



THE EAST COULSDON RESIDENTS' ASSOCIATION

Chair : Charles King MBE
50 Reddown Road
Coulsdon CR51AX
01737 554841

Secretary : Maureen Levy
22 Faidene Road
Coulsdon CR5 1RA.
01737 555231

Cane Hill Development Planning Application 13/02527/P
Development Management
Croydon Spatial Planning department south
6th Floor Zone B
Bernard Weatherill House
8 Mint Walk
Croydon CR0 1EA

12th December 2013

Dear Sir or Madam

East Coulsdon Residents' Association Objection to Cane Hill Planning Application 13/02527/P

East Coulsdon Residents' Association represents just under 2,000 households on the eastside of the Brighton Road from Marlpit Lane, Coulsdon to the Borough Boundary with Surrey and also includes the Coulsdon Woods Estate and the roads leading up to Old Coulsdon. The large areas of Farthing Downs and Happy Valley Green Belt are also within our area.

Summary : We believe that **The Cane Hill Site** should be a catalyst for the regeneration of Coulsdon Town Centre and surrounding area. We see the Cane Hill development as assisting with this process and we wish to see a development that complements the Town Centre not competes with it, providing opportunities for local people.

However, we are of the view that the present plan without an additional access directly to the A23 Farthing Way Coulsdon Bypass will unnecessarily contribute to traffic congestion in the town centre and encourage rat running and unnecessary use of secondary residential roads in both east and west Coulsdon.

We believe that the Transport Assessment by Mayer Brown is faulty in that :

- It underestimates the car ownership and usage from the Cane Hill development.
- It underestimates the effect that increased Cane Hill traffic will have on the Marlpit Lane Roundabout.
- It fails to take account of additional traffic from other developments and the Waitrose distribution centre and their effect on the Marlpit Lane Roundabout.
- It underestimates the effect on Lion Green Road and Chipstead Valley Road
- It underestimates the negative effect increased traffic will have on surrounding secondary residential roads on both east and west side of Coulsdon.
- The comparative roads used in the TA are not typical of Coulsdon.
- It does not examine the positive advantages of providing additional access from the A23 Coulsdon Bypass.

East Coulsdon Residents' Association wishes to register its objection to the Cane Hill Planning Application 13/02527/P. Our main objection is on traffic and the failure to provide an additional exit directly on to the A23 Farthing Way Coulsdon Bypass to relieve the increased traffic on the Marlpit Lane Roundabout, The Chipstead Valley Road/Lion Green Road Junction.

Key Transport issues for the Cane Hill site

Car Ownership : The recent 2011 census on car ownership shows that fewer people in Coulsdon have one car compared with the rest of the UK, but more people in Coulsdon have 2 and 3 or more cars (table 1).

Table 1		
Car per household	UK	Coulsdon
1 Car	77%	61%

Affiliated to :

2 Cars	20%	23%
3 or more	5%	8%

Although Coulsdon is in Greater London it has a car ownership more in line with Surrey than London reflecting its outer London position and its closeness to the Surrey Border. Cane Hill being a new development, in its initial years is likely to attract much younger families than the existing population of Coulsdon which in the east ward is much older than the average in Croydon as a whole. These families are more likely to have two or more cars per household.

We are of the view that new residents of Cane Hill will have a car ownership higher than the existing population of Coulsdon and this is also reflected in the parking provision of 2.5 car spaces per household (table 2). As there will not be a bus service on Cane Hill until a later stage and the topography of the site will not produce the forecast number of cycling and pedestrian trips. This will lead to more car use than forecast in TA 4.4.

Car Ownership	
UK	1.2
London	0.76
Surrey	1.5
Coulsdon	1.5
Cane Hill	2.5 based on parking provision TA page 27

Mayer Brown TAs : In the original Mayer Brown report of February 2013 and of July 2013 they have sampled traffic in a number of surrounding roads in Coulsdon and Chipstead. These include Howard Road, the Netherlands, Stoats Nest Village and Highwold. Although these are a reflection of streets to the north, east south and west of the Cane Hill development.

