



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: Aysegul Olcar-Chamberlin

27th June 2022

Ref 22/02285/FUL

Dear Ms Olcar-Chamberlin

Re: 2 Welcomes Road Kenley CR8 5HD - Demolition of existing bungalow and outbuildings and erection of a three storey building containing 6 x 2 bed flats and 3 x 3 bed terrace houses, with associated parking and landscaping.

The Welcomes and Uplands Road Association (WURA) with a membership of over 230 households is responsible for the maintenance of the roads in the area and is 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 considerations that we **OBJECT** to this proposal.

Cumulative Effect 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 is so high. Previous acceptance of nominally similar applications should not be accepted as a precedent, as suggested by applicant. 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:

- No. 10 WR – 8 houses
 - No. 32 WR – 9 flats
 - No. 36 WR – 8 flats
 - No. 42 WR – 7 flats plus 2 houses
 - No. 46 WR - 6 flats plus 2 houses
 - No. 50 WR - 6 flats plus 2 houses
 - No. 56 WR – 9 flats
 - No. 57 WR – 7 flats
 - No. 60 WR – 7 flats plus 2 houses
- Applications under appeal :
- No. 34 WR – 9 flats

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.*”



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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 should 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.

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"*.

We were pleased to see this being taken into account in the recent refusal for 52 Welcomes Road by the Planning Inspectorate, L5240/W/21/3267900, in paragraph 11 *"the proposals would erode the characteristic spaciousness of the area, with the cumulative effect of the flatted developments degrading the area's character"* and hope that this position will be maintained in light of the number of developments already approved.

Immediate Impact of Current Developments

We are now in a position where several developments of this size have already been undertaken on the road, we would also request that a detailed CLP is a pre-requisite of any work being done on this site. This report must include information on quantities and associated HGV traffic.

Given the construction and width of the road, few developers have managed to carry out their work without damage to neighbouring properties and/or 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 construction sites on our privately maintained roads.

The current developments have already had an impact on the Welcomes Road sewer with ongoing investigation work underway by Thames Water. Verges and roadsides have been damaged by vehicles which are too large for the roads and road closures during deliveries and utilities work have impacted the surrounding roads in Kenley. We are seeing more of the approved developments in the area becoming active which will only cause further disruption. There has been no enforcement by the Council of the recommended routes for HGVs and Council staff have stated that there is no resource available to do so.

Sites such as this one should be used to provide much-needed family accommodation, not to squeeze in the maximum possible number of 2-bedroom flats. As well as the more general impact of over-development covered above there are specific reasons to object this particular proposal:

Inadequate Parking and Pedestrian Access

The parking bays are shown as 2.5m wide. We understand bays suitable for disabled use should be at least 3.6m wide and a development of this size should support at least one such bay. The access to the block of flats also looks extremely narrow, unsuitable for a wheelchair user and is also hidden behind a parking bay making the location potentially dangerous.



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It's noticeable that even in Sketch Impression 3 the nose of the car extends across the access to the front door and the site layout shows the parking bay extending completely across the front access to the building.

There is no safe pedestrian access to the properties at the rear of the plot with a long stretch of limited width drive.

The parking space for one of the flats appears to be located at the rear and there appears to be very little space to manoeuvre for any of these bays. The swept path diagrams appear rather impractical, both in terms of the number of manoeuvres shown for a car to turn round and the arc of the turning circle needed to do so.

Whilst we recognise that this site is very close to Kenley Station, there is no capacity for visitor or tradesman parking. We believe the proposal *"will have a detrimental impact on highway safety due to (...) the shortfall of on-site car parking spaces, contrary to policies DM29 and DM30 of the Croydon Local Plan (2018) and policy T6.1 of the London Plan (2021)"*, a valid reason for refusal of a similarly scaled proposal at 67 Welcomes Road and it would also *"create a hazard to pedestrians, cyclists and vehicular traffic using the highways and accesses by reason of inadequate and unsafe access and parking arrangements and would thereby conflict with Paragraph 109 of the NPPF, Policies DM29 and DM30 of the Croydon Local Plan (2018) and Policies 6.3 and 6.12 of the London Plan 2015 (consolidated with amendments since 2011)"*, a reason to reject the proposal at 37 Welcomes Road.

Waste and Recycling Management

Para 5.68 of the Planning Statement indicates "Servicing and refuse collection will be undertaken on street from Welcomes Road". On a 'full' collection day this means the landfill, paper recycling and potentially a garden waste bin for each of the houses at the rear alone, not to mention the food waste. This is 9 full-size bins before the additional bins from the flats. All of these are to be placed by the street on a collection day?

This will either completely block the access route and/or clutter the road (<5m wide) itself, increasing the danger for all road users and contravenes policy DM13.1 of the CLP.

WURA requests that the application be REFUSED.

Yours sincerely

Colin Brown
Chairman

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