

12th October 2018

Geoff James

Kenley & District Residents' Association

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

Dear Sir,

Re: SPD2 consultation

This letter details the comments that Kenley and District Residents' Association (KENDRA) provides for the consultation on the draft document SPD2.

We have reviewed the draft version of the Supplemental Planning Document SPD2 which is currently in consultation. There are two aspects of SPD2 that significantly affect Kenley. Firstly, there is the Kenley Focussed Intensification Zone (FIZ) designated for the area around Kenley Station that is impacted by SPD2 Chapter 3. Secondly, there is the remainder of Kenley (outside of the Kenley FIZ) that is impacted by Chapter 2.

EXECUTIVE SUMMARY

This letter examines the problems with proposals in the document Supplemental Planning Document SPD2 as supported by the Croydon Local Plan document (CLP). These comments are provided as part of the SPD2 consultation.

CLP and SPD2 fail to conform to London and national planning policy guidance that relate to Kenley:

- 1) Mayor of London (MoL) requires that reasonable parking be made available where PTAL is low in places such as in Kenley
- 2) NPPF requires property developments to be stopped if road safety is compromised. The proposals seek to increase pedestrian use of the already dangerous roads. Croydon Council has made no publicised assessment of these dangers or what level of development might be permissible within advised safety limits
- 3) NPPF requires that there be "inclusivity" within local plans. The Kenley FIZ fails any consideration of inclusivity and/or equality impact. The pedestrian amenities within the FIZ are such that they exclude the young, the disabled, the old and the infirm.

The SPD2 is a poor document for several reasons:

- 1) It fails to recognise many important aspects of Kenley that are critical to defining the planning policy. These include poor access to transport, and the dangerous

road network. There are also specific problems with the shops and transport situated on the boundary of the FIZ.

- 2) It provides a method of assessing parking stress that is significantly flawed
- 3) It recognises that Kenley has a leafy character that needs to be maintained and then fails to provide guidance to maintain this leafy character
- 4) It requires that the grade II listed Station House becomes "the heart of Kenley". But it provides nothing that develops toward this aim
- 5) It recognises that public transport and retail facilities in Kenley are very poor. These are key pre-requisites for the FIZ. The council is progressing with the Kenley FIZ without improving these services and has provided no policies in SPD2 that will improve these services.

Kenley & District Residents' Association

The Kenley & District Residents' Association (KENDRA) has a membership approaching 1500 households in the Kenley area. We are a recognised Residents' Association and have active members that review and comment on planning matters that affect our area.

Kendra provided detailed comments and suggested improvements on the Draft Croydon Local Plan (CLP2) and presented at the external examination of the CLP2. However, CLP2 was later accepted by Croydon Council with only minor modification to become the Croydon Local Plan (CLP).

Background: Kenley FIZ in context

The Council data that was used to support the designation of the area around Kenley Station as a FIZ shows that the council expects the number of dwellings within the Kenley FIZ to increase from the 306 current dwellings to 1600 dwellings. Various parts of SPD2 demonstrate that the council fully recognises that this 350% increase in dwellings must be achieved without significant increase in the number of vehicles owned by the population residing within the Kenley FIZ, even though it is to become so much denser.

Kendra makes the following detailed observations and comments regarding SPD2:

1. Process for defining the FIZ policy within the Croydon Local Plan

Croydon Council introduced the FIZ designations into the Draft 1 of the CLP in very high-level terms with no supporting information. The concept of FIZ then received a little more detail in CLP2. The council then presented CLP2 for external review with little information to define what the FIZ designation really meant for Kenley.

SPD2 is the first detailed description of what Croydon Council intends by designating Kenley Station as a FIZ. This level of detail should have been made available as part of CLP2 and subject to external examination.

In developing the CLP the Council defined the prerequisite for designating a FIZ. This included good access to transport (PTAL of 3 or more) and good provision of retail and commercial services. Kenley met neither of these requirements during the CLP1 and CLP2 stages and meets neither requirement today.

