

Canning & Clyde Road Residents Association

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By Special Delivery

The Planning Inspectorate
Attention Deborah Tobin
4/04 Kite Wing
Temple Quay House
2 The Square
Temple Quay
BRISTOL BS1 6PN

17 July 2007

Dear Ms Tobin

**Town & Country Planning Act 1990 – Section 77 Application by Arrowcroft Ltd
Site and Land Adjoining East Croydon Station, George Street, Dingwall Road and
Lansdowne Road, Croydon
Town and Country Planning (Environmental Impact Assessment) (England and
Wales) Regulations 1999 (SI 1999/293)**

We have been informed by Berwin Leighton Poisner that we have an opportunity to comment upon the latest planning material for this important East Croydon Gateway site. We are sending this objection on behalf of Park Hill Residents Association, Morland Park Residents Association, H.O.M.E. Residents Association and our own Association. This represents over 4,000 households in the vicinity of the proposed development. We are aware of strong opposition to the applicant's scheme by other residents who do not have the representation of an association.

Our own Association has commented on the original application to the London Borough of Croydon on 7 February 2003 and to the Government Office for London on 10 February 2004. We trust, as we intend to speak at the forthcoming Inquiry, that these previous objections will be considered by the Inspector.

As you are aware, the potential developer has just released a considerable amount of last minute new information and we would like to further object by adding the following:

1. We believe the current plans are amongst others contrary to the Secretary of State's Policy in PPG13 and Policies PPS1, PPS3 and PPS6.
2. The plan completely fails to show any improvement to the public transport infrastructure, only a woolly reference to a new platform at East Croydon Station.

3. The statement of impacts on transport generation and modal travel patterns is severely flawed. For example, the traffic assessment is based on two days, Wednesday 18 July 2006 and Saturday 6 January 2007. There is no evidence that either of these days is representative. It would be expected that traffic would be relatively light on a Wednesday in mid-July because it is in the holiday season and some educational establishments were on holiday.
4. In an endeavour to prove transport capacity, the importance of chronology seems to have been forgotten. It is highly likely that patrons will arrive in a pulse during the hour before an event. This coincides with rush hour for both vehicle and public transport, particularly trains. Most certainly a 17.00 hours to 19.00 hours assessment, possibly of a Friday, is needed for all modes of transport. The patrons' choice of transport will of course be decided by ease, cost and sociability. Particularly with a mind to returning after an entertainment event, the car seems a preferable choice. There is no price sensitivity analysis to disprove this and encourage more sustainable transport choices.
5. The road infrastructure in and around central Croydon is poor and very fragile. As an example, in a three week period earlier this year, there were three instances when traffic gridlocked due to minor incidences. The gridlocking of course affected bus and tram services.
6. The difficulty in using the Whitgift, Alders or any other car parks on the other side of Wellesley Road is that patrons will have to cross the Wellesley Road either at a busy road junction or through a subway which not everyone views as safe. Arena patrons will likely be competing with patrons of the Fairfield Halls to use their car parks. The temptation to use on street parking in adjacent and neighbouring residential areas is therefore overwhelming. All of our residents associations do not wish to see any changes to existing controlled parking zones. This will damage our community and inhibit activities including attendance at clubs and places of worship. Where will patrons of the 12,000 square feet night club park up?
7. We note that the supermarket has grown to over 110,000 square feet. The original plan was that people would use this supermarket to do their weekly shop. Given that the total site contains more cycle parking places than car parking (1,477 / 1,186) and given the difficulty of driving into the centre of Croydon, it seems unlikely that people would want to use it for a weekly shop. What will be the purpose of this supermarket that is not already provided for in the centre of Croydon? Cycling in central Croydon is known to be extremely hazardous.
8. The Means of Transport Statement is severely out-of-date. The tram routes have changed and bus service listings are out-of-date at time of traffic assessment. The volume and distribution of public transport travel in Greater London has increased substantially since 2000 so for example updating a seven year old SRA rail travel survey is not likely to give valid results.

