



Development Management
Planning and Strategic Transport
Place Department, 6th Floor, Zone A
Bernard Weatherill House
8 Mint Walk
Croydon
CRO 1EA

FAO Case Officer: Russell Smith

11th July 2022

Ref 22/02402/FUL

Dear Mr Smith

Re: 5 Welcomes Road Kenley CR8 5HA - The erection of a pair of semi-detached houses adjacent to 5 Welcomes Road.

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 grounds that we assess an application and there are main reasons why we **OBJECT** to this proposal.

Overdevelopment and Massing, with commensurate Lack of Amenity

The percentage of building and hard landscaping on the site is breathtaking, clearly visible in the applicant's own Site Plan when the actual boundary is shown, see Figure 1 right.

The development plot is 375sqm. The Flood Assessment refers to an increase of impermeable surface area of 259sqm across the original plot, which represents 70% of the plot. Presumably this is based on permeable drive and patio surfaces, so in practice, as shown by the Site Plan, the proportion actually available for vegetation is at most 25%.

This ratio is not acceptable, especially within an area which is recognised as part of the Green Grid. These areas are to be protected under Section 8 of the London Plan.



Fig 1 : taken from developer's Site Plan with highlighted plot boundary



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This proposal is for one 4-bedroom and one 5-bedroom property, each of which would typically be occupied by 4 or 5 people with actual sleeping capacity of 6 and 7 people respectively. There is minimal outside amenity space, clearly insufficient for any family – no rear garden so no private play area for children.

This application proposes an extremely high level of intensification which would typically be considered for city centre locations, not for an area which is recognised as being distinctive for its “green infrastructure” and “spaciousness”, as identified in the CLP.

Poor Quality Proposal : Inadequate Allowance for Site Topography

The whole management of the site from the perspective of the topography is insufficiently defined, with no proper site cross-section showing current and proposed levels. There is a reference in para 5.2 of the Design & Access Statement that *“the plot would be reduced in level to be at a similar level to the two roads which would allow easier access to the houses, with a maximum gradient of 1:20”* when it is not even clear how this can be achieved given the difference between the height of Kenley Lane and Welcomes Road.

The elevation diagrams seem to indicate a difference of 0.9m between the base of the two houses. The Site Survey shows the range of spot heights with a typical difference of 1.4m between Kenley Lane and Welcomes Road. Even taking into account some kind of balancing in height between the two roads, it would seem that there will still be a steep slope at the front of the property on Welcomes Road and probably a similar issue for the property on Kenley Lane. This slope impacts both parking areas as well as the landscaping of the “garden”.

Given there is also significant variation in height along the road as well, there needs to be a far more detailed design showing cross-sections of the site both north/south and east/west and what the proposed finished ground levels will be. The minimal diagram within the Site Plan is insufficient for a plot with such complex topography. It is likely that there is even a need for retaining walls to support the existing land levels of the adjacent properties, as the applicant notes in passing that *“Kenley Lane has a gradient of around 1:11”*. If this is the case, then the proportion of ground available for green space is even less than already discussed.

Unsafe Access and Poor Parking Design

The proposal requires two new driveway access points to be opened up, one on Kenley Lane and the other on Welcomes Road.

In both cases the parking spaces require the user to either “drive on, reverse off” or vice versa. The plot is close to the junction where both Kenley Lane and Welcomes Road join Valley Road. Both roads are narrow, particularly in the case of Kenley Lane at this point as it is a single-track section of the road. There are no pavements on Welcomes Road or Kenley Lane. Even without these limitations, the necessary manoeuvring vehicles so close to a junction would be extremely unsafe.

Given the gradient issues with the land itself, it is likely that these parking spaces would be too steep to be practical and some vehicles would ground as happens outside the new development at 32 Welcomes Road.

The application does not include any swept path analysis, which need to take into proper account the narrowness of both Kenley Lane and Welcomes Road along with the gradient of the parking entrances.



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There is a requirement for a pedestrian buffer zone in Section 3.6 of the latest SPD2. This proposal is clearly non-compliant and has no space available to use for such a buffer.

It should also be noted that opening any new driveway access to Welcomes Road must be done with the agreement of WURA, separate to any conditions required by Croydon Council in terms of the Highways Acts. Any recent new access points have always been for plots that support vehicles entering and leaving in in a forward gear.

Waste Management

The lack of outdoor space means that the bins will be either cluttering paths or blocking access for the parking bays and given the expected driveway slope, it will be difficult to safely position the bins adjacent to the highways ready for collection.

Cumulative Effect on Environment and Infrastructure of Overdevelopment in the Area

It is becoming more and more important that the impact on the road and the immediate surroundings is properly assessed when the number of developments already approved in a small area fronting a narrow road, is so high. Previous acceptance of applications should not be accepted as a precedent as 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 (under construction)
 - No. 32 WR – 9 flats (Built)
 - No. 36 WR – 8 flats (Built)
 - No. 42 WR – 7 flats plus 2 houses (UC)
 - 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 (Built)
 - No. 60 WR – 7 flats plus 2 houses
- Applications under appeal :
- No. 34 WR – 9 flats

We make no apology for repeating this list in our letters because it is important to understand how many new properties are already built or in the pipeline. In addition there is also an application for 3 houses and 6 flats at 2 Welcomes Road, immediately opposite the site under current consideration. While the current application may appear relatively small in comparison, it represents an in-fill development which is grossly over-sized for the plot and which adds to the overall total.

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.*” 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 must take



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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.

In addition, the impact of the population increase must also be considered with respect to the infrastructure. SES Water have recently asked residents to reduce water consumption because the distribution network is struggling. The increase from the already approved applications alone will add a significant burden to an aging infrastructure which already has insufficient capacity, not just for water distribution but also for the sewers.

Immediate Impact of Current Developments

We are now in a position where several developments have already been undertaken on Welcomes Road and we would request that a detailed CLP is a pre-requisite of any work being done on this site. This should include a quantitative analysis of any spoil removal and the expected number of HGV journeys to complete the development. A full soil analysis is also required to determine the kind of footings required.

It is also clear that any loading and unloading must be done from the road, which means frequent road blockages during the construction phase. The site is so cramped that there will be nowhere to store building materials.

Given the construction and width of the road, few developers have managed to carry out their work without damage to neighbouring properties and 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 required construction work on the neighbourhood.

The current developments have already had an impact on the Welcomes Road sewer with ongoing investigation work on it 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.

WURA requests that this application be REFUSED

Yours sincerely

Colin Brown
Chairman

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

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