



# WELCOMES AND UPLANDS ROAD ASSOCIATION

www.wura.org.uk

The Planning Inspectorate  
Temple Quay House  
The Square, Temple Quay  
Bristol  
BS1 6PN

FAO Case Officer: Mr James Pocock

9<sup>th</sup> July 2022

Ref APP/L5240/W/22/3295657

Dear Mr Pocock

**Re: Proposed development at 2 Kearton Close CR8 5EN: Proposed flatted development within the rear of no. 2 Kearton Close to comprise of three units including landscaping, cycle and refuse store.**

The Welcomes and Uplands Road Association (WURA) has a membership of over 230 households and is responsible for the maintenance of the roads in the area. WURA is very concerned with the impact of new developments on those roads, the impact on the environment and the safety of all road users, particularly pedestrians and cyclists on a designated footpath, as well as the amenity of WURA members.

The developer has appealed to the Planning Inspectorate to reverse the rejection decision made by Croydon Council in October 2021. This application was made following an earlier application also being rejected on similar grounds. No material improvements were made in the areas of contention between the two applications.

We feel very strongly that the Council's **rejection should be upheld**, and that the developer has made no meaningful response to the grounds for that decision.

***Croydon Council Refusal Reason 1*** "Given the height, scale and massing the proposal would result in a dominant and disproportionate development on the site and would therefore fail to positively contribute to the street scene thereby the proposal fails to comply with Policies SP4 and DM10 of the CLP and the SDG - Suburban Residential Development (2019)."

The applicant's response to this appears to draw on comparisons to the approval of an application on the neighbouring plot. In reality, the bulk of the single block being proposed behind an existing bungalow is not comparable.

The elevation in this proposal does show a slight increase in the roof height and hipped rather than 90-degree corners to try to reduce the impact of the scale and massing from the applicant's original design. It is noteworthy though that all the upper storey windows are retained with only a slight decrease in size for the one to the left of the front elevation. This means the block will still completely dominate its immediate surroundings.

***Croydon Council Refusal Reason 2*** "The access road serving the site is too narrow to enable pedestrians and vehicles to use it safely. Insufficient information was submitted with regards to access and insufficient details for the swept path analysis were submitted. The proposed cycle store fails to meet the required standards and the proposed bin store exceeds the minimum drag distances for both residents and waste operatives. As such, the proposal would be contrary to Local Plan Policies DM29 and DM30."

Chairman Colin Brown Willow Cottage 161 Welcomes Road Kenley CR8 5HB Tel 020 8668 2101  
Treasurer Janice Scully 36 Church Road Kenley CR8 5DU Tel 07872 604583



## WELCOMES AND UPLANDS ROAD ASSOCIATION

[www.wura.org.uk](http://www.wura.org.uk)

---

This issue is fundamental to the site and can not change given the location of the existing bungalow at the front of the site. The applicant's letter which attempts to counter each of the objection reasons simply does not address this limitation.

We can clearly state the problem: the narrowest part of the drive past the existing property at no 2 is barely 2.5m wide and it is telling that in all the applicant's diagrams the corner of the existing property is either shown as slightly cut-off at the corner which meets the driveway or actually juts out into the area shown as the driveway.

To get to the recycling area, residents would have to pass the vehicles parked in bays P3 and P4. Given the narrowness of the drive, especially given that the bays as shown on the plans are not as wide as many typical cars, this becomes a dangerous trip.

There is no capacity for the recycling being made available for collection at the roadside, which would block the road and severely harm the amenity of the occupants of the neighbouring properties. It is not reasonable to state that *"the occupants of the dwellings will place their refuse bins in the designated area to the front of the site on bin collection days – a perfectly normal process in residential areas"* without making space available for the increase of 3 times as many bins to be collected, something this site plainly does not have the capacity to support.

Separately, the parking spaces are not the requisite width or length, most definitely for spaces P3 and P4, one of which is meant to be for disabled access. Any vehicle parked in these bays would have to be blocking the driveway. Disabled bays are meant to be at least 3.6m wide, clearly not the case here.

The applicant has provided more swept path diagrams as requested but the turning space provided is extremely tight and certainly for deliveries will result in vehicles having to reverse down the narrow, long drive. The need for such dangerous manoeuvres should not be acceptable. The proposal continues to fail to meet the CLP Policies DM29 and DM30.

***Croydon Council Refusal Reason 3*** *"The proposal would result in the complete removal of twenty four trees. As such, this is contrary to Local Plan Policies DM27 and DM28 which seeks to preserve and maintain existing trees in development sites."*

While replanting and replacement schemes are laudable, it takes many years for the overall environment to recover from the removal of mature specimens. An individual development proposal may not have to think about the overall impact of multiple developments in a small area, but the cumulative impact of developing (let alone over-developing) individual 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 London planning states.

The 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 that covered by WURA with its mature trees cannot be easily re-instated once destroyed by over-development.

Given the unique benefits of the green locale, even on a general level, such intensification has to be *"harmful to the character and appearance of the area and therefore in conflict with Policies SP4 and DM10 of the Local Plan and Policies D3 and D4 of the London Plan, which amongst other things, seek to ensure developments*

Chairman Colin Brown Willow Cottage 161 Welcomes Road Kenley CR8 5HB Tel 020 8668 2101  
Treasurer Janice Scully 36 Church Road Kenley CR8 5DU Tel 07872 604583



## WELCOMES AND UPLANDS ROAD ASSOCIATION

www.wura.org.uk

respect the existing character and appearance of the locality in which they are sited", as stated in a recent Planning Inspectorate decision (L5240/W/21/3266351) for a nearby location in South Croydon.

**Croydon Council Refusal Reason 4** "The application has failed to adequately consider fire safety which could pose a risk to future occupants. The development conflicts with London Plan (2021) Policy D12."

The applicant has presented the results of a review by RGP Consulting Engineers Ltd. Our understanding from the Building Regulations (Fire Safety 2019 edition with 2020 amendments, Section 13) is that there should be access to within 45m of all points within the block of flats which means that the fire appliance would need to drive much further using the access drive along the side of the block of flats. The minimum width required for fire engine access is 3.7m.

The RGP drawings in the Grounds Of Appeal letter show a 'pumping appliance' of 2.5m width getting to within 68m of the far end of the rear block.

It is clear even in their own diagram that even a 2.5m wide a vehicle can not get passed the narrowest point of the drive, see snippet of image (right). Given that the minimum width required for fire engine access is 3.7m it is not even clear that a fire engine could even get very far on to the driveway at all.

It is obvious that any access to get close to the proposed dwellings will be difficult, especially if there are cars parked in the proposed parking area to the side of the driveway. As shown, bays P3 and P4 are not the requisite minimum of 2.4m wide and are certainly not 3.6m wide as is normal for a disabled bay. Any vehicles parked here will substantially block the already inadequate access route.

While we acknowledge the reference to a dry riser being installed "if required", the fact that the access is so restricted to the whole block presents a fundamental safety challenge.



**For all the reasons given above, WURA request that the original rejection of this application be upheld.**

Yours sincerely

Colin Brown  
Chairman

Cc (by email): Nicola Townsend, Head of Development Management  
Ola Kolade and Gayle Gander – Councillors  
Chris Philp – MP  
KENDRA

Chairman Colin Brown Willow Cottage 161 Welcomes Road Kenley CR8 5HB Tel 020 8668 2101  
Treasurer Janice Scully 36 Church Road Kenley CR8 5DU Tel 07872 604583