## **Kenley & District Residents' Association**

www.kenleyra.org.uk

18th February 2018

Geoff James Kenley & District Residents' Association

To: Sadiq Khan (Mayor of London) New London Plan GLA City Hall London Plan Team Post Point 18 FREEPOST RTJC-XBZZ-GJKZ London SE1 2AA

Dear Mr Khan.

Re: The proposed changes to the London Plan

Kenley is a small residential area located within the London Borough of Croydon, and on its southern boundary with Tandridge Council. Tandridge itself is within the county of Surrey.

**The Kenley & District Residents' Association** (KENDRA) has a membership approaching 1500 households in the Kenley area.

KENDRA objects to significant elements of the proposed changes to the London Plan and how these will impact the Borough of Croydon and therefore our local area.

## 1 The London Plan is taking too high a proportion of the housing supply needed for southeast England

The London Plan proposes that the London boroughs take on too high a proportion of the new housing supply required for southeast England. Surrey and other counties in the southeast should be required to take a higher share of the needed new housing supply.

# 2 Croydon lacks the capacity to meet the raised housing supply targets

Croydon Council has just approved a 20-year housing supply plan. The changes to the London Plan will require Croydon Council to meet the recently agreed 20-year housing supply plan in just 10 years.

The new housing targets, as specified in the London Plan for Croydon, are excessive, and the Croydon area does not have the capacity to meet these targets without urbanising large areas such as Kenley; note that Kenley itself lacks the infrastructure to support such urbanisation, and that no coherent plans have been presented to address this lack.



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#### 3 Kenley needs to be treated as a buffer zone

Kenley is located at the outer edge of the London conurbation and includes a large area of Greenbelt land. This extreme southern part of Croydon needs to be a buffer zone between the urbanised areas such as Purley, and the open green belt. Otherwise, the London Plan and Croydon Plan will progress toward creating city centre type housing right up to the boundary with the green belt: this would inevitably have a deleterious effect on the flora and fauna in the Belt.

### Kenley is a gateway to the green belt

Following on from the above. Kenley station is an ideal access point for those travelling from the city area to the green belt. If Kenley is comprehensively urbanised, as currently intended by the London Plan, then people arriving at Kenley will be confronted by more city centre type buildings and a dangerous walk to access the green belt.

Kenley should present a nice quiet residential gateway that is welcoming and safe for city dwellers that wish to access the greenbelt.

#### Back gardens should be protected

The changes propose to remove protection to back-gardens - this change is not aligned with the National Planning Policy Framework (NPPF). There is no reason to remove the back-garden protection that is provided in the NPPF.

#### Character should be protected

The character of an area is partly defined by the trees and the view of their green backcloth between and above the housing. Changes that seek to increase the density of housing will clearly result in housing that is built closer to the road, closer together and with higher roof ridges. This will present significant size and massing to the viewer and will conceal the green backcloth and will therefore be detrimental to the character of the area.

## 7 Permitted parking spaces for new developments are already too few and should not be reduced further

Large parts of Kenley have a PTAL of 0. The highest PTAL is located around our train station and is only 2 as the train and bus services are so poor.

The council, in forming the latest Croydon Plan, has been unable to identify viable ways to significantly increase the PTAL of our area, even over the 20-year duration of their plan.

Kenley is formed in a valley and residential area extends up the valley sides. The hills are too steep for most people to consider cycling or to contemplate walking whilst carrying groceries etc. Many of our access roads lack pavements or have narrow pavements and discourages parents to use their roads to walk with young children, or to allow their polder children to walk alone on the roads. Consequently, access to a car is almost mandatory for anyone that is not house-bound in our area

The existing on-site parking standards provided in the London Plan are already set too Caring about Kenley low for houses of at least 2 bedrooms.

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Lowering the on-site parking standards further will result in a much greater demand for on-street parking for Kenley housing that is located both near and distant from the train station. In many cases there simply is no capacity for further on-street parking as the road network is narrow, lacks pavements, or the limited available on-street parking is already fully utilised. The result of further housing that demands on-street parking will be to cause unsafe parking on our already very dangerous streets

If I can be of any further assistance, please do not hesitate to contact me.

Yours sincerely,

#### **Geoff James**

Planning Officer

Kenley & District Residents' Association

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Cc: Steve O'Connell – Councillor

Steve Hollands – Councillor Jan Buttinger – Councillor

