



Mr Pete Smith
Head of Development Management
Planning and Strategic Transport
Place Department, 6th Floor, Zone A
Bernard Weatherill House
8 Mint Walk
Croydon
CRO 1EA

2nd April 2019

Ref 18/05006/FUL

Dear Mr Smith

Re: Proposed development at 32 Welcomes Road CR8 5HD : Demolition of existing building: erection of a three storey building comprising 9 units and formation of associated vehicular access and provision of 9 off-street parking spaces, cycle storage and refuse store.

Sadly WURA have found the need within a few weeks to write again to request that a planning application be **REFUSED**. In addition, we continue to request that a moratorium on similar proposals is imposed for a defined period while the cumulative impact of so many large developments in a small area is properly assessed.

1. Poor Quality Proposal

The aims of this proposal given the topography of the site are simply staggering. 32 Welcomes Road is one of the steeper plots on the road with the current bungalow and its neighbours sitting high above street level with a steep drive to the front. The proposal does not take this limitation sufficiently into account.

In an attempt to make it look like the proposed building remains in scale with its neighbours – which fails, as the roof height will be almost twice the height of the existing property at no 30 – the construction will require excavation of almost the entire plot. This can not be achieved without damage to the surroundings, including the trees and neighbouring properties. There doesn't appear to be any reference to retaining walls and with the car parking area being established at a significantly lower height than the neighbouring ground it is difficult to see how this can be safely achieved.

Much effort has been made to provide plans for tree protection and construction management, but the sheer engineering required and management of the pre-build excavation does not appear to be addressed at all. There is no plan to cover the initial landscaping work and its impact. Welcomes Road is known to be of weak structure and prone to gas pipe damage; the heavy vehicles required particularly during the excavation stage may have serious repercussions.

The Construction Management Plan shows a 'site delivery car' which, if taken to scale, is nowhere near the size of typical construction vehicles and also shows the layout once excavation has taken place. Large construction vehicles already have difficulty turning into entrances of developments on Welcomes Road due to the narrowness of the road and this is not thought about.

The plan states that a holding area may be used for deliveries without any reference to where that might be, which given the narrowness of the roads in the surrounding area will be a problem in its own right. The plan also states that there will be no parking available on site for site personnel, glossing over the fact that parking is not allowed on Welcomes Road.

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



2. Overdevelopment

WURA fully recognise the need for more housing and have been active in trying to engage constructively with the Strategic Planning, Development Management and Transport Departments at Croydon Council. However, this is yet another proposal which must be considered within context with the cumulative effect of two developments already underway and one further potential development of comparable scale adding 28 additional dwellings within less than 600m. A ratio exceeding 7:1 on each plot is simply not sustainable for the area. The increase in population from such developments is not supported by the local infrastructure and further proposals only serve to make it worse.

The Strategic Planning and Development Management Departments have acknowledged “that the capacity of Welcomes Road to provide for on street parking is very limited indeed – which in itself limits the capacity of sites to deliver a large number of units, especially if the sites concerned are relatively small in size.” 32 Welcomes Road is one of the smaller plots compared with others on the road which would be more appropriate for the scale of development being proposed.

3. Traffic and Highways

To enable the Croydon Planning team to properly understand the specific and urgent parking problems on Welcomes Road WURA commissioned their own parking Stress Survey for the development site at 32 Welcomes Road, attached. This should be taken into account in its own right as part of the evaluation of the proposal.

There are other blocks of flats in the area as shown in the table below

Flats	Location	Ratio of on-site parking spaces to flats	Actual level of car ownership (approx. average)
Yateley Court	Bottom of Hayes Lane	1:1	1.5 cars per flat
Waterborne Way (2 blocks)	Godstone Road near waterworks	1:1	Nearly 2 cars per flat

Allowing one parking place per flat will result in overflow parking and there is no capacity at all for visitor parking.

WURA continue to ask that the Croydon Planning team recognise the specific parking issues of multi-dwelling development sites on Welcomes and impose a requirement on the Planning Committee to enforce a higher ratio than 1:1. Sadly the provision of such spaces would have a hugely detrimental impact on the trees and proposed planting; a key indicator that the scale of development is inappropriate for the size of the plot..