9. Although the applicant presents Croydon as having quick public transport links from all areas, this is not the case for certain places within the potential catchment area, such as Orpington, Bromley, Biggin Hill, Selsdon and Sanderstead amongst others. These people will likely come by car.
10. We think the nature of the development is such that it should be required to demonstrate that a sequential approach has been applied in selecting the location for the proposed development. This is dismissed by saying that none were considered. Why? The most cursory of investigations would have revealed the potential of the nearby Crystal Palace Arena. It has a seated capacity of 16,500 and can handle up to 45,000 for large concert events. It has Crystal Palace Station adjacent to the main entrance and has three other railway stations within easy walking distance. The Arena is well served by a variety of bus services from throughout London – the East Croydon Gateway site being just a 25 minute public transport ride away. The Crystal Palace area is highlighted for regeneration. Plans proposed by Croydon Council and TfL include a Croydon Tramlink extension to Crystal Palace.
11. The application should demonstrate regeneration which we take to mean creating a sustainable community. We believe that the Arena scheme in this location will severely harm existing demonstrable, local, sustainable and diverse communities and not create one in its own right.
12. The application contains a new building for the Warehouse Theatre, but conditional upon the Theatre being able to provide a viable business plan for the future. Since the applicant's development plans would mean displacement of the Theatre for at least a 3-4 year period then this could prove tricky (and seems fatuous, since the applicant lacks one of their own). We think this 'last minute' concession to the Theatre is due to the overwhelming public outrage – local, national and international - at its previous exclusion from the earlier planning application.
13. Nothing in the new material leads us to believe that the proposed development is commercially and financially capable of delivering the metropolitan status, rebranding and regeneration of Croydon. Since the Arena idea was first mooted, alternative arena venues have opened in London, for example Wembley (12,200 fully seated) that with the 70% increase in tube capacity can easily cope with the patronage. In addition of course we have the O2 and Indigo venues at The Dome.
14. We have yet to see a business plan for the operation of the proposed Arena. A year ago we were told by the applicant that a full capacity (12,500) audience was needed 100 times per year for the Arena to be commercially viable. We note from the latest application material that a capacity crowd has now been redefined to mean either 60% or 70% of the total possible. Apart from having to do so to suit the Transport Plan, surely this raises doubts over the commerciality of the project and raises questions as to why the Arena should be so large in the first place.
15. Is there any reason why Croydon needs yet another night club? Problems with existing clubs have recently led to the Council reviewing its licensing procedure.

16. We could find no mention in the new material of off-site law, order and crowd control nor emergency evacuation arrangements. Who will undertake this? We have been made very aware of how overstretched the Croydon Police force already is at peak times.
17. Regarding the quality of design, it appears to be more oppressive greyness and glass with which Croydon has been architecturally overburdened since the 1960s.
18. Although this applicant's scheme is preferred and promoted by the London Borough of Croydon, at no time has the Council undertaken any proper public consultation to ask the people of Croydon whether this is what they want. In fact we learnt about the original planning application by chance and were sent details of this latest application apparently because we have formally objected to the Council's Compulsory Purchase Order to the site. Notification did not come from the London Borough of Croydon but a third party. For a development of this size and with the impact that it is likely to have on Croydon for many years to come, it begs the question why the public's opinion has not been carefully canvassed and why the Council so willingly granted the original planning application (now the subject of the call-in) apparently without any viability or impact assessment.

We take heart from the UDP Inspector's Report that said an Arena on this site was not essential.

We are grateful to the applicant, Arrowcroft, for inviting us to meet to discuss our concerns about their latest development plans. We did this on 12 July 2007 but regret we received no satisfactory answers to the above and other matters raised.

Yours sincerely

Steve Collins
Chairman, Canning & Clyde Road Residents Association

Also on behalf of Park Hill Residents Association, Morland Park Residents Association,
H.O.M.E Residents Association and the former Croydon Society Transport Group