



WELCOMES AND UPLANDS ROAD ASSOCIATION

www.wura.org.uk

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 Justin Reid-Weekes

20th August 2021

Ref 21/04059/FUL

Dear Mr Reid-Weekes

Re: Proposed development at 37 Welcomes Road CR8 5HA: Demolition of the existing dwelling, erection of a two/three storey building to provide 9 residential units, with associated landscaped areas including parking, cycle and refuse storage

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. We have itemised specific reasons for this particular application below but would first like to emphasise that new applications such as these should now be rejected due to the cumulative effect from those which have already been accepted.

Cumulative Effect of Overdevelopment in the Area

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 recognized 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 can not possibly be considered to be evolutionary.

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.

Already approved :

- No. 10 WR – 8 houses
- No. 32 WR – 9 flats
- No. 36 WR – initially 7, now 8 flats
- No. 42 WR – 7 flats plus 2 houses
- No. 56 WR – 9 flats

Applications pending :

- No. 34 WR – 9 flats
- No. 37 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

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



WELCOMES AND UPLANDS ROAD ASSOCIATION

www.wura.org.uk

- No. 57 WR – 7 flats
- No. 60 WR – 7 flats plus 2 houses
- No. 35 UR – 6 houses
- No. 8 KC – 4 houses
- Plots in KIZ under negotiation
- 2 and 4 WR
- Other 78WR
- 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
- 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 the above, this application should be **REFUSED** even on its own, for the following reasons:

Inconsistent Information : Poor Quality Proposal

It is not actually clear how this building will actually look in terms of street scene and how it will work with the topography of the plot. Cross section BB gives an indication of the height variation from front to back:



This gives an excellent indication of the height of the parking area with respect to the road. How can this be constructed without adversely affecting the TPO trees to the front of the property?

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



WELCOMES AND UPLANDS ROAD ASSOCIATION

www.wura.org.uk

The CGI pictures give differing views of the effect of the slope to the front and the images omit the proposed cycle storage and recycling area. One image also completely omits the TPO trees, giving a misleading impression of light and space for the windows and balconies to the front of the building.



While accepting that these are “artists’ impressions”, they do represent some critical aspects of the design. For example, the graphics indicate wooden shuttering and pillars between the parking bays. Those pillars are not shown on any of the block plans and given the tightness of the parking spaces would render the bays unusable.

In addition, the “landscape shown selectively” in the site plan includes a large seating area on the most steeply sloped part of the plot. If this land is to be levelled sufficiently to allow for such seating, then the retaining walls and engineering approach need to be defined.

The Flood Risk Assessment does not provide sufficient detail on the actual approach to be taken, only a discussion of the options available. This is not good enough for a full planning application. The current developments have already had an impact on the Welcomes Road sewer with ongoing investigation work underway by Thames Water. There is no capacity for additional flow. If Design Option 2 is to be adopted, then the siting of the geocellular crates must be defined : these cannot be located to the front of the property without damaging the roots of the TPO trees.

Lack of Amenity and No Disabled Access

We see very little improvement to the earlier proposal in terms of real access to high quality communal outdoor amenity space as required by Policy DM10.5, despite the attempt to argue otherwise in the Planning Statement. Tiny terraces and balconies do not provide much outdoor amenity and there is no facility for children’s play areas.

More fundamentally, there is no step-free access to the property. Yes, there is access via the vehicle access route, but this is not a safe passage. It appears that the pedestrian access path to the front door is already the minimum acceptable width at 1.2m wide. The door to the “external lobby” is obviously narrower : far too narrow for a wheelchair. The whole design does not support disabled accessibility.

Unsafe and Inadequate Parking Provision

As with so many of the previous applications for similar developments, there is inadequate parking for this proposal too. Although there is provision for 9 places, are residents really never going to have any visitors, workmen or deliveries? 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.

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



WELCOMES AND UPLANDS ROAD ASSOCIATION

www.wura.org.uk

The proposed layout means that all cars using one side of the parking area have to cross the pedestrian access. Indeed, many of the manoeuvres to park any of the cars will result in crossing the pedestrian access, making that access completely unsafe. It is also not clear from the information provided whether some of these parking bays will be sloped or not; if they are, that further increases the risk to any parking manoeuvres.

Parking bay 9 is inaccessible from the dwelling itself due to being completely blocked in on that side by the vehicle in bay 8. The site plan also appears to assume it can splay into the neighbour's land at the boundary with the road. In fact, the step in the boundary shown on that side looks rather unlikely; if the boundary is actually straight that means further restriction on the amount of manoeuvring space for vehicles on that side of the parking area.

