



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

FAO Case Officer: Mr J Goodwin-Roberts

16th April 2021

Ref 21/01326/FUL

Dear Mr Goodwin-Roberts

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

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.

WURA requested that the previous application for the same plot be refused (20/05606/FUL) and as we see no improvements in the current proposal, our position is unchanged and we request that this application be **REFUSED**:

1. Insufficient Access to Site : Major Safety Implications

Access to the site is extremely restricted. The narrowest part of the drive past the existing property at no 2 is barely 2.5m wide and it is telling that even the line drawn for the property appears to be slightly cut-off at the corner which meets the driveway.

Our understanding from the latest Building Regulations (Fire Safety 2019 edition with 2020 amendments, Section 13) that there should be access to within 45m of all points within a house which means that the fire appliance would need to approach using the access drive along the side of the block of flats. The minimum width required for fire engine access is 3.7m. We doubt if an emergency vehicle would be able to get close to the proposed dwellings, especially if there are cars parked in the proposed parking area to the side of the driveway. As planned, 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.

Even without issues over emergency access, the narrowness of the drive would be extremely dangerous for anyone walking along it, for example to access the recycling area, as there is simply no space for vehicles and pedestrians to pass each other.

The plan itself indicates a problem by accepting that the driveway cannot be set back 1m from the boundary. A proposal of "climbing plants on fence" seems rather inadequate compensation for a major limitation of the site.

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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How will vehicles deliver goods during the construction phase? Management of this site is completely impractical and it is a noticeable omission that the application does not include a logistics or operation plan for the construction itself.

2. Insufficient Parking Capacity and Extremely Poor Parking Design

This location is in an extremely low PTAL area of 0 and while we acknowledge that the parking capacity is within the range identified in the London Plan it is worth noting that PTAL rating makes no account of capacity for parking nearby. We understand the aim of reducing car ownership, but the fact that no parking is allowed on nearby roads means that to provide 1 parking space per dwelling is inadequate. There is insufficient capacity for the flat dwellers themselves, let alone for visitors, deliveries to the flats, tradesmen, etc. All of these will have a direct impact on the road by causing obstruction. The application would thereby conflict with policy DM30 of the Croydon Local Plan.

More importantly the parking design itself is not even viable: 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 turning space provided is extremely tight and may well result in vehicles having to reverse down the narrow, long drive. The need for such dangerous manoeuvres should not be acceptable.

3. Inadequate Information

As well as the missing Construction Logistics Plan there is no environmental impact analysis, no swept path analysis and no transport impact statement.

4. Waste Management and Environment

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.

In terms of the environment, existing mature hedging will have to be removed and there will be a significant loss of greenery to the building footprint and hard landscaping.

5. Cumulative Impact – Road Safety, Infrastructure and Environment

As we have done with all our responses to recent proposals, WURA requests that Croydon Council makes proper allowance for the cumulative impact of all the developments which have already been accepted. 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.

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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 (this proposal)
- 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 – 9 houses

Applications under appeal :

- No. 52 WR – 9 flats

The current developments have already had an impact on the Welcomes Road sewer with ongoing investigation work 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 have been pleased to see the recent refusal at nearby 11 Hermitage Road included recognition of the *“unacceptable impact on the highways network given the cumulative impact of the development. The increased pedestrian and vehicular movement ... would compromise highways safety and there be contrary to the NPPF 2019, Policy 2.8 of the London Plan 2016, DM29 and DM30 of the Croydon Local Plan”*. This current application must be considered in the same way, within in-fill of a garden of one property with four more dwellings.

The developer seems keen to give the impression these flats are appropriate for families by showing young children and prams in the graphics and including a “children’s play area”. In reality these flats are not family homes and do not contribute to meeting the strategic target of 30% of all new homes to have three or more bedrooms, contrary to Policy SP2.7 of the Croydon Local Plan. It is family homes which are needed, not more flats.

WURA requests that the application be REFUSED.

Yours sincerely

Richard Russell
Secretary

Colin Brown
Chairman

Cc (by email): - Nicola Townsend, Head of Development Management
Jan Buttinger – Councillor
Chris Philp - MP
KENDRA

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