The council elected to continue with the designation that Kenley be a FIZ on the assumption that transport and retail services would be improved very quickly, though without suggesting how this could happen. SPD2 provides nothing of any significance that will improve transport or retail facilities by the year 2036 – the time frame of the document.

2. Aspects pertinent to the character of Kenley that are not mentioned

The Area Appraisal for Kenley (SPD2 Section 3.4) fails to mention several material aspects of the Kenley FIZ area.

- Several key roads within the Kenley FIZ (Welcomes Road, Church Road, Kenley Lane, and Hayes Lane south of the bridge) lack pavements or other designated pedestrian paths.
- The humpback road bridge on Hayes Lane provides very narrow pavements for “the only route” connecting the main residential and retail areas within the FIZ. On the humpback bridge and the roads approaching the bridge, it is often necessary for pedestrians to pass oncoming pedestrians by walking in the road. If a pedestrian has a pushchair then all other pedestrians must enter the road to pass them – this includes other parents with pushchairs or the elderly with wheeled shopping bags.
- The Hayes Lane humpback road bridge is also very narrow, the bridge being only just wide enough to allow two cars to pass: wider commercial vehicles prevent any cars passing in the opposite direction.
- Kenley is very poorly serviced by existing retail facilities. The Norfolk Parade shops located on the Godstone Road lack the facilities necessary to support the housing density intended by CLP and SPD2. Whilst SPD2 mentions that the retail facilities should be revitalised there is no framework or budget to achieve such an aim. (With the limited parking and the access problems described above, it is highly unlikely that the private sector would wish to contribute significantly to any revitalisation.)
- The existing retail facilities are located on the northern boundary of the FIZ. As such the walking distances from the majority of properties within the FIZ are too great. The walking routes also involve walking on roads that are hostile to pedestrians as they lack pavements or provide very narrow pavements. There is only very limited parking by the shops.

- The access to the local Caterham bus service is also located on the northern boundary of the FIZ.
 - Again, this requires FIZ residents to walk on pedestrian-hostile roads to access this bus service.
 - The use of bus services also requires pedestrians to cross the A22 (Godstone Road). This part of the A22 lacks a controlled crossing making the road particularly dangerous for unaccompanied children, the disabled or the infirm.
- The road system within the FIZ features several blind bends, very sharp bends and narrow pinch points that prevent two cars from passing safely. This includes the bottom part of Hayes Lane and the area in front of Kenley Station. These road features cause problems for car drivers, but these factors are particularly dangerous for cyclists and pedestrians that are forced to share the roads with the motor vehicles.

These matters are material to the delivery of higher density housing and lower car ownership required by the SPD2 for the area.

3. SPD2 makes exaggerated claims regarding access to public transport within Kenley

SPD2 Section 3.4.4 states that Kenley “is well accessed by public transport”. However, the area around Kenley Station has a PTAL of just 2. TfL dictates that a location has poor public transport when the PTAL is less than 3. Also, the PTAL falls to 1b just a short distance outside of the FIZ

Whilst there is a train service and two bus routes, the services and locations that are accessible at these public transport access points are infrequent and few – hence the low PTAL.

The numbers of destinations reached by the train services available at Kenley Station have recently been significantly reduced. As such it is likely that a new calculation of the PTAL values for the area around Kenley Station would show marked reductions. Whilst the Council may argue that this is temporary, the fact remains that this situation is outside Council control and is likely to remain in place for several years. Moreover, any timetable improvements are likely to depend upon the completion of major railway infrastructure projects (such as expanding the number of platforms at East Croydon Station) that may not happen within the timeframe of the local plan.

4. Expected reduced car ownership levels are unrealistic

The FIZ strategy of increasing density while significantly reducing levels of car ownership by reduced provision for parking runs counter to the Mayor of London’s paper “Minor Alterations to the London Plan – Parking Standards” dated May 2015, and not

subsequently revised. This paper calls for “more flexibility in areas of outer London with a PTAL level 2 with particular car dependency”. Kenley neatly fits the Mayor of London’s criteria for continued recognition that ready access to private cars is a necessity for those in outer London low PTAL areas. SPD2 does not explain why it ignores the MoL paper.

