

1) Area of focussed intensification proposed in the area between Kenley station and Godstone Road (Policy DM35)

This is explained on page 130. DM35 seeks to maintain and develop the “character of places within Croydon borough”. “Kenley and Old Coulsdon” is one of the 16 places that are reviewed.

DM35 provides for 4 policies:

- **DM35.1** To ensure that the Council’s aspirations and objectives for each of Croydon’s 16 Places is clearly reflected in the built environment, proposals should complement and enhance the predominant positive character types identified in each of the 16 Places.
- **DM35.2** The Council encourages the minimum height of 3 storeys for developments across the borough, subject to high quality design, other policies’ compliance and cumulative impact on community and transport infrastructure.
- **DM35.3** In specific locations identified on the Policies Map development should also refer to and be informed by the Place-specific policy.
- **DM35.4** In specific locations identified on the Policies Map to maximise the potential for sustainable growth in the 16 Places, the Council will support the intensification of areas which are developable, where there is adequate provision of community infrastructure, good accessibility to public transport and open space and schools.

This then derives from how the “places” plan for “Kenley and Old Coulsdon” is defined. See page 159. This basically describes the general housing of Kenley and how the housing co-exists with the trees and open spaces.

So if we then review the four components of DM35 against the “places” definition of Kenley then we get this

DM35.1 supports the aspirations and objectives for Kenley as expressed in “places”

DM35.2 Says that any new build houses should be formed of a minimum of 3 storeys

DM35.3 Some place specific policies can be formed.

DM35.4 The areas where intensification is permitted.

It is DM35.2 and DM35.4 that are most relevant to the Kenley

- There will be a requirement that new build will be on 3 storeys
- Kenley will be an area for “focussed intensification” between “Kenley Station and Godstone Road.”

To understand policy 35.4, it is necessary to break it down

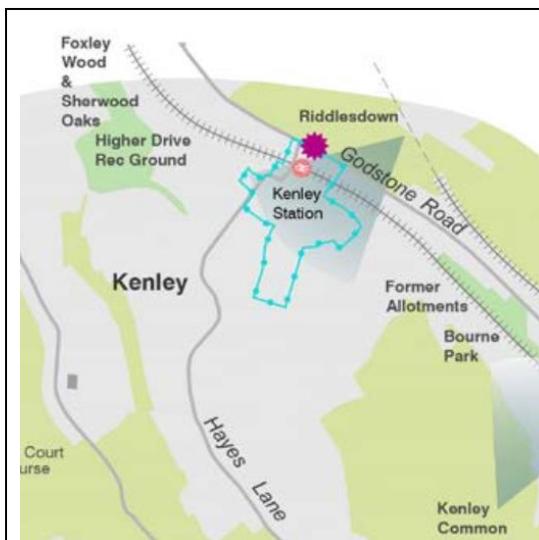
What is the actual area of the intensification zone?

There is a technical definition of the area that forms “an intensification zone”. The definition is based on the distance that an average person can walk in 10 mins. As such the zone is shaped by the road layout and may extend beyond the defined area.

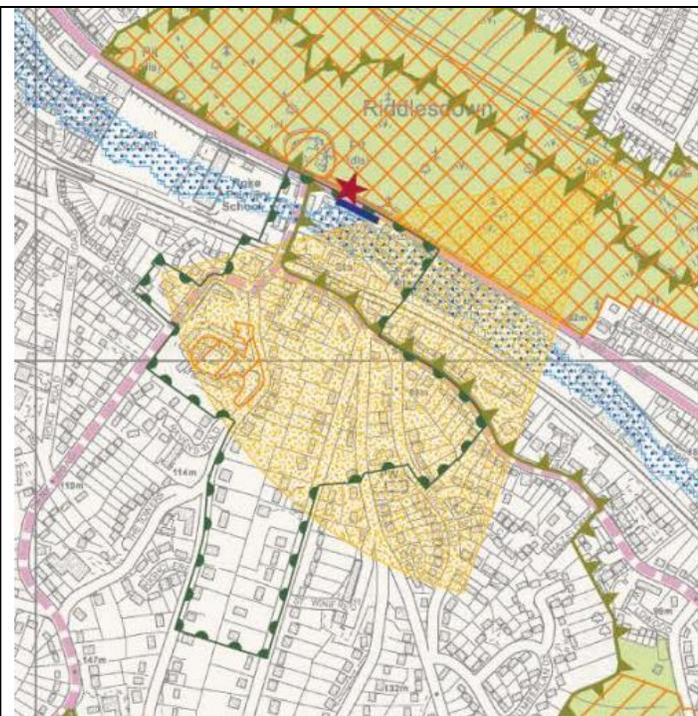
To assist with understanding exactly which roads and properties are impacted the policies maps document at <https://www.croydon.gov.uk/sites/default/files/articles/downloads/croydon-south.pdf> can then be used (see Figures 1a and 1b).

