



WELCOMES & 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

11th February 2020

Ref 19/05485/FUL

Dear Sir or Madam

Re: Proposed development at 52 Welcomes Road CR8 5HD : Demolition of existing dwelling and erection of building to provide 9 residential units with associated landscaping, parking, vehicular access, cycle and refuse storage.

The decisions which have gone before and the similarity of the basis of the current application means that local residents are suffering from an “objection fatigue” which results in a lowering of the number of individual objections raised. It is important, however, that the opinions of WURA and its members are fully represented so we are writing to object in the strongest possible terms for yet another overdevelopment of a site on Welcomes Road.

WURA requests that this application be REFUSED on a number of grounds:

Planning decisions in light of the Examiners response to the Draft London Plan

WURA believes that it is imperative that Croydon Council take account of the input from the Examiners of the Draft London Plan. While fully recognising that details such as final target numbers are still being discussed, as indicated by Mr Scott during last week’s Council Cabinet Meeting, 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 Croydon Local Plan. Given the current complete contradiction between the Examiners and this application, it should really be rejected.

There is no debate about whether Kenley and Welcomes Road in particular have special character. Welcomes Road, a designated footpath, was identified by Croydon as part of the Green Grid, giving access to Kenley Common and the Heritage site at the aerodrome. The cumulative impact of developing (let alone over developing) individually relatively small sites MUST be considered - “these include the consequences for the special character of an area including green cover and tree canopies, for health and social infrastructure and for transport”, as specifically stated by the Examiners of the Draft London Plan.

Recent Government report, Living with Beauty, states the importance of a green environment and specifically, in Policy Proposition 6, that non-negotiable infrastructure includes green infrastructure. This is not only for maintaining a pleasant environment for the residents, but more fundamentally is part of eradicating the UK’s net carbon contribution. The green environment in areas such as Welcomes Road, with its mature trees, can not be easily re-instated once destroyed by over-development.

It appears that recent planning decisions for the WURA area have been made purely to hit targets which independent reviewers have labelled as unrealistic and which have ridden roughshod over any consideration of the character of the local 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



Cumulative Impact – Road Safety, Infrastructure and Environment

Croydon Council makes no allowance for the cumulative impact on community infrastructure and road safety, even if we ignore the character of the area. We emphasise again that this application MUST be taken in its current context, which means we now have the following within a mere 600m:

- No. 32 – 9 flats
- No. 36 – initially 7, now 8 flats
- No. 42 – 7 flats plus 2 houses
- No. 52 – 9 flats
- No. 56 – 9 flats
- No. 57 – 7 flats
- No. 60 – 7 flats plus 2 houses

This represents 60 dwellings, generally aimed at families, where there were originally just 7 and only concentrates on those developments within a short distance of each other. We have not even included those nearby, such as the new proposal for 8 family houses at no. 10 WR and further houses on Uplands Road. The cumulative impact on this part of the road, which is actually one of the narrower sections, needs to be considered, both during the development period and when the properties are fully occupied.

We have raised again and again the impact of the additional vehicles such developments will bring. This particular application did not even provide an attempted analysis of the impact. Welcomes Road is narrow and is actually a designated footpath where no parking is permitted or even possible on the road or verges.

As with the other proposals in the area, the developer is targeting the majority of the flats at family residents, by including play areas and 2x 3-bed flats. Such families need to get their children safely to school. They will not be walking down the road to get the train or even the bus, it is too hazardous. 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.

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.

Gradients on the local roads are steep and unfortunately this means a high ratio of SUV-style vehicles, larger than average and less maneuverable. It also means there are very few cyclists – the planning department employees who visited the area to meet WURA commented on how steep the roads are.

All this means that we can safely assume that virtually all 60 of the new dwellings will have at least one car which they will be using on a daily basis, significantly increasing the already high risk for all users of Welcomes Road.