Whilst SPD2 mentions the need for public transport reviews, there is no indication that there is money available to improve public transport services or that these processes will provide sufficient benefit to Kenley to increase the PTAL rating for the FIZ area even by one level to 3. A crucial aspect is the peak hour services towards London: the trains at Kenley are already full during this period, and can be expect to be severely overcrowded from the intended building in the Tandridge/Caterham area, and there is no surplus capacity in the network for any increased number of trains; the buses are likewise full, and are always caught by the traffic jams on the Godstone Road.

Even with some improvement to the public transport a PTAL of 3 is still not particularly high. An area with PTAL of 3 can expect that significant levels of car ownership will be required to give residents the required quality of life – particularly if those residents have children.

5. Pedestrian and road safety have not been properly considered in CLP or SPD2

As mentioned above many key roads within the Kenley FIZ have no pavement or only have very narrow pavements. The roads feature pinch points, sharp bends, a humpback bridge and blind corners that are particularly dangerous for pedestrians and cyclists.

The proposals for the Kenley FIZ contained in the CLP and SPD2 are directly contrary to Chapter 9 of National Planning Policy Framework (NPPF) Paras 102-111. The NPPF requires that when local planning authorities consider development proposals they should promote sustainable transport modes alongside “safe and suitable access for all users”. The NPPF advises prevention of developments if there is an unacceptable impact on highway safety or the cumulative impacts on the road network are likely to be severe. In this context NPPF advises that priority should be given to pedestrian and cycle movements. SPD2 does not explain why the legal requirements of the NPPF have been ignored.

Whilst CLP and SPD2 provide some actions to encourage sustainable transport modes (eg car charging points and parking stress assessments), it is noted that Croydon Council provides no policy or framework to:

- 1) Recognise that many key parts of the existing Kenley road network are already very dangerous for pedestrians and cyclists.
- 2) Regularly review road safety within Kenley to establish what level of development can be provided whilst remaining within stated safety parameters.

Given the existing road dangers to pedestrians and cyclists there should be no major re-developments of the FIZ area until pedestrian and cycle safety is improved and there is provision for easier/safer access to the retail facilities and transport.

A simple test of the road safety for pedestrians within the Kenley FIZ is to review the “inclusivity” and “equality” of the existing road network and how this is likely to change as a result of CLP and SPD2.

- An assessment of the existing pedestrian routes between the various residential properties within the FIZ to the transport and retail facilities would conclude that the existing pedestrian routes severely lack inclusivity as they are very hostile to the young, disabled, nervous or infirm individuals.
- The SPD2 proposals serve to make the various routes to transport and retail facilities more hostile to the young, disabled, nervous or infirm for two clear reasons:
 - i) There will be many many more people (many not owner cars) that are vying to use the limited pedestrian space to access key services
 - ii) There will be many more car movements and cars parked as more cars compete for the already limited road space

The FIZ strategy involves discouraging car ownership such that residents use other means of transport such as walking, cycling and public transport.

The existing road system within the FIZ is already very hostile to pedestrians and cyclists and there is nothing within SPD2 that suggests that this will be improved within the period of the plan (to year 2036).

Considerations regarding disabled access and Kenley train station

The pavement width on the humpback bridge is such that when a pedestrian needs to pass another pedestrian on the humpback bridge then it is usual for one of the pedestrians to walk in the road.

The humpbacked bridge is adjacent to Kenley train station. It is noted that Network Rail advertise that Kenley Station has step-free access (see web address www.nationalrail.co.uk/stations/KLY/details.html). This step-free access is achieved by directing those unable to use the stepped footbridge to use the pavement that forms part of the humpbacked bridge. Network Rail clearly expect the disabled and infirm to use the narrow pavement of the humpback bridge.

