



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 Y Ralston

3rd June 2021

Ref 21/02425/FUL

Dear Ms Ralston

Re: Proposed development at 67 Welcomes Road CR8 5HD: Demolition of the existing property and erection of a 3 storey building above a basement car park to provide 8 flats with associated landscaping

We believe we have contacted you before regarding applications and therefore you should be 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 more and more important that the actual impact on the road and the immediate surroundings is properly assessed and considered when the number of developments being proposed for such a small area. 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. Indeed, as you will be aware, the applicant has another current proposal for 34 Welcomes Road (21/02085/FUL) and given the correspondence in scale and approach of both, many of the grounds for objection are similar.

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

The Transport Statement and the Design and Access Statement make reference to the 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 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 would mean around **140** new dwellings within Welcomes and Uplands Roads and its cul-de-sacs alone.



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Already approved :

- No. 10 WR – 8 houses (work starting)
- No. 32 WR – 9 flats (marketing)
- No. 36 WR – initially 7, now 8 flats (sold)
- No. 42 WR – 7 flats plus 2 houses
- 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
- No. 67 WR – 8 flats (this application)
- No. 88 WR – 9 flats
- No. 90 WR – 3 houses
- No. 2 KC – 4 in-fill flats
- No. 1 KC – 9 houses
- Nos 2 and 4- with developer

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 is urged to 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 the above, this application should be **REFUSED** even on its own, for the following reasons:

Poor Quality Proposal : Inadequate Allowance for Site Topography

We see no proper assessment of the level of excavation work which will be needed and no detail as to how such major excavation work is to be carried out. 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.

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.

The whole management of the site from this perspective is insufficiently defined, with no site cross-section showing current and proposed levels. The graphic in section 1 of the Design and Access Statement appears to show the car emerging up a slope from the garage area to the road. Given the volume of water which flows down Welcomes Road even during an average rain fall, anything lower than the road could act as a significant reservoir, flooding the garage area and making the disabled access lift un-useable.

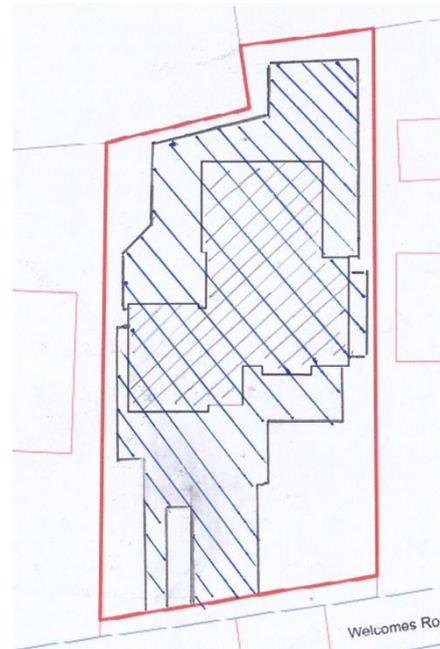
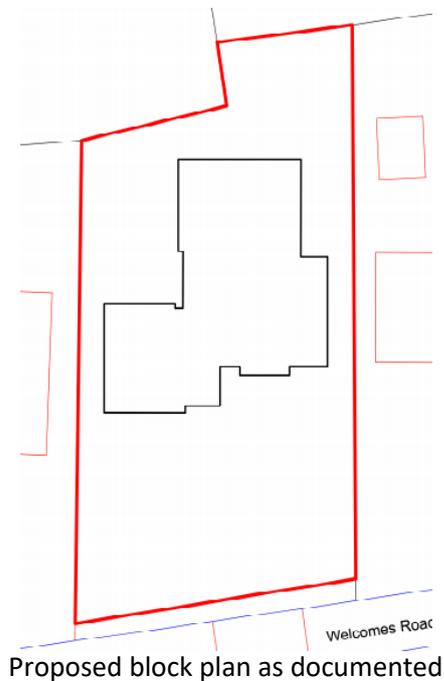


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Massing

The percentage of building and hard landscaping on the site is breathtaking. The proposed block plan does not give the full picture. The Landscape Masterplan does. A comparison of the two is shown below:



This ratio is not acceptable within an area which is recognised 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.

The 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 is more fundamentally part of eradicating the UK's net carbon contribution. The green environment in areas such as these cannot be re-instated once destroyed by this level of over-development.

Lack of Amenity

We see very little improvement to the earlier proposal in terms of real access to high quality communal outdoor amenity space as required by Policy DM10.5, despite the attempt to argue otherwise in the Planning Statement. Tiny terraces do not provide any amenity for 5 residents in the 3 bed apartments and although the Planning Statement indicates a total of 132 sqm of communal space, the vast majority of this is adjacent to the road and therefore on public view, offering no privacy to residents.

