



WELCOMES AND UPLANDS ROAD ASSOCIATION

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

Attention: Ms Violet Dixon, Case Officer

6th July 2020

Ref 19/05954/FUL

Dear Ms Dixon

Re: Proposed development at 37 Welcomes Road Kenley CR8 5HA : Demolition of existing dwelling, erection of a two/three storey building to provide 9 residential units, with associated landscaped areas including parking, cycle and refuse storage.

As always, WURA are concerned with the impact on the roads in the area, the impact on the environment and the safety of all road users, particularly pedestrians and cyclists on Welcomes Road itself, a designated footpath. Focusing purely on these elements, WURA requests that this application be REFUSED on the following grounds:

1. Poor Quality Proposal

The disregard for accuracy and selective lack of detail in this application is staggering. After early complaints were raised the developer has submitted some "corrected" plans, but still continues to ignore many serious errors and inconsistencies and also fails to provide sufficient detail in many areas.

The original application was of such poor quality it should probably never have been validated for submission in the first place. This objection is based on the amended documents (documents with a published date of 24th June on the Croydon Planning Register) where token presentational changes have been made. At least the plans now include the correct address.

No Logistics Plan

An obvious example of poor quality is the complete lack of Logistics Plan for the construction phase.

No Drainage Details

There appears to be a Flood Risk Assessment (inaccessible on the Croydon Planning website at the time of writing) but no detailed consideration of drainage requirements, already an acknowledged problem on Welcomes Road.

No Proper Streetview Elevation

There is no clear statement of the elevations with respect to the neighbouring bungalows. In the relevant diagrams the neighbouring properties are drawn as schematic blocks which do not reflect the properties themselves.

Incorrect Transport Information

An obvious example of inaccurate information is in the content of the Transport Statement, which contains the fundamental incorrect assumption that parking is allowed on Welcomes Road. Apart

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Secretary	Richard Russell		12 Zig Zag Road	Kenley	CR8 5HA	Tel 020 8668 7293
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from the fact that parking is not allowed (which is clearly visible to anyone either visiting the road or researching it on the internet), it even suggests that the road is wide enough to sustain parking on one side without causing obstruction. Perhaps they should speak to the refuse collection company department. Perhaps a proper Risk Assessment could be carried out by the Council Highways Department?

Misleading Environmental Information

In addition, the Ecology Report is completely misleading with respect to wildlife, and probably incorrect. Badgers are seen every night in the surrounding gardens, bats regularly fly around neighbouring properties. They may not actually have setts or roost within the site boundary, but they are certainly nearby and their environment will be significantly impacted by the creation of a larger building with significantly more hard landscaping and taller boundaries. The suggestion to incorporate bat tubes into the building makes no allowance for the fact that the bats will be long gone due to the construction phase. To say that “birds **may** be using the trees ... for nesting” is completely disingenuous.

2. Road Safety and Insufficient Parking Capacity

The Transport Statement states the “the proposed development seeks to provide car parking at a rate of 78%” yet also notes that car ownership in Kenley is over 83% of households with 38% of those (ie 46% of properties) having multiple cars. Accepting that flat dwellers would probably not be in the 10% of the 83% owning 3 cars or more, it is still a virtual certainty that people purchasing flats priced at £300k-£400k would own at least one vehicle.

Accepting that there is no parking on Welcomes Road, there is insufficient capacity for the flat dwellers themselves, with no account 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 CLP and Policy 6.13 of the 2016 London Plan.

There are some diagrams at the end of the Transport Statement showing swept analysis for cars parking in the space provided. It is clear even from the diagrams that the paths are not actually viable – vehicles need to penetrate hedges and shrubs and encroach on the other parking spaces (bay 5). If a vehicle was in that space then the manoeuvring fails. Vehicles also need to get very close to the garage doors (bays 1 and 2) to achieve the swept paths, which is clearly unsafe.

There is no provision for electrical vehicle charging.