They are not representative of traffic in the majority of residential streets in the Coulsdon area as whole, all are cul-de-sacs and not one of them has more than 60 properties compared with 677 on the Cane Hill site. A better selection of streets would have included roads such as Rickman Hill, St Andrews Road and Reddown Road where there are a complete range of properties and a greater number of households reflecting better the range of houses that will be constructed on the Cane Hill site rather than based on larger houses in the Mayer Brown chosen locations.

ECRA assessment of traffic: We are of the view that traffic flow to and from Cane Hill will be higher than that stated in the Mayer Brown report CH 4.4. We base this on the fact that car ownership in Coulsdon although in London is nearer that of South East England. The last census puts car ownership in Coulsdon at 1.5 per household. The number of units has risen by 6% from 640 units to 677. We estimate that traffic entering and leaving Cane Hill could be as much as 20% higher than the Mayer Brown report

Internal road lay out and access to the site : We believe that Cane Hill site should not be a large cul-de-sac and must have more than one exit including at least one to Portnalls Road. There should be the ability to drive through the site, but the road system should be laid out in manner so as not to encourage rat running. We are of the view that the internal road layout should support a local TfL bus route than can drive through the site to serve the surrounding local areas as well as Cane Hill.

To enable traffic that does not need to access Coulsdon Town centre there should also be easy access to the A23 Coulsdon Bypass with an additional access constructed to the north of the existing footpath 944 to Coulsdon South stations. It is our view that this additional access would ensure that the proposed Portnalls Road Access remains a secondary access.

The effects on Marlpit Lane Roundabout : We are of the view that the **Mayer Brown Transport Assessment CH 4.4** is wrong in its calculation of the volume of traffic that will use the proposed main access to Marlpit Lane roundabout and the effect that the increase traffic will have on congestion at the Marlpit Lane roundabout. This in turn will have a direct effect on the volume of traffic using the Portnalls Road access.

In the Mayer Brown report of November 2012 (figure 3.1) *using only the Marlpit lane Roundabout access* they estimate that the number of vehicles departing 321 and arriving 207 the site between 8.00 & 9.00 total movements 528 and for the evening (figure 3.2) departing 230 & arriving 262 between 17.00 & 18.00 total movements 492 (table 3).

This also shows that 47.3% of the traffic departing in the morning would want to go directly on to the A23, with 23.6% going north towards Croydon and 23.6% going south towards the M23 and 50% of arriving traffic that would want to access the site from the A23, with 24% from the M23 and 36% from Croydon.

In the evening 47.8% of traffic would want direct access to the A23, with 26% towards Croydon and 21.7% to the M23 and 53% of arriving traffic would want to access the site from the A23, with 27% from the M23 and 26% from Croydon

Time	Departing	Arriving	Total	A23 north to Croydon	A23 south to M23	Total
8.00 – 9.00	321	207	528	23.6%	23.6%	47.2%
17.00 - 18.00	230	262	492	26%	27%	51%

In the latest Mayer Brown Transport Assessment CH4.4 which includes the Portnalls Road access and as a result reduces the number of vehicles departing the main access between 8.00 & 9.00 to 199 and arriving 108 total movements 307 and for the evening departing 158 & arriving 242 between 17.00 & 18.00 total movements 400 (table 4).

In the traffic distribution report page 9 (95 of the main document) Mayer Brown estimate that 45% of the traffic to and from Cane Hill would want to access the A23 to Croydon and 9% would want to access the A23 for the M23 and 9% would want to Access the M25 junction 8 via Chipstead (this reduction is accounted for by the second access to Portnalls Road and the traffic accessing the M25 via Chipstead).

Page 108 Figure 2.8 shows similar demand for the Bypass from Cane Hill

Time	Departing	Arriving	Total	A23 north to Croydon	A23 south to M23	Total
8.00 – 9.00	199	108	307	45%	13%	57%
17.00 - 18.00	158	242	400			

The report also estimates that 9% would access the M25 junction 8 via Chipstead & 3% via Holyme oak Rd from Portnalls Rd.

