



# WELCOMES AND UPLANDS ROAD ASSOCIATION

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FAO Case Officer: Mr Aaron Kang

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

4<sup>th</sup> August 2021

Ref APP/L5240/W/21/3267900

Dear Mr Kang

**Re: Proposed over development at 52 Welcomes Road CR8 5HD : Demolition of the existing dwelling and erection of a 3 storey building to provide 9 flats with associated parking, cycle storage, landscaping and children's play space.**

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 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.

There have now been two applications to develop this site, both refused by Croydon Council. It is clear to WURA that the applicant has not addressed any of the key issues identified in both refusals (previous application reference 19/05485/FUL and current reference 21/02085/FUL).

**WURA request that Croydon Council's refusal of this application is upheld.**

Previous acceptance of nominally similar applications must not be accepted as a precedent, as suggested by applicant. Such an approach takes no account of the snowballing impact on infrastructure and environment. It is worth putting this application in context. Already approved in the immediate vicinity of this proposal is not only no 56 but also 9 dwellings at no 32, 8 dwellings at 36, 9 dwellings at 42, 7 dwellings at 57 and 9 dwellings at no 60.

Specifically reviewing the basis of appeal for each of the reasons for refusal given by Croydon Council which impact the road, environment and amenity of WURA members:

***Croydon Council Planning Refusal Reason 1 "The proposal, by reason of its height, massing, siting, scale and overall bulk would result in overdevelopment of the site and would be visually intrusive and detrimental to the streetscene, contrary to Policies 7.4 and 7.6 of the London Plan (2016) and Policies SP4 and DM10.1 of the Croydon Local Plan (2018) and the Suburban Design Guide SPD (2019)."***

The developer's own appeal document makes it clear that the proposal is not "almost the same" as 56 Welcomes Road. The building area proposed for 52 Welcomes Road is 5% larger, which given the proportion of building on a plot this size is a significant amount. The proposed front elevation of 52WR appears significantly wider than 56WR. The proposed block at 52WR is also not angled to the road but presents a straight aspect which again result in a more dominating appearance.

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



Fig 1: developer's site plan from current application 20/05352/FUL

Viewing the block with respect to its immediate neighbours, as shown above from the application site plan, gives a true indication of its scale and massing. The building extends much more closely to the neighbouring property at no 54, presumably as a result of the proposal trying to provide adequate accommodation in 9 flats after the first proposal was rejected for sub-standard accommodation.

To suggest that "the proposed building would be reduced in width from the existing building and it would be setback from both side boundaries" is farcical when comparing a single storey bungalow to a three storey block, especially as much of the current width is a garage. If such a comparison is accepted, then perhaps the square-footage of the building presented to the street should be considered – easily more than three times as much, as shown below using images directly from the developer's application.



Fig 3: existing street elevation on left, proposed on right, taken from developer's elevation diagrams from current application 20/05352/FUL

Second and third floor balconies will overlook neighbours on both sides as they will be higher than any practical tree line on the boundary. 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".



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Fig 2: comparative street elevations with immediate neighbours, using separate components from same-scale drawings from previous and current applications for 52WR

**Croydon Council Planning Refusal Reason 2** *“The proposal, by reason of its generic design and architectural appearance and absence of character analysis, would result in a form of development that would appear out of character with the neighbouring properties and be detrimental to the general character and appearance of the area, contrary to Policies 7.4 and 7.6 of the London Plan (2016), Policies SP4 and DM10.7 of the Croydon Local Plan (2018) and the Croydon Suburban Design Guide (2019).”*

The developer’s appeal is based on the fact that “52 Welcomes Road material and architectural appearance & character analysis are same as 56 Welcomes Road”. This acknowledges a complete lack of originality in their own design! Welcomes Road has had a surfeit of development applications in the last couple of years with applications acknowledging the range of styles which already exist and making an attempt at some quality individual design. Indeed, the developer’s own appeal document references “Welcomes Road is defined by buildings which are in the main, individual in style”, rather in contradiction to the basis of their appeal.

In addition to those policies referenced, the Croydon Local Plan also states “The Council will require all new developments in the borough to contribute to enhancing a sense of place and improving the character of the area, whilst acknowledging the need for growth ... Development proposals should respond to and enhance local character” (Policy SP1.2) which a repetitive approach clearly does not.

