



WELCOMES AND UPLANDS ROAD ASSOCIATION

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The Planning Inspectorate
Temple Quay House
The Square, Temple Quay
Bristol
BS1 6PN

FAO Case Officer: Mr James Pocock

20th April 2022

Ref APP/L5240/W/21/3287426

Dear Mr Pocock

Re: Proposed development at 34 Welcomes Road CR8 5HD: Demolition of existing bungalow and the erection of a 4 storey building comprising of 9 flats with associated 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. Welcomes Road is a narrow road with no pavements and a designated Public Footpath which leads to Kenley Common and the heritage site at Kenley Aerodrome. WURA 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 a designated footpath, as well as the amenity of WURA members.

The developer has appealed to the Planning Inspectorate on the basis of non determination by Croydon Council. There have been several such appeals recently on Welcomes Road alone.

Given the scale of the development under consideration and the lack of key information in the proposal, we request very strongly that this application is **REFUSED**, for the following reasons:

1. Out of Keeping and Over-Development

The whole scale of the development is inappropriate for a plot of this size. The design presents as a solid expanse of building extending across the full width of the site with no variation of roof line. The recent rejection of a similarly large block at 88 Welcomes Road (L5240/W/21/3276882) included the fact that *“the width of the building across the site would appear cramped and leave little space for boundary planting”* and *“the bulk and height of the building at a full 3 storeys would appear overly dominant”*, both of which apply directly here and which are clearly demonstrated in the developer’s graphics of the front elevation.

Another recent rejection by the Planning Inspectorate for a nearby plot (L5240/W/21/3267900) references the mass of building to *“occupy a significantly greater proportion of the appeal site than the existing dwelling”* and that *“the proposals would erode the characteristic spaciousness of the area”*, both of which apply directly to the current proposal as there is absolutely no space in the plot to either side of the building.

In the same decision, it was stated that *“with 3 storeys plus roof the proposed building would be substantially higher than the existing property on the site ... Being close to the side boundaries of the site, the overall bulk would relate poorly to the neighbouring properties.”*

There has been no attempt to keep the character or integrate with the surroundings. The design statement implies there is no consistency in the current properties on Welcomes Road but in practice many other applicants have specifically referenced some key common features such as tiled pitched roofs, bargeboards for

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gable ends, large timber french doors and sash style windows, brick, stone and tile used on the elevations with detailing including stone cills and heads and tile bands with hanging tile features. The proposed design uses none of these features and presents as a multiple dwelling.

Given that among the reasons by Croydon Council for rejecting applications at other applications on Welcomes Road was that “*the proposals failed to integrate successfully within the immediate surroundings and would be detrimental to the street scene, contrary to Policies 7.4 and 7.6 of the London Plan (consolidated with alterations since 2011) and Policies SP4 and DM10 of the Croydon Local Plan 2018 and the Suburban Design Guide SPD 2019*” we believe very strongly that the same ruling should be made for this proposal.

The overall design of the building could hardly be more intrusive of its neighbours. It is in an elevated position with respect to the road with extended balcony areas on both the higher storeys. 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*”.

2. Poor Quality Proposal : Key Information Missing

Although there are many references to making the drive 1 in 20 there is absolutely no detail about how this will be achieved – especially without affecting the root systems of significant grade A trees with TPOs.

While the slope of the current drive near the road may well be not dis-similar, the base of the current property is significantly higher so a large amount of spoil will need to be removed. The grounds of appeal refer to retaining walls along the sides of the parking area due this area “being lowered” but with no detail. The graphics appear to show these walls as no higher than a car which seems inconceivable when the actual plot is considered. There are no cross sections showing either current or planned elevations of the landscape, no plans for removal of spoil, no details of the supporting engineering which will be required.

As well as these engineering details which may be considered to be specific to the problems intrinsic to the topography of this site, there is also a substantial amount of missing documentation which would normally be required of a full planning application:

- Construction Logistics Plan
- Environmental Impact Assessment
- Carbon reduction strategy – how would solar panels be implemented given the flat-roof nature of the design? Why isn't the use of a heat pump not being considered from the outset, when a drilling rig could actually gain access?
- Surface water management strategy – how will the large run-off from such a large construction be managed? Excess water must not enter the foul waste system nor be directed on to Welcomes Road, which already has a drainage capacity problem.

While these can be addressed with discharge notices, it should be noted that the former is especially important for this site, because the construction at the immediate neighbouring plot at no 32 demonstrated that large deliveries simply could not be made off-road as delivery vehicles could not access the site due to the steep driveway and narrow turning circle available. It is very noticeable that the CGI'd graphics do not show the current overall steepness of the site and the photos have been carefully angled to minimise the visual impact of the slope. HGVs will have to gain access to clear spoil before the height of the main part of the site can be reduced and it is not clear how this can even be achieved.

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We have already seen significant damage to the road from developments already underway. The road has subsided at the front of the site at no 42 and the road edges have broken away due to the impact of the HGV traffic from both no 10 and no 42. WURA believe the groundwork at no 42 generated about 170 extra HGV trips over and above what might be accepted as reasonable. Developers need to take responsibility for the impact of their work and include a proper assessment of the load and number of trips which will be required, potentially even accounting for the use of smaller vehicles.

3. Unsafe and Inadequate Parking Provision

As with so many of the previous applications for similar scale developments, there is inadequate parking for this proposal too. Yes, this may meet the legal minimum, but as stated in the appeal decision for L5240/W/21/3276882 *“there is no policy justification for treating the maximum parking standards as minima”*. The situation is 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 a designated footpath where no parking is permitted or even possible on the road or verges, so there is no capacity for overflow.

The swept path diagrams at the end of the Transport Statement (Part 1) clearly show how limited the access to the parking area is and how anyone maneuvering in that area to leave has no visibility of another vehicle turning in from the road, contrary to policies DM29 and DM30 of the CLP. It is also clear that any car parked in the bay nearest the access drive is at high risk from damage as cars entering or leaving the site go past.

There is no provision for disabled parking. If any full-sized bays suitable for use by disabled drivers are required (as they should be) then the parking provision becomes even more limited.

There does not appear to be any provision for disabled access. The front elevation graphics appear to show several steps leading to the front door.

4. Cumulative Effect of Overdevelopment in the Area

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”*.

Previous acceptance of nearby 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 Transport Statement for this application indicates “... approved schemes immediately adjacent to the application site where considered to be acceptable to LBC in transport and highway terms”. This kind of statement is an important example – the completion of prior builds at no 32 and 36 already have an impact on the number of car journeys and infrastructure which any new applications simply do not take into account, as they try to stand on the back of previous approvals. This can only get worse as other approved applications at numbers 42, 46, 50, 56 and 60 are completed.

So many approved applications in such a small stretch of road already have an impact on the streetscape. Approving yet another as an immediate neighbour 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*

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intensification areas should ... a gradual change in character." 34 WR is not even within the Kenley FIZ yet the combined level of change with its neighbours can no way be considered to be "gradual".

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 for the current proposal especially as there is already a significant increase in the number of developments already approved.

For all the reasons given above, WURA request that this planning application be REJECTED.

Yours sincerely

Richard Russell
Secretary

Colin Brown
Chairman

Cc (by email): - Jan Buttinger – Councillor
Ola Kolade - Councillor
Chris Philp - MP
KENDRA

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