



WELCOMES & UPLANDS ROAD ASSOCIATION

www.wura.org.uk

Spatial Planning Service,
6th Floor Zone B,
Bernard Weatherill House,
8 Mint Walk,
Croydon, CR0 1EA

5th October 2018

Dear Sir,

Re: SPD2 – Impact on Kenley – September/October 2018 consultation

We refer to the draft Suburban Design Guide Supplementary Planning Document (SPD2) which is currently out for public consultation.

Specific comment re Welcomes and Uplands Roads: This Road Association (WURA), with a membership of over 200 houses, has serious concerns about the number of planning applications to construct flats in Kenley and the rest of the borough which we are currently seeing. The Council has already approved the construction of a block of 7 flats on a small sloping plot at 57 Welcomes Road in spite of a huge number of valid objections from local residents. Welcomes and Uplands Roads are privately maintained highways. Neither of these roads have pavements and Welcomes Road is only circa 4.2 m wide along the frontage of No 57 which also opens adjacent to a blind bend. Welcomes Road was never built to carry a lot of traffic let alone support large volumes of HGV traffic and has no formal load carrying sub structure. Gas leaks from the aging pipe lines under the roads are a fairly regular occurrence and the Victorian sewers are also showing signs of their age.

The approval of flats in Welcomes Road sets a worrying precedent especially when the roads in the vicinity of No 57 are very narrow. The number of flats proposed for each block is invariably too many for the site. A common feature is the limited on-site parking, lack of turning room for delivery vehicles and inadequate space for refuse bins, cycle sheds or indeed any other storage space. Street parking capacity analyses are usually required with the planning application or as a reserved matter but nothing as yet has been provided for 57 Welcomes Road.

Blocks of flats require proper management once they are occupied with a party accountable for the maintenance of their surroundings as well as the structure itself. There is need to discuss how leases will be written for the new flats in terms of car ownership and their management once they are built and occupied. As Welcomes and Uplands Roads are private Council controlled parking does not appear to be an option.

The area surrounding the roads maintained by WURA and paid for by the frontagers, is wooded and the roads themselves, which are also Public Highways, are shared spaces regularly used by walkers and their dogs, horses, and cyclists to access the Heritage Kenley Airfield and other public footpaths across the North Downs. It is an amenity we consider the Council ought to value and keep for present and future generations to enjoy. The City of London Corporation acquired the land round the airfield for the public to enjoy in perpetuity. Over development will put all this at risk. Foxes, deer and badgers abound in the area.

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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A discussion is requested with your Strategic Transport team and Development Management to agree a template for the development of housing along our two roads which balances the need for more housing whilst taking into account the factors specific to our roads mentioned above.

SPD2 Section 3.3.1 states that the planning authority's strategy for the Kenley FIZ is to:-

- maintain the leafy character of Kenley.
- regenerate the village centre with the grade II listed railway station as its heart.

There is nothing contained in the CLP or draft SPD2 to protect the leafy character of Kenley or that encourages the development of the heart of Kenley. Instead Croydon Council is encouraging the removal of street-side trees and already approving blocks of flats leading to the loss of valuable amenity for everyone.

The Area Appraisal for Kenley (SPD2 Section 3.4) does not mention several material aspects of the Kenley FIZ area and there seems to be no policy framework for dealing with them

- Several key roads within the Kenley i.e Welcomes Road, Uplands Road, Church Road, Kenley Lane, and Hayes Lane south of and including the bridge are unsafe for pedestrians.
- The limited retail facilities are located on the northern boundary of the FIZ and are too far away for many people to walk to from their homes
- Use of the 407 bus service requires pedestrians to cross the A22 which lacks a controlled crossing making the road hazardous for children, the disabled or the infirm. There is also a busy junction at this location and cars entering and exiting the Co-op's small car park.
- The road system within the FIZ features several blind bends, sharp bends and narrow pinch points that in many places do not allow two cars to pass safely. Adding to the problems are the cars parked in the road.

SPD2 exaggerates how good the access to public transport is within Kenley

The area around Kenley Station has a PTAL of just 2 – which is poor. Whilst there is a train service and two bus routes, the services are infrequent and locations accessible using this transport are few. The attached RAC report shows that car use is increasing contrary to Government policy. The era of electric cars is not likely to change this trend or the need for parking space.

The street parking stress assessment model is inaccurate

- There is no recognition of congestion caused by schools. Staff parking on nearby roads and parents parking to deliver or collect their children obstruct traffic flows.
- Railway stations are not properly accommodated for car parking. The model does not capture the impact of drivers who briefly stop to pick up or drop passengers in dangerous and/or inconsiderate places because all available nearby parking bays are fully occupied.
- The doctors surgery on Kenley Lane near Kenley Station has little or no on site parking



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- Commuters use nearby “free” on-street parking and will walk more than 400m from their car to the railway station.
- The model does not review daytime parking stress in areas impacted by commuter parking for a railway station that could be 400m away.

Single-plot development schemes will never achieve the strategic aims

Many Kenley residents are receiving unsolicited mail from various developers that want to redevelop their homes into blocks of flats. These developers seemed to be focused on single so called ‘windfall’ plots rather than trying to join up plots which might make for better design and layout.

The CLP and draft SPD2 documents impose onerous planning conditions on any development schemes of 10 or more flats. The developers seeking plots in Kenley are maximising their profits by building “up to” 9 flats per plot. This development model is leading to substandard accommodation which supposedly just about complies with the regulations for living space. The flats dominate the plot leaving inadequate space round it for parking, services and garden.

Yours faithfully,

Colin Brown
Chairman

Richard Russell
Secretary

Dr Marion McKelvie
Committee Member (Planning)



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