The A23 Coulsdon Bypass Farthing Way was constructed to divert traffic on the A23 away from Coulsdon town centre to improve the environment, air quality and make the town centre more attractive to shoppers and pedestrians. Not having an exit from Cane Hill directly on to the A23 Coulsdon Bypass will have the opposite effect by increasing traffic in the town centre. We want people to come to Coulsdon to do business and spend time there not to come there because they have no alternative, but to add to the traffic.

Operation of Marlpit Lane Roundabout : We believe that the Mayer Brown Report CH 4.4 is flawed in the assessment of the operation of the Marlpit Lane roundabout. It is argued in the report that the roundabout currently works fine, and will continue to do so with the inclusion of Cane Hill development traffic. The report suggests **no more than one vehicle queues on the approaches in the peak periods. As local residents we know this is not the case. Even in the TA report on pages 285 and 286 show the results of queue length surveys. These demonstrate large queues in excess of 100m or 24 cars that have clearly been ignored.**

In the following four Photos taken between 8.00 & 9.00am on Friday 19th August 2013 when traffic is at its lowest in the holiday season clearly show queues forming at all arms of the roundabout.



1 Marlpit Lane approach



2 Brighton Road to Marlpit Lane southbound



3 Marlpit Lane to Brighton Road



4 Brighton Road to Lion Green Road

The queue in Marlpit Lane (picture 1) is clearly in the order of that found on pages 285 & 286 of the TA report. The northbound queue (picture 4) from Marlpit Lane Roundabout on the A237 Brighton Road stretches from the roundabout to Lion Green Road/Brighton junction and into Lion Green Road as far as the junction with Chipstead Valley Road Junction.

The TA report does not take into account the increases in traffic from other developments such as the Waitrose distribution centre to be opened some 500 metres for the Marlpit Lane roundabout in Ulswater Crescent and the residential developments in Caterham on the Hill where the main route to Wallington. Sutton, Banstead, Kingston and the M23 will be via Marlpit Lane and the Marlpit Lane roundabout.

We believe that the models are completely wrong, and do not represent what is happening on the ground now and what will happen in the future. As a result, the TA CH 4.4 cannot be relied on to demonstrate that this junction can accommodate the traffic from Cane Hill.

What are the other effects of not having an access direct on to A23 Coulsdon Bypass ?

The Knock on effect of not having an access directly on to the A23 Coulsdon Bypass will also be increased traffic and congestion between Marlpit Lane roundabout and Lion Green Road and Chipstead Valley Road Junction. On page 107 of the TA report, it shows 13% of Cane Hill traffic wishes to access Lion Green Road and 12% wishing to access Portnalls Road to the north and another 12% wishing to access Portnalls Road to the south.

Page 107 for Cane Hill traffic shows the 5% wanting to access Marlpit Lane, 13% Lion Green Road and 58% the A23 directly. Forcing all A23 related traffic via the Marlpit Lane roundabout will cause further delays to traffic heading for Lion Green Road. We believe this will distort this ratio and lead to more people choosing the secondary access of Portnalls Road to avoid the delays at Marlpit Lane roundabout and in Lion Green Road.

The results of the TRANSYT capacity assessment on pages 49 to 50 show that for the existing signal junctions of Lion Green Road (A237) with Brighton Road (A237) and Chipstead Valley Road (B2032) with Lion Green Road. That at present Lion Green Road is operating at 88% Chipstead Valley Road is at 84% saturation during peak hours. When the cumulative effect of the Cane Hill developments are taken into effect they show that Lion Green Road rises to 90% and Chipstead Valley Road rises to 94% (page 51).

A theoretical capacity for a signal controlled junction in Greater London is usually assumed to be around 90%. It is therefore apparent that the Cane Hill proposals will result in the junction being theoretically over capacity, and no mitigation measures are suggested or proposed to alleviate the situation. Furthermore, this does not take into account the effect other developments in Coulsdon such as the Waitrose distribution centre and the residential developments at Caterham on the Hill.

