



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

14th December 2020

Ref 20/05606/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 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 and the safety of all road users, particularly pedestrians and cyclists on these designated footpaths, and the amenity of WURA members.

WURA **OBJECTS** to this new application and requests that it be **REFUSED** on the following grounds:

1. Insufficient Access to Site : Major Safety Implications

Access to the site is extremely restricted. 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 all flats in a block which means that the fire appliance would need to approach using the access drive. The minimum width required for fire engine access is 3.7m and the drive is simply not that wide. 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 (see below). Any vehicles parked here will substantially block the already narrow access route.

The narrowest part of the drive past the existing property at no 2 is barely 3m 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. This would be extremely dangerous for anyone walking along the drive, for example to access the recycling area, as there is simply no space for vehicles and pedestrians to pass each other.

2. Incorrect Parking Design

Parking bays P3 and P4 are indicated as being just 2m wide when a standard bay is 2.4m. We are unsure if this is a mistake on the part of the architect or an attempt to obfuscate given the narrowness of the drive. Even 2.4m wide spaces are often insufficient for the larger SUVs that are the norm these days.

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



WELCOMES AND UPLANDS ROAD ASSOCIATION

www.wura.org.uk

We note that the proposal is that P3 is a disabled parking bay – as such 3.6 m should be allowed. The driver may need to park off the kerb and a conservative estimate of 3m would be generous. This would mean that the remain clearance for the driveway is just 2m – clearly this is unacceptable.

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.

The plan itself indicates a problem by accepting that the driveway can not be set back 1m from the boundary. A proposal of “climbing plants on fence” is rather inadequate compensation for a major limitation of the site and the climbing plants will serve to make the driveway narrower.

3. Insufficient Parking Capacity

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. Uplands Road is privately maintained and a strict no parking rule is in force. 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.

4. Inadequate Information

We note that the following reports are missing from this proposal

- Construction Logistics Plan
- Environmental impact analysis
- Swept path analysis indicating access for cars, lorries and fire engines
- Transport impact statement
- Sunlight/shade analysis
- SUDS report
- Overlooking and distances report to neighbouring properties
- Planting plan

We ask that the above reports are obtained from the developer and WURA given an opportunity to review and comment before this planning application is decided. This is particularly important with respect to the CLP with such limited access to the site. How will vehicles deliver building supplies goods during the construction phase? Management of this site is completely impractical and it is an especially noticeable omission that the application does not include a logistics or operation plan for the construction itself.

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



WELCOMES AND UPLANDS ROAD ASSOCIATION

www.wura.org.uk

5. 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, as this would block the road and severely harm the amenity of the occupants of the neighbouring properties.

The proposal therefore does not provide accessible refuse storage. The application conflicts with policy DM13.1 of the Croydon Local Plan 2018.

6. Trees and the Environment

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.

There is very little green space provided around the proposed flats and access roads. Therefore there is little hope that any planting plan can serve to soften the build form.

The future occupiers are likely to bring pressure to remove or significantly prune the two large remaining trees, increasing significantly the impact on the environment.

7. 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 alone. This represents over 110 dwellings, a 10-fold increase overall:

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. 35 UR – 6 houses
- No. 8 KC – 4 houses

Applications pending :

- No. 60 WR – 7 flats plus 2 houses
- No. 52 WR – 9 flats (new proposal following previous refusal)

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



WELCOMES AND UPLANDS ROAD ASSOCIATION

www.wura.org.uk

-
- No. 88 WR – 9 flats
 - No. 90 WR – 3 houses
 - No. 2 KC – 4 flats (this proposal)
 - No. 1 KC – 15 flats + 4 houses

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

On behalf of:

Richard Russell
Secretary

Colin Brown
Chairman

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

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