington and is 4.6 miles away; and our “local” secondary school is a 1.6 mile drive away. (To provide a reference to understand these distances, the widest point on the proposed intensification zone is 0.4 miles)

The area within the proposed intensification zone has two very small parades of shops that are in decline. Currently these predominantly provide fast food take-aways and restaurants.

2.4 DM35 is contradictory in its application to Kenley

Kenley is described as (CLP2 Detailed Policies, page 159)

The built areas of Kenley and Old Coulsdon predominantly consist of the following residential character types: ‘Detached Houses on Relatively Large Plots’ and ‘Planned Estates of Semi-Detached Houses’. The residential character is reinforced by consistent building lines and setbacks that create large green front gardens or (in the case of flatted development) grounds and rear gardens with tree planting

Policy DM35 is described as (CLP2 Detailed Policies, Page 130)

Positive character of the Places of Croydon

DM35 then goes on to define that acceptable changes include (see section 1.2 above)

- Front extensions
- Conversion to multiple occupancy dwellings
- Rear garden development
- Conversion of detached properties to semi-detached
- Raising the roof to add storeys

The changes above will actively degrade the “Positive character” of central Kenley. Any changes to the street scene such as front-extensions and disturbance of the building line, provision of semi-detached housing and flatted developments can only have a detrimental impact on the character of Kenley. This will occur because: -

- Significantly increased built form, and the loss of trees will significantly remove/conceal the sylvan character and the green backcloth
- The increased housing density will bring with it a significant increase in the number of cars as the PTAL is only 2. More cars will need to be parked -so gardens will be converted to hard-standing, and on-street parking will increase. But there is no capacity for further on-street parking within the proposed intensification zone.

2.5 The pleasant view over Kenley from Riddlesdown Common will be compromised

The map provided by Croydon Council shows a viewpoint from the north edge of Riddlesdown Common looking down over the pleasant vista of Kenley. It is anomalous and thoughtless of the Council that the proposed Intensification Zone, with its massive increase in building size, density and loss of trees should be right in the middle of this vista.

CONCLUSIONS: From consideration of the above detailed reasoning it is abundantly clear that the logic of proposing a Kenley Intensification Zone is flawed, based on the evidence of the council's own documents. DM35, in as much as it is directed at Kenley, should be withdrawn from CLP2.

Yours faithfully,

(Signed).....

Print name