



# 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 Yvette Ralston

10<sup>th</sup> November 2020

**Ref 20/05352/FUL**

Dear Ms Ralston

**Re: Proposed development at 52 Welcomes Road CR8 5HD: Demolition of the existing dwelling and erection of a 3 storey building to provide 9 flats with associated parking, cycle storage, landscaping and childrens play space. Previous application 19/05485/FUL refused.**

It is not clear to WURA that the applicant has addressed many of the key issues identified in the refusal of the previous application for this site; 19/05485/FUL.

As always, WURA considers the impact on the road, road user safety and the environmental impact on the area. We believe this application is no better than the previous one in any of these respects and indeed is worse with regards the first two reasons documented by the Planning Office previously.

Rather than re-iterating our objections to the current proposal in the same way as before, we would like to take those particular points from the previous refusal for 19/05485/FUL:

**1** *“The proposal, by reason of its design, height, massing, siting, scale, materials and overall proportions would result in an incongruous form of development. The proposal would therefore fail 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.”*

**2** *“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 (consolidated with alterations since 2011).”*

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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Previous proposed elevation:

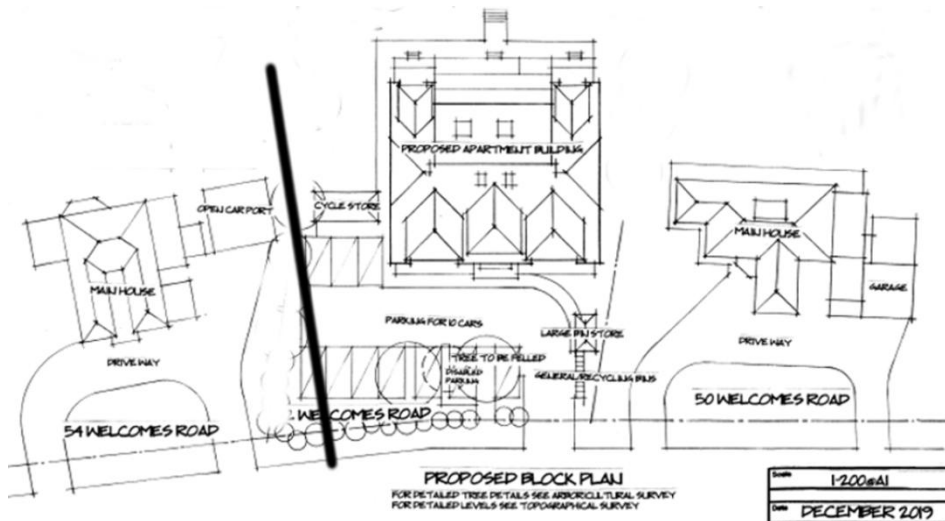


Current proposal:



Proposed East Elevation Scale 1:100  
Front Elevation

Previous proposed site plan:



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Current proposal:



Adding a couple of trees and omitting the neighbouring bungalows from the elevation graphic does not hide the fact that the new proposal is even more massed on the site and out of scale with the surroundings than the previous one. The building extends much more closely to the neighbouring property at no 54, presumably as a result of the proposal trying to provide adequate accommodation in 9 flats after the previous proposal was rejected for sub-standard accommodation. It should be accepted and stated that the size of the site just does not support this number of flats.

**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.”*

The new proposal has the same inadequate number of parking spaces. As far as can be ascertained from scaled drawings, the access to the road is unchanged.

There is no reference to the fact that the access routes are Public Footpaths. There is no transport assessment or analysis of the impact on traffic volumes on Welcomes Road. Welcomes Road is narrow and a designated footpath where no parking is permitted on the road or verges.

People going to work need to get there safely and families need to get their children safely to school. 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. It is used by non-residents seeking a quick route to Kenley Station and sadly not all drivers adhere to speed limits or even appear to be aware that there are no pavements for pedestrians.

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The Council's laudable aim is to reduce the dependency on cars, but the reality of the area is that even to get children to the nearest school it is far safer to drive than to walk. The increase in traffic caused by the intensified development only serves to add to the risk for other road users on a designated footpath which is already inherently dangerous for pedestrians and cyclists.

*5 "The development would not provide adequate and accessible refuse storage. The application would thereby conflict with policies DM13.1 of the Croydon Local Plan 2018."*

There does not appear to any change in the capacity and accessibility of the refuse storage. There is no access for a refuse lorry and no space for the bins to be placed at the kerbside for collection.

We note that no Logistics Plan has been provided. We recognise that this should be available under a condition of planning but would like to stress the importance of a realistic and manageable plan. We have seen many failures by developers already to meet their obligations in this area. Given the location of the site in an area where walking is highly prevalent, WURA believe that the construction should be undertaken to the CLOCS Standard, which we understand the London Borough of Croydon has already embraced. This commitment to the CLOCS Standard should be embedded throughout the Construction Management Plan.

**WURA requests that the application is REFUSED as it is no improvement on the previous one.**

Yours sincerely

Richard Russell  
Secretary

Colin Brown  
Chairman

Cc (by email): - Nicola Townsend, Head of Development Management  
Heather Cheesbrough, Director of Planning and Strategic Transport  
Steve O'Connell – Councillor  
Jan Buttinger – Councillor  
Chris Philp - MP  
KENDRA

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