This part of Hayes Lane is very dangerous for any pedestrians who need to walk in the road. The road is narrow, and visibility is impaired due to the hump of the bridge. Oncoming cars and vans often need to pass each other on the bridge. For the vehicles to pass each other they each need to drive in the gutter to create sufficient passing space.

Clearly any pedestrians that are forced to step into the road to pass another pedestrian will need to occupy the same road space.

As the numbers of Kenley FIZ dwellings increase and the level of car ownership reduces, the numbers of disabled and infirm people using the pavement of the humpbacked bridge will clearly increase significantly. The risk therefore materialises that two people that are each disabled or infirm need to pass each other on the humpbacked

bridge. One of them will clearly need to enter the road and each is likely to be challenged by the step-kerb and would be unable to quickly return to the pavement having passed the other person. This scenario would also apply to those with pushchairs or those accompanying young children. It is clearly unsafe to force any of these pedestrian groups into a dangerous road, but this has not been recognised by the SPD2.

6. Lambeth Method for street parking stress assessment

Kendra welcomes the invitation for developers to provide Parking Stress Assessments for development schemes. The Lambeth Method appears to be well designed and suitable for many scenarios. However, there are issues with the way the Lambeth Method is defined that result in an understatement of the parking stresses in some situations:

a) **No recognition of schools**

The Lambeth Method provides no adaptations or accommodation for the parking impact of schools. Schools create two types of parking problem that combine to create significant parking stress:-

- i) School staff often park their cars on the local streets as the on-site car parking is woefully insufficient. The Lambeth Method has adjustments for “businesses” that may be used to accommodate school-staff parking, but this is not stated. In any case, there are no significant businesses near to most Kenley schools.
- ii) The parents and carers that drive their children to school create parking chaos during times of children drop-off and pick-up. Whilst our local schools are now taking measures to discourage parents from using cars for the school-run these measures have had limited effect and no major change has been achieved. Several of the Kenley schools are distant from public transport access points or the nearby public transport access points are of very limited benefit. Many parents have no choice except to drive their children to the local Kenley schools and this creates significant parking stress,

b) **Railway stations are not properly accommodated**

The Lambeth Method has an adjustment to accommodate railway stations. This is particularly relevant to Kenley as our Railway station is within the FIZ. There are two issues with the Lambeth Method modification for railway stations:

- i) A significant part of the parking stress around railway stations is caused by many car drivers stopping for very short intervals to pick-up or drop-off those who use the train services. The Lambeth Method does not capture the impact of many drivers that stop in very dangerous and/or inconsiderate places because all available nearby parking bays are fully occupied.

- ii) Many commuters are motivated to use “free” on-street parking and will walk more than 400m from their car to the railway station. For example, on a daily basis, commuters park their cars near the bottom of Abbots Lane and walk the 480m to Kenley station. When the Lambeth Method is applied to residential areas the assessment area is just 200m and the survey is completed at night. This standard application of the Lambeth Method would not capture the parking demand created by commuters that park and then get the train.

7. Failure to supply large family homes

Recent Kenley planning applications indicate that the developers are already following the flawed advice within CLP and SPD2. There are several local planning applications that seek to demolish a detached family home that provides 4 or more bedrooms and to replace it with a block of flats.

SPD2 requires the new, flatted, building to provide at least one 3-bed dwelling as a replacement for the lost family home. However, a small 3-bedroom flat (without a garage) is not often a reasonable replacement for a spacious family home providing 4 or 5 bedrooms on a large plot.

Our specific concerns are:

- a) In the near future, families with 3 or more children will struggle to find any homes suitable for their needs as all the 4- and 5-bed dwellings are lost from the housing market.
- b) There are many people that “work from home” or need to carry out significant levels of business administration from home (possibly due to child care needs). These people often require a home-office. The flatted designs that result from SPD2 do not provide a home-office. Hence any home-worker requiring an office will need to utilise a bedroom as an office. For these people the flats that will be common within Kenley will be too small for their families and they will need to seek a home elsewhere.

