



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 Goodwin-Roberts

15th November 2020

Ref 20/05414/OUT

Dear Mr Goodwin-Roberts

Re: Proposed development at 88 Welcomes Road CR8 5HE: Demolition of existing bungalow and redevelopment to provide a 3 storey building containing 9 apartments including parking, landscape and amenity areas.

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.

Many of the decisions which have gone before and the similarity of the basis of the current application means that local residents are suffering from an "objection fatigue" which results in a lowering of the number of individual objections raised. It is important, however, that the opinions of WURA and its members are fully represented so we are writing to object in the strongest possible terms for yet another overdevelopment of a site on Welcomes Road.

We are hopeful that recent refusals for 19/05954/FUL and 19/05485/FUL mean that proper consideration is now being given to the cumulative effect of all the recent applications for overdevelopment.

WURA requests that this application be **REFUSED**:

1. Cumulative Impact – Road Safety, Infrastructure and Environment

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

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- 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
- No. 88 WR – 9 flats (this proposal)
- 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.

We have raised again and again the impact of the additional vehicles such developments will bring. This particular application did not even provide an attempted analysis of the impact. Welcomes Road is narrow and is actually a designated footpath where no parking is permitted or even possible on the road or verges.

As with the other proposals in the area, the developer is targeting the majority of the flats at family residents, by including play areas and 3 x 3-bed flats. Such 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.

In front of Kenley Station, cars regularly mount the pavement to pass each other and access to the Caterham-bound platform for pushchairs requires use of the Hayes Lane bridge with an extremely narrow pavement and poor sight lines. 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.

Gradients on the local roads are steep and unfortunately this means a high ratio of SUV-style vehicles, larger than average and less maneuverable. It also means there are very few cyclists – the planning department employees who visited the area to meet WURA commented on how steep the roads are.

All this means that we can safely assume that virtually all the new dwellings will have at least one car which they will be using on a daily basis, significantly increasing the already high risk for all users of Welcomes Road.

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.

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These areas are to be protected under Section 8 of the London Plan. 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.

2. Out of Keeping and Over-Development

While we recognise that this is an Outline application, there are some glaring omissions which, if included, would show how out of keeping with its surroundings and obtrusive this proposal is.

There has been no attempt to keep the character or integrate with the surroundings. The design statement implies there is no consistency in the current accommodation and uses the development at no 57 to show "evolving character". In practice, many other applicants have specifically referenced some key common features such as tiled pitched roofs, bargeboards for gable ends, large timber french doors and sash style windows; brick, stone and tile used on the elevations with detailing including stone sills and heads and tile bands with hanging tile features throughout. No 57 actually exhibits many of those design elements in the photo used to illustrate the opposite. No 57 also presents as a single dwelling. The proposed design in the graphics uses none of the documented features and presents as a multiple dwelling.

The outline application states that the elevations and layouts are indicative but the design statement clearly states at Para 4.2 that this gives a clear indication of the type and scale of development envisaged. The proposals lack design and the box-like structure appears very speculative. The materials presented in Para 6.4 are used to justify this design but the argument is incomplete and biased – there is no indication of a design approach except "anything goes". Properties in the Welcomes Road area present with a standard gable or hipped roof finished in tile. There is no justification for a flat roof pseudo-mansard roof with zinc finishing.

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", we believe very strongly that the same ruling should be made for this proposal.

3. Insufficient Parking Capacity and Poor Parking Design

This location is in an extremely low PTAL area of 0 and while we acknowledge that the parking 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 above and the fact that no parking is allowed or even possible, except briefly, on Welcomes Road it is clear that to provide 1 parking space per dwelling with only one to spare where there are 6 x 2-bed flats and 3 x 3-bed flats is inadequate.

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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.

The parking design itself is not viable:

- 1) The swept paths shown from bays 5 and 6 are very convoluted, requiring excessive amounts of maneuvering if larger than average cars are parked in these spaces (which as we have discussed above is more than likely).
- 2) The information for all the swept paths is called into question as bays 7 to 10 are only 4.8m long with only 5.9m of maneuvering space to bays 1-4 (should be 6m as a minimum). Any car parked in bays 7 to 9 with any part of its body over hanging the marked parking space will clearly reduce the available maneuvering space further.

For reference the model of Alpha Romeo shown in the 3D artists views are 4.70m long. Anyone parking one of these Alpha Romeos in bays 7 to 10 MUST ensure that their front bumper is within 10cm of the parking bay boundary or else, part of their expensive design--icon will be at risk of damage as other cars are maneuvered in/out of the parking bays.

- 3) It is likely that many cars using this parking area as a matter of necessity will reverse and use the parking area entrance as a turning point. This would have specific concerns in terms of pedestrian safety at the front of the proposed building and the very poor visibility on the side access road.

4. Very Poor Disabled Access

The application feels as if it is giving mere lip service to disabled access as the proposal is not practical.

The 2 parking bays marked for disabled use are immediately adjacent to the only pedestrian access footpath to the front door of the building. Strangely, this design proposes disabled parking bays that are narrower (2.35m) than the standard parking bays at (2.4m). This can hardly provide proper access as disabled bays are normally at least 3.6m wide. It is accepted that the foot path provides some additional space for a disabled user. However, with the disabled parking bays being so narrow it is likely that any cars parked in these bays will impinge on the walkway by up to 20cm.

It is then noted that the only access path to the front door is already the minimum acceptable width at 1.2m wide. With the potential for the cars to then reduce the foot path width by 40cm the available footpath width could be as low as 80cm, completely inadequate for even able-bodied access.

WURA is pleased that the proposal incorporates an elevator so that there is full disabled access to all levels of the building. However, it is very disappointing that disabled users may not be able to enter/exit the building due to the very poor disabled parking provision.

5. Poor Access for Recycling

The proposal provides very sparse information regarding the design and access to the bin store. Again, we recognise this is an outline application, but the bin store is located in a very awkward location that will make it impractical:

- 1) The space available for the waste store access is very narrow as 1.7m. The width of the access is clearly restricted by the position of parking bays 6 and 7.

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- 2) The proposal has already made parking bay 6 slightly too short at 4.75m and so it is likely that any car parked in bay 6 will overhang the parking bay and further restrict the access to the waste store.
- 3) This proposal provides no viable way for the waste collection process. Clearly the waste store is too far from driveway entrance at 15m. Either the Councils waste collection team will need to accept that they will drag the waste container from the waste store and then return the containers to the store, or the occupants will need to position the waste containers near to the car park entrance on collection days. Whether the proposal is to use a dozen or so wheelie bins or a few Euro-bins there is nowhere to place the waste containers ready for collection. They will clearly block the car park access and cause dangers to both car users and pedestrians.
- 4) Proposals for blocks of flats normally incorporate Euro-bins. But with the very narrow waste store entrance (made narrower if there is a car parked in bay 6) it will be very difficult to maneuver Euro-bins on this site. Occupants typically dislike maneuvering Euro-bins as they are too big and heavy except for the strong and healthy so it will fall to the council waste collection team to navigate the Euro-bins through the narrow doorway and across the car park.

The poor parking design, impractical disabled access and lack of access for the recycling all demonstrate that this site can not support this level of intensified development viably.

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, particularly in respect of road safety and infrastructure. The former is impacted by increased traffic and insufficient parking provision and we are already seeing the impact on the latter with damage to drains on Welcomes Road caused by HGVs.

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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