



# 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 Sales

28<sup>th</sup> May 2021

**Ref 21/02084/OUT**

Dear Mr Sales

**Re: Proposed development at 54 Welcomes Road CR8 5HD: Erection of 8 no. 2 storey semi-detached houses arranged over four buildings with associated landscaping, parking and vehicular access**

As we have not 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 increasingly important that the impact on the road and the immediate surroundings is properly considered in the planning process given the number of developments in the pipeline and the limited road space available fronting them .

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.

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

Whilst we recognise that this particular application represents potential family homes, putting 8 families on the single plot is excessive and unsustainable given the limitations of the abutting infrastructure and the size and topography of the plot itself.

We make no apologies for repeating this information for all the current proposals and emphasise again that this application should be considered in its current context, which would mean around **140** new dwellings within Welcomes and Uplands Roads and its spur roads alone.



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## Already approved :

- No. 10 WR – 8 houses (due to start work)
- No. 32 WR – 9 flats (marketing)
- No. 36 WR – initially 7, now 8 flats (sold)
- No. 42 WR – 7 flats plus 2 houses (due to begin)
- 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
- No. 46 WR - 6 flats plus 2 houses
- No. 50 WR - 6 flats plus 2 houses
- No. 54 WR – 8 houses (this application)
- 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
- No 2 and 4WR 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:

### **Poor Access to the Back Section of the Site: Safety Implications**

The drive to the houses at the back of the site looks extremely narrow as well as being close to the boundary with the adjacent property.

Our understanding from the latest Building Regulations (Fire Safety 2019 edition with 2020 amendments, Section 13) is that there should be access to within 45m of all points within a house which means that the fire appliance would need to approach the rear properties using the access drive along the side of the site. The minimum width required for fire engine access is 3.7m and according to the site plan the drive is simply not that wide – to scale it looks to be barely 2.5m wide although the Transport Assessment indicates a width of 2.75m (para 3.9). How can this possibly be “considered suitable to allow access by fire appliances”? Dead-end access routes longer than 20m also require turning facilities, clearly not possible here if there is anything parked in the bays.



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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 bend in 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.

These issues are indicative that this site cannot support this level of over-development.

### **Poor Quality Proposal : Inadequate Allowance for Site Topography**

The rear of the site is considerably higher than the level of the current property, as shown by the site section. It is not clear how the land to the back of the properties at the rear of the plot is being managed. Currently any ground floor access and probably windows would appear to be below ground level. If this is not the intention, then there needs to be a proper cross-section, plans for removal of spoil and details of the supporting engineering which will be required to ensure that land on either side remains stable.

### **Waste Management**

The area allocated for the properties to the rear of the site for their recycling looks completely inadequate for 4 family-occupied properties. The bins will therefore overflow and block the already narrow drive.

It would also appear that the recycling lorry is expected to go up the drive to access the area, an impossible manoeuvre as the narrowness of Welcomes Road means the lorry can probably not even turn off the road.

There is no provision for the bins to be available for collection kerb-side either from the properties at the front. To state that this will be "from the main carriageway in the same manner as the existing dwelling" (Transport Assessment, para 3.14) overlooks the fact that there will be 4 times as many bins.

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

### **No Disabled Access**

While we appreciate the plan includes several wider parking bays intended for use by disabled people, it is noticeable that the houses as shown in the Planning Statement all seem to have a step up to the porch.

### **Poor Parking Bays**

Although we appreciate that the design proposes two parking bays per dwelling and makes much of the space available for the swept paths, the bays themselves appear to be narrower than recommended and some of the swept paths look "interesting". Certainly the bays nominated for disabled use do not appear to be the recommended width of at least 3.6m.

### **Missing Transport Assessment**

The Transport Assessment document makes no actual assessment of the traffic impact of 7 more family dwellings on the plot.



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## **Environmental Impact**

The Planning Statement acknowledges there is “thick vegetation to the rear boundary” but does not fully represent it on the site plan. This will significantly overshadow the gardens at the rear of the site which with the houses to the front will be in virtually perpetual shade.

In addition, the parking bays at the front are shown extending into the hedging, so this is unlikely to be retained.

Future residents are likely to prune this vegetation back or even kill it, to improve the amenity of their limited garden space.

## **Overdevelopment and Intrusion**

The street-scene view noticeable omits the houses to the rear of the plot even though they will be plainly visible from the road given the topography of the site. Such a view would show how overlooking those houses will be, not only of the properties to the front, but also of their immediate neighbours to either side.

The site section graphic discretely blank all detail of the side walls of the rear properties but there are some windows, albeit relatively small ones. Given the high position of those properties, those windows will be very overlooking.

**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