Retaining the road access for parking bay 9 means that with the new main access route there will be yet another vehicle crossover point on a public footpath. The cumulative effect of such crossovers not only increases the hazard for pedestrians on the public footpath but is also detrimental to the street scene.

The proposed parking spaces are stated to be 2.5m wide and 5m long. This does not appear to account for the width of pillars as shown in the street scene images. It also does not account for the requirement that bays located next to walls or landscaping structures should be 3m wide. The length of the bays provides very little leeway for estates, MPVs and SUVs. Indeed, if one of those was parked in bay 9 it would probably extend out into the road. Clearly there is actually insufficient space to support the number of bays being proposed.

There is no provision for a disabled bay and no spare space which could be used as such bays should be at least 3.6m wide.

As with the previous proposal for this site, this proposal still fails to meet the CLP Policies DM29 and DM30 and Policies 6.3 and 6.12 of the London Plan.

Damage to Trees and the Environment

The parking layout includes the construction of hard-standing within the root protection zone of a TPO tree. Despite reference to "hand digging", this is simply impossible to construct without damaging the root system of that tree. Similarly, both the vehicle and pedestrian access routes are being built within the RPZ of both TPO trees. Those trees cannot but fail to be adversely impacted not only by the work but permanently thereafter by the resulting hard landscaping.

The location of the cycle storage is directly under the canopy of a TPO tree. The construction needed for its base will also impact the roots.

As with the previous proposal for this site, the development would conflict with Policies DM10 and DM28 of the CLP and 7.4 and 7.21 of the London Plan.

Misleading Transport Assessment

The Transport Assessment proposes trip figures which simply do not stack up. The statistics for the 9 dwellings are based on figures from Enfield, Hackney, Hounslow and Islington.

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



WELCOMES AND UPLANDS ROAD ASSOCIATION

www.wura.org.uk

All these areas are substantially more built-up than Kenley with more immediate access to public transport, shops, schools etc. To suggest that only trips would only increase to 29 per 12 hour day despite the increase from 1 to 9 dwellings (with a corresponding population increase) seems inadequate. Even accepting those figures, to describe a 6-fold increase as "negligible" is plainly misleading and inaccurate.

There is no allowance for deliveries, service vehicles or visitors. There is nowhere for vehicles associated with this activity to park and no accounting for the increase in traffic as a result of their being 9 independent dwellings rather than 1. Do the residents never get a delivery? Are the developers guaranteeing that all appliances installed in these apartments will never fail (most especially the lift, well-known for needing a high level of maintenance), the decorating will never need to be redone?

As with the previous proposal for this site, the development would conflict with policy DM30 of the CLP and Policy 6.13 of the 2016 London Plan.

Waste Access

The bin store capacity looks inadequate for 9 dwellings.

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 and is yet another indicator of the site being unable to support this number of dwellings.

Overdevelopment and Intrusion

This proposal with its back-set location with respect to its neighbours means that the back gardens of those neighbours will be lined with ugly 2 to 3-storey walls. Both side elevations incorporate windows which will look directly into the neighbouring gardens and it is suggested that some of these are not even obscured. In many cases, these side windows represent the only light source for the room so restricting that light source has a further impact in terms of poor quality accommodation for the residents.

The topology of the plot means that by placing the block further back from the road it is even further raised with respect to its neighbours.

The inclusion of balconies also means neighbouring properties will be directly overlooked.

Poor Quality Accommodation

One of the reasons for the dismissal of the previous application for this site was sub-standard accommodation. We see no improvement in this current application, although for different reasons. Unit 9 has a bedroom without a window and therefore no natural light. The developer uses CGI to show light and open space to the front where there are already mature TPO trees. The steepness of the slope at the back also restricts the light available, and with the inclusion of balconies the actual light reaching many of the windows will be substantially reduced. 9 residential units have been squeezed into this plot to maximise the return for the developer.

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



WELCOMES AND UPLANDS ROAD ASSOCIATION

www.wura.org.uk

It is noticeable that the breakdown of the actual accommodation being offered only appears on page 7 of the Design and Access Statement. This application does not meet the target of 30% 3-bed accommodation and certainly does not provide family homes.

In summary, this proposal does not represent long-term family dwellings and is not good use of the plot. We believe there are many good reasons to reject this application in its own right, but was also believe that it is critical that the cumulative impact on the road and the immediate surroundings is properly considered. The number of developments already agreed for such a small area must be taken into account when further applications are being assessed. 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.

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

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