

Canning & Clyde Road Residents Association

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Attention: Deborah Tobin
The Planning Inspectorate
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13 February 2008

Dear Ms Tobin

APP / L52040 / V / 06 / 1198485

**Application by Arrowcroft Limited in respect of a proposed development at land adjoining
East Croydon Station**

Notice of Submission of Further Information to an Environmental Statement

We have been informed by Berwin Leighton Paisner that we have an opportunity to comment upon the Further Information to an Environmental Statement for the important East Croydon Gateway site. As before, 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 comments in this letter do not repeat anything we said in our letter of 11 August 2007 with reference to the Planning Application nor anything in the Canning & Clyde Road Residents Association letter of 18 August with reference to the Compulsory Purchase Order. We would ask that the comments in all three letters and supporting documentation be taken into account by the Inspector and Secretary of State.

Our comments are restricted to the Transport Assessment and Crowd Management Strategy sections of the revised statement.

1. Transport Assessment

- 1.1 The revised Transport Assessment states that the mass transport system has enough spare capacity to accommodate the peak hour of patrons arriving at East Croydon for an event at the Arena on a Monday to Friday. It only shows that there is spare capacity on trams from Wellesley and Lebanon Gardens or on trains from South Croydon, Selhurst and Norwood Junction. This is not adequate. The Transport Assessment needs to demonstrate that the transport system has spare capacity for the whole of the journey that is required to be made. In the evening peak hour there is no or very little spare capacity on trains leaving Clapham Junction for East Croydon or on trams from Wimbledon. This means that the usable spare capacity available for Arena patrons on trains from

Clapham Junction and trams from Wimbledon has been substantially overstated and indicates a need to increase train and tram services. It is our understanding that there is no spare track capacity to increase train services or trams available to increase tram services.

- 1.2 Patrons arriving for evening events at the Arena by car will be travelling into Croydon at a time when the main travel demand is out of Croydon. Most roads, except those such as the Mitcham Road, where peak travel demand is similar in both directions, will have some spare capacity but traffic congestion will be increased at junctions such as Purley Cross, Lombard Roundabout and Fiveways. Congestion at junctions has only been considered in the immediate vicinity of East Croydon but the impact of the Arena may be more serious on certain junctions further afield. This issue needs to be considered.
- 1.3 There is no comparison for door-to-door journey time between car and mass transport (if available) for homeward journeys after 2300 hours and no evidence that there is adequate spare capacity on **all** southbound trains after 2300 hours on a Friday night to demonstrate that mass transport is a reasonable alternative to the car.

Arena patrons are likely to want to get home without having to hang around too long and therefore leave en masse. There are likely to be severe capacity problems in and around East Croydon Station as people leave.

The simultaneous egress of large numbers of cars from any car park will be a slow, noisy and polluting process. It may well deter motorists from using the car parks again on their next visit to the Arena and will encourage them to park in surrounding roads instead.

After customers to public transport have queued and been subjected to stewards with loudhailers it may well make the use of cars seem more appealing for a subsequent visit.

- 1.4 The distribution of arrivals by time and the modal split for patrons arriving for events at the Arena are all based on those found at the inner suburban O2 Arena. There is no evidence provided to show that these distributions are valid for Croydon. The overstatement of capacity available for Arena patrons arriving by tram and train indicated in para 1.1 above indicates that the proportion arriving by car is likely to be understated.

Should evening events at the Arena cause mass transport to overload or the road network to gridlock, the prosperity of the town centre will be jeopardised together with the attractiveness of the town as a residential location.

The developer assumes that parking restrictions will be enforced (against fierce local opposition) on surrounding roads and that patrons arriving by car will park in designated car parks as this will prove cheaper. The car parks mentioned are all privately owned and the Council has no control over the pricing. The Council only controls four very small car parks in Central Croydon.

The Fairfield car park is as close as the Allders and Whitgift car parks, with better pedestrian links (i.e. avoiding subways) and more readily accessible by vehicles from the A232. There is nothing more quickly guaranteed to kill Fairfield than to deprive the car borne audience space in the underground car park which is both (relatively) safe and convenient; why should the existing audience be shunted off to somewhere else? The reverse policy should apply (i.e. very high parking charges *unless* one is a Fairfield/Ashcroft patron).

- 1.5 The responsibility for procuring an adequate train service lies with the Department of Transport. The Southern Railway does not have grounds to object as their franchise expires in 2009 which is before the Arena can open (para 18.7.27).
- 1.6 As the tram stops are outside the station, patrons leaving Arena events may well choose to access them along Dingwall Road. There would need to be crowd management on Dingwall Road, as non-Arena bus passengers for routes which stop in Dingwall Road would then prefer to use Dingwall Road stops rather than East Croydon Interchange stops to reduce the risk of being left behind.

2. Crowd Management Strategy

- 2.1 The Crowd Management Strategy only defines responsibilities. It does not give any indication of the controls needed to facilitate the free movement of buses and trams along Dingwall Road and over East Croydon bridge when patrons leave an event at the Arena.
- 2.2 The author of the Croydon Management Strategy does not appear to be familiar with East Croydon Station and its surroundings. All three island platforms can be, and are, served by both northbound and southbound trains so segregation of patrons into northbound and southbound is not practical.
- 2.3 The tram stops are outside the station which means that people wishing to reach them would use Dingwall Road.
- 2.4 There are normally queues for buses and taxis at East Croydon Station in the late evening even when bus and train services are running well. Further crowding is liable to occur when services are disrupted.
- 2.5 In 6.1.1 a pedestrian travel time of approximately 3.5 minutes indicates too short a time for any significant crowd dispersal of thousands of pedestrians. Only a much longer walk than this would work.
- 2.6 There is no mention of how the co-ordination is to take place of the control of customers into the Station using the exit ramp from the Plaza with those using the main entrance into East Croydon Station.
- 2.7 There is no mention of crowd control for those congregating to await coaches at the end of an event.
- 2.8 The developer does not consider pedestrian noise (with or without 'binge drinking') outside the immediate site. No account is taken of people returning to their cars in residential streets late at night.
- 2.9 Showsec state that the Police will be responsible for the crowd outside the Arena site. Has anyone asked the Police if they have sufficient resources to do this? Who will meet the cost?

Finally we note that many of the developer's submissions of material for the Planning Inquiry have been late and have had to be revised when challenged.

Yours sincerely

Anne Bridge
Secretary, 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 Croydon Transport Focus Group