



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: Ms N Rowland

1st December 2021

Ref 21/04989/OUT

Dear Ms Rowland

Re: Demolition of existing detached bungalow and erection of a two storey building (with accommodation in the roof space) to provide 6 flats and a pair of semi-detached houses with car parking, cycle/refuse storage and hard/soft landscaping.

Objections to Previous Proposal Still Apply

We note that at as an overall plan this application is identical to the still pending previous application by the same applicant for the same plot, reference 20/06250/OUT, which we understand from the Croydon Planning website is also in your case load. This means that every reason for objection to the previous application still stands. Rather than repeating the details of those many reasons, we refer you to our letter of 14th December 2020 (attached) in which we provided significant objections in the following areas:

- Overdevelopment and intrusion, especially taking into account the raised nature of the land for the houses to the rear of the site.
- Poor access to the rear of the site, with major safety implications given the narrow-ness of the access drive and lack of turning space
- Poor parking design with poor access to the flats and insufficient parking space, given the number of 3-bed flats and 4-bed houses
- Traffic impact, especially given Welcomes Road is a Public Footpath with no pavements
- Poor waste management design, with no proper access for the bin lorry
- Trees and the environment, given the applicant's own survey identifies many Category A trees which would have to be removed

Objections to Changes Made in Current Proposal

In addition, we would like to emphasise the following points in light of the few changes the applicant has made:

- In our objections to the previous application we stressed the safety implications of the poor access to the properties at the rear of the site, as the proposed layout does not meet the requirements of

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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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Section 13 of the Fire Safety regulations (2019 edition with 2020 amendments). Despite a new Fire Safety Report being included, this key problem is not addressed at all.

- In terms of the changes to the environmental report, it is very worrying that the applicant appears to dismiss the need for a proper bat survey purely because the timing of the application has changed. This would appear to be disingenuous. Bats are regularly seen on Welcomes Road, including in the area around the site, and therefore it needs to be properly established whether or not the roosts are within the bounds of the plot.

Support from Recent Planning Decisions

We would also like to support the basis of our objections by referring to specific reasons included as part of recent rejections of comparable applications, decisions made by Croydon Council which apply directly to the current application:

- 21/02425/FUL at 67 Welcomes Road, rejected by Croydon Planning Dept on 26th November 2021
 - *Pt 1 The proposed scale and mass of the building would be harmful to the character of the area and overbearing on the streetscene by reason of the (...) the large front elevation (...) contrary to Policies SP4 and DM10 of the Croydon Local Plan (2018) and Policy D3 of the London Plan (2021).*
 - *Pt 4 Insufficient information has been provided to demonstrate that the development would not result in unacceptable harm to protected species or habitats, contrary to Policies SP7.4 and DM27 of the Croydon Local Plan (2018) and Policy G6 of the London Plan (2021)*
 - *Pt 5 The proposal could lead to detrimental impacts on highway safety due to (...) the shortfall of on-site car parking spaces, contrary to policies DM29 and DM30 of the Croydon Local Plan (2018) and policy T6.1 of the London Plan (2021).*
 - *Pt 6 The proposed refuse storage arrangements are not policy compliant by reason of the drag distance to the highway, the proposed receptacles and the lack of bulky waste storage area, contrary to policy DM13 of the Croydon Local Plan (2018)*
- 19/05954/FUL at 37 Welcomes Road, rejected by Croydon Planning Dept on 30th July 2020
 - *Pt 2 The development would create a hazard to pedestrians, cyclists and vehicular traffic using the highways and accesses by reason of inadequate and unsafe access and parking arrangements and would thereby conflict with Paragraph 109 of the NPPF, Policies DM29 and DM30 of the Croydon Local Plan (2018) and Policies 6.3 and 6.12 of the London Plan 2015 (consolidated with amendments since 2011).*
 - *Pt 3 The development would not provide adequate and accessible refuse and cycle storage. The application would thereby conflict with policies DM13.1 and DM30 of the Croydon Local Plan 2018.*
 - *Pt 4 The applicant has failed to demonstrate that the development would propose suitable sustainable transport mitigation and would not harm highway safety. The application would thereby conflict with policy DM30 of the Croydon Local Plan 2018 and Policy 6.13 of the 2016 London Plan.*

There is further support in decisions made by the Planning Inspectorate, particularly with respect to the impact on neighbours, the mismatch in resulting plot sizes, loss of trees and the change in character to the area:

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- 19 Orchard Avenue, Shirley CR0 8UB, rejection upheld by the Planning Inspectorate, decision date 4th October 2021 under reference APP/L5240/W/21/3266351
- 36 Oakwood Avenue, Purley CR8 1AQ, rejection upheld by the Planning Inspectorate, decision date 14th October 2021 under reference L5240/W/21/3266962

Immediate Impact of Current Developments

We are now in a position where several developments of this size have already been undertaken on the road, we would also request that a detailed CLP is a pre-requisite of any work being done on this site. Proposals such as these typically require significant movement of spoil because of the topography of the sites along Welcomes Road. Given the construction and width of the road, few developers have managed to carry out their work without damage to neighbouring properties and/or 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 their work.

Cumulative Effect of Over Development

As we have stated in several recent objections, the Council must take into account the cumulative effect of overdevelopment in the area, with 8 intensification proposals already approved and more still pending in the Welcomes and Uplands Road region alone. We list these in detail in our letter of 14th December 2020 (attached). 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 area cannot cope with the impact but that the character of the area will be changed, something contrary to the Croydon Plan.

As we indicated before, 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.

Yours sincerely

Richard Russell
Secretary

Colin Brown
Chairman

Enc: objection letter for 20/06250/OUT

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

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