3. Not in keeping with the area

The street scene at this part of Welcomes Road is a pleasant line of matching bungalows built on the St Winifreds playing fields. Part of the deeds include the need to maintain an open looking environment across all these properties. Indeed, it is our understanding that the deeds, written as recently as the 1970s, includes the statement that “should not contain more than one residence each”. Presumably this would be an issue for the developer rather than the Council planning department but surely something to be aware of.

The artist’s impression on p27 shows how dominating of the street scene this proposal will be. View this image against images 3 & 4 on pages 4 of the report of the neighbouring properties. (Note that image 3 on page 6 is not even the property marked on their plan but further along the road, yet another inaccuracy).

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The proposal would therefore fail to integrate successfully within the immediate, contrary to Policies 7.4 and 7.6 of the London Plan (consolidated with alterations since 2011) and Policies SP4 and DM10 of the CLP and the Suburban Design Guide SPD 2019.

The statement includes the intention to retain the design elements on the Croham Valley Road scheme. This shows a lack of sympathy for the actual surroundings – “we can just bung in the same solution irrespective of location”. None of the images used for various architectural features are actually from the neighbouring properties.

The overall design and layout of this application goes against many of the policies stated in the CLP and the SPD2. Para 6.58 of the CLP 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. Policy SP1.2(a) states “Development proposals should respond to and enhance local character, the heritage assets and identity of the Places of Croydon”. Why were these policies even stated if they are just being completely ignored?

This application represents another attempt to capitalise on an inappropriate “windfall” site, contrary to the Examiner’s response to the Draft London Plan. Applications such as this one go directly against the Examiner’s guidance, specifically in terms of Windfall targets and the approach to existing special character. At the very least this application should be held in abeyance until the details of the London Plan are finalised and incorporated appropriately into the CLP. Given the current complete contradiction between the Examiners and this application, it should really be rejected.

4. Protection of 1.5m Pedestrian Buffer

There is no provision for the 1.5m pedestrian buffer zone required by Section 3.6 of the latest SPD2.

5. Lack of Accessibility

Although much is made of accessibility to one particular flat, there is no lift and the space nominated for disabled use is the same size as all the others. No disabled person would be able to get in or out of a car parked there when another car is parked in the adjacent spot.

The access along the side of the property is extremely narrow (it appears from the drawings to be 1m) – hardly space enough for moving bins, people pushing bicycles or pushchairs and likely impassable for wheelchair users.

The clearance for removing the cycles from the storage area is just 1m, clearly insufficient even without the adjacent hedge which would occupy part of the space.

6. Waste Management

There is no provision for making recycling container accessible for collection and in fact it looks doubtful, given the lack of detail, that sufficient capacity for recycling bins has been provided. The proposal does not meet the requirements of the CLP Policy DM13.1.



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7. Cumulative Impact

WURA cannot let another application go by without yet another reference to the cumulative impact on the road. Now that three constructions are already underway at various stages of development, we are already seeing obstructions. We are yet to see the impact of these properties once they are occupied. Any impact analysis is purely theoretical.

Croydon Council must take into account the cumulative impact of so many multiple dwelling applications on a small area of Kenley. We are now looking at a total of 7 construction sites on Welcomes Road alone within an approximately 800m stretch of road averaging 5m in width and a shared space with walkers. Many more developments are in place within the immediate area of this current application.

The local health care provision is already overwhelmed before the new properties are even occupied. (They always say it will follow)

WURA requests that the application be REFUSED and again request that a moratorium is imposed for a defined period while the cumulative impact of so many large developments in a such a small area can be properly assessed.

Yours sincerely

Richard Russell
Secretary

Colin Brown
Chairman

Cc (by email): - Nicola Townsend, Head of Development Management
Heather Cheesbrough, Director of Planning and Strategic Transport
Steve O'Connell – Councillor
Jan Buttinger – Councillor
Chris Philp - MP
KENDRA