



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

Attention Pete Smith, Development Management

Copy: Steve O'Connell, Councillor
Jan Buttinger, Councillor
Chris Philp - MP
Planning Kendra

10th July 2019

Ref 19/00412/FUL

Dear Sir or Madam

Re: Proposed development at 56 Welcomes Road CR8 5HD : Demolition of existing bungalow and erection of a three storey building (including accommodation in the roof) to provide 9 units including associated landscaping, parking, access and cycle/refuse stores.

This is another application which WURA strongly requests be **REFUSED**. It emphasises the need for a moratorium on similar proposals imposed for a defined period while the cumulative impact of so many large developments in a small area is properly assessed. Within a mere 600m in Welcomes Road we already have the following increase in properties to contend with:

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

The current application for No. 56 proposes to add a further 9. This is an increase from 5 properties to 39, all with extremely limited parking and significant impact on the local outdoor amenity and green surroundings, part of the “enhanced Green Grid” of the Croydon Local Plan.

Surely the impact of such an increase must be assessed before allowing further development. The development approval process requires that traffic impact is accounted for – there is no way that this can currently be taken into consideration with these applications. In addition, there is a lack of consideration of the impact on the local infrastructure, such as GPs (already oversubscribed) and schools.

As previously stated, 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. There are larger plots in the surrounding area more appropriate for this level of development. Plots such as no. 56 WR should be limited to a maximum of 4 flats to ensure adequate parking provision and retention of the surrounding green environment.

The above, of course, refers to the cumulative effect of the recent gaggle of proposals. WURA's objections to the previous proposals covering overdevelopment, the impact of increased traffic levels in an area with a very poor PTAL rating (1b) and inadequate parking can be re-iterated for this application too.

However, in addition to those well-exercised but apparently ignored objections, there are a range of specific reasons for WURA to object to this current proposal, 19/00412/FUL:

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



1. Lack of Accessibility

This particular application fails on several fronts for accessibility, as required by the Croydon Planning Team for previous applications. There is no lift, no disabled parking space and no step-free access.

2. Overlooking

The frontage design is extremely imposing and at three stories substantially taller than the surrounding properties. The submitted plans, although with impressive computer generated graphics, significantly lack detail on the height of the building compared with its neighbours and conspicuously lack any roofline projections.

The floors with large windows above the neighbouring properties mean that those neighbours lose any sense of privacy in their gardens.

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”.

3. Inadequate Parking

As with the previous applications, there is inadequate parking for this proposal too. However, it appears to be even worse here given the number of 3-bedroom flats. Occupants are highly unlikely to have only one car and no visitors. Welcomes Road is narrow and is actually a designated footpath where no parking is permitted or even possible on the road or verges. WURA will be erecting signage to enforce this rule.

One of the proposed parking spaces, according to the site plan, is immediately in front of ground floor windows. The impressive CGI graphics happen to show only one car in each view and none immediately in front of the building. If occupants own the vehicle shown (Range Rover), they won't actually be able to get in or out of their cars when parked, as the space is too tight. This comment may be considered to be frivolous, but there is a serious side to the graphics as they demonstrate the target audience for the development – SUV-owning families.

At the risk of being repetitive, WURA continue to ask that the Croydon Planning team recognise the specific parking issues of multi-dwelling development sites on Welcomes Road and impose a requirement on the Planning Committee to enforce a higher ratio than 1:1. Sadly, of course, the provision of such spaces would have a hugely detrimental impact on the trees and surrounding planting; a key indicator that the scale of development is inappropriate for the size of the plot. The developer at no 36, where there is more capacity for parking space, has already acknowledged the foreseeable problem and proposes to increase the number of planned spaces.

4. Waste Management

The plan does not provide adequate space for recycling facilities 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

The implication in the plan is that large multi-property bins will be used. The refuse store itself seems to be small for the number of flats given that there are three categories of waste to be stored. There are no 1100l bins currently on the road. Can the recycling vehicles currently covering this route cope with them? Is there adequate space for them to be emptied given the narrowness of Welcomes Road?



5. Protection of 1.5m Pedestrian Buffer

The proposal appears to include the 1.5m pedestrian buffer zone required by Section 3.6 of the latest SPD2, however this simply reflects the existing grass verge at the property. What will be done to ensure that this area does not become a parking spot for overflow vehicles, which would increase the risk to pedestrians and cyclists on Welcomes Road?

6. Detrimental impact on trees

The Arboricultural Method Statement proposes the removal of a significant number of trees from the property, including established yew trees and other mature specimens. 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.

In addition, with the limited parking, there is highly likely to be future requests from the occupants for additional capacity. A landscaping condition for at least 5 years should be imposed.

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

Many of the policies stated in the Croydon Local Plan and the SPD2 are being completely ignored. 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. Policy SP1.2(a) states “Development proposals should respond to and enhance local character, the heritage assets and identity of the Places of Croydon”.

None of these aims are being applied in the current proposal.

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

Yours faithfully

Richard Russell
Secretary

Colin Brown
Chairman

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