



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 April 2021

Ref 21/00339/FUL

Dear Mr Goodwin-Roberts

Re: Proposed development at 1 Kearton Close, Kenley, CR8 5EN: Full planning application for the demolition of existing and erection of one X two storey plus accommodation in the roof 4 bed detached dwelling and erection of four pairs of semis comprising of 8X3 bedroom dwellings with associated access, 18 parking spaces, cycle storages and refuse stores.

The Welcomes and Uplands Road Association (WURA), which has a membership of over 230 households, is responsible for the **privately maintained and insured** roads in the area and is the 'street authority' with legitimate concerns about 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It does not seem long since we last wrote to you for the previous application on this site which of course was withdrawn. There were many compelling reasons for the rejection of that proposal and many of those apply equally to the new application, even with the change from apartments to housing. Unfortunately many people are emotionally drained from the detail of objecting to so many inappropriate applications in Kenley – we can see this from the numbers of objections submitted, especially as developers keep withdrawing and resubmitting.

WURA requested that the previous application for the same plot be refused (20/05075/FUL) and as we see insufficient improvement in the current proposal, our position is unchanged and we request that this application be **REFUSED**:

1. Impact on Roads and Traffic Safety

The Transport Statement, at least updated to recognise the fact that there is no parking on the surrounding roads (did the authors finally actually visit the location or did they just get a preview of the objections made to their previous application?) ignores the fact that the main access roads are narrow and dangerous. The fact that all road users (including walkers and cyclists) have to pass along an extremely dangerous narrow section at the bottom of Hayes Lane if using Abbots Lane is not mentioned.

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
Treasurer	Janice Scully		36 Church Road	Kenley	CR8 5DU	Tel 07872 604583



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This stretch of road in particular has already been identified by Croydon Council in their Community Plan as a highly dangerous route and is conveniently omitted from the pictures in Appendix 3.

We therefore submit our own picture of that part of the access required for this site for comparison to those provided within the application. **NOTE: this image is taken from Croydon Council's own document (Kenley Transport Study, August 2019).**



To indicate that “future residents will be able to access the site by sustainable modes of transport and will not be solely reliant on the private car” and that “good cycle infrastructure is also available” is a gross inaccuracy. All access to facilities requires the use of either Hayes Lane or Welcomes Road, with neither pavements nor cycle tracks. We also question whether the authors have tried cycling up the steep roads in the immediate area.

As before, 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. Worse still when these new dwellings are occupied and delivery vehicles and service vehicles vie for forecourt space probably necessitating reversing into the road.

2. Inadequate Parking

While we acknowledge that 18 parking bays have been included in the plan, we believe that some of them in particular are extremely narrow and any typical SUVs parked in the bays aligned with the access road would overhang the bay and impede access.

Providing one disabled space in one of the most ‘out of the way’ points of the site rather smacks of a token effort to tick a box.

There is no provision for electrical vehicle charging.

3. 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.

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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 outside the times the site will be operating, with no reference to WURA who are responsible for the safety of the surrounding roads.

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.

The number of parking spaces on site has actually been reduced, making the impact on the surrounding roads even worse than their previous proposal.

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.

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.

While the change from apartments to housing has brought some reduction in the level of hard landscaping, it is still clear that the proposals would mean a huge increase. 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.

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 surely does not meet the requirements of the Croydon Local Plan Policy DM13.1 despite the reference to "The refuse collection strategy has been agreed with LBC at the pre-application stage".

The suggestion that half the houses will move their recycling containers from their individual stores to the communal "front storage area" for collection would mean that the access road will be blocked once a week as there is obviously no capacity for those bins in the "front storage area" in the first place.

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6. Cumulative Impact

As WURA has stated many times, the impact of developing (let alone over developing) so many 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".

We make no apologies for repeating this information for all the current proposals and emphasise again that this application MUST be taken in its current context, which means we now have the following within Welcomes and Uplands Roads and its cul-de-sacs. This represents 120 dwellings in a small area of Kenley alone:

Already approved :

- No. 10 WR – 8 houses
- No. 32 WR – 9 flats
- No. 36 WR – initially 7, now 8 flats
- No. 42 WR – 7 flats plus 2 houses
- No. 56 WR – 9 flats
- No. 57 WR – 7 flats
- No. 60 WR – 7 flats plus 2 houses
- No. 35 UR – 6 houses
- No. 8 KC – 4 houses

Applications pending :

- No. 50 WR - 6 flats plus 2 houses
- No. 46 WR - 6 flats plus 2 houses
- No. 88 WR – 9 flats
- No. 90 WR – 3 houses
- No. 2 KC – 4 in-fill flats
- No. 1 KC – 8 houses (this proposal)

Applications under appeal :

- No. 52 WR – 9 flats

The Council are in the unique but critical position to take a proper overview of all these proposals as a whole. It is not sufficient to consider each independently, the impact of the cumulative effect must also be considered and even prioritised. The local health care provision is already overwhelmed before the new properties are even occupied. The infrastructure of the drainage and gas supply can not cope with the increased capacity. Irreversible damage is being done to the green environment of the area.

WURA requests that the application be REFUSED.

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
Jan Buttinger – Councillor
Chris Philp - MP
KENDRA