



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 N Pearce

9th August 2021

Ref 21/03707/FUL

Dear Mr Pearce

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), with a membership of over 230 households, is responsible for the maintenance of the roads in the area and is therefore very concerned with the impact of new developments on those roads, the impact on the environment, the safety of all road users, particularly pedestrians and cyclists on these designated footpaths and the amenity of WURA members.

WURA were pleased to see that both previous applications for the same plot were refused (21/01326/FUL and 20/05606/FUL) and as we see no material improvements in key areas in the current proposal despite the reduction in the number of dwellings we request that this application also be **REFUSED**.

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 new elevation shows 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. 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 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."

This one paragraph in the refusal letter actually covers several critical issues which we believe need to be individually addressed:

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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Insufficient Access to Site : Major Safety Implications

This issue is fundamental to the site. This has not changed and cannot 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 fundamental safety issue.

We re-iterate 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 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.

This issue remains irrespective of the number of dwellings included in any application to develop the back section of this site.

Waste Management

The applicant's letter refers to a change in the bin location and, yes, it has been switched with the location of the cycle store to make it marginally nearer the new properties. However, the application also does not meet CLP Policy DM13.

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.

Poor Parking Design

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.

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The turning space provided is still extremely tight even with the removal of the nominal visitor parking space 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. This is contrary to Local Plan Policies DM27 and DM28 which seeks to preserve and maintain existing trees in development sites.*

We see no change in the application in this regard. While replanting and replacement schemes are laudable, it takes many years for the overall environment to recover from the removal of mature specimens.

In addition to the reasons given in the previous refusal, the proposal is also overlooking of its immediate neighbours, especially the supposedly private space of the rear garden of the bungalow immediately in front of the building.

In summary, WURA sees insufficient improvement in this application and requests that it be REFUSED.

Yours sincerely

Richard Russell
Secretary

Colin Brown
Chairman

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

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