



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: Ms Yvette Ralston

10<sup>th</sup> November 2020

**Ref 20/05349/FUL**

Dear Ms Ralston

**Re: Proposed development at 67 Welcomes Road CR8 5HA: Demolition of the existing dwelling and erection of a 4 storey building including accommodation in the roofspace to provide 8 flats with associated parking, cycle store, bin store and landscaping.**

WURA are concerned with the impact on the roads in the area, the impact on the environment and the safety of all road users, particularly pedestrians and cyclists on Welcomes Road itself, a designated footpath and the amenity of WURA members.

Focusing purely on these elements, WURA requests that this application be **REFUSED** on the following grounds:

**1. Overdevelopment and Intrusion**

The site is on a steeply sloping plot with bungalows on either side overlooking a chalet-style property on the other side of the road. The scale of the development at 4 storeys will be completely dominating in the area, as should be apparent from the CGI image below taken from the design statement.

**Look how close to the neighbouring property the new build is and how much higher than the bungalow. The neighbours will have absolutely no privacy and their home and garden will be completely dominated.**



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](http://www.wura.org.uk)

---

Given that among the reasons for rejecting applications at both 37 and 52 Welcomes Road were that :-

“ the proposals failed 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” and 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.

## **2. Poor Quality Proposal : no proper recognition of the steepness of the site and the structural implications**

Given the proposed site layout, significant landscaping/groundwork will be required before building can even commence. There is reference to a lift for a wheelchair which indicates the difference in height between the proposed parking spaces and the front of the property. There is no statement on their plans for retaining walls for the land of adjacent properties. The steepness of the site is not something which is addressed properly in any of the proposal documentation.

Compare the two images below, noting that the top of the green bank in the photo on the left is the location of the existing property and its immediate neighbours.



The CGI image on the right would indicate the parking area is being significantly leveled/lowered to the front. There is nothing in any of the plans or statements which show how the existing much higher levels will be retained for the neighbouring properties. This is no insignificant detail, we are talking major structural engineering issues which must be properly addressed to ensure that those properties do not suffer from subsequent subsidence or any falling away of their land.

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 removal of so much earth in order to achieve the level suggested in the CGI will entail numerous HGV journeys which will impact both Welcomes Road and probably Zig Zag Road which is a steep and narrow privately paid for highway unsuitable for HGV traffic.

### 3. Waste Management



The proposal contradicts itself in terms of recycling and waste provision.

The area is marked as pt 3 in the graphic on p4 of the design statement which you will note is **above** the disabled access lift.

The design statement says this will allow “easy access... for kerbside collection”. This is plainly not the case – the bins are no where near kerbside and on a completely different level. There is no space to make them available for collection.

The proposal therefore does not appear to meet the requirements of the Croydon Local Plan Policy DM13.1.

Inadequate provision will have an impact on the immediately surrounding road with clutter from bins which cannot be housed appropriately and which will cause road blockages and safety hazards a situation now likely to become apparent with the completion of 7 flats on a steep plot at 57 Welcomes Road not far from 67WR. There is no evidence of consultation with the waste collection company by the developers of either property.

### 4. Road Safety and Insufficient Parking Capacity

This location is in a low PTAL area of 1b and while we acknowledge that the capacity is within the range identified in the London Plan it is worth noting that PTAL rating makes no account of capacity for parking nearby. We understand the aim of reducing car ownership, but given our observations below and the fact that no parking is allowed on Welcomes Road it is clear that to provide 1 parking space per dwelling where all but one of the flats is aimed at families of 3 or more people (including one for 5 people) is inadequate.

As with the other proposals in the area, the developer is targeting the majority of the flats at family residents with young children, by including play areas and 2 x 3-bed flats. Such families need to get their young 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.

Gradients on the local roads are steep and unfortunately this means a high ratio of SUV-style vehicles, larger than average and less maneuverable. The planning department employees who visited the area to meet WURA a couple of years ago commented on how steep the roads are.

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](http://www.wura.org.uk)

To indicate the station is within “attractive walking distance” for people, especially those with pushchairs and toddlers, is wrong. It is clear the author has not walked any distance along Welcomes Road early on a winter’s evening in the dark.