We believe the impact will be far greater than that in the TA report CH 4.4. The following pictures taken at 4.00pm on Thursday 18th August 2013 show queues in both Lion Green Road (picture 5) and Chipstead Valley Road (picture 6) that exceed the capacity of the traffic lights to clear the junction in one green phase.



5 Lion Green Road from Brighton Road 6 Chipstead Valley Road from Woodman Road

The Effects of Not Having an Access Directly On To The A23 Coulsdon Bypass : We are of the view that the cumulative effect of not having an additional exit directly on to the A23 Coulsdon Bypass will be increased congestion and queuing at the Marlpit Lane Roundabout, in Lion Green Road and Chipstead Valley Road junction. More pollution and a deterioration of the environment in the town centre. This additional traffic and delays will lead to an increase in use of the secondary exit in Portnalls Road and to Rat Running in Portnalls Road Portnalls Rise, St Andrews Road and Holyme oak Road on the west side of Coulsdon and Reddown Road, Fairdene Road and Downs Road on the east side of Coulsdon

The Additional Benefits of an Access Directly to the A23 Coulsdon Bypass : We are of the view that a direct access to the Cane Hill site from the bypass is essential to relieve the town centre, Marlpit Lane roundabout, the Lion Green/Chipstead Valley Road junction of traffic and maintain the volume of traffic using the Portnalls Road access at a level comparative with a secondary access.

We also believe that there a many other benefits as well and these include :

- Reduction of traffic pollution and improvement to the environment in Brighton Road and Lion Green Road, particularly for those wishing to walk or cycle to the town centre, the railway stations or bus stops.
- It reduces the journey distance and time to and from Cane Hill site from the A23 reducing both fuel cost and CO2 emissions for residents, visitors and deliveries.
- Reduction of rat running in local roads in both East and West Coulsdon.
- Reduction in the traffic levels leaving Cane Hill using Chipstead roads to reach the M25
- Improved safety to footpath 944 where it crosses the A23 Farthing Way.
- Improved control of traffic flowing on the bypass.
- Improve the rate of traffic joining the Bypass compared with the existing Marlpit lane slip road junction.
- Easier access of a bus route through Cane Hill to and from Coulsdon South station.
- It would improve pedestrian safety across the Marlpit Lane roundabout exit from Cane Hill as this is major pedestrian route to and from Coulsdon South Station and the local schools in Portnalls Road.
- Reduce the affect of traffic fumes and pollution in the town centre.
- If constructed as part of phase one future construction traffic could use this access without causing congestion in the town centre or on local roads.

Where to site a new access on the A23 Coulsdon Bypass to Cane Hill ? We are of the view that there is one suitable site where a new access to the Cane Hill site could and should be constructed at low cost. This site is situated just to the north of where footpath 944 crosses the bypass and by the second new footpath that leaves the bypass for the Cane Hill site just at the southern point of the proposed loop in the new access road to phase one.

This point is where the existing Cane Hill drive is adjacent to the bypass (less than 7metres) and at the same level. We believe that cost of providing access here with a traffic light controlled junction on to the bypass is minimal and could be included in section 106 or CIL monies as a benefit to the local community.



7 Site of proposed access point

8 Shows footpath 944 crossing the Bypass

Picture 7 Show the point where new footpath (blue sign) from Bypass is level with Cane Hill Drive (Lamp Post) only 7metres from away. Picture 8 show the existing footpath 944 where it crosses the bypass just to the south of our suggested access point.

Advantages of this point.

- The Cane Hill drive and the Bypass are close at 7metres.
- The Cane Hill Drive and the Bypass are level.
- There would be no loss of green belt land.
- The junction would not be visible from the Cane Hill site nor from other local residential roads as it is behind an embankment.
- It would require very little work on the bypass itself.
- It would make good use of part of the disputed Bus Lane.

Other issues on the rest of the Cane Hill planning application.