8. Over-supply of starter homes with a lack of amenities

The flatted designs that are being proposed as a result of CLP and SPD2 within Kenley have the following characteristics:

- Blocks of flats that supply one 3-bed flat (as described in Section 7) and the remainder are 1- or 2- bedroom dwellings
- The 2-bed flats may be for 3 persons or, rarely, for 4 persons.
- The total number of flats is typically 9 – the developers are optimising to this level to avoid requirements for 3-bed dwellings and social housing that must be met for blocks of 10 or more flats)
- Most schemes propose flats are only just compliant with the legal minimum floor area requirements.

- A very low ratio of available parking spaces to dwellings

This flatted design will mostly attract those wanting starter homes. That is, single professionals, or newly married couples - potentially with very young children. But this demographic will not find the area attractive because Kenley lacks many amenities expected by this group.

This new starter home group is characterised as demanding:-

- 1) Easy access to good quality transport – this may be public transport with easy access, or their own car that is parked very close by
- 2) Safe pavements that allow access to children's amenity spaces and retail services that are within a short walking distance.
- 3) Cafes, clubs, meeting areas, a variety of restaurants – several of which need to be child friendly.

There is nothing presented in CLP or SPD2 that provides the amenities that will make Kenley attractive to the target demographic for the housing that the developers are providing.

The developers need encouragement to cater for an alternative demographic, or ideally a variety of demographics. Alternatively, the Council needs to ensure that the facilities and amenities that young professionals and young families need are made accessible.

9. Housing provision is misaligned to school provision and road safety

Connecting several of the above sections, the flaws in the SPD2 document become apparent.

SPD2 de-emphasises car ownership to the point where it will be impossible for most occupiers of the FIZ to own a car. The on-site parking will not be provided, and the on-street parking within an extended walkable distance around the station will inevitably be severely restricted.

The situation of the young families must then be considered and the flaws in the SPD2 become clear.

- 1) The parents will typically be without access to a private car. These parents will need to access the nurseries and primary schools by walking on roads that are already very hostile to pedestrians. It is hard to imagine the parents will accept the risks to their children if they access the nurseries and primary schools on foot. (We are already aware of parents of children at the Hayes School who live on Hayes Lane and choose to drive their children to school because getting to the school on foot mandates the unacceptable risks of walking along a narrow road with no pavements that is a short-cut for impatient drivers.
- 2) The young children will get older and will need to attend a senior school at around 11½ years. Kenley does not have a senior school. Any access to the

nearest senior school requires the children to walk on roads that are hostile to pedestrians to access very poor public transport or to walk across the common to Riddlesdown School.

- a. Will parents let their children or 11, 12 and 13 years old walk unsupervised on the Kenley roads without pavements? (Our observations are that parents of the secondary school age children today do not let their 11, 12 and 13-year-old children walk these hostile roads)
- b. The pavements such as those near the hump back bridge are very narrow and will reach capacity very quickly if this becomes a major children's walk route to secondary schools. The pavements will become more hostile to unsupervised children.
- c. Access to Riddlesdown School and/or the local bus service requires people to cross the busy A22. There is no controlled crossing at Kenley. Will these parents accept that their children cross this busy road unsupervised?

It is considered that the majority of parents will demand easy access to a private car. If they can't have a car then they will need to move out of Kenley to somewhere that has safer pavements and good public transport, or where they can own a car.

10. Failure to define character

The SPD2 policy mentions the need to maintain the character of an area, but this is not defined, and the examples encourage a very flexible interpretation. The text needs to more rigidly define what "character" of Kenley is to be preserved.

SPD2 Section 3.3.1 mentions the "leafy character" of Kenley. However, there is nothing in CLP or SPD2 that seeks to preserve this leafy character.

It is noted with great concern that none of the examples of "quality design" featured in SPD2 Section 2.8 provide a "leafy" design. They all present overly dominant built forms to the detriment of trees, shrubs and lawn which were part of the previous frontage. Naturally this seriously detracts from the street-scene. This is discussed further in Section 12 below.