Gradients on the local roads are steep and unfortunately this means a high ratio of SUV-style vehicles, larger than average and less maneuverable. The parking arrangements shown on the plan are extremely tight. Looking at the Swept Curve Analysis in detail, the document implies the use of a car of width 1.715m and no other cars parked in the spaces. A current Mini is more than 1.715m wide and even a Smart car is 1.663m. The angles of the cars shown indicate that multiple maneuvers have to be made to be able to park.



4. Waste Management

The plan includes a refuse store and appears to propose the use of 1100l bins for general waste as well as the standard 240l bins for recycling. How these will be made accessible to the road for collection is not shown. Bins cannot be put out on Welcomes Road itself and there is no space allowed in the proposed landscaping.

The refuse store itself seems to small for the number of flats given that there are three categories of waste to be stored. The proposal does not meet the requirements of the Croydon Local Plan Policy DM13.1

There are no 1100l bins currently on the road. Can the recycling vehicles currently covering this route cope with them?

5. Overlooking

As stated under Section 1, the roof height will be almost twice the height of the existing property at no 30. The existing bungalows on this plot and its immediate neighbours already sit high above street level. Adding to this height will result in a property which completely dominates both the road and the surrounding properties.

6. Detrimental impact on trees

Despite the good intentions of the Tree Protection Plan, it is difficult to see how the mature trees will survive the level of excavation and construction work required. The plot has an impressive stand of mature yew trees at the front and a mixed copse to the rear, both of which includes Category A trees. The excavation and construction work will have an inevitable detrimental impact on the root system of these trees which may well result in them having to be removed before their reasonable life expectancy.

The Croydon Local Plan describes Kenley as whole as having a “strong link between the green infrastructure and the built environment. This creates a feeling of spaciousness or openness which [sic] can be seen in the layout of the built environment”. In addition, “green areas of planting on the opposite side are all characteristic features” and “mature trees located within front gardens of residential developments provide extensive tree canopy cover, contributing to the impression of tree lined streets” (paras 11.128 – 11.132). Everything that can be done should be done to retain these characteristic features and the impact of this proposal will have a negative effect.

7. Not in keeping with the area

As with other recent proposals, the application is not in keeping with the area. The Croydon Local Plan states developments should respect “existing residential character and local distinctiveness” (para 11.122). Such character cannot be maintained by developments such as this, especially when considered within the context of the cumulative effect of the other developments of comparable scale already underway or proposed within 600m.



8. Contrary to the aims of Croydon SPD2 and other local plans

Para 6.58 of the Croydon Local Plan states there should be “Evolution without significant change of area’s character” and para 6.59 states “new development should not adversely impact on the predominant character

”. Increasing from 1 property to 9 on a single plot, especially when taken in context of the other developments within 500m, will have a significant impact on the area’s character.

Kenley is identified in the Croydon Local Plan as an area which should have “enhanced Green Grid links for walking and cycling” (para 11.121). This theme is expanded in para 11.126 “Links to existing green spaces and the extensive Green Grid network of paths from the residential areas will be improved and added to where possible, to provide more opportunities for cycling and walking”. Jeopardising pedestrian safety as discussed above is incompatible with this vision.

Kenley and in particular Welcomes Road is a gateway to the designated Metropolitan Greenbelt. Welcomes Road leads directly to Kenley Airfield which is an area of significant national heritage. Intensification to the levels proposed should not be permitted in close proximity to the Greenbelt. There must be a buffer zone where the intensification transitions between open greenbelt and urban sprawl and Welcomes Road comprises that buffer zone.

The Monitoring Report of May 2018 states that Croydon believes it can meet the ambitious targets set for new housing set by the London Plan and National Planning Policy while still being able “to protect less appropriate sites from development”. 32 Welcomes Road represents a site which is “less appropriate”, especially as there are more appropriate sites within the immediate locale.

For the above reasons, WURA requests that the application be **REFUSED** and a moratorium imposed for a defined period while the cumulative impact of so many large developments in a small area is properly assessed.

Yours sincerely

Marion McKelvie
For Secretary

Colin Brown
Chairman

Cc (by email): - Sharon Mitchell - Planning Technical Support Team
Steve O’Connell – Councillor
Jan Buttinger – Councillor
Chris Philp - MP
KENDRA