There is no facility for children's play areas and certainly nowhere safe for them to knock a ball around.



Overdevelopment and Intrusion

The graphic on the front page of the Design and Access Statement (part 1) shows how completely dominating of the surroundings the proposed structure would be.

Given that among the reasons for rejecting applications at both 37 and 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.

Inaccurate Transport Assessment

To state that Welcomes Road “not subject to regular through-traffic and generally only serves the dwellings that take access from it” (para 2.3) is demonstrably inaccurate – please view any applications for roads around Hayes Lane and they will be proposing access to Kenley Station via Welcomes Road.

Although the road is a “two-way access road” is misleading (para 2.3), as Welcomes Road is less than 5m wide in many sections where one vehicle has to pull into a driveway to let another pass. At least other recent applications have recognised the fact that the road is narrow and is not standard 2 car width. To state that “...this arrangement results in an integrated slow-moving route shared by both vehicles and pedestrians” (para 2.4) is also entirely untrue as can be attested by any non-driver user of the road. It is unsafe with a serious accident more likely as the number of vehicles using the public footpath increases, including those manoeuvring into and out of extremely limited parking areas (as proposed for many of the new developments on the road) resulting in road blockages.

The table shown for current traffic generation is obviously wrong: the individual values would indicate a total of 2 two-way journeys per day, not 5.

Time Period	Arrivals		Departures		Two-way	
	Trip Rate	Traffic	Trip Rate	Traffic	Trip Rate	Traffic
AM Peak Hour (08:00-09:00)	0.141	0	0.324	1	0.465	1
PM Peak Hour (17:00-18:00)	0.239	1	0.169	0	0.408	1
Daily Total	2.535	3	2.452	2	4.987	5

Table 5.1 Existing Traffic Generation – 67 Welcomes Road

An increase from 2 or even 3 journeys per day to 28 give the true effect of this level of development – by definition it has to be at least a 7-fold increase.



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The developer is presumably targeting family residents with young children, by including a substantial proportion of 3-bed flats. Such families need to get their young children safely to school, play groups and other activities. 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. This will mean a significant knock-on effect on the number of car journeys made by the new residents and we believe that by simply referencing previous approvals, 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 CLP and Policy 6.13 of the 2016 London Plan.

Unsafe and Inadequate Parking Provision

As with so many of the previous applications for similar developments, there is inadequate parking for this proposal too. However, it appears to be even worse here given the number of 3-bedroom flats. Occupants are highly unlikely to have only one car and no visitors. Welcomes Road is narrow and is a designated footpath where no parking is permitted or even possible on the road or verges, so there is no capacity for overflow.

Para 3.10 of the Transport Statement indicates 1 service vehicle visit per week. This is plainly preposterous – do the residents never even get a delivery? Are the developers guaranteeing that all appliances installed in these apartments will never fail (most especially the lifts, well-known for needing a high level of maintenance), the decorating will never need to be redone, or the plumbing need attention?

There is no allowance for deliveries, service vehicles or visitors. This is symptomatic of over-development : the site simply cannot support this number of dwellings.

The approach drive to the underground parking is narrow and does not allow for two vehicles to pass each other. There is certainly no space within the garage area for more than one car to manoeuvre. This means any vehicles going in or out at the same (highly likely, given school hours) will result in one of those vehicles having to reverse dangerously on to the road.

Poor Quality Proposal: Missing Information

Despite being a full planning application, we note that the following documentation is missing:

- Construction Logistics Plan
- Environmental Impact Assessment
- Carbon reduction strategy – how would solar panels impact the street-scene given the already very dominating aspect of the front elevation? The very high percentage of land being either built on or hard-landscaped makes it very difficult to retro-install a ground-sourced heat pump, currently acknowledged as the most eco-friendly approach to central heating.
- Surface water management strategy – how will the large run-off from such a large construction be managed? Excess water must not enter the foul waste system nor be directed on to Welcomes Road, which already has a drainage capacity problem.

The former is more important than usual for this site, because of the level of spoil which will need to be removed during the initial ground works. A report by a quantity surveyor showing the number of lorry trips required to clear the site would be desirable.



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Given the location of the site on a junction with Zig Zag Road and 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.

Waste Access

We can see no provision made for the bins to be available kerbside on collection day without completely blocking the access route and/or cluttering the road itself, increasing the danger for all road users. Are the operatives meant to come up to the bin store? This contravenes policy DM13.1 of the CLP and is yet another indicator of the site being unable to support this number of dwellings.

In summary, this proposal does not represent long-term family dwellings. With 3 x 3 bed flats, it provides a token 'tick in the box' for the 30% target 3-bed accommodation but very little else.

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