The Transport Statement uses figures from 2011, well out-of-date. More recent figures indicate that car ownership in Kenley is over 83% of households with 38% of those (i.e 46% of properties) having multiple cars. Accepting that flat dwellers would probably not be in the 10% of the 83% owning 3 cars or more, it is still a virtual certainty that people purchasing flats on Welcomes Road (probably to be priced at £300k-£400k) would own at least one vehicle.

Given that there is no parking on Welcomes Road, there is insufficient capacity for the flat dwellers themselves, let alone for visitors, deliveries to the flats, tradesmen, etc. All of these will have a direct impact on the road by causing obstruction. The application would thereby conflict with policy DM30 of the CLP.

To suggest that a total 25 people within these 8 flats would only create 28 trips per day seems to assume that Covid-19 lockdown will be in place for a very long time to come. These flats are not being aimed at retirees, but at working people. Such figures do not bear any realism by the time you consider travel for work, shopping (no-one is going to walk the length of Welcomes Road with a load from the supermarket), schooling, kids and social activities etc. One return trip to work and one return trip to school for each property already exceeds the number. The statistics in Appendix E used as the basis for the tables in Section 5 make no reference to the type of flatted development or provision for parking for the occupants of those developments. 76 flats in a single block in Enfield, 170 flats in a single block in Kew, 83 flats in a single block in Poplar – car ownership is not likely to be at the same levels as for a block of 8 flats. The nearest comparison would be the 18 flat block in Palmers Green but that is not a suburban environment and it’s impossible to separate those figures from the overall ones provided. It’s a classic example of the inappropriate use of statistics to support completely unrealistic statements made within the proposal.

The Transport Statement also mentions the open frontage and good visibility. It makes no reference to the fact it is right opposite a T junction with the inherent dangers for any vehicle maneuvering, especially any reversing. As is so often the case with this type of proposal, there are some very strange-looking uneven curves in the swept path analysis diagrams. Given how tight it is, again we have unrealistic statistics being used : a “medium car” of 4.3m long by 1.7m wide with a turning radius of 5m. Even the UK average hatchback is larger: 4.4 to 4.7m long and typical saloons up to 4.9m long. These would not be able to achieve the manoeuvres shown in the swept paths.

## 5. Complete Lack of Logistics Information

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, especially on steep sites such as this one. The groundwork likely to be involved has already been mentioned above. A report by a quantity surveyor showing the number lorry trips required to clear the site would be desirable.

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

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](http://www.wura.org.uk)

Croydon has already embraced. This commitment to the CLOCS Standard should be embedded throughout the Construction Management Plan.

## 6. Cumulative Effect of Overdevelopment

As we have done with all our responses to recent proposals, WURA requests that Croydon Council makes proper 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 the following within Welcomes and Uplands Roads and its cul-de-sacs alone. This represents over 110 dwellings, a 10-fold increase overall:

Already approved (54 dwellings):

- 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. 2 KC – 2-4 units (under PIP)
- No. 8 KC – 4 houses

Applications pending (49 dwellings):

- No. 60 WR – 7 flats plus 2 houses
- No. 52 WR – 9 flats (new proposal following previous refusal)
- No. 67 WR – 8 flats (this proposal)
- No. 88 WR – 9 flats
- No. 90 WR – 3 houses
- No. 1 KC – 15 flats + 4 houses

WURA fully recognise the need for more housing and have been active in trying to engage constructively with the Strategic Planning, Development Management and Transport Departments at Croydon Council. A few of the proposals above are an appropriate level of development for the size of the plot, providing adequate parking capacity and overall amenity for both the new residents and existing neighbours. WURA do not object to those. However we continue to believe that the level of intensification brought by 9 flats on a plot which cannot even provide sufficient parking is not right when it is to the complete detriment of the surrounding environment and impacts the day-to-day road safety of the local population.

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.

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](http://www.wura.org.uk)

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.

**WURA requests that the application be REFUSED and again request that a 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  
Heather Cheesbrough, Director of Planning and Strategic Transport  
Steve O'Connell – Councillor  
Jan Buttinger – 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