



# 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: Ms Sara Burke

7<sup>th</sup> March 2022

Ref APP/L5240/W/21/3282853

Dear Ms Burke

**Re: Proposed development at 50 Welcomes Road CR8 5HD: Demolition of a single-family dwelling house and erection of 3-storey block and two 2-storey houses (5x 3-bed, 3x 2-bed) with associated parking refuse and cycle storage.**

As we have submitted a representation to you before, (under reference APP/L5240/W/21/3279128 for 54 Welcomes Road), you will be aware that the Welcomes and Uplands Road Association (WURA), which has a membership of over 230 households, is responsible for the maintenance of the roads in the area. Welcomes Road is a narrow road with no pavements which is a designated Public Footpath leading 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, and the amenity of WURA members.

We initially understood the developer had appealed to the Planning Inspectorate on the basis of non determination by Croydon Council but there also appears to be a later Officers Report on the Croydon Council Public Access Register so we are not exactly sure of the basis of the appeal. However, the same developer has previously submitted very similar plans for 46 Welcomes Road, with a block of flats to the front and two houses at the back and therefore by its very nature the objections to the application under consideration are similar to those already made to the Planning Inspectorate for no 46 (reference APP/L5240/W/21/3279654, currently in progress).

Given the scale of the proposal under consideration, we do request very strongly that this application is **REFUSED**, for the following reasons:

## 1. Overdevelopment and Intrusion

The whole scale of the development is inappropriate for a plot of this size. A recent rejection by the Planning Inspectorate for the immediately adjacent 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.

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 and the dwellings to either side. Being close to the side boundaries of the site, the overall bulk would relate poorly to the neighbouring properties.*" While this was referring to a block of 9 flats, the same criticism applies to the 3 storey block in the current proposal.

The height of the land to the rear of this plot indicated by the need for retaining walls means that the houses at the back will completely dominate the neighbours and indeed the outdoor space at the back of the flats, giving no privacy to those residents. The treatment of the land levels within the plot is not addressed in the application which is of itself a reason for rejection.

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An additional reason referenced in paragraph 14 of L5240/W/21/3267900 also applies directly : *“Due to its height, overall massing and alignment, the proposed building would be incongruous in the street scene. The massing of the proposed development would also screen views of the trees to the rear of the site, which would diminish their contribution to the attractive character and appearance of the area”* as the properties to the rear of the plot, being on higher ground, obscure the trees at the back.

Among the reasons for rejecting an application at 37 Welcomes Road and also the previous application for 52 Welcomes Road was that *“the development would be detrimental to the amenities of the occupiers of the neighbouring properties by reason of its mass, design and siting resulting in increased visual intrusion, sense of enclosure, and loss of privacy, and would thereby conflict with Policies DM10 of the Croydon Local Plan 2018, Suburban Design Guide SPD 2019, and 6.12 and 6.13 of the London Plan”*, we believe very strongly that the same ruling should be made for this proposal.

Similar reasons have already been used by the Planning Inspectorate to uphold rejected applications nearby in South Croydon, including appeal L5240/W/21/3266351 which specifically states the application *“would fail to be respectful of the existing place and would have a considerable and negative effect on the residential amenity of neighbours”* in conflict with several section of DM10 of the Local Plan.

## **2. Poor Access to the Back Section of the Site : Safety Implications**

Our understanding from the latest Building Regulations (Fire Safety 2019 edition with 2020 amendments, Section 13) that there should be access to within 45m of all points within a house which means that the fire appliance would need to approach using the access drive along the side of the block of flats. The minimum width required for fire engine access is 3.7m and the drive is stated to be less than that. Dead-end access routes longer than 20m also require turning facilities, clearly not possible here if there is anything parked in the visitor bays. The drive to the houses at the back of the site is extremely narrow (immediately to the east of the cycle-store the drive definitely narrows) as well as being close to the boundary with the adjacent property.

The drive is also insufficient to allow for safe passing of two cars. The size of many cars these days means that it would not allow a car to pass a pedestrian as there are no refuges for pedestrians. Given the bends at either end of the driveway it is possible that motorists might encounter each other and one or other will need to reverse to resolve the conflict. Again, this is a significant danger to pedestrians. Light spillage from car headlights is likely to be harmful to the neighbouring properties.

