



# 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

14<sup>th</sup> December 2021

**Ref APP/L5240/W/21/3279128**

Dear Ms Burke

**Re: Proposed development at 54 Welcomes Road CR8 5HD: Erection of 8 no. 2 storey semi-detached houses arranged over four buildings with associated landscaping, parking and vehicular access.**

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. It is important to note that 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 understand the developer has appealed to the Planning Inspectorate on the basis of non determination by Croydon Council, although they also attempt to identify several other issues in their appeal.

While we obviously cannot comment on the lack of a timely decision from Croydon Council, we do request very strongly that this application is **REFUSED**, for the following reasons:

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

The drive to the houses at the back of the site looks extremely narrow as well as being close to the boundary with the adjacent property.

Our understanding from the latest Building Regulations (Fire Safety 2019 edition with 2020 amendments, Section 13) is that there should be access to within 45m of all points within a house which means that the fire appliance would need to approach the rear properties using the access drive along the side of the site. The minimum width required for fire engine access is 3.7m and according to the site plan the drive is simply not that wide – to scale it looks to be barely 2.5m wide although the Transport Assessment indicates a width of 2.75m (para 3.9). How can this possibly be “considered suitable to allow access by fire appliances”? Dead-end access routes longer than 20m also require turning facilities, clearly not possible here if there is anything parked in the bays.

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 refuge area pedestrians. Given the bend in 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.

These issues are indicative that a site of this size cannot support this level of over-development.

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
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## 2. Poor Quality Proposal : Inadequate Allowance for Site Topography

The rear of the site is considerably higher than the level of the current property, as shown by the site section. It is not clear how the land to the back of the properties at the rear of the plot is being managed. Currently any ground floor access and probably windows actually appear to be below ground level. If this is not the intention, then there needs to be a proper cross-section, plans for removal of spoil with the number of applicable lorry journeys and details of the supporting engineering which will be required to ensure that land on either side remains stable.

We accept that the application is for outline permission, however we believe the issues identified are critical and need to be fully addressed as part of the planning decision.

## 3. Waste Management

The area allocated for the properties to the rear of the site for their recycling looks completely inadequate for 4 family-occupied properties. The bins will therefore overflow and block the already narrow drive. It would also appear that the recycling lorry is expected to go up the drive to access the area, an impossible manoeuvre as the narrowness of Welcomes Road means the lorry can probably not even turn off the road.

There is no provision for the bins to be available for collection kerb-side either from the properties at the front. To state that this will be "from the main carriageway in the same manner as the existing dwelling" (Transport Assessment, para 3.14) overlooks the fact that there will be 4 times as many bins. The proposal therefore does not provide adequate and accessible refuse storage. The application conflicts with policy DM13.1 of the Croydon Local Plan 2018.

## 4. No Disabled Access

While we appreciate the plan includes several wider parking bays intended for use by disabled people, it is noticeable that the houses as shown in the Planning Statement all seem to have a step up to the porch.

## 5. Poor Parking Bays

Although the design proposes two parking bays per dwelling and makes much of the space available for the swept paths, the bays themselves appear to be narrower than recommended and some of the swept paths look "interesting". Certainly the bays nominated for disabled use do not appear to be the recommended width of at least 3.6m.

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.

## 6. Inadequate Transport Assessment

The Transport Assessment document makes no actual assessment of the traffic impact of 7 more family dwellings on a single plot. Welcomes Road is a narrow road with no pavements, and a designated public footpath leading to the Kenley Heritage Airfield and Kenley Common.

The recent refusal at nearby 11 Hermitage Road included recognition of the "*unacceptable impact on the highways network given the cumulative impact of the development. The increased pedestrian and vehicular movement ... would compromise highways safety and there be contrary to the NPPF 2019, Policy 2.8 of the London Plan 2016, DM29 and DM30 of the Croydon Local Plan*". This current application must be considered on the same basis.

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## 7. Environmental Impact

The Planning Statement acknowledges there is “thick vegetation to the rear boundary” but does not fully represent it on the site plan. This will significantly overshadow the gardens at the rear of the site which with the houses to the front will be in virtually perpetual shade.

In addition, the parking bays at the front are shown extending into the hedging, so this is unlikely to be retained. Future residents are likely to prune this vegetation back or even kill it, to improve the amenity of their limited garden space.

## 8. Overdevelopment and Intrusion

The street-scene view noticeable omits the houses to the rear of the plot even though they will be plainly visible from the road given the topography of the site. Such a view would show how overlooking those houses will be, not only of the properties to the front, but also of their immediate neighbours to either side.

The site section graphic discreetly blanks all detail of the side walls of the rear properties but there are some windows, albeit relatively small ones. Given the high position of those properties, those windows will be very overlooking of the neighbours.

We reference the appeal decision for 36 Oakwood Avenue, Purley, CR8 1AQ, decision date 14th October 2021 under reference L5240/W/21/3266962:

In terms of Character and Appearance, the Inspector states in paragraph 6:

*“by virtue of the sub-division of the site to accommodate this number of dwellings, they would be markedly smaller plots than most other properties in the vicinity. The significant size and scale of the dwellings in relation to their plot sizes only serves to reinforce this conflict with the prevailing street scene”*

Splitting the site at 54 Welcomes Road into 8 plots would demonstrate the same problem.

And in paragraph 8:

*“The four ... houses would be squeezed towards the rear of the site and, particularly in the case of the northern two houses, their resulting small rear gardens would be likely to be overshadowed by neighbouring trees.”*

The layout and existing vegetation of 54 Welcomes Road has the same problem with respect to the houses at the rear of the site.

With respect to the Effect on Neighbours, in paragraph 14:

*“...there would be new activity and an increased level of noise associated with these 3 bed/4 person dwellings. This will be accompanied by associated effects such as engine noise, light spillage from cars and houses. This will all be taking place in close proximity to the existing gardens...”*



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And, in conclusion, paragraphs 15 and 16:

*“Cumulatively these factors would result in a significantly diminished living environment for the occupants of 34 and 38 Oakwood Avenue. Therefore, I am satisfied that the overall effect of the proposed development would be harmful to the living conditions of these neighbouring occupants.”*

*“Accordingly, the proposal would be contrary to Policy DM10 of the Local Plan and Policy D3 of the London Plan, which amongst other things, seek to ensure that occupiers of adjoining buildings are protected and that outdoor environments are comfortable and inviting for people to use”*

## 9. Cumulative Effect of Over Development

Any decision needs to take into account the cumulative effect of overdevelopment in the area, with 8 intensification proposals already approved and more still pending which represent 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.

To assess how the number of these developments is already out of proportion, we understand from some analysis done by the Kenley and District Residents Association (KENDRA) that there are 177 new units already approved since 2019 in Kenley against a target of 53 (calculated pro-rata from the 20 year target in the Croydon Plan 2020 assuming Kenley is 50% of the “Kenley + Old Coulsdon” area). This represents a rate of **over 3 times** that required to meet the new housing target for windfall properties. This is significantly over-target, which would indicate not only that the infrastructure will not cope with the impact but that the character of the area will be irreversibly harmed.

**WURA therefore 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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