



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

FAO Case Officer: Hayley Crabb

8th October 2022

Ref 22/03580/FUL

Dear Ms Crabb

Re: 13 Welcomes Road Kenley CR8 5HA - Demolition of the existing dwelling and erection of a terrace of 3 two storey dwellinghouses with accommodation within the roof with associated landscaping, refuse storage, car and cycle parking.

The Welcomes and Uplands Road Association (WURA) has a membership of over 230 households and is responsible for the maintenance of the roads in the area. We are therefore very concerned with the impact of new developments on those roads, the impact on the environment and the safety of all road users, particularly pedestrians and cyclists on these designated footpaths, and the amenity of WURA members.

It is on these grounds that we assess an application and these are the main reasons why we **OBJECT** to this proposal.

Overdevelopment and Massing

This proposal is similar in scope to 21/05931/FUL at 52 Welcomes Road, recently rejected by Croydon Council. One of the reasons for that rejection was that *“the proposal, by reason of its massing, site coverage, scale and overall bulk would result in overdevelopment of the site and would be visually intrusive and detrimental to the suburban character of the area, contrary to Policies D4 of the London Plan (2021) and Policies SP4 and DM10.1 of the Croydon Local Plan (2018) and the Suburban Design Guide SPD (2019)”*.

The percentage of the area of the plot occupied by the buildings in this proposal is significantly greater than was being proposed at no. 52 and therefore the same objection must be valid.

While there are substantial width properties to either side of the site, the aerial images show how much greater in depth the proposed block is, with the full-height dormer-style windows at the back appearing to dominate the neighbouring gardens.

Unsafe Access and Poor Parking Design

The Transport Statement tries to indicate that there is sufficient space for cars to turn round thus indicating that there should be no need to reverse out of the driveway onto Welcomes Road.

Chairman Colin Brown Willow Cottage 161 Welcomes Road Kenley CR8 5HB Tel 020 8668 2101
Treasurer Janice Scully 36 Church Road Kenley CR8 5DU Tel 07872 604583



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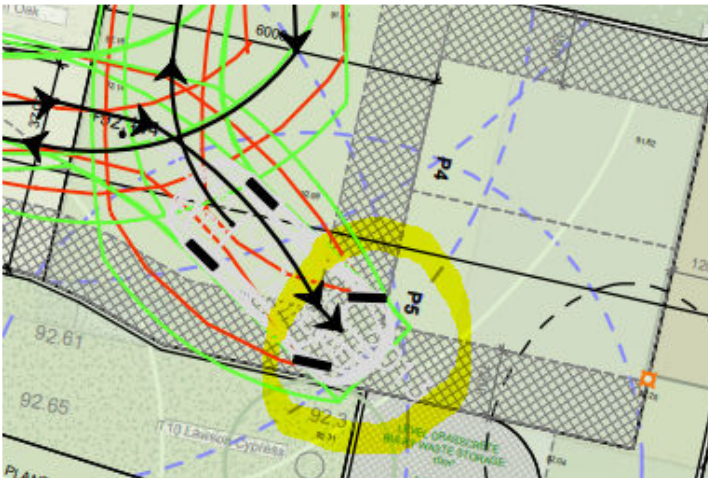


Fig 1: detail of swept path diagram from applicant's Transport Statement

It is clear from the swept path diagrams provided that this is not the case.

The diagrams already show overlap into a parking bay which means such a manoeuvre could not be carried out if that bay was occupied, see Fig 1.

There is a requirement for a pedestrian buffer zone in Section 3.6 of the latest SPD2. This proposal is clearly non-compliant and has no space available to use for such a buffer.

Unsustainable Construction Method Statement

The method statement indicates that "All deliveries should be able to reverse into the site from Welcomes Road at the existing main entrance." The tree survey shows how protective fencing will be placed around the majority of the front of the site.

We are now in a position where several developments have already been undertaken on Welcomes Road and it has become clear that HGV's have often been unable to turn on to sites due to the narrowness of the road, and most of these developments have had to do any loading and unloading from the road. This means frequent road blockages during the construction phase. Given the tree protection it is also unclear how there will be much space on site to store building materials.

Given the construction and width of the road, few developers have managed to carry out their work without damage to neighbouring properties and the road itself. This needs to be recognised at an early stage in the process, so that the developer is made to adjust their plans to account for the impact of the required construction work on the neighbourhood.

Cumulative Effect on Environment and Infrastructure of Overdevelopment in the Area

It is becoming more and more important that the actual impact on the road and the immediate surroundings is properly assessed when the number of developments already approved in a small area fronting a narrow road is so high. Previous acceptance of applications should not be accepted as a precedent as this takes no account of the snowballing impact on infrastructure and environment.

The following developments have already been approved for the lower portion of Welcomes Road alone:

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- No. 10 WR – 8 houses (nearing completion)
 - No. 32 WR – 9 flats (built)
 - No. 36 WR – 8 flats (built)
 - No. 42 WR – 7 flats plus 2 houses (under construction)
 - No. 46 WR - 6 flats plus 2 houses (under construction)
 - No. 50 WR - 6 flats plus 2 houses
 - No. 56 WR – 9 flats
 - No. 57 WR – 7 flats (built)
 - No. 60 WR – 7 flats plus 2 houses

Applications under appeal :

- No. 34 WR – 9 flats
- No. 37 WR – 9 flats

We make no apology for repeating this list in our letters because it is important to understand how many new properties are already built or in the pipeline. In addition there is also an application for 3 houses and 6 flats at 2 Welcomes Road and an application for the infill of 2 additional properties at 5 Welcomes Road.

So much development in such a small stretch of road does not represent “*an evolution of the existing character*” and directly opposes the need to “*not undermine the valued character*”, both requirements of the Croydon SDP. Furthermore, Policy DM10.11 of the Croydon Local Plan (CLP) states that “*Developments in focused intensification areas should ... a gradual change in character.*” These policies need to be adhered to and approval of yet another overdevelopment of a single plot so close to those already approved simply makes a mockery of such policy statements.

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. Individual developers may not have to take into account the cumulative effect of multiple applications in such a small area, but the Council must take an overall view as part of its approval process and enforce that decision to protect the area as required under Section 8 of the London Plan.

In addition, the impact of the population increase must also be considered with respect to the infrastructure. SES Water have recently asked residents to reduce water consumption because the distribution network is struggling. The increase from the already approved applications alone will add a significant burden to an aging infrastructure which already has insufficient capacity, not just for water distribution but also for the sewers.

WURA requests that this application be REFUSED

Yours sincerely

Colin Brown
Chairman

Cc (by email): Nicola Townsend, Head of Development Management
Ola Kolade and Gayle Gander – Councillors
Chris Philp – MP
KENDRA

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