



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 J Goodwin-Roberts

14th December 2020

Ref 20/06250/OUT

Dear Mr Goodwin-Roberts

Re: Proposed development at 46 Welcomes Road CR8 5HD: The erection of a frontage block of six flats and a pair of semi-detached houses and the demolition of the existing detached bungalow.

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.

We are hopeful that recent refusals for similarly intensive proposals mean that proper consideration is now being given to the cumulative effect of all the recent applications for overdevelopment.

WURA **OBJECTS** to this new application and requests that it be **REFUSED** on the following grounds:

1. Overdevelopment and Intrusion

The height of the land to the rear of this plot indicated by the need for retaining walls means that the houses at the back will be completely dominant of their immediate neighbours and indeed the outdoor space at the back of the flats, giving no privacy to those residents.

Given that among the reasons for rejecting the application at 37 and the previous application for 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 believe very strongly that the same ruling should be made for this proposal.

In addition, there are 2nd storey windows in the side elevations of both the houses and the flats which will directly overlook the neighbouring properties.

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

Our understanding from the latest Building Regulations (Fire Safety 2019 edition with 2020 amendments, Section 13) that there should be access to within 45m of all points within a house which means that the fire appliance would need to approach using the access drive along the side of the block of flats. The minimum width required for fire engine access is 3.7m and the drive is simply not that wide. Dead-end access routes longer than 20m also require turning facilities, clearly not possible here if there is anything parked in the visitor bays. The drive to the houses at the back of the site is extremely narrow (immediately to the east of the cycle-store the drive is just 2.3m wide) as well as being close to the boundary with the adjacent property.

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 bends at either end of 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.

3. Poor Parking Design and Poor Access to the Flats

There is no swept path analysis for the parking layout and it certainly not clear how cars parked in the bays nearest the road can get to or from those spaces without multiple manoeuvres immediately across the access to the road, a very risky situation. The three bays on the northern side have very little space for turning. It is likely that any cars using either parking area for the flats will reverse as a matter of necessity 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 amplified by the very poor visibility of cars coming along the side access road for those bays in the southern area. Reversing from the southern bays has the added hazard of a low brick wall along the boundary.

The disabled bays are significantly smaller than the recommended 3.6m wide which means the access path at the front of the flats will be blocked by vehicles parked in these bays. The narrower part of the footpath looks to be less than 1m wide, less than the minimal acceptable width of 1.2m and definitely insufficient for disabled use. Any future occupants would need to accept that disabled car users will need to park such that they block a significant width of the already narrow foot path.

The “visitor” parking bays are dangerously located at the curve of the drive and again have insufficient space around them to allow safe manoeuvring given that reversing will be necessary. We also note that any visitor arriving at the site will be unable to see if a visitor parking bay is available unless they drive down the driveway. If they then find the visitor bays occupied, they are likely to be left with no option except to reverse back along the very narrow driveway and reverse out onto Welcomes Road.

4. Traffic Impact

There is no reference to the fact that the access route is a public footpath and with no transport statement we believe the applicant has failed to demonstrate that the development would propose suitable sustainable transport mitigation and would not harm highway safety, in conflict with policy DM30 of the Croydon Local Plan 2018 and Policy 6.13 of the 2016 London Plan.”

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5. Waste Management

The bins for the flats are located in a room near the front door – it is not clear whether the intention is to have 18 wheelie bins or to use Eurobins. No provision is made for the bins to be available kerbside and this would mean dangerous roadside clutter just where there is poor visibility due to the curve on Welcomes Road. If there is a disabled car that overhangs the footpath it will be very difficult to manoeuvre the Eurobins or wheelie bins past the parked cars without risk of damage.

The bin space provided for the houses at the back is completely inaccessible by bin lorries despite being labelled as a collection point. The Council bin lorry at 2.6m wide would need to navigate the 2.3m wide driveway to collect the bins. The Council bin lorry would then need to reverse out of the driveway. The alternatives are equally unacceptable:

- 1) The Council bin lorry remain parked on Welcomes Road whilst the collection staff walk 33m to the bin collection point, collect the bins, empty the bins into the waiting lorry and then return the empty bins to the bin collection point.
- 2) The residents of the rear dwellings re-locate the bins from the collection point to a position near the road for collection. But there is nowhere to place the bins where they will not be in the way and therefore cause danger.

The proposal therefore does not provide adequate and accessible refuse storage. The application conflicts with policy DM13.1 of the Croydon Local Plan 2018.

6. Trees and the Environment

The Tree Survey identifies many Category A trees which will have to be removed to create the driveway to the back of the plot. It seems very likely that the other mature trees on the site would be affected by the disruption to their root systems which will come about from the construction work.

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. These areas are to be protected under Section 8 of the London Plan.

7. Cumulative Effect of Overdevelopment in the Area

The cumulative impact of developing (let alone over developing) individually relatively small sites MUST be considered - "these include the consequences for the special character of an area including green cover and tree canopies, for health and social infrastructure and for transport".

Recent Government report, Living with Beauty, states the importance of a green environment and specifically, in Policy Proposition 6, that non-negotiable infrastructure includes green infrastructure. This is not only for maintaining a pleasant environment for the residents, but more fundamentally is part of eradicating the UK's net carbon contribution. The green environment in areas such as Welcomes Road, with its mature trees, cannot be easily re-instated once destroyed by over-development.

The Planning and Access Statement makes reference to several 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

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allowance for 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 MUST be taken in its current context, which means we now have over 110 dwellings, a 10-fold increase overall, within Welcomes and Uplands Roads and its cul-de-sacs alone.

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
- No. 57 WR – 7 flats
- No. 35 UR – 6 houses
- No. 8 KC – 4 houses

Applications pending :

- No. 46 WR (this proposal)
- No. 60 WR – 7 flats plus 2 houses
- No. 52 WR – 9 flats (new proposal following previous refusal)
- No. 88 WR – 9 flats
- No. 90 WR – 3 houses
- No. 2 KC – 4 flats
- No. 1 KC – 15 flats + 4 houses

WURA have been pleased to see 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.

We accept that a plot such as 46 Welcomes Road is suitable for development but a plot of this size and topology does not support this level of intensification.

WURA requests that the application be REFUSED and again request that a complete and public moratorium is imposed for a defined period while the cumulative impact of so many large developments in a such a small area can be properly assessed.

Yours sincerely

Richard Russell
Secretary

Colin Brown
Chairman

Cc (by email): - Nicola Townsend, Head of Development Management
Steve O’Connell – Councillor
Jan Buttinger – Councillor
Chris Philp - MP
KENDRA

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