



# 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 Stephen Wallis

2<sup>nd</sup> December 2021

Ref APP/L5240/W/21/3276882

Dear Mr Wallis

**Re: Proposed development at 88 Welcomes Road CR8 5HE : Demolition of existing bungalow and redevelopment to provide a 3 storey building containing 9 apartments including parking, landscape and amenity areas.**

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. 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. Out of Keeping and Over-Development

While we recognise that this is an Outline application, there are already some obvious statements and graphics which show how out of keeping with its surroundings and obtrusive this proposal is.

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 accommodation and uses the development at no 57 to show "evolving character". In practice, many other applicants have specifically referenced some key common features such as tiled pitched roofs, bargeboards for 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 throughout. No 57 actually exhibits many of those design elements in the photo used to illustrate the opposite. No 57 also presents as a single dwelling. The proposed design in the graphics uses none of the documented features and presents as a multiple dwelling.

Given that among the reasons for rejecting previous applications at both 37 and 52 Welcomes Road were that the "*proposals failed to integrate successfully within the immediate surroundings and would be detrimental to the streetscene, 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 and that any reference to the LPA being "largely happy with the amended plans" within the Appellant's Statement of Case must be considered with these recent rejections in mind.

Indeed, similar reasons have already been used by the Planning Inspectorate to uphold rejected applications nearby in South Croydon, including appeal references L5240/W/21/3266351 and L5240/W/21/3266962.

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



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## 2. Insufficient Parking Capacity and Poor Parking Design

This location is in an extremely low PTAL area of 0 and while we acknowledge that the parking capacity is within the range identified in the London Plan it is worth noting that PTAL rating makes no account of capacity for parking nearby. We understand the aim of reducing car ownership, but given our observations above and the fact that no parking is allowed on Welcomes Road it is clear that to provide 1 parking space per dwelling and no spare (visitor) space where there are 6 x 2-bed flats and 3 x 3-bed flats is inadequate. Indeed, the changes made in April 2021 actually reduced the parking capacity by moving the bin store over an allotted parking space.

The parking design itself is not viable and at the very least is extremely hazardous. In detail:

- 1) The swept paths shown from some of the bays are very convoluted, requiring excessive amounts of maneuvering if larger than average cars are parked in these spaces (which is more than likely given the terrain of the area).
- 2) The information for all the swept paths is called into question as many of the bays appear too short and the maneuvering space insufficient (it should be 6m as a minimum). Any car parked in any of the bays with part of its body over hanging the marked parking space will clearly reduce the available maneuvering space further.
- 3) It is likely that many cars using this parking area as a matter of necessity will reverse and use the parking area entrance as a turning point. This would have specific concerns in terms of pedestrian safety at the front of the proposed building and the very poor visibility on the side access road.

Limited and unviable parking is key on this site given that there is no parking space on Welcomes Road and as a designated footpath leading to the Kenley Heritage Airfield and Kenley Common, parking on the road except briefly to make deliveries, is illegal anyway. There is insufficient capacity for the flat dwellers themselves, let alone for visitors, deliveries to the flats, tradesmen, etc. All of these will have a direct impact on the road by causing obstruction. The application would thereby conflict 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.

## 3. Very Poor Disabled Access

The application feels as if it is giving mere lip service to disabled access as the proposal is not practical.

The 2 parking bays marked for disabled use are immediately adjacent to the only pedestrian access footpath to the front door of the building. Strangely, the design appears to propose disabled parking bays that are narrower than some of the standard parking bays. This can hardly provide proper access as disabled bays are normally at least 3.6m wide. It is accepted that the foot path provides some additional space for a disabled user. However, with the disabled parking bays being so narrow it likely that any cars parked in these bays will significantly impinge on the walkway causing a hazard.

It is then noted that the only access path to the front door is already the minimum acceptable width at 1.2m wide. With the potential for the cars to then reduce the foot path width even further the available footpath width could easily be as low as 80cm if not worse, completely inadequate for even able-bodied access.

WURA notes that the proposal incorporates an elevator so that there is full disabled access to all levels of the building. However, it is very disappointing that disabled users may not be able to enter/exit the building due to the very poor disabled parking provision and narrow entrance.

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## 4. Cumulative Effect of Over Development

As WURA have stated in several recent objections, Croydon Council must 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 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 cannot cope with the impact but that the character of the area will be changed.

In summary, we have demonstrated that the application does NOT accord with many of the statements in the Conclusion of the Appellant’s Statement of Case, specifically:

- The application does NOT “meet with (...) local policies”
- The inference that the “principle of intensified residential development is acceptable” is INCORRECT
- The proposed building does NOT present with an “acceptable relationship” with the adjacent properties
- The access and parking are plainly dangerous and therefore NOT acceptable

**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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