



WELCOMES & UPLANDS ROAD ASSOCIATION

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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

7th March 2019

Ref 19/00548/FUL

Dear Mr Smith

Re: Proposed development at 42 Welcomes Road CR8 5HD of a three storey building with accommodation in the roof space (comprising 6 x two bedroom and 1 x three bedroom) and 2 x four bedroom, semi-detached houses, with associated access, amenity space, landscaping, alterations to land levels and off street parking.

Welcomes Road is a public highway maintained at the expense of its frontagers and a designated footpath, maintained and managed by the Welcomes and Uplands Road Association (WURA). It is frequently used by walkers to access Kenley Common and Kenley Airfield as well as by the local residents.

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, the WURA committee and our membership are very concerned about the impact this proposed development will have on the neighbourhood and therefore we are writing yet again to request that a planning application be **REFUSED**, for the specific reasons stated below.

1. Overdevelopment

Although it could be argued that this proposal on its own represents a major overdevelopment of the site, it must be considered within context with the cumulative effect of two other developments of comparable scale already underway adding 20 additional dwellings within 500m. 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.” 42 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.

The developer has included areas optimistically labelled ‘allotment plots’ for each flat in the main block – each one being less than half a car-size in area. This shows the scale of the building and associated hard-landscaping compared to the size of the overall plot. The size of the plot is more appropriate to fewer properties, either as houses or a smaller block of flats, but is not capable of supporting the proposal.

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
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2. Traffic and Highways

There are multiple elements to our objection in this category. WURA find it difficult to accept that a proper risk assessment of the knock-on effect of this and other recent multiple-occupancy developments in the immediate locale has been carried out.

2.1 Parking and Access

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.” Welcomes Road is a designated footpath and as such it is not lawful to park on it except briefly to deliver something for example.

The flats have a total of 7 parking spaces available despite them being 2 or 3 bedroom apartments. Typically such flat sizes will mean a minimum of 14 adults plus children. There is no capacity for visitor parking. Welcomes Road is not a fully urban area with excellent public transport links; the reality is that car ownership is more comparable to the Surrey average than the central Croydon average. These properties appear to be aimed at families, making it even more likely that occupants will have multiple vehicles.

WURA has consistently proposed that new multiple occupancy developments should have a capacity of at least 1.5 cars per property, ideally plus visitor space and disabled space. This would mean a total of 12 spaces really should be provided for the 7 flats. Sadly the provision of such spaces would have a hugely detrimental impact on the trees and proposed planting; another indicator that the scale of development is inappropriate for the size of the plot.

WURA acknowledge the Council’s suggestions for the restriction of parking but such approaches are untested in the area and it remains to be seen whether they will be effective. There is no option for Council administered Controlled Parking Zones. Using third-party parking controllers would lead to severe disharmony between those residents with reasonable drive space and those in these new developments with inadequate capacity.

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 with no swept curve analysis; certainly there is very little space to open doors. It is also difficult to see how some of the vehicles will be able to turn round to approach the entrance to the road safely.

Any overspill parking, which will happen either within the plot or out on to Welcomes Road, will severely impact access for recycling and emergency vehicles.

At the very least, a moratorium on such high-density construction should be put in place until it is demonstrated whether the current level of parking capacity is viable.

2.2 Pedestrian Safety

The flats appear to be intended for young families, given the proposed play area. Welcomes Road is not a safe road for pedestrians at the best of times and certainly not for those with pushchairs and toddlers. It is used by non-residents seeking a quick route to Kenley Station and sadly not all drivers adhere to speed limits or even appear to be aware that there are no pavements for pedestrians.

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In front of Kenley Station, cars regularly mount the pavement to pass each other and access to the Caterham-bound platform for pushchairs requires use of the Hayes Lane bridge with an extremely narrow pavement and poor sight lines. The Council's laudable aim is to reduce the dependency on cars, but the reality of the area is that even to get children to the nearest school it is far safer to drive than to walk.

WURA recognise that a Kenley Community Plan has been proposed, but there is no scope for road safety improvements within that plan. As the current developments take place, even if the increase in car numbers is held to a minimum, the number of pedestrians and potentially cyclists (although given the steepness of the roads and lack of cycling lanes, cycling is only an option for the keenest) will be substantially increased, making it more and more likely that a serious incident will occur.

3. Not in keeping with the area

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).

The 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 two other developments of comparable scale already underway within 500m.

4. 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". 42 Welcomes Road represents a site which is "less appropriate", especially as there are more appropriate sites within the immediate locale.

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5. Recycling capacity

The plan shows a bin store for 9 bins, one per flat/house. Currently Croydon requires a minimum of three wheelie bins per property. The space provided is not only clearly inadequate, it is also in contravention of the policy DM13 in the Croydon Local Plan, as it is not "Sensitively integrated" nor "within the building envelope". It is not even "integrated within the landscape covered facilities that are located behind the building line where they will not be visually intrusive". Having to squeeze in insufficient facilities is yet another indicator of overdevelopment for the size of the site.

6. Overlooking

The semi-detached houses to the rear of the plot have the living area on the 1st floor, with bedrooms on the ground floor. Presumably this is so that they are not looking straight at the flats in front of them, although this will result in them overlooking the existing properties to either side.

Some the flats have balconies which will directly overlook existing properties to either side resulting in an unreasonable lack of privacy. In addition, the two houses project beyond the rear building line of the existing houses leading to both an undue loss of light and interference with privacy of their occupants.

For the above reasons, WURA requests that the application be **REFUSED** and, preferably, 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

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