



# WELCOMES AND UPLANDS ROAD ASSOCIATION

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

FAO Case Officer: Joe Sales

6<sup>th</sup> February 2023

Ref 23/00084/FUL

Dear Mr Sales

**Re: Rahat, Pine Close, Kenley, CR8 5HX: Demolition of the existing dwelling and erection of 3 dwellings with associated access, parking, landscaping and cycle/refuse storage areas.**

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. We are therefore 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 these designated footpaths, and the amenity of WURA members.

It is on these grounds that we assess an application and these are the main reasons why we **OBJECT** to this proposal.

## Unsafe Access

The developer acknowledges that there is no turning space on Pine Close except at the end. It is important to understand that it is not a straight road and there is no clear view of the top of the road for a vehicle entering the Close from Welcomes Road. This can be seen on the only picture of the Close provided within the application, Figure 2.3 in the Transport Assessment. The increase in traffic resulting from additional housing means that there is a much greater likelihood of vehicles reversing out onto Welcomes Road, an extremely unsafe manoeuvre.

What is also clear from Figure 2.3 is that there are no sight lines for traffic exiting Pine Close on to Welcomes Road. In fact this has already been stated by the Council as part of the pre-planning process (para 43 of the Planning Statement). There is a mature tree on one side and mature hedging on the other. There is no proposed answer to this issue in the application as it is outside the control of the developer.

The Fire Statement indicates the intention that fire appliances would be able to access Pine Close and therefore get within the regulatory 45m. It is imperative that any such assessment is formally carried out by the London Fire Brigade (and not a structural engineer) before any planning permission is granted as it is unlikely that a fire appliance could access Pine Close given the restricted width and turning circle available on Welcomes Road.

Chairman	Colin Brown	161 Welcomes Road	Kenley	CR8 5HB	Tel 020 8668 2101
Exec Member	Robin Mc Callum	61 Welcomes Road	Kenley	CR8 5HA	
Treasurer	Janice Scully	36 Church Road	Kenley	CR8 5DU	Tel 07872 604583



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While these points are obviously not ideal for the current residents, they are certainly unacceptable as access to new housing.

In addition, the location of the proposed 'passing place', which in reality is the entrance to the new housing, is on the steepest part of Pine Close making it very awkward for drivers to pull in and out of.

## **Waste and Recycling Management**

The 'Access Road' paragraph of the Design & Access Statement states that "A further passing place is also proposed at the entrance to Rahat, which will double up as the bin collection point". Apart from the hazard of this proposal (blocking a passing place which the developer acknowledges is needed) it demonstrates a misunderstanding of the current access to the site.

Currently the Council bin lorries do not drive up Pine Close and will therefore not collect from the proposed location. The operatives actually walk up the Close to collect the recycling. Has this been taken into account and the Council Recycling contractors consulted? A significant increase in the amount of recycling to be collected would impact the current arrangement and may make it unworkable.

The current residents are not in a position to move their bins to the junction with Welcomes Road due to their age and the steepness of the track. Even if they were, the additional housing will mean a large number of bins which will either completely block the access route and/or clutter Welcome Road itself, increasing the danger for all road users. This application contravenes policy DM13.1 of the CLP.

## **Unsustainable Construction Method Statement**

The Construction Method Statement refers to the range of vehicles to be used, and given the quantity of spoil removal and the amount of deliveries to site these will most definitely include a significant number of journeys for the 3.5 tonne and above lorries. Given that the Council recycling lorry does not currently drive up Pine Close it is obvious that such vehicles cannot safely access the site.

We have already seen from the recent developments on Welcomes Road that HGV's have often been unable to turn on to sites due to the narrowness of the road, and most of these developments have had to do any loading and unloading from the road despite the best intentions in their Method Statement. It is not clear that the larger trucks, such as those for the spoil removal, would even be able to access Pine Close without multiple manoeuvres and damage to the immediate surroundings, completely unsafe and environmentally affecting all nearby residents.

The Statement refers to expanding the current parking area for the house as an initial task to allow vehicles to turn and exit the site. The Site Section shows a proposed drop in the site level by several meters. The amount of spoil removal involved to achieve this is significant, even just for the current parking area. The vehicles involved at this stage have no option other than to block Pine Close.

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Even once the enlarged space is available, it appears to be insufficient for vehicles to turn if large vehicles are delivering, so again it seems unlikely that this can be achieved without there being significant periods of time when the other residents of Pine Close will be blocked with no access route. This is unacceptable, the properties need to be accessible for emergency vehicles at all times.

## **Overdevelopment and Overlooking**

The proposal does not include any street scene elevations, either from Pine Close itself or the effect from Welcomes Road. Despite the proposed lowering of the site level, the height of the new properties will dominate the neighbours on Welcomes Road which is at a much lower elevation. We believe that if such elevations were included the dominant appearance of the proposed properties would become clear.

In reality, the application incorrectly references the properties on Welcomes Road and it is no. 118 which will be most directly impacted by the development. There is no reference to their loss of daylight and the potential loss of privacy should trees and hedging be removed from the borders. There is no consideration of the impact on no. 116, also a neighbouring property.

While there is a statement referring to the intention to retain the existing planting during construction, there is also a reference to removing existing mature hedging along the site frontage to Pine Close. Although the statement is made that this hedging will be replaced, it is proposed to maintain it at a significantly lower height, which will increase the visibility of the new development, including the hard landscaping, to all surrounding properties.

## **Impact on Trees and wider Green Infrastructure**

The Norway Spruce at the entrance to the site (marked as T1) is identified in the Arboricultural Appraisal and Impact Assessment as a tree which should be retained and protected. Given its location it is difficult to see how its root structure will not be adversely affected during the construction process as the HGV delivery vehicles (assuming they can reach the site) will have to drive over area within which the roots should be protected.

## **Out Of Keeping**

The proposed materials show a complete disregard of the surrounding properties and make no attempt to fit in. There are no other properties with blue/back engineering facing brickwork and with all the other external finishes being dark grey the overall image projected by these building will be dark.

Surrounding properties are typically of light appearance, with terracotta brick and tile finishes, as illustrated by both 'example' properties shown in the Planning Statement.

## **Disabled Access**

There is no provision for disabled parking.

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## Immediate Impact of Current Developments

We are now in a position where several developments have already been undertaken on Welcomes Road and we would request that a detailed CLP should include a quantitative analysis of any spoil removal and the expected number of HGV journeys to complete the development.

Given the construction and width of the road, few developers have managed to carry out their work without damage to neighbouring properties and the road itself. This needs to be recognised at an early stage in the process, so that the developer is made to adjust their plans to account for the impact of the required construction work on the neighbourhood.

The current developments have already had an impact on the Welcomes Road sewer with ongoing investigation work on the sewer underway by Thames Water. Verges and roadsides have been damaged by vehicles which are too large for the roads and road closures during deliveries and utilities work have impacted the surrounding roads in Kenley. We are seeing more of the approved developments in the area becoming active which will only cause further disruption. There has been no enforcement by the Council of the recommended routes for HGVs and Council staff have stated that there is no resource available to do so.

## WURA requests that this application be REFUSED

Yours sincerely

Colin Brown  
Chairman

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

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