



WELCOMES AND UPLANDS ROAD ASSOCIATION

www.wura.org.uk

Development Management
Planning and Strategic Transport
Place Department, 6th Floor, Zone A
Bernard Weatherill House
8 Mint Walk
Croydon
CRO 1EA

Attention: Mr J. Goodwin-Roberts, Case Officer

23rd October 2020

Ref 20/05075/FUL

Dear Mr Goodwin-Roberts

Re: Proposed development at 1 Kearton Close, Kenley, CR8 5EN: Full planning application for the demolition of a single-family dwelling and erection of one 3 and 4 storey block, containing 2 x 4 bedroom and 2 x 2 bedroom semi-detached Houses and 2 x 1-bedroom, 8 x 2 bedroom and 5 x 3 bedroom Apartments in total 19 Units with associated access, 23 parking spaces, cycle storage and refuse store.

As always, WURA are concerned with the impact on the roads in the area, the impact on the environment and the safety of all road users, particularly pedestrians and cyclists on Welcomes Road itself, a designated footpath.

There are so many reasons that this application should be **REFUSED**, especially remembering that this is NOT within the Focused Intensification Zone, but even focusing purely on the road and environment related elements, WURA requests that this application be **REFUSED** on the following multiple grounds:

1. Incorrect Traffic Information and Inadequate Parking Capacity

There is a complete disregard for accuracy in the Transport Statement.

There are multiple references to parking being available on nearby roads (section 3.6), statements that parking is unrestricted and even an analysis of how many cars could be parked on Uplands Road. Appendix 3 of the Traffic Survey even implies there is low demand for on-street parking. There has been a complete failure to recognise that **no parking is allowed on these roads**. The parking restrictions are clearly signed and immediately obvious to anyone researching the WURA area.

There is no reference to the fact that the access routes are Public Footpaths and the impact that the increased traffic from this level of intensified development will bring. The importance of local road safety needs to be fully understood. The laudable intention of the Council is to get residents out of their cars, but the roads must be safe spaces for those pedestrians and cyclists. Pedestrians already feel unsafe using the local roads without pavements as they are typically narrow and speed bumps make little impact on typical traffic speed. The new developments will increase the number of local users as well as the flow of delivery vehicles and construction lorries.

Chairman	Colin Brown	Willow Cottage	161 Welcomes Road	Kenley	CR8 5HB	Tel 020 8668 2101
Secretary	Richard Russell		12 Zig Zag Road	Kenley	CR8 5HA	Tel 020 8668 7293
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Worse still when these new dwellings are occupied and delivery vehicles and service vehicles vie for forecourt space probably necessitating reversing into the road.

Although strictly speaking 23 parking spaces for 19 properties may exceed the London Plan standards, it is extremely disappointing that the proposer appears to have had pre-application advice that this capacity is acceptable. Car ownership in Kenley is over 83% of households with 38% of those (ie 46% of properties) having multiple cars. Accepting that the flat dwellers would probably not be in the 10% of the 83% owning 3 cars or more, there are four houses as well as the flats and it is still a virtual certainty that many of the people residing in these properties will have more than one car. The site has a PTAL of 0 and is located at the top of a steep hill from the main public transport routes (train and A22). The direct access to those routes is along roads without pavements, especially dangerous for those with young children and prams, making it even more likely that high car usage is inevitable.

As is typical of the proposals we have seen recently, there is no accounting for the parking capacity needed for visitors, deliveries or workmen. While this approach may be appropriate for many locations it is entirely wrong when no parking is allowed on the surrounding roads.

The swept path analysis diagrams have some very interestingly angled lines which appear entirely unrealistic, especially when considering the refuse trucks.

2. Inadequate Construction Management Plan

Given the location of the site in an area where walking is highly prevalent, WURA believe that the construction should be undertaken to the CLOCS Standard, which we understand the London Borough of Croydon has already embraced. This commitment to the CLOCS Standard should be embedded throughout the Construction Management Plan.

The proposers have made no attempt to contact WURA to discuss their plans in any way. The requirements of developers in the WURA area are publicly available on the WURA website and include restrictions on the times of deliveries "Deliveries should be made to the site after 10.00 am and before 3pm". The proposed plan even suggests some deliveries taking place before 8am when the site would not apparently even be operating.