## **3. Poor Parking Design and Poor Access to the Flats**

The swept path analysis at the end of the Transport Statement (added in September 2021, long after the original application) show how dangerous the parking is at the front of the flats. Any vehicle parked in the southern spaces has to reverse out with no visibility whatsoever of any vehicles which may be approaching from the properties at the rear of the site. The space available to those in the northern spaces is simply insufficient to manoeuvre in if all the bays are populated.

It is notable that again there is a direct similarity to the parking design previously rejected in L5240/W/21/3267900, with no separate routes for pedestrians and very limited space. Indeed, because there was no access road to properties at the rear of the site in that case, the situation in the current proposal is worse as there is even less space for cars to manoeuvre in and vehicles can approach from both Welcomes Road and the rear of the plot. As stated in paragraph 32 *“the proposed forecourt layout is therefore unsatisfactory with potential conflict between pedestrians and vehicles”*.

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The disabled bays are significantly smaller than the recommended 3.6m wide which means the access path at the front of the flats will be blocked by vehicles parked in these bays. The narrower part of the footpath looks to be less than the minimal acceptable width of 1.2m and definitely insufficient for disabled use. Any future occupants would need to accept that disabled car users will need to park such that they block a significant width of the already narrow foot path.

The “visitor” parking bays for the properties to the rear are dangerously located at the curve of the drive and again have insufficient space around them to allow safe manoeuvring given that reversing will be necessary. We also note that any visitor arriving at the site will be unable to see if a visitor parking bay is available unless they drive down the driveway. If they then find the visitor bays occupied, they are likely to be left with no option except to reverse back along the very narrow driveway and reverse out onto Welcomes Road.

WURA believes this application conflicts with policies DM29 and DM30 of the CLP. Similar issues have been cited by Croydon Council in recent rejections at both 67 and 37 Welcomes Road and the same reasoning should be applied for the current application.

## 4. Traffic Impact and the Environment

The access statement acknowledges that the road is “narrow and is not standard 2 car width” but there is no reference to the fact that the access route is a public footpath.

As with the other proposals in the area, the developer is targeting family residents with young children, by including play areas and 3-bed flats as well as the houses. Such families need to get their young children safely to school, play groups and other activities. 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. This will mean a significant knock-on effect on the number of car journeys made by the new residents and with no transport statement we believe the applicant has failed to demonstrate that the development would propose suitable sustainable transport mitigation and would not harm highway safety, in conflict with policy DM30 of the Croydon Local Plan 2018 and Policy 6.13 of the 2016 London Plan.”

While we acknowledge that this is an Outline application, the ecological statement appears to be very broad brush, with a single visit being made at the extreme of the recommended period. We believe insufficient information has been provided to demonstrate that the development would not result in unacceptable harm to protected species and habitats, contrary to policy 7.19 of the London Plan (2016) and policies SP7.4 and DM27 of the Croydon Local Plan (2018).

The 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, cannot be easily re-instated once destroyed by over-development.

Given the unique benefits of the green locale, even on a general level, such intensification has to be “*harmful to the character and appearance of the area and therefore in conflict with Policies SP4 and DM10 of the Local Plan and Policies D3 and D4 of the London Plan, which amongst other things, seek to ensure developments respect the existing character and appearance of the locality in which they are sited*”, as stated in a recent Planning Inspectorate decision (L5240/W/21/3266351) for a nearby location in South Croydon.

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## 5. 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".

The developer has previously made reference to several already approved proposals on Welcomes Road as if this is a 'good thing'. However, it only goes to show how important it is that the proper allowance is made for the cumulative impact of all the developments which have already been accepted. Any decision must take into account the cumulative effect of overdevelopment in the area, with 8 applications for intensification of so called 'windfall sites' already approved and more still pending, representing around **140** new dwellings within the Welcomes and Uplands Road area alone.

Previous acceptance of nominally similar applications should not be taken as a precedent. In fact, it should be quite the reverse as it takes no account of the snowballing impact on infrastructure and environment. The acceptance of too many applications of this scale is contrary to both the Croydon Local Plan and the London Plan. Policy SP1 of the CLP refers to the need to "enhance local character, the heritage assets and identity of the Places of Croydon" : this cannot be achieved by the mass removal of mature trees and the green environment of a public footpath which is a recognised part of the Green Grid.

Table 6.4 of the CLP specifically refers to "Evolution without significant change of area's character" applicable under policies DM 10.1 to 10.10. The number of applications already approved will make a significant change which cannot possibly be considered to be evolutionary.

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.

**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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