**Croydon Council Planning Refusal Reason 3** *“The proposed development, by reason of the poor quality communal amenity space, and the absence of step free access to this space as required by M4(2): Accessible and Adaptable dwellings standards, would be contrary to Policies 3.5 and 3.8 of the London Plan (2016) and Policies SP2.8 and DM10.5 of the Croydon Local Plan (2018).”*

Again the developer’s appeal is based on the approval of no 56. An arguably poor previous decision should not be used as the basis for further bad decisions. The proposed “child play area” is not large enough to kick a ball around in and given the topography of the site is located on a steeply sloping area. While this slope is referenced in the appeal document, no real statement of how the topography is to be dealt with is made in the application itself, with no site cross-sections showing the elevation changes. The developer acknowledges level access is not provided at the rear, making this so-called communal space completely inaccessible to any residents with limited mobility. In other words they have no basis of appeal with regards this point of refusal.

If amenity includes how recycling is managed, then the proposal also fails to provide any capacity for bins to be placed kerbside for collection, in contravention of policy DM13.1 of the Croydon Local Plan.



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***Croydon Council Planning Refusal Reason 4*** *“Insufficient information has been provided regarding the vehicle crossover, vehicle manoeuvring details, pedestrian and vehicular sightlines, and the impact on the operation of the wider transport network considering the findings of the Kenley Transport Study. As such the proposal could result in harm to highway safety and pedestrian conditions on the site and in the immediate area, contrary to Policy 6.12 of the London Plan (2016) and Policies SP8, DM29 and DM30 of the Croydon Local Plan (2018)”*

The proposal has an inadequate number of parking spaces, all of which appear to be very narrow and certainly none of them are the requisite width for a disabled parking bay. There is no swept path analysis and the applicant’s own site plan shows how cramped the spaces provided are.

There is no reference to the fact that the access routes are Public Footpaths. There is no transport assessment or analysis of the impact on traffic volumes on Welcomes Road. Welcomes Road is narrow and a designated footpath where no parking is permitted on the road or verges.

This is an area where the cumulative effect must be accounted for. We are not just talking about 9-times as many car journeys being made here because of 1 dwelling being replaced by 9. Any traffic analysis must also account for the total impact of 9 + 9 + 9 + 8 + 9 + 7 + 9 families instead of 7 in the immediate vicinity, on a road with no pavements which is not only narrow but also a public footpath.

People going to work need to get there safely and families need to get their children safely to school. 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. It is used by non-residents seeking a quick route to Kenley Station and sadly not all drivers adhere to speed limits or even appear to be aware that there are no pavements for pedestrians.

The Council’s laudable aim is to reduce the dependency on cars, but the reality of the area is that even to get children to the nearest school it is far safer to drive than to walk. The increase in traffic caused by the intensified development only serves to add to the risk for other road users on a designated footpath which is already inherently dangerous for pedestrians and cyclists. These issues have already been identified by the Council in the Kenley Transport Study.

***Croydon Council Planning Refusal Reason 5*** *“Insufficient information has been provided regarding proposed tree removals, tree pruning and mitigation measures, or landscaping and the location of any retaining walls at the rear. As such, the proposal could have a detrimental impact on the borough’s trees and result in a substandard quality of landscaping and communal amenity space, contrary to policies 7.21 and 3.5 of the London Plan (2016) and policies DM10.5, DM10.8 and DM28 of the Croydon Local Plan (2018).”*

Mature trees to the front of the property will have to be removed to give space for the proposed parking area. This has a detrimental impact on the existing streetscene and the amenity space.

As indicated above under Refusal Reason 3, there is no statement of how the topography is to be dealt with is made in the application. To suggest that the Council are “... at liberty to ask for additional information and clarification during the planning application” is inappropriate. These are key areas for the basis of an application to be approved.

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***Croydon Council Planning Refusal Reason 6*** “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).”

To suggest that “... a detailed Wildlife Sensitive Lighting Scheme and Biodiversity Enhancement Strategy can be submitted with due condition on approval” is again inappropriate. Such information needs to be submitted as part of the basis of approval being granted.

**WURA request that this planning appeal be dismissed.**

Yours sincerely

Richard Russell  
Secretary

Colin Brown  
Chairman

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