Overdevelopment and Overlooking

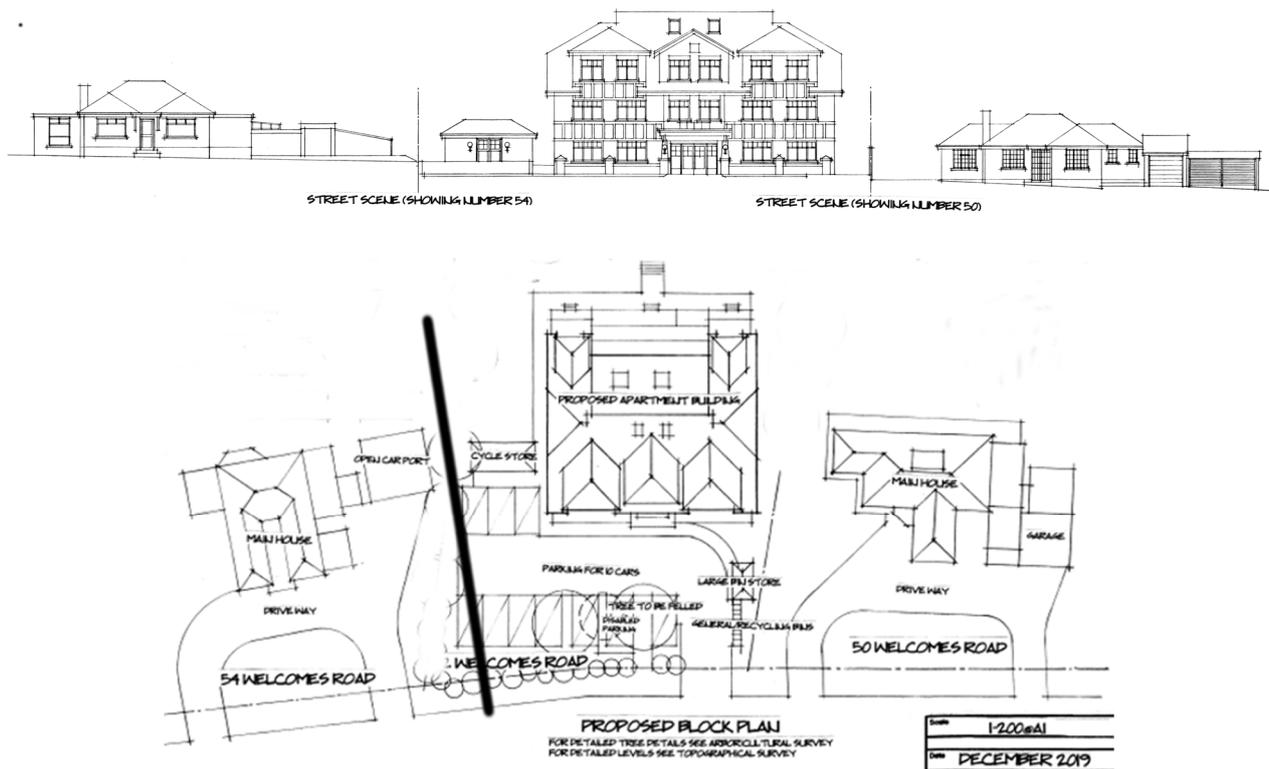
The scale of this proposal in terms of its dominance of the surroundings is staggering and amply demonstrated by the architect's own submissions. The elevation, showing the bungalows on both sides, does not give the full impact, because the angles of the plot means that no. 54 (on the left in the image below) actually appears much closer from the road than the impression given by the elevation cross-section:

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Second and third floor balconies which will overlook neighbours on both sides as they will be higher than any practical tree line on the boundary. This contravenes DM10.6 of the Croydon Local Plan, which indicates plans should ensure that “The amenity of the occupiers of adjoining buildings are protected” and that “They do not result in direct overlooking of private outdoor space”.

The cramped access around the property is a typical symptom of over development. Access from the front to the cycle store, if the three parking spaces in front of it are occupied. There is no analysis of how car users can actually manoeuvre safely in the given space. Maintaining the existing access may lessen the impact on the road but does not cater for the increased number of vehicles which will be using it.

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

On behalf of:

Richard Russell
Secretary

Colin Brown
Chairman

Cc (by email): - Pete Smith, Head of Development Management
Steve O’Connell – Councillor
Jan Buttinger – Councillor
Chris Philp - MP
KENDRA

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