



WELCOMES AND UPLANDS ROAD ASSOCIATION

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

FAO Case Officer: Mr M Saleem

1st June 2021

Ref 21/02085/FUL

Dear Mr Saleem

Re: Proposed development at 34 Welcomes Road CR8 5HD: Demolition of existing bungalow and the erection of a 4 storey building comprising of 9 flats with associated parking

As we haven't contacted you before regarding applications, we hope you are fully aware of our position. 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. It is on these considerations that we **OBJECT** to this proposal.

Cumulative Effect of Overdevelopment in the Area

It is becoming more and more important that the actual impact on the road and the immediate surroundings is properly assessed and considered when the number of developments being proposed for such a small area. We hope you review all the applications currently pending and recently approved for Welcomes Road and consider this one in the light of the cumulative effect of those which have already been approved. Indeed, as you will be aware, the applicant has another current proposal for 67 Welcomes Road (21/02425/FUL) and given the similarity in scale and approach of both, many of the grounds for objection are similar.

Previous acceptance of nominally similar applications should not be accepted as a precedent, as suggested by applicant. This takes no account of the snowballing impact on infrastructure and environment.

The Transport Statement for this application indicates "... approved schemes immediately adjacent to the application site where considered to be acceptable to LBC in transport and highway terms". This kind of statement is an important example – the acceptance of two prior builds at 32 and 36 already have an impact on the number of car journeys and infrastructure which any new applications simply do not take into account, as they try to stand on the back of previous approvals.

Those two builds also already have an impact on the streetscape. Approving yet another as an immediate neighbour 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.*" 34 WR is not even within the Kenley FIA yet the combined level of change with its neighbours can no way be considered to be "gradual".



WELCOMES AND UPLANDS ROAD ASSOCIATION

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Both the Transport Statement and the Design and Access Statement make reference to the 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 recognition of the cumulative impact of all the developments which have already been accepted. We make no apologies for repeating this information for all the current proposals and emphasise again that this application needs to be considered in the context of the around **140** new dwellings within Welcomes and Uplands Roads and its spur roads alone.

Already approved :

- No. 10 WR – 8 houses (work about to start)
- No. 32 WR – 9 flats (marketing)
- No. 36 WR – initially 7, now 8 flats (sold)
- No. 42 WR – 7 flats plus 2 houses (to start)
- No. 56 WR – 9 flats
- No. 57 WR – 7 flats (marketing)
- No. 60 WR – 7 flats plus 2 houses
- No. 35 UR – 6 houses
- No. 8 KC – 4 houses

Applications pending :

- No. 34 WR – 9 flats (this application)
- No. 46 WR - 6 flats plus 2 houses
- No. 50 WR - 6 flats plus 2 houses
- No. 54 WR – 8 houses
- No. 67 WR – 8 flats
- No. 88 WR – 9 flats
- No. 90 WR – 3 houses
- No. 2 KC – 4 in-fill flats
- No. 1 KC – 9 houses
- Nos 2 and 4 WR with developers

Applications under appeal :

- No. 52 WR – 9 flats

We urge the Council to remember that while developers have the right of appeal, we, the neighbours directly impacted by such developments do not. 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 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.

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

In addition to all the above points, this application should be **REFUSED** even on its own, for the following reasons:

Inaccurate Transport Assessment: Safety Risk

To state that Welcomes Road "not subject to regular through-traffic and generally only serves the dwellings that take access from it" (para 2.3) is demonstrably inaccurate – please view any applications for roads around Hayes Lane and they will be proposing access to Kenley Station via Welcomes Road.



WELCOMES AND UPLANDS ROAD ASSOCIATION

www.wura.org.uk

Although the road is a “two-way access road” (para 2.3), this is misleading as Welcomes Road is less than 5m wide in many sections where one vehicle has to pull into a driveway to let another pass. At least other recent applications have recognised the fact that the road is narrow and is not standard 2 car width.

To state that “...this arrangement results in an integrated slow-moving route shared by both vehicles and pedestrians” (para 2.4) is also entirely untrue as can be attested by any non-driver user of the road. It is unsafe for pedestrians and cyclists with a serious accident more likely as the number of vehicles using the public footpath increases, including those manoeuvring into and out of extremely limited parking areas (as proposed for this development) resulting in road blockages.

By including several 3-bed flats the developer is presumably targeting family residents with young children. 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 we believe that by simply referencing previous approvals, the applicant has failed to demonstrate that the development would not harm highway safety in conflict with policy DM30 of the CLP and Policy 6.13 of the 2016 London Plan.