1. **Layout of the site** : We support the proposal to develop the Cane Hill site into a number of different areas in three phases The Hill, Gateway and Southern developments. We believe that putting apartments and low cost housing near the Town Centre is a sensible one. We would also like to see some retirement homes provided on the site. We also strongly support the proposed linking with the town at the junction of Lion Green Road and Brighton Road with commercial development. Barratt Homes must work with Croydon to ensure that the land at the eastern end of Lion Green Road is developed jointly with a common plan to enhance the linkage to the town centre.
2. **Type of housing** : Work undertaken by Croydon Council show that the demographics of the local population have changed considerably over the last decade. Today there is now a large proportion over the age of 55 and Coulsdon has an older population than most other parts of Croydon. The Cane Hill development provides a unique opportunity to address this. Therefore it is important that the Cane Hill development has a range of housing from small apartments to larger family houses. At present there are insufficient smaller properties in Coulsdon to encourage younger people to the area and for older people to down size to. Cane Hill provides a unique opportunity to address this problem by providing a range of homes from small two bedroom apartments to larger family houses.
3. **Quality Housing** : The Coulsdon Masterplan indicates the there is a need for a range of housing from family sizes to small houses with gardens and apartments. These should be of quality design with adequate room sizes to cater for existing furniture. Building materials should reflect existing local designs (*we do not want revolutionary designs which become slums in 10 years*). Houses and apartments should have adequate onsite parking and must be able to cope with the Council's recycling programme and have adequate hidden storage for waste and recycling bins. A limit of 4 storeys should be put on housing (in line with the previous maximum ward height) at the southern site at the top and 5 storeys at the Gateway site at the bottom of the site.
4. **Retirement Homes** : Studies undertaken by McCarthy Stone and others have shown that where older people are forced to move more than a few miles from existing homes, friends and relative their quality of life is reduced and they become more isolated and more depended on social services. To reduce the problem it is best to provide a mixture of housing including retirement homes in every community. The Cane Hill and the Town Centre redevelopments provide an opportunity to provide retirement homes near the town centre close to shops, doctors and public transport.

5. **Commercial Development** : Should not be in competition with local Town Centre retail outlets, but should complement them. The area at the northern end of the site is a suitable area that could be used for a budget style hotel or other commercial activities that do not compete with the existing retail outlets. This must be integrated with other developments in Coulsdon town centre and Lion Green Road and not be developed in isolation.
6. **Leisure facilities Young People** : Coulsdon is in need of leisure facilities especially for young people in the 11 to 16 age range. We believe within the development there should be leisure facilities for this age group and this should include a fishing lake and a skate park and these should be open to the public at large.
7. **Protecting the views** : Cane Hill is on a predominant site rising in height to the south of town and can be seen from everywhere in the surrounding area. We would like to protect as much as the green outlook as possible from all the surrounding area. This includes views from Old Coulsdon, Farthing Downs, Coulsdon West, Woodcote and Hartley areas. In particular we would want to keep as much as possible of the view from Marlpit Lane and Rutherford Rise areas of the open field near the east side piggeries.
8. **Non traffic access** : We are pleased with the proposed pedestrian, cycle and bridle routes within the site, linking to the Brighton Road, Lion Green Road, Portnalls Road and Hollymeoak Road. We strongly support the new pedestrian route from the site to just south of the schools in Portnalls Road to make walking to and from school attractive.
9. **Ancient Monument & London Loop** : We very much welcome creating a new pedestrian route to Lion Green Road and opening up the Ancient monument of the Surrey Iron Railway embankment to the public and the diversion of the London Loop footpath via this route.
10. **Circular bridle way and footpath** : There should be a circular footpath and bridle way completely around the site around the site. To allow safe pedestrian, cycle and horse riding and free movement of local wildlife. This must be established before detailed planning for phases 2 and 3 are agreed.
11. **Green barrier behind schools** : We are pleased that a green barrier has been included behind the two Schools Smitham and St Aidan's in Portnalls Road. This should maintain the natural open environment for local school children.
12. **Cane Hill Farm** : This plays an important part in Coulsdon's local economy and should not be lost. The existing farm should be maintained on the site. We would strongly support moving the farm to an alternative site at the southern end of site to form a green barrier between the new houses and the area to the top of Portnalls Road.
13. **The Remaining Buildings** : We are very keen to keep the existing buildings and incorporate them into any new development. For over 150 years **the Tower** has been a dominant landmark that can be seen from all the surrounding areas and this should remain. We would also like to see it put to a use where the public could benefit from the views of the surrounding areas that the tower provides. **The Chapel** is also very attractive and its features should be kept in any development. **The Admin building** was very attractive prior to its collapse after the fire. If it is not possible to entirely reconstruct it then its general design and clock tower should be incorporated into any new building. We would like the existing building incorporated into a commercial development which might include a restaurant, conference complex or small commercial workshops. If this is not possible they should be used for housing.
14. **Phase. Three the Hill site** : We are of the view that this should be developed with a range of smaller properties and at a higher density than is proposed with a limit of 4 storeys on housing (in line with the previous maximum ward height). We are of the view that this would provide more suitable properties for young people to purchase and for older local residents to down size to. Studies by Croydon Council show that the local population is much older than the average for Croydon as whole. Provision of good local bus service would also make these smaller properties attractive to older people.
15. **Green Belt** : Reducing the size of the properties and increasing the densities in phase three the Hill site would reduce the amount of green belt land that is to be taken and allow a more open environment for local wild life.
16. **Green Belt Management** : The Cane Hill site is situated within Green Belt and we believe this needs to be managed to provide new and improved opportunities for public recreation such as walking, cycling and horse riding, while protecting the existing fauna and flora and wildlife. As much of the existing tree-scape as possible should be kept
17. **Internal Bus service** : At the earliest possible opportunity there should be a good bus service from the site providing links to the town centre, stations and other bus services. **Any bus services should run through the site providing a service to existing areas as well.** An exit from the development on to the A23 Coulsdon Bypass would facilitate better connections to Coulsdon South Station as well as the town centre.