11. Quality of design

Croydon Council wants to encourage "quality design". As stated in SPD2 Section 2.8 the council deems quality design to include three broad options as follows:

- **Sympathetic and faithful** - where schemes closely resemble surrounding properties.

- **Innovative and original** - where schemes respond to context through contemporary use of form and materials.
- **Contemporary reinterpretation** – where schemes are contemporary but retain some traditional character forms.

Each of the three quality design options are clearly logical and justifiable in their own right. However, when these three options are considered collectively, it is difficult to imagine any design that will be refused (except where the fenestration or stepping fails to comply with other examples contained in SPD2).

It is clear that a developer can design almost any built-form and then provide a flowery narrative that explains how their design is fully aligned with one or more of the “quality design” options preferred by the council.

12. The overall strategy for the Kenley FIZ is severely flawed

SPD2 Section 3.3.1 states that the planning authority’s strategy for the Kenley FIZ is:-

- 1) To maintain the leafy character of Kenley.
- 2) To regenerate the village centre with the grade II listed railway station as its heart.

The current CLP and draft SPD2 will clearly fail to meet these aims:

Leafy character of Kenley - There is nothing contained in SPD2 or CLP that supports or encourages the maintenance/development of the leafy character of Kenley. The CLP and SPD2 Section 3.6 positively encourage wider, deeper and taller built forms that are prominent to the street and require the removal of existing soft landscaping. These documents are clearly to the detriment of any “leafy character”.

The examples of quality design in SPD2 Section 2.8 and others throughout SPD2 provide for the removal of significant greenery from any plot, particularly from the street-visible front of the plot, with the emphasis on the provision of the built form and hard landscaping.

Village centre with the grade II listed railway station as its heart - This is the first time that Kendra and the residents of Kenley have been made aware of the objective to make the old station house “the heart of Kenley”. This proposal has not been thought through and cannot succeed for these reasons:

- The grade II listed railway station house is privately owned and used for commercial purposes. The building has no community value except as a visual feature for station photographs.
- There is no indication that the council intends purchasing or repurposing the old station house so that it does provide meaning to the local community. And there is no indication that additional community facilities will be made available near to the old station house.

- SPD2 Section 3.5 Figure 3.5c suggests that the council would permit the station carpark to be redeveloped as a very large 3 and 4 storey building. This building will dominate the grade II listed station house and it unlikely to be permitted due to the encroachment on the ambience of the grade II listed building.

Whilst it is accepted that Kenley would benefit from a community centre, the council has not identified a suitable centre and CLP/SPD2 contain no provisions to develop the heart of the community.

It is clear that there is a significant misalignment between the stated high-level strategy, and the semi-detailed policies as documented in CLP and SPD2.

13. Old Police Station Car Park should be reserved for community benefit

There is a large potential car parking area at the rear of the Old Police Station that is unutilised today. There have been several planning applications that seek to build a supermarket or a hospital over this carpark. These applications fail generally due to the flood risks of this site.

SPD2 is an opportunity to define this area as a car parking area for the Kenley community. Potentially this space could provide car parking for rail users (with a footway access via Purcell Close) and for those that want to access the local shops and the well-used Kenley Memorial Hall.

SPD2 Section 3.3 mentions the need to revitalise the businesses along the Godstone Road. The provision of additional parking would be an important component of any plan to deliver that revitalisation

14. Ancillary wall items

SPD2 Section 2.27 deals with ancillary items on wall surfaces that are exposed to the public realm. Kendra appreciates a policy that seeks to improve the way building drainpipes, plumbing and vents present to the public. Kendra makes these observations:

- i) There is no requirement in SPD2 to provide the design for ancillary items on the wall surfaces of houses or blocks of flats early on in the design process.
- ii) The policy needs to specifically include the wiring for external lighting, broadband and satellite services. When not installed during the build phase, these services are often retrofitted by running unsightly wires along the wall surfaces.

Yours faithfully,

Geoff James BSc(Hons), MBA, AMBA