Poor Quality Proposal: Inadequate Allowance for Site Topography

Although there are many references to making the drive 1 in 20 there is absolutely no detail about how this will be achieved – especially without affecting the root systems of significant grade A trees with TPOs.

While the slope of the current drive near the road may well be not dis-similar, the base of the current property is significantly higher. There are no cross sections showing either current or planned elevations, no plans for removal of spoil, no details of the supporting engineering which will be required.

Out of Character

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 but 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 sills and heads and tile bands with hanging tile features. The proposed design uses none of these features and presents as a multiple dwelling.

Among the reasons for rejecting the applications for 37 and 52 Welcomes Road was that;

“ the proposals failed to integrate successfully within the immediate surroundings and would be detrimental to the street scene, 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 consider that the same ruling should apply to this proposal.



WELCOMES AND UPLANDS ROAD ASSOCIATION

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Unsafe and Inadequate Parking Provision

As with so many of the previous applications for similar developments, there is inadequate parking for this proposal too. However, it appears to be even worse here given the number of 3-bedroom flats. Occupants are highly unlikely to have only one car and no visitors. Welcomes Road is narrow and is a designated footpath where no parking is permitted or even possible on the road or verges, so there is no capacity for overflow.

The swept path diagrams at the end of the Transport Statement (Part 1) clearly show how limited the access to the parking area is and how anyone maneuvering in that area to leave has no visibility of another vehicle turning in from the road, contrary to policies DM29 and DM30 of the CLP.

It is also clear that any car parked in the bay nearest the access drive is at high risk from damage as cars entering or leaving the site go past.

There is no provision for disabled parking or access. Why are there no electrical charging points actually included in the proposal as opposed to indicated as a possibility?

Such problems are symptomatic of over-development: the site simply cannot support this number of dwellings.

Poor Quality Proposal: Missing Information

Despite being a full planning application, we note that the following documentation is missing:

- Construction Logistics Plan (CLP)
- Environmental Impact Assessment
- Surface water management strategy – how will the large run-off from such a large construction be managed? Excess water must not enter the foul waste system nor be directed on to Welcomes Road, which already has a drainage capacity problem.

A viable CLP is especially important for this site which is topographically similar to the land next door at 32 Welcomes Road where 9 flats have just been completed. During construction of these flats deliveries could not be made off-road as delivery vehicles could not access the site due to the steep driveway and narrow turning circle available. Materials had to be stored on the road and in the driveway because of lack of space on site and then had to be craned up to the actual construction area. These issues coupled with connection of the utilities blocked the narrow road on a regular basis and made life very difficult for members trying to access their property. Although the current application does state the drive is to be made to 1 in 20, it is very noticeable that the CG Images do not show the reflect the severe steepness of the site and the photos have been carefully angled to minimise the visual impact of the slope. HGVs will have to gain access to clear spoil before the height of the main part of the site can be reduced.

No Pedestrian Buffer

The site layout and graphics both show a brick wall to the front of the site, immediately next to the road. While we acknowledge that a similar wall is already in situ, we note that the requirement for a 1.5m pedestrian buffer zone required by Section 3.6 of the SPD is not being met. It is worth noting that this requirement is actually difficult to achieve without significantly reducing the area available for parking, given the topology of the site.



WELCOMES AND UPLANDS ROAD ASSOCIATION

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Overdevelopment and Intrusion

The illustration of the street scene shows how densely built-up having two blocks of apartments next to each other will appear, completely changing the character of the surroundings, as discussed above.

Given that among the reasons for rejecting applications at both 37 and 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 consider that the same ruling should apply to this proposal.

The overall design of the building could hardly be more intrusive for the neighbours, with extended balcony areas on both the higher storeys. 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”*.

Waste Access

We can see no provision made for the bins to be available kerbside on collection day without completely blocking the access route and/or cluttering the road itself, increasing the danger for all road users. Are the operatives meant to come up to the bin store? This contravenes policy DM13.1 of the CLP.

In summary, this proposal does not represent good quality sustainable family accommodation. With 3 x 3 bed flats, it provides a token ‘tick in the box’ for the 30% target 3-bed accommodation but very little else.

WURA requests that the application be REFUSED.

Yours sincerely

Richard Russell
Secretary

Colin Brown
Chairman

Cc (by email): - Nicola Townsend, Head of Development Management
Jan Buttinger -Councillor
Ola Kolade- Councillor
Chris Philp - MP
KENDRA