- 18. Public Art :** The development should also contribute to public art on the site and in the Town Centre associated with Cane Hill's past and the Town Centre history.
- 19. Naming of streets** and locations should traditional local names and not modern trendy names. Proposed names should be discussed with the local Residents' Associations and the Bourne Society (the local history group) before being finalised.
- 20. Education:** Adequate provision must be made to accommodate the children of new residents in the local schools, but this must not be at the expense of children of existing residents. There is already a problem with school places at Coulsdon Schools being allocated to children from further afield including those from outside the Borough, whilst Coulsdon children have been allocated places in South Croydon and Kenley, passing the local schools on their way to school. The borough as a whole has a shortage of school places and the Cane Hill development will increase this demand and shortage of places.
- 21. Local Employment:** Barratt Homes and other contractors on the site should be encouraged to employ local people and also use local services where ever possible to help support the local economy during and after construction.
- 22. Public Provision from Section 106 or Local CIL Monies :** It is important with the Cane Hill, Lion Green car park and a number of other developments in the Coulsdon area that the public realm in Coulsdon is improved. The section 106 and local CIL should be levied from all of the developments associated with the Cane Hill and Lion Green Road site plus any other large and small developments in the Town Centre and surrounding areas including Ulswater Crescent.

The money collected from section 106 or the local CIL should be used for improving the public realm specifically for Coulsdon, providing the following :

- An additional Access to Cane Hill from the A23 Farthing Way Coulsdon Bypass
- Provision towards step free access to Coulsdon South Station.
- Facilities for the young including a skate park and fishing lake.
- Public art on the Cane Hill site and the Town Centre
- Improved facilities for the local scout groups.
- Improved leisure facilities.
- Improved CCTV in the Town Centre.
- Improved car parking.

Charles King

Charles King MBE

Chair : On behalf of East Coulsdon Residents' Association

Copy : Cllrs Mike Fisher & Jason Perry, GLA member Steve O'Connell; Local Coulsdon Councillors, Marcia McGinty Barratt Home