The access for large deliveries looks entirely inadequate, especially with the limited maneuvering space available once the building walls are in place. It does not look viable for large items to be unloaded within the site boundaries as stated in the plan. We have ample recent experience of road blockages caused by such deliveries, and in this case with the site being at the entrance to a cul-de-sac any such blockage simply cannot be allowed as there would be no alternative route.

No mention is made of the long-established nursing home adjacent to the site and the impact on its residents during the construction phase. Special allowance should be made for their needs.

There is no indication of where proposed holding areas would be. Given the limited parking and poor visibility on roads in the wider area this needs to be properly defined.

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3. Contravenes the Croydon Local Plan

The overall design and layout of this application goes against many of the policies stated in the CLP and the SPD2. Para 6.58 of the CLP states there should be “Evolution without significant change of area’s character” and para 6.59 states “new development should not adversely impact on the predominant character. Policy SP1.2(a) states “Development proposals should respond to and enhance local character, the heritage assets and identity of the Places of Croydon”. Why were these policies even stated if they are just being completely ignored?

This application represents another attempt to capitalise on an inappropriate “windfall” site, contrary to the Examiner’s response to the Draft London Plan. Applications such as this one go directly against the Examiner’s guidance, specifically in terms of Windfall targets and the approach to existing special character. At the very least this application should be held in abeyance until the details of the London Plan are finalised and incorporated appropriately into the CLP. Given the current complete contradiction between the Examiners and this application, it should be rejected.

4. Environmental Impact

The proposal already acknowledges the removal of 16 trees on the site and it is clear from the schematics that the canopy of many of the remaining trees actually touch the proposed building. Is it really likely that these will remain? There are a number of ancient oaks protected by Tree Preservation Orders immediately adjacent to the site and it would be impossible for the proposed development to take place without an adverse impact on their root system.

The proposals would mean that well over 80% of the site will be either built on or hard-landscaped. Kenley and particularly the area adjacent to Kenley Common (as this site is) was identified by Croydon as part of the Green Grid. The overall impact of developing (let alone over-developing) individually relatively small sites MUST be considered - “these include the consequences for the special character of an area including green cover and tree canopies, for health and social infrastructure and for transport”, as specifically stated by the Examiners of the Draft London Plan

The recent Government report, Living with Beauty, states the importance of a green environment and specifically, in Policy Proposition 6, that non-negotiable infrastructure includes green infrastructure. This is not only for maintaining a pleasant environment for the residents, but more fundamentally is part of eradicating the UK’s net carbon contribution. The green environment in areas such as Welcomes and Uplands Road, with its mature trees, cannot be re-instated once destroyed and their benefits will be lost for future generations.

There is no provision for electrical vehicle charging.

5. Waste Management

The plan does not provide adequate space for recycling facilities given that there are three categories of waste to be stored. The proposal does not meet the requirements of the Croydon Local Plan Policy DM13.1

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The statement in the plan is that large multi-property bins will be used. The refuse store itself seems too small for the number of properties given that there are three categories of waste to be stored. There are no 1100l bins for residential properties currently on Welcomes or Uplands Roads. Can the recycling vehicles currently covering this route cope with them? Is there really adequate space for them to be emptied within the site given the strange looking curves in the swept path analysis?

Inadequate provision will have an impact on the immediately surrounding road with clutter from bins which can not be housed appropriately and road blockages.

6. Cumulative Impact

As WURA has stated many times, Croydon Council must take into account the cumulative impact of so many multiple dwelling applications on such a small area of Kenley. We are now looking at a total of 10 such development on Welcomes Road and Uplands Road alone. Many more developments are in place within the immediate area of this current application. The local health care provision is already overwhelmed before the new properties are even occupied. The infrastructure of the drainage and gas supply cannot cope with the increased capacity. Irreversible damage is being done to the green environment of the area.

WURA requests that the application be REFUSED and again request that a moratorium is imposed for a defined period while the cumulative impact of so many large developments in a such a small area can be properly assessed and in terms of the new zonal plan the type and design of buildings agreed upon taking into account the need for sustainability.

Yours sincerely

Richard Russell
Secretary

Colin Brown
Chairman

Cc (by email): - Nicola Townsend, Head of Development Management
Heather Cheesbrough, Director of Planning and Strategic Transport
Steve O'Connell – Councillor
Jan Buttinger – Councillor
Chris Philp - MP
KENDRA

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