There is a significant difference between the area stated in the aims of DM35.4 and the actual area that is impacted. Consider: -

- The high level objective of DM35.4 as it relates to Kenley is clearly stated as an “Area of focussed intensification proposed in **the area between Kenley station and Godstone Road**.”
- The area of the intensification as indicated on the map shows that the zone is significantly larger and extends well beyond what would reasonably be recognized as “the area between Kenley Station and Godstone Road”. The major part of the zone is located to the south of Kenley station



Graphic 1a) the outline of the Kenley Intensification zone (blue outline)



Graphic 1b) The outline of the Kenley intensification zone as presented on the “Draft Policies Maps”

From Graphic 1b it can be seen that the intensification zone includes the following roads in addition to the area between Kenley Station and Godstone Road:

- Lower part of Park Road
- Lower part of Hayes Lane (up to the junction with Abbots Lane)
- All of Oaklands
- 1 property in Oaks Way

- Lower part of Abbots Lane (east side)
- Lower part of Welcomes Road and the west side for more of the road
- Lower part of Kenley Lane
- Lower part of Church Road
- Parts of Valley Road (south side) near the station
- All Redwood Close

Using the area tool available within Google Maps it is possible to estimate areas of the intensification zone as follows: -

- a) The area of the intensification zone that is between Kenley Station railway line and Godstone Road is approx. 20,500 m²
- b) The area of the intensification zone as indicated in the detailed polices map is approx. 166,500 m²

So it is reasonable to argue that:

- Only 12% of the proposed Intensification Zone is actually “between Kenley Station and Godstone Road.”
- Or expressed in a slightly different way - the area OUTSIDE of the area “between Kenley Station and Godstone Road” is more than 7 times the area that is “between Kenley Station and Godstone Road”.

What is an intensification zone?

“Intensification” is being used to mean “Accommodating growth and improving Croydon”.

Page 130 explains that - Policy DM35.4 applies to locations where the Council will support intensification associated with **gradual change of the area’s local character**.

Page 133 attempts to explain how the policy will work

- ... the Council will support focussed intensification associated with **gradual change of area’s local character** under Policy DM35.4
- The Council recognises the need to proactively plan for the population growth. The challenge for the Croydon Local Plan: Strategic Policies is to respect local character and distinctiveness whilst accommodating growth. Croydon’s aspiration is for this to be done in a way that **contributes to the improvement of each of Croydon’s 16 places...**

So what development will be allowed within an intensification zone?

Page 134 provides a number of evolutions (or interventions) that may be made that are deemed to be **without significant impact on the character**. These are: -

- Subdivision of large properties into multiple dwellings
- Extensions to side, front, or roof
- Subdivision of plots so that in-fill properties can be placed into the spaces
- Rear garden development
- Replacement of properties with semis and flats

Page 136 then explains that proposals for NEW developments will require a **MINIMUM building height of 3 storeys** as per DM35.2 (in areas where the buildings are predominantly 2 storeys)

Any interventions will remain subject to a granted planning application.

So what is the “character of Kenley” that must be protected under DM35.1?

Page 159 defines the predominate character of Kenley as:

‘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

The text in italic is critical as these terms also define which interventions can be utilised as part of the intensification within the zone.

For the manner in which the local character of Kenley is defined, the council proposes that ALL 5 of the interventions listed above can be applied.

Proposed KENDRA position on DM35: Totally object to the way this policy is defined and applied to Kenley. Further, the council has not followed a proper and transparent process to arrive at the policy. Specifically, KENDRA is concerned about :

1. The intensification zone policy is very poorly defined:-
 - a. The zone boundary, as defined on the map, bears little resemblance to the high level statement and objective to intensify the “area between Kenley Station and Godstone Road”
 - b. The boundary of the intensification zone is illogical and not explained or justified
 - c. The area included within the intensification zone has only approx. 12% of the area that can be reasonably described as “between Kenley Station and Godstone Road”. So the stated objective is to develop the area between Kenley Station and Godstone Road but 88% of the proposed zone is outside of the stated area. So the major impact of the policy will be OUTSIDE of the stated objective area
2. CLP2 states that the interventions that are supported as part of the Intensification zone are deemed to not have a significant impact of the character of the area. Whereas, the documented interventions will clearly have a MAJOR impact on the character of the area as these interventions include:
 - a. Front extensions
 - b. Raising roof ridges to create additional storeys
 - c. Additional dwellings as side-infills
 - d. Rear garden development
 - e. Replacement of detached houses with semi-detached housing or flatted developments
 - f. New builds mandated to provide a minimum of 3 storeys
3. The provision of front extensions, side and rear infills, new build of semi-detached houses and blocks of flats where detached buildings exist today, with buildings on “at least 3 storeys” will dramatically change the character of the area and require the description of Kenley as a “Croydon place” to be updated
Current Kenley housing is predominantly of detached houses of 2 storeys situated in spacious plots with ample trees in front and rear gardens (as stated in the “Croydon Places” document when describing Kenley.
4. The proposal for Kenley to be an intensification zone under DM35.4 is in direct contradiction of the policy defined in DM35.1.
5. Lack of due process
 - a. This is the first opportunity that Kenley residents have been afforded to properly comment on the proposed intensification zone. Given how badly this policy is

presented, it is very difficult for residents to understand and then comment on the policy