



WELCOMES & UPLANDS ROAD ASSOCIATION

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Mr Pete Smith,
Development Management,
Place Department, 6th Floor, Zone A/B,
Bernard Weatherill House,
8 Mint Walk,
Croydon CR0 1EA

28th December 2018

**Re: Planning Application by Aventier to build a block of 9 flats at
1 Kearton Close, Kenley CR8 5EN No 18/05877/FUL and our draft local plan.**

Dear Mr Smith,

We refer to the above planning application which is in breach of several planning policies as set out in the Local Plan 2018. These are listed at the end of this letter.

As you know from our meeting on 27th November 2018 when you came to see us in Kenley we passed on a draft plan for delivering extra homes here which we considered sustainable in the context of the privately maintained roads we look after. It is appreciated that this plan may not be regarded as a formal regeneration plan but is was written in the spirit of trying to be helpful in terms of delivering extra homes without harming the unique distinctiveness of this part of Kenley. A digital copy of the plan was sent to Julia Dawe as agreed on 27th November 2018 and we await a response of some kind.

The draft plan was put forward in the hope that planning applications of the templated kind submitted to you by Aventier would be stopped or at least a moratorium put on them before any irreversible harm was done to the area and to allow our draft plan to be properly considered.

Instead we find that 9 flats for 120 Hayes Lane Kenley (albeit fronting a Public road) have been approved recently and that the pre application plan for 1 Kearton Close (9 more flats) was entirely supported by the Council planners save for some technical considerations.

It is not known if our more sympathetic view of the flat conversion for 36 Welcomes Road was noted by you but we did not signal any serious objection to the flats now approved for this site. The plot is near the Station and has plenty of room for parking on site although even then the Planning Committee did not insist on the more generous parking ratio we recommended. On the other hand we remain very concerned about the flats approved for 57 Welcomes Road (used by developers as a precedent) where there is limited space around the flats. The plot also fronts the narrowest section of Welcomes Road. No proper consideration seems to have been given to refuse collection and the numerous bins we assume are needed for the 7 flats being built here. We appreciate that this development went through on appeal meaning that it cannot even be contested through the Local Authority Ombudsman to whom we lodged a complaint. These particular flats will be harmful to the neighbours and threaten the viability of the road from overspill parking.

We consider that we have offered a sensible and pragmatic template for future developments along our roads bearing in mind that they are privately maintained and that the Road Committee are responsible for seeing that they remain open for all kinds of traffic including the numerous cyclists the planned bike sheds imply we are likely to see using our roads.

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Chairman	Colin Brown	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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Apart from the road safety considerations we do not understand why the Council seem uninterested (in spite of the sentiments expressed in the Croydon Local Plan) in conserving the unique amenities offered by this part of Kenley for the public at large to enjoy . We refer of course to the Kenley Heritage Airfield and the public land around it which is accessed via Welcomes Road and Hayes Lane.

The draft local plan for our roads we submitted to you in November argued the case for according Green Grid status to Welcomes and Uplands Roads. We believe there is nothing to stop the Council according Green Grid status to these roads immediately and thus to make sure future flatted developments (if we must have them at all) along the same roads have a parking ratio of 1.5 per unit plus a disabled space and a visitor space. The number of units in each block would then be reduced accordingly and land banks and developers would need to take this into account when offering options to buy property in this area.

In regard to the breaches of the Croydon Local Plan we list these below and in our view these should be sufficient to stop the application for 9 flats in Kearton Close.

11.122 says developments must

"respect existing residential character and local distinctiveness."

The proposed development for flats does not do this but is more likely to harm the area.

Strategic Objective 5

"...to ensure that high quality new development both integrates, respects and enhances the borough's natural environment and built heritage.'

The construction of flats will as argued above have the opposite effect particularly when there is no plan in place to limit the number of sites which could be given over to flatted developments or the number of on site parking spaces allocated.

Strategic Objective 7

... to conserve and create spaces and buildings that foster safe, healthy and cohesive communities.

Shutting people up in small flats with car overspill into the road is unlikely to foster safer, healthier and cohesive communities. The location of the entrance to this property is likely to cause congestion in the area with all that implies. The numerous waste bins the flats will generate is a legitimate cause for concern and will be harmful to the street scene.

Strategic Objective 8

...Improve accessibility, connectivity, sustainability and ease of movement to, from and within the borough.

We have argued for green grid status above and the need to respect Welcomes and Uplands Roads as the gateway to the Downs and the Kenley Heritage Airfield. Planners should look at the web sites for the Airfield and the wildlife on the neighbouring downlands to understand why the roads leading to it should be granted gateway status.

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The Croydon Local Plan stipulates recommendations for parking in table 10.1; is as per the London Plan.

The London Plan Table for parking stipulates — "for a 3 bed property up to 1.5 parking spaces" but then goes on to suggest "In outer London areas with low PTAL (public transport availability levels) (generally PTALs 0-1), boroughs should consider higher levels of provision, especially to address 'overspill' parking pressures."

This scheme only makes allowance for 9 vehicles, one for each flat, and as there is no nearby public transport it is safe to assume there will be overspill on to the adjacent roads. We have argued for some time for 1.5 places per unit plus a disabled space and visitor parking.

The proposal ignores Local Plan (LP) point **SP2.2** which says
"...Concentrating development in the places with the most capacity to accommodate new homes whilst respecting the local distinctiveness of the places and protecting the Borough's physical, natural and historic environment, whilst recognising that places change and in particular suburbs will sustainably grow;"

It seems to us that there are many other urban sites still available for development or new projects that are not yet built which need to be completed before allowing harm to the natural and historical environment characterised by this part of Kenley. A moratorium on flat building here should be put in place immediately.

Conclusion

We urge that the application is refused or the decision at least postponed until our recommendations for the future development of this specific area (the 'WURA Zone') have been properly evaluated.

We consider we have set out above legitimate concerns about the relentless and random approval of flatted developments here whilst offering a template for the future development of our specific area in terms of the draft local plan you already have. So far there is no indication anyone is listening at Planning Committee level and even our modest recommendation for more parking space on 36 Welcomes Road was casually set aside by the Committee.

The planning process is broken on current evidence given that the views of tax paying constituents are routinely ignored. Our draft local plan, which is focused on saving an important local amenity for the enjoyment of the public at large, we feel deserves urgent consideration and a halt called to flatted developments on small plots with insufficient off street parking until a plan is put in place for the future development of the 'WURA zone'.

The planning application for 9 flats on 1 Kearton Close, Kenley, No 18/05877/FUL should be refused.

Yours sincerely

Colin Brown
Chairman

